

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

30 April 2025

Dear Sir,

2nd 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-LTTY/484)

- (i) Upon obtaining the planning approval, the applicant affirms that the structures erected on the application site and their uses will tally with the layout as shown on Plan 4 of the 1st Further Information which submitted to the Town Planning Board (the Board) on 02.04.2025 during the planning approval period; and
- (ii) A Response-to-Comments Table:

Departmental Comments		Applicant's Responses
1. Comments from the Director of Fire Services (D of FS) Contact Person: Mr. CHEUNG Wing-hei (Tel.: 2739 8775)		
(a)	Emergency Lightning shall be provided in accordance with BS 5266-1:2016, BS EN 1838:2013 and the FSD Circular Letter No. 4/2021;	Noted and revised accordingly (Annex I).
(b)	Sprinkler system, modified hose reel system and fire alarm system shall also be provided to the 2-storey Site Office;	
(c)	The height of openable windows shall be indicated;	
(d)	The GFA of site office shall be included in the layout plan; and	
(e)	The no. of storey of Structure B including the site office shall be clarified.	
2. Comments from the District Lands Officer/Tuen Mun, Lands Department (DLO/TM, LandsD) Contact Person: Mr. Henry NG (Tel.: 2451 3249)		
(a)	The application site (the Site) comprises an Old Schedule Agricultural Lot, namely No. 2339 (Portion) 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 prior approval of the Government.	Noted. The applicant will submit another reissue of the Short Term Waiver (STW) application to rectify the structure(s) erected on the concerned lot after planning approval has been obtained from the Board. No structure is proposed for domestic use.

(b)	The Lot is covered by Short Term Waiver ("STW") No. 582 for the purpose of storage and repair of container boxes.	
(c)	Cancellation of STW No. 582 and reissue of STW application ("the Application") to permit the structure erected within the Lot for temporary wholesale trade with ancillary storage was approved in principle by this office subject to compliance with the Town Planning Ordinance. In the event that the planning permission is not given by the Town Planning Board, LandsD may decide not to consider the Application further. The Lot owner(s) is required to rectify the breaches to comply with the terms and conditions of STW No. 582. The Government reserves the right to terminate STW No. 582 subject to such terms and conditions as may be necessary and appropriate.	
(d)	<p>The following irregularities not covered by the subject planning application have been detected by this office:</p> <p>Unauthorised structure(s) within the Lot not covered by the planning application</p> <p>There are unauthorised structures on the Lot including a toilet and a porch not covered by the subject planning application. Our on-site measurement revealed that the built-over area (B.O.A.) of the existing structures erected on the Lot both exceeded the proposed B.O.A. of 819 m² under the subject S.16 planning application and the permitted B.O.A. of 125 m² under STW No. 582. The Lot owner(s) should immediately rectify/regularise the irregularities and this office reserves the rights to take necessary lease enforcement action against the irregularities without further notice.</p>	

	<p>The Lots owner(s) shall rectify the irregularities by either demolishing unauthorised structures not covered by the subject application or including all unauthorised structures erected on the Lot in the subject application tallying with the layout plan immediately. Unless and until the unauthorised structures are duly rectified by the Lot owner(s)/applicant, please take it as this office's objection to the application which must be brought to the attention of the Town Planning Board when they consider the application.</p>	
(e)	<p>The Site is assessable via a local access on Government land leading from Shun Tat Road and various private lots. The office does not carry out maintenance works for the said access nor guarantee that any right-of-way to the Site will be given. The Applicant shall be responsible for his own access arrangement.</p>	<p>Noted. The applicant will liaise with respective land owners regarding the access arrangement.</p>

F.S.NOTES:

1. GENERAL

- 1.1 FIRE SERVICE INSTALLATIONS SHALL BE PROVIDED IN ACCORDANCE WITH THE CODES OF PRACTICE FOR MINIMUM FIRE SERVICE INSTALLATIONS AND EQUIPMENT AND INSPECTION, TESTING AND MAINTENANCE OF INSTALLATIONS AND EQUIPMENT 2022 (COP 2022), FSD CIRCULAR LETTERS AND THE HONG KONG WATERWORKS STANDARD REQUIREMENTS.
- 1.2 THE AGGREGATE AREA OF OPENABLE WINDOWS NOT LESS THAN 6.25% OF THE FLOOR AREA OF THE STRUCTURE

2. HOSE REEL SYSTEM

- 2.1 NEW FIRE HOSE REEL SHALL BE PROVIDED AS INDICATED ON PLAN TO ENSURE THAT EVERY PART OF THE BUILDING CAN BE REACHED BY A LENGTH OF NOT MORE THAN 30m HOSE REEL TUBING.
- 2.2 THE WATER SUPPLY FOR HOSE REEL SYSTEM WILL BE FED FROM A NEW 2m³F.S. FIBREGLASS WATER TANK VIA TWO HOSE REEL PUMPS (DUTY/STANDBY) LOCATED INSIDE FS PUMP ROOM AT EXTERNAL AREA.
- 2.3 HOSE REEL PUMPS SHALL BE STARTED BY ACTUATION OF ANY BREAKGLASS UNIT FITTED ASIDE EACH HOSE REEL SETS
- 2.4 ALL FIRE HOSE REEL OUTLETS SHOULD BE HOUSED IN GLASS FRONTED CABINET SECURED UNDER LOCK & KEY.
- 2.5 ALL FIRE HOSE REEL SHOULD BE PROVIDED WITH FSD APPROVED TYPE INSTRUCTION PLATE & WSD WARNING PLATE
- 2.6 SECONDARY ELECTRICITY SUPPLY DIRECTLY TEE OFF BEFORE CLP'S INCOMING MAIN SWITCH SHALL BE PROVIDED FOR THE FH/HR PUMPS.

3. AUTOMATIC SPRINKLER SYSTEM

- 3.1 NEW AUTOMATIC SPRINKLER SYSTEM SHALL BE PROVIDED AND INSTALLED IN ACCORDANCE WITH LPC RULES FOR AUTOMATIC SPRINKLER INSTALLATIONS INCORPORATING BS EN 12845: 2015 (INCLUDING TECHNICAL BULLETINS, NOTES, COMMENTAR AND RECOMMENDATIONS) AND FSD CIRCULAR LETTER NOTES, COMMENTAR AND RECOMMENDATIONS) AND FSD CIRCULAR LETTER NO. 5/2020 ; AND. THE CLASSIFICATION OF THE OCCUPANCIES WILL BE ORDINARY HAZARD GROUP III.
- 3.2 ONE NEW 135m³ SPRINKLER WATER TANK WILL BE PROVIDED AS INDICATED ON PLAN. THE TOWN MAIN WATER SUPPLY WILL BE FED FROM SINGLE END.
- 3.3 TWO NEW SPRINKLER PUMPS (DUTY/STANDBY) AND ONE JOCKEY PUMP SHALL BE PROVIDED IN FS PUMP ROOM LOCATED AT EXTERNAL AREA.
- 3.4 NEW SPRINKLER CONTROL VALVE SET AND SPRINKLER INLET SHALL BE PROVIDED AS INDICATED ON PLAN.
- 3.5 SECONDARY ELECTRICITY SUPPLY DIRECTLY TEE OFF BEFORE CLP'S INCOMING MAIN SWITCH SHALL BE PROVIDED FOR THE SPRINKLER PUMPS.
- 3.6 THE SPRINKLER SYSTEM DESIGN IS BASED ON THE FOLLOWINGS:
HAZARD CLASS : ORDINARY HAZARD GROUP III
TYPE OF STORAGE : POST-PALLET (ST2)
STORAGE CATEGORY : CATEGORY I
MAXIMUM STORAGE HIEGHT : 3.5m
SPRINKLER PROTECTION : CEILING PROTECTION ONLY
THE MINIMUM CLEARANCE AROUND EACH SINGLE STORAGE CLOCK : 2.4m
MAXIMUM STORAGE AREA : 50m²

4. FIRE ALARM SYSTEM

- 4.1 NEW FIRE ALARM SYSTEM SHALL BE PROVIDED IN ACCORDANCE WITH BS 5839-1:2017 AND FSD CIRCULAR LETTERS NO. 6/2021.
- 4.2 NEW BREAKGLASS UNITS AND FIRE ALARM BELLS SHALL BE PROVIDED AT ALL NEW FIRE HOSE REEL POINTS. THE FIRE ALARM INTALLATION WILL BE INTEGRATED WITH THE HOSE REEL SYSTEM.

5. EMERGENCY LIGHTING

- 5.1 EMERGENCY LIGHTING SHALL BE PROVIDED IN ACCORDANCE WITH 'BS 5266: PART 1:2016 AND BS EN 1838 :2013" AND FSD CIRCULAR LETTER NO. 4/2021 COVERING ALL AREA. EMERGENCY LIGHTINGS SHALL BE BACKED UP BY BUILT-IN BATTERY AND CAPABLE OF MAINTAINING FUNCTION OF NOT LESS THAN 2 HOURS IN CASE OF POWER FAILURE

6. EXIT SIGN

- 6.1 ALL EXIT SIGNS/DIRECTIONAL EXIT SIGNS SHALL BE PROVIDED IN ACCORDANCE WITH 'BS 5266:-1:2016 AND FSD CIRCULAR LETTER NO. 5/2008, FOR THE BUILDING. EXIT SIGNS/DIRECTIONAL EXIT SIGNS SHALL BE BACKED UP BY BUILT-IN BATTERY AND CAPABLE OF MAINTAINING FUNCTION OF NOT LESS THAN 2 HOURS IN CASE OF POWER FAILURE.

7. PORTABLE APPLIANCES

- 7.1 PORTABLE HAND OPERATED APPLIANCES SHALL BE PROVIDED AS INDICATED ON PLAN.

LEGEND

HR HOSE REEL

BK BREAK GLASS UNIT

FAB FIRE ALARM BELL

EL EMERGENCY LIGHT

EXIT EXIT SIGN

NRV NON-RETURN VALVE

FE 5KG CO2 FIRE EXTINGUISHER

SB SAND BUCKET

SV SUBSIDIARY VALVE / FLOW SWITCH

SCV SPRINKLER CONTROL VALVE SET

GV GATE VALVE

GT GATE TYPE (With MONITORING)

PS PUMP SET

YS Y-TYPE STRAINER

SI SPRINKLER INLET

PG PRESSURE GAUGE

SH SPRINKLER HEAD (ON PLAN)

5KG DRY POWDER FIRE EXTINGUISHER

STRUCTURE	USE	COVERED AREA	GROSS FLOOR AREA	BUILDING HEIGHT
B1	(GF)	WHOLESALE TRADE ANCILLARY STORAGE OF GOODS AND G/F OF SITE OFFICE	609 m ² (ABOUT)	11m (ABOUT)(2-STOREY)*
	(GF)	1/F OF SITE OFFICE	20m ² (ABOUT)	
B2	CANOPY	141 m ² (ABOUT)	141 m ² (ABOUT)	11m (ABOUT)(1-STOREY)
TOTAL		750 m ² (ABOUT)	770 m ² (ABOUT)	

*ONLY THE OFFICE PORTION OF STRUCTURE B1 IS 2-STOREY

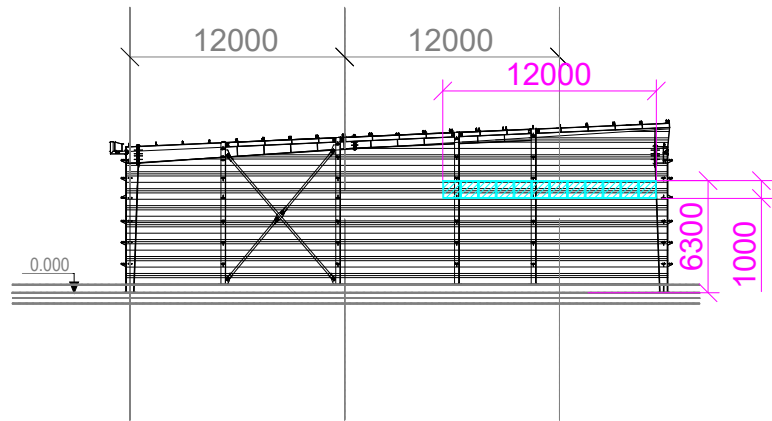
Structure B1 Openable Windows Calculation

Area of Structure B1 = 609 sq.m.

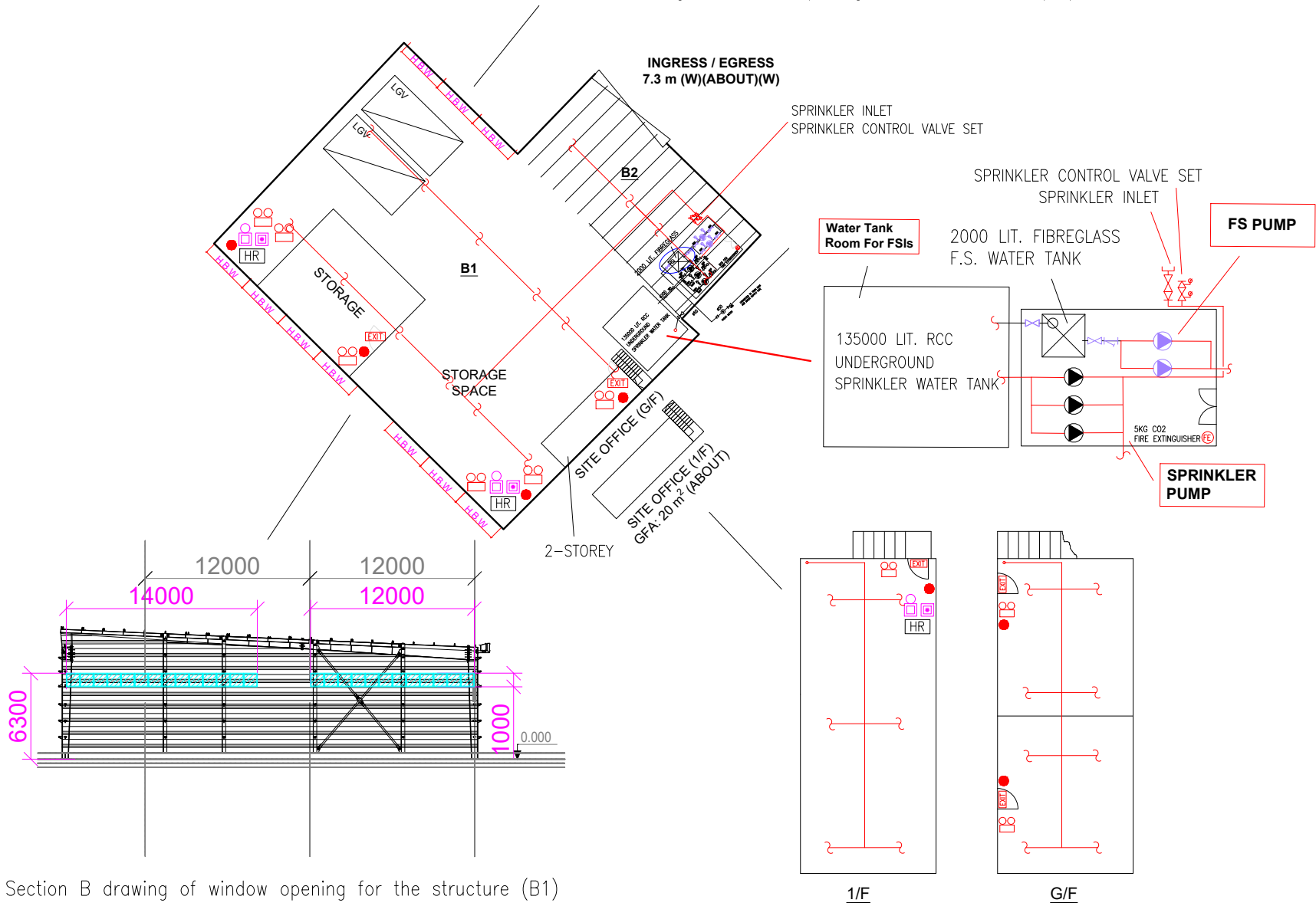
Area of High Bay Window (H.B.W.) = 1.1m(H) x 38m(total length) = 41.8 sq.m.

Total openable window area = 41.8 sq.m.

=6.86% of floor area



Section B drawing of window opening for the structure (B1)



PROJECT :
PROPOSED TEMPORARY SHOP AND SERVICES WITH ANCILLARY STORAGE
OF GOODS FOR A PERIOD OF 3 YEARS
LOT 2339 (PART) IN D.D. 130, LAM TEI, TUEN MUN, NEW TERRITORIES

DRAWING TITLE :
**F.S. Notes, Legend,
Fire Service Installation
Layout Plan**

REV	DESCRIPTION	DATE

ARCHITECT :

CONSULTANT :

FIRE SERVICE CONTRACTOR :
**Century Fire Service
Engineering Co., Ltd.**

DRAWN BY	C.K.NG	DATE	28 Apr 2025
CHECKED BY			
APPROVED BY			

DRAWING NO : FS-01	REV. 0
SCALE : 1 : 150 (A0)	
SOURCE : B.O.O. Ref. BD F.S.D. Ref. FP	