



**LCH Planning and Development
Consultants Limited**

Our Ref.: PD2605002/03
Your Ref.: TPB/A/YL-NSW/373

9 October 2026

By Email

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

Dear Sir/Madam,

**APPLICATION NO. A/YL-NSW/373 FOR PERMISSION
UNDER SECTION 16 OF THE TOWN PLANNING ORDINANCE**

FURTHER INFORMATION SUBMISSION

We refer to the comments regarding the captioned application.

Please find attached our responses to departmental comments. This Further Information contains the responses to comments and technical clarification of relevant Government department. Thus, according to TPB Planning Guideline No. 32B, this Further Information does not result in a material change of the nature of the application and should be accepted by the TPB for inclusion into the application.

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

Yours faithfully,
For and on behalf of
LCH Planning & Development Consultants Limited

Junior Ho
Director

Encl.

- Responses to Comments Table
- Supplementary Statement
- Annex 1 Revised Swept Path Analysis
- Annex 3 FSI Proposal
- Annex 4 Proposed Landscape Mitigation Measures

c.c. the Applicant





Section 16 Application for Temporary Warehouse (Excluding Dangerous Goods Godown) with Ancillary Facilities and Associated Filling of Land for a Period of 3 Years at Various Lots in D.D. 104 and Adjoining Government Land, Pok Wai, Yuen Long

Application No. A/YL-NSW/373

Response to Departmental Comments Table

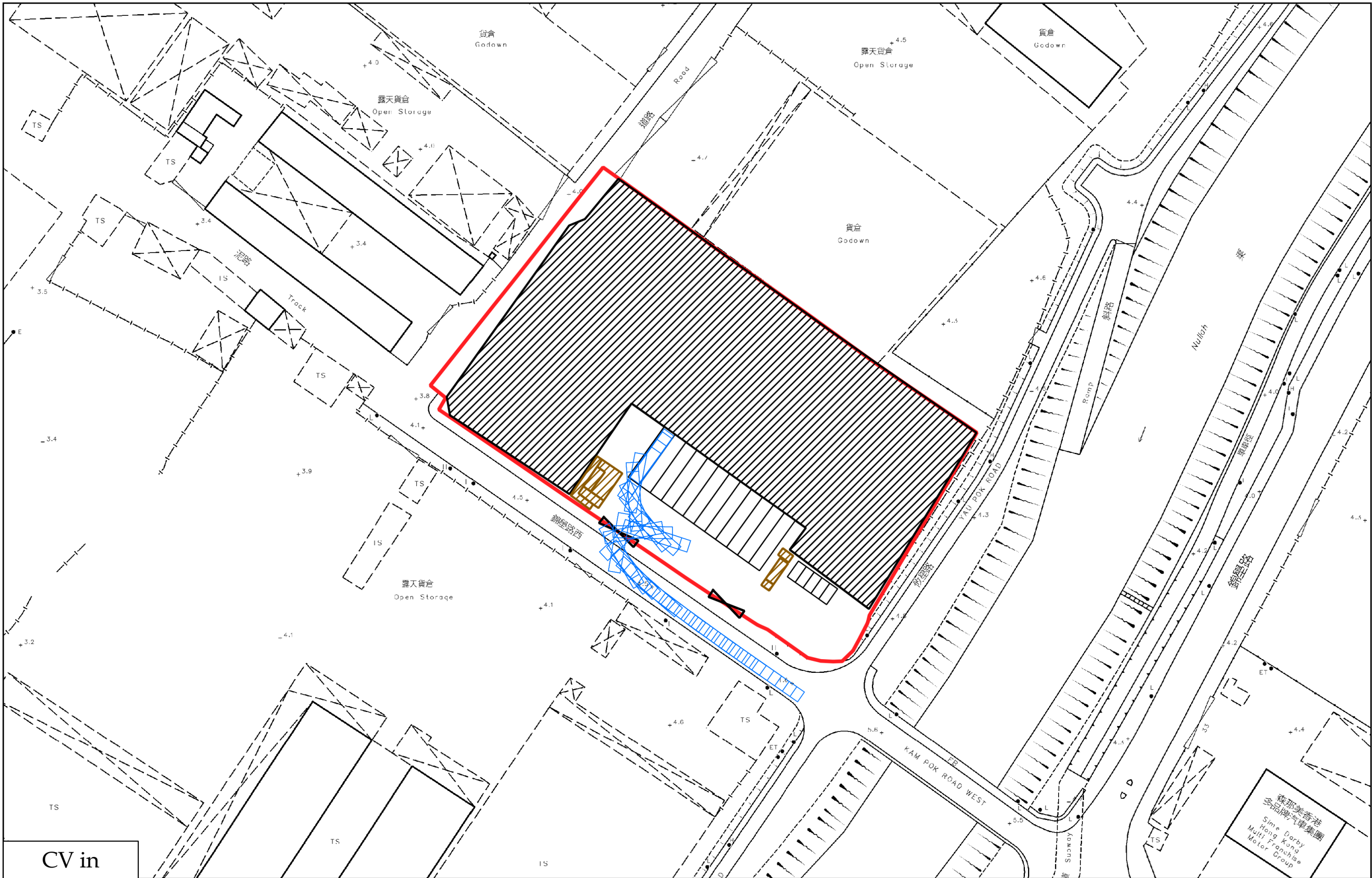
No.	Comments Received	Our Responses
1.	<i>Comments from Environmental Protection Department received dated 11 August 2026 (Subject Officer: Mr. Kelvin WONG, Tel: 2835 1117)</i>	
a	Please clarify whether the proposed use would involve storage of materials of dusty nature (e.g., cement, earth, pulverized fuel ash, aggregates, silt, stonefines, sand, debris, sawdust and wooden chips). If affirmative, whether those materials would be in packaged form.	The proposed use would not involve storage of material of dusty nature.
2.	<i>Comments from Fire Services Department received dated 11 August 2026 (Subject Officer: Mr. YUEN Tsz-fung, Tel: 2733 7781)</i>	
a	Please submit relevant layout plans incorporated with the proposed FSIs to his Department for approval. In addition, the applicant should also be advised as follows: i. The layout plans should be drawn to scale and depicted with dimensions and the nature of occupancy; and	Noted.
b	ii. The location of the proposed FSIs to be installed should be clearly marked on the layout plans.	Noted.
c	If the proposed structures are required to comply with the Buildings Ordinance (Cap. 123), detailed fire safety requirements will be formulated upon receipt of the formal submission of general building plans.	Noted with thanks.



	如果擬建構築物須符合《建築物條例》（第 123 章）的規定，詳細的消防安全要求將在收到正式提交的一般建築圖則後制定。	
3.	<i>Comments from Planning Department received dated 11 August 2026 (Subject Officer: Ms. Mandy KWOK, Tel: 3565 3953)</i>	
a	According to the Applicant's Submission, the applicant stated in Para 3.9.1 of the Planning Statement that "No trees are identified within the current site". However, with reference to DPO's site photos taken on 23.7.2026 and her Site inspection on 29.7.2026, some trees were found at the northwestern and southeastern of the Site. With the reference to Figure 3 and 7 (Land Status Plan and Proposed Land Filling Plan), the southeastern portion of the Site (mainly government land) was proposed to be filled and existing trees would be affected.	The southeastern portion of the Site is Government land, resumed in 1999 and remaining vacant and unused since. Existing trees in this area are generally small, immature and naturally regenerated, and by their observed size, condition and form have limited amenity and landscape value. It is acknowledged that the proposed land-filling may affect some of these trees on Government land. All trees on the private lot lie outside the site boundary. Any tree-felling would only be confined to Government land. The vegetation within the concerned government land is mainly of grasses and self-sown shrubs/trees of low arboricultural value, and does not include registered Old and Valuable Trees or trees designated for preservation under the lease. Where practicable, trees outside the essential works area will be retained and protected during construction and operation. For trees that cannot reasonably be retained, appropriate mitigation measures, including compensatory planting of 3 trees and landscape enhancement within the Site, will be implemented. Please refer to Annex 3.
4.	<i>Comments from Transport Department received dated 2 September 2026 (Subject Officer: Mr. Vincent LAI, Tel: 3855 6515)</i>	
a	Please estimate the total traffic flow at peak hour (in pcu/hr) arising from the development (i.e traffic flow generated from original use + additional traffic flow arising from increasing the height of the warehouse);	The breakdown of estimated trip generation and attraction for the proposed development during the AM and PM peak hours, both before and after, is provided below:



		Existing <table><tr><th rowspan="3">Time Period</th><th colspan="4">Trip Generation/Attraction</th><th rowspan="3">2-Way Total</th></tr><tr><th colspan="2">Private Car</th><th colspan="2">Container Vehicle</th></tr><tr><th>In</th><th>Out</th><th>In</th><th>Out</th></tr><tr><td>Trips at AM peak per hour (08:00 – 09:00)</td><td>3</td><td>0</td><td>12</td><td>0</td><td>15</td></tr><tr><td>Trips at PM peak per hour (17:00 – 18:00)</td><td>0</td><td>3</td><td>0</td><td>12</td><td>15</td></tr></table> With Proposed Development <table><tr><th rowspan="3">Time Period</th><th colspan="4">Trip Generation/Attraction</th><th rowspan="3">2-Way Total</th></tr><tr><th colspan="2">Private Car</th><th colspan="2">Container Vehicle</th></tr><tr><th>In</th><th>Out</th><th>In</th><th>Out</th></tr><tr><td>Trips at AM peak per hour (08:00 – 09:00)</td><td>5 (+2)</td><td>0</td><td>24 (+12)</td><td>0</td><td>29 (+14)</td></tr><tr><td>Trips at PM peak per hour (17:00 – 18:00)</td><td>0</td><td>5 (+2)</td><td>0</td><td>24 (+12)</td><td>29 (+14)</td></tr></table> The traffic impact is anticipated not to be material.	Time Period	Trip Generation/Attraction				2-Way Total	Private Car		Container Vehicle		In	Out	In	Out	Trips at AM peak per hour (08:00 – 09:00)	3	0	12	0	15	Trips at PM peak per hour (17:00 – 18:00)	0	3	0	12	15	Time Period	Trip Generation/Attraction				2-Way Total	Private Car		Container Vehicle		In	Out	In	Out	Trips at AM peak per hour (08:00 – 09:00)	5 (+2)	0	24 (+12)	0	29 (+14)	Trips at PM peak per hour (17:00 – 18:00)	0	5 (+2)	0	24 (+12)	29 (+14)
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	For Annex 1 - It is noted that the swept path encroaches upon the footpath of Kam Pok Road East. Please review; and	The swept path analysis has been revised accordingly. Please refer to Annex 1 .																																																				
	For Annex 2 - Please clarify whether the 9.7m wide ingress/egress will be used by 16m long container vehicle. If affirmative, please supplement the swept path analysis.	The 9.7m wide ingress/egress will be solely used by private vehicle but not the 16m long container vehicle.																																																				



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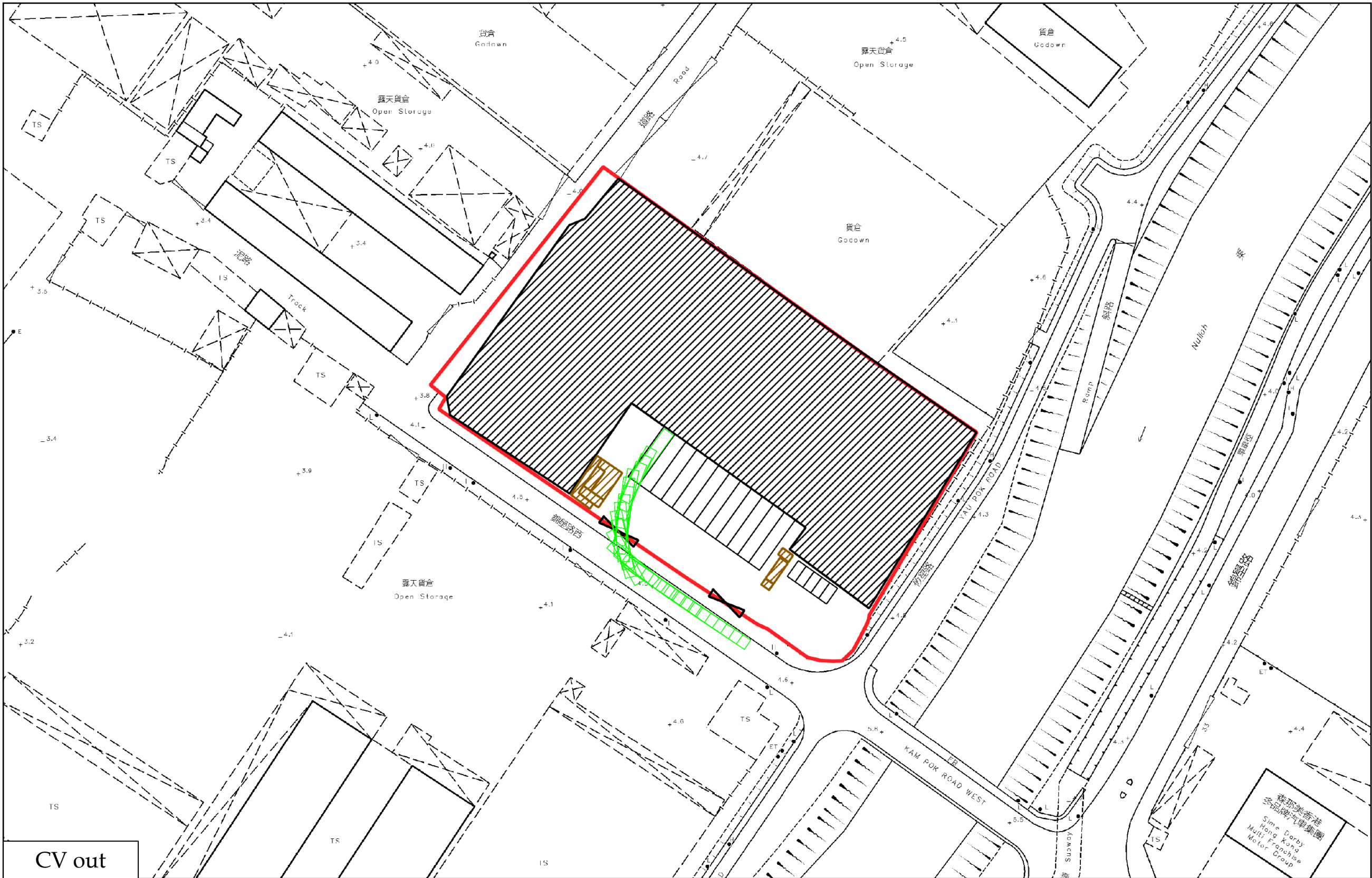


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Annex 1 : Swept Path Analysis

Temporary Warehouse (Excluding Dangerous Goods Godown) with Ancillary Facilities and Associated Filling of Land for a Period of 3 Years at Lot Nos. 3719 S.J ss.1 S.A RP, 3719 S.J ss.2 RP, 3719 S.J ss.4 RP, 3719 S.J RP, 3719 S.Q ss.1 S.C RP in D.D. 104 and Adjoining Government Land, Pok Wai, Yuen Long, N.T.

(Source: HK GEODATA STORE, HKSAR Government)

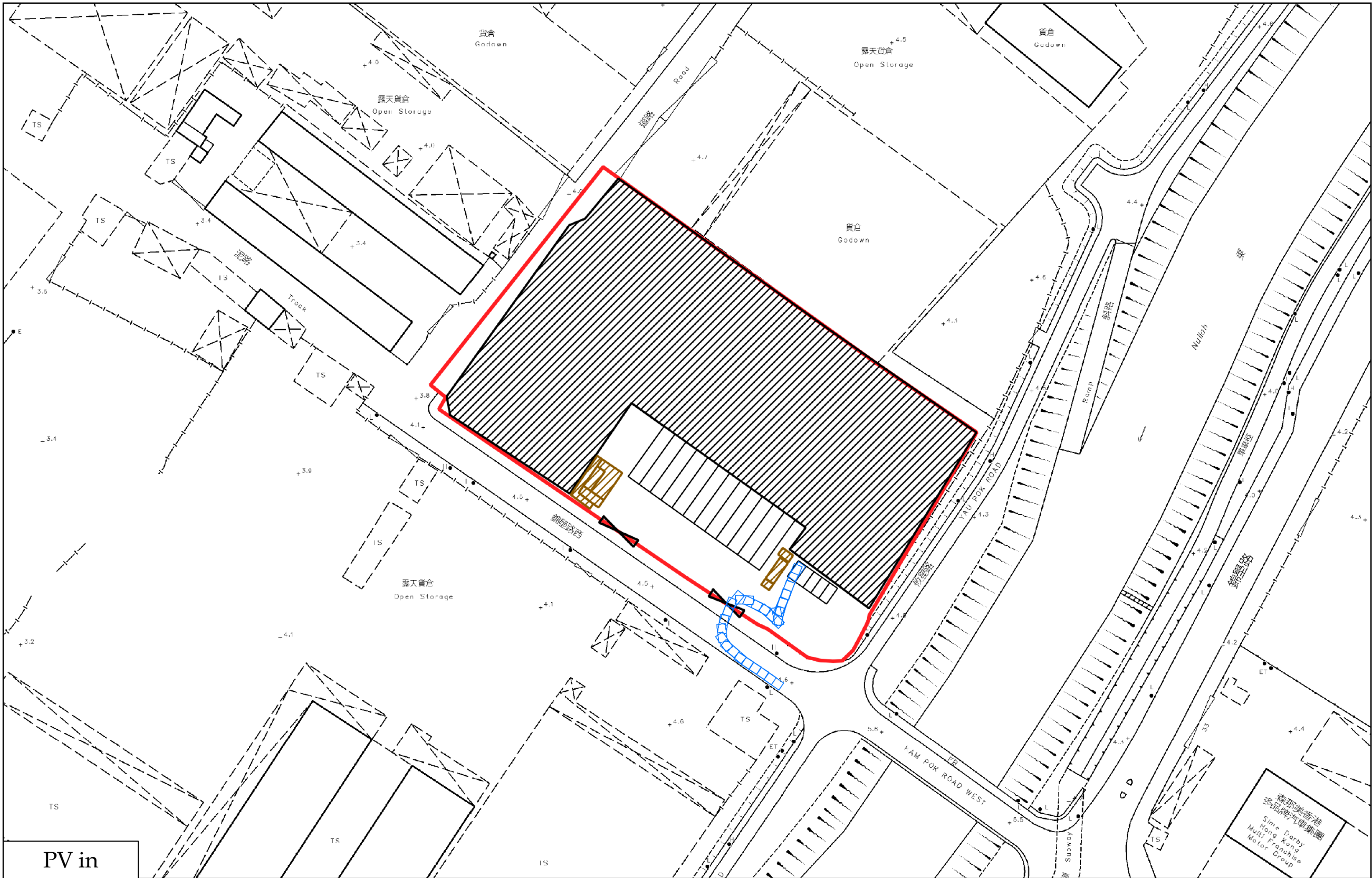


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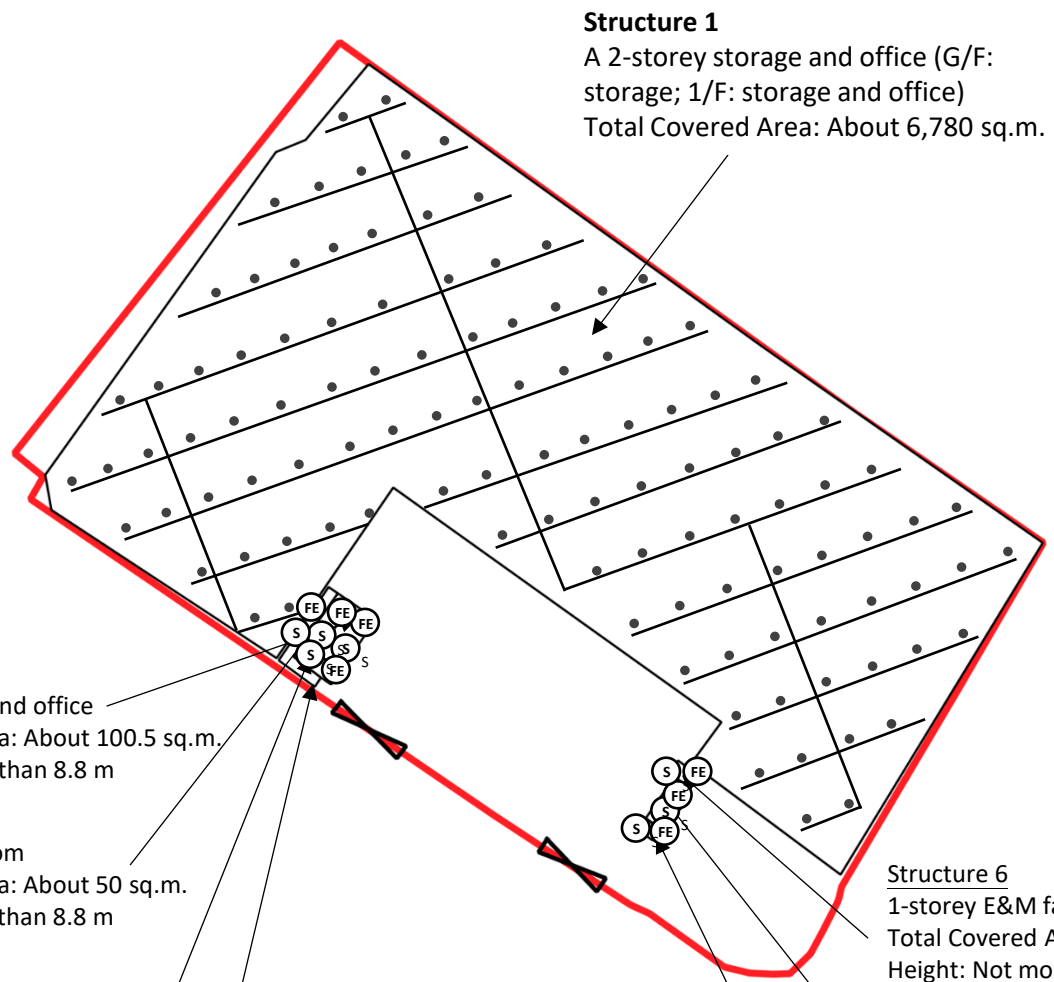


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(Source: HK GEODATA STORE, HKSAR Government)



Structure 1
A 2-storey storage and office (G/F: storage; 1/F: storage and office)
Total Covered Area: About 6,780 sq.m.

Structure 2
1-storey storage and office
Total Covered Area: About 100.5 sq.m.
Height: Not more than 8.8 m

Structure 3
1-storey utility room
Total Covered Area: About 50 sq.m.
Height: Not more than 8.8 m

Structure 4
1-storey storage
Total Covered Area: About 50 sq.m.
Height: Not more than 8.8 m

Structure 5
1-storey storage and maintenance room
Total Covered Area: About 80 sq.m.
Height: Not more than 8.8 m

Structure 6
1-storey E&M facility
Total Covered Area: About 7 sq.m.
Height: Not more than 8.8 m

Structure 7
1-storey toilet
Total Covered Area: About 15 sq.m.
Height: Not more than 8.8 m

Structure 8
1-storey security cabin
Total Covered Area: About 4 sq.m.
Height: Not more than 8.8 m

FIRE SERVICES NOTES:

1. GENERAL
1.1 THE APPLICATION SITE HAS AN AREA OF APPROXIMATELY 9,280 SQ. M. AND IS CURRENTLY USED FOR WAREHOUSE PURPOSES. THE SITE COMPRISES EIGHT STRUCTURES, INCLUDING A TWO-STOREY MAIN WAREHOUSE WITH A TOTAL GFA OF ABOUT 13,866.5 M² AND SEVEN ANCILLARY STRUCTURES, EACH WITH A GFA OF LESS THAN 230 M²
1.2 ALL OPEN STORAGE AREAS, CIRCULATION SPACES, FIRE SERVICE ACCESS, EMERGENCY ACCESS ROUTES, FIRE EXTINGUISHERS, SOLAR PV EQUIPMENT, INVERTERS AND ELECTRICAL ISOLATION POINTS SHALL BE KEPT CLEAR AND UNOBSTRUCTED AT ALL TIMES
1.3 FOR ENCLOSED STRUCTURE WITH GROSS FLOOR AREA NOT EXCEEDING 230 M², PORTABLE FIRE EXTINGUISHER AND STAND-ALONE FIRE DETECTOR SHALL BE PROVIDED
1.4 THE EXISTING WATER TANK NEAR THE SITE EXIT SHALL BE MAINTAINED ACCESSIBLE AND UNOBSTRUCTED. ITS ADEQUACY FOR THE PROPOSED DEVELOPMENT SHALL BE SUBJECT TO VERIFICATION AGAINST THE APPLICABLE FSD REQUIREMENTS
1.5 STRUCTURES WITHIN THE APPLICATION SITE THAT ARE LESS THAN 1.8 M APART SHALL BE REGARDED AS ADJOINING STRUCTURES, AND THEIR GFAS SHALL BE JOINTLY CALCULATED FOR THE ASSESSMENT OF FIRE SAFETY REQUIREMENTS
1.6 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. [SEP 2022]

2. FIRE EXTINGUISHER
2.1 FOR OPEN STORAGE AREAS OR SHEDS THAT ARE OPEN ON TWO OR MORE SIDES AND HAVE A GROSS FLOOR AREA NOT EXCEEDING 230 M², APPROPRIATE PORTABLE FIRE EXTINGUISHERS SHALL BE PROVIDED IN LOCATIONS WHERE EASILY ACCESSIBLE BY PERSON IN CHARGE WHERE THE NO. OF F.E. SHALL BE PROVIDED. ACCORDING TO THE FORMULA = [STORAGE AREA] (M²) X [0.003]
2.2 THE TYPE AND CAPACITY OF THE PORTABLE FIRE EXTINGUISHERS SHALL BE SUITABLE FOR THE NATURE OF STORAGE AND SHALL BE PROVIDED AT LOCATIONS WHERE THEY ARE READILY ACCESSIBLE BY THE PERSON IN CHARGE OF THE SITE

3. STAND-ALONE FIRE DETECTOR
3.1 STAND-ALONE SMOKE DETECTOR SHALL BE PROVIDED IN ACCORDANCE WITH THE "STAND-ALONE FIRE DETECTOR GENERAL GUIDELINES ON PURCHASE, INSTALLATION & MAINTENANCE [SEPTEMBER 2021].
3.2 ALL DETECTORS SHALL BE INTERCONNECTED SUCH THAT WHEN ONE OF THE DETECTORS IS TRIGGERED, ALL CONNECTED DETECTORS SHALL SOUND AN ALARM SIMULTANEOUSLY

4. AUTOMATIC SPRINKLER SYSTEM
4.1 A SPRINKLER SYSTEM SHALL BE PROVIDED IN ENCLOSED STRUCTURES EXCEEDING 230 M² IN GFA IN ACCORDANCE WITH THE APPLICABLE HKFSD REQUIREMENTS AND RELEVANT STANDARDS
4.2 AN AUTOMATIC SPRINKLER SYSTEM SHALL BE PROVIDED AND INSTALLED IN ACCORDANCE WITH THE LPC RULES FOR AUTOMATIC SPRINKLER INSTALLATIONS INCORPORATING BS EN 12845:2015, TOGETHER WITH THE RELEVANT TECHNICAL BULLETINS, NOTES, COMMENTARY AND RECOMMENDATIONS, AND FSD CIRCULAR LETTER NO. 5/2020, AS APPLICABLE. THE SPRINKLER PROTECTION SHALL BE DESIGNED TO ORDINARY HAZARD GROUP III

5. EMERGENCY LIGHTING AND EXIT SIGN
5.1 EMERGENCY LIGHTING AND DIRECTIONAL AND EXIT SIGNS SHALL BE PROVIDED IN ENCLOSED STRUCTURES EXCEEDING 230 M² IN GFA IN ACCORDANCE WITH THE APPLICABLE FSD REQUIREMENTS
5.2 SUFFICIENT EMERGENCY LIGHTING SHALL BE PROVIDED THROUGHOUT THE APPLICATION SITE IN ACCORDANCE WITH BS 5266-1:2016, BS EN 1838:2013 AND FSD CIRCULAR LETTER NO. 4/2021
5.3 SUFFICIENT EXIT SIGN/DIRECTION SHALL BE PROVIDED IN ENCLOSED STRUCTURES EXCEEDING 230 M² IN ACCORDANCE WITH BS 5266-1:2016 AND FSD CIRCULAR LETTER NO. 5/2008

6. MISCELLANEOUS F.S. INSTALLATION
6.1 AN EMERGENCY DISCONNECTION TO ELECTRICITY, SUCH AS MANUAL EMERGENCY SHUT-OFF SYSTEM, SHALL BE PROVIDED
6.2 NO DANGEROUS GOODS WILL BE STORED AT ALL STRUCTURES

FE

S_s

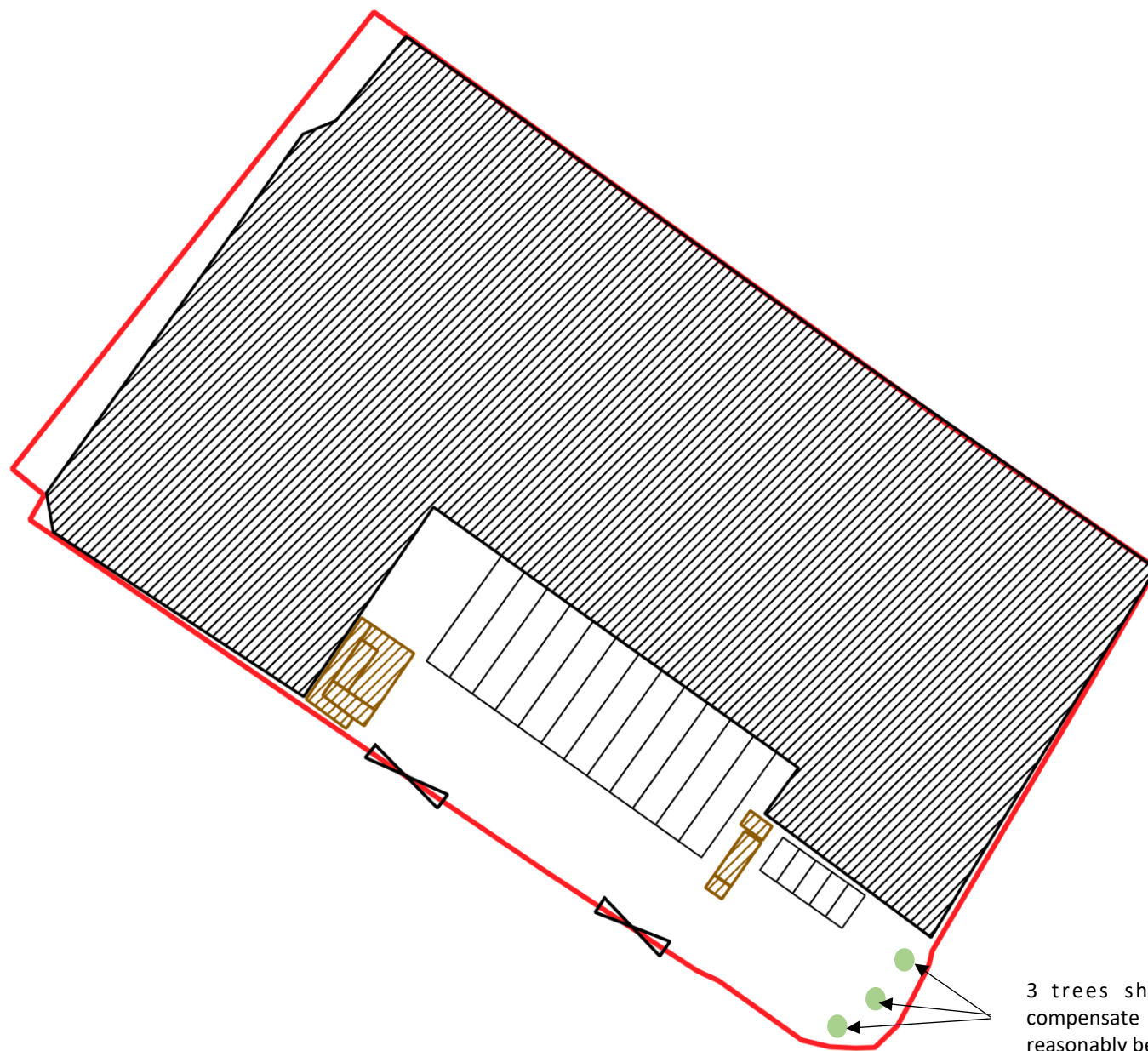
Application Site (Area: about 844 sq.m)

Solar Panels

Proposed planting area

Proposed Fire Extinguisher
(i.e. 20 kg dry chemical fire extinguisher)

Stand-alone Smoke Detector
(i.e. 220V with battery backup)



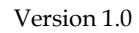
3 trees shall be planted to
compensate for those that cannot
reasonably be retained



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Annex 4 : Landscape Mitigation Measures

Temporary Warehouse (Excluding Dangerous Goods Godown) with Ancillary Facilities and Associated Filling of Land for a Period of 3 Years at Lot Nos. 3719 S.J ss.1 S.A RP, 3719 S.J ss.2 RP, 3719 S.J ss.4 RP, 3719 S.J RP, 3719 S.Q ss.1 S.C RP in D.D. 104 and Adjoining Government Land, Pok Wai, Yuen Long, N.T.



September 2026



Supplementary Statement

1.1 The Application

- 1.1.1 The applicant seeks planning permission from the Town Planning Board (“**Board**”) under Section 16 of the Town Planning Ordinance (“**the Ordinance**”) for temporary warehouse/ storage with ancillary facilities and associated filling of land situated at Lot Nos. 3719 S.J ss.1 S.A RP, 3719 S.J ss.2 RP, 3719 S.J ss.4 RP, 3719 S.J RP and 3719 S.Q ss.1 S.C RP in D.D. 104 and adjoining Government land, Pok Wai, Yuen Long, New Territories (“**Site**”) for a period of 3 years (“**Proposed Development**”).
- 1.1.2 The Site falls within an area of “Other Specified Uses” annotated “Comprehensive Development to include Wetland Restoration Area” (“**OU(CDWRA)**”) zone on the Approved Nam Sang Wai Outline Zoning Plan No. S/YL-NSW/12 (“**the OZP**”).
- 1.1.3 The existing warehouse/storage use is deemed permissible and does not require any planning approvals from the Board under the Town Planning Ordinance (“**TPO**”) as the current use exists prior to the first publication of the Nam Sang Wai Interim Development Permission Area Plan No. IDPA/YL-NSW/1 on 17 August 1990. There has been no substantial change in the intended use and development of the Site, which remains for warehouse/ storage purposes.
- 1.1.4 The subject Government land was previously resumed from the land owner and has remained vacant after completion of related government works. Its incorporation would provide better use of carparking spaces to manoeuvre within the Site for ingress and egress, thereby improving the overall internal circulation. No structure would be enacted on the subject Government land.
- 1.1.5 Hence, **while the current warehouse/ storage use at the Site is regarded as an existing use, planning permission is required for (i) the proposed use onto the small adjoining Government land, and (ii) the proposed increase in structural height.**
- 1.1.6 The Proposed Development in this application has been carefully considered with reference to the development parameters of recently approved planning applications involving similar uses in the surrounding area. The comparison demonstrates that the proposed development is not excessive in terms of site area, gross floor area (“**GFA**”) or plot ratio (“**PR**”), and that the provision of additional ancillary space is reasonable and necessary to support the intended use and its associated logistics operations

	Site Area(sq.m)	GFA(sq.m)	Plot Ratio (about)
Current Planning Application	9,280	13,866.5	1.49
A/YL-NSW/334 (approved on 11/04/2025)	11,770	13,298	1.1
A/YL-NSW/342 (approved on 23/05/2025)	16,483	25,394	1.5
A/YL-NSW/343 (approved on 02/05/2025)	12,980	19,974	1.5
A/YL-NSW/344 (approved on 02/05/2025)	15,878	21,143	1.3
A/YL-NSW/337 (approved on 15/08/2025)	7,736	10,931	1.4
A/YL-NSW/367 (approved on 22/05/2026)	7,736	10,931	1.4
Average:	11,695	16,505.36	1.384286

Table 1. Comparison of Development Parameter of Similar Application in the Surrounding

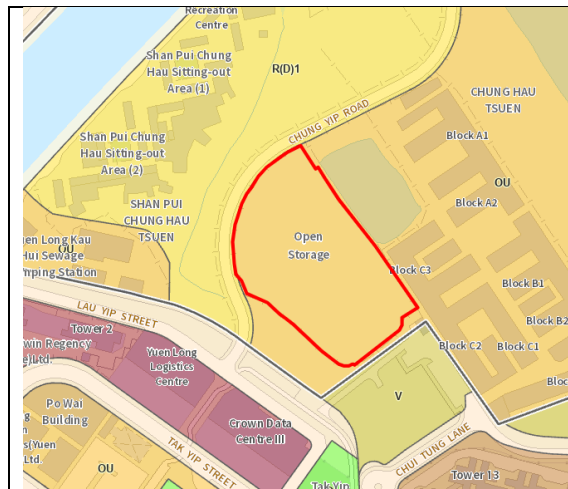


Figure 1. Location of A/YL-NSW/334

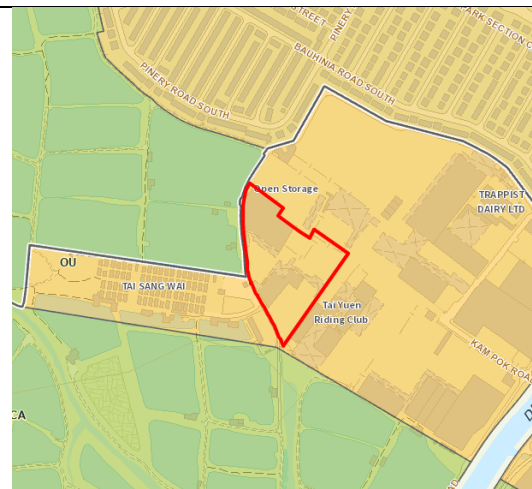


Figure 2. Location of A/YL-NSW/342

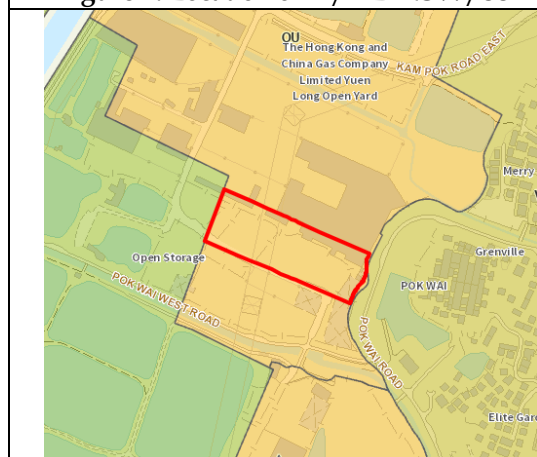


Figure 3. Location of A/YL-NSW/343

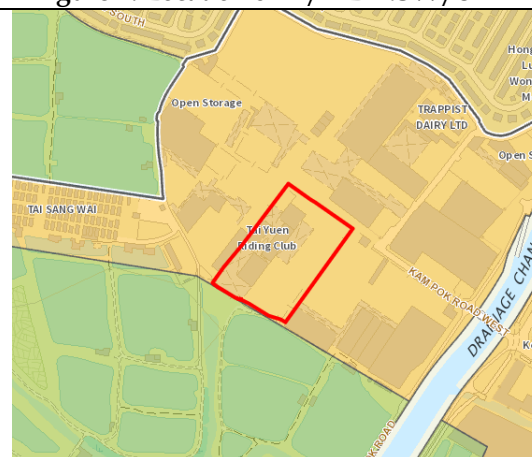


Figure 4. Location of A/YL-NSW/344



Figure 5. Location of A/YL-NSW/337 and A/YL-NSW/367

1.2 Comparison of Site Area, GFA, Plot Ratio and Surrounding Compatibility

- 1.2.1 According to **Table 1 and Figures 1-5**, the proposed site area is similar to, or even smaller than, that of recently approved Section 16 applications involving similar uses. The proposed site area should therefore be considered reasonable having regard to the scale and operational requirements of comparable approved developments in the locality.
- 1.2.2 The proposed GFA is substantially lower than that of similar approved applications in the surrounding area. This demonstrates that the proposal is not seeking to maximise the development intensity of the site. Instead, an appropriate proportion of the site is retained for ancillary and operational purposes, which are important to the effective functioning of the proposed use.
- 1.2.3 The proposed PR is similar to, or lower than, that of comparable approved applications. The proposed development intensity is therefore broadly consistent with the established planning context of the surrounding area. The relatively modest PR also indicates that the additional space sought is not intended to create an overly intensive development, but rather to accommodate the practical operational requirements associated with the applied use.

1.3 Precedent of Recently Approved Applications

- 1.3.1 Recently approved applications, in particular A/YL-NSW/337 and A/YL-NSW/367, provide relevant precedents demonstrating that a reasonable amount of ancillary space is necessary for developments of similar scale and intensity. These applications indicate that the operational requirements of the applied use extend beyond the provision of the principal accommodation and include supporting areas for storage, circulation, manoeuvring, loading/unloading and other associated logistics activities.
- 1.3.2 The provision of such ancillary space is therefore an integral part of ensuring that the proposed use can operate efficiently and safely within the site.

1.4 Relevant Consideration of A/YL-NSW/344

- 1.4.1 The planning circumstances of A/YL-NSW/344 also demonstrate the importance of providing sufficient ancillary space to support the operation of similar uses. In that application, the proposed site area was approximately 15,878 sq.m, which was 5,828 sq.m, or about 58 percent, larger than the affected premises of approximately 10,050 sq.m. The additional area was considered necessary to meet the demand for indoor storage and to provide sufficient space for storage, manoeuvring and goods packaging.
- 1.4.2 The aforementioned precedents show that additional site area beyond the main operational premises can be justified where it is needed to meet the practical requirements of the proposed use. Similar planning considerations are applicable to the Proposed Development, particularly in view of the

growing demand for the applied use and the need to provide adequate space
for its associated logistics operations.