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Esther Hiu Laam LI/PLAND

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 寄件日期: 2026年07月09日星期四 16:10
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 主旨: Consolidated Response to Comments A/NE-FTA/283
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Dear Ms Li,

Consolidated Response to Comments from the Director of Northern Metropolis Co-ordination Office, Transport Department and Public Comments

We refer to your email dated 3 July 2026 enclosing the comments from the Transport Department regarding the captioned planning application, and the relevant comments received from the Director of Northern Metropolis Co-ordination Office, Development Bureau and the public comments received in relation to the application.

We would also like to express our sincere appreciation for your professional handling of the application, timely coordination with the relevant parties, and clear communication throughout the process. Your assistance has been very helpful in enabling us to understand and respond to the relevant comments in an organised manner.

Our consolidated responses are set out below. The supporting documents referred to in this letter are listed at the end for your further consideration.

Background and Relocation Need

By way of background, our vehicle-related business has been operating in Hong Kong for about 40 years. The present application is not intended to introduce a new type of operation to the area, but to facilitate the orderly continuation and relocation of our existing vehicle-related business operations, including vehicle trading, vehicle repair and vehicle rental related services.

Our existing operation has been affected by the Government's development and land resumption arrangements in the North District / Northern Metropolis area. We understand and support the overall Government development programme, and we have been cooperating with the relevant Government departments in relation to the relocation and re-establishment of the affected operation.

In order to continue the existing business in a proper and managed manner, a suitable site is required to accommodate the repair workshop, vehicle sale / rental areas, parking, storage, internal circulation and manoeuvring space. The application site is therefore proposed to consolidate these affected operations within one properly planned site, with appropriate traffic, environmental and site management measures.

Part A - Response to Director of Northern Metropolis Co-ordination Office Comments

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Departmental Comment 1. details of the affected businesses, including their names, nature of operation, and location, together with information demonstrating that they are existing operator;

Response:

The affected businesses comprise three associated companies carrying out vehicle-related operations, namely Tung Heng Vehicles Limited, Tung Heng Cars Co Limited and Easy Vehicle Rent Limited. Tung Heng Vehicles Limited is the principal company making the application and is principally engaged in vehicle trading / dealing and related vehicle business. Tung Heng Cars Co Limited is engaged in vehicle repair. Easy Vehicle Rent Limited is engaged in car rental, vehicle trading and repairing.

Business Registration records of the three companies are enclosed to demonstrate their existence and respective business nature (Supporting Documents 1 to 3). The actual affected operation and location are further supported by the GeoInfo Map extract and the relevant land resumption plan / notice with our highlighted affected operation area (Supporting Documents 4 and 5).

Departmental Comment 2. should the names of these affected business be different from the applicant, reason(s) for not submitting the application under the name of the existing operators and information demonstrating that the application site, if approved, will be used for accommodating the said affected businesses;

Response:

The current application is submitted by Tung Heng Vehicles Limited, which is one of the affected existing operators. The other affected businesses, namely Tung Heng Cars Co Limited and Easy Vehicle Rent Limited, are associated companies carrying out related vehicle business operations, including vehicle repair and vehicle rental. We confirm that Tung Heng Vehicles Limited and Tung Heng Cars Co Limited are owned by the same person, while Easy Vehicle Rent Limited is owned by a direct family member. The three companies therefore form part of the same associated vehicle-related business operation.

The application is submitted under the name of Tung Heng Vehicles Limited as the principal applicant and coordinating party for the proposed relocation and re-establishment of the associated vehicle-related operations. The three affected businesses are closely related in operation, and their respective business activities are complementary to the applied use, namely vehicle trading, vehicle repair and vehicle rental.

If the application is approved, the application site will be used to accommodate the affected operations of the said associated businesses. This is reflected in the applied use under the current application, which includes temporary motor vehicle repair workshop and shop and services for vehicle trading and rental, with ancillary office and related facilities. The submitted layout also includes areas for vehicle sale, vehicle rental, repair workshop and parking / circulation for medium and heavy goods vehicles (Supporting Document 6).

Business Registration records are provided to demonstrate the existence and business nature of the three affected companies (Supporting Documents 1 to 3). The submitted layout plan, GeoInfo Map extract and relevant land resumption plan / notice are provided to demonstrate that the application site is intended to accommodate the affected vehicle-related operations, and to support the relocation need (Supporting Documents 4 to 6). Further supporting information can be provided upon request, if required by the relevant departments.

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Departmental Comment 3. whether a site search has been conducted with a view to identifying a suitable site for reestablishment of the affected business operation;

Response:

We have explored available options for re-establishing the affected vehicle-related operation. In identifying a suitable relocation site, we have taken into account the operational requirements of the businesses, including direct vehicular access for medium and heavy goods vehicles, sufficient manoeuvring and parking space, compatibility with vehicle repair, trading and rental uses, and the need to minimise disturbance to nearby sensitive uses.

We consider the application site suitable for re-establishment of the affected operation as it is accessible from Man Kam To Road, is related to the previously approved planning application site, and is capable of accommodating the required repair workshop, vehicle sale / rental areas, parking spaces and internal circulation for medium and heavy goods vehicles. Due to the specific operational requirements of the affected businesses, suitable relocation sites are limited. The application site is therefore considered a practical and appropriate site for accommodating the affected businesses.

Departmental Comment 4. provide more information to justify the area required for relocation, whether it is comparable to its original operation area/premises at Fanling North New Development Area.

Response:

The applied area is required to accommodate the relocation and re-establishment of the affected vehicle-related operations, including vehicle repair, vehicle trading, vehicle rental, ancillary office / storage uses, parking, internal circulation and manoeuvring space for medium and heavy goods vehicles.

The application site has an area of about 10,453.86 sq.m., with about 1,551 sq.m. of covered structures and the remaining area mainly used for open-air parking, circulation and manoeuvring. A total of 47 parking spaces are proposed for private cars, medium goods vehicles, heavy goods vehicles and an articulated vehicle. Given the nature of the operation, a substantial open area is required to allow safe movement, parking and handling of medium / heavy goods vehicles within the site, and to avoid queuing or parking on public roads.

Based on the red marked areas shown on the enclosed GeoInfo Map extract (Supporting Document 4), the original affected operation area is about 9,939.54 sq.m (The difference from the previously stated size. is due to the current figure being calculated based on the total operational area used, rather than only the Government land portion.). The application site area of about 10,453.86 sq.m. is therefore broadly comparable to the original affected operation area, being about 514.32 sq.m., or approximately 5.2%, larger. The slight increase is considered necessary and reasonable to provide adequate internal circulation, parking and manoeuvring space, and to consolidate the affected operations within one properly planned site.

Part B - Response to Transport Department Comments

Transport Department Comment (i) The applicant should advise and substantiate the traffic generation from and attraction to the application site and the traffic impact to the nearby road links and junctions.

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Response:

The proposed development is a temporary vehicle repair workshop, showroom and ancillary office. The operation is similar in nature to our existing business and previously approved operation under Application No. A/NE-FTA/267.

The estimated daily traffic generation and attraction is approximately 130 vehicle movements per day, comprising about 65 arrivals and 65 departures during the operating hours from 9:00 a.m. to 6:00 p.m. The average traffic flow is about 13 to 14 vehicle movements per hour, with higher movements expected during the morning opening period and late afternoon period. The traffic generated is considered manageable and would not cause material adverse traffic impact on Man Kam To Road or nearby road links and junctions.

Estimated traffic movements:

Time Slot	Arrivals	Departures	Total
9:00 - 10:00	15	10	25
10:00 - 11:00	8	5	13
11:00 - 12:00	8	5	13
12:00 - 13:00	5	5	10
13:00 - 14:00	5	5	10
14:00 - 15:00	6	6	12
15:00 - 16:00	5	7	12
16:00 - 17:00	8	12	20
17:00 - 18:00	5	10	15
Total	65	65	130

Transport Department Comment (ii) It is noted that the size of parking space for articulated container vehicle is same as medium goods vehicle. The applicant shall review and revise the parking spaces for articulated container vehicles that should have a stall dimension of 16m x 3.5m.

Response:

Noted. The parking stall for articulated container vehicle has been revised to 16m x 3.5m. Please refer to the attached revised layout plan and swept path analysis drawing for the updated arrangement.

Transport Department Comment (iii) The applicant shall demonstrate the satisfactory manoeuvring of articulated container vehicles and medium / heavy goods vehicles, with a design dimension of 16m x 2.5m and 11m x 2.5m respectively, entering and exiting the Site, manoeuvring within the Site and into / out of the parking and loading / unloading spaces, preferably using swept path analysis.

Response:

Noted. Swept path analysis has been prepared for the articulated container vehicle with a design dimension of 16m x 2.5m, which is the largest design vehicle among the vehicle types concerned. The swept path analysis demonstrates that the articulated container vehicle can enter and exit the Site, manoeuvre within the Site, and move into / out of the parking and loading / unloading spaces satisfactorily.

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As the medium / heavy goods vehicle with a design dimension of 11m x 2.5m is smaller than the articulated container vehicle, its manoeuvring requirement is considered to be covered by the swept path analysis of the larger articulated container vehicle. Please refer to the attached swept path analysis drawing for consideration.

Should the Transport Department consider that a separate swept path analysis for medium / heavy goods vehicle is required, we would be pleased to provide further information accordingly.

Transport Department Comment (iv) The applicant shall advise the provision of pedestrian facilities and management measures to ensure pedestrian safety.

Response:

To ensure pedestrian safety, a barrier gate will be provided at the site entrance / exit. Flashing lights, audible warning signals and warning signs will be installed to alert pedestrians and drivers of vehicle movements. Vehicle movements at the entrance / exit will be managed through appointment arrangements, barrier gate operation and clear warning devices.

Transport Department Comment (v) The applicant shall advise the management / control measures to be implemented to ensure no queuing of vehicles outside the Site.

Response:

Vehicle arrivals will be managed by appointment and internal site arrangements. Sufficient internal manoeuvring and waiting space will be maintained within the Site. Vehicles will not be allowed to queue outside the Site or obstruct the nearby access road.

Transport Department Comment (vi) The applicant shall advise the measures for preventing illegal parking of visitors' vehicles outside the Site.

Response:

Designated parking spaces will be provided within the Site for visitors and customers. Clear signage and visitor instructions will be provided to remind visitors not to park illegally outside the Site and to use the designated parking spaces within the Site.

Transport Department Comment (vii) The proposed vehicular access between Man Kam To Road and the application site is not managed by Transport Department. The applicant should seek comments from the responsible party.

Response:

Noted. We will seek comments / agreement from the relevant responsible party regarding the use and management of the proposed vehicular access between Man Kam To Road and the application site where necessary.

We will implement and maintain the proposed traffic management measures throughout the approval period, subject to the relevant approval conditions and requirements of the concerned departments.

Part C - Response to Public Comments

We have read the public comments received in relation to the application and are grateful for the comments and concerns raised by the public parties. We understand the importance of addressing local

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concerns properly and will operate the proposed development in a responsible and well-managed manner.

Having reviewed the public comments, we understand that the main concerns are related to traffic and road safety, and possible environmental nuisance such as noise, dust and pollution arising from the workshop operation.

Concern 1: Traffic and road safety Some public comments expressed concern that the proposed use may generate additional vehicle movements, including goods vehicles, and may affect road safety in the surrounding area.

Response:

We will manage vehicle movements carefully. Vehicle arrivals will be arranged by appointment and internal site arrangements, and sufficient internal manoeuvring and waiting space will be maintained within the Site. Vehicles will not be allowed to queue outside the Site or obstruct the nearby access road.

One of the key purposes of the application is to provide sufficient internal space for vehicle parking, manoeuvring and circulation within our premises. This will allow vehicles to be moved between different parts of the Site, including the lower and upper levels, within the premises as far as practicable, instead of relying on public roads for vehicle circulation or temporary parking. This arrangement will help reduce unnecessary use of nearby public roads by our operation.

A swept path analysis has been prepared for the articulated container vehicle, being the largest design vehicle concerned, to demonstrate that vehicles can enter and exit the Site and manoeuvre within the Site satisfactorily. We will also provide traffic management measures at the entrance / exit, including warning signs, flashing lights, audible warning signals and a barrier gate where appropriate, to enhance pedestrian and road safety.

Concern 2: Noise, dust and possible environmental nuisance Some public comments expressed concern that the workshop operation may cause noise, dust, air pollution, waste or other nuisance to the surrounding area.

Response:

We understand these concerns and will implement mitigation and good site management measures. Each workshop within the Site will be enclosed by walls as far as practicable, so as to contain the workshop activities and reduce possible noise, dust and other environmental nuisance to the surrounding area.

Repair and workshop activities will be carried out within the enclosed workshop areas as far as practicable. We will maintain the Site in a clean and tidy condition and adopt good housekeeping practices throughout the operation.

Chemical waste generated from the workshop operation will be properly collected and handled by a certified contractor in accordance with the relevant environmental requirements. Metal parts and scrap materials will also be sorted and recycled where practicable. We will follow the principles of reduce, reuse and recycle where practicable, including recycling metal materials and reusing suitable parts or materials in the operation.

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We will continue to cooperate with the Planning Department and relevant Government departments, and will comply with the relevant approval conditions if planning permission is granted.

Supporting Documents

1. Business Registration record of Tung Heng Vehicles Limited
2. Business Registration record of Tung Heng Cars Co Limited
3. Business Registration record of Easy Vehicle Rent Limited
4. GeoInfo Map extract showing the existing / affected operation area
5. Relevant land resumption plan / notice with our highlighted affected operation area
6. Revised layout plan showing repair workshop, vehicle sale / rental areas, parking / circulation areas and swept path analysis for articulated container vehicle 16m x 3.5m

We trust that the above information is in order. Should you require any further information or clarification, please let us know.

Yours faithfully,

For and on behalf of

Tung Heng Vehicles Limited