

Date : 10 November 2025
Our Ref. : PPCL/PLG/10190/L004

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

Attention: The Secretary of the Town Planning Board

By Email and Hand

Dear Sir/Madam,

Planning Application No. A/YL-TYST/1338

Section 16 Application for Proposed Temporary Industrial Uses (Manufacturing, Store and Use of Inert Gases and Fire Suppression Agents, Servicing and Filling of Fire Extinguishers and Compressed Gas Cylinders with Inert Gases and Fire Suppression Agents and Hydraulic Pressure Testing); Class 2 Dangerous Goods Godown (Storage of Idle Fire Extinguishers and Gas Cylinders); Workshop, Ancillary Services and Parking of Vehicles for a Period of Three Years in “Industrial” and “Other Specified Uses (Petrol Filling Station)” Zone, Lot 1945 RP in DD121 and Adjoining Government Land, Tong Yan San Tsuen, Yuen Long, New Territories

Submission of Further Information 1

We refer to the departmental comments received via the Tuen Mun and Yuen Long West District Planning Office (“DPO”) in respect of the captioned application and hereby submit 4 hardcopies of Further Information (“FI”) for the Town Planning Board’s consideration.

Please find appended the following documents for your onward processing:

- Responses to Departmental Comments
- **Annex 1** – Revised Traffic Study Report

In response to the comments from the DPO regarding the applied uses for the application, we would like to clarify that the proposed workshop and ancillary services under the application title should be subsumed under the applied ‘Industrial’ use. The proposed parking of vehicles is also an ancillary facility to the ‘Industrial’ use and the dangerous goods godown. Therefore, the application title shall be simplified as follows and the following title shall be used from now on:

Proposed Temporary Industrial Uses (Manufacturing, Store and Use of Inert Gases and Fire Suppression Agents, Servicing and Filling of Fire Extinguishers and Compressed Gas Cylinders with Inert Gases and Fire Suppression Agents and Hydraulic Pressure Testing) and Class 2 Dangerous Goods Godown (Storage of Idle Fire Extinguishers and Gas Cylinders) for a Period of Three Years in “Industrial” and “Other Specified Uses (Petrol Filling Station)” Zone, Lot 1945 RP in DD121 and Adjoining Government Land, Tong Yan San Tsuen, Yuen Long, New Territories.

The above submissions do not result in a material change of the nature of the captioned application. Thus, this SI should be accepted by the Secretary of the Town Planning Board for inclusion and be processed as part of the application, in accordance with the relevant provisions of the Town Planning Ordinance.

Should you have any queries, please do not hesitate to contact the undersigned at 

Yours faithfully,
For and on behalf of
PlanPlus Consultancy Limited

p.p. *Natalie*

Kennith Chan
Managing Director

Encl. As above
c.c. - The Applicant – by email
- Mr. Edwin Yeung (Town Plnr/Yuen Long W 2)



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CONSULTANCY 雋問

**Section 16 Application for Proposed Temporary Industrial Uses
(Manufacturing, Store and Use of Inert Gases and Fire Suppression
Agents, Servicing and Filling of Fire Extinguishers and Compressed Gas
Cylinders with Inert Gases and Fire Suppression Agents and Hydraulic
Pressure Testing) and Class 2 Dangerous Goods Godown
(Storage of Idle Fire Extinguishers and Gas Cylinders)
for a Period of Three Years in “Industrial” and
“Other Specified Uses (Petrol Filling Station)” Zone,
Lot 1945 RP in DD121 and Adjoining Government Land,
Tong Yan San Tsuen, Yuen Long, New Territories**

Planning Application No. A/YL-TYST/1338

Further Information 1

November 2025

Reference : PPC-PLG-10190

Responses to Departmental Comments

Item	Departmental Comments	Applicant's Responses
1. Comments from the Commissioner for Transport received on 4.11.2025		
1.	Please indicate the location of access for pedestrian.	The proposed access for the pedestrian (Workers / Staff) is shown on the drawing no.: J03008-003-002A at Annex 1 revised Traffic Study Report.
2.	There is existing lamp post located near to / at the proposed run-in/out area, which may obstruct the vehicles going to/from the proposed site. Please review.	Following approval of the captioned planning application by the Town Planning Board, detailed design submissions for the proposed run-in/out and the relocation of lamp post No. H4118 will be submitted to the District Office of the Highways Department and the Lighting Division for their respective approvals. Upon obtaining these approvals, the existing lamp post will be relocated to its designated location. The proposed relocation of the light post is shown on the drawing no.: J03008-003-002A at Annex 1 revised Traffic Study Report.
3.	The swept path for HGV and fire appliance at the vehicular access encroached into the adjacent lot and exceeded the proposed run-in/out area, please review.	Noted. The updated swept path analysis for HGV and fire appliance is shown on the drawing nos.: J03008-003-001.1A to 001.5A at Annex 1 revised Traffic Study Report.
4.	Drawing No. J03008-003-001.4 - swept path for HGV crash with the workshop & plantroom, please review.	Noted. The updated swept path analysis for HGV is shown on the drawing nos.: J03008-003-001.4A at Annex 1 revised Traffic Study Report.

Annex 1

Revised Traffic Study Report

Traffic Study Report

Reference: J03008-R01-03

Date: November 2025



AMG CONSULTANCY LIMITED

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Drawing No.

J03008-003-001A

J03008-003-001.1A to 1.4A

J03008-003-001.5A

J03008-003-001.6A to 1.13A

J03008-003-002A

J03008-003-003A

Site Location

Swept Path Analysis for Heavy Goods Vehicle

Swept Path Analysis for Fire Appliance (11.7m Long)

Swept Path Analysis for Private Car

Proposed Vehicular Run-in/out Arrangement

Assessment of the Visibility Distance from
the Proposed Vehicular Run-in/out

1 Introduction

1.1 Background

This application is made on behalf of Merito Technical Services Limited (The Applicant), which has obtained consent from the registered owners of Lot 1945 RP (part) to seek permission from the Town Planning Board for temporary industrial use of both the private lot and the adjoining government land (i.e. the application site).

The application site is within an area zoned "Industrial" ("I") under the Approved Tong Yan San Tsuen Outline Zoning Plan (OZP) No. S/YL_TYST/14. While the proposed development could be regarded as 'industrial' use (not elsewhere specified)' and is always permitted, the inclusion of a Dangerous Goods Storage is classified as a Column 2 use that requires planning approval from the Town Planning Board.

AMG Consultancy Limited was engaged to prepare this Traffic Study Report, analysing the potential traffic issues of the proposed development and summarizing the findings and recommendations.

The objective of this traffic study is to evaluate the traffic and transport implications of the proposed development on the surrounding roads and transport facilities. It also aims to propose necessary improvement measures to address any traffic issues identified in the vicinity of the development.

2 Subject Site

2.1 The Site

The site is located at Lot 1945 RP (part) and adjoining government land in DD121, Tong Yan San Tsuen, Yuen Long "The Site", which is shown in Drawing no.: **J03008-003-001A**.

2.2 The parameter of the proposed scheme

The key development parameters for the proposed industrial development proposal are summarised in the table below.

Gross Site Area	About 1,014.7m ² (including 242.67m ² of government land)
Total Non-domestic GFA	About 1133.27m ²
Plot Ratio	About 1.12
Number of Structures	2 Existing Building – for DG manufacturing and godown New Extension Building – for DG manufacturing, Ancillary Workshops and Plant Rooms
Site Coverage	About 48.40%
Height of Structures	Existing Building (about 6.175m and one storey) New Extension Building (about 22.3m and three storeys)
Parking Space	2 no. of private car parking space; 1 no. of motorcycle parking space.
Loading & Unloading Space	1 no. of HGV parking space
Operation Hours (Plant Operation)	8.00 am to 8.00 pm with no operation on Sundays and public holidays

3 Internal Transport Provisions

3.1 Parking Provisions and loading/unloading facilities

According to HKPSG, the car parking provision for the proposed development and the loading/unloading required for the proposed development are shown in **Table 3.1** and **Table 3.2**. The dimensions of the parking spaces stated in HKPSG are summarised in **Table 3.3**.

Table 3.1 Parking Provisions

Type of Development	Required Provisions	Proposed Provisions
Temporary Industrial use GFA: 1133.27m ²	<u>Parking Spaces</u> Private Car: 1 per 600-750m² GFA $\cong 1-2$ Motorcycle: 5 to 10% of total PC parking $\cong 1$ <u>Loading / unloading</u> Goods Vehicle: 1 per 1000-1200m² of 50% of GFA $\cong 1$	<u>Parking Spaces</u> Private Car: 2 Motorcycle: 1 <u>Loading / unloading</u> Heavy Goods Vehicle: 1

Table 2 Provision Details

Floor No.	Provisions
Ground Floor	1 no. of HGV Loading / Unloading Space 2 no. of Private Car Parking Space 1 no. of Motorcycle Space

Table 3 Parking Space Dimensions

Type of Parking Space	Size	References
Private Car Parking Space	2.5m(W) x 5.0m(L) x 2.4m(H)	Under HKPSG
Motorcycle Parking Space	1.0m(W) x 2.4m(L) x 2.4m(H)	
Heavy Goods Vehicle	3.5m(W) x 11.0m(L) x 4.7m(H)	

3.2 Access Arrangement and Swept Path Analysis

A 7.7m wide vehicular access for the proposed development is proposed to provide at Tong Yan San Tsuen Road as shown in **Drawing no.: J03008-003-002A**.

As depicted in **Drawing no.: J03008-003-001.1A to 001.13A**, the results of the swept path analysis demonstrate that the existing site access are adequate for manoeuvring for private cars, goods vehicle and 12m long fire appliance. The design speed of the long vehicles in the swept path assessment is 5 km/h during forward design speed; 2.5 km/h during reverse speed.

To ensure safety, the loading and unloading of the goods vehicles in the parking spaces will be arranged and supervised by the relevant staff.

3.3 Visibility Distance Analysis

According to the Transport Planning and Design Manual ("TPDM") Volume 2 Chapter 3.6 Table 3.6.3.1, the required length of visibility line is 60m or above when the design speed of main road (Tong Yan San Tsuen Road) is 50 km/h.

A visibility distance analysis has been carried out as shown in **Drawing No.: J03008-003-003A**, the sight distance to the left and right are 60m and 60m, respectively, which are considered adequate.

4 Traffic Situation

4.1 Existing Road Network

The proposed development is located at a section of Tong Yan San Tsuen Road, which is a single-two lane local distributor running in the North-South direction. It joins Castle Peak Road – Ping Shan on the north, San Hi Tsuen Road on the west, Sha Tseng Road on the south and Ma Fung Ling on the east.

4.2 Public Transport

The site is well served by GMB Services in close vicinity and Franchised Bus Services at Castle Peak Road – Ping Shan. A summary of public transport services in the vicinity of the site is presented in **Table 4.1**,

Table 4.1 Bus Route of Adjacent Bus Stop

Route No.		Origin - Destination
BUS	68A	YUEN LONG (HONG KING STREET) ↔ TONG YAN SAN TSUEN (CIRCULAR)
	68X	YUEN LONG (HONG KING STREET) ↔ TONG YAN SAN TSUEN (CIRCULAR)
	268X	HUNG SHUI KIU (HUNG FUK ESTATE) ↔ JORDAN (WEST KOWLOON STATION)
	276P	TIN SHUI WAI STATION ↔ SHEUNG SHUI
	B2	YUEN LONG MTR STATION > SHENZHEN BAY PORT
	N276	TIN TSZ ↔ SAN TIN PUBLIC TRANSPORT INTERCHANGE
	N969	TIN SHUI WAI TOWN CENTRE ↔ CAUSEWAY BAY (MORETON TERRACE)
GMB	31	YUEN LONG (HONG KING STREET) ↔ TONG YAN SAN TSUEN (CIRCULAR)
	31A	TONG YAN SAN TSUEN ↔ YUEN LONG PLAZA (CIRCULAR)
	32	YUEN LONG STATION (NORTH) PTI ↔ TAN KWAI TSUEN
Route No.		Origin - Destination
LIGHT RAIL – PING SHAN STN	615	TUEN MUN FERRY PIER ↔ YUEN LONG
	610	TUEN MUN FERRY PIER ↔ YUEN LONG
	614	TUEN MUN FERRY PIER ↔ YUEN LONG
	761P	TIN YAT ↔ YUEN LONG

Due to the routes of the buses and Light Rail concentrated at Castle Peak Road – Ping Shan, it is anticipated there would be no significant conflict between the existing bus stop and the proposed development.

4.3 Development Traffic Generation and Attraction

According to the latest TPDM, the development trip rate is shown in **Table 4.2**.

Table 4.2 Development Traffic Generation and Attraction

Development	Generation		Attraction	
	AM Peak	PM Peak	AM Peak	PM Peak
Trips rates ¹ (pcu/100m ² GFA)				
Temporary Industrial use	0.0926	0.1350	0.1386	0.1049
Trips (pcus/ hour)				
Total Non-domestic GFA: 938 m ²	1	2	2	1

Note: 1. The trip rates as demonstrated in **Table 3.2** are quoted from TPDM Volume 1

2. Morning Peak is defined as 8:00a.m. to 9:00a.m. whereas afternoon peak is defined as 6:00p.m. to 7:00p.m

Due to the static nature of the proposed development, the anticipated traffic generation is expected to be minimal. An assessment has determined that the development will not have a significant impact on the area's traffic conditions. During peak hours, traffic generation is projected to include 1 vehicle in the morning and 2 vehicles in the evening, while the development is expected to attract 2 vehicles in the morning and 1 vehicle in the evening. This level of traffic generation is considered negligible.

According to information provided by the applicant, arrangements can be made only for Heavy Goods Vehicles (HGVs) to enter and exit the site during morning off-peak hours twice a month, thereby avoiding any adverse impact on traffic conditions.

Additionally, the site is accessible to both HGVs and fire appliances. Sufficient on-site space will be allocated for vehicle maneuvering, as well as for loading and unloading activities. The design ensures smooth operations, and no queuing of vehicles is anticipated.

4.4 Existing Obstacle

To facilitate the construction of the proposed run-in/out, the existing lamp post No. H4118 will be affected. Subject to the approval of this planning application, the applicant will proceed with the necessary arrangements for its relocation.

5 Summary and Conclusion

5.1 Summary

The applicant intends to apply for planning permission to redevelop the Application Site at Lot 1945 RP (part) and adjoining government land in DD121, Tong Yan San Tsuen into a temporary industrial use (the proposed component of a Dangerous Goods Godown).

The application site falls within an area zoned "Industrial" ("I") on the Approved Tong Yan San Tsuen Outline Zoning Plan (OZP) no. S/YL_TYST/14. According to the Notes for the "I" Zone, although the proposed work of the development could be regarded as 'industrial' use (not elsewhere specified)', which is always permitted.

A 13.0m-wide site access, including a 7.7m-wide vehicular access and a 1.5m-wide of the left wing and 1.5m-wide of the right wing. It is proposed at Tong Yan San Tsuen Road to provide direct access to pedestrians and motorists from the local road network. Various measures are proposed to maintain traffic circulation and enhance safety on the proposed development.

The internal transport facilities of the proposed temporary industrial use will be provided with reference to Hong Kong Planning Standards and Guidelines. They include:

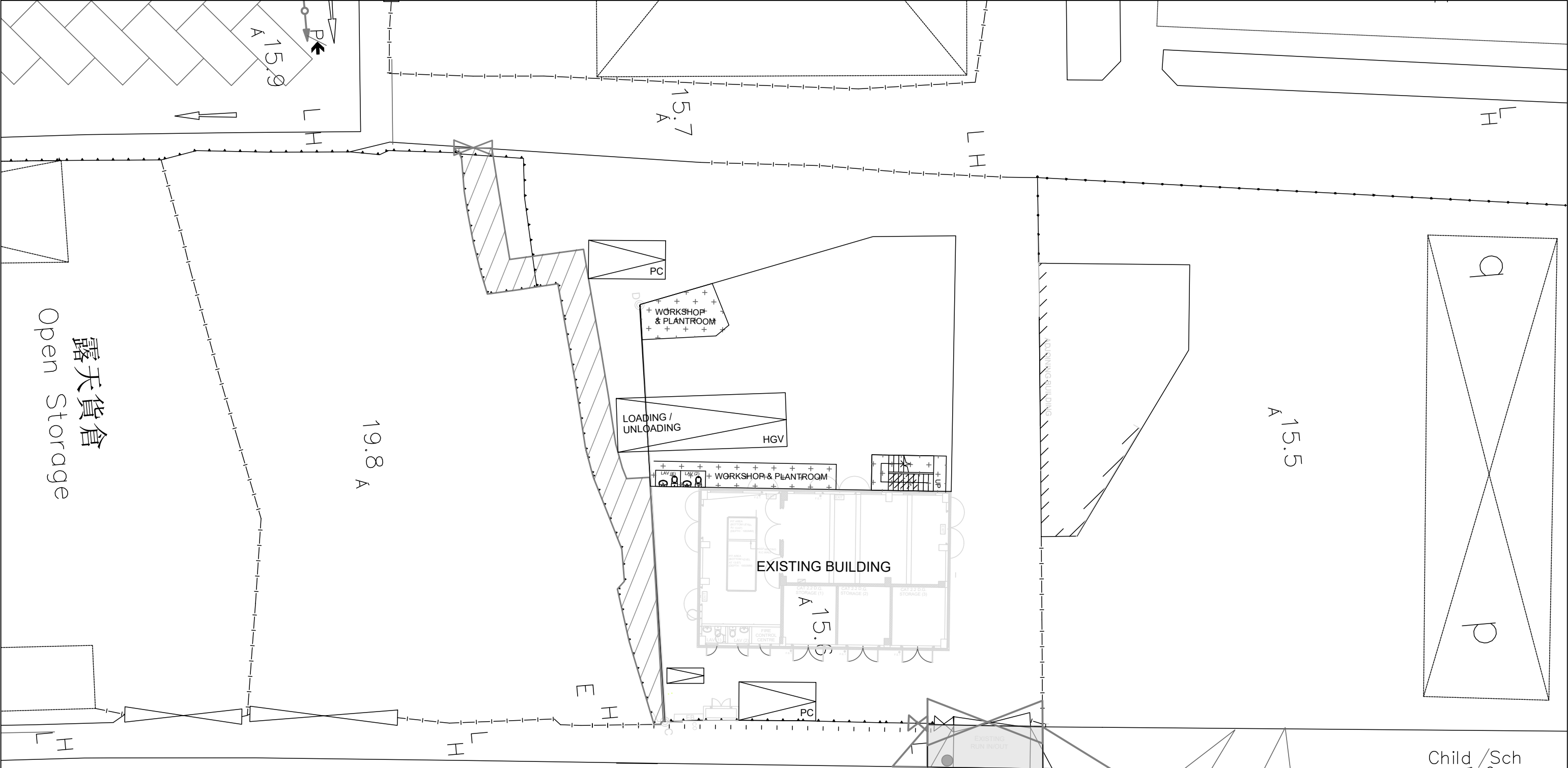
- (i) 2 no. of private car parking space@2.5m(W) x 5.0m(L) x 2.4m(H),
- (ii) 1 no. of motorcycle parking space@1.0m (W) x 2.4m(L) x Min. 2.4m (H),
- and
- (iii) 1 no. of Heavy Goods Vehicle loading/unloading bay@3.5m(W) x 11.0m(L) x 4.7m(H).

The swept path analysis revealed that the proposed vehicular access is adequate for serving HGV, Fire Appliance, private car and motorcycle in the daily operation.

Conclusion

The findings of this report indicate that no significant impact will be induced by the proposed development. The provisions of loading/unloading spaces and the parking provisions can comply with the HKPSG requirements. The swept path analysis has been carried out with private cars, heavy goods vehicles and fire appliance; and the results reveal that access is considered satisfactory. It is concluded that the design and provision of the proposed vehicular access, vehicle parking and the loading/unloading facilities and manoeuvring spaces for the proposed development are adequate and comply with the traffic engineering point of view.

Drawings



TONG YAN SAN TSUEN ROAD

LEGEND

LOADING AND UNLOADING SPACE FOR HGV

PRIVATE CAR SPACE

MOTORCYCLE SPACE

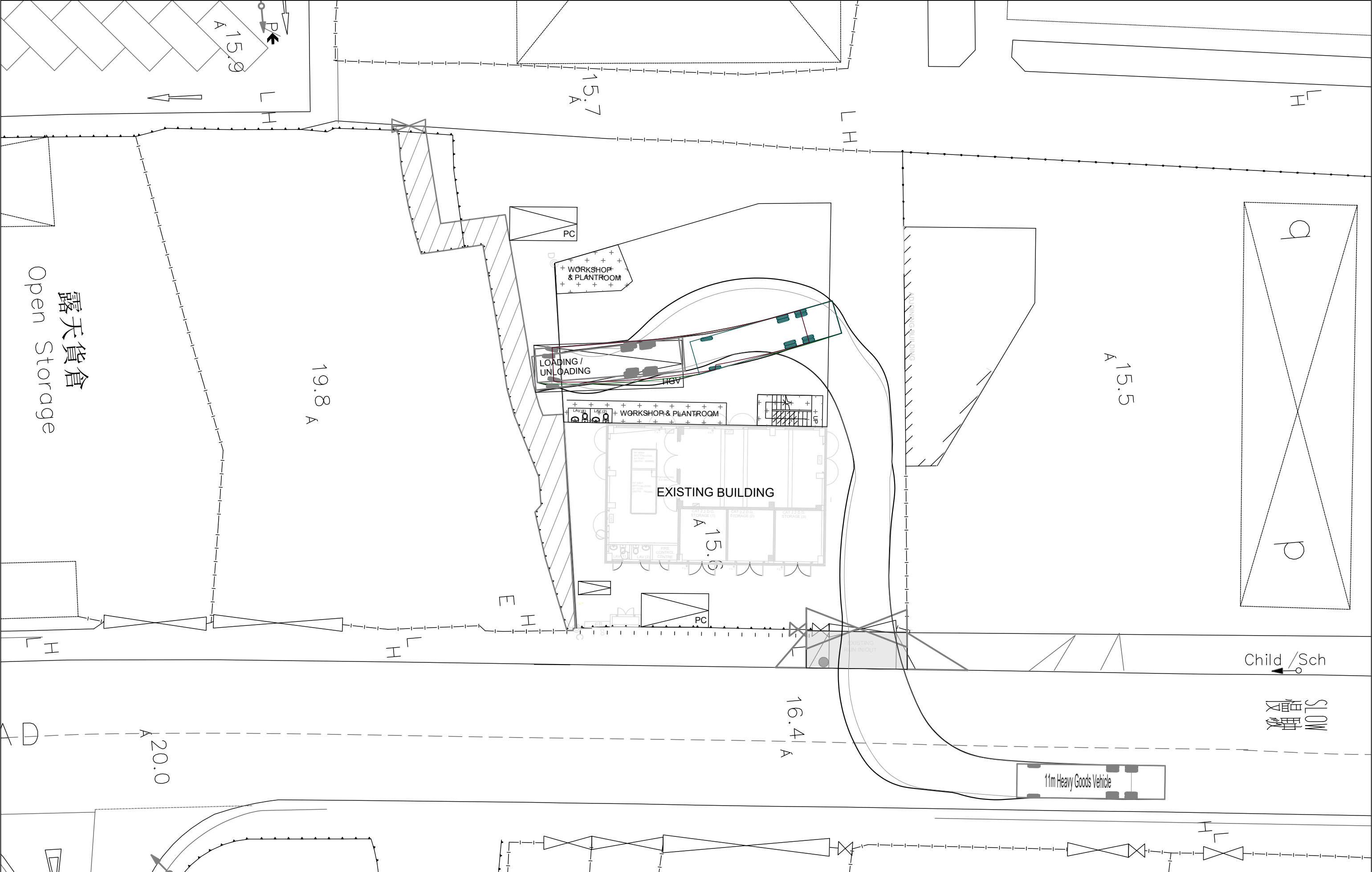
Child / Sch

慢車道

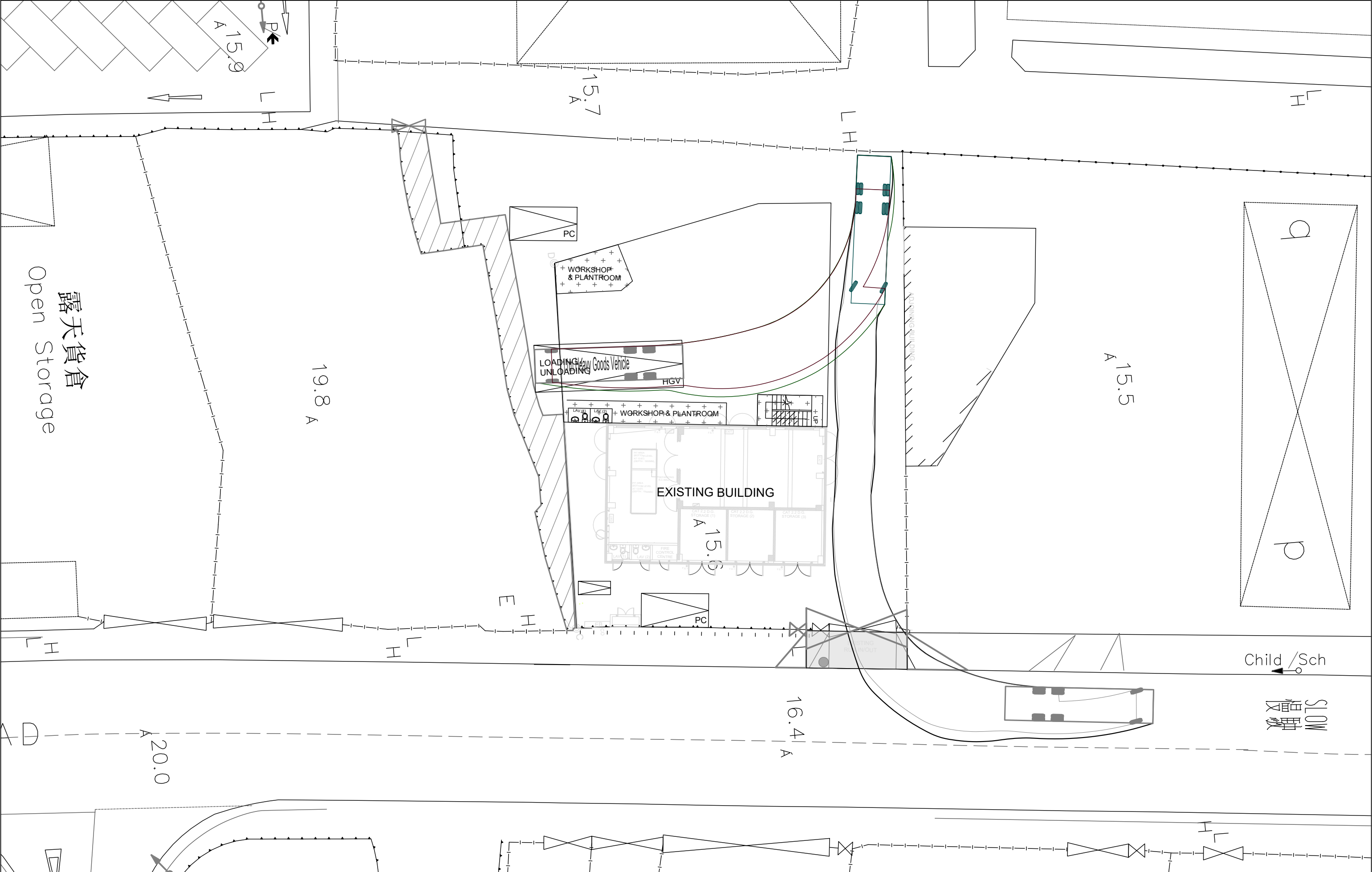
SLOW

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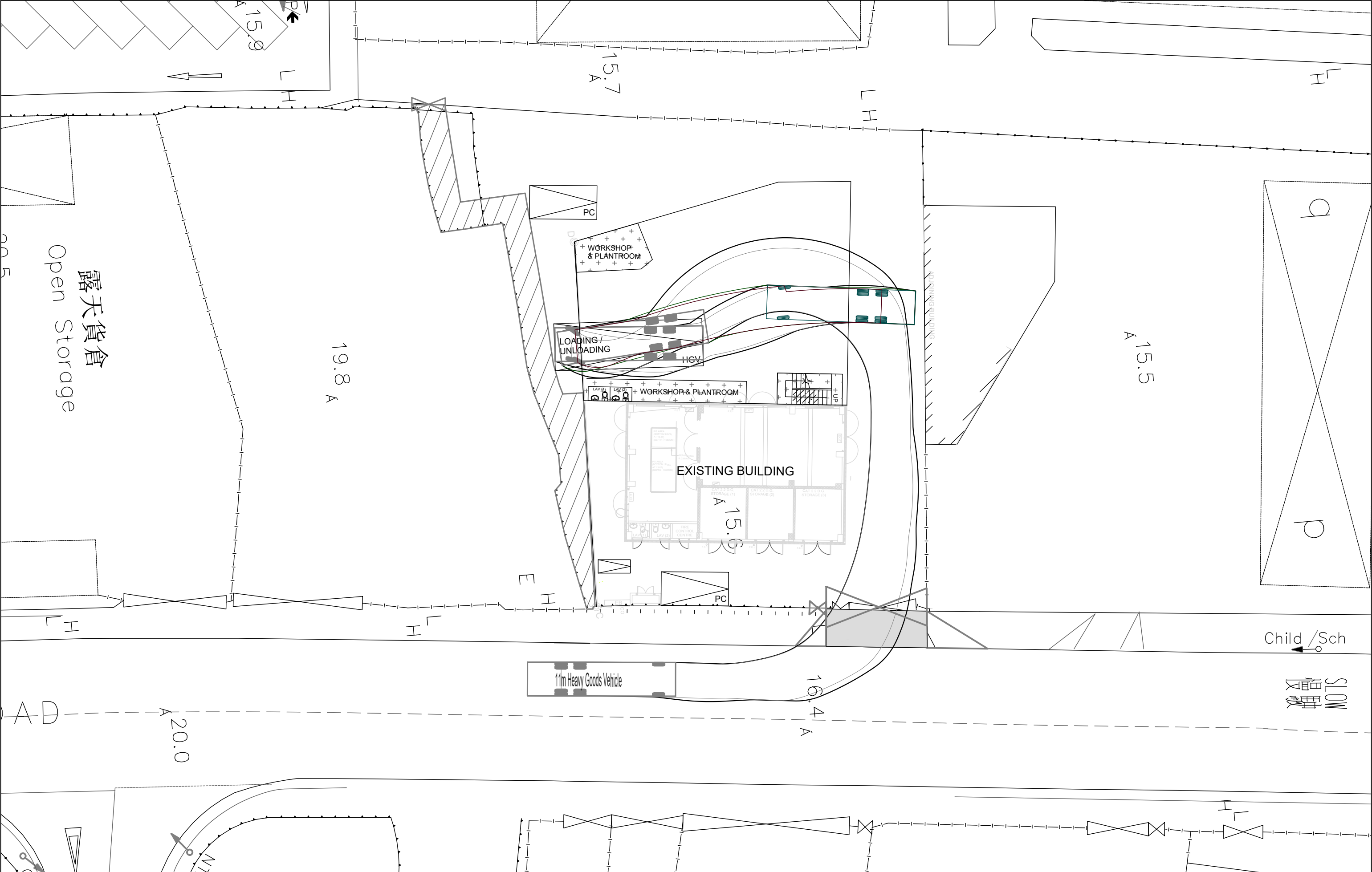
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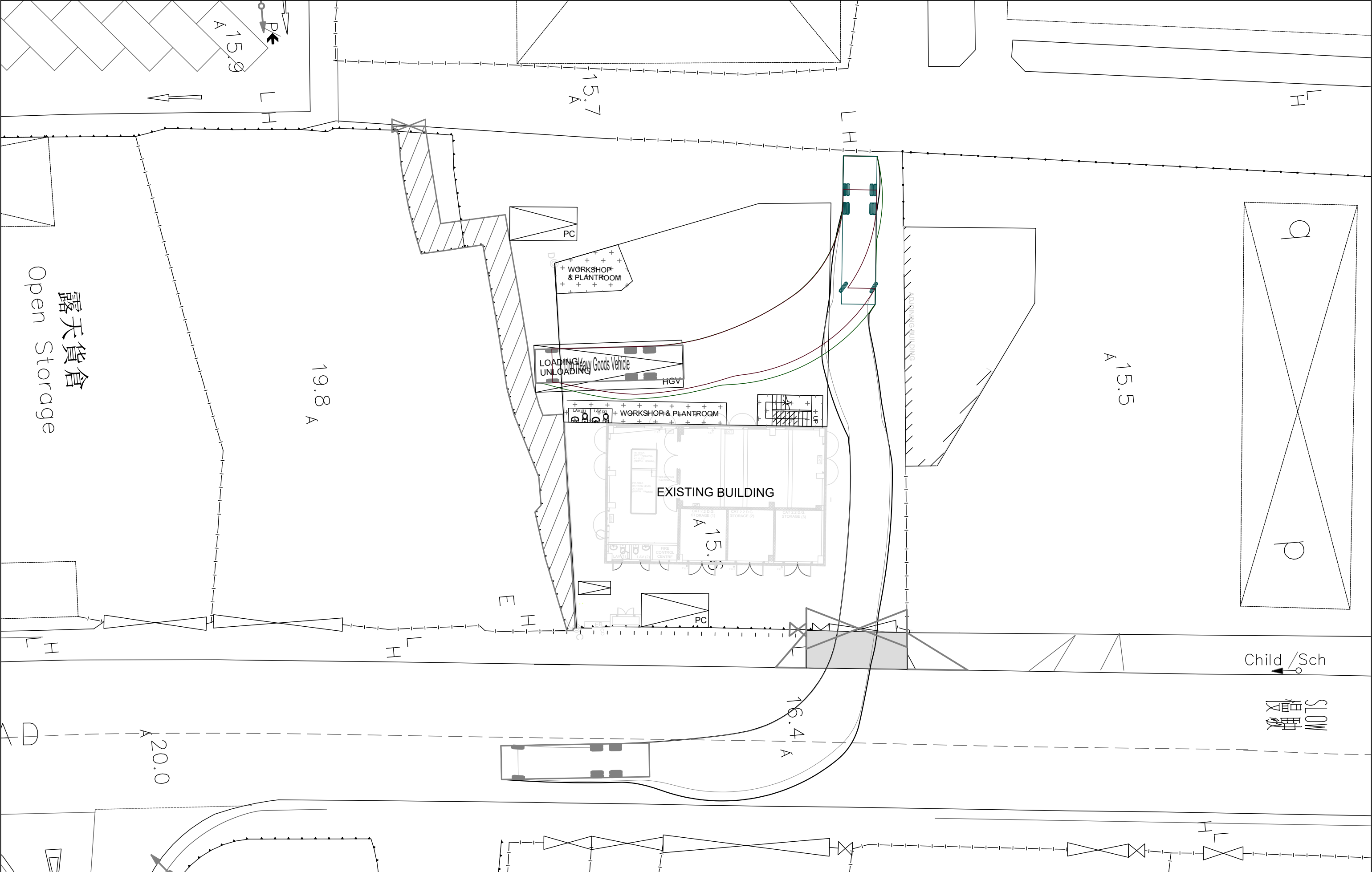
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			A	1st AMENDMENT	NOV 2025	DRAWING NO. : J03008-003-001.1A	



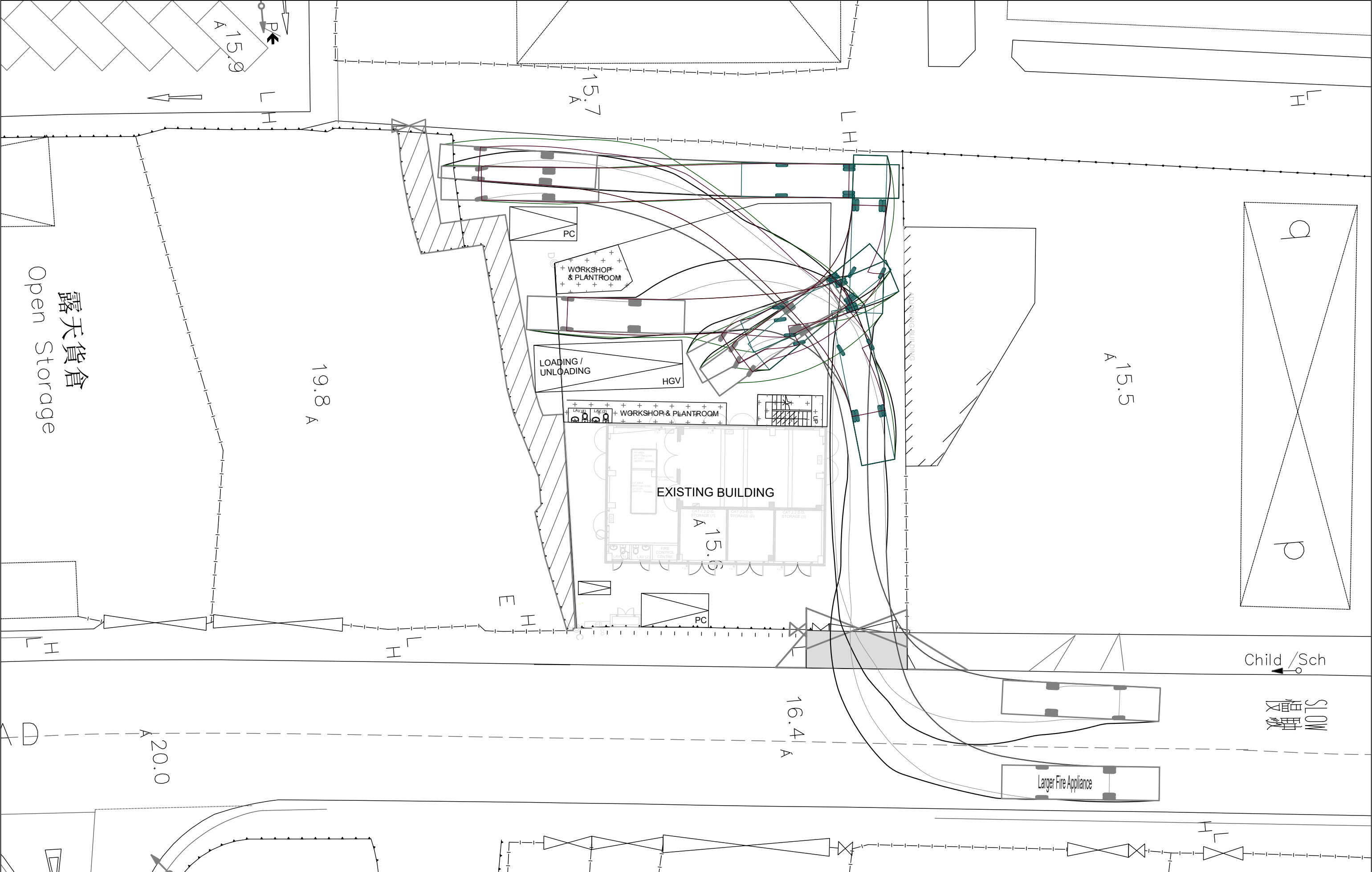
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			A	1st AMENDMENT	NOV 2025			
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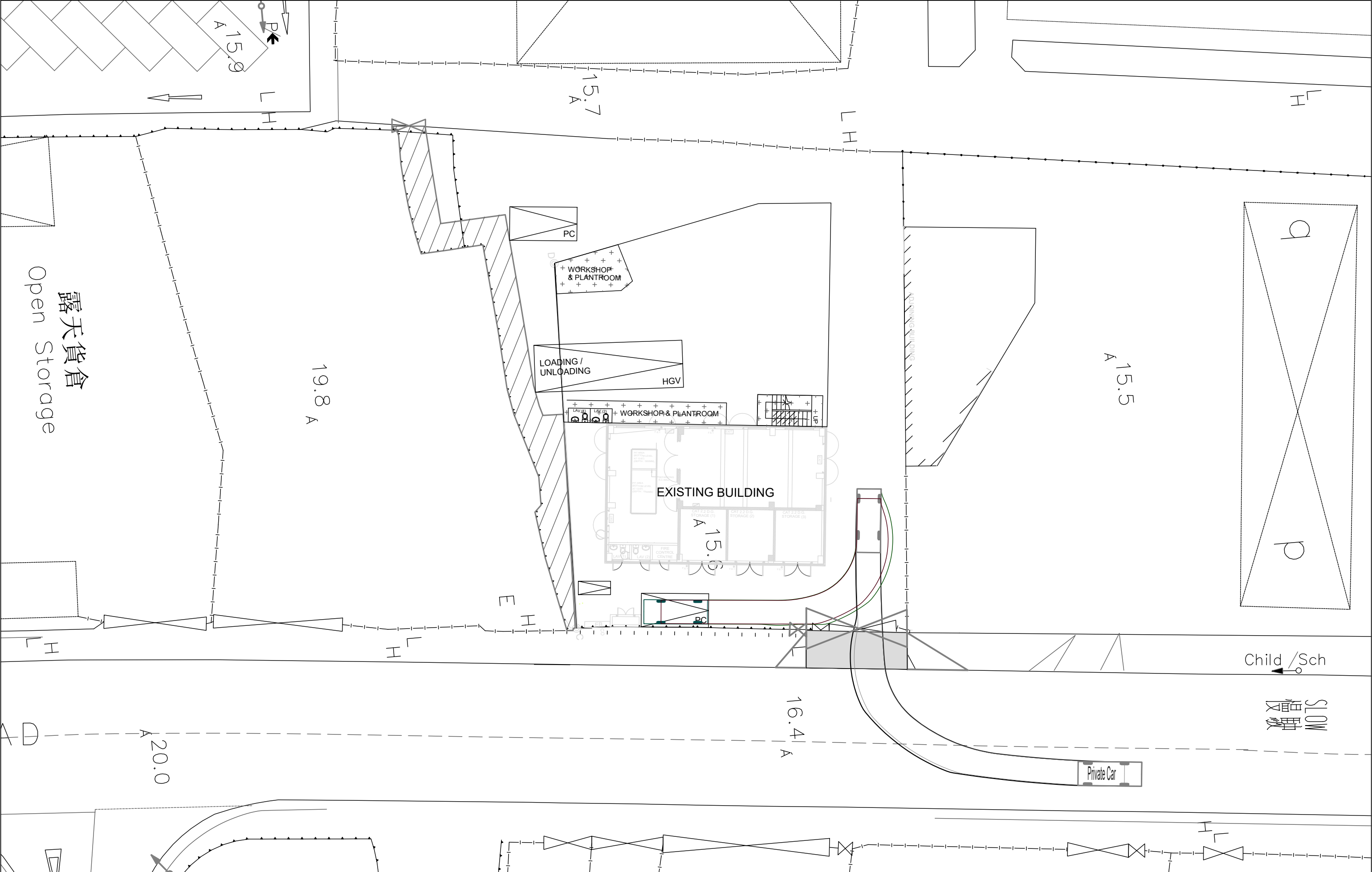
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			A	1st AMENDMENT	NOV 2025		
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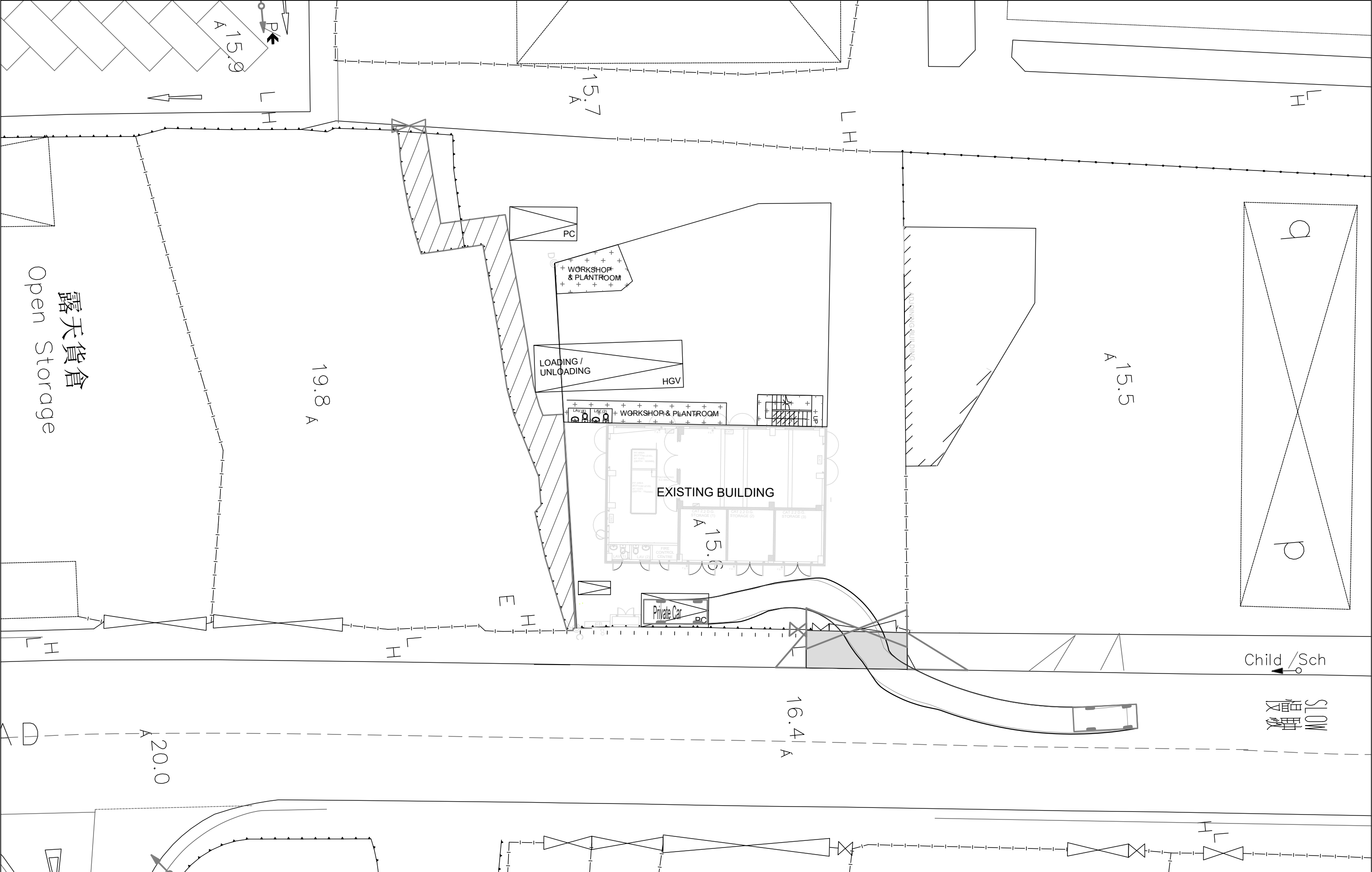
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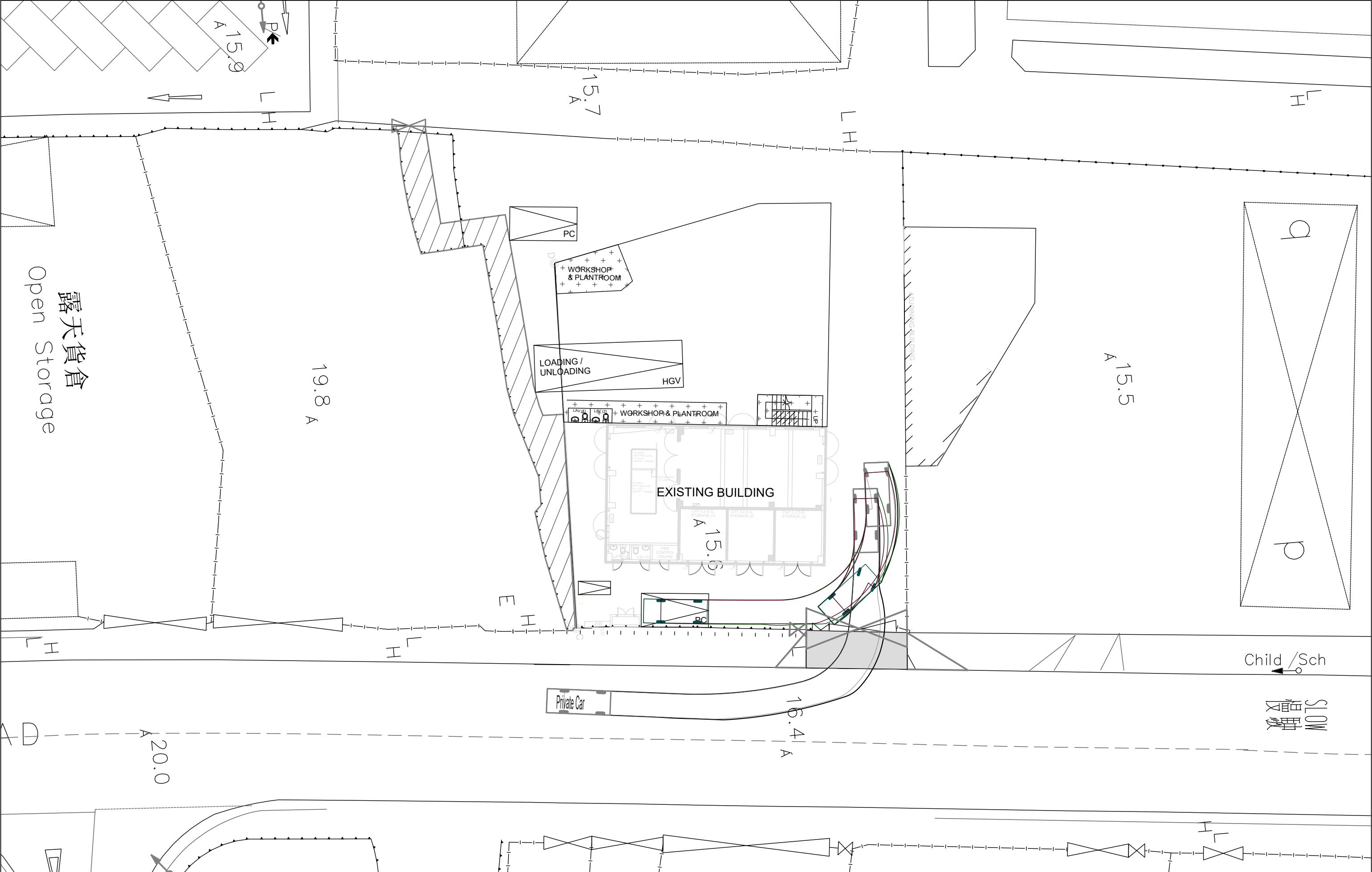
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			-	FIRST SUBMISSION	JULY 2025	NOV 2025	N.T.S
	DRAWING TITLE : SWEPT PATH ANALYSIS FOR FIRE APPLIANCE (11.7m LONG)	PROJECT NO. : J03008	A	1st AMENDMENT	NOV 2025	DRAWING NO. : J03008-003-001.5A	



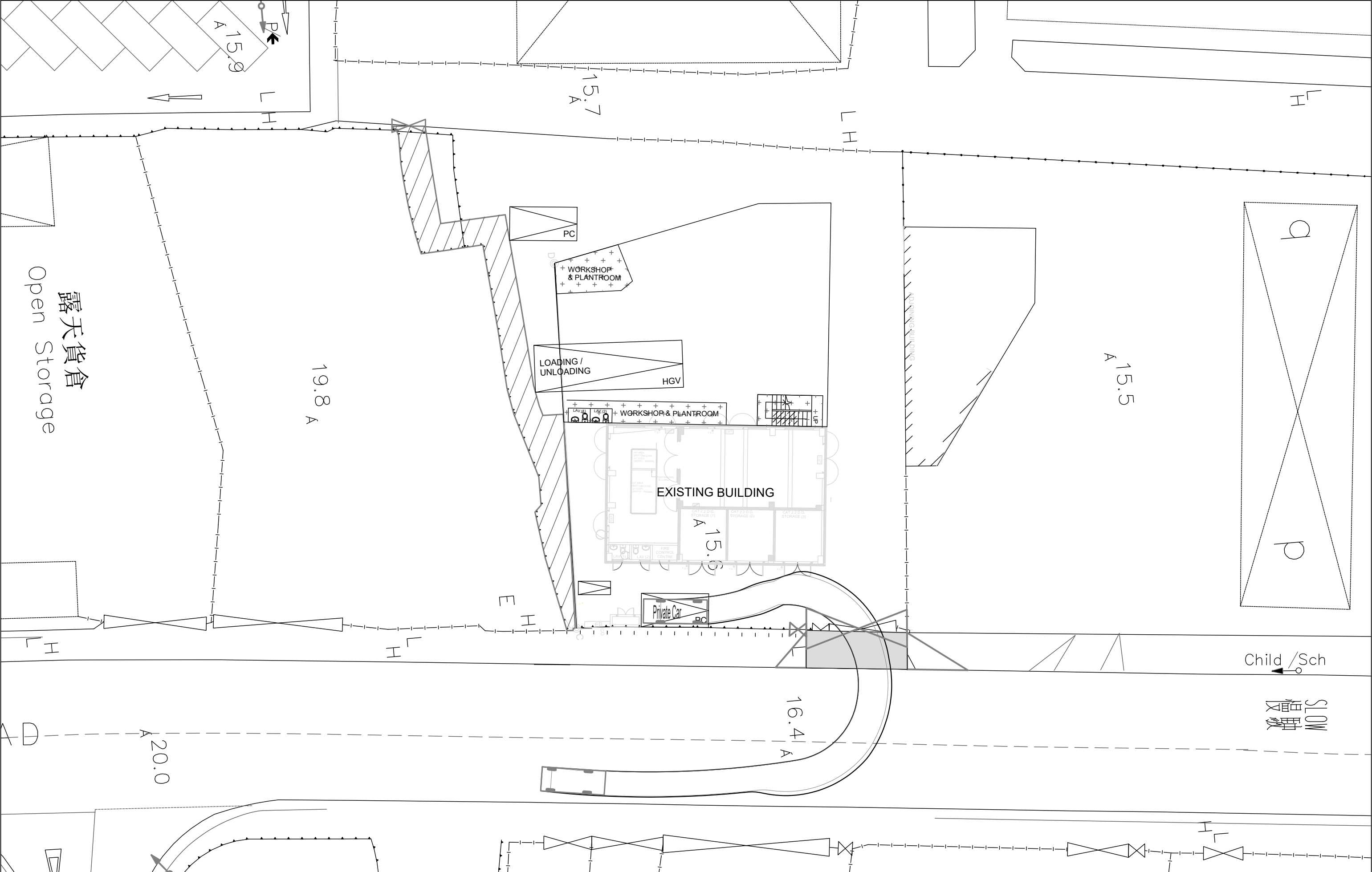
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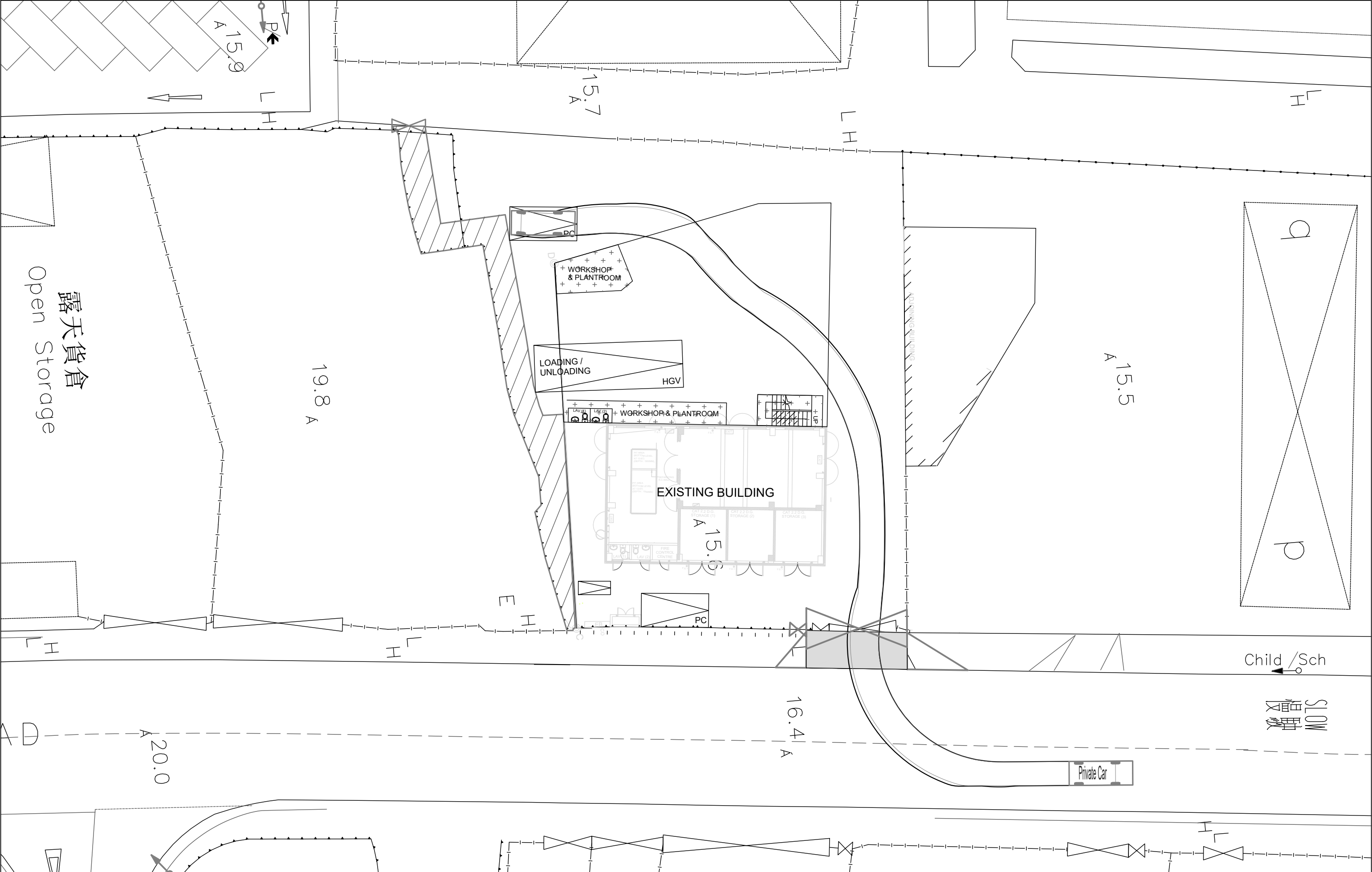
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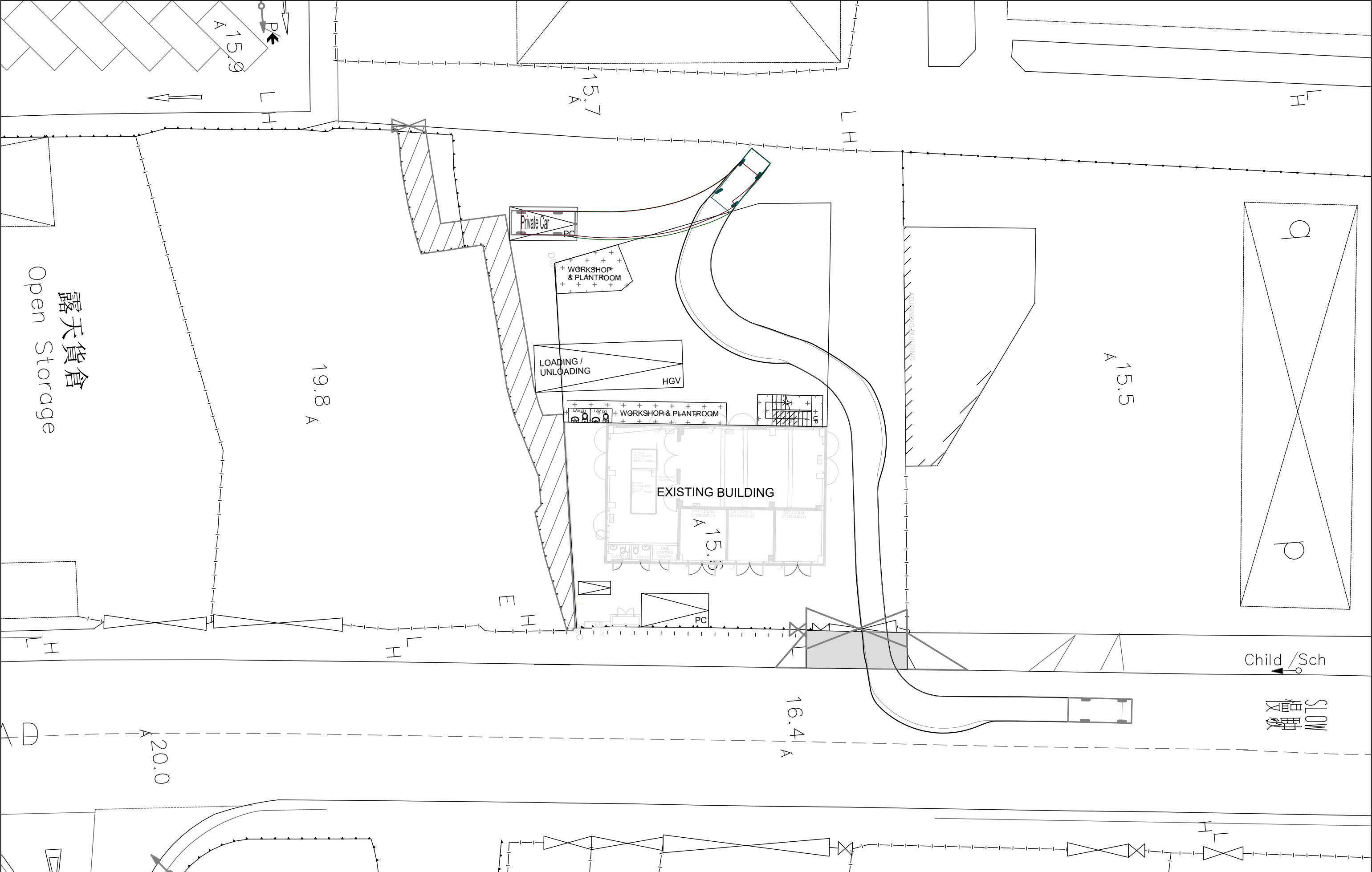
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	DRAWING TITLE :	SWEPT PATH ANALYSIS FOR PRIVATE CAR	PROJECT NO. :	J03008	A	1st AMENDMENT	NOV 2025	DRAWING NO. :	J03008-003-001.8A



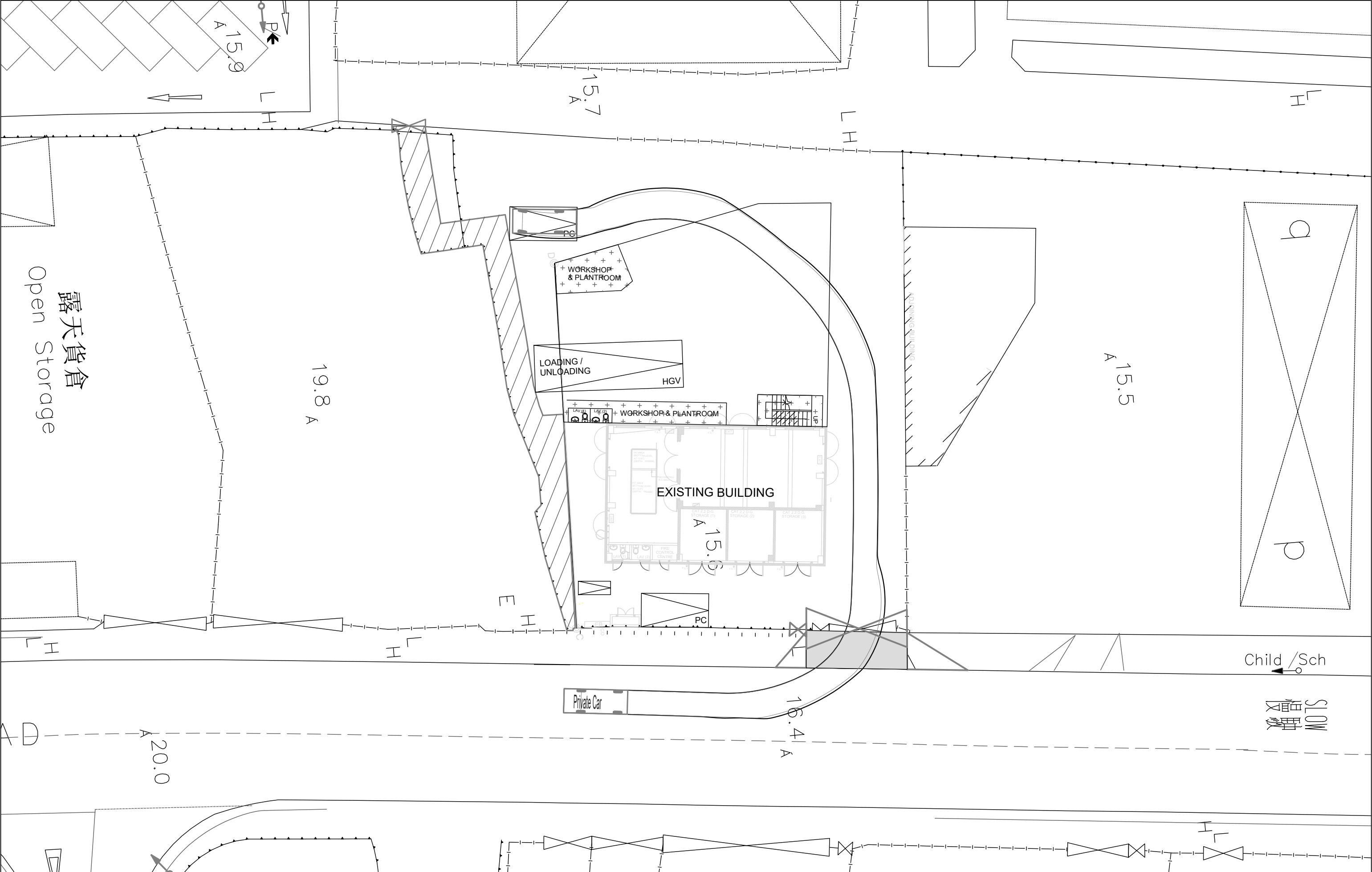
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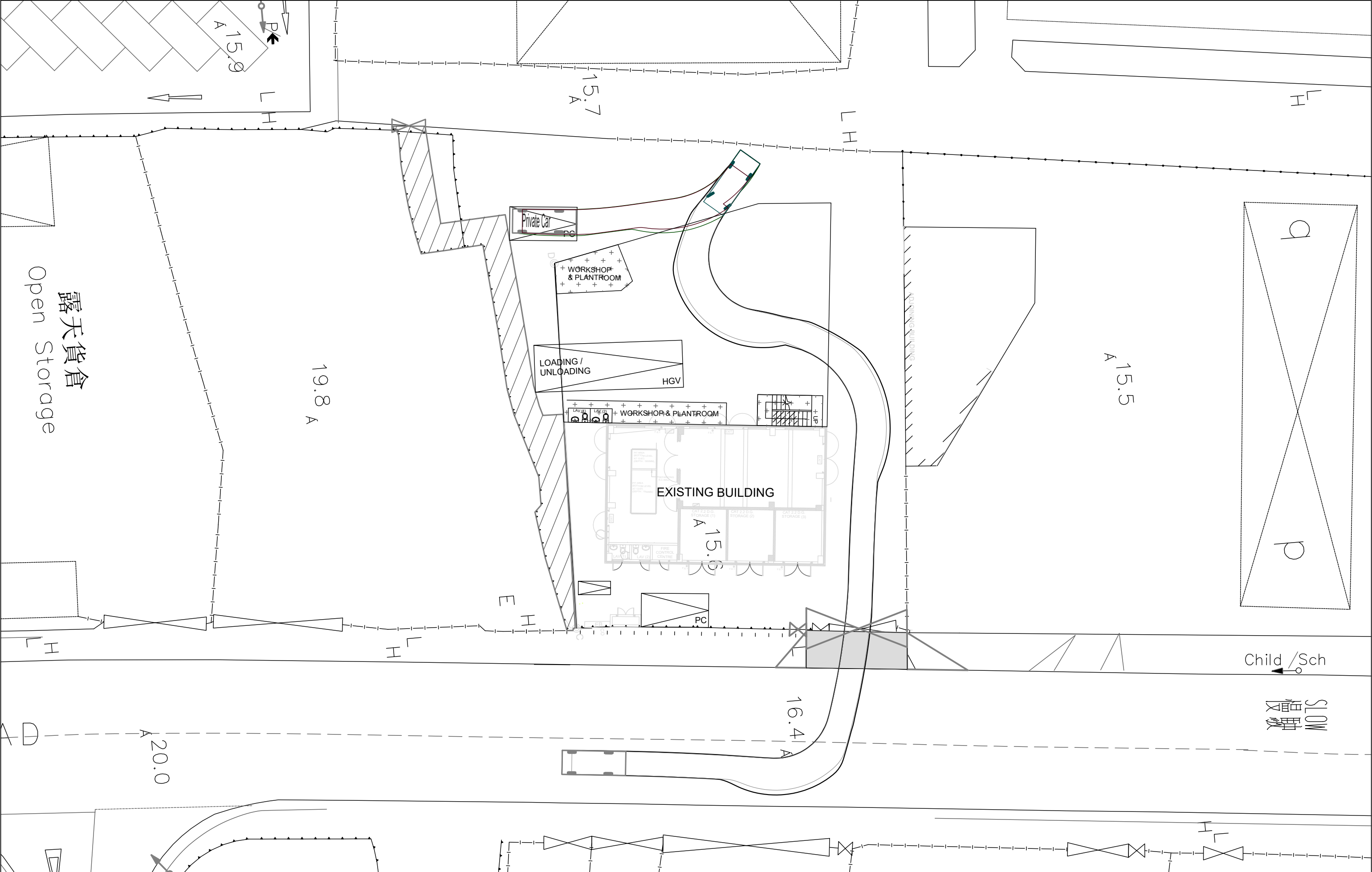
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DRAWING TITLE :		PROJECT NO. :												
SWEPT PATH ANALYSIS FOR PRIVATE CAR		J03008												



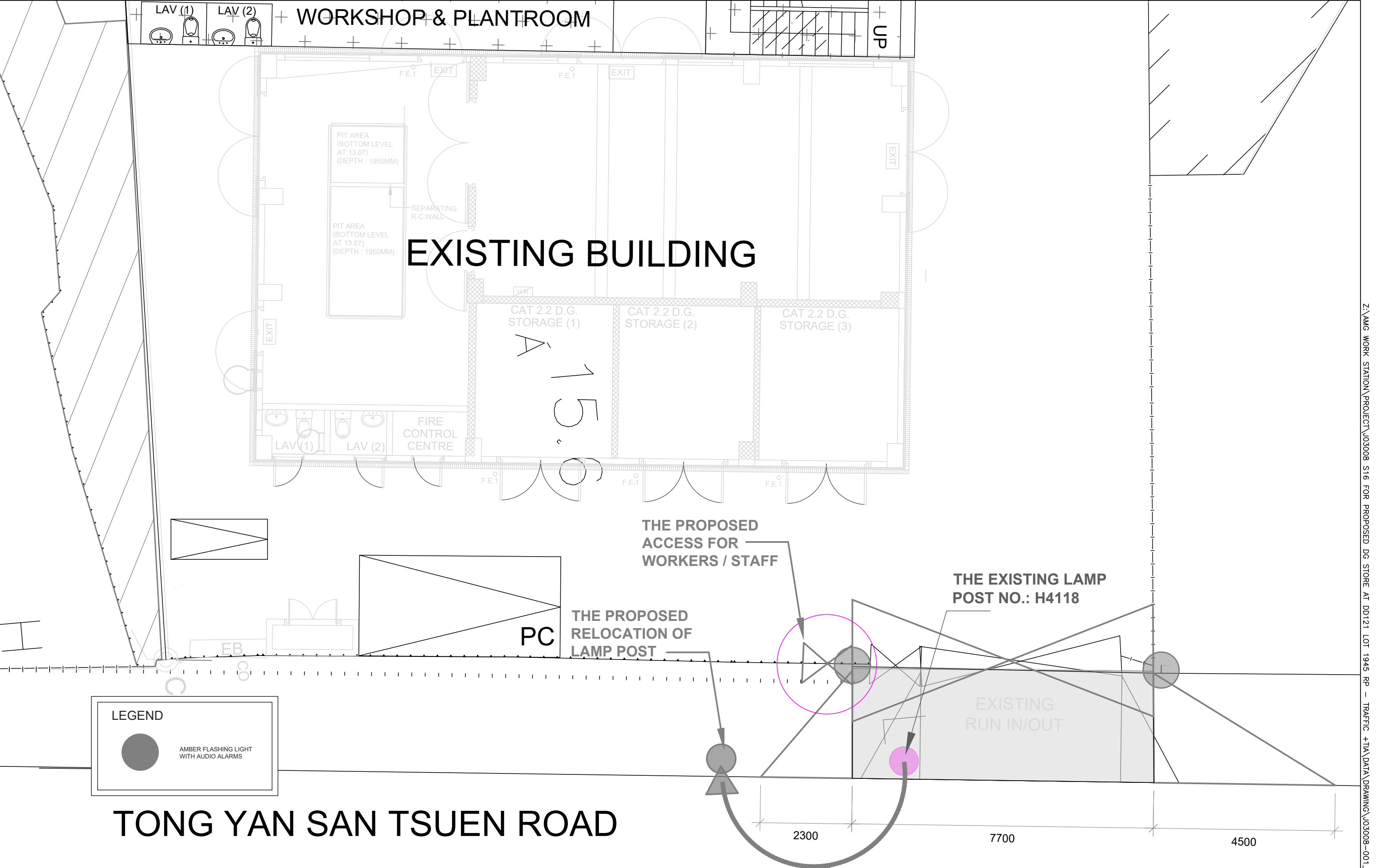
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	DRAWING TITLE : SWEPT PATH ANALYSIS FOR PRIVATE CAR						DRAWING NO. : J03008-003-001.11A	



TRAFFIC CONSULTANT :  AMG CONSULTANCY LIMITED	PROJECT TITLE :		PLAN I.D. :	REV. :	DESCRIPTION :	DATE :	DRAWING DATE :	SCALE :	
	Section 16 Planning Application for temporary permission of three years at Lot 1945 RP in DD121 and adjoining government land, Tong Yan San Tsuen, Yuen Long, New Territories			-	FIRST SUBMISSION	JULY 2025	NOV 2025	N.T.S	
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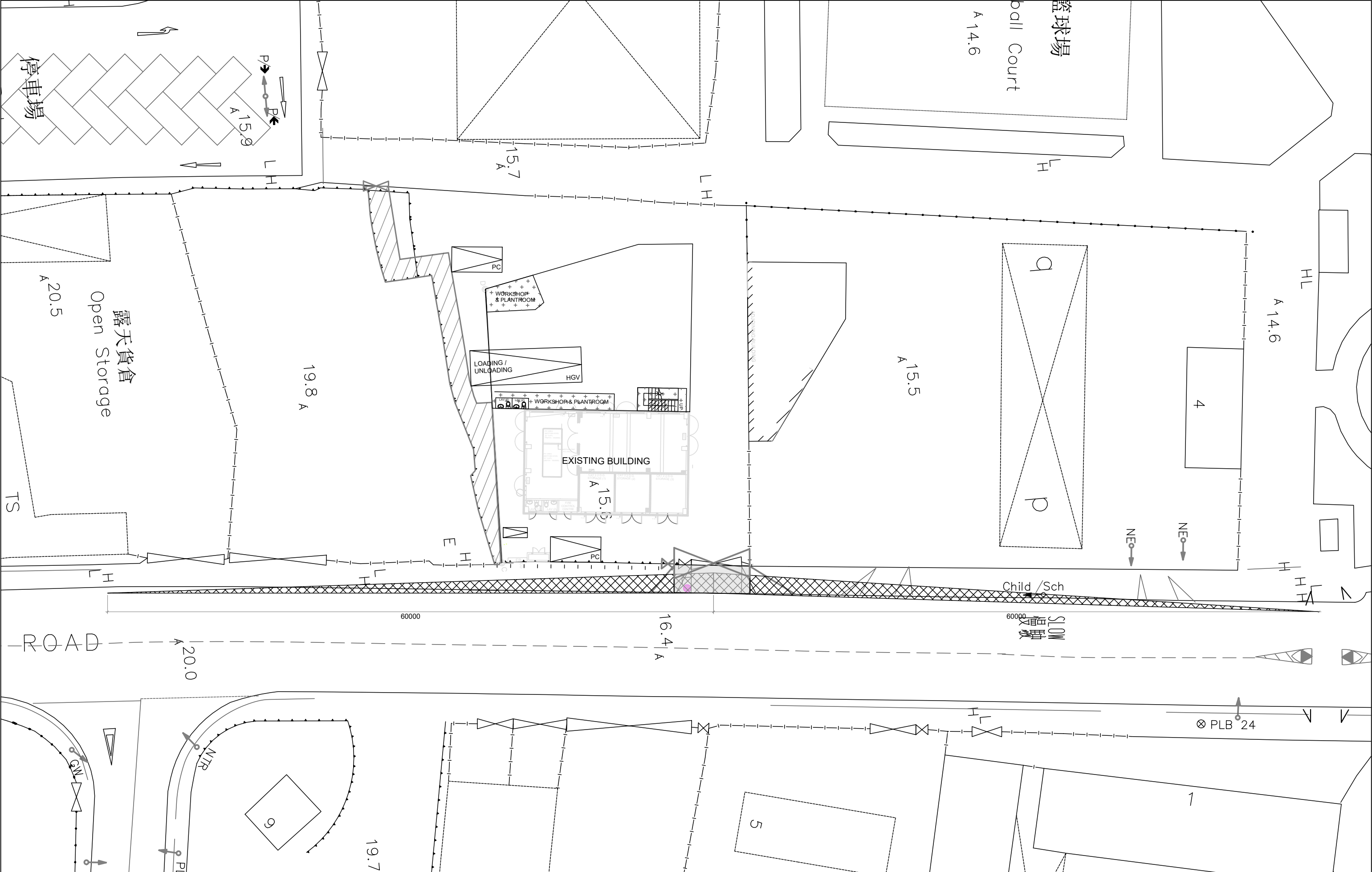
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TRAFFIC CONSULTANT : 	PROJECT TITLE :	PLAN I.D. :	REV. :	DESCRIPTION :	DATE :	DRAWING DATE :	SCALE :
	Section 16 Planning Application for temporary permission of three years at Lot 1945 RP in DD121 and adjoining government land, Tong Yan San Tsuen, Yuen Long, New Territories		-	FIRST SUBMISSION	JULY 2025	NOV 2025	N.T.S
			A	1st AMENDMENT	NOV 2025	DRAWING NO. : J03008-003-002A	
	DRAWING TITLE : PROPOSED VEHICULAR RUN-IN / OUT ARRANGEMENT	PROJECT NO. : J03008					

W ACCESS - 20251105.DWG

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TRAFFIC CONSULTANT :  AMG CONSULTANCY LIMITED	PROJECT TITLE :		PLAN I.D. :	REV. :	DESCRIPTION :	DATE :	DRAWING DATE :	SCALE :
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				A	1st AMENDMENT	NOV 2025		
	DRAWING TITLE : ASSESSMENT OF THE VISIBILITY DISTANCE FROM THE PROPOSED SCHEME						DRAWING NO. : J03008-003-003A	