Response-to-Comment (RtC)

Proposed Temporary Public Vehicle Park (excluding Container Vehicle)
and Associated Filling of Land for a Period of 3 Years in "Agriculture" Zone,
Lots 1488 (Part) and 1489 (Part) in D.D. 83, Lung Yeuk Tau, Fanling, New Territories

(S.16 Application No. A/NE-LYT/882)

(i) An RtC table:

Departmental Comments		Applicant's Responses
1. Comments of the District Lands Officer/North, Lands Department (DLO/N, LandsD)		
(a)	The application site (the Site) comprises Old Schedule Agricultural Lots 1488 (Part) and 1489 (Part) in D.D. 83 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. Besides, according to the vehicular access plan of the planning statement, the proposed vehicular ingress/egress requires to pass through other private lots, the applicant shall make his own arrangement as there is no such right granted to the Site.	Noted.
(b)	Unlawful occupation of Government land (GL) not covered by the planning application The GL adjoining the said private lot has been fenced off without permission. Please clarify the extent of the application site with the applicant. His office reserves the rights to take necessary land control action against the illegal occupation of GL without further notice. The lot owner shall realign the fence and cease the illegal occupation of the adjoining GL not covered by the subject planning application immediately.	Noted. Should the application be approved by the Town Planning Board, the applicant will strictly follow the approved scheme and confine the operation of the proposed development within the site boundary of the application site (the Site).
(c)	The lot owner should comply with all the land filling requirements imposed by relevant Government departments.	Noted.

Departmental Comments		Applicant's Responses
2. Comments of the Commissioner for Transport (C for T)		
(a)	It is noted that the Site is proposed to provide parking spaces for the taxi fleet. However, there are 10 nos. of parking spaces of light goods vehicle (LGV) proposed within the Site. Please explain.	The applicant's fleet comprises various vehicle models. According to the applicant, the body dimension of the largest model (the Premium 6-seater Electrical Vehicles (EV) (specifications enclosed at **Annex 1**) measures 5,490 mm (L) × 1,980 mm (W) × 2,050 mm (H), which would make normal private car parking spaces insufficient to cope with. As such, the applicant opts to sacrifice the number of parking space by converting some of those into larger parking spaces, so as to allow more spaces for the safe manoeuvering of vehicles within the Site.
(b)	There are only 4 trips each for in and out of private cars (i.e. taxi) for a.m. and p.m. shift-changing hours respectively. Please advise whether the estimated trip generation/attraction can reflect the traffic flow at the situation when all parking spaces are fully utilised.	It is anticipated that not all drivers would return to the Site for their shift-changing. Some of them might change their shifts elsewhere. Meanwhile, those taxis which are not in use by the fleet's driver will be stationed at the Site. The estimated trip generation /attraction have already taken the above into account, including the scenario that all parking spaces are fully-utilised, and is considered justifiable.
(c)	It is noted that the local access road leading to the Site is narrow (approximately 4 m in width) and insufficient to accommodate two-way traffic. The applicant should propose mitigation measures to ensure that the vehicles would not clash with other vehicles traveling in reverse direction.	Staff will be deployed to direct incoming/outgoing traffic to ensure road and pedestrian safety.
(d)	Swept path analysis should also be conducted for each type of parking spaces proposed.	Please refer to the swept path analysis conducted for taxi and 6-seater EV taxi at **Annex 2**.
(e)	No vehicle is allowed to queue back to or reverse onto/from public road at any time during the planning approval period.	Noted.
(f)	Sui Wan Road and the local village access road leading to the site from Sui Wan Road are not managed by the Transport Department (TD). The applicant should obtain consent from relevant land owners and maintenance authorities on using these roads.	Noted.

Departmental Comments		Applicant's Responses
3. Comments of the District Planning Officer/Sha Tin, Tai Po and North, Planning Department (DPO/STN, PlanD)		
(a)	With the reference to TD's comments as detailed above and the dimensions for standard parking space for taxi as set out in Table 11 of the Hong Kong Planning Standards and Guidelines (HKPSG) Chapter 8, please justify the proposed provision of 10 LGV-sized parking spaces at the Site.	Please refer to the applicant's response to C for T in Section 2(a) of this table.
(b)	The applicant is advised to substantiate the justifications regarding the suitability of the Site for parking taxis under the taxi fleet.	The proposed development is considered not incompatible with the surrounding areas, which are predominated by temporary structures, parking of vehicle, shop & services for auto-part, car-beauty workshop, etc. Moreover, the proposed development is solely for parking use without any shopfront and workshop activities and erection of structures. The potential significant nuisance to the surrounding areas arising from the proposed development is not anticipated.
(c)	Based on site photos taken during our site inspection on 15.9.2026, the Site was covered with wild vegetation, and a few trees/shrubs of common species were observed. The proposed land filling across the entire Site, as shown on Plan 5 of your submission, may lead to tree felling. This contradicts the Application Form, which states that no tree felling will be involved.	No tree as defined under the Lands Administration Office (LAO) Practice Note (PN) No. 6/2023[1] has been identified thereon. No dead, old, or valuable tree has been found either. As such, no tree felling is involved for the removal of existing vegetation therewithin.
(d)	Please note that the Town Planning Board Secretariat has received a number of public comments objecting to the application on traffic, environmental, drainage, and fire safety grounds. The applicant should take note of these public comments and provide responses as appropriate.	Please refer to Part (ii) below.

(ii) The applicant provides the revised layout plan and revised pages of the Form No. S16-III (**Annex 3**) to clarify the types of parking spaces proposed in the current application.

[1] *With reference to LAO PN No. 6/2023, a plant is considered to be a tree if its trunk diameter measures 95 mm or more at a height of 1.3 m above the ground level.*

(iii) The applicant provides the following information in response to various aspects of the public comments received during the public inspection of the captioned application:

Operational aspect

- the swept path analysis at Annex 2 has demonstrated the smooth manoeuvering of vehicles along the access road between the Site and Sha Tau Kok Road – Lung Yeuk Tau;

- the proposed development involves the operation of a vehicle park for the applicant's own fleets. Given that all drivers under the fleets are registered, and their entrance to the proposed development will be properly recorded, the concerns on gathering of outsiders/unrelated individuals in the vicinity of the Site is not anticipated;

- noting that the private lots of the Site are Old Schedule Lots held under the Block Government Lease, where no structure is allowed without the prior approval of Short Term Waiver (STW) from LandsD. Hence, the provision of EV charging facilities thereon would require the submission of a STW application. Given that all drivers will be required to fully-charge their vehicles before returning to the Site, there is no such need for the provision of EV charging facilities therewithin;

Environmental aspect

- it is estimated that the proposed development would only generate/attract a maximum of 8 trips on an hourly basis during shift-changing hours, whilst that beyond shift-changing hours would be around 4 nos. of trip. Moreover, the additional traffic induced by the proposed development would only involve taxi, i.e. non-heavy vehicles. In view of the low traffic flow and deployment of non-heavy vehicles, the adverse noise and air quality impacts to the surroundings are not anticipated;

Drainage aspect

- should the application be approved by the Town Planning Board (the Board), the applicant will submit a drainage proposal with periphery u-channels and catchpits to alleviate the potential adverse drainage impacts that would have arisen from the proposed development;

- the applicant will implement good practices under *Professional Persons Environmental Consultative Committee Practice Notes 1/23* when maintaining the on-site drainage system at the Site. Hence, the operation of the proposed development should not induce adverse drainage impacts to the area; and

Fire safety aspect

- the applicant will strictly follow the latest *"Fire Safety Requirements (FSRs) for Temporary Storage and Structures under Planning Applications, Short Term Tenancy & Short Term Waiver"* promulgated by the Fire Services Department, under which fire extinguishers will be provided at the proposed development to meet the latest FSRs;

- the applicant will submit the fire service installation proposal, declaration form for the compliance of FSRs and FS251 certificate(s) upon obtaining relevant planning permission from the Board. Hence, the adverse fire safety impact arising from the proposed development is not envisaged; and

- on the issue of pigsties in the vicinity being converted into domestic use, it is advised that the concerned individuals should consult the LandsD in relation to the lease aspect.