



**LCH Planning and Development**  
**Consultants Limited**

Our Ref.: PD2504003/07

Your Ref.:

10 September 2025

By Email

Town Planning Board Secretariat  
15/F, North Point Government Offices,  
333 Java Road,  
North Point,  
Hong Kong

Dear Sir/Madam,

**APPLICATION NO. A/NE-TKLN/102 FOR PERMISSION**  
**UNDER SECTION 16 OF THE TOWN PLANNING ORDINANCE**

**FURTHER INFORMATION**

We refer to the emails enclosing the departmental comments regarding the captioned application.

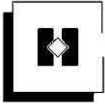
Please find attached our responses to departmental comments and replacement pages of Planning Statement.

In view of Lands Department's comment, we have further updated the proposed layout. The following table summarised the minor changes of the proposed development parameters:

Development Parameter	Original Proposal Submitted under this Application	Latest Proposal under this Further Information	Changes
Site Area (sq.m.)	About 4,628	About 4,628	No change
Covered Area (sq.m.)	About 192	About 204	+3.1%
No. of Structure(s)	2	5	+3
Max. Height of Structures (m)	6	6	No change
Site Coverage (%)	About 4.1	About 4.4	+0.3%
Plot Ratio	About 0.083	About 0.086	+3.6%

This Further Information contains the responses to comments of relevant Government departments and minor changes in proposed plot ratio, covered area and site coverage, with changes not exceeding 10% of the original development parameters. Thus, according to TPB Planning Guideline No. 32B, this Further Information does not result in a material change of the nature of the application and should be accepted by the TPB for inclusion into the application.

Should you require further information or have any query, please feel free to contact the undersigned or Cherie Lee at [REDACTED].



Yours faithfully,  
For and on behalf of  
**LCH Planning & Development Consultants Limited**

**Junior Ho**  
Director

Encl.

c.c. the Applicant

- Response to Comments Table
- Annex 1 – Revised Indicative Layout Plan
- Annex 4 – Revised Traffic Consideration
- Annex 5 – Revised Drainage Proposal
- Annex 6 – Letter to Relevant Government Department
- Annex 7 – Supporting Letters from TKLN Rural Committee and Local Residents
- Replacement Pages of Planning Statement



**Section 16 Application No. A/NE-TKLN/102**

**Annex 1 - Response to Comments Table**

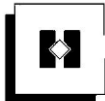
No.	Comments Received	Our Responses
<b>1.</b>	<b><i>Comments from Drainage Services Department received on 25 July 2025</i></b>	
a	1. I have the following comments on the FI: <u>Drawing no. D01 refers.</u> The applicant should review if an u-channel along the northern boundary of lot 62 should be provided to intercept the overland flow from adjacent land.	The U-channel is provided along the northern boundary of Lot 62.
b	The applicant should update the legend for CP7.	It has been revised accordingly.
c	It was indicated that water will fall from +15.2mPD to +15.25mPD at the northern boundary of lot 65 S.B RP. The applicant should review.	It has been revised accordingly.
d	It is not feasible to construct a 450UC with CL=+15.25mPD and IL=+14.90mPD. The applicant should review and check if similar issues occur at other locations.	Noted. Invert level has been reviewed and revised accordingly in <b>Annex 5</b> .
e	The applicant should clarify if the diameter of the proposed pipe at the outlet is 675mm or 750mm, and update the drawing accordingly.	The diameter shall be 750mm. It has been revised accordingly.
f	<u>Drawing no. D02 refers.</u> The sections provided in this drawing do not match with the plan. The applicant should review.	The sections have been reviewed and revised accordingly in <b>Annex 5</b> .
g	Section B-B: The applicant should clarify if lot 62 forms part of the site.	Yes, Lot 62 is part of the Site in this application, the drainage proposal has been revised accordingly.
h	Unless the applicant could submit a revised drainage proposal to my satisfaction, I do not support the application from drainage perspective.	Noted with thanks.
<b>2.</b>	<b><i>Comments from Transport Department received on 28 July 2025</i></b>	
i	Please find below our major comments on the subject application:	It is believed that the required journey time delay analysis study is unnecessary to be done because of three reasons:



	<p>The applicant shall justify and demonstrate the use of 600 veh/hr is adequate for the design flow capacity of Lin Ma Hang Road, including a journey time delay analysis study should be conducted to demonstrate the journey time in connection with different v/c ratios.</p>	<ol style="list-style-type: none"><li>1. It is important to recognise that the current high traffic flow and parking demand in the area are not attributable to the Applicant but stem directly from the operations of the nearby Heung Yuen Wai Boundary Control Point. This control point generates a substantial volume of vehicular traffic, including cross-border commuters, tourists and commercial vehicles, which overwhelms the existing road infrastructure. In reality, even in the absence of the proposed development, the potential congestion issues would escalate, as the checkpoint's traffic continues unabated. Introducing the temporary vehicle park would, in fact, serve as a mitigating factor by providing organized parking options that divert vehicles off the roads, thereby reducing on-street queuing and haphazard parking that exacerbates delays. Requiring a journey time delay analysis under these circumstances would overlook the exogenous nature of the problem, focusing instead on a symptom rather than the underlying cause, and could delay the implementation of a much-needed facility.</li><li>2. The current operator, known as Skye Parking Limited, brings over two decades of specialised experience in managing open and covered vehicle parks, establishing itself as one of Hong Kong's premier providers of integrated parking solutions. This extensive history includes the existing public vehicle park operated at the Heung Yuen Wai Boundary Control Point as well as the vehicle parks at the Application Site which have gained support from various government departments, including Ta Kwu Ling Police Office and the Transport Department, as well as positive feedback from local residents, tourists and rural committees of Ta Kwu Ling North District (see <b>Annexes 6 and 7</b>). These existing and proposed temporary vehicle parks, supported by letters from local residents and rural committees, have demonstrated how they alleviated traffic congestion by offering reliable parking alternatives, which in turn satisfy the acute demand in the vicinity and prevent spillover effects such as illegal roadside parking since their operation in 2023. Historically, no such journey time delay analysis has</li></ol>
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		<p>been required by relevant departments for prior approvals. The unnecessary analysis would impose undue time and financial burdens on the Applicant, yielding no substantive benefits given the proposed development's established positive impact. Moreover, any complaints about traffic congestion in the area are not linked to the Applicant's operations but, as previously mentioned, arise from the lack of parking space in the Boundary Control Point, driving desire of the travelers and the inadequate public transport capacity. Ultimately, the proposed vehicle park is not just beneficial but essential for assisting the government in fulfilling community demands, promoting smoother cross-boundary movements and enhancing overall public convenience—outcomes that align with broader urban planning goals and the positioning of the site as part of the boundary commerce and industry zone as outlined in the Northern Metropolis Action Agenda 2023.</p> <p>3. The Applicant fully acknowledges the potential for traffic congestion at the site and has proactively implemented traffic management measures to mitigate any adverse effects. For example, when the existing vehicle parks reach the capacity, clear signage is displayed to inform drivers and trained security guards are stationed to direct traffic and advise users to seek alternatives, thereby preventing unnecessary queuing or backups on the concerned roads. These measures have been refined over years of operation at the existing vehicle parks, resulting in a commendable track record: no formal complaints related to traffic congestion have been received from the community. This success demonstrates the Applicant's commitment to responsible stewardship and operational efficiency, ensuring that the facility integrates seamlessly into the local traffic ecosystem without contributing to delays.</p>
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		Hence, requiring a journey time delay analysis would be redundant, as empirical evidence from ongoing operations already confirms the effectiveness of these controls in maintaining flow and safety.
j	b) The applicant shall justify the adoption of a growth rate of 14.3% (the growth rate of projected population over 3 years) is appropriate for traffic flow calculation.	The adoption of a growth rate has been revised in <b>Annex 4</b> based on the population and employment data obtained from 2021-based Territorial Population and Employment Data Matrices (TPEDM) planning data in North District published by Planning Department. An annual growth factor of 1.81% from 2025 to 2028 is adopted.
k	c) Our previous comment on "the applicant shall advise the management / control measures to be implemented to ensure no queueing of vehicles outside the subject site" has not been addressed. The applicant shall further supplement and propose additional measures to prevent queueing of traffic e.g. provision of parking information to the public.	As adopted in the existing practice, when the proposed public vehicle park is fully occupied, the staff will erect a "Full" sign at the entrance to notify and direct drivers to other nearby parking lots, and the staff will be stationed entrance to assist the drivers, ensuring there will be no queueing of vehicles outside the proposed development.
l	We might offer further comments after received the above requested information.	Noted.
<b>3. Comments from Lands Department received on 30 July 2025</b>		
m	Site inspection conducted by staff of this office on 14.7.2025 revealed that there were a total of 5 structures erected on the application site. The Built-over Area (BOA) of the 1 existing structures erected on Lot No. 61 SB RP in DD. 80 has exceeded the BOA permitted under the Short Term Waiver No. 1666. The size and height of the remaining 2 existing structures erected on Lot No. 65 SB RP in DD. 80 do not tally with the proposal under the subject planning application (i.e. the indicative layout plan at Annex I of the Supporting Planning Statement).	<p>Noted.</p> <p>Previously submitted planning application has been revised to reflect the actual condition of the Application Site. Upon planning approval, the Applicant will apply for a new Short Term Waiver for the concerned structure on Lot No. 61 SB RP in DD. 80 to ensure everything is tally with the permitted BOA.</p> <p>The size and height of the remaining two existing structures erected on Lot No. 65 SB RP in DD. 80 are also reflected in the revised layout plan in <b>Annex 1</b>, and revised planning statement.</p>
n	LandsD's previous comment sent to you on 17.7.2025 remain valid.	Noted with thanks.