



DeSPACE (International) Limited

Date: 25th September 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-LTTY/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-LTTY/12 - Submission of Further Information (3)

This submission supersedes the previous submissions dated 18 September 2026 and 23 September 2026, and the submissions made at 11:44 a.m. and 2:36 p.m. on 24 September 2026.

References are made to the emails dated 17th June 2026, 23rd July 2026, 28th July 2026 and 4th August 2026, 10th August 2026 and 11th August 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 PlanD, TD, DSD and EPD) with the appendices below:

- Appendix 1 – Revised Sewerage Impact Assessment
- Appendix 2 – Revised Environmental Assessment
- Appendix 3 – Revised Visual Appraisal
- Appendix 4 – Revised Planning Statement
- Appendix 5 – Revised Traffic Impact Assessment
- Appendix 6 – Revised Development Scheme

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



S12A Application (No. Y/TM-LTYT/12) for Amendment to the Approved Lam Tei and Yick Yuen Outline Zoning Plan No. S/TM-LTYT/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 17th June 2026:		
Comments from EPD		
	<u>EPD comments on revised SIA(FI-01)</u>	
1.	Table 2 – (a) the existing development should include the sewage generated from Fuk Hang Tsuen (for Catchment C), Botania Villa and its clubhouse (for Catchment B), Sherwood (for Catchment E), the POH Elderly Home Development and the POH Day Care Centre for Elderly (Catchment D), and the planning application (A/TM-LTYT/249-3). Please revise other relevant Sections.	Noted and revised. Please refer to Attachment 1 : Revised Sewerage Impact Assessment.
	(b) according to our record, the ADWF for the POH Elderly Home Development should be 387.4m ³ /d.	Noted.
2.	Table 3 - (a) the peaking factor for segment S9 to S15 should be 5.	Noted and revised. Please refer to Table 3: Total Estimated Peak Flow of the revised Sewerage Impact Assessment.
	(b) the discharge points for Catchments D and E are not tallied with those shown in Table 4.	Noted and revised. Please refer to Table 3: Total Estimated Peak Flow and Table 4: Sewer Capacity Check of the revised Sewerage Impact Assessment.
3.	Figure 1, the legend is not correlated to the Figures, please revise and indicate all the catchments and Site boundary.	Noted and revised. Please refer to Appendix 1: Sewerage Network Plan of the revised Sewerage Impact Assessment.
Comments from DSD		
	<u>Specific Comments</u>	
(i)	RtC item (b)(i) has not yet addressed our comment. Invert levels (I.L.), disconnection trap invert level (D.T.I.L.), cover level (C.L.) and type of terminal manhole for the proposed terminal manhole were still missing. Please provide in Figure 1 – Sewerage Network Plan.	Noted. Please refer to Appendix 1: Sewerage Network Plan and Appendix 2: Type of Proposed Terminal Manhole of the revised Sewerage Impact Assessment.

(ii)	RtC item (b)(ii) refers. It is noted that the applicant has addressed the comment by providing an additional manhole on government land as illustrated in Figure 1 – Sewerage Network Plan. However, details such as the type of manhole, I.L. and C.L. were missing, and the proposed additional manhole was missing from the calculations. Please provide the details and review the calculations.	Noted. Please refer to Appendix 3: Type of Proposed Standard Manhole and Table 4: Sewer Capacity Check.
(iii)	Further to comment (ii) above regarding the proposed additional manhole, the manhole should be located as close to the lot boundary as possible. Please review the location of the proposed additional manhole.	Noted. Please refer to Appendix 1: Sewerage Network Plan of the revised Sewerage Impact Assessment.
(iv)	RtC item (b)(iv) has not yet fully addressed our comment. Please indicate the pipe sizes of the proposed & existing sewerage pipes in Figure 1 – Sewerage Network Plan.	Noted. Please refer to Appendix 1: Sewerage Network Plan of the revised Sewerage Impact Assessment.
(v)	Table 2 of Appendix 1 refers. Catchment C is missing from the calculation. Please review and supplement.	Noted. Since Catchment C is the proposed development which has been calculated in Table 1. Please refer to the revised Sewerage Impact Assessment.
(vi)	Table 4 of Appendix 1 refers. The “Estimated Sewage Flow (L/s)” for segment S5,6,7,8,9 does not tally with the “Estimated Peak Flow (L/s)” in Table 3 – Total Estimated Peak Flow. Please review.	Noted. Please refer to Attachment 1 : Revised Sewerage Impact Assessment.
2.	The applicant should observe the general comments given in items 2(a) to 2(f) of our preceding memo ref. (01FMQZ) in MN 10/TM/DD130/0 dated 20 May 2026 (copy attached) which are still applicable.	Noted.
2.	The applicant should also be reminded of 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 drainage works and the	Noted.

	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.	
	(b) The application site is within an area where connection to existing public sewerage network is 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 sub-surface explorations. Should the applicant choose to connect his proposed drainage system to DSD's network, they shall furnish me with their connection proposal for agreement. After obtaining my agreement, the applicant shall submit a duly completed Form HBP1 with a crossed cheque covering the technical audit fee and a plan showing the details of the proposed drainage connection works to this Division for formal application for the required connection. Upon my acceptance of the connection proposal/application, 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	Noted.

	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.	
	(c) 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.	Noted.
	(d) 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.	Noted.
	(e) The applicant should make good all the adjacent affected areas upon the completion of the drainage works.	Noted.
	(f) The applicant is reminded that he is required to	Noted.

	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 indemnity claims and demands arising out of any damage and/or nuisance caused by failure of his facilities/system.	
3.	This is a coordinated reply from the Mainland North Division and Land Drainage Division of DSD.	Noted.
Email dated 23rd July 2026: Comments from EPD		
	Waste management	
1.	Section 6.2.2, please include the following regulations / guidelines: - ETWB TC(W) No. 22/2003 and 22/2003A, Additional Measures to Improve Site Cleanliness and Control Mosquito Breeding on Construction Sites - CEDD's Project Administration Handbook for Civil Engineering Works	Added Accordingly. Please refer to Attachment 2 : Revised Environmental Assessment.
2.	Section 6.5.2, please revise the estimated amount of general refuse generated, 320 person should be used for calculation. Please also advise the staff-to-patient ratio.	Revised Accordingly. Staff-to-patient ratio is also provided.
	Land Contamination	
1.	Relevant information shall be obtained from relevant Government departments, such as EPD, FSD, LandsD etc., for the latest update on the availability of land use status and records of land contamination and / or spillage for the site.	Relevant information is included in S7.6.3 and Appendix 7.4.
2.	Appendix 7.2, for site photo (Photo 8), there are some marks on the ground, please advise whether there is any oil leakage.	The marks observed on the ground were identified as water stains. A follow-up site visit was conducted on 12 August 2026, during which no oil stains or evidence of oil leakage was observed. An additional photo (photo 8) has been provided in Appendix 7.2.
	Air Quality	
1.	Please follow up and confirm with TD the Fuk Hang Tsuen Road is local distributor.	TD has confirmed that Fuk Hang Tsuen Road is regarded as a Local Distributor.

Email dated 28 th July 2026: Comments from PlanD		
	Visual Appraisal (VA)	
1.	It is noted that the VA has supplemented the photomontages for an OZP compliance scheme. Please also supplement associate review/discussion on the proposed development against the existing condition or the newly added OZP compliance scheme.	Noted. Please refer to Attachment 3 : Revised Visual Appraisal.
	Specific Comments	
2.	Comment No. 4 – please supplement in the planning statement on the rationale on proposing to include a minor relaxation clause in the new “G/IC(2)” zone.	Noted. Please refer to Attachment 4 : Revised Planning Statement.
3.	Comment No. 8 – please confirm if relevant technical assessments (e.g. TIA and SIA) had taken into account the estimated number of visitors for these events.	The relevant technical assessments did not take into account the estimated numbers of visitors for these events. Visitor numbers are not considered necessary assumptions for assessment purposes.
4.	Comment No. 13 – Noted the applicants have yet reached any agreement with Pok Oi Hospital and there is no change to Paragraph 5.3. Please review the accuracy of Paragraph 5.3 in the planning statement.	Noted. Please refer to Attachment 4 : Revised Planning Statement.
5.	Please supplement the clarification on the proposed activities/programs to the proposed development as presented in the R-to-C table in the planning statement.	Noted. Please refer to Attachment 4 : Revised Planning Statement.
Email dated 4 th August 2026: Comments from DSD		
	RtC item (i) and Figure 2 refer. It is appreciated that you have provided the levels and type of manhole for the proposed terminal manhole. However, the “X1” and “DTIL” are both presented as +13.17mPD for the proposed terminal manhole. Please note that a 150mm difference between I.L. and D.T.I.L. should be maintained with reference to government standard. In this regard, please review the levels.	Noted and revised. Please refer to Attachment 1 : Revised Sewerage Impact Assessment.
	RtC item (ii) and Figure 2 refer. It is noted that you have selected Type C for the proposed additional manhole on government land. However, manhole type C should be used for depth less than 1000mm while the depth of such proposed	Noted. The type of proposed additional manhole will be revised from Type C to Type D. Please refer to the attached Appendix for the details of Standard Manhole Type D.

additional manhole has exceeded 1000mm. Please review the type of manhole.																																											
Figure 2 refers. The X1 of FMH1015065 is presented as +12.83mPD while the A1 of the downstream FMH1015066 is presented as +12.85mPD. Such levels do not tally with our drainage record and would lead to sewage backflow issue. Please review.	Noted and revised. Please refer to Attachment 1 : Revised Sewerage Impact Assessment.																																										
Appendix 4 – Detailed Calculations of Sewage Generation and Hydraulic Capacity: -																																											
The velocity from proposed terminal manhole to proposed additional manhole is 8.8m/s, which exceeded the maximum velocity stipulated in Sewerage Manual Part 1 Section 5.1.3. Please review	Noted and revised. Please refer to Attachment 1 : Revised Sewerage Impact Assessment.																																										
I refer to the DSD drainage record, the pipe materials of the sewers are listed below, the adopted ks value (0.3mm) is incorrect. Please adopted the ks value for clayware (3mm) /concrete (6mm) based on Table 5: Recommended Roughness Values in Sewerage Manual. <table><tr><th colspan="2">Manhole Reference</th><th>Pipe materials</th></tr><tr><th>Upstream</th><th>Downstream</th><th></th></tr><tr><td>FMH1015065</td><td>FMH1015066</td><td>clayware</td></tr><tr><td>FMH1015066</td><td>FMH1015067</td><td>concrete</td></tr><tr><td>FMH1015067</td><td>FMH1015068</td><td>clayware</td></tr><tr><td>FMH1015068</td><td>FMH1015069</td><td>clayware</td></tr><tr><td>FMH1015069</td><td>FMH1015070</td><td>clayware</td></tr><tr><td>FMH1015070</td><td>FMH1015071</td><td>clayware</td></tr><tr><td>FMH1015071</td><td>FMH1015770</td><td>clayware</td></tr><tr><td>FMH1015770</td><td>FMH1017771</td><td>clayware</td></tr><tr><td>FMH1017771</td><td>FMH1017772</td><td>clayware</td></tr><tr><td>FMH1017772</td><td>FMH1015773</td><td>clayware</td></tr><tr><td>FMH1015773</td><td>FMH1024441</td><td>clayware</td></tr><tr><td>FMH1024441</td><td>FMH1024442</td><td>clayware</td></tr></table>	Manhole Reference		Pipe materials	Upstream	Downstream		FMH1015065	FMH1015066	clayware	FMH1015066	FMH1015067	concrete	FMH1015067	FMH1015068	clayware	FMH1015068	FMH1015069	clayware	FMH1015069	FMH1015070	clayware	FMH1015070	FMH1015071	clayware	FMH1015071	FMH1015770	clayware	FMH1015770	FMH1017771	clayware	FMH1017771	FMH1017772	clayware	FMH1017772	FMH1015773	clayware	FMH1015773	FMH1024441	clayware	FMH1024441	FMH1024442	clayware	Noted and revised. Please refer to Attachment 1 : Revised Sewerage Impact Assessment.
Manhole Reference		Pipe materials																																									
Upstream	Downstream																																										
FMH1015065	FMH1015066	clayware																																									
FMH1015066	FMH1015067	concrete																																									
FMH1015067	FMH1015068	clayware																																									
FMH1015068	FMH1015069	clayware																																									
FMH1015069	FMH1015070	clayware																																									
FMH1015070	FMH1015071	clayware																																									
FMH1015071	FMH1015770	clayware																																									
FMH1015770	FMH1017771	clayware																																									
FMH1017771	FMH1017772	clayware																																									
FMH1017772	FMH1015773	clayware																																									
FMH1015773	FMH1024441	clayware																																									
FMH1024441	FMH1024442	clayware																																									
Email dated 10th August 2026: Comments from EPD																																											
Section 2, please advise materials adopted for the proposed sewerage pipe.	Noted. The pipe materials of the proposed sewage pipe will be clayware.																																										

Section 4, the peak flow shown on Table was wrong, it should be 7.9L/s.	Noted and revised. Please refer to Attachment 1 : Revised Sewerage Impact Assessment.
Appendix 4,	
Table 1 – the peak flow should be 7.9L/s.	Noted and revised. Please refer to Attachment 1 : Revised Sewerage Impact Assessment.
Table 3 – the peak factor adopted for segment (S2, S3, S4 S5) should be 6, and revise the total estimated peak flow accordingly.	Noted and revised. Please refer to Attachment 1 : Revised Sewerage Impact Assessment.
Table 4 – noted that some of the ks values adopted were incorrect, please refer to the Sewerage Manual.	Noted and revised. Please refer to Attachment 1 : Revised Sewerage Impact Assessment.
Email dated 11th August 2026:	
Comments from EPD	
Please find our remaining comments (noise impact).	
1. Re. RtC. Item(4) – Previously provided comment has not been fully addressed. Please replace all instances of “Fixed Plant Noise Impact” with “Fixed Noise Sources Impact”	Revised accordingly.
2. S.3.4.1 – Please review whether “3.1g” should be replaced by “3.1h”	Revised accordingly.
Email dated 11th August 2026:	
Comments from TD	
As checked for the updated Figure 2.8 and Chapter 5 of TIA, Transport Operations (New Territories) Division (TONT) would like to obtain the breakdown of PT routes (including: bus routes and any GMB routes) for Table 2.3. Other than that, no further comments from TONT.	TABLE 2.3 OCCUPANCY OF EXISTING PUBLIC TRANSPORT SERVICES OPERATING NEAR THE SUBJECT SITE

Direction	AM Peak			PM Peak		
	No. of Passenger		Occupancy [c]=[b]/[a]	No. of Passenger		Occupancy [f]=[e]/[d]
	Capacity [a]	Occupied [b]		Capacity [d]	Occupied [e]	
To other districts						
KMB 53	240	90	38%	240	120	50%
KMB 63X	480	270	56%	240	60	25%
KMB 68A	480	300	63%	360	210	58%
KMB 258A	240	120	50%	0	0	0%
KMB 258P	480	60	13%	0	0	0%
KMB 261P	120	60	50%	0	0	0%
KMB 960P	720	420	58%	0	0	0%
KMB 960X	720	120	17%	0	0	0%
LWB A34	360	30	8%	120	0	0%
NLB B2	360	180	50%	360	210	58%
Total	4,200	1,650	39%	1,320	600	45%
From other districts						
KMB 53	240	90	38%	240	120	50%
KMB63X	240	90	38%	360	210	58%
KMB 68A	360	210	58%	600	420	70%
KMB 258P	0	0	0%	240	60	25%
KMB 960P	0	0	0%	480	180	38%
KMB 960X	0	0	0%	360	30	8%
LWB A34	0	0	0%	480	30	6%
NLB52	480	270	56%	360	240	67%
Total	1,320	660	50%	3,120	1,290	41%