

寄件者: lo mingkong [REDACTED]
寄件日期: 2025年09月03日星期三 16:03
收件者: tpbpd/PLAND
副本: Jet Sze Jet CHEUNG/PLAND; Andrea Wing Yin YAN/PLAND; Leung Raymond
主旨: (A/YL-KTN/1151) - Response to Departmental Comments
附件: TPB_L02 RtoC.pdf; Appendix 1.pdf; Appendix2.pdf; Appendix3.pdf; Appendix4.pdf; 20250903 Consolidated_RTC.pdf

類別: Internet Email

Dear Sir/Madam,

In response to the comments suggested by the Transport Department dated 30.7.2025, the Environmental Protection Department dated 18.8.2025, the Agriculture, Fisheries and Conservation Department dated 25.8.2025, and the Lands Department dated 25.8.2025, we would like to submit herewith our responses for your consideration. **(Please refer to the Consolidated RtoC table and Appendix 1-4)**

Should you have any queries or require further information, please feel free to contact the undersigned at [REDACTED]

Best Regards,

Lo Ming Kong
Top Bright Consultants Ltd.
[REDACTED]



才鴻顧問有限公司
TOP BRIGHT CONSULTANTS LIMITED

Our Ref.: 25/858/L02

Your Ref.: A/YL-KTN/1151

September 3, 2025

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

By Email

Dear Sir/Madam,

Temporary Place of Recreation, Sports or Culture with Ancillary Facilities and Associated Filling of Land for a Period of 3 Years in “Agriculture” and “Village Type Development” Zones, Lots 655(Part), 656(Part), 657(Part), 668(Part), 669(Part), 671(Part), 672SA(Part), 674(Part), 678(Part), 679(Part), 680(Part), 681, 682(Part), 684RP(Part), 763SA(Part), 763RP(Part), 764, 765, 766(Part), 768(Part), 769(Part), 770(Part), 771(Part), 772(Part), 781(Part), 782(Part), 783(Part), 784(Part), 785(Part), 786(Part), 787, 788(Part), 1615(Part) and Adjoining Government Land in DD109, Shui Mei Tsuen, Kam Tin North, Yuen Long, New Territories

Dear Sir/Madam,

In response to the comments suggested by the Transport Department dated 30.7.2025, the Environmental Protection Department dated 18.8.2025, the Agriculture, Fisheries and Conservation Department dated 25.8.2025 and the Lands Department dated 25.8.2025, we would like to submit herewith our responses for your consideration.

Should you have any queries or require further information, please feel free to contact the undersigned at [REDACTED]

Yours faithfully,
For and on behalf of
Top Bright Consultants Ltd.


Lo Ming Kong

Encl.
c.c. Kam Tin Country Club Ltd. (the Applicant)



Responses to Departmental Comments

Departmental Comments		Responses
A.	Transport Department [Email dated 30.7.2025] (Contact Person: Mr. Louis HON Tel: 2399 2427)	
1.	Please provide the hourly estimated traffic trips.	Please refer to Appendix 1 for the hourly estimated traffic trips.
B.	Environmental Protection Department [Email dated 18.8.2025] (Contact Person: Mr. Kelvin WONG Tel: 2835 1117)	
1.	Please advise whether the basketball courts proposed at the Site will be enclosed; and	The basketball courts will be partially fenced off with ball containment nets or backyard basketball court netting (see Appendix 2). To minimize disturbance to nearby residents, the opening hours of the basketball courts will be restricted to 9:00 a.m. - 11:00 a.m. and 4:00 p.m.- 6:00 p.m.
2.	Please clarify whether there will be mitigation measures (e.g., animals will stay within enclosed structures equipped with soundproofing materials) that will be adopted to control potential environmental impacts (e.g. odour, noise, waste) from animals to be accommodated at the Site.	The animals will be kept in shed structures that do not have soundproofing materials. Since only 8-10 rabbits and 2-3 goats will be kept in the shed, their accommodation will be cleaned hourly by on-site staff during operating hours. No complaints were received from surrounding villagers/residents in the past. Therefore, the environmental impacts (odour, noise and waste) will be negligible.

Departmental Comments		Responses
C.	Agriculture, Fisheries and Conservation Department [Email dated 25.8.2025] (Contact Person: Ms. WONG Cheuk-ling Tel: 2150 6933)	
1.	It is noted that a pond intended for amenity purpose is located within the subject site, and another pond is identified next to the subject site as well. Based on the recent aerial photo, both ponds are considered to have potential for aquaculture use. In light of this, the applicant is advised to implement appropriate measures to prevent deterioration of water quality of both ponds during the construction and operation of subject site.	Noted. The following measures will be adopted to prevent the deterioration of water quality: (a) No recreational activities will be organised in these ponds. (b) Visitors will not be allowed to access the pond area. (c) No foul water or sewerage will be discharged into the ponds. (d) No chemicals, pesticides and fertilizers are allowed to be used at the site. (e) Notice will be posted at the site to prevent littering. Any solid waste will be put into covered rubbish bins.
D.	District Lands Officer, Lands Department [Email dated 25.8.2025] (Contact Person: Ms. S.L. CHENG at 2443 1072)	
1.	I must point out that the following regularities covered by the subject planning application have been detected by this office: <u>Unauthorised structure(s) within the said private lot(s) covered by the planning application</u> LandsD has reservation on the planning application since there are unauthorized structure(s) and uses on Lot No. 655 in D.D. 109 which is already subject to lease enforcement actions according to case priority. The lot owner(s) should rectify/apply for regularization on the lease breaches as demanded by LandsD.	Only part of Lot 655 in DD109 (this lot) falls within the Application Site, and no structures are proposed within the application boundary of this lot. The unauthorized structure(s), as mentioned, belong to another use under Planning Application (No. A/YL-KTN/879) within the same lot (see Appendix 3 and 3A), which is not related to this planning application.

Departmental Comments	Responses
<p>2. <u>Unlawful occupation of Government land adjoining the said private lots with unauthorised structure(s) covered by the planning application</u></p> <p>The Government land within the application site (about 875 m² as mentioned in the application form) has been unlawfully occupied with unauthorised structures) without any permission. Any occupation of GL without Government's prior approval is an offence under Cap. 28. LandsD objects to the planning application since there is unlawful occupation of Government Land (GL) and regularization would not be considered according to the prevailing land policy. The lot owner(s) should immediately cease the unlawful occupation of GL and remove the unauthorised structure(s) as demanded by LandsD. This office reserves the rights to take necessary land control action against the unlawful occupation of Government land without further notice.</p> <p>If the planning application is approved, the STW holder(s) will need to apply to this office for modification of the STW conditions where appropriate and the lot owner(s) shall apply to this office for a Short Term Waiver (STW) and Short Term Tenancy (STT) to permit the structure(s) erected within the said private lots and the occupation of the Government land. The applications for STW and STT will be considered by the Government in its capacity as a landlord and there is no guarantee that they will be approved. The STW and STT, if approved, will be subject to such terms and conditions including the payment of waiver fee, rent and administrative fee as considered appropriate by LandsD. Besides, given the proposed use is temporary in nature, only erection of temporary structure(s) will be considered.</p>	<p>The total area of the Application Site is 40,616 square metres, and the Government land accounts for only 2.15% of the total site area. According to the Applicant, some canopies (rooftop structures on private lots) may be encroaching onto the Government land, and this will be rectified upon further clarification with LandsD (see Appendix 4).</p> <p>Noted. Should this application be approved, the Applicant will apply for STW and STT for regularization of the temporary structures erected and the use of Government land.</p>

Appendix 1

The estimated hourly trip generation of the proposed development is as follows:

Weekdays (Mondays to Fridays)

(Operation Hours: 10:00-18:00)

Time	No. of Trips (Visitors)		No. of Trips (Staff)		No. of Trips (Loading/Unloading)
	(In)	(Out)	(In)	(Out)	
09:00-10:00	0	0	3	0	0
10:00-11:00	4	0	0	0	0
11:00-12:00	1	0	0	0	1
12:00-13:00	0	2	0	0	0
13:00-14:00	1	3	0	0	0
14:00-15:00	4	1	0	0	1
15:00-16:00	3	7	0	0	0
16:00-17:00	0	0	0	0	0
17:00-18:00	0	0	0	3	0
Total:	13	13	3	3	2

Weekends and Public Holidays (Saturdays, Sundays, and Public Holidays)

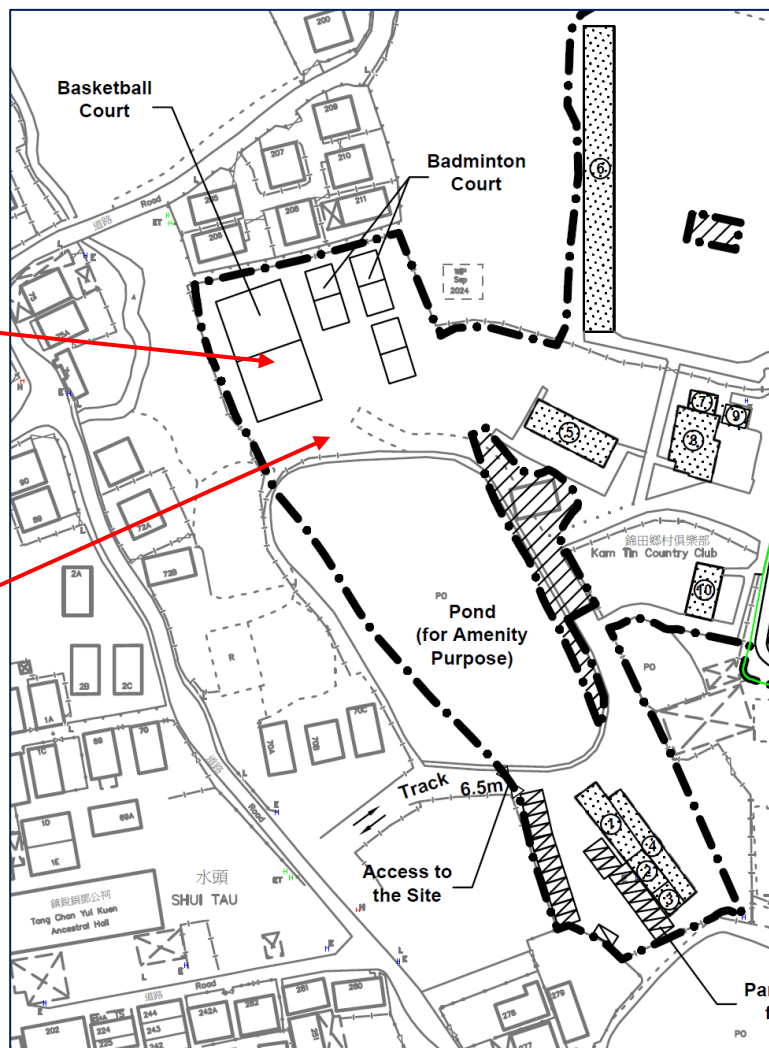
(Operation Hours: 10:00-22:00)

Time	No. of Trips (Visitors)		No. of Trips (Staff)		No. of Trips (Loading/Unloading)
	(In)	(Out)	(In)	(Out)	
09:00-10:00	0	0	3	0	0
10:00-11:00	5	0	0	0	0
11:00-12:00	5	0	0	0	1
12:00-13:00	7	0	0	0	0
13:00-14:00	3	4	0	0	0
14:00-15:00	3	4	2	2	0
15:00-16:00	3	2	0	0	0
16:00-17:00	2	2	0	0	0
17:00-18:00	2	7	0	0	0
18:00-19:00	0	4	0	0	0
19:00- 20:00	0	3	0	0	0
20:00-21:00	0	2	0	0	0
21:00-22:00	0	2	0	3	0
Total:	30	30	5	5	1

Location of the proposed basketball courts:

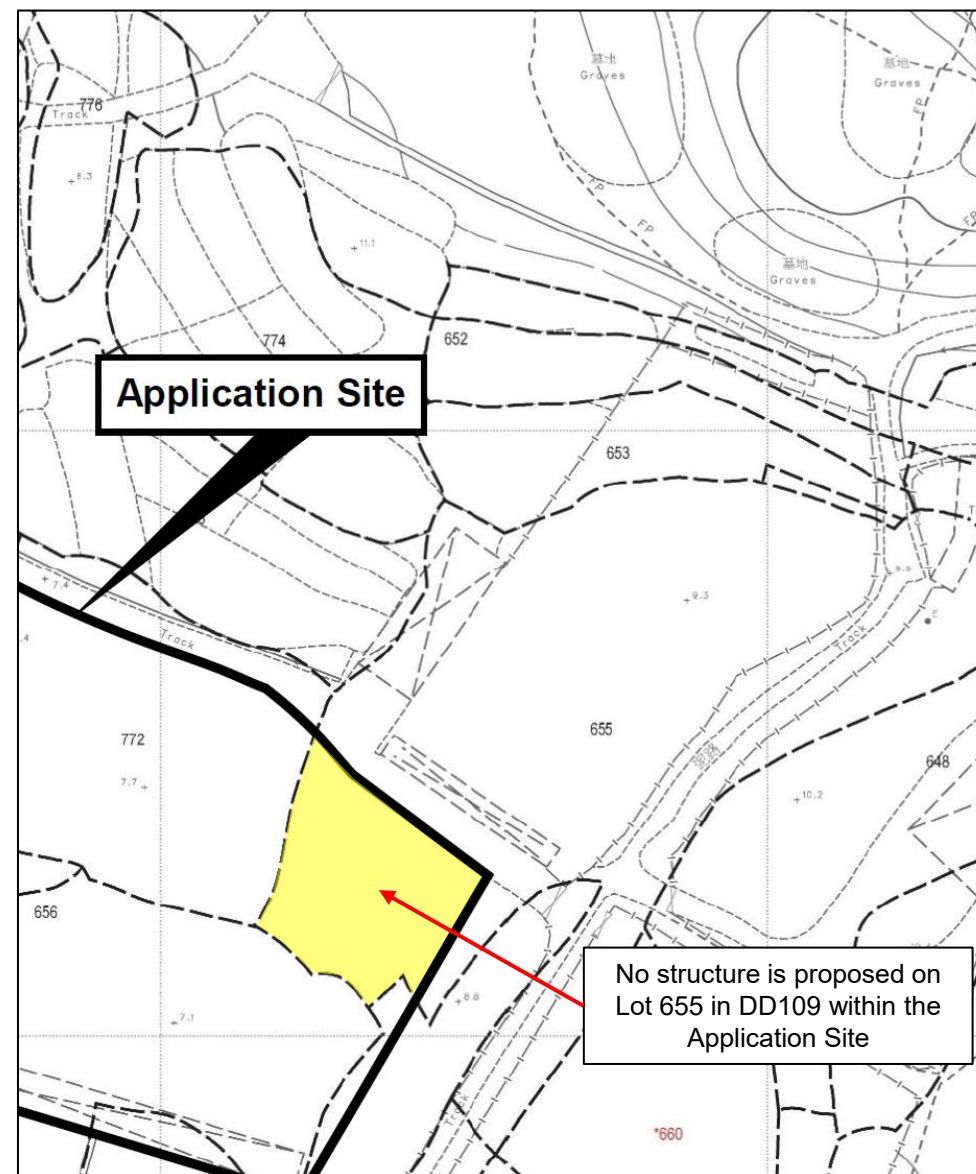
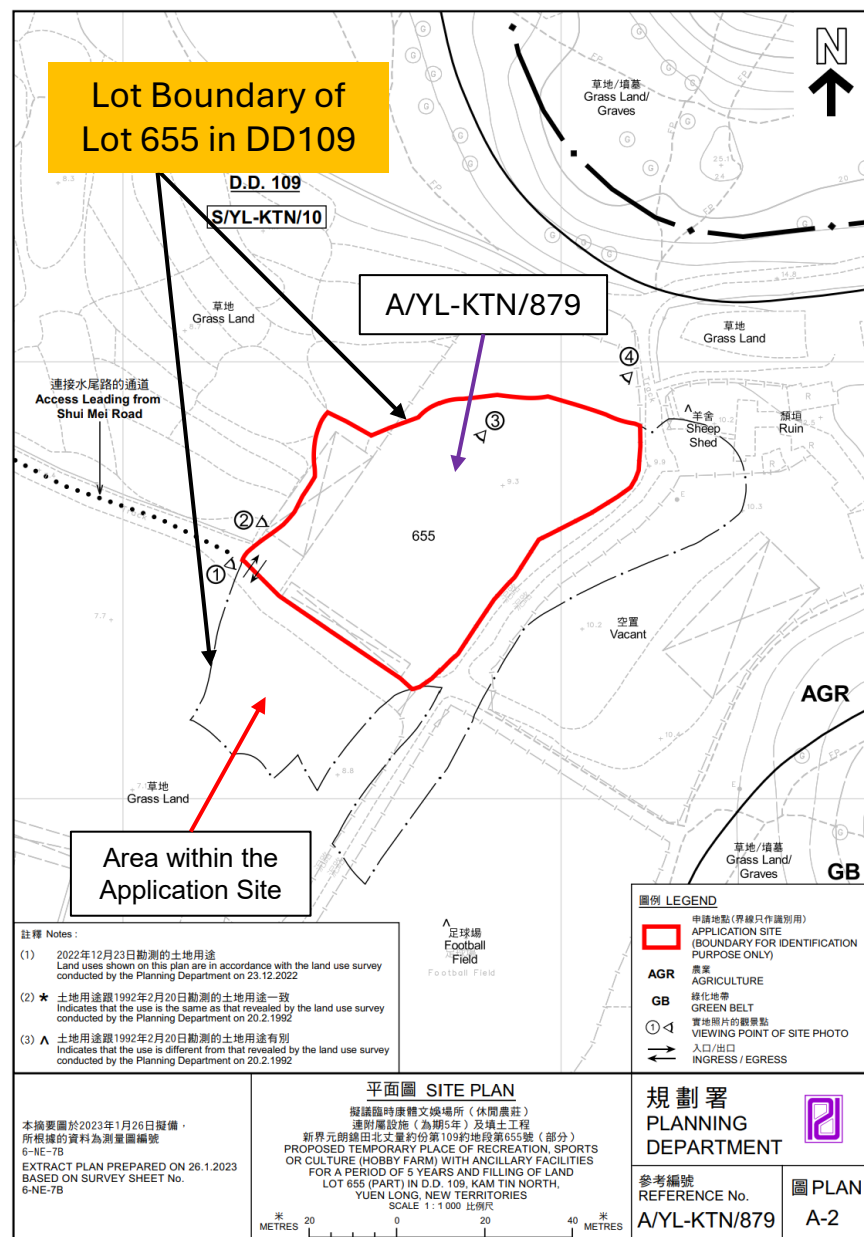


Photos taken by the Applicant on 2.9.2025

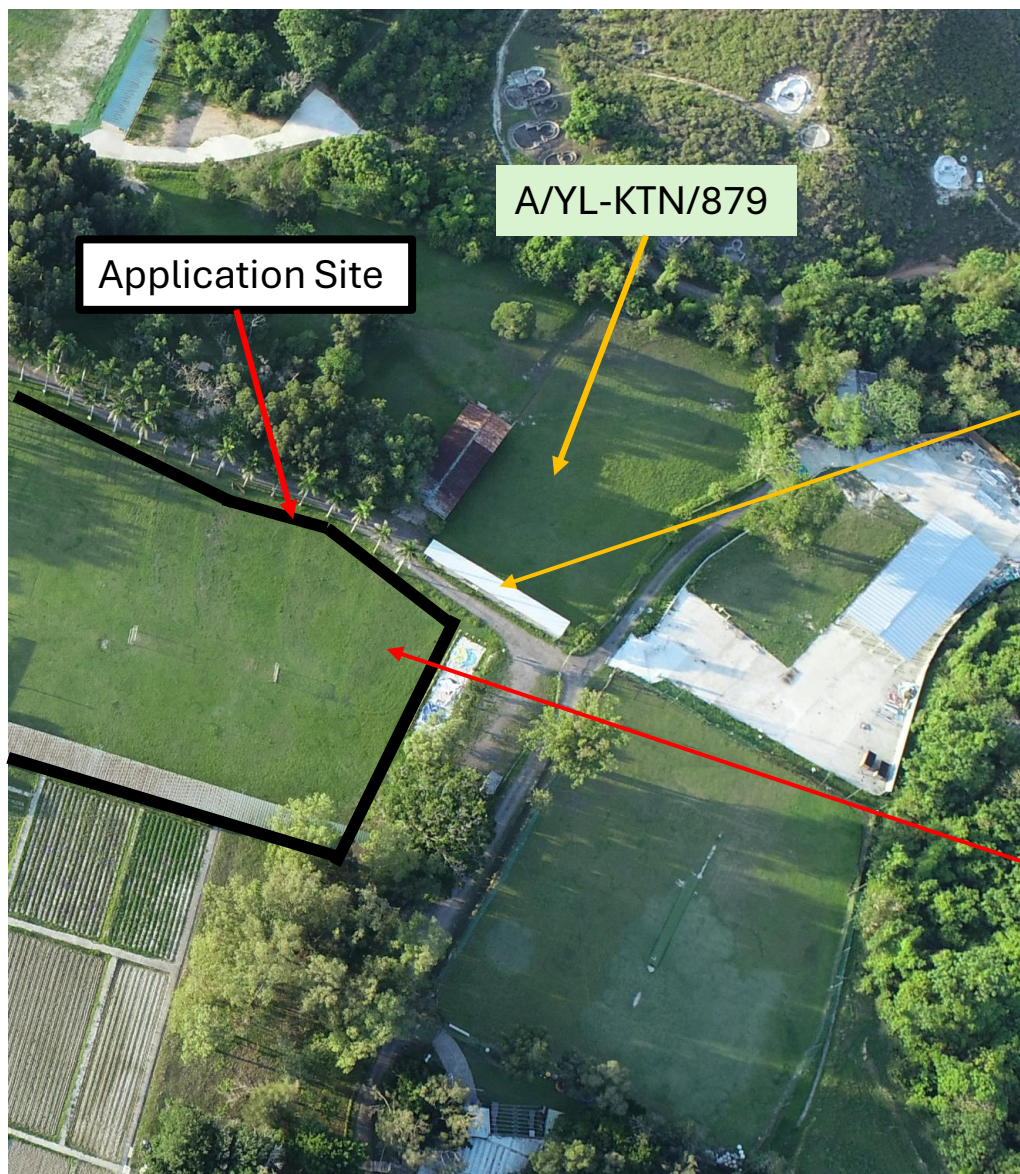


Possible Safety Measures to be installed :





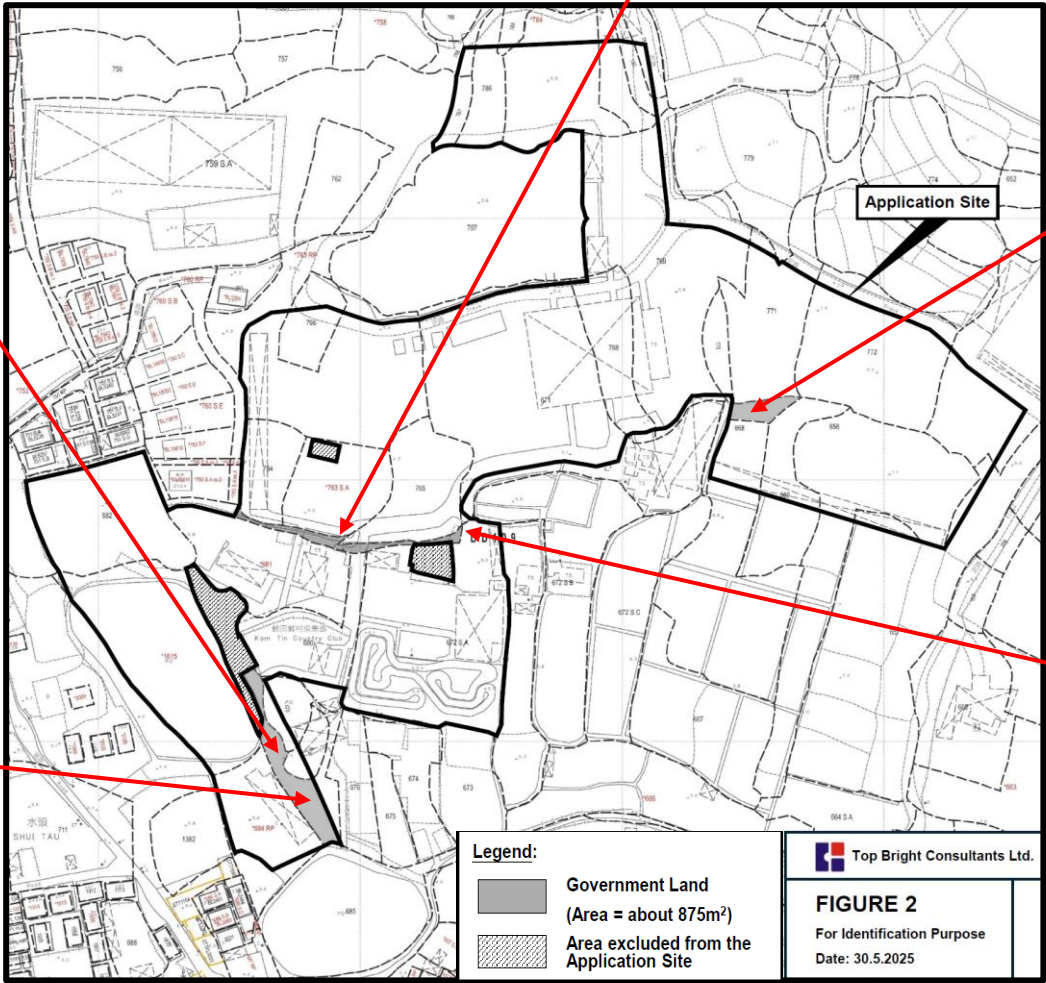
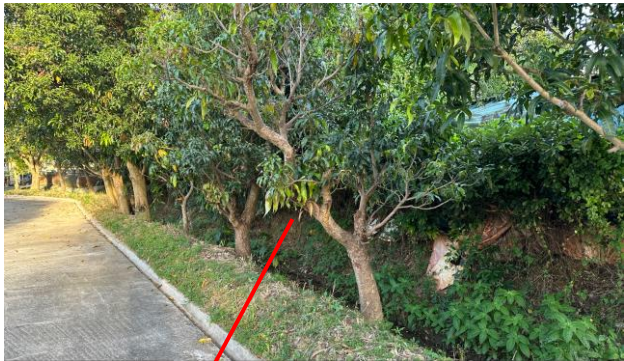
Photos taken by the Applicant on 2.9.2025



Structures at Lot 655 in DD 109 to the north of the Application Site



No structure proposed on Lot 655 in DD109 within the Application Site



Top Bright Consultants Ltd.

FIGURE 2

For Identification Purpose
Date: 30.5.2025