

11 December 2025

The Secretary
Town Planning Board
c/o Planning Department
15/F North Point Government Offices
333 Java Road
Hong Kong

By Fax and Email

Dear Sir

Section 16 Planning Application for Proposed Residential Development with Minor Relaxation of Plot Ratio Restriction at Lots 1027, 1029, 1030, 1034A, 1034B, 1039 (Part), 1040, 1042 RP, 1043 RP, 1044 RP (Part), 1045, 1047, 2233 (Part), 2251 S.A RP, 2256 RP, 2315 (Part) and 2316 RP (Part) in D.D. 92 and Adjoining Government Land (New Lot to be known as Lot 2644 in D.D. 92), Kwu Tung South, Sheung Shui, the New Territories (Application No. A/NE-KTS/565)

Reference is made to the captioned application submitted to the Town Planning Board (the Board) on 2 September 2025 and the Further Information submitted to the Board on 5 December 2025.

Further to the discussion between Transport Department and our traffic consultant, we would like to submit replacement pages of the Responses-to-Comments table (**Appendix A**) and replacement pages of the Traffic Impact Assessment (TIA) (**Appendix B**) supplementing further information related to public transport services for clarification purpose only for the Board's consideration. There is no material change to the TIA and no change to the conclusion made.

Thank you for your kind attention. Should there be any queries, please do not hesitate to contact the undersigned at 2957 9602 or our Mr. Arnold Koon at 2957 9667 / Miss Cody Yu at 2957 9615.

Yours faithfully
for Llewelyn-Davies Hong Kong Ltd



Winnie Wu
Planning Director

WW/AK/cy
Encl

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cc (w/encl)
DPO/FSS&YLE - Ms. Kirstie Law, Ms. Florence Siu; Mr. Edmond Chan (by email)

Appendix A

Replacement Pages of Responses-to-Comments Table

	Departmental Comments	Responses to Comments																								
	<ul style="list-style-type: none"> To achieve the long-term target of attaining zero vehicular emissions in the transport sector, the use of electric / new energy buses with carrying capacity of about 120 passengers is expected. Besides, if the occupancy is over 75%, the service level of the proposed franchised bus route should be enhanced according to the guideline. Please revisit by assuming the capacity of double-decker buses as 120 with 75% maximum capacity. 	<ul style="list-style-type: none"> Whilst the more conservative public transport demand is adopted from the sensitivity test in R-to-C Item 7.24, the anticipated service level of 12.8m double-decker (DD) bus are reviewed to be 120 passengers with 75% maximum capacity per bus for the future use of electric / new energy buses. 																								
7.29	R-to-C Item 4.36 and Para. 6.2.2: Please revisit above comment and then reach a new conclusion.	<p>For the worst-case scenario of public transport assessment, the more conservative public transport demand in R-to-C Item 7.24 and the discounted public transport capacity in R-to-C Item 7.28 are both adopted in the sensitivity test as shown in Table 5.5 in the TIA under Appendix H and extracted below:</p> <table border="1"> <thead> <tr> <th>Private Residential Developments</th> <th>Anticipated Population Intake</th> <th>Passenger Demand (pax/hr)</th> </tr> </thead> <tbody> <tr> <td>Application Site at Hang Tau Road</td> <td>2,868 residents</td> <td>455</td> </tr> <tr> <td>Other Planned Developments</td> <td>10,600 residents</td> <td>1,290</td> </tr> <tr> <td>Total</td> <td>13,468 residents</td> <td>1,745</td> </tr> <tr> <th>Public Transport Service</th> <th>Anticipated Service Level</th> <th>Public Transport Capacity (pax/hr)</th> </tr> <tr> <td>Short-Working Route of GMB 50K (Hang Tau Road – Sheung Shui)</td> <td>10-minute headway (6 nos. of 19-seater GMB)</td> <td>$19 \times 6 = 110$ pax/hour</td> </tr> <tr> <td>New Franchised Bus Route (Kam Hang Road – Kwu Tung Station)</td> <td>3.75-minute headway (16 nos. of 12.8m DD bus)</td> <td>$120 \times 16 \times 75\% = 1,440$ pax/hour</td> </tr> <tr> <td>Spare Capacity of Existing Route 76K</td> <td>20-minute headway (3 nos. of 12m DD)</td> <td>$120 \times 3 \times 75\% - 70$ (existing)</td> </tr> </tbody> </table>	Private Residential Developments	Anticipated Population Intake	Passenger Demand (pax/hr)	Application Site at Hang Tau Road	2,868 residents	455	Other Planned Developments	10,600 residents	1,290	Total	13,468 residents	1,745	Public Transport Service	Anticipated Service Level	Public Transport Capacity (pax/hr)	Short-Working Route of GMB 50K (Hang Tau Road – Sheung Shui)	10-minute headway (6 nos. of 19-seater GMB)	$19 \times 6 = 110$ pax/hour	New Franchised Bus Route (Kam Hang Road – Kwu Tung Station)	3.75-minute headway (16 nos. of 12.8m DD bus)	$120 \times 16 \times 75\% = 1,440$ pax/hour	Spare Capacity of Existing Route 76K	20-minute headway (3 nos. of 12m DD)	$120 \times 3 \times 75\% - 70$ (existing)
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Departmental Comments		Responses to Comments				
		(Ching Ho Estate – Long Ping Estate)	bus	= 200 pax/hour		
		Total		1,750		
			It can be shown that the service levels of existing and proposed Bus & GMB route(s) can adequately serve the anticipated public transport demand in Kwu Tung South. As such, there is <u>no change to the conclusion</u> in the TIA.			
7.30	R-to-C Item 4.37 and Drawing 3.1: Please refer to the comment of item 4.33.	As per R-to-C Item 7.26, please be clarified that the Bus / GMB layby at Kam Hang Road is proposed under the <u>approved S16 Planning Application (No. A/NE-KTS/506)</u> by OTHERS.				
8.	Comments from Highways Department					
8.1	The cross-sections as shown in RtoC table do not match with the plan in Drawing Nos. 3.1 and 3.2 of the Traffic Impact Assessment. Please clearly indicate the proposed footpath and carriageway to be widened in the plan.	<p>With reference to the approved S12A Planning Application (No. Y/NE-KTS/15), the proposed extent of road improvement works will be covered by the “Setback Area” along Hang Tau Road abutting the Application Site.</p> <p>As shown by the relevant plan and cross sections in Drawing No. 3.3 in the TIA enclosed under Appendix H, the proposed setback areas are indicated for the road improvement works along Hang Tau Road, which includes:</p> <ul style="list-style-type: none"> - 7.3m carriageway - 2.0m footpath abutting site boundary - A GMB layby on Hang Tau Road - A cautionary pedestrian crossing across Hang Tau Road <p>Further details of road drain and public lighting design will be submitted with the General Building Plans following the approval of S16 planning</p>				

Appendix B

Replacement Pages of Traffic Impact Assessment

Proposed Enhancement to Public Transport Services by the Subject Application Site

5.2.9 For minimizing disturbance to the traffic on Hang Tau Road due to the kerbside passengers' boarding and alighting of GMBs while providing proper waiting spaces for the GMB users, an on-street GMB layby is proposed at Hang Tau Road for the short-working route of GMB 50K, assuming with a 10-minute headway during peak hours. The temporary GMB turnaround near Hang Tau Road Public Toilet has also been identified in **Para. 4.2.4 – 4.2.6** of this TIA, in case of any programme mismatch for the permanent GMB turnaround by OTHERS.

5.2.10 A pedestrian crossing is also proposed between the GMB lay-by and the Application Site Access at Hang Tau Road to cope with the potential crossing demand as shown in **Drawings 3.2**.

Proposed Enhancement to Public Transport Services by OTHER Developments

5.2.11 In addition to the new GMB facilities at Hang Tau Road, the Application Site is within the 400m walking distance from Kam Hang Road, which will be viable for 12.8m double decker buses with the proposed and approved road widening under S16 Planning Application (No. A/NE-KTS/506) as shown in **Drawing 4.1 and 4.2**.

5.2.12 With the public transport facilities proposed at Kam Hang Road, new franchised bus route between Kwu Tung South and the future Kwu Tung Station can be considered with rail connections to East Rail Line in 2027 and the Northern Link (NOL) in 2034 respectively. Not only the accessibility of Kwu Tung south area can be improved, but also relief the burden of Public Transport Interchange at existing Sheung Shui Station.

5.2.13 The additional travel demand of the planned developments in Kwu Tung South (including the Application Site) can be sufficiently served by **16 nos. of 12.8m double decker buses per hour (i.e. peak frequency of 3.75 minutes)** during the peak hour. It will benefit the existing residents at Kwu Tung South with an increase of PT choice in the area.

5.2.14 The spare capacity of Bus Route 76K can also be utilized to serve part of the public transport demand arising from the proposed and planned developments in Kwu Tung South.

Overview of Public Transport Services in Kwu Tung South in Year 2035

5.2.15 The tentative short-working GMB 50K and Franchised Bus routes are indicated on **Drawing 5.2**. The proposed enhancement to public transport services during peak hours for the private residential development are summarised in **Table 5.5** below.

Table 5.5 Proposed Enhancement to Public Transport Services in Year 2035

Private Residential Developments	Anticipated Population Intake	Passenger Demand (pax/hr)
Application Site at Hang Tau Road	2,868 residents	455
Other Planned Developments in Kwu Tung South	10,600 residents	1,290
Total in Kwu Tung South	13,468 residents	1,745
Public Transport Service	Anticipated Service Level	Public Transport Capacity (pax/hr)
Proposed Enhancement to Public Transport Services by the Subject Application Site		
Short-Working Route of GMB 50K ⁽¹⁾ (Hang Tau Road – Sheung Shui)	10-minute headway (6 nos. of 19-seater GMB)	110
Proposed Enhancement to Public Transport Services by the OTHER Developments		
New Franchised Bus Route ⁽²⁾ (Kam Hang Road – Kwu Tung Station)	3.75-minute headway (16 nos. of 12.8m DD bus) ⁽³⁾	1,440
Spare Capacity of Existing Bus Route 76K (Ching Ho Estate – Long Ping Estate)	20-minute headway (3 nos. of 12m DD bus) ⁽⁴⁾	200
	Total	1,750

Notes:

- (1) The additional GMB at Hang Tau Road is assumed as a short-working route of GMB 50K with a service level of 10 minute headway in peak hours
- (2) The new franchised bus route at Kam Hang Road is assumed for a service level of 4-5 minute headway in peak hours.
- (3) The capacity of 12.8m double-decker (DD) bus is assumed to be 120 passengers with 75% maximum capacity.
- (4) The spare capacity of bus route 76K is assumed to be 250 passengers with an average occupancy of 30%.

5.2.16 It can be shown that the proposed service levels of existing and proposed Bus & GMB route(s) can adequately serve the anticipated public transport demand in Kwu Tung South.