

Our Ref.: DD 130 Lot 2336
Your Ref.: TPB/A/TM-LTYT/483

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

By Email

09 April 2025

Dear Sir,

1st Further Information

Proposed Temporary Heavy Goods Vehicle Park, Open Storage of Construction Materials and Machinery with Ancillary Facilities for a Period of 3 Years in “Village Type Development” Zone, Lot 2336 (Part) in D.D. 130, Nai Wai, Tuen Mun, New Territories

(S.16 Planning Application No. A/TM-LTYT/483)

We write to submit further information (FI) to supersede the previous FI submission dated 8.4.2025 in response to departmental comments of the subject application.

Should you require more information regarding the application, please contact our Mr. Danny NG at [REDACTED] or the undersigned at your convenience. Thank you for your kind attention.

Yours faithfully,

For and on behalf of
R-riches Property Consultants Limited



Christian CHIM
Town Planner

cc DPO/TMYLW, Pland

(Attn.: Mr. Steven MA
(Attn.: Ms. Sharon WAN

email: sksma@pland.gov.hk)
email: sttwan@pland.gov.hk)



Responses-to-Comments

Proposed Temporary Heavy Goods Vehicle Park, Open Storage of Construction Materials and Machinery with Ancillary Facilities for a Period of 3 Years in “Village Type Development” Zone, Lot 2336 (Part) in D.D. 130, Nai Wai, Tuen Mun, New Territories

(Application No. A/TM-LTTY/483)

(i) A RtoC Table:

Departmental Comments		Applicant's Responses
1. Comments of the Chief Engineer/Mainland North, Drainage Services Department (CE/MN, DSD)		
(a)	Should the application be approved, a condition should be included to request the applicant to submit and implement a drainage proposal for the site to ensure that it will not cause adverse drainage impact to the adjacent area. The drainage system should be properly maintained at all times during the planning approval period and rectify if they are found inadequate/ineffective during operation.	The applicant will make submission for a drainage proposal for the consideration of CE/MN, DSD upon obtaining relevant planning permission from the Town Planning Board (the Board). Subject to acceptance by the Drainage Authority, relevant drainage facilities will be provided at the application site (the Site) in accordance with the accepted proposal.
(b)	Please be advised that no public stormwater and sewer manhole and pipes in the vicinity of subject site. The applicant should construct and maintain the proposed drainage works whether within or outside the lot boundary by lot owner at their own expense.	Noted.
(c)	The site is planned to construct a temporary Heavy Goods Vehicle Park, Open Storage of Construction Materials and Machinery with Ancillary Facilities and washroom and it is in an area where public sewerage connection is not available. EPD should be consulted regarding the sewage impact assessment and sewage treatment/disposal facilities for the proposed development.	

Departmental Comments		Applicant's Responses
2. Comments of the Commissioner for Transport (C for T)		
(a)	It is noted that the vehicles entering the proposed site will route through the unallocated and unleased government land adjacent to the footpath of Shun Tat Street and an existing container yard at 76 Shun Tat Street consisting of various private lots. As these are not public roads or footpaths managed by this Office, any right-of-way of the proposed site is not guaranteed. The applicant is required to seek comments from the lot owners and relevant stakeholders for granting permission to access to the proposed site. Comments from relevant government departments should also be sought.	The applicant has obtained consent from the operator of the existing container yard for accessing the Site to/from Shun Tat Street.
(b)	Please clarify if the same vehicle run-in/ run-out at Shun Tat Street of the existing container yard mentioned in (a) above will be used, and any modification of existing or additional vehicular run-in/run-out at the public footpath will be required for assessing the proposed site. If affirmative, it should be designed and constructed by the applicant in compliance with HyD's standard and to the satisfaction of HyD.	The same vehicle run-in/out of the existing container yard at Shun Tat Street will be used by the proposed development. If required, the applicant will liaise with the operator of the container yard for modification of the existing run-in/out according to the standard of HyD and to the satisfaction of HyD.
(c)	Sufficient vehicle manoeuvring space should be reserved within the proposed site. Please ensure that no queuing and/or waiting of motor vehicles from the proposed site onto the local access and Shun Tat Street would occur and no motor vehicles shall be permitted to reverse into and out of the site onto the local access road and Shun Tat Street.	<p>The swept path analyses illustrated in Plans 12 and 13 of the original submission have shown that there is sufficient vehicle manoeuvring space within the Site.</p> <p>It is confirmed that no queuing and/or waiting of vehicles from the Site onto the local access and Shun Tat Street would occur. No vehicles will be allowed to reverse into and out of the Site onto the local access road and Shun Tat Street.</p>

Departmental Comments		Applicant's Responses
3. Comments of the Director of Environmental Protection (DEP)		
(a)	We have previously written to PlanD regarding the revised <i>"Code of Practice on Handling the Environmental Aspects of Temporary Uses and Open Storage Sites"</i> (the COP). By making reference to the information in the planning application document, the proposed development will generate traffic of heavy vehicles; and the subject heavy vehicle traffic is expected to travel along any access road within 50 m from the nearest residential buildings. We could not lend our support to the subject application from environmental planning perspective.	<p>Noted. The applicant will strictly follow the <i>'Code of Practice on Handling the Environmental Aspects of Temporary Uses and Open Storage Sites'</i> to minimise adverse environmental impacts and nuisance to the surrounding areas.</p> <p>Mitigation measures, including no movement of vehicles nor delivery operations during early morning or nighttime hours, and erection of 2.5 m high solid metal fencing along the site boundary, will be adopted to minimise the potential noise nuisance to the surrounding area.</p>
4. Comments of the Chief Town Planner/Urban Design & Landscape, Planning Department (CTP/UD&L, PlanD)		
(a)	Noting "a 2 m landscape buffer along the western and northern periphery of the Site is proposed" as shown in Para. 5.13 and the 'Layout Plan' (Dwg no. PLAN10), but no specified information of proposed planting and mitigation measures are included.	<p>The applicant proposes to plant 34 nos. of tree along the landscape buffer to reduce the potential adverse visual impact to the surrounding area.</p> <p>Please refer to the enclosed landscape plan at Annex 1.</p>
5. Comments of the District Lands Officer/Yuen Long, Lands Department (DLO/YL, LandsD)		
(a)	The application site ("the Site") comprises an Old Schedule Agricultural Lot No. 2336 in D.D.130 ("the Lot") 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.	Noted. Upon obtaining planning permission from the Board, the applicant will submit an application for Short Term Waiver (STW) to DLO/YL, LandsD for the erection of the proposed structures at the Site.
(b)	<p><u>Unauthorized structure(s) within the Site not covered by the planning application</u></p> <p>There are authorized structures within the Site including car porches and a dog house not covered by the subject planning application. Our on-site measurement revealed that the number of structures, built-</p>	According to the applicant, the Site only occupies a portion of <i>Lot No. 2336 in D.D. 130</i> , where no structures have been erected thereon within the site boundary of the current planning application (Plan 3 of the original submission refers). Please also note that the proposed 2 nos. of structure with gross floor area (GFA) of 27 m ² and height of 3 m under

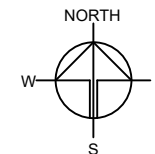
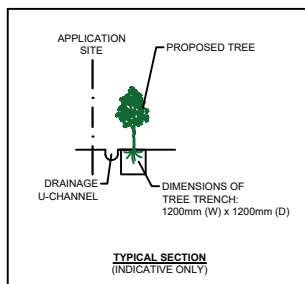
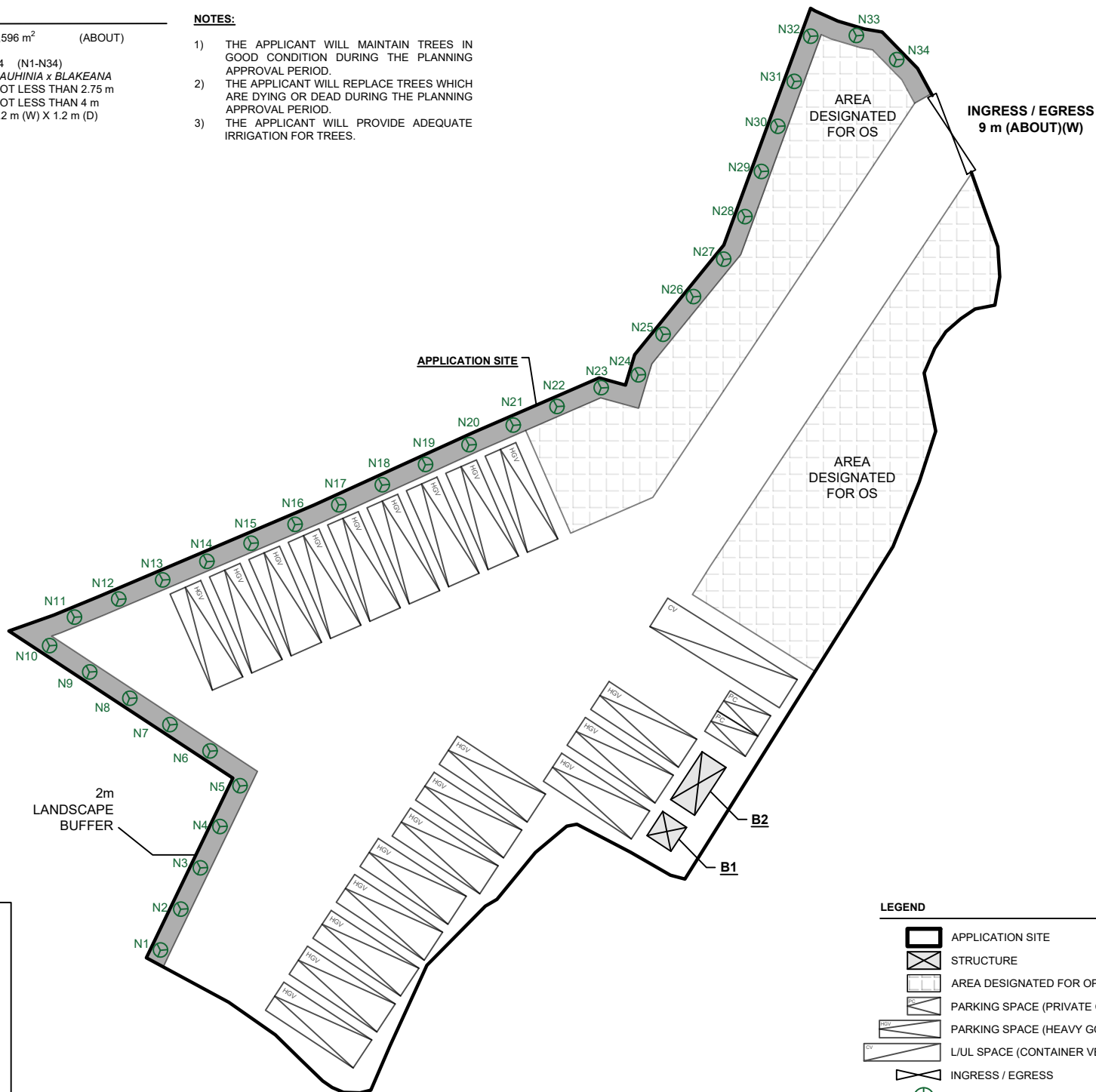
	<p>over area (B.O.A.) and height of the existing structures erected on the Site both exceeded the proposed 2 number of structures with B.O.A. of 27 m² and height of 3 m under the subject s.16 planning application.</p> <p>The Lot owner(s) shall rectify the irregularities by either demolishing unauthorized structures not covered by the subject application to tally with the layout plan or including all unauthorized structures erected on the Lot in the subject application immediately for the further consideration by the relevant departments and, subject to the approval of the Town Planning Board to the planning application which shall have reflected the rectification or amendment as aforesaid required, apply to this office for an STW to permit the structures 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 subject to such terms and conditions including payment of waive fee 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(s)/applicant for any breach at any point of time in future.</p>	<p>the current planning application are proposed structures, i.e. not yet erected.</p> <p>Meanwhile, other existing structures falling outside the site boundary of the current planning application are out of scope for the current planning application.</p> <p>Upon obtaining planning permission from the Board, the applicant will submit an application for STW to DLO/YL, LandsD for the erection of the proposed structures, i.e. with GFA of about 27 m² and building height of about 3 m, at the Site.</p>
(c)	<p>The Site is accessible to/from Shun Tat Street via a strip of Government land and various private lots in D.D.130. This office does not carry out maintenance works for the said Government land nor guarantee that any right-of-way over the Government land to the Site will be given.</p>	<p>Noted.</p>

Departmental Comments		Applicant's Responses
6. Comments of the District Planning Officer/Tuen Mun & Yuen Long West (DPO/TMYLW), PlanD		
(a)	It is noted from our site visit dated January 13, 2025 that the application site is currently used as a temporary Heavy Goods Vehicle Park and open storage of construction materials with ancillary facilities. As such, please clarify if the current use of the site is related to the application and whether site clearance will be carried out before the start of the planning permission period should the application be approved by the TPB in due course.	According to the applicant, the said operation at the Site is not related to the current application. Site clearance will be conducted before the start of the planning permission.

Annex 1
Landscape Plan

APPLICATION SITE AREA	: 4,596 m ²	(ABOUT)
NOS. OF TREE TO BE PLANTED	: 34	(N1-N34)
SPECIES OF NEW TREES	:	<i>BAUHINIA</i> x <i>BLAKEANA</i>
HEIGHT OF NEW TREES	: NOT LESS THAN 2.75 m	
SPACING OF NEW TREES	: NOT LESS THAN 4 m	
DIMENSION OF TREE TRENCH	: 1.2 m (W) X 1.2 m (D)	

- 1) THE APPLICANT WILL MAINTAIN TREES IN GOOD CONDITION DURING THE PLANNING APPROVAL PERIOD.
- 2) THE APPLICANT WILL REPLACE TREES WHICH ARE DYING OR DEAD DURING THE PLANNING APPROVAL PERIOD.
- 3) THE APPLICANT WILL PROVIDE ADEQUATE IRRIGATION FOR TREES.



PLANNING CONSULTANT



PROJECT

PROPOSED TEMPORARY HEAVY
GOODS VEHICLE PARK, OPEN
STORAGE OF CONSTRUCTION
MATERIALS AND MACHINERY
WITH ANCILLARY FACILITIES
FOR A PERIOD OF 3 YEARS

SITE LOCATION

LOT 2336 (PART) IN D.D. 130, NAI
WAI, TUEN MUN, NEW
TERRITORIES

SCALE

1 : 600 @ A4

DRAWN BY CC	DATE 11.02.2025
REVISED BY	DATE
APPROVED BY	DATE

DWG. TITLE
LANDSCAPE PLAN

DWG NO.	VER.
PLAN 1	001