

Our Ref.: TW/TPN/2608BA/L08

27 November 2025

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

By Email and Post

Dear Sir/Madam,

**Planning Application for
Proposed Minor Relaxation of Plot Ratio Restriction
for a Permitted House Development
No. 313 Castle Peak Road – Ting Kau, New Territories
(Lot No. 405 in DD 399)
(Planning Application No. A/TWW134)**

We refer to the captioned case and the departmental comments received on 15 September 2025, 29 September 2025 and 30 October 2025, and would like to respond as follows.

<u>Comments received on 15 September 2025</u>		
Comments		Responses
Comments from District Planning Office (Contact Person: Ms. Iris YIK // Tel.: 2417 6661)		
1.	Please advise whether the area of the bridge access, as shown on the 1/F floor plan, is included in the GFA calculation.	The shadowed area of bridge access on 1/F should be included in G/F GFA calculation.
2.	It is noted that the lot index plan indicates the lawn area at a level of 10.4mPD, while the G/F floor plan shows the lawn at a level of 12mPD. Please clarify this discrepancy.	To facilitate the foundation design of proposed development, it is proposed to raise up the existing lawn level to 12mPD.

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Comments received on 29 September 2025		
	Comments	Responses
1.	Comments from Buildings Department (Contact Person: Ms. Helie CHAN // Tel.: 2626 1429)	
1	It is noted that 1 structure is proposed in your application. Before any new building works (including demolition, land filling, etc.) are to be carried out on the application site, prior approval and consent of the BA should be obtained, otherwise they are unauthorized building works (UBW) under the Buildings Ordinance (BO). An Authorized Person should be appointed as the co-ordinator for the proposed building works in accordance with the BO.	Comments from Buildings Department are noted and will be observed.
2	The site shall be provided with means of obtaining access thereto from a street and emergency vehicular access in accordance with Regulations 5 and 41D of the Building (Planning) Regulations (B(P)R) respectively.	
3	The site does not abut on a specified street of not less than 4.5m wide and its permitted development intensity shall be determined under Regulation 19(3) of the B(P)R at building plan submission stage.	
4	If the existing structures (not being a New Territories Exempted House) are erected on leased land without the approval of the BA, they are UBW under the BO and should not be designated for any proposed use under the captioned application.	

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	Comments	Responses
5	For UBW erected on leased land, enforcement action may be taken by the Buildings Department to effect their removal in accordance with the prevailing enforcement policy against UBW as and when necessary. The granting of any planning approval should not be construed as an acceptance of any existing building works or UBW on the application site under the BO.	
6	Any temporary shelters or converted containers for office, storage, washroom or other uses are considered as temporary buildings are subject to the control of Part VII of the B(P)R.	
7.	Detailed checking under the BO will be carried out at building plan submission stage.	
2.	Comments from Lands Department (Contact Person: Mr. Koby KO // Tel.: 2402 1064)	
	This office reserves our comments on the proposed schematic design which would only be examined in detail during the building plan submission stage. There is no guarantee that the schematic design as presently proposed in the subject S.16 planning application if reflected in future building plan submission(s) will be acceptable under lease.	Noted.

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	Comments	Responses
3.	Comments from Transport Department (Contact Person: Mr. Stanley SIN // Tel.: 2399 2233)	
	The response of the applicant to our previous comments provided only in the R-to-C table is insufficient. Since the planning application lacks a proper section about traffic review or a traffic impact assessment to properly address our traffic concerns, the applicant should include a specific traffic review in the planning application. The relevant section should address our concerns raised and substantiate the reply.	Attached please find the Traffic Review for your reference.
4.	Comments from Landscape Unit, Urban Design & Landscape Section, PlanD (Contact Person: Mr. Justin OR // Tel: 3565 3948)	
	Having reviewed the submission, it is noted that our comment provided vide email regarding the discrepancy of the existing trees between the aerial photos, Appendix 2 (Photographs taken on site) and the Part 9 of the application form no.S16-I, is not fully addressed in the deliverable. Thus, our previous comment remains valid, and the applicant is advised to make reference to the Annex B of “APPLICATION FOR PERMISSION UNDER SECTION 16 OF THE TOWN PLANNING ORDINANCE (CAP. 131) GUIDANCE NOTES”, regarding the submission of technical assessment of landscape aspect required for the application.	Please refer to our letter dated 2 October 2025 under reference no. TW/TPN/2608BA/L05.

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	Comments	Responses
5.	Comments from Geotechnical Engineering Office, CEDD (Contact Person: Ms. Celia YANG // Tel: 2762 5372)	
	R-to-C item no. 2-1: The subject planning application could affect or be affected by Feature Nos. 6SE-D/FR57, 6SE-D/FR203, 6SE-D/R113, 6SE-D/R114, 6SE-D/R115, 6SE-D/R158 and 6SE-D/R215, and meets the criteria for submission of a Geotechnical Planning Review Report (GPRR) as per our previous memo. In accordance with the Guidance Notes on Application for Permission under Section 16 of the Town Planning Ordinance (CAP 131), please be reminded to submit a GPRR to support the application.	Attached please find the Geotechnical Planning Review Report (3 copies) for your reference.
<u>Comments received on 30 October 2025</u>		
	Comments from Landscape Unit, Urban Design & Landscape Section, PlanD (Contact Person: Mr. Justin OR // Tel: 3565 3948)	
1.	A discrepancy in the title is observed between the title of Appendix B ("Tree Survey Schedule" (p. 09)) and the title of the table ("Tree Assessment Schedule") in Appendix B.	Appendix B in the content page (p.02) and the title of Appendix B (p.09) have been revised from "Tree Survey Schedule" to "Tree Assessment Schedule. The changes in the report are highlighted in yellow for ease of reference.
2.	With reference to Appendix B (Tree Survey Schedule), the column "Survival Rate After Transplantation" under the Tree Assessment Schedule, all trees are rated as "Low" for suitability for transplanting. However, the tree species (e.g., <i>Dyopsis lutescens</i>) is suitable for transplanting under average conditions with no defects. The applicant should critically review the suitability ratings for transplanting the trees. If the current	The low suitability ratings for transplanting all trees remain unchanged after review. Justification for tree felling and explanatory remarks are added to Appendix B "Tree Assessment Schedule" (p.10) for all trees to support the current ratings.


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	Comments	Responses
	ratings would be remained unchanged, explanatory remarks should be added to the Tree Survey Schedule.	
3.	It is noted that seven existing trees are proposed to be felled. However, mitigation measure or compensatory trees are not proposed. The applicant is advised to provide mitigation measure to mitigate / compensate the impact on the existing landscape resources and to illustrate these measures on a Landscape Plan for reference.	We would propose to impose a planning condition requiring to provide the mitigation measure proposal.
4.	<u>Advisory Comment</u> The applicant is reminded that approval of the planning application under Town Planning Ordinance does not imply approval of tree preservation/removal scheme under lease. Thus, the applicant should seek comments and approval from the relevant authority on the tree works concerned and/or compensatory/replacement planting proposal, where appropriate.	Noted.
5.	Please be reminded that the approval of the Planning Application does not imply approval of the site coverage of greenery requirements under BD's PNAP APP-152 and/or under lease. The site coverage of greening calculation should be submitted separately to BD for approval.	Noted.

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Should you have any queries, please feel free to contact our Ms. Cherin Ng or the undersigned at 2301-1869.

Yours faithfully,
For and on behalf of
LANBASE SURVEYORS LIMITED


p.p. Rock K. M. Tsang
Director
RK/CN
Encl.

c.c. Client
DPO/ Tsuen Wan and West Kowloon (Attn: Miss Iris Yik)

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(Planning Application No. A/TWW134)**

TRAFFIC REVIEW

26 November 2025

1. Background

Lot 405 in DD 399 (the “Application site”) is separated from Castle Peak Road – Ting Kau, by a strip of government land. At present, pedestrian access to the Application Site from Castle Peak Road – Ting Kau is via a staircase which is provided on the east of the Application Site. There is no vehicular access to the Application Site, residents would rely on public transport available in the vicinity.

The Applicants intend to seek approval from the Town Planning Board to redevelop the existing 2-storey residential development erected at the Application Site into a house with plot ratio of 0.75. This traffic review is prepared in support of the planning application.

2. Traffic Review

2.1 No Increase in Number of Residents

Despite the proposed increase in plot ratio from 0.4 to 0.75, the proposed redevelopment being continued to be a single-family residence will not result in any increase in number of residents. No additional traffic is expected.

2.2 Car Parking Facilities

There is no vehicular access, parking and loading/unloading facility in the proposed house development that is the same as its current condition. Residents would rely on public transport available in the vicinity.

2.3 Pedestrian Movements

The pedestrian movements of the residents will continue to use the existing public footpath on the east of the Application Site without alteration.

3. Conclusion

The redevelopment of house will not result in increase of residents. The residents would rely on public transport and access the Application Site via a staircase on the east of the Application Site maintaining the current conditions. No adverse traffic implications of any kind are therefore anticipated.