

Date : 6th August, 2026
Our Ref. : ADCL/PLG-10352/L002

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

By Email

Dear Sir/Madam,

**Re: 16 Planning Application for Proposed Temporary Warehouse (Excluding Dangerous Goods Godown) with Ancillary Facilities for a Period of 3 Years at Lots 1309 S.B ss.3 and 1313 RP in D.D. 78 and adjoining Government Land, Ta Kwu Ling North, New Territories
(Planning Application No. A/NE-TKLN/136)**

We refer to our submission and the comments received from the relevant departments regarding the subject application. We would like to provide a Response to Comment Table and Swept Path Analysis to facilitate considerations by relevant departments and the Town Planning Board.

Thank you for your kind attention and should you have any queries, please do not hesitate to contact the undersigned at [REDACTED]

Yours faithfully,
For and on behalf of
Man Chi Consultants and Construction Limited



Edward Lit
Planning Consultant

Encl.

Department	Date	Comments	Responses to Departmental Comments
Development Bureau and Planning Department	9.7.2026	1. details of the affected businesses, including their names, nature of operation, site photos showing the tenants' affected operations, electricity bills and payment record of some tenants, together with information demonstrating that they are existing operator etc.;	The applicant, Lok Sheng Engineering Company Limited, is an operator whose existing operation is affected by the Hung Shui Kiu and Ha Tsuen New Development Area (HSK/HT NDA) Stage 2 development. The affected operation involves a warehouse for construction materials with ancillary facilities at Lot Nos. 986 RP (Part), 991 RP, and 995 in D.D. 124, occupying an area of about 300m ² . Please refer to the appendices for the relevant payment records and site photos.
		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;	The applicant, being the affected operator, submits the current application to seek planning permission for relocating its affected business operations to the application site.
		3. according to the submission, the existing business operation occupies about 300 sq. m., whereas the proposed application site is about 460 sq. m. Please provide a detailed justification to support the necessity of this larger area for the relocation;	The application site is subject to a previous planning approval with a similar scale, making it highly compatible without requiring substantial changes to the site configuration. While the existing operation occupies about 300m², the proposed site (with an area of about 460m²) is considered optimal and proportionate to accommodate crucial operational and safety upgrades. The existing operator would like to take this opportunity to upgrade and expand its scale at the application site in view of the growing business demand driven by infrastructural development in the region. The proposed upgrade will

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			provide a safer, more spacious working environment, enhancing the capacity to deliver essential services, to meet the needs of the expanding industrial sectors. The application site would be equipped with sufficient FSI provisions and ancillary facilities, meeting operational and relevant requirements. The application site, approximately 460m ² , is considered proportionate to support this enhanced scale compared to the current site, ensuring operational continuity with minimal disruption.
		4. according to para.5.1.1 of the submitted Planning Statement, it is noted that a site search was conducted. Please provide details of the site search, including the location of alternative site(s) and reasons for not choosing.	An extensive site search was conducted to identify a suitable alternative location (Please refer to the table below). Potential sites were evaluated based on their site size, compatibility, immediate availability, and cost-effectiveness. Compared to the rejected options, the application site is of a highly comparable and proportionate scale. It is already flat and paved and can be utilized immediately without substantial changes to the site configuration. The application site is uniquely positioned to meet the applicant's urgent need for immediate relocation caused by the government development clearance.

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30.7.2026	Planning Department	1. According to our site visit, it is noted that part of the application site has been covered by a structure for warehouse use while the rest of the application site is mostly for open storage use. Please clarify. 2. Please advise if the application site will be fenced-off. If affirmative, please advise the height of the fencing. 3. According to the submitted Planning Statement, it is noted that applicant is affected by the development of HSK/HT NDA. Please advise if the applicant has vacated the affected site. If affirmative, please also advise the date.	It is clarified that the application site will be fully developed and operated strictly in accordance with the proposed use. All existing open storage activities will cease immediately, and no open storage use will take place on the application site upon receiving planning approval. The application site will be fenced off by a 2m metal fenced boundary fencing. The applicant's business operations were directly affected by the Hung Shui Kiu / Ha Tsuen New Development Area (HSK/HT NDA) project, and the original premises were vacated in July 2023. Following the clearance, the applicant temporarily consolidated part of its business operations into another existing site in Yuen Long as a short-term contingency. However, that facility is severely space-constrained and unable to sustain two distinct operational streams simultaneously, resulting in severe spatial friction and operational bottlenecks. To resolve these constraints and ensure business continuity, the subject application site was identified as the optimal long-term relocation solution due to its suitable location, site area, and financial viability. Relocating the affected operations to the application site

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		4. According to our site visit, there is a two-storey structure within the application site while only single- storey structures are proposed in the application. Please clarify.	will allow the applicant to restore smooth, efficient, and viable business operations. The existing two-storey structure was erected by the previous occupant. Upon approval of the subject application, the applicant will reconfigure the site in strictly according with the proposed layout plan and demolish any unauthorized or unnecessary structures.
30.7.2026	Lands Department	1. he objects to the application; 2. the Site comprises Old Schedule Agricultural Lots 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. The proposed ingress/egress of the Site is required to pass through GL but no right of access via GL is granted to the Site; 3. the following irregularities covered by the planning application have been detected by his office: <u>unauthorised structure(s) within the said private lot(s) covered by the planning application</u> there are unauthorised structures on the private lots	Noted. The applicant is committed to removing unauthorized structures and will apply to the Lands Department for a Short-Term Waiver and Short-Term Tenancy to permit the structure(s) erected within the private lots and the occupation of Government land within the application site boundary upon approval of the current application. Ditto.

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		concerned. The lot owner/applicant should immediately rectify the lease breaches and his office reserves the rights to take necessary lease enforcement action against the breaches without further notice; <u>unlawful occupation of GL adjoining the said private lots with unauthorised structures covered by the planning application</u> the GL within the Site (about 111m² as mentioned in the Application Form) has been fenced-off/illegally occupied with unauthorised structure(s) without any permission. LandsD objects to the planning application since there is illegal occupation of GL which regularisation would not be considered according to the prevailing land policy. The lot owner should immediately cease illegal occupation of GL as demanded by LandsD. His office reserves the rights to take necessary land control action against the illegal occupation of GL without further notice; 4. subject to the approval of the Board to the planning application which shall have reflected the rectification aforesaid required, the lot owner shall apply to his office for Short Term Waiver (STW) to permit the structures erected/proposed to be	Ditto. Ditto.

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		erected. The application for STW will be considered by the Government in its capacity as a landlord and there is no guarantee that it will be approved. The STW, if approved, will be on whole lot basis and subject to such terms and conditions including the payment of back-dated waiver fees and administrative fee as considered appropriate to be imposed by LandsD. In addition, LandsD reserves the right to take enforcement action against the lot owner/applicant for any breaches of the lease conditions, including the breach(es) already in existence or to be detected at any point of time in future and land control action for any unlawful occupation of GL. Besides, given the applied use is temporary in nature, only erection of temporary structures will be considered; and 5. unless and until the unauthorised structures and the unlawful occupation of GL are duly rectified by the lot owner/applicant, his office's objection to the application must be brought to the attention of the Board when they consider the application	

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Transport Department	3.8.2026	1. The applicant shall demonstrate the satisfactory maneuvering of the goods vehicles entering and exiting the subject site to and from Lin Ma Hang Road, maneuvering within the subject site and into/out of the loading/unloading space, preferably using the swept path analysis;	Swept path analysis is conducted. Figure SP-01 and Figure SP-02 , demonstrate that there is sufficient space for maneuvering of the goods vehicles entering and exiting the subject site to and from Lin Ma Hang Road, maneuvering within the subject site and into/out of the loading/unloading space.
		2. The applicant shall advise the measures for preventing illegal parking of visitors' vehicles outside the application site; and	To prevent illegal parking of visitors' vehicles outside the application site, the applicant will implement strict traffic and site management measures. Specifically, all visitors will be required to make a pre-booking or prior arrangement before entering the site. Furthermore, dedicated staff will be deployed on-site to actively manage traffic flow and direct pre-booked vehicles to designated parking area within the application site, ensuring no visitor vehicles park illegally on nearby public road outside the application site.
		3. The local access road between Lin Ma Hang Road and the application site is not managed by TD. The applicant should seek comments/approvals from the responsible party for the vehicular access road.	Noted.

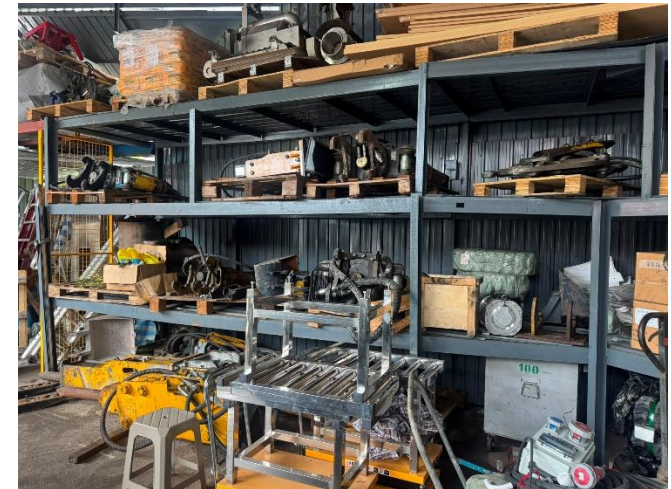
Site Search Exercise for Relocation

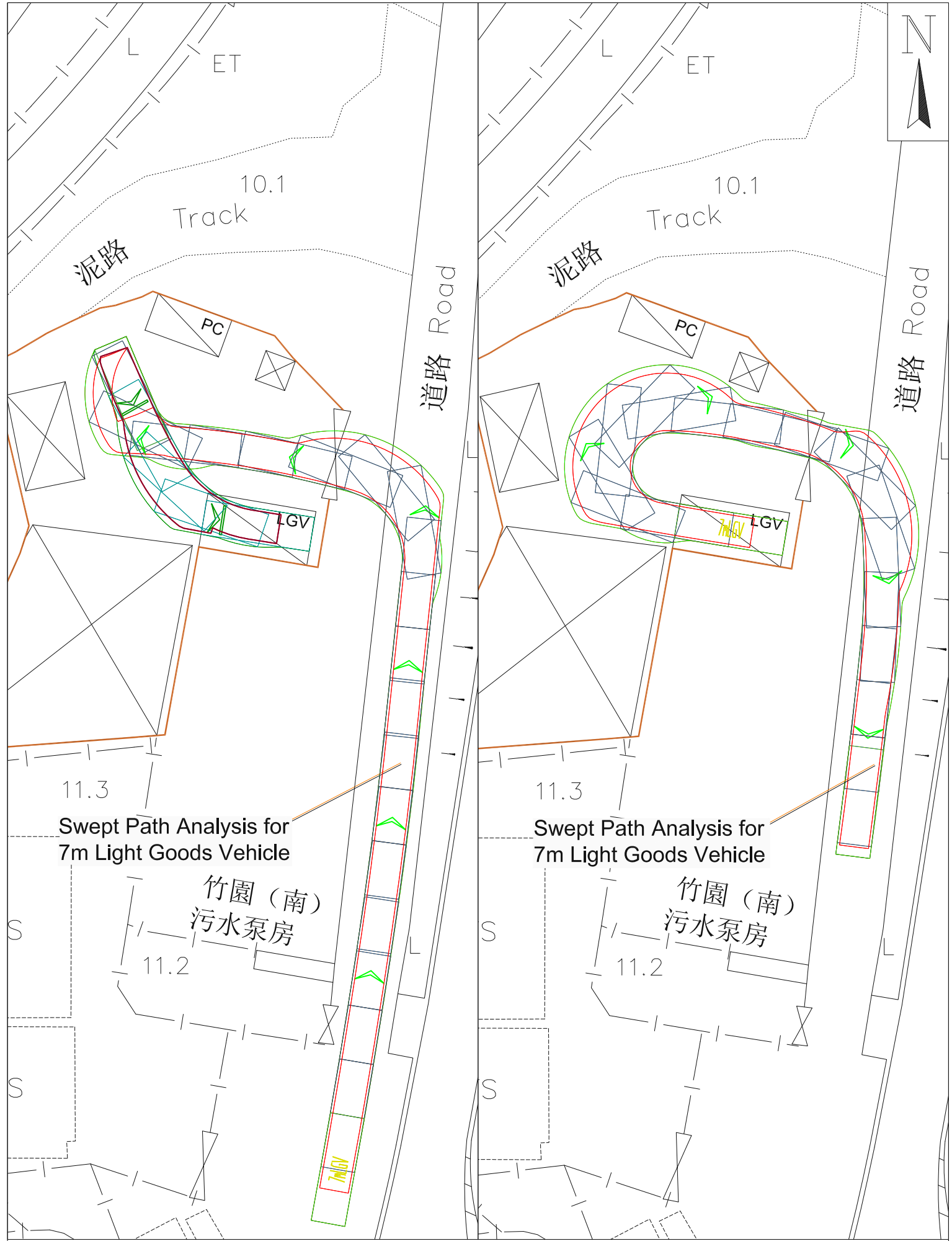
Site	Possible Site Location	Size (m ²) About	Zoning	Reasons for Unsuitable for Relocation
1	Lot 1756 in D.D.78, Ta Kwu Ling, New Territories	1,510m ²	"AGR on the Approved Ta Kwu Ling North Outline Zoning Plan No. S/NE-TKLN/2	The site is substantially larger than the original affected operations; Tree felling is required; Not compatible with the surrounding area.
2	Lots 172 and 174 RP (Part) in D.D. 84, Ping Che, Ta Kwu Ling, New Territories	820m ²	"AGR on the approved Ping Che and Ta Kwu Ling Outline Zoning Plan No. S/NE-TKL/14	Landowner withdrew site from market before commitment; The site is substantially larger than the original affected operations.
3	Lot 337 in D.D. 37	220 m ²	"AGR on Approved Fu Tei Au And Sha Ling Outline Zoning Plan No. S/NE-FTA/18	The site is smaller than the original affected operations.
4	Lot Nos. 4029 and 4030 in D.D. 104, Wing Kei Tsuen, Yuen Long	1,480 m ²	Other Specified Uses (Comprehensive Development To Include Wetland Restoration Area) on the approved Nam Sang Wai Outline Zoning Plan No. S/YL-NSW/12	The site falls within the Wetland Buffer Area under Town Planning Board Guidelines for Application for Development within Deep Bay Area under Section 16 of the Town Planning Ordinance (TPB PG-No. 12C; The site is substantially larger than the original affected operations; Not compatible with the surrounding area.
5	Lot Nos. 1942 S.A RP, 1942 S.B RP in D.D. 118, Shap Pat Heung, Yuen Long	2,630 m ²	"AGR" on the Approved Tai Tong Outline Zoning Plan No. S/YL-TT/20	The site is substantially larger than the original affected operations; Tenancy for portion of the site is not feasible.

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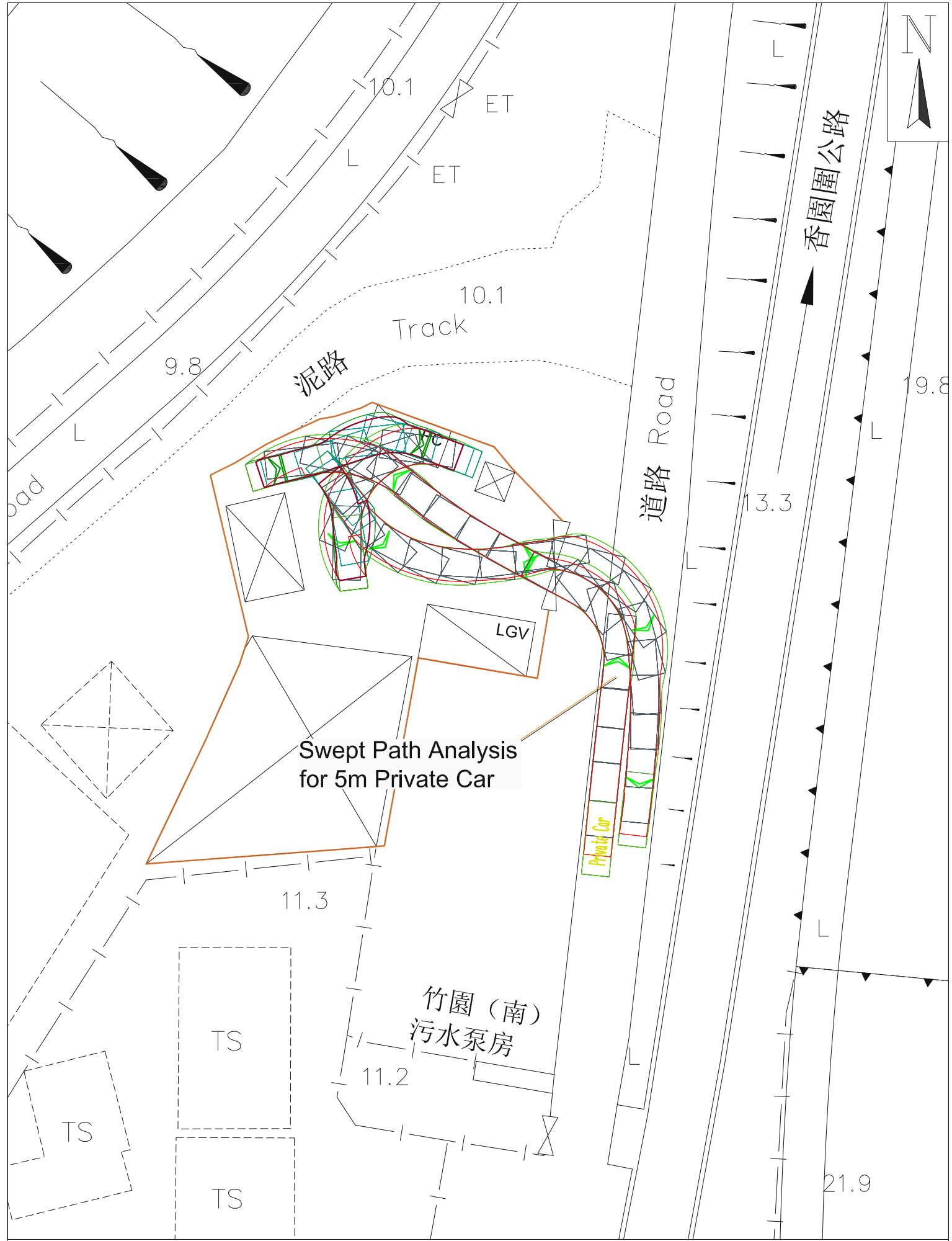
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Site Photos of Existing Operations





Swept Path Analysis for 7m Light Goods Vehicle



Swept Path Analysis for 5m Private Car

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Figure SP-02

Scale : 1:300 @ A3

Drawing Date: Aug 2026

