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Sharon Tsun Tung WAN/PLAND

寄件者: Danny Ng [REDACTED]
寄件日期: 2025年04月02日星期三 16:46
收件者: tpbpd/PLAND
副本: Steven Kang Shun MA/PLAND; Sharon Tsun Tung WAN/PLAND; Bon Tang; Matthew Ng; Louis Tse; Christian Chim; Kevin Lam; Grace Wong
主旨: [FI] S.16 Planning Application No. A/TM-LTYT/484 - Further Information
附件: FI1 for A_TM-LTYT_484 (20250402).pdf

類別:

Dear Sir,

We write to submit further information in response to previous departmental comments of the subject application. The current submission intends to **supersede** both of our previous submissions at 31.03.2025 1204hrs and 01.04.2025 1258hrs in our preceding emails below.

Should you require more information, please do not hesitate to contact us. Thank you for your kind attention.

Kind Regards,

Danny NG | Town Planner
R-riches Group (HK) Limited

R-riches Property Consultants Limited | R-riches Planning Limited | R-riches Construction Limited

[REDACTED]

Our Ref.: DD130 Lot 2339 (Part)
Your Ref.: TPB/A/TM-LTY/484

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

By Email

2 April 2025

Dear Sir,

1st Further Information

**Temporary Wholesale Trade with Ancillary Storage
for a Period of 3 Years in “Residential (Group D)” Zone,
Lot 2339 (Part) in D.D. 130, Lam Tei, Tuen Mun, New Territories**

(S.16 Planning Application No. A/TM-LTY/484)

We write to submit further information to address departmental comments of the subject application (**Appendix I**).

Should you require more information regarding the application, please contact the undersigned at your convenience. Thank you for your kind attention.

Yours faithfully,

For and on behalf of
R-riches Property Consultants Limited



Danny NG
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

**Temporary Wholesale Trade with Ancillary Storage
for a Period of 3 Years in “Residential (Group D)” Zone,
Lot 2339 (Part) in D.D. 130, Lam Tei, Tuen Mun, New Territories**

(Application No. A/TM-LTYT/484)

- (i) A set of revised development parameters has adopted by the applicant, including a smaller site area from 819 sqm to about 750 sqm. with a larger GFA and plot ratio due to the 2-storey site office located within structure B1 as shown in the revised layout plan (**Plan 4**). The applicant believed that such amendment could effectively reflect the current situation of the application site (the Site). Other development parameters (including building height, site coverage, operation mode, etc.) remain unchanged.

A revised planning statement (**Annex I**) and a set of revised plans, including location plan; zoning plan; land status plan; layout plan and swept path analysis are submitted by the applicant to reflect the latest situation of the application site (the Site) (**Plans 1 to 5**); and

- (ii) A Response-to-Comments Table:

Departmental Comments		Applicant's Responses
1. Comments from the District Planning Officer/Tuen Mun and Yuen Long West, Planning Department (DPO/TM&YLW, PlanD)		
(a)	The existing ingress/egress point differs from that indicated in the Supplementary Planning Statement (SPS) (Para. 3.4, Layout Plan and Swept Path Analysis (Plans 4 and 5) refer);	Noted. A set of revised plans showing the updated existing ingress/egress point, as well as the revised planning statement are enclosed for your reference please (Plans 1, 4 and 5).
(b)	There is a 2-storey temporary structure (converted container(s)) within structure B1 but it is not included in the Application Form nor the SPS. Please clarify the major development parameters for the structure, including the use, GFA and BH, etc.	The 2-storey temporary structure located within structure B1 is used for site office with a GFA of 20 m ² . This is to provide indoor working space for administrative staff. A total of 2 administrative staff are expected to be working within the site office (Plan 4).
(c)	Noting from the previous application No. A/TM-LTYT/448 that the Site was used for wholesale trade (drinks and household goods) with ancillary storage. As such, please clarify the type of product(s) to be stored at the Site for the current application.	The applicant would like to clarify that the Site is designated for temporary wholesale trade of goods (drinks and household goods only) with ancillary storage use, which is also the same as the previous application (A/TM-LTYT/484). Such goods (drinks and household goods only) would be stored within the application site (the Site) sold in bulk to customers; when orders are

(d)	Response 1c refers. Please clarify if other types of goods apart from drinks or household goods will be stored within the application site.	placed, deliveries will be arranged with the applicant's vehicles or self-collection by customers.
(e)	Revised Supplementary Statement Para 3.1 refers. It is noted that the application site area is reduced from about 819 sqm to about 750 sqm. Please indicate specifically the change in site area in the submission document and provide justification for this revision.	To prepare for future possible economic downturn, the applicant had taken extra step to reduce the operation cost. The applicant considers the southwestern part of the site does not constitute a significant and crucial use to one's operation. By secluding the said part, the overall land renting and operation cost could be reduced effectively and thus relieving the burden of the applicant; at the same time, the current situation of the site is also reflected. This constitutes the reduction of the site area from 819 sqm to the newest site area of 750 sqm. The updated planning statement and related plans are enclosed for your reference please (Annexes I and II).

2. Comments from the Commissioner of Transport (C for T)

(a)	It is noted that a manoeuvring space is reserved in the open area of the proposed site. The applicant is reminded again that no queuing and/or waiting of motor vehicles from the site onto Shun Tat Street would occur and no motor vehicles shall be permitted to reverse into and out of the site onto Shun Tat Street.	Noted. The applicant will ensure no queuing and/or waiting of motor vehicles from the Site onto Shun Tat Street would occur and no motor vehicles would be permitted to reverse into and out of the Site onto Shun Tat Street.
(b)	The local access road between Shun Tat Street and the proposed site entrance is not a public road or footpath managed by this Office. Comments from relevant authorities should be sought.	Noted.
(c)	Please also provide the swept path of vehicles between the proposed site entrance and the vehicular access at Shun Tat Street via the local access road.	Noted and enclosed for your reference please (Plan 5).

(d)	It is noted in this application that the same vehicular access constructed by the previously approved application A/TM-LTYT/484 will be used for access of the proposed site and no further modification is required. However, HyD had commented that the constructed vehicular access did not comply with HyD standard. Please clarify.	Noted. The applicant will rectify the fault found according to the previous comments from Chief Highways Engineer, New Territories West, Highways Department (CHE/NTW, HyD) after the planning application is approved by the Town Planning Board (the Board). Photographic records of the rectified run-in/out would be submitted to relevant departments for consideration once rectification work is completed.
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Supplementary Statement

1) Background

- 1.1 The applicant seeks planning permission from the Town Planning Board (the Board) to use *Lot 2339 (Part) in D.D. 130, Lam Tei, Tuen Mun, New Territories* (the Site) for ‘**Temporary Wholesale Trade with Ancillary Storage for a Period of 3 Years**’ (the development) (**Plans 1 to 3**).
- 1.2 The applicant would like to continue to use the Site to operate the applied use to serve nearby local individuals, as well as local retailers. The applied use, temporary wholesale trade with ancillary storage use, is also the same as the previous application (A/TM-LTYT/484). Wholesale of trading of goods (drinks and household goods only) are packaged in bulk and purchased directly from manufacturers in large quantities by the applicant. The goods (drinks and household goods only) would be stored within the application site (the Site) sold in bulk to customers; when orders are placed, deliveries will be arranged with the applicant’s vehicles or self-collection by customers.

2) Planning Context

- 2.1 The Site currently falls within an area zoned as “Residential (Group D)” (“R(D)”) on the Approved Lam Tei and Yick Yuen Outline Zoning Plan (OZP) No.: S/TM-LTYT/12. According to the Notes of the OZP, the applied use is neither Column 1 nor 2 use within the “R(D)” zone, which will require planning permission from the Board.
- 2.2 Although the Site falls within the “R(D)” zone, the Site has been occupied by brownfield activities for decades. Furthermore, as there is no known long-term programme to develop the Site for residential use, approval of the current application on a temporary basis would not frustrate the long-term planning intention of the “R(D)” zone and would better utilise deserted land in the New Territories.
- 2.3 The Site is the subject of two previous S.16 planning applications (No. A/TM-LTYT/404 and A/TM-LTYT/448) for ‘*wholesale trade with ancillary storage*’ use (both submitted by the same applicant for the same use as the current application), which was approved by the Board in 2020 and 2023 respectively. Therefore, approval of the current application is in line with the Board’s previous decisions. Comparing with the previous application (No. A/TM-LTYT/448),

the site area is smaller; whilst a larger GFA is adopted since an additional structure is enclosed within the original structure. Concerning the smaller site area, the applicant had taken extra step to reduce the operation cost to prepare for future possible economic downturn. The applicant considers the southwestern part of the site does not constitute a significant and crucial use to one’s operation. By secluding the said part, the overall land renting and operation cost could be reduced effectively and thus relieving the burden of the applicant; at the same time, the current situation of the site is also reflected. This constitutes the reduction of the site area from 819 sqm to the newest site area of 750 sqm. The operation mode remains unchanged. The applicant has made effort to comply with approval conditions of the previous application, details are shown at **Table 1** below:

Table 1 – Details of Compliance with Approval Conditions of the Previous Application

Approval Conditions of Application No. A/TM-LTY/448		Date of Compliance
(a)	The implementation of the drainage proposal	23/04/2024
(c)	The submission of a fire service installations (FSIs) proposal	Not complied with
(d)	The implementation of the FSIs proposal	Not complied with
(e)	The implementation of the run-in/out proposal	Not complied with

- 2.4 During the operation of the previous application, the applicant has submitted and implemented drainage proposal, as well as submitted FSIs proposals and made effort in implementing the run-in/out proposal. Regarding fire service related conditions, the applicant submitted FSIs proposals for compliance with condition (c) on 12.04.2024 and 06.05.2024, whilst both submissions were considered not acceptable by the Director of Fire Services (D of FS) on 26.04.2024 and 21.05.2024.
- 2.5 Regarding condition (e), the applicant submitted photographic records showing the existing run-in/out at the access point of Shun Tat Street for compliance with approval condition (e) on 01.08.2024 and was considered not acceptable by the Chief Highway Engineer/New Territories West, Highways Department (CHE/NTW, HyD) and Commissioner of Transport (C for T) on 04.09.2024. However, the applicant did not have sufficient time to rectify faults found in the submissions with reference to relevant departmental comments during the planning approval period of the previous application, which led to revocation of the application on 05.11.2024.

2.6 After liaising with the FSIs consultant, as well as both run-in/out consultant and contractor, the applicant intends to rectify the faults found from respective government departments regarding the FSIs proposal and the existing run-in/out between the site and Shun Tat Street during the planning approval period of the current application. In support of the application, the applicant has submitted a number of proposals, including previously accepted drainage proposal and photographic records of existing drainage facilities, a fresh FSIs proposal and previously accepted run-in/out proposal to minimise potential impact(s) to the surrounding areas, as well as for the consideration of relevant Government Bureaux/Departments and members of the Board (**Appendices I to IV**).

3) Development Proposal

3.1 The site occupies an area of 750 m² (about) (**Plan 3**). Two 1-storey structures are provided at the Site for wholesale trade and ancillary storage of goods and site office, as well as canopy uses with total GFA of 770 m² (about) (**Plan 4**). The site office is a 2-storey structure located within structure B1 with a GFA of 20 m² (**Plan 4**). The operation hours of the Site are Mondays to Saturdays from 09:00 to 19:00. There will be no operation on Sundays and public holidays. The number of staff working at the Site is 5. It is anticipated that the Site would be able to attract about 10 visitors per day. Details of development parameters are shown at **Table 2** below:

Table 2 – Major Development Parameters

Application Site Area	750 m ² (about)
Covered Area	750 m ² (about)
Uncovered Area	N/A
Plot Ratio	1.03 (about)
Site Coverage	100% (about)
Number of Structure	2
Total GFA	770 m ² (about)
- Domestic GFA	Not applicable
- Non-Domestic GFA	770 m ² (about)
Building Height	11 m (about)
No. of Storey	1

- 3.2 The Site is accessible from Shun Tat Street via a local access (**Plan 1**). A total of 2 loading/unloading (L/UL) spaces for light goods vehicles (LGV) are provided. Staff will be deployed by the applicant to direct vehicles entering/exiting the Site to ensure pedestrian safety to/from the Site. Sufficient space is provided for vehicles to smoothly manoeuvre within the Site to ensure that no vehicle will turn back onto the local access (**Plan 5**). Details of L/UL spaces provision are shown at **Table 3** below:

Table 3 – L/UL Provisions

Type of Space(s)	No. of Space(s)
L/UL space for LGV - 3.5 m (W) x 7 m (L)	2

- 3.3 Staff are expected to access the Site by nearby public transport services, which are available in the vicinity of the Site. Visitors arriving by LGVs are required to access the site with advance booking, this could help to regulate the number of visitor(s) and vehicle(s) at the Site and without affecting the public. As such, the adverse traffic impact arising from the development is not anticipated.
- 3.4 Only LGVs are allowed to enter/exit the Site at any time during the planning approval period. No medium or heavy goods vehicles exceeding 5.5 tonnes, including container tractors/trailers are allowed to enter/exit the Site. The applicant will ensure no queuing and/or waiting of motor vehicles from the Site onto Shun Tat Street and no motor vehicles will be permitted to reverse into and out of the Site onto Shun Tat Street. The trip generation and attraction rates are as shown at **Table 4** below.

Table 4 – Trip Generation and Attraction of the Development

Time Period	LGV		2-Way Total
	In	Out	
Trips at <u>AM peak</u> per hour (09:00 - 10:00)	2	0	2
Trips at <u>PM peak</u> per hour (17:00 - 18:00)	0	2	2
Traffic trip per hour (10:00 - 17:00)	1	1	2

- 3.5 Relevant environmental protection/pollution control ordinances, i.e. *Water Pollution Control Ordinance*, *Air Pollution Control Ordinance*, *Noise Control Ordinance* etc. will be strictly complied with at all times during the planning approval period. The applicant will also follow relevant mitigation measures and requirements in the latest ‘*Code of Practice on Handling the Environmental Aspects of Temporary Uses and Open Storage Sites*’ issued by the Environmental Protection Department to minimise adverse environmental impacts and nuisance to the surrounding area.

4) Conclusion

- 4.1 The development has not been creating significant nuisance to the surrounding areas. Adequate mitigation measures are provided by the applicant, i.e. the submission of previously approved submission and implementation of drainage proposal, a FSI proposal, and previously approved run-in/out proposal to mitigate any adverse impact arising from the development (**Appendices I to IV**).
- 4.2 In view of the above, the Board is hereby respectfully recommended to approve the subject application for ‘**Temporary Wholesale Trade with Ancillary Storage for a Period of 3 Years**’.

R-riches Property Consultants Limited

January 2025

LIST OF PLANS

Plan 1	Location Plan
Plan 2	Plan Showing the Zoning of the Site
Plan 3	Plan Showing the Land Status of the Site
Plan 4	Layout Plan
Plan 5	Swept Path Analysis (LGV)

APPENDICES

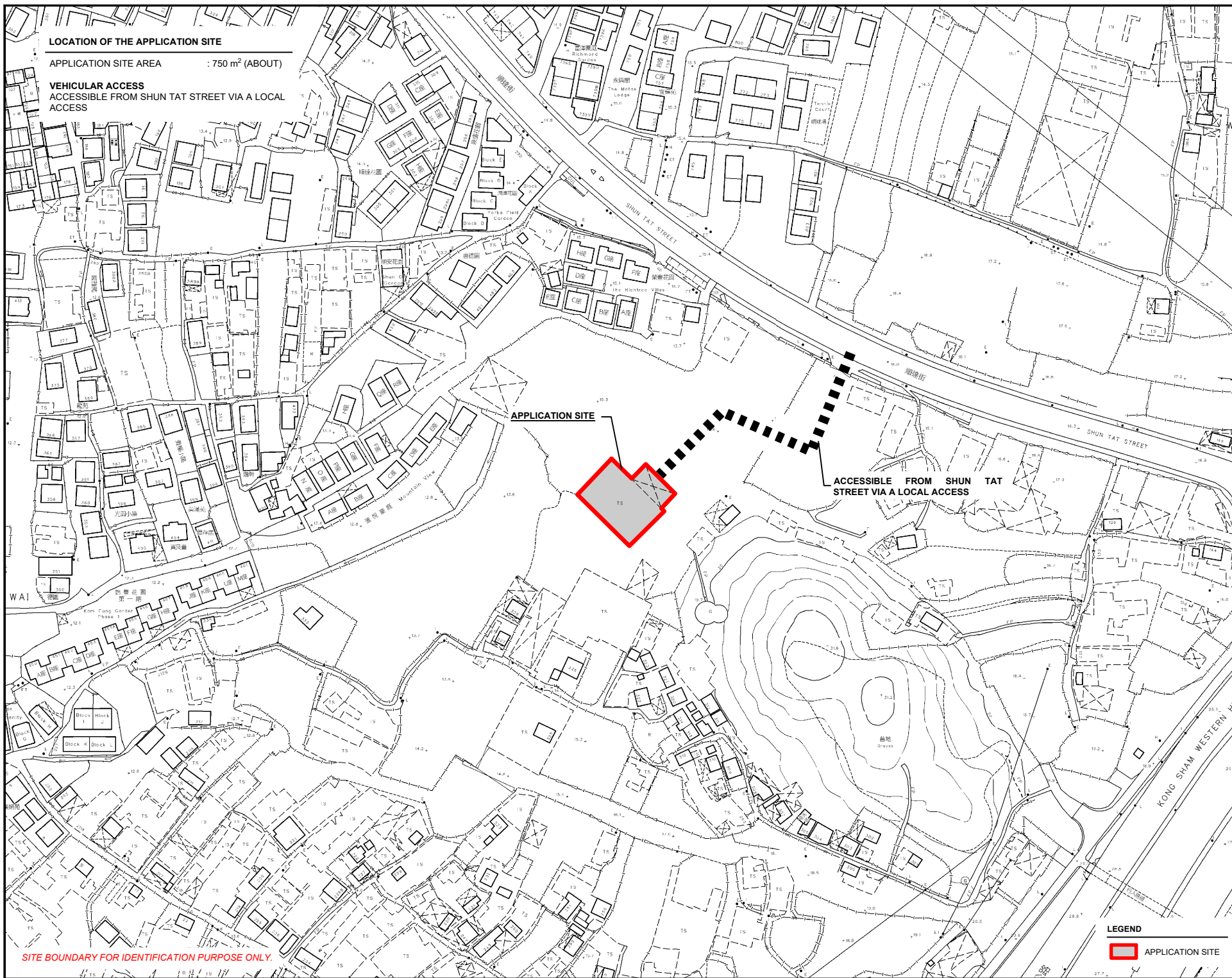
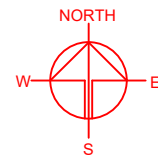
Appendix I	Accepted Drainage Proposal under Application No. A/TM-LTYT/404
Appendix II	Accepted Implementation of the Drainage Proposal under Application No. A/TM-LTYT/448
Appendix III	Fire Service Installations Proposal
Appendix IV	Accepted Run-in/out Proposal under Application No. A/TM-LTYT/404

LOCATION OF THE APPLICATION SITE

APPLICATION SITE AREA : 750 m² (ABOUT)

VEHICULAR ACCESS

ACCESSIBLE FROM SHUN TAT STREET VIA A LOCAL ACCESS



SITE BOUNDARY FOR IDENTIFICATION PURPOSE ONLY.

PLANNING CONSULTANT



PROJECT

PROPOSED WHOLESALE TRADE WITH ANCILLARY STORAGE FOR A PERIOD OF 3 YEARS

TEMPORARY TRADE WITH ANCILLARY STORAGE FOR A PERIOD OF 3 YEARS

SITE LOCATION

LOT 2339 (PART) IN D.D. 130, LAM TEI, TUEN MUN, NEW TERRITORIES

SCALE

1 : 2000 @ A4

DRAWN BY

MN

CHECKED BY

APPROVED BY

DATE

19.3.2025

DATE

DATE

DWG. TITLE

LOCATION PLAN

DWG NO.

PLAN 1

VER.

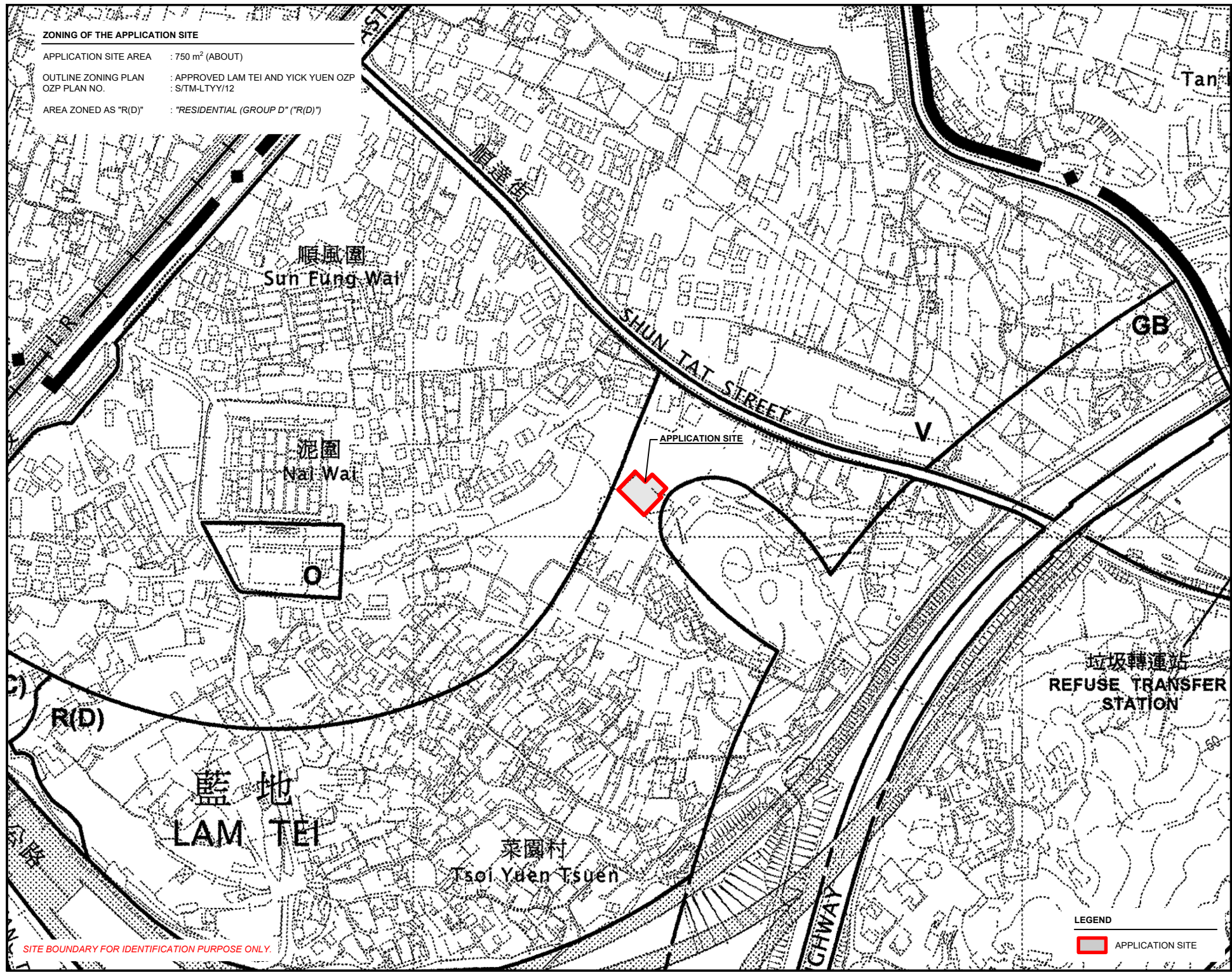
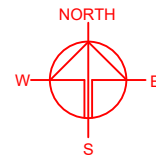
001

ZONING OF THE APPLICATION SITE

APPLICATION SITE AREA : 750 m² (ABOUT)

OUTLINE ZONING PLAN : APPROVED LAM TEI AND YICK YUEN OZP
OZP PLAN NO. : S/TM-LTTY/12

AREA ZONED AS "R(D)" : "RESIDENTIAL (GROUP D)" ("R(D)")



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LEGEND

 APPLICATION SITE

PLANNING CONSULTANT



PROJECT

PROPOSED WHOLESALE ANCILLARY STORAGE WITH TEMPORARY TRADE WITH PERIOD OF 3 YEARS

SITE LOCATION

LOT 2339 (PART) IN D.D. 130, LAM TEI, TUEN MUN, NEW TERRITORIES

SCALE

1 : 4000 @ A4

DRAWN BY

MN

DATE

19.3.2025

CHECKED BY

DATE

APPROVED BY

DATE

DWG. TITLE

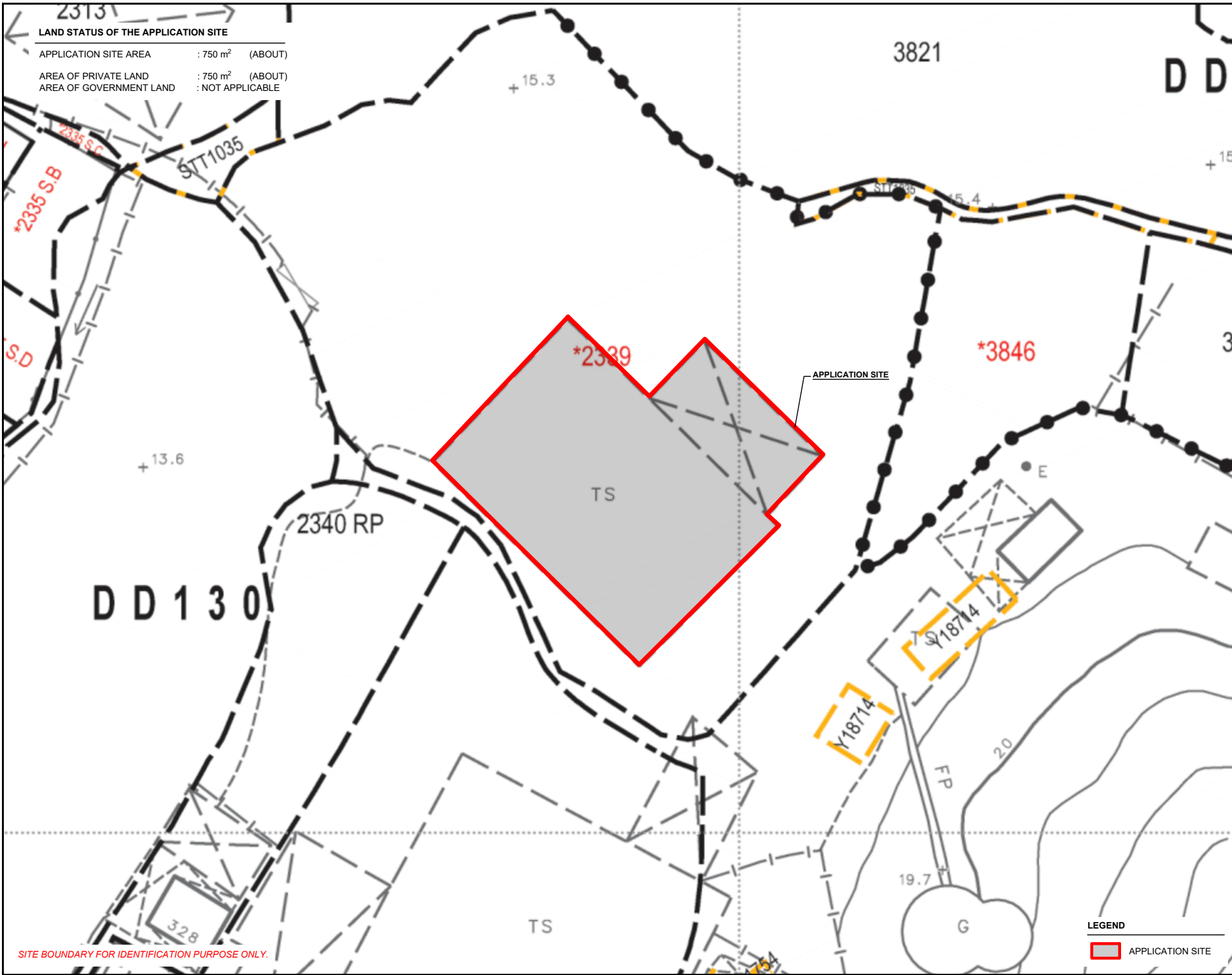
ZONING OF THE SITE

DWG NO.

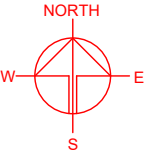
PLAN 2

VER.

001



LAND STATUS OF THE APPLICATION SITE		
APPLICATION SITE AREA	: 750 m ²	(ABOUT)
AREA OF PRIVATE LAND	: 750 m ²	(ABOUT)
AREA OF GOVERNMENT LAND	: NOT APPLICABLE	



PLANNING CONSULTANT
R-Riches
Property Consultants Ltd.

PROJECT
PROPOSED TEMPORARY
WHOLESALE TRADE WITH
ANCILLARY STORAGE FOR A
PERIOD OF 3 YEARS

SITE LOCATION
LOT 2339 (PART) IN D.D. 130, LAM
TEI, TUEN MUN, NEW
TERRITORIES

SCALE
1 : 500 @ A4

DRAWN BY MN	DATE 19.3.2025
CHECKED BY	DATE
APPROVED BY	DATE

DWG. TITLE
LAND STATUS OF THE SITE

DWG NO. PLAN 3	VER. 001
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LEGEND
[Red outline box] APPLICATION SITE

SITE BOUNDARY FOR IDENTIFICATION PURPOSE ONLY.

DEVELOPMENT PARAMETERS

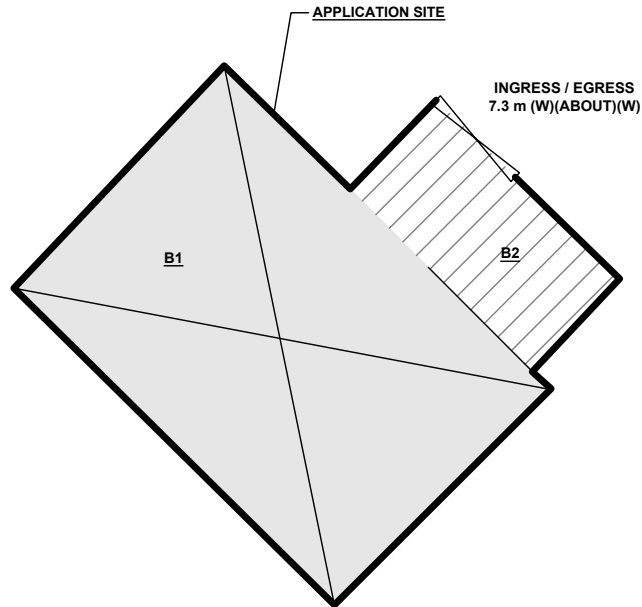
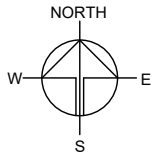
APPLICATION SITE AREA : 750 m² (ABOUT)
COVERED AREA : 750 m² (ABOUT)
UNCOVERED AREA : NOT APPLICABLE

PLOT RATIO : 1.03
SITE COVERAGE : 100%

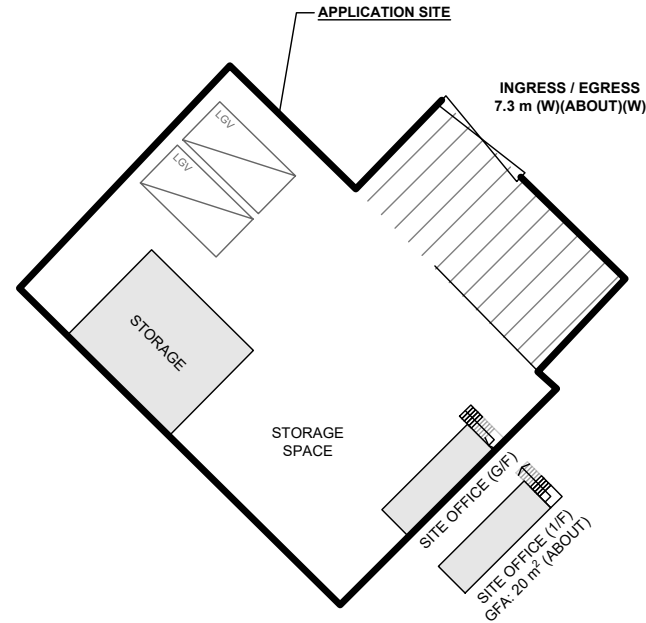
NO. OF STRUCTURE : 2
DOMESTIC GFA : NOT APPLICABLE
NON-DOMESTIC GFA : 770 m² (ABOUT)
TOTAL GFA : 770 m² (ABOUT)

BUILDING HEIGHT : 11 m (ABOUT)
NO. OF STOREY : 1

STRUCTURE	USE	COVERED AREA	GROSS FLOOR AREA	BUILDING HEIGHT
B1	WHOLESALE TRADE ANCILLARY STORAGE OF GOODS AND OFFICE	609 m ² (ABOUT)	629 m ² (ABOUT)	11m (ABOUT)(1-STOREY)
B2	CANOPY	141 m ² (ABOUT)	141 m ² (ABOUT)	11m (ABOUT)(1-STOREY)
TOTAL		750 m ² (ABOUT)	770 m ² (ABOUT)	



STRUCTURE LAYOUT



INTERNAL LAYOUT

PARKING AND LOADING/UNLOADING PROVISIONS

NO. OF L/U SPACE FOR LIGHT GOODS VEHICLE : 2
DIMENSION OF L/U SPACE : 3.5m (W) X 7m (L)

LEGEND

- APPLICATION SITE
- STRUCTURE (ENCLOSED)
- STRUCTURE (CANOPY)
- LOADING / UNLOADING SPACE
- INGRESS / EGRESS

PLANNING CONSULTANT



PROJECT

PROPOSED TEMPORARY
WHOLESALE TRADE WITH
ANCILLARY STORAGE FOR A
PERIOD OF 3 YEARS

SITE LOCATION

LOT 2339 (PART) IN D.D. 130, LAM
TEI, TUEN MUN, NEW
TERRITORIES

SCALE

1 : 500 @ A4

DRAWN BY MN	DATE 19.3.2025
CHECKED BY	DATE
APPROVED BY	DATE

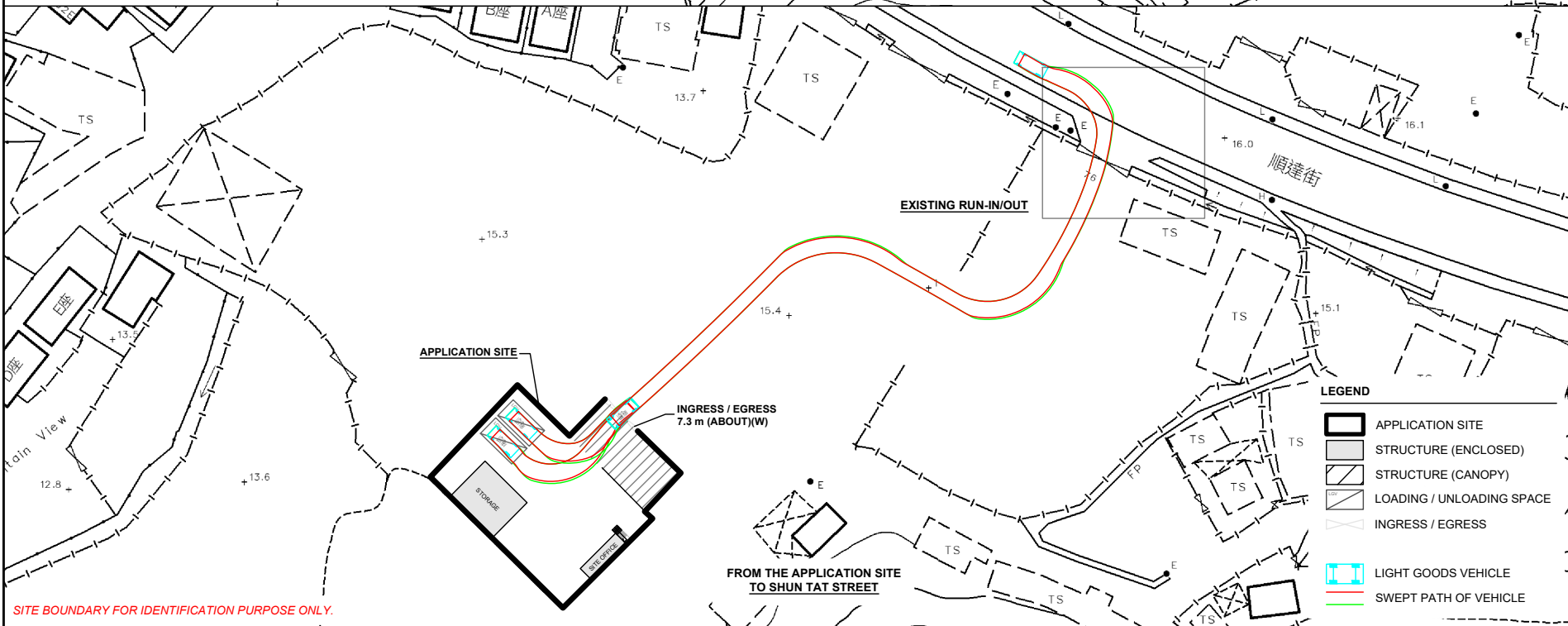
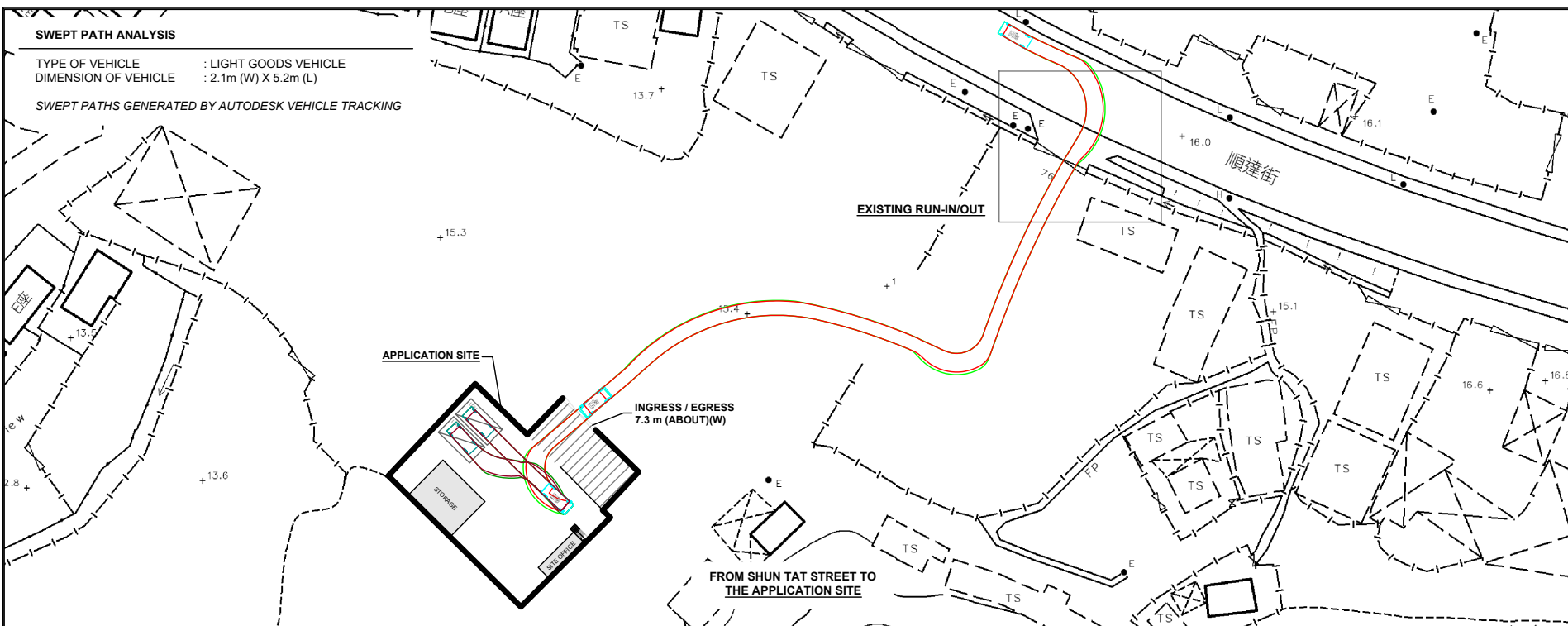
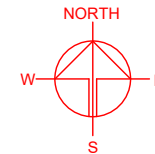
DWG. TITLE
LAYOUT PLAN

DWG NO. PLAN 4	VER. 002
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SWEPT PATH ANALYSIS

TYPE OF VEHICLE : LIGHT GOODS VEHICLE
DIMENSION OF VEHICLE : 2.1m (W) X 5.2m (L)

SWEPT PATHS GENERATED BY AUTODESK VEHICLE TRACKING



SITE BOUNDARY FOR IDENTIFICATION PURPOSE ONLY.

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PROJECT

PROPOSED WHOLESALE TRADE WITH ANCILLARY STORAGE FOR A PERIOD OF 3 YEARS

SITE LOCATION

LOT 2339 (PART) IN D.D. 130, LAM TEI, TUEN MUN, NEW TERRITORIES

SCALE

1:1000 @ A4

DRAWN BY

MN

DATE

19.3.2025

CHECKED BY

DATE

APPROVED BY

DATE

DWG. TITLE

SWEPT PATH ANALYSIS (LGV)

DWG NO.

PLAN 5

VER.

002

LEGEND

- APPLICATION SITE
- STRUCTURE (ENCLOSED)
- STRUCTURE (CANOPY)
- LOADING / UNLOADING SPACE
- INGRESS / EGRESS
- LIGHT GOODS VEHICLE
- SWEPT PATH OF VEHICLE