

Relevant extract of the Town Planning Board Guidelines for
Application for Open Storage and Port Back-up Uses
(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 or if required, 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 applications, 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. Planning permission for 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 uses 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 the sites through landscaping and/or fencing should be provided 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; and
 - (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.

Previous Applications covering the Application Site

Approved Applications

	Application No.	Applied Use(s)/Development(s)	Date of Consideration (RNTPC)
1	A/YL-LFS/514	Proposed Temporary Open Storage of Construction Materials for a Period of 3 Years	19.4.2024 [revoked on 19.10.2025]
2	A/YL-LFS/515	Proposed Temporary Open Storage of Construction Materials for a Period of 3 Years	19.4.2024 [revoked on 19.10.2025]
3	A/YL-LFS/516	Temporary Open Storage of Construction Materials for a Period of 3 Years	10.5.2024 [revoked on 10.11.2025]

**Similar Applications within the Subject “Recreation” Zone
on the Lau Fau Shan and Tsim Bei Tsui Outline Zoning Plan**

Approved Applications

	Application No.	Applied Use(s)/Development(s)	Date of Consideration (RNTPC)
1	A/YL-LFS/451	Temporary Open Storage of Construction Materials and Engineering Machineries for a Period of 3 Years	3.2.2023
2	A/YL-LFS/479	Temporary Open Storage of Scrap Metal for a Period of 3 Years	11.8.2023 [revoked on 11.5.2025]
3	A/YL-LFS/493	Proposed Temporary Open Storage of Hardware Accessories for a Period of 3 Years	24.11.2023 [revoked on 24.5.2025]
4	A/YL-LFS/504	Temporary Open Storage of Construction Materials for a Period of 3 Years	16.2.2024
5	A/YL-LFS/505	Temporary Open Storage of Construction Materials and Machineries with Ancillary Workshop, and Vehicle/Cargo Compartments Assembly and Repair Workshop for a Period of 3 years	1.3.2024
6	A/YL-LFS/555	Proposed Temporary Open Storage of Construction Materials and Construction Equipment for a Period of 3 Years	1.8.2025
7	A/YL-LFS/560	Proposed Temporary Open Storage of Elevated Working Platform for a Period of 3 Years	10.10.2025 [revoked on 10.4.2026]
8	A/YL-LFS/568	Proposed Temporary Open Storage of Building Materials for a Period of 3 Years	19.9.2025
9	A/YL-LFS/570	Proposed Temporary Open Storage of Hardware Accessories for a Period of 3 Years	6.2.2026
10	A/YL-LFS/583	Proposed Temporary Warehouse and Open Storage of Construction Machinery and Construction Materials for a Period of 3 Years	23.1.2026
11	A/YL-LFS/594	Proposed Temporary Open Storage of Construction Materials and Machinery with Ancillary Facilities for a Period of 3 Years	27.2.2026
12	A/YL-LFS/596	Temporary Open Storage of Scrap Metal for a Period of 3 Years	13.3.2026
13	A/YL-LFS/607	Proposed Temporary Open Storage of Construction Materials for a Period of 3 Years	24.7.2026

Government Bureau/Departments' General Comments

1. Land Administration

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

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

2. Traffic

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

- (a) She has no adverse comment on the application from traffic engineering perspective.
- (b) The applicant should note her advisory comments at **Appendix V**.

(ii) 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 applicant should note his advisory comments at **Appendix V**.

3. Environment

Comments of the Director of Environmental Protection (DEP):

- (a) He has no objection to the planning application from environmental planning perspective, since the applied use would not generate traffic of heavy vehicles nor involve dusty operation and no residential dwelling is present within 100m from the boundary of the application site (the Site).
- (b) There is no substantiated environmental complaint pertaining to the Site in the past three years.
- (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) She has no objection in principle to the application from public drainage perspective.
- (b) Should the Town Planning Board consider the application acceptable from the planning point of view, approval conditions should be stipulated requiring the

applicant to (i) submit a revised drainage proposal and (ii) implement and maintain the proposed drainage facilities as indicated on the revised drainage proposal to the satisfaction of the Director of Drainage Services or of the Town Planning Board.

5. Fire Safety

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

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

6. Building Matters

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

- (a) As there is no record of approval granted by the Building Authority (BA) for the existing structures at the Site, he is not in a position to offer comments on their suitability for the use proposed in the application.
- (b) it is noted that six structures are proposed in the application. Before any new building works (including containers/open sheds as temporary buildings, demolition, land filling, etc.) are to be carried out on the Site, prior approval and consent of the BA should be obtained, 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.
- (c) The applicant should note his advisory comments at **Appendix V**.

7. Project Interface

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

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

8. District Officer's Comments

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

His office has not received any feedback from the locals.

9. Other Departments' Comments

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

- (a) Director of Leisure and Cultural Services (DLCS);
- (b) Head of Geotechnical Engineering Office (H(GEO)), CEDD;
- (c) Chief Engineer/Construction, Water Supplies Department (CE/C, WSD); and
- (d) Director of Agriculture, Fisheries and Conservation (DAFC).

Recommended Advisory Clauses

- (a) prior planning permission should have been obtained before commencing the applied use at the application site (the Site);
- (b) should the applicant fail to comply with any of the approval conditions again resulting in the revocation of planning permission, sympathetic consideration may not be given to any further applications;
- (c) to resolve any land issues relating to the development with the concerned owner(s) of the Site;
- (d) the planning permission is given to the development/use under application. It does not condone any other development/use (i.e. open storage of construction machinery and miscellaneous items) which currently exists on the Site but not covered by the application. Immediate action should be taken to discontinue such development/use not covered by the permission;
- (e) to note the comments of the District Lands Officer/Yuen Long, Lands Department (DLO/YL, LandsD) that:

- (i) the Site comprises Government Land (GL) and Old Schedule Agricultural Lots 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 the occupation of the GL (about 248m² subject to verification) included in the Site. Any occupation of GL without the Government's prior approval is an offence under Cap. 28;

- (ii) the lot within the Site is covered by Short Term Waiver (STW) listed below; and

Lot No. in D.D. 129	STW No.	Purposes
1669	5983	Temporary open storage of construction materials and ancillary uses as may be approved by DLO/YL

- (iii) the lot owner(s) shall apply to his office for STW(s) and Short Term Tenancy(s) (STT(s)) to permit the structure(s) erected or to be erected within the subject lots, if any and the occupation of GL. The STW holder(s) will need to apply to his office for modification of the existing STW(s) conditions where appropriate. The application(s) for STW(s) 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;
- (f) to note the comments of the Commissioner for Transport that:
 - (i) sufficient manoeuvring spaces shall be provided within the Site or its adjacent areas. No vehicles are allowed to queue back to public roads or reverse onto/from public roads; and
 - (ii) the local tracks leading to the Site are not under the Transport Department's purview. The applicant shall obtain consent of the owners/managing departments of the local tracks for using them as the vehicular accesses to the Site;
 - (g) to note the comments of the Chief Highway Engineer/New Territories West, Highways Department (CHE/NTW, HyD) that:

- (i) the accesses leading from Deep Bay Road to the Site are not currently maintained by HyD and HyD is not going to take up the maintenance responsibility of the accesses; and
 - (ii) adequate drainage measures shall be provided to prevent surface water running from the Site to the nearby public roads and drains;
- (h) to note the comments of the Director of Environmental Protection (DEP) that no vehicle exceeding 5.5 tonnes, including medium goods vehicle, heavy goods vehicle and container trailer/tractor, as defined in the Road Traffic Ordinance, is allowed to enter/exit or to be parked/stored at the Site at any time during the planning approval period. The applicant is also advised:
- (i) to follow the latest 'Code of Practice on Handling the Environmental Aspects of Temporary Uses and Open Storage Sites';
 - (ii) to follow the relevant guidelines and requirements in relevant Professional Persons Environmental Consultative Committee Practice Notes (ProPECCPNs). If septic tank and soakaway system will be used in case of unavailability of public sewer, its design and construction shall follow the requirements of ProPECCPN 1/23 "Drainage Plans subject to Comment by the Environmental Protection Department" including completion of percolation test and certification by Authorised Person;
 - (iii) to provide adequate supporting infrastructure/facilities for proper collection, treatment and disposal of waste/wastewater generated from the proposed use; and
 - (iv) to meet the statutory requirements under relevant environmental legislation;
- (i) to note the comments of the Chief Engineer/Mainland North, Drainage Services Department (CE/MN, DSD) that:
- (i) the applicant should advise whether any site formation or levelling works will be carried out under the application. Cross-sections showing the existing and proposed ground levels of the development with respect to the adjacent areas should be provided;
 - (ii) as the invert level differences between CP3 and CP6, as well as between CP7 and CP11, exceed 600mm, backdrop manholes should be provided instead of downpipes;
 - (iii) the connection details at the discharge point should be provided and the specific levels (e.g. cover level, invert level and catchpit/watercourse bottom level) should be indicated on the drawing;
 - (iv) the existing 600mm pipe, ditch, and its downstream section, to which the applicant proposes to discharge stormwater from the Site, are not maintained by her Office. The applicant shall resolve any conflicts or disagreements arisen from discharging runoff from the Site into the proposed discharge point. Furthermore, the applicant shall ensure that this drainage system, as well as the existing downstream drains, channels and streams, have adequate capacity to convey the additional runoff from the Site. Regular maintenance shall be carried out by the applicant to prevent any blockage of the system;
 - (v) further to item (iv) above, since there is no record of the said discharge path, site photos taken from various locations and angle should be provided to demonstrate its existence and current condition;
 - (vi) the development shall neither obstruct overland flow nor adversely affect existing natural

streams, village drains, ditches, or adjacent areas; and

- (vii) the applicant shall resolve any conflicts or disagreements with the relevant lot owners and seek permission from DLO/YL for laying new drains or channels and/or modifying or upgrading existing ones in other private lots or on GL outside the Site, where required;
- (j) to note the comments of the Project Manager (West), Civil Engineering and Development Department (PM(W), CEDD) that the Site falls within the study area of Lau Fau Shan Development under the Consultancy Agreement No. CE 5/2024 (CE) “Developments at Lau Fau Shan, Tsim Bei Tsui and Pak Nai Areas - Investigation”, which is the Investigation Study and jointly commissioned by the Planning Department and CEDD. The implementation and land resumption/clearance programme of the Lau Fau Shan, Tsim Bei Tsui and Pak Nai Developments is currently being reviewed under the Investigation Study and subject to change. If the planning application is granted, notwithstanding the validity period of the planning permission, the applicant should be reminded that the Site may be resumed at any time during the planning approval period for potential development project and be advised not to carry out any substantial works therein;
- (k) to note the comments of the Head of Geotechnical Engineering Office (H(GEO)), CEDD that should there be any proposed building works, the proposed building works should be submitted to the Buildings Department (BD) for approval as required under the provisions of the Buildings Ordinance (BO);
- (l) to note the comments of the Director of Fire Services (D of FS) that:
 - (i) for enclosed structure with gross floor area not exceeding 230m², portable fire extinguisher and stand-alone fire detector shall be provided;
 - (ii) in relation to item (i) 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;
 - (iii) stand-alone fire detectors shall be provided in accordance with the “Stand-alone Fire Detector General Guidelines on Purchase, Installation & Maintenance [Sep 2021]”;
 - (iv) provision of fire service installations shall be demonstrated in the form of FS Notes with all relevant standards and specifications;
 - (v) for open storage area which does not involve the erection of enclosed structures, the number of fire extinguisher required to be provided = [Storage Area (m²)] x [0.003]; and
 - (vi) if the proposed structures are required to comply with the BO (Cap. 123), detailed fire safety requirements will be formulated upon receipt of the formal submission of general building plans; and
- (m) to note the comments of the Chief Building Surveyor/New Territories West (CBS/NTW), BD that:
 - (i) 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;
 - (ii) 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 building plan submission stage;

- (iii) if the existing structures (not being a New Territories Exempted House) are erected on leased land without the approval of the Building Authority, they are unauthorised building works (UBW) under the BO and should not be designated for any proposed use under the application;
- (iv) 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;
- (v) any temporary shelters or converted containers for office, storage, washroom or other uses are considered as temporary buildings and subject to the control of Part VII of the B(P)R;
- (vi) the 6m high structures are considered excessive. They should be justified upon formal plan submission to BD; and
- (vii) detailed comments under the BO will be provided at building plan submission stage.

主題：反對臨時建築材料倉申請

規劃委員會：

我謹此致函，表達對反對臨時建築材料倉申請 A/YL-LFS/625

尊敬的規劃委員會：

我謹此致函，表達對 **A/YL-LFS/625** 的臨時建築材料倉申請的強烈反對。

事由 申請人欲於設立臨時建築材料倉，惟該地點交通、環境及安全均存在重大隱患，居民普遍憂慮。

理由

1. **交通安全隱患**：該倉庫位置僅有單程狹窄道路通行，如此大面積的建築材料倉，車輛必頻繁進出。將導致擁堵。

而且，附近倉庫林立，多由狹窄小路（多是單程路）通往深灣路再到流浮山道，交通壓力已十分嚴重。常塞車。並增加交通事故風險。
2. **火災風險高企**：倉庫鄰近墳地規劃，村民常有焚燒冥錢的習俗，加上該地風勢強勁，火源極易蔓延，若倉庫存放大量建材，火災後果不堪設想。
3. **阻礙村民傳統活動**：現址並非空置，已建設閘門阻擋村民通往附近墳地進行拜祭，(要叫佢地開門)，嚴重影響村民的傳統習俗與宗教自由。
4. **環境與居民安全**：倉庫運作極易產生噪音、危險及意外，而且地處偏僻，一旦發生事故，村民甚至難以準確報告地址求助或施救，延誤救援。
5. **渠務與天災風險**：近年時有大雨、打風及惡劣天氣，該地渠務設施不足，並缺乏管理反有效排水，若倉庫設立，極易因積水或倒塌造成嚴重災害。
6. **難以規管**：現址並非空置，常有拖頭及大型貨車出入，運作混亂，難以有效監管，增加安全與環境風險。
7. **土地用途不符**：該地區並非規劃為工業或倉儲用途，臨時倉庫的設立與社區發展方向背道而馳。

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基於以上原因，懇請委員會慎重考慮居民的安全、傳統習俗及福祉，拒絕該項臨時建築材料倉的申請，並加強對該區交通、渠務及土地用途的規劃與監管。

村民們上

20/8/2026



tpbpd/PLAND

寄件者: [REDACTED]
寄件日期: 2026年08月23日星期日 23:48
收件者: tpbpd/PLAND
主旨: A/YL-LFS/625 DD 129 Lau Fau Shan Rec
類別: Internet Email

A/YL-LFS/625

Lot 1667, 1669 and 1671 (Part) and adjoining GL in D.D.129, Lau Fau Shan

Site area: About 4,822sq.m includes Government Land of about 248sq.m

Zoning: "Recreation"

Applied use: Open Storage of Construction Materials / 4 Vehicle Parking

Dear TPB Members,

514 and 515 approved 19 Apr 2024. Both revoked 19 Oct 2025

516 approved 10 May 2024. Revoked 10 Nov 2025

Solution, amalgamate the sites and gain more time.

Note that drainage is still at planning stage and no reference to fire conditions.

If the board was serious about ensuring that conditions are fulfilled then it would approve applications like this for no more than one year. This would concentrate minds on 'getting the job done'.

However the TPB process is nothing more than a document generating machine with no genuine regard for regulations.

Mary Mulvihill

From: [REDACTED]
To: tpbpd <tpbpd@pland.gov.hk>
Date: Monday, 22 April 2024 3:03 AM HKT
Subject: A/YL-LFS/516 DD 129 Lau Fau Shan Rec

A/YL-LFS/516

Lot 1671 part in D.D.129, Lau Fau Shan

Site area: About 3,470sq.m

Zoning: "Recreation"

Applied use: Open Storage of Construction Materials / 2 Vehicle Parking

Dear TPB Members,

STRONG OBJECTIONS. This application should be considered together with 514 and 515. Combined they represent almost 6,000sq.mts.

No history of previous applications or approvals. These operations extend brownfield use further into Agriculture land close to GB. This is the type of random operations that should be located together in dedicated zones.

The applicant quotes a number of previously approved operations on the same zoning as justification. What should be questioned is the genuine demand for so much open storage and are these operations make efficient use of the land? What is the impact of so much open storage on the local environment, ie drainage, air quality, etc.

Approval encourages the further third world planning formula that is blocking the development of a modern well managed society.

In view of the extensive flooding this week in Guangdong and the heavy rainfall locally, approving these applications on a one by one basis under the 'streamline' ask no questions, rubber stamp process, is an abrogation of the duty on the part of both government depts and board members to consider the bigger picture and the need to rein in the expansion of open storage.

Mary Mulvihill

致：城市規劃委員會秘書處

事由：反對申請編號 A/YL-LFS/625—露天存放建築材料用途

敬啟者：

附近村民，現就上述規劃申請提出反對，理由如下：

一、對周邊環境造成重大影響

申請人擬將有關土地改變用途，用作露天存放建築材料及相關物料。該用途涉及大規模物料堆放、貨車及工程車進出，容易造成揚塵、噪音、泥濘、廢物及視覺滋擾，破壞現有鄉郊環境及附近居民的生活質素。

有關地點本身並非適合進行大規模露天貯物的工業用地，若批准申請，可能令同類用途在附近逐步擴散，形成累積性環境及交通影響。

二、申請規模過大及有分拆申請之疑慮

據了解，申請人及相關項目將相關土地或工程分開提出申請。然而，若各宗申請實際上屬於同一項大型發展計劃，便不應只分開審視每一宗申請，而應從整體規模、總面積、貨車流量、物料數量及對周邊環境的累積影響作全面評估。

即使每宗申請表面上規模有限，合併後的實際操作規模可能遠超附近地區的承受能力，亦可能造成「以分拆方式規避整體規劃審查」的疑慮，故促請城規會要求申請人清楚交代所有相關地段、申請之間的關係及整體發展計劃。

三、影響村民出入、祭祖及日常活動

有關地點附近有村民住宅、通道及可能用作祭祖、或其他傳統活動的土地。大型工程車及貨車長期進出，會增加道路阻塞、噪音、塵土及交通意外風險，並可能阻礙村民前往祖先墓地或進行祭祖活動。

如申請獲批，村民可能需要與重型車輛共用狹窄或鄉郊道路，對長者、兒童、行人及其他道路使用者尤其不安全。

四、惡劣天氣下的交通及工程安全風險

在暴雨、雷暴、強風或颱風等惡劣天氣下，工程車輛在鄉郊道路及不平整地面上行駛，容易出現打滑、失控、翻側、泥濘外溢及物料散落等情況。

如場地沒有完善的排水、路面加固、車輛管理及防洪安排，暴雨期間更可能造成路面積水、泥土流失及周邊土地受污染。申請人應先提交具體的交通管理、排水及惡劣天氣應變方案，而不應只以一般承諾作為依據。

五、地勢不平，不適合大規模露天貯物

申請地點地勢不平，部分位置可能存在斜坡、低窪、填土或地基承载力不足等問題。若在沒有清楚展示地盤平整、地基加固、斜坡穩定及排水設計的情況下堆放大量建築材料，物料可能移位、倒塌或滾落，對工作人員、居民及道路使用者構成危險。

因此，申請人應提供由合資格專業人士核證的地盤平面圖、地形測量、地基及斜坡穩定評估，以及物料堆放高度和安全距離資料。

六、火災及緊急救援風險

建築材料、包裝物料、木材、塑膠及其他可燃物品如大量露天堆放，會增加火災風險。一旦發生火警，密集堆放的物料可能令火勢迅速蔓延，並產生濃煙及有害氣體。

此外，現場所稱的水源、消防喉及消防車通道是否足夠，仍有重大疑問。若道路狹窄、地面不平、場內堆放物阻塞通道，消防車及救援人員可能難以迅速進入現場。申請人必須先取得消防處及其他相關部門對消防水源、消防車通道、緊急出口、滅火設備及物料分類的明確意見。

七、對排水及附近土地的潛在影響

大規模填土、地面硬化及物料堆放可能改變天然排水方向，令雨水集中流向鄰近住宅、農地、道路或低窪位置，增加水浸及泥土沖刷風險。

本人／我們促請城規會要求申請人提交完整的排水及雨水管理方案，包括場內排水渠、沉砂設施、截水措施及暴雨期間的應變安排。在相關資料未獲充分證實前，不應批准申請。

懇請城市規劃委員會充分考慮附近村民的安全、環境及傳統生活需要，否決上述申請。

此致

城市規劃委員會

鰲磡村民

8 月 25 日 2026 年