



Date: 3rd June 2026

Pages: 1 + Attachments

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

BY EMAIL

Dear Sir/Madam,

**SECTION 12A APPLICATION
TOWN PLANNING ORDINANCE (CHAPTER 131)**

**Amendment to the Approved Lam Tei and Yick Yuen Outline Zoning Plan No. S/TM-LTY/14, to
rezone the application site from “Residential (Group C)” and “Residential (Group D)” to
“Government, Institution or Community (2)”, Lot 827 RP in D.D. 130 and adjoining Government
land (GL), Lam Tei, Tuen Mun, New Territories**

Town Planning Application No. Y/TM-LTY/12 - Submission of Further Information (1)

References are made to the email dated 22nd May 2026 from the Planning Department in relation to technical comments from various departments.

In order to address the comments, please find attached the copy of the response-to-comment (R to C) table (in response to SWD, EPD, DSD and FSD) with the Revised Sewerage Impact Assessment (**Appendix 1**).

Should you have any queries with this submission, please feel free to contact Mr. Jeffrey Kwok and Mr. Kin Leung at [REDACTED] or the undersigned at [REDACTED]

Yours faithfully,
FOR AND ON BEHALF OF
DeSPACE (INTERNATIONAL) LIMITED



Greg Lam

12A Application (No. Y/TM-LTY/12) for Amendment to the Approved Lam Tei and Yick Yuen Outline Zoning Plan No. S/TM-LTY/14, to rezone the application site from “Residential (Group C)” and “Residential (Group D)” to “Government, Institution or Community (2)”, Lot 827 RP in D.D. 130 and adjoining Government land (GL), Lam Tei, Tuen Mun, New Territories

Response-to-Comment Table

Departmental Comments		Responses
Email dated 22nd May 2026:		
Comments from SWD		
	<u>Licensing Perspective</u> A. General	
1.	The intended RCHD has to be complied with:- (a) The licensing requirements as stipulated in the Residential Care Homes (Persons with Disabilities) Ordinance, Cap. 613, its subsidiary legislation and the latest version of Code of Practice for Residential Care Homes (Persons with Disabilities) [CoP(RCHD)] and all relevant prevailing Ordinances, Regulations;	Noted with thanks.
	(b) Codes of Practice enforcing in Hong Kong such as the Buildings Ordinance (Cap.123) (BO) and its subsidiary legislations; Code of Practice for Fire Safety in Buildings (2011) (FS Code), Design Manual: Barrier Free Access (2008) (DM),	Noted with thanks.
	(c) Practice Notes for Authorized Persons, Registered Structural Engineers and Registered Geotechnical Engineers (PNAP), and	Noted with thanks.
	(d) The requirements of the relevant legislations, statutory plans, land lease conditions, deed of mutual covenant and tenancy agreement, if any.	Noted with thanks.
2.	The issuance of the licence for the RCHD should not be deemed to confer any compliance with other legislations, legal binding documents or any land titles. Paragraph 4.2 of the CoP(RCHD) refers;	Noted with thanks.
3.	The ceiling (ceiling slab or suspended false ceiling or underneath of E&M services) of every room must be situated at a height not less than 2.5m measuring vertically from the floor or not less than 2.3m measuring vertically from the floor to the underside of any beam as stipulated in the paragraph 4.4.3 of the CoP(RCHD);	Noted with thanks.
4.	According to the para. 4.9.4 of the CoP(RCHD), every rooms used for habitation (including isolation rooms, staff barrack rooms, sick bay(s) etc.) or for the purposes of office(s) (including auxiliary offices such as warden’s office/reception etc.) or kitchen shall be provided with adequate natural light and ventilation for compliance with Regulations 29 to 33 of Buildings (Planning) Regulations (B(P)R); and	Noted with thanks.

5.	Our detailed comments and requirements will be provided pursuant to an inspection on receipt of the licence application with licensing plans and relevant documents as stipulated in the CoP RCHD.	Noted with thanks.
	B. Fire Safety Aspects	
1.	The Fire Services Installations within the licensed area of the RCHD should be complied with Chapter 5 of the CoP(RCHD);	Noted with thanks.
2.	Under section 21 of the Residential Care Homes (Persons with Disabilities) Ordinance, Cap. 613, an RCHD, including any part of it, must not be situated at height more than 24m above the street level;	Noted with thanks.
3.	For the proposed height of exceeding 24m of the RCHD, as stipulated in the paragraph 5.3.3 of the CoP(RCHD), if an RCHD operator can prove that the RCHD possesses facilities for fire safety, evacuation and rescue, and appropriate evacuation, contingency and fire drill plans to the satisfaction of the DSW, the DSW may approve the ancillary facilities of the RCHD to which the residents normally do not have access (e.g. kitchen, laundry room, office, staff resting room) to be situated at a height more than 24 m above the street level;	Noted with thanks.
4.	Carparking use and other uses, such as, rehabilitation area and lobby, should have adequate fire separation between difference uses;	Noted with thanks.
5.	All required staircases and every exit routes should lead directly to an ultimate place of safety. The final discharge of required staircases at Gridline A-9 and H-9 may not comply with the FS code;	Noted with thanks. The Applicant will ensure the compliance of FS code at the detailed design stage.
6.	Prevention of fire spread between buildings should be complied with Subsection C5 of the FS code, and	Noted with thanks.
7.	Every building should be provided with an Emergency Vehicular Access (EVA) which is so designed and constructed as to allow safe and unobstructed access of a vehicle of the Fire Services Department to the building and to provide for the safe operation of such a vehicle, in the event of a fire or other emergency. Regulation of 41D of Building (Planning) Regulations refers.	Noted with thanks.
	<u>Service Perspective</u> Considering that the implementation of Incentive Scheme of RCHD is to encourage private developers for provision of more service options of residential rehabilitation service in new private development to meet the various needs of person with disabilities, RMD have no adverse comment on the provision of RCHD premises at the subject site by the application from service perspective.	Noted with thanks.
	The applicant's attention is drawn to the below:	

1.	It is unclear about which type of targeted service users of its proposed RCHDs to be operated;	Regarding the targeted services of the proposed RCHD, it is intended to offer comprehensive care for both physically and mentally handicapped individuals, with a flexible range of services to address their diverse needs.
2.	The applicant/operator shall specify the “level of care” of the proposed RCHD in accordance with Code of Practice for Residential Care Homes (Persons with Disabilities);	The level of care of the proposed RCHD will be further determined at the licensing stage. The facility of the proposed RCHD will be operated in accordance with the standards of high-level nursing care services, and its design has been developed with this objective in mind to ensure optimal service delivery.
3.	The applicant/operator shall ensure that the design and construction as well as facilities of the proposed RCHD shall comply with all relevant licensing and statutory requirements including but not limited to (i) Residential Care Homes (Persons with Disabilities) Ordinance (Cap. 613) [Ordinance]; (ii) Residential Care Homes (Persons with Disabilities) Regulation (Cap.613A); and (iii) Code of Practice for Residential Care Homes (Persons with Disabilities). In connection to the RCHD licence application, the applicant/operator is required to apply for a temporary licence before obtaining a completion document if required by the Licensing Office of Residential Care Homes for Persons with Disabilities of the Social Welfare Department;	Noted with thanks.
4.	The applicant/operator shall ensure that the use of the subject location/premises for operation of an RCHD complies with relevant planning and land lease conditions;	Noted with thanks.
5.	The proposed RCHD shall incur no financial implication, both capital and recurrent, on the Government; and	Noted with thanks.
6.	There is no guarantee and commitment that residential care places of any RCHD, including the proposed RCHD, would be purchased by SWD under Bought Place Scheme.	Noted with thanks.
Email dated 22nd May 2026:		
Comments from EPD		
	Please find our 1st batch comments from sewerage impact perspective for follow up: Comments on the SIA	
1.	Please advise the expected intake year.	The expected intake year is 2031.
2.	Section 4 – Table:	

	(a) the numbers of person for the proposed development should be 320.	Revised. Please see the Revised SIA in Appendix 1.
	(b) the peaking factor of 8 should be adopted.	Revised. Please see the Revised SIA in Appendix 1.
	(c) Please revise the peak flow accordingly.	Revised. Please see the Revised SIA in Appendix 1.
3.	Figure 1, please indicate the catchment A, and relevant segments (S1 to S4).	Revised. Please see the Revised SIA in Appendix 1.
4.	Appendix 1	
	(a) Table 1, the peaking factor and peak flow should be revised.	Revised. Please see the Revised SIA in Appendix 1.
	(b) Table 2, please include sewage generated from Botania Villa and the clubhouse of GreenView.	Revised. Please see the Revised SIA in Appendix 1.
	(c) Table 4, some of the information was not tallied with our records, please obtain the updated drainage plan from DSD, and revise the calculation accordingly. For example, the pipe length of FWD1016422 should be 13.8m, the pipe diameter of FWD1016424 should be 0.3m.	Revised. Please see the Revised SIA in Appendix 1.
	(d) Table 4, please review the calculation of sewer capacity, and provide the excel file for our checking.	Noted. The excel file will be further provided.
5.	The hydraulic calculation for further downstream sewers should be conducted, such that sewage generated from the proposed and existing developments including the elderly home development by Pok Oi Hospital and the Sherwood, are considered.	Noted. Please see the Revised SIA in Appendix 1.
6.	Please seek DSD's technical advice, as its approval should be obtained prior to the implementation of the proposed sewerage connection.	Noted with thanks.
Email dated 22nd May 2026:		
Comments from DSD		
a.	Section 4	
	(i) The text states 320 residents, whereas the table shows 280 residents. Please clarify.	Revised. Please see the Revised SIA in Appendix 1.
	(ii) The peaking factor in the table is 6, while Remarks indicate a peaking factor of 8 for population below 1,000. Please clarify.	Revised. Please see the Revised SIA in Appendix 1.
b.	Figure 1	
	(i) The proposed terminal manhole was missing from the layout plan. Please provide. Please be reminded that the invert level (I.L.), disconnecting trap level (D.T.L.L.), cover level (C.L.) and the type of terminal manhole for the proposed terminal manhole should also be provided.	Revised. Please see the Revised SIA in Appendix 1.
	(ii) Further to comment (b)(i) above, an additional sewerage manhole (without disconnecting trap) shall also be provided on government land as close as possible to the lot boundary if practicable by the project proponent to clearly demarcate the maintenance responsibility of the drainage connection pipe and to facilitate drainage related	Revised. Please see the Revised SIA in Appendix 1.

	maintenance works. Please provide.	
	(iii) The invert levels of the existing manholes were missing from the layout plan. Please provide in accordance with DSD convention (i.e. A1, A2, ..., X1, X2, ... etc.)	Revised. Please see the Revised SIA in Appendix 1.
	(iv) Please indicate the sizes of the proposed sewer and the existing sewers in the layout plan.	Revised. Please see the Revised SIA in Appendix 1.
	(v) The "Catchment Area A" mentioned in Table 3 was missing from the layout plan. Please supplement.	Revised. Please see the Revised SIA in Appendix 1.
c.	Appendix 1 – Table 1 (i) Please clarify whether no. of beds is equivalent to no. of residents. Should they be equivalent, the no. of beds stated in Table 1 is 320 while the Table in Section 4 shows 280 residents. Please clarify such discrepancy.	No. of beds is equivalent to no. of residents. Table 1 is revised.
	(ii) The peaking factor in the Table is 6, while Remarks of the Table in Section 4 indicates a peaking factor of 8 for population below 1,000. Please clarify.	Revised. Please see the Revised SIA in Appendix 1.
d.	Appendix 1 – Table 4	
	(i) Remarks(3) mentioned that the calculation assumed clayware pipes. Please be advised that polyethylene pipes should generally be used for sewer connections. Proposals for using pipes of alternative materials should be submitted for agreement. Reference should be made to DSD Sewerage Manual. In this regard, please review and state the pipe material of the proposed sewer in the SIA report.	Noted. Please see the Revised SIA in Appendix 1.
	(ii) In accordance with Section 5.1.3 of DSD Sewerage Manual (Part 1), the maximum velocity at peak flow shall be limited to 3.0 m/s. In the table, the proposed sewer between "Proposed Development" and FMH1015065 shows a velocity of 4.8413 m/s, which exceeded 3.0 m/s. Please review.	Revised. Please see the Revised SIA in Appendix 1.
e.	Please extend the assessment further downstream, at least up to manhole no. FMH1024442 near Fuk Hang Tsuen Road Garden Playground on Fuk Hang Tsuen Road, for completeness of the report.	Noted. Please see the Revised SIA in Appendix 1.
f.	The SIA report needs to meet the satisfaction of SIG/EPD, the planning authority of sewerage infrastructure.	Noted with thanks.
2.	The applicant should also be reminded for our general comments below: –	
(a)	The applicant should be advised that the limited desk-top checking by Government on the drainage proposal covers only the fundamental aspects of the drainage design which will by no means relieve his obligations to ensure that (i) the proposed drainage works will not cause any adverse drainage or environmental impacts in the vicinity; and (ii) the proposed	Noted with thanks.

	<p>drainage works and the downstream drainage systems have the adequate capacity and are in good conditions to accommodate all discharge water collected from his lot and all upstream catchments. The applicant shall effect any subsequent upgrading of these proposed works and the downstream drainage systems whenever necessary.</p>	
(b)	<p>The application site is within an area where connections to existing public stormwater drainage and sewerage networks are available in the vicinity. A copy of our drainage record is attached for your reference (refer to the following URL: https://www.dsd.gov.hk/EN/Files/Legend_BW.pdf for legend of drainage record plans). Please note that the information shown on the record drawings are subject to verification on site and no guarantee can be given that this is a complete record. The lot owner should be asked to verify the actual site conditions by subsurface explorations. Should the applicant choose to connect his proposed drainage systems to DSD's networks, they shall furnish me with their connection proposals for agreement. Upon acceptance of the connection proposals, the applicant shall carry out the proposed connection works in accordance with DSD Standard Drawings at the resources of the applicant. The connection pipe located downstream of the terminal manhole and outside the lot boundaries shall be handed over to DSD for maintenance after satisfactory technical audit by DSD or self-certification by registered professional as appropriate. The location of the terminal manhole shall be designed and constructed close to the lot boundary as far as practicable. The applicant is reminded to submit a duly completed Form HBP1 together with a cheque to DSD for either a technical audit by DSD or self-certification by registered professional at the applicant's cost on the completed connection works. The applicant is also reminded to submit a duly completed declaration form (Form HBP1_CC) and to provide latest approved and certified as-built drainage plans as well as relevant construction records to DSD at least 9 days before each technical audit by DSD. The applicant may refer to DSD Advice Note No.2 – How to make Drainage Connections which is available on DSD's homepage."</p>	Noted with thanks.
(c)	<p>The applicant should check and ensure that the existing drainage system to which the proposed connection will be made have adequate capacity and satisfactory condition to cater for the additional discharge from the captioned lot. He should also ensure that the flow from this site will not overload the existing drainage system.</p>	Noted with thanks.
(d)	<p>The applicant should consult DLO/TM of LandsD and seek agreement from relevant owners for any drainage works to be carried out outside his lot boundary before commencement of the drainage works.</p>	Noted with thanks.
(e)	<p>The applicant should make good all the adjacent affected areas upon the completion of</p>	Noted with thanks.

	the drainage works.	
(f)	The applicant is reminded that he is required to maintain his drainage facilities/system properly and rectify them if they are found to be inadequate or ineffective during operation. The applicant shall also be liable for and shall indemnify claims and demands arising out of any damage and/or nuisance caused by failure of his facilities/system.	Noted with thanks.
3.	This is a coordinated reply from the Mainland North Division and Land Drainage Division of DSD.	Noted with thanks.
Email dated 22nd May 2026:		
Comments from FSD		
1.	Detailed fire safety requirements will be formulated upon receipt of a formal submission of Short Term Tenancy or Short Term Waiver, general building plans or referral of the application via the relevant licensing authority.	Noted with thanks.
2.	The provision of emergency vehicular access in the subject work shall comply with the requirements as stipulated in Section 6, Part D of the Code of Practice for Fire Safety in Buildings 2011.	Noted with thanks.