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Timothy Wai Pui WU/PLAND

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收件者: tpbpd/PLAND
副本: Timothy Wai Pui WU/PLAND; '[REDACTED]'
主旨: (A/NE-TKLN/108) - Response to Departmental Comments
附件: TPB_L02 RtoC.pdf; 20251011 Consolidated_RTC.pdf; Appandix 1 -SWEPT PATH.pdf;
Appendix 2-crane lorries photo.pdf; SKETCH.pdf

類別: Internet Email

Dear Sir/Madam,

In response to the comments suggested by the Civil Engineering and Development Department dated 30.9.2025, the Transport Department dated 3.10.2025, the Planning Department and the Drainage Services Department dated 6.10.2025, we would like to submit herewith our responses for your consideration.

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

Best Regards,

Lo Ming Kong
Top Bright Consultants Ltd.
Tel: [REDACTED]
Fax: [REDACTED]



才鴻顧問有限公司
TOP BRIGHT CONSULTANTS LIMITED

Your Ref.: A/NE-TKLN/108

Our Ref.: 25/864/L02

October 13, 2025

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

By Email

Dear Sir/Madam,

**Temporary Vehicle Park for Crane Lorries and Associated Filling of Land for
a Period of 3 Years in “Agriculture” Zone, Lots 768 and 769 in DD78,
Ta Kwu Ling, New Territories
(Application No.: A/NE-TKLN/108)**

In response to the comments suggested by the Civil Engineering and Development Department dated 30.9.2025, the Transport Department dated 3.10.2025, the Planning Department and the Drainage Services Department dated 6.10.2025, we would like to submit herewith our responses for your consideration.

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

Yours faithfully,
For and on behalf of
Top Bright Consultants Ltd.

Lo Ming Kong

Encl.

c.c. Welltune Transportation Limited (the Applicant)

[REDACTED]

Responses to Departmental Comments

Departmental Comments		Responses
A.	GEO, Civil Engineering and Development Department [Email dated 30.9.2025]	
1.	The north eastern part of the application site is overlooked by steep natural hillside and meets the Alert Criteria for a Natural Terrain Hazard Study (NTHS). However, we note in Figure 5 (Layout Plan) in the supplementary planning statement of the Applicant's submission that no specific use is annotated in the aforementioned area (i.e. hatched red area as shown in attached Annex 1). Given that the subject application would not include any critical facilities (i.e. Group 1 to Group 3 facilities in Table 2.2 of the attached Annex II , in particular open car park) in the aforementioned area, an NTHS is considered not necessary and we have no adverse comment on the subject application	Noted. There is no specific use and no structure will be erected in the mentioned area (i.e. north eastern part of the Application Site).
B.	Transport Department [Email dated 3.10.2025]	
1.	The applicant shall demonstrate the satisfactory maneuvering of the crane lorries entering and exiting the subject site, maneuvering within the subject site and into/out of the parking spaces, preferably using the swept path analysis.	To demonstrate the satisfactory maneuvering of the crane lorries entering and exiting the Application Site, maneuvering within the Application Site and into/out of the parking spaces, a swept path analysis is attached in Appendix 1 .
2.	The applicant shall advise the provision of pedestrian facilities and management measures to ensure pedestrian safety; and	To ensure pedestrian safety, restricted sign of maximum speed 5 km/h and warning sign of 'be aware of pedestrian' (in Chinese) will be provided at the ingress/egress of the Application Site.
3.	The proposed vehicular access between Lin Chuk Road and the application site is not managed by TD. The applicant should seek comments from the responsible party.	Noted.

Departmental Comments		Responses
C.	Planning Department [Email dated 6.10.2025] (Contact Person: Mr. WU Wai Pui, Timothy Tel: 2158 6031)	
1.	According to paragraph 1.01 of the submitted planning statement, it is noted that the applicant currently owns a fleet of 22 crane lorries. All of them were accommodated in Kwu Tung North. However, due to the government project, 6 will be accommodated under the captioned planning application. Please advise where the rest of them are to be accommodated.	The Applicant owns a fleet of 22 crane lorries in Hong Kong, and these lorries are stationed in different locations in the Territories to meet the operational needs. The number of parking spaces for crane lorries in the Application Site is similar to the resumed site in Kwu Tung North.
2.	According to paragraph 6.06 of the submitted planning statement, it is mentioned that ‘relevant mitigation measures will be implemented to minimise potential environmental impact’. Please supplement the details.	The following measures will be adopted to avoid potential adverse environmental impact: (a) The surface of the Site will be hard-paved to minimize dust emissions. (b) The traffic generated by the Site will be minimal, and no adverse residual air quality impact is envisaged. (c) Perimeter fencing will be provided where appropriate. (d) Peripheral drainage channels with catch pits will be provided. (e) A hump across the ingress/egress to reduce the speed of crane lorries. (f) No workshop, vehicle dismantling, repair or painting activities will be carried out on the premises. (g) No night-time operation between 18:00 and 08:00.
3.	It is noted that the application involves filling of land for the entire site with a depth of about 1m. Please advise what materials will be used for filling of land.	The Application Site will be filled with soil with concrete on top. The fill materials shall comply with clause 6.09 in the General Specification for Civil Engineering Works (2020 Edition), HKSAR.

Departmental Comments		Responses
4.	According to the submission, it is noted that 6 crane lorries owned by the applicant will be accommodated at the application site. Please clarify if the crane lorries are under 24 tonnes (paragraph 5.02 of the submitted planning statement refers) or not exceeding 24 tonnes (paragraph 5.04 of the submitted planning statement refers). Also, please provide some photos of those 6 crane lorries.	The 6 crane lorries to be accommodated at the Application Site are under 24 tonnes. A set of crane lorry photos is attached for reference (see Appendix 2).
5.	It is noted that 2 parking spaces for private cars are proposed at the application site. Please clarify if their purposes and whether the parking spaces will be used by the applicant only.	The private car parking spaces at the Application Site will be used by the staff/visitors of the Applicant only.
D. Drainage Services Department [Email dated 6.10.2025]		
1.	No objection to the application.	Noted with thanks.
2.	The submitted drainage proposal has not been prepared to my satisfaction. Hence, should the application be approved, a condition should be included to request the applicant to submit and implement a revised drainage proposal for the site to ensure that it will not cause adverse drainage impact to the adjacent areas. The drainage facilities should be properly maintained at all times during the planning approval period and rectified if they are found inadequate /ineffective during operation.	Noted. The applicant agrees to accept the relevant approval conditions on the submission of a revised drainage proposal should the application be approved.
3.	The applicant should construct and maintain the proposed drainage facilities whether within or outside the site at his own expense.	Noted and agreed.

Departmental Comments	Responses
4. The site is in an area where public sewerage connection is not available. Environmental Protection Department (EPD) should be consulted regarding the sewage impact assessment and sewage treatment/disposal facilities for the proposed development.	Noted. The proposed development does not have any sewage generating facilities such as toilet, kitchen, etc. Therefore, no sewage discharge is anticipated.
5. Comments on the drainage proposal are as follows:	
- The applicant should be advised that the limited desk-top checking by Government on the drainage proposal covers only the fundamental aspects of the drainage design which will by no means relieve his obligations to ensure that (i) the proposed drainage works will not cause any adverse drainage or environmental impacts in the vicinity; and (ii) the proposed drainage works and the downstream drainage systems have the adequate capacity and are in good conditions to accommodate all discharge water collected from his lot and all upstream catchments. The applicant shall effect any subsequent upgrading of these proposed works and the downstream drainage systems whenever necessary.	Noted and agreed.
- The cover levels of proposed u-channels and catch pits should be flush with the adjoining ground level.	Noted and will follow.
- The applicant should check and ensure that the existing drainage system to which the proposed connection will be made have adequate capacity and satisfactory condition to cater for the additional discharge from the captioned lot. He should also ensure that the flow from this site will not overload the existing drainage system.	Noted and agreed.

Departmental Comments	Responses
- The existing discharge location to which the applicant proposed to discharge the stormwater from the subject site is not maintained by DSD. The applicant should identify the owner of the existing discharge location to which the proposed connection will be made and obtain agreement from the owner prior to commencement of the proposed works. -	Noted and will follow.
- The applicant is reminded that all existing flow paths as well as the run-off falling onto and passing through the site should be intercepted and disposed of via proper discharge points. The applicant shall also ensure that no works, including any site formation works, shall be carried out as may adversely interfere with the free flow condition of the existing drain, channels and watercourses on or in the vicinity of the subject site any time during or after the works.	Noted and will follow.
- The proposed drainage works, whether within or outside the lot boundary, should be constructed and maintained by the applicant at his own expense.	Noted and agreed.
- For works to be undertaken outside the lot boundary, the applicant should obtain prior agreement from District Lands Officer/North, Lands Department and/or relevant private lot owners.	Noted and will follow.
- The applicant should make good all the adjacent affected areas upon the completion of the drainage works.	Noted and will follow.

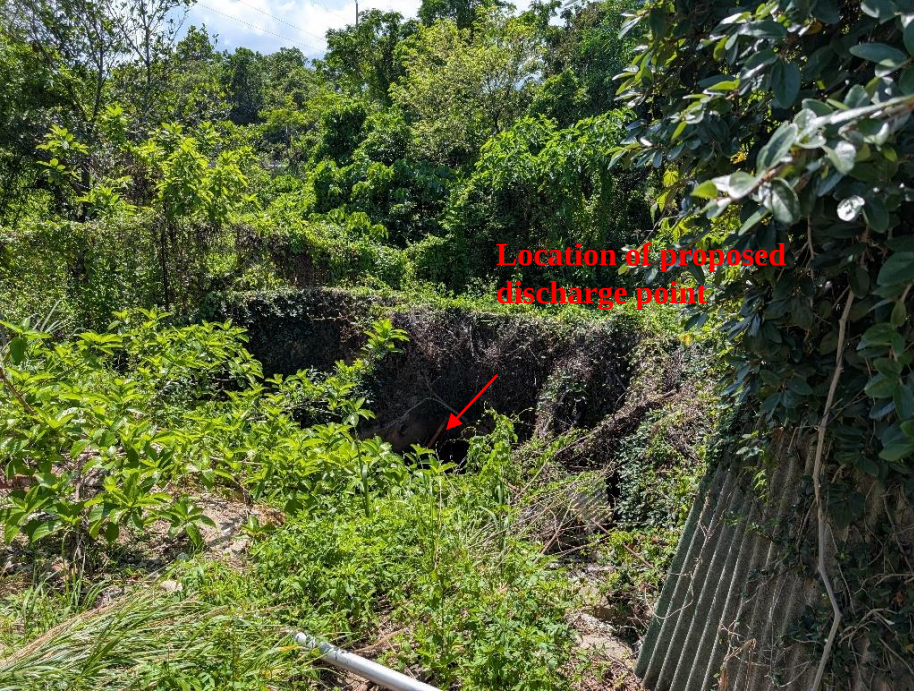
Departmental Comments	Responses
- The applicant should construct and maintain the proposed drainage works properly and rectify the system if it is found to be inadequate or ineffective during operation.	Noted and agreed.
- As usual, Government should be empowered to inspect conditions of the private drainage system and to enforce its cleansing by the owners, if necessity arises (e.g. upon receipt of complaints).	Noted and agreed.
- The existing drainage facilities, watercourse, river, channel and the like should not be affected and obstructed by the construction materials, waste or debris from the proposed development.	Noted and will follow.

Departmental Comments	Responses
- There is no formal record of the so-called “existing watercourse” to which the proposed drainage system to be connected. The applicant is required to provide evidence to demonstrate its presence (e.g. photos with a plan showing the locations of the camera and directions of all photos taken) and details of the watercourse (e.g. dimensions).	The existing watercourse is shown in the following aerial photo extracted from Open3Dhk of the Lands Department.  The image is a screenshot of the Open3Dhk web application. It displays an aerial view of a rural area with green fields and some buildings. Two features are highlighted with red arrows and labels: 'Existing Nullah' (a small stream or ditch) and 'Existing Watercourse' (a larger, more defined channel). The interface includes a search bar at the top left and navigation controls at the bottom right.



Photo of the existing nullah

More photos of the existing watercourse can be presented in a revised drainage proposal if so required.

Departmental Comments	Responses
- The applicant should supplement details for the connection between the existing watercourse and the proposed u-channel. Invert levels of the existing watercourse and the proposed u-channel at the connection point should be indicated.	The level of the subject site is obviously higher than that of the existing watercourse.  Please refer to the attached 'SKETCH' for details for the connection between the existing watercourse and the proposed u-channel.

Departmental Comments		Responses
	- The applicant should consider the thickness of concrete cover/grating when determining the invert levels of catch pits and u-channels to ensure the depths of u-channels are adequate.	Noted and will follow.