

By Hand and Email (tpbpd@pland.gov.hk)
16 September 2026

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

arup.com

Your ref TPB/A/YL/335
Our ref 316859/00/WLL/CYSL/CZZL/05878

Dear Sir/Madam,

**Application for Permission
Under Section 16 of Town Planning Ordinance (Cap. 131)**

Proposed Temporary Public Vehicle Park (Excluding Container Vehicle) with Ancillary Electric Vehicle Charging Facilities and Utility Installation for Private Project (Solar Photovoltaic System) for a Period of 6 Years at Lot 104 RP (Part) in D.D. 115, Yuen Long, New Territories (Planning Application No. A/YL/335)

Submission of Technical Clarification

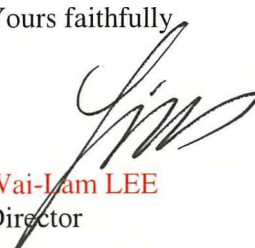
We refer to the comments from related departments from 27 August 2026 to 14 September 2026 on the captioned Planning Application. On behalf of the Applicant, we are pleased to submit herewith a Response-to-Comments Table together with the supporting Appendices.

Please note that this submission only serves as technical clarification and has not involved changes in the scheme or major changes in the findings of the technical assessments, thus should be exempted from the recounting requirement.

We sincerely seek the favourable consideration from the Town Planning Board to approve the captioned S16 Planning Application.

Should you have any queries, please contact the undersigned or our Ms. Zephyr LIU at [REDACTED]
[REDACTED] or our Ms. Sabrina LAW at [REDACTED]

Yours faithfully


Wai-Iam LEE
Director

Enc - 4 copies of the Response-to-Comments Table and Appendices
cc client

Comments from Related Departments

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COMMENTS FROM RELATED DEPARTMENTS

No.	Comments	Responses
1.	Civil Engineering and Development Department, Geotechnical Engineering Office, Planning and Development Division, Hong Kong Geological Survey Section, dated 02 September 2026 1. The subject application could affect or be affected by existing man-made features as shown on the attached location plan (Annex 1), and meets the criteria for submission of a Geotechnical Planning Review Report (GPRR). In accordance with the Guidance Notes on Application for Permission under Section 16 of the Town Planning Ordinance (CAP 131), it is recommended that you should request the applicant to submit a GPRR to support the application. The essential contents of a GPRR are given in Annex 2. 2. It is noted that the southern side of the site is within the MTR protection zone (Annex 1). You are recommended to circulate the captioned application to parties/Government department (e.g. HyD) for comments as appropriate. 3. Please remind the applicant to submit the proposed building works to the Buildings Department for approval as required under the provisions of Buildings Ordinance. 4. Please remind the applicant that the subject site is located within Schedule Area No. 2 and may be underlain by cavernous marble. Depending on the nature of foundation, if necessary, of the proposed development at the subject site, extensive geotechnical investigation may be required. Such investigation may require high level of involvement of an experienced geotechnical engineer in both the design and supervision of the geotechnical works required at the subject site.	Noted. Based on the GPRR submitted for approved planning application A/YL/301, and referenced in approved planning application A/YL/328, as the surface of the existing slope features are protected by extensive vegetation with tree root system, the washout failure of the slope is unlikely to occur. Should the planning application be approved by the Town Planning Board (TPB), a GPRR will be submitted, as well as the mitigation and preventive measures identified therein (if any) will be implemented to the satisfaction of CEDD. The Applicant will address any relevant comments, as appropriate, upon receipt. Noted. The potential presence of cavernous marble and the possible need for additional ground investigation, depending on the nature of the proposed foundation works, are well noted.

Responses to Comments – Departmental Comments

No.	Comments	Responses
2.	Environment and Ecology Bureau, Environment Branch, Air Policy Division, Air Policy Group, dated 27 August 2026 (a) It is noted from para. 4.1.1 and 4.2.2 of the planning statement that: <u>Para.4.1.1:</u> <i>“...The Proposed Development provides a total of 68 nos. of parking spaces, including 6 for Light GV's (LGVs) (3.5m x 7m), and 62 for private vehicles (2.5m x 5m). All proposed parking spaces will be equipped with EV charging facilities...”</i> <u>Para. 4.2.2:</u> <i>“The EV charging facilities would be fast chargers of speed 100kW or above,...”</i> (a) To echo with the latest version of Ch.8 of HKPSG about EV charging facilities and to support the Government's policies in promoting the wider adoption of EVs, the applicant is suggested to comply with the relevant requirement of HKPSG, i.e., EV chargers with output power <u>of not less than 7kW</u> should be installed in <u>all parking spaces for private cars, light goods vehicles</u> and motorcycles of the subject site (i.e., when all the 62 private car parking spaces and 6 light goods vehicle parking spaces are occupied by EVs and recharging at the same time, each of the 62 private car parking spaces and 6 light goods vehicle parking spaces could still be provided with at least 7kW EV charging simultaneously). Grateful for the applicant's clarification whether their proposed EV charging provision will meet the aforesaid suggested requirement. (b) The Government announced the Green Transformation Roadmap of Public Buses and Taxis in December 2024, including measures to realise the target of introducing about 3 000 electric taxis by end-2027. A comprehensive fast charging network is needed to effectively support the operations of electric taxis and achieve the aforesaid target. In addition, the Government	Noted. In accordance with the relevant requirement of HKPSG, the proposed EV charging system will provide a minimum charging output of 7kW simultaneously to all proposed 68 parking spaces (62 private car spaces and 6 LGV spaces). Noted. In support of the Government's policy initiatives on the wider adoption of electric vehicles and the development of fast-charging infrastructure, the proposed development will provide EV fast chargers with a charging output of 100kW or above, as appropriate.

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	announced the Updated Version of the Hong Kong Roadmap on Popularisation of Electric Vehicles in February 2026, which states that the Government will leverage market forces in the future to build a public charging network with fast chargers as the In this connection, we recommend that the applicant consider installing some fast chargers with a rated output power of 100kW or higher at the subject site and open up a certain number of charging spaces for electric commercial vehicles for use, e.g. electric taxis, electric light goods vehicles. (c) The applicant is also suggested to consider arranging some of the chargers to also be compatible with Guobiao charging standard to support southbound vehicles. (d) It is recommended that the applicant provide charger information, including the real-time availability data of each charger, through the government-designated mobile applications such as “HKeMobility” of the TD. For any queries, please contact the EPD’s EV Hotline at 3757-6222 or email to ev@epd.gov.hk.	Noted. Some of the proposed EV chargers will be compatible with the Guobiao (GB) charging standard to facilitate charging by eligible southbound vehicles, where appropriate. Noted. The Applicant would review the possibility in providing charger information in later operation stage, subject to the relevant technical requirements, data standards and operational arrangements prescribed by the relevant authorities.
3.	Environmental Protection Department, dated 31 August 2026 (a) Based on the information provided, we understand that car parking spaces would be provided for LGVs and private cars. According to our review, there are residential buildings within 100m of the subject site boundary. (b) As the proposed development would not involve traffic of heavy vehicle, we have no objection from environmental planning perspective, despite its proximity to residential buildings, according to the “Code of Practice on Handling the Environmental Aspects of Temporary Uses and Open Storages Sites” (“COP”). (c) Should the application be approved, the Applicant should be reminded of his obligation to comply with all environmental protection / pollution control ordinances,	The proposed temporary public vehicle park is intended for private cars and LGVs only. Given that no heavy vehicle activities are involved, no significant adverse environmental impact on the nearby residential developments is anticipated. Noted. Noted.

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	and the required mitigation measures in the COP, to minimize the potential environmental nuisance on the surrounding area. In particular, the Applicant is advised to implement the standard precautionary measures specified in EPD's "Recommended Pollution Control Clauses for Construction Contract" during the construction phase.	
4.	Electrical & Mechanical Services Department, Electricity and Energy Efficiency Branch, Electricity Legislation Division, Nuclear & Utility Safety Sub-division 1, dated 27 August 2026 (a) Please be advised that we have no particular comment on the document from electricity supply safety aspect. However, in the interests of public safety and ensuring the continuity of electricity supply, the parties concerned with planning, designing, organizing and supervising any activity near the underground cable (Power) for the requisition of cable plans to find out whether there is any underground cable within and/or in the vicinity of the concerned site. They should also be reminded to observe the Electricity Supply Lines (Protection) Regulation and the "Code of Practice on Working near Electricity Supply Lines" established under the Regulation when carrying out works in the vicinity of the electricity supply lines. (b) Electrical work on fixed electrical installation shall be conducted by the Registered Electrical Contractors (REC) and the Registered Electrical Workers (REW) with all the involved electrical work fully comply with the requirements stipulated under the Electricity Ordinance (Cap 406) and its subsidiary regulations. Regarding charging facilities for electric vehicles and renewable energy power system, your attention is drawn to the requirements stipulated under Code 26S and 26P respectively of the Code of Practice for the Electricity (Wiring) Regulations (2025 Edition).	Noted. The Applicant will obtain the necessary utility records and comply with the Electricity Supply Lines (Protection) Regulation and relevant Code of Practice during the detailed design and implementation stages, as appropriate. Noted. All fixed electrical installations associated with the proposed EV charging facilities and solar photovoltaic system will be carried out in accordance with the Electricity Ordinance (Cap. 406), its subsidiary regulations and relevant codes of practice at the detailed design and implementation stages, as appropriate.

Responses to Comments – Departmental Comments

No.	Comments	Responses
5.	Fire Services Department, Corporate Strategy Command, Planning and Development Division, dated 27 August 2026 (a) No objection in principle to the application subject to fire service installations and water supplies for firefighting being provided to the satisfaction of the Director of Fire Services. (b) In consideration of the design/nature of the proposal, FSIs are anticipated to be required. Therefore, the applicant is advised to submit relevant layout plans incorporated with the proposed FSIs to this Department for approval. In addition, the applicant should also be advised on the following points: (i) The layout plans should be drawn to scale and depicted with dimensions and nature of occupancy; and (ii) The location of where the proposed FSI to be installed should be clearly marked on the layout plans. (c) However, the applicant is reminded that if the proposed structures are required to comply with the Buildings Ordinance (Cap. 123), detailed fire service requirements will be formulated upon receipt of formal submission of general building plans.	Noted. Noted. Should the planning application be approved by the TPB, relevant layout plans with proposed FSIs will be submitted, as well as the mitigation and preventive measures identified therein (if any) will be implemented to the satisfaction of Fire Services Department. Noted. Noted. Noted.
6.	Lands Department, Lands Administration Office, District Lands Office, Yuen Long, dated 02 September 2026 1. The application site comprises an Old Schedule Agricultural Lot held under the Block Government Lease which contains the restriction that no structures are allowed to be erected without the prior approval of the Government. 2. I must point out that the following irregularities covered by the subject planning application have been detected by this office:	Noted.

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	<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 structures and uses on the private lot which are 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. If the planning application is approved, the lot owner(s) shall apply to this office for a Short Term Waiver (STW) to permit the structure(s) erected within the said private lot. The application for STW will be considered by the Government in its capacity as a landlord and there is no guarantee that it will be approved. The STW, if approved, will be subject to such terms and conditions including the payment of waiver fee 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. 3. Please notify the applicant of our comments/requirements as stated above. 4. There is no Small House (SH) application under processing or approved at the application site.	As indicated in site photos attached in Appendix A, there are no existing structures within the Application Site and the Application Site is largely vacant. As stated in the letter from Lands Department to the lot owner on 2 April 2026 (Appendix B), the said unauthorized structures outside the Application Site are registered squatter structures. While no extension, addition or modification to these structures is being proposed, these unauthorized structures and uses are situated outside the Application Site, and will not form a part of the proposed temporary uses. Noted. Noted. Noted.
7.	MTR Corporation Limited, dated 27 August 2026 (a) All works shall comply with DevB TC(W) No. 1/2019, PNAP APP-24, and PNRC 14, where applicable. (b) All temporary works and structures shall be capable of resisting adverse weather conditions and shall not, under any circumstances, be blown away by strong winds. The temporary works and	Noted. Noted. The proposed temporary structures, including the EV charging facilities, will be designed and constructed to withstand adverse weather conditions. Certification by an Independent Checking Engineer will be

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	structures shall be certified by an Independent Checking Engineer. (c) Method statement and lifting plan shall be submitted for review and comment prior to the commencement of the works.	obtained, where required, prior to operation of the development. Noted.																			
8.	Transport Department, dated 14 September 2026 In general, we support provision of PVP to help meet parking demand in the district. However, further information is required for assessment. Please find below our comments from traffic engineering perspective for your consolidation: 1. The applicant should provide an assessment of the anticipated traffic generation and attraction during both the construction and operational stages.	Noted. The traffic generation and attraction during the construction stage are anticipated to be minimal, at approximately 5 pcu per day (i.e. 1 – 2 nos. construction vehicles). For the operational stage, the anticipated traffic generation and attraction have been estimated with reference to in-house survey data related to PVP use. The adopted trip rates and corresponding estimated vehicular trips for the proposed development comprising 68 parking spaces are summarised below: <table><tr><th rowspan="2">Proposed Development (68 parking spaces)</th><th colspan="2">AM Peak</th><th colspan="2">PM Peak</th></tr><tr><th>GEN</th><th>ATT</th><th>GEN</th><th>ATT</th></tr><tr><td>Adopted Trip Rate (pcu/hr/space)</td><td>0.1184</td><td>0.0658</td><td>0.0965</td><td>0.0789</td></tr><tr><td>Estimated Vehicular Trips (pcu/hr)</td><td>9</td><td>5</td><td>7</td><td>6</td></tr></table> As shown in the table above, the proposed development is expected to generate and attract no more than 14 pcu/hour (two-way) during the operational peak hours. Compared with the prevailing traffic flows on Long Yat Road, the traffic generated by the proposed development would represent less than 1% of the peak-hour traffic volume. Accordingly, the additional traffic demand arising from the construction and operation	Proposed Development (68 parking spaces)	AM Peak		PM Peak		GEN	ATT	GEN	ATT	Adopted Trip Rate (pcu/hr/space)	0.1184	0.0658	0.0965	0.0789	Estimated Vehicular Trips (pcu/hr)	9	5	7	6
Proposed Development (68 parking spaces)	AM Peak			PM Peak																	
	GEN	ATT	GEN	ATT																	
Adopted Trip Rate (pcu/hr/space)	0.1184	0.0658	0.0965	0.0789																	
Estimated Vehicular Trips (pcu/hr)	9	5	7	6																	

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	2. The applicant should provide details of the proposed pedestrian facilities and management arrangements to ensure pedestrian safety during operational stage. 3. The land status of the land between the site and Long Yat Road should be clarified with the Lands Department by the applicant. Moreover, the management and maintenance responsibilities of the local access road should be clarified with the relevant lands and maintenance authorities accordingly. Sufficient space should be provided within the application site for maneuvering of vehicles. In addition, no parking, queuing and reverse movement of vehicles on public roads are allowed.	of the proposed temporary PVP with ancillary electric vehicle charging facilities is considered minimal, and no adverse traffic impact on the surrounding road network is anticipated. During the operational stage, adequate pedestrian circulation and waiting areas will be provided within the proposed development to serve users accessing the parking and EV charging facilities. As demonstrated in Appendix C Pedestrian Safety Measures Plan, operation platforms will be provided at the rear of the parking spaces for users accessing the EV charging facilities. The platforms are separated from vehicular traffic and provides adequate and safe operational space for the users. Wheel stoppers will be installed to ensure vehicles are properly positioned within the parking space and to maintain a clear separation between parked vehicles and the operation platforms. "Beware of Vehicles" signage will be installed at appropriate locations adjacent to the platforms to alert users to potential vehicular movements when accessing or leaving the EV charging facilities, thereby enhancing pedestrian safety and reducing the risk of vehicle-pedestrian conflicts. The land between the Application Site and Long Yat Road is Government Land outside the Application Site. It is currently occupied mainly by man-made slope features. The local access road is outside the Application Site and remains unchanged in terms of access, usage, management and maintenance responsibilities. The Applicant will address any relevant comments, as appropriate, upon receipt. Noted.

(Last updated 16 September 2026)

Appendix A Site Photos

Site Photos of the Application Site
(taken on 9 September 2026)



Appendix B

Letter from Lands Department

電話 Tel : 2443 3496
圖文傳真 Fax : 2473 3134
電郵地址 Email : leyllde2_1@landsd.gov.hk
本處檔號 Our Ref. : (5) in DLOYL 36/YSC/2026
來函檔號 Your Ref.:
來函請註明本署檔號
Please quote our reference in your reply



地政總署
元朗地政處
DISTRICT LANDS OFFICE/
YUEN LONG
LANDS DEPARTMENT

我們矢志努力不懈，提供盡善盡美的土地行政服務
We strive to achieve excellence in land administration.

新界元朗橋樂坊二號元朗政府合署七樓至十一樓
7/F - 11/F, YUEN LONG GOVERNMENT OFFICES
2 KIU LOK SQUARE, YUEN LONG, N.T.

網址 Web Site: <https://www.landsd.gov.hk/>

面呈

繆先生：

查詢有關新界丈量約份第 115 約地段第 104 號
餘段內之相關政府土地已登記寮屋資料

你於 2026 年 3 月 4 就題述事宜的來信已收悉。本處現給你詳細回覆如下。

根據現行寮屋管制政策，寮屋屬於非法佔用政府土地或位於私人農地上的違契構築物。於 1982 年獲登記的寮屋，雖獲發寮屋編號，但其非法性質不變。如構築物的位置、尺寸、建築物料及用途與 1982 年寮屋管制登記紀錄相符，便可獲「暫准存在」，直至因發展計劃、環境改善或安全理由而須予以清拆，或直至自然流失(例如構築物無人佔用或不再存在)而被取締。已登記寮屋不許擴建、新建、加建、改變用途或改用與寮屋管制登記紀錄不符的物料，否則會喪失登記資格，寮屋管制登記紀錄亦會被取消。已登記寮屋獲「暫准存在」的安排，並不涉及任何法律權利、權益或義務，亦不授予任何人佔用土地的權利。

就你提交的證明文件，本處現向你提供有關該已登記寮屋資料表列如下：

已登記寮屋 編號	建築物料	長 x 闊 x 高 (呎)	用途
TT/69	鐵/木	33 X 12 X 13	人住屋 (1/F)
	鐵/木	33 X 11 X 10	禽舍 (G/F)

TT/70	鐵/木	21 X 3 X 8	簷蓬
TT/71	鐵/木	26 X 12 X 10	禽舍及廚房 (G/F)
	鐵/木	9 X 4 X 13	禽舍及廚房 (1/F)
TSL/X/1237	鐵/木	6 X 11 X 7	禽舍
TSL/X/1238	鐵/木	6 X 9 X 7	廚房
TSL/X/1239	鐵/木	6 X 4 X 6	浴室
TSL/X/1293	鐵/木	12 X 8 X 7	車棚

請注意，本回覆並不能視作政府接納任何佔用人以此信件作為有權佔用該已登記寮屋的憑據。

如有任何疑問，請於辦公時間致電 2443 3496 與地政主任張女士聯絡。

元朗地政專員

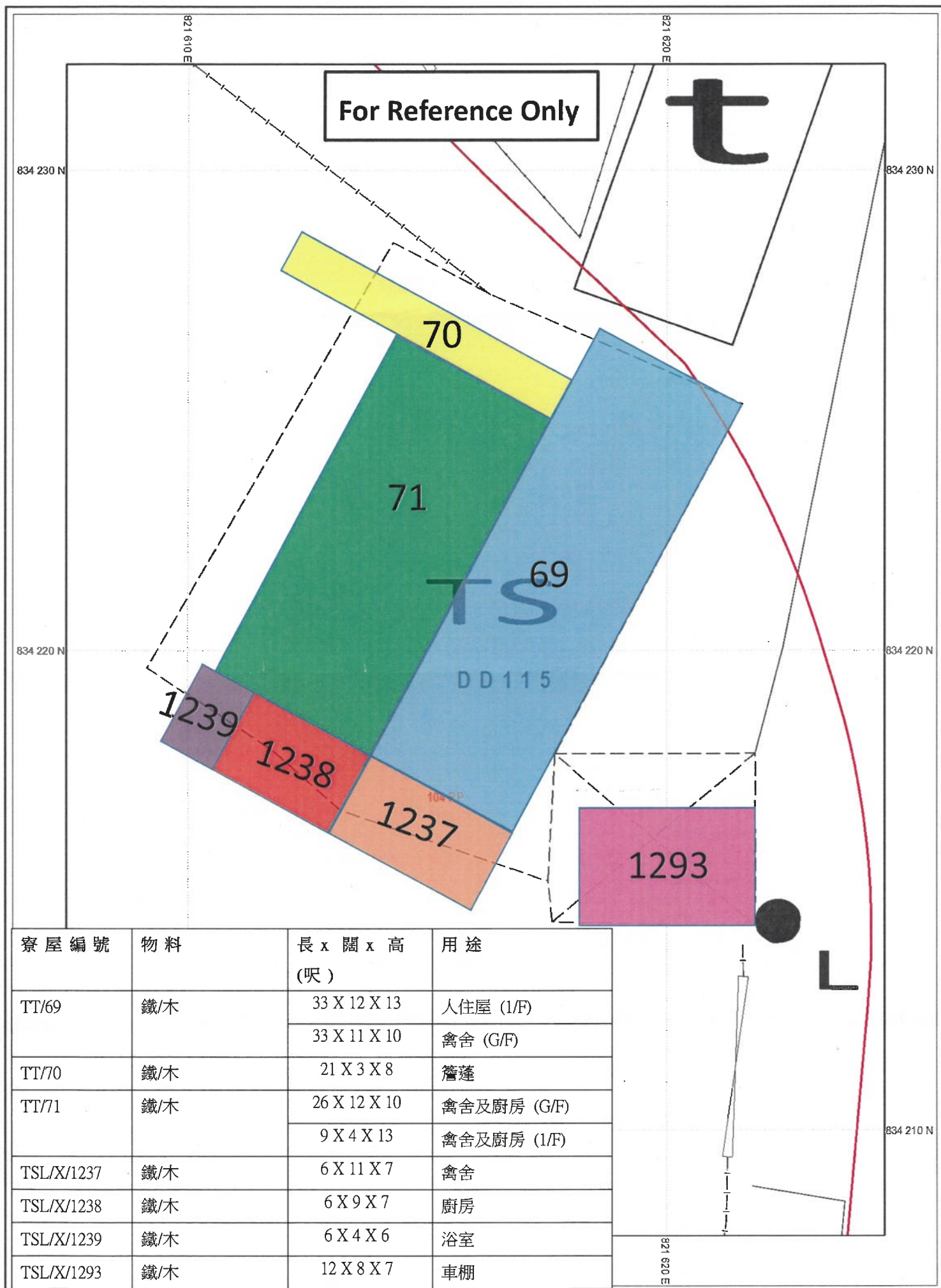
(張杰茵



代行)

2026年4月2日

本處檔號.: DLOYL 36/YSC/2026



Appendix C Pedestrian Safety Measures Plan

Figure 1 - Pedestrian Safety Measures

