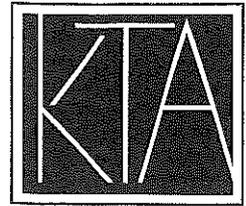


By Email (tpbpd@pland.gov.hk)

Our Ref: S3171/GBASS_TBT/25/006Lg

6 February 2026

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



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Dear Sir / Madam,

**Proposed 'Government Use' (GBA Air Quality Laboratory and
Meteorological Monitoring Supersite and Associated Filling of Land)
in "Green Belt" Zone and Area shown as 'Road',
Government Land in D.D.129, Deep Bay Road, Tsim Bei Tsui,
Yuen Long, New Territories
(Section 16 Planning Application No. A/YL-LFS/592)
- Further Information No. 3 -**

We refer to the captioned S16 Application received by the Town Planning Board ("TPB") on 31 December 2025 and the departmental comment from Tuen Mun and Yuen Long West District Planning Office received on 5 February 2026.

To address the departmental comment, attached please find the response-to-comment table with attachment for consideration.

Should you have any queries in relation to the attached, please do not hesitate to contact the undersigned at [REDACTED].

Yours faithfully
For and on behalf of
KTA PLANNING LIMITED

Camille LAM

A handwritten signature in black ink, appearing to be 'Camille Lam', written over a white background.

Encl.

cc. TMYLW DPO – Mr Wilfred Chu (by email)
the Applicant

KT/PL/CL/vy



FS 579819

Proposed ‘Government Use’ (GBA Air Quality Laboratory and Meteorological Monitoring Supersite) and Filling of Land in “Green Belt” Zone and Area shown as ‘Road’ on Deep Bay Road, Tsim Bei Tsui, New Territories

(S.16 Planning Application No. A/YL-KFS/592)

Comments Forwarded from Tuen Mun and Yuen Long West District Planning Office

Comments	Responses
<p>Comments from Planning Department (received on 5 February 2026) Contact person: Mr. Wilfred CHU; Tel. No.: 2158 6290</p>	
<p>1. Please provide the area covered by the proposed grasscrete paver and clarify further on how it would be implemented and whether it involves any filling of land.</p>	<p>The area covered by the proposed grasscrete paver is about 1,103m².</p> <p>Grasscrete paver is a permeable concrete paving system with cellular and voided structure that allows for vegetation (like grass) or crushed stone to fill the openings, creating a load-bearing surface that combines the strength of concrete with the aesthetics and environmental benefits (i.e. the drainage aspect with reduced runoff) of natural ground cover, used for driveways, car parks, and erosion control.</p> <p>According to Appendix D of BD APP-152 – Sustainable Building Design Guidelines as attached, grasscrete paver is counted as a kind of greening features, instead of hard paved areas. As it is considered as a paving system, it does not involve any filling of land.</p>

Attached: Appendix D of BD APP-152 – Sustainable Building Design Guidelines

Compiled by: KTA

Date: 6 February 2026

File Ref.: 20260206_S3171_FI3_RtC

Site Coverage of Greenery

1. All *greenery areas* should be measured horizontally based on the soil¹ areas as shown on the plan in the following scenarios (see Figure D1):
 - (i) greenery areas are uncovered;
 - (ii) greenery areas in the form of projecting planters² are shadowed vertically by parts of the building or other projecting features, and the clear height of the building or projecting features above the covered area is not less than 8 times the horizontal width of the covered area;
 - (iii) greenery areas in the form of projecting planters² are shadowed vertically by other projecting planters, and both planters comply with the requirements stipulated in paragraph 9 of PNAP APP-19; or
 - (iv) greenery areas in the *primary zone* are shadowed vertically by buildings (including overhangs), and when measured from the 45° projected line taken from the edge of the building, they fall within the area; and they are accessible to the public, visitors or occupiers from the adjoining open areas.
2. A multiplying factor of 2 is applicable in computing the greenery area of a green buffer complying with the requirements stipulated in Appendix C1 of PNAP APP-151, irrespective of whether the specific standard of enhanced greenery provision is adopted.
3. The summation of following greening features may be accepted to contribute not more than 30% of the total required *greenery areas* of the overall provision as specified in Table 2 of this PNAP subject to its location and application of a reduction factor where applicable.

¹ For reference, the recommended minimum soil depths for trees, shrubs, grass/ground covers are 1.2m, 0.6m and 0.3m respectively.

² Greenery areas in the primary zone should be fronting or visible to the public from a street/a public pedestrian way/public open space. Greenery areas above the primary zone should be visible to the public, visitors or occupiers.

Greening Features	Location	Reduction Factor in Computing the Greenery Areas
Covered greenery areas ³ accessible to public, occupiers or visitors from adjoining open space	<i>Primary zone</i> (measured from 45° projected line taken from the edge of building)	50%
Water features ⁴	<i>Primary zone</i> or uncovered communal roof	50%
<i>Grass paving</i>	Except carparking spaces or loading / unloading areas	50%
Planters on an inaccessible roof	Primary zone	50%
<i>Vertical greening</i> ²	No restriction	Nil
Landscape-treated Greening on slopes / retaining structures ⁵ with gradient steeper than 45°	No restriction	Nil

4. Irrigation points/automatic irrigation system and drainage system should be provided at *greenery areas* to facilitate future maintenance. In addition, where greenery is provided on the roof, the roof should be of impervious construction and the design dead load on the roof should also take into account the anticipated loads of the soil, plants, trees, etc.
5. Greenery in removable pots/planters that are not permanently fixed or built into the development should not be counted as greenery area.
6. Covered greenery above the *primary zone* such as in covered communal podium garden or sky garden should not be counted as *greenery area*, except for the scenarios in paragraph 1 above.

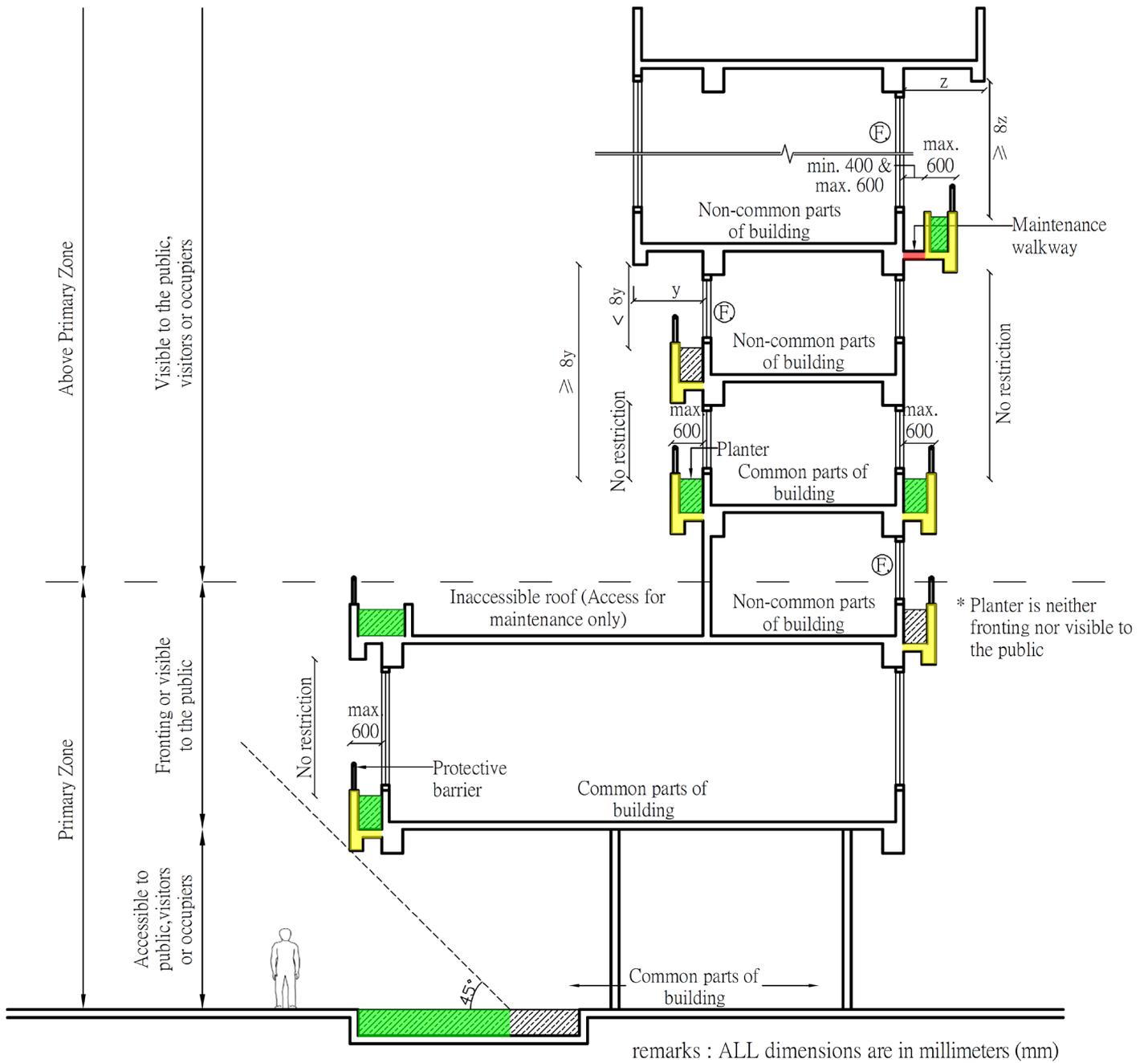
³ When selecting planting design and species for covered greenery, reference should be made to “Proper Planting Practice – Provide Sufficient Growing Space between Trees and Adjacent Buildings / Structures” issued by Greening, Landscape and Tree Management Section of DEVB (www.greening.gov.hk).

⁴ Water features should be measured by the horizontal water surface area. Swimming pool and jacuzzi are not considered as water features. Filtration plant room for water feature may be exempted from GFA but subject to compliance with the pre-requisites and the overall GFA cap on GFA concessions stipulated in PNAP APP-151.

⁵ Greening on slopes/retaining structures should be measured by the projected elevational area of the soil where the greenery will grow. Greening on slopes/retaining structures with gradient equal or less than 45° will be measured horizontally based on the soil area as shown on the plan.

7. *Vertical greening* should be measured by the elevational area of the vegetated panel/modular planter or panel, or the vertical frame (for climbing and/or weeping plants) where the greenery will grow. For *greenery areas* provided by climbing or weeping plants, those part of the vertical frames with a height more than 7.5m are not accountable. The horizontal area of soil in planters under the vertical frame/modular planter/panel already counted for vertical greening as aforesaid should be excluded from the *greenery area* calculation. Self-clinging climbing plants on hard surfaced walls should be measured horizontally based on the soil areas as shown on the plan (not counted as vertical greening).
8. All *greenery areas* for the purpose of this PNAP should be designated as common parts of the building. Access for maintenance and replacement of the plants should be provided from common parts of the building. As for the planters on the inaccessible flat roofs, communal access paths should still be provided from the common areas for maintenance of the planters.
9. Tree planting can provide localized thermal relief in urban environment. Provision of tree cluster is encouraged. Reference could be made to the requirements stipulated in Appendix C1 of PNAP APP-151, irrespective of whether the specific standard of enhanced greenery provision is adopted.
10. When granting modifications under section 42 of the Building Ordinance for GFA concessions applied under PNAP APP-151, the Building Authority (BA) may impose, but not limited to, the following conditions: -
 - (a) The *greenery areas* should not be used for any other purposes without the prior consent of the BA.
 - (b) The restriction on the use as stated in item (a) above and the *greenery areas* to be designated as common parts should be incorporated into the Deed of Mutual Covenant (DMC) with details of their size (in area), locations and the common access thereto clearly indicated on a plan(s). Where no DMC is to be in force, such restriction and designation should be incorporated into the Sales and Purchase Agreement, Assignment or Tenancy Agreement.
 - (c) The letter of undertaking for complying with the requirements as stated in items (a) and (b) above, submitted by the developer or owner in support of the application for GFA concessions should be registered in the Land Registry before applying for the occupation permit.

Measurement of Greenery Area



- ⓕ Fixed window
- Accountable greenery area
- ▨ Not accountable for greenery area
- Exempted from PR & SC calculation and subject to pre-requisites and overall cap (APP-19 para.9)
- Exempted from PR & SC calculation (APP-19 para.9)

Typical Section (not to scale)

Fig. D1 Greenery as per paragraph 1 of this Appendix

(Rev. 9/2023)