

宋梓華
Sung Tze Wah
FRICS FHKIS MSISV MCIREA ACI Arb R.P.S.(GP)

吳恆廣
Ng Hang Kwong, BBS
FRICS FHKIS R.P.S.(GP)
Honorary World Valuer (WAVO)

宋樹鴻
Sung Shu Hung
FRICS MHKIS R.P.S.(GP)(PD) MCIREA
MHIREA BSc (Hons)

Consultant :

劉志光
Lau Chi Kwong
FRICS FHKIS ALS MHKIS
R.P.S.(LS)(PFM) MSc

李霧儀
Lee Mo Yi
MPIA RPP MUDD BA (Hons)

林桂金
Daniel K.K. Lam
MRICS MHKIS MCIREA R.P.S.(GP) BSc

趙慧姿
Chiu Wai Chi
MRICS MHKIS MSc BBus (MK1g)

陳志凌
Elwyn C. Chan
RPE PMgr CEnv FIHE FCI OB MICE
MHKIE MSOE FCI Arb MSc

潘孝維
Pun How Wai
B.Arch.HK RIBA

By Email and Post

Date : 6 February 2026
Your Ref.: TPB/A/NE-LYT/868
Our Ref. : LDS/PLAN/7221

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

Dear Sir/Madam,

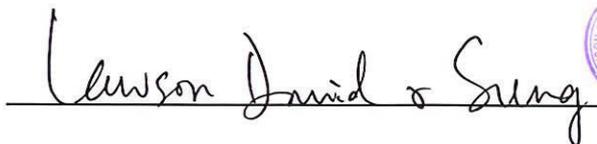
**Application for Planning Permission for
Proposed Temporary Warehouse for Storage of Construction Materials and Associated
Filling of Land for a Period of 3 Years at Lots 1445 S.B ss.2, 1445 S.B RP, 1489, 1490, 1492
and 1494 in D.D. 76 and Adjoining Government Land, Ng Uk Tsuen, Sha Tau Kok Road,
Ma Mei Ha, Fanling, N.T.**

(Application No. A/ NE-LYT/868)

We refer to the comments from various Government departments and the public on the captioned application and submit herewith our response in **Table 1** for your consideration.

Should there be any queries, please contact our Ms. Cannis Lee or Ms. Yancy Fung at [REDACTED]

Yours faithfully,
For and on behalf of
Lawson David & Sung Surveyors Limited





Encl.

c.c. DPO/STN (Attn.: Mr. Peter Ngan) – By Email only
Client

Table 1: Responses to Comments from Government Departments on Planning Application No. A/NE-LYT/868 (6 February, 2026)

COMMENTS		RESPONSES	
1.	Transport Department (Contact Person: Mr. POON Chi Hang, Gary; Tel: 2399 2549)		
(1)	Please clarify whether the removable bollards installed at the existing site entrance will be maintained under the current application.	(1)	The bollards will be removed by the Applicant during construction and operation stage.
(2)	Please clarify whether there will be a gate installed at the site entrance. If so, please ensure that such access arrangement will not cause queuing of vehicles outside the application site (the Site).	(2)	A door gate will be installed at the entrance to the site. However, it will remain open during operating hours to prevent queuing of vehicles outside the Application Site.
(3)	Due to restriction in sightline and limited space for right-turn movements into and out of the Site, please ensure the vehicular movements into and out of the Site to be left-turn only.	(3)	Noted. All vehicular movements into and out of the Site will be restricted to “Left Turn” only. To alert drivers, a ‘left-turn only’ road sign will be remarked on the entrance of the ground, and a ‘No-right turn’ sign will be posted at the exit to restrict the vehicles leaving the Site to turning left only (see Figure 6 of the Planning Statement).
2.	Lands Department (Contact Person: Mr. HO Kwok Leung, Ken; Tel: 2675 1777)		
(1)	The Site comprises Old Schedule Agricultural Lots 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. The proposed ingress/egress of the Site is required to pass through Government land (GL) but	(1)	Noted.

COMMENTS		RESPONSES	
	no right of access via GL is granted to the Site.		
(2)	Short Term Waiver (STW) and Short Term Tenancy (STT) applications submitted by the same applicants based on the development proposal of the previously approved planning application No. A/NE-LYT/816 is being processed by his office. The STW/STT applications did not tally with the development proposal of this planning application. The applicants should clarify.	(2)	The Applicants submitted STW and STT applications for the erection of the proposed warehouse and the use of Government land following planning approval in 2024 (Planning Application No. A/NE-LYT/816). It is noted that the STW/STT applications are being processed by the LandsD. The Applicants resubmit this application with a revised layout in order to minimise the potential impacts of open storage operations to the surrounding areas. Therefore, the Applicant have consolidated all proposed storage area (both open storage and warehouse) from the last application (No. A/NE-LYT/816) into a single warehouse for storage of construction materials. Should this application be approved, the Applicants will revise the STW/STT applications.
(3)	<p>The following irregularities covered by the subject planning application have been detected:</p> <p>a. <u>Unauthorized structure within Lot 1490 in D.D. 76 covered by the planning application</u> There is an unauthorized structure on Lot 1490 in D.D. 76. The lot owner should immediately rectify the lease breaches and his office reserves the rights to take necessary lease enforcement action against the breaches without further notice</p>	(3)	<p>a. Once this planning application has been approved, the Applicants will build the warehouse in accordance with the proposed layout plan. The existing structure on Lot 1490 in D.D. 76 conflicts with the proposed warehouse and will be demolished by the Applicants.</p>

COMMENTS		RESPONSES	
	<p>b. <u>Unlawful Occupation of GL adjoining the said private lots covered by the planning application</u></p> <p>The GL within the Site has been fenced off/illegally occupied without any permission. Any occupation of GL without Government’s prior approval is an offence under the Land (Miscellaneous Provisions) Ordinance (Cap. 28). His office reserves the rights to take necessary land control action against the illegal occupation of GL without further notice.</p>	b	<p>The existing fencing was erected by the previous occupier at the time of the previous approved application (No. A/NE-LYT/741) and is based on the approved application boundary. In order to provide temporary access for nearby residents, the GL is not fully enclosed. Should this application be approved, the Applicants will appoint a land surveyor to mark out the application boundary on site and adjust the existing fencing accordingly. The Applicants have also applied for an STT to use the GL within the application site, following planning approval in 2024 (Application No. A/NE-LYT/816). It is noted that the STT application is being processed by LandsD.</p>
(4)	<p>If the planning application is approved, the lot owners will need to revise their STW and STT applications to permit the structure erected/to be erected within the said private lots and the occupation of the GL. The STW/STT will be considered by the Government in its capacity as a landlord and there is no guarantee that they will be approved. The STW and STT, if approved, will be on whole lot basis and subject to such terms and conditions including the payment of back-dated waiver fee/rent from the first date of the unauthorized structure was erected and occupation of GL as well as administrative fee as considered appropriate to be imposed by LandsD. Besides, given the proposed use is temporary in nature, only erection of temporary structure(s) will be considered.</p>	(4)	Noted.

COMMENTS		RESPONSES	
(5)	The lot owners should comply with all the land filling requirements imposed by relevant Government departments. GL should not be disturbed unless with prior approval.	(5)	Noted.
(6)	Lot 1490 in D.D. 76 is partly covered by Modification of Tenancy (MoT) for erection of temporary structure. His office reserves the rights to take enforcement action for any irregularities and cancel the MoT as appropriate.	(6)	The temporary structure on Lot 1490 in D.D. 76 will be demolished by the Applicants.
3.	Fire Services Department (Contact Person: Mr. LI Chi Fung; Tel: 2733 5844)		
(1)	In consideration of the design/nature of the proposal, fire services installations (FSIs) are anticipated to be required. Therefore, the applicants are advised to submit relevant layout plans incorporated with the proposed FSIs to his Department for approval. In addition, the applicants should also be advised as follows: a. The layout plans should be drawn to scale and depicted with dimensions and the nature of occupancy; and b. The location of the proposed FSIs to be installed should be clearly marked on the layout plans.	(1)	The fire service installations proposal (FSIs) is attached for approval (see Annex 1).
(2)	However, the applicants are reminded that if the proposed structures are required to comply with the Buildings Ordinance (Cap. 123), detailed fire safety requirements will	(2)	Noted.

COMMENTS		RESPONSES	
	be formulated upon receipt of the formal submission of general building plans.		
4.	Drainage Services Department (Contact Person: Mr. TAI Wai Hin, Wilson; Tel: 3965 8931)		
(1)	The applicants shall submit condition records of the implemented drainage facilities to demonstrate that there will be no adverse drainage impact to the adjacent area.	(1)	Photos of the condition records of the implemented drainage facilities are attached for your reference (see Annex 2).
(2)	The applicants should properly maintain the implemented drainage facilities whether within or outside the Site at his own expense at all times during the planning approval period and to rectify the implemented drainage facilities if they are found inadequate/ineffective during operation.	(2)	Noted.
5.	Comments from Agriculture, Fisheries and Conservation Department (Contact Person: Mr. LAU Yun kwan; Tel: 2150 6931)		
(1)	<u>Nature conservation perspective</u> The applicants should implement measures to protect nearby watercourses from adverse impacts during the construction and operational phases.	(1)	The warehouse will be used primarily for storage purposes, with no workshops, dismantling, packing or repacking activities taking place on the Application Site. The proposed warehouse will not generate a significant amount of refuse. Any refuse and construction waste generated during the construction stage will be disposed of by the Applicants at a public filling area at their own expense. Sewage generated from the Application Site will be treated by septic tank. The Applicants will follow ProPECC PN/1/23 to prevent water

COMMENTS		RESPONSES	
			pollution and will implement the above measures to protect nearby watercourses.
6.	Comments from Landscape Unit, Urban Design & Landscape Section of Planning Department (Contact Person: Mr. CHUI Wai Lun, Martin; Tel: 3565 3947)		
(1)	Care should be taken for the existing trees from proposed use. Approval of the application does not imply approval of tree works such as pruning, transplanting and felling. The applicant is reminded to seek approval for any proposed tree works from relevant departments prior to commencement of the works.	(1)	Noted.
7.	Sha Tin, Tai Po and North District Planning Office of Planning Department (Contact Person: Mr. NGAN Pak Lun, Peter; Tel: 2158 6094)		
(1)	Regarding the pedestrian access along the southwestern boundary of the Site reserved for villagers/residents of Ng Uk Tsuen, the applicants should clarify the opening hours and indicate whether lighting will be provided.	(1)	The pedestrian access will be open 24 hours x 7 days, lighting will be provided for the convenience of the villagers/residents of Ng Uk Tsuen.
(2)	It is noted that the application involves regularisation of filling of land at the Site. The applicants are advised to provide a plan showing the extent and depth of the land filling on-site that needs to be regularised.	(2)	The land filling plan is attached at Annex 3 . The land filling area is about 3,900 sq.m. (excluding the tree planting area).

COMMENTS		RESPONSES	
(3)	Please note that the Town Planning Board Secretariat has received a number of public comments on the application, and some of which expressed objection on the proposed use on traffic/pedestrian safety and fire safety grounds. The applicants shall take note and response to those public comments as appropriate. The public comments are available at the Planning Enquiry Counters of the Planning Department (i.e. 17/F, North Point Government Offices, 333 Java Road, North Point, Hong Kong or 14/F, Sha Tin Government Offices, 1 Sheung Wo Che Road, Sha Tin, New Territories).	(3)	Noted.
(4)	Noting that the Site is the subject of previously approved applications for similar warehouse use and there are public comments expressing concerns on the proposal from fire safety perspective, the applicants may consider to submit a FSIs proposal in support of the current application.	(4)	A FSIs proposal is attached as Annex 1 .
8.	Public Comments		
(1)	Public concerns on traffic flow and road safety issue	(1)	The current application is to consolidate the Applicant's previously approved storage area (including open storage and warehouses) under Application No. A/NE-LYT/816 into a single warehouse for the storage of construction materials. All operations, including loading and unloading, will be conducted within the enclosed structure to address the concerns of nearby residents regarding the potential air, noise and dust impacts of open storage operations on the surrounding areas.

COMMENTS	RESPONSES
	<p>Similar to the previous application, the same parking arrangement is proposed for the current application. The warehouse will be used solely for storage purposes and the stored items will remain stagnant most of the time. Accordingly, it is not expected that the proposed development will generate any additional traffic.</p> <p>The swept path analysis and traffic management measures for this application have been submitted (see paragraph 4.4 of the Planning Statement). According to the swept path analysis for heavy goods vehicles, getting in and out of vehicles will not affect the existing pedestrian crossing with islands or the southbound bus stop on Sha Tau Kok Road – Ma Mei Ha. The run-in/out location does not overlap the bus stop (see Figure 6 of the Planning Statement). All vehicles using the run-in/out will be restricted to turning left only. “Right turn” movements can take place at the nearby roundabout. In addition, drivers have very good visibility from the Application Site; therefore, they can clearly observe buses and green minibuses and take the necessary precautions to avoid conflict with buses and passengers.</p> <p>Onsite staff will be deployed to manage traffic coming in and out of the site, to avoid conflicts between vehicles, pedestrians and passengers. Revolving lights will be installed at the entrance to warn pedestrians when vehicles are entering or exiting. This will ensure that there is no conflict between incoming and outgoing traffic and pedestrian/passenger safety.</p>

COMMENTS		RESPONSES	
(2)	Public concerns on pedestrian safety and provision of foot path	(2)	To address the concerns raised by nearby residents, the Applicants have provided a temporary access connecting Sha Tau Kok Road to the Ng Uk Tsuen village settlement, which is currently being used by villagers and residents. The Applicants have considered the residents' needs and reserved a 24-hour pedestrian access route, about 1.5 metres wide, along the southern boundary of the Application Site. This arrangement is identical to that approved in Application No. A/NE-LYT/816.
(3)	Public concerns on fire safety	(3)	For the previous application (No. A/NE-LYT/816), the Applicant submitted a FSIs proposal, which was approved by the Fire Services Department (FSD). Due to a change in the site layout, the Applicant is submitting a revised FSIs proposal (see Annex 1) with this application. If this application is approved, the Applicant will provide FSIs to the satisfaction of FSD.
(4)	Public concerns on land filling	(4)	The Application Site has been filled with concrete since previous planning approval (No. A/NE-LYT/586). The current application involves the regularisation of the land filling at the Application Site. The Applicants will not conduct any further land filling.

Annex 1

Fire Service Installations Proposal

1. GENERAL

- 1.1 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]"
- 1.2 ALL TUBES AND FITTINGS SHALL BE G.M.S. TO BS1387 MEDIUM GRADE WHERE PIPEWORK UP TO #150mm.
- 1.3 ALL TUBES AND FITTINGS SHALL BE DUCTILE IRON TO BS EN545 K12 WHERE PIPEWORK ABOVE #150mm.
- 1.4 ALL DRAIN PIPES SHALL BE DISCHARGED TO A CONSPICUOUS POSITION WITHOUT THE POSSIBILITY OF BEING SUBMERGED.
- 1.5 ALL PUDDLE FLANGES SHALL BE MADE OF DUCTILE IRON
- 1.6 SMOKE EXTRACTION SYSTEM(S) SHALL NOT BE PROVIDED AS THE AGGREGATE AREA OF OPERABLE WINDOW OF STRUCTURE EXCEEDS 6.25% OF THE FLOOR AREA OF THE COMPARTMENT.
- 1.7 VENTILATION/AIR CONDITIONING SYSTEM NOT TO BE PROVIDED.

2. AUTOMATIC SPRINKLER SYSTEM

- 2.1 AUTOMATIC SPRINKLER SYSTEM SHALL BE PROVIDED AND INSTALLED IN ACCORDANCE WITH LPC RULES FOR AUTOMATIC SPRINKLER INSTALLATIONS INCORPORATING BS EN 12845: 2015 (INCLUDING TECHNICAL BULLETINS, NOTES, COMMENTAR AND RECOMMENDATIONS) AND FSD CIRCULAR LETTER NO. 5/2020. THE CLASSIFICATION OF THE OCCUPANCIES WILL BE ORDINARY HAZARD GROUP III.
- 2.2 ONE 135m³ SPRINKLER WATER TANK WILL BE PROVIDED AS INDICATED ON PLAN. THE TOWN MAIN WATER SUPPLY WILL BE FED FROM SINGLE END.
- 2.3 TWO SPRINKLER PUMPS (DUTY/STANDBY) AND ONE JOCKEY PUMP SHALL BE PROVIDED IN FS PUMP ROOM LOCATED AT EXTERNAL AREA.
- 2.4 SPRINKLER CONTROL VALVE SET AND SPRINKLER INLET SHALL BE PROVIDED AS INDICATED ON PLAN.
- 2.5 A TEST VALVE SHALL BE PROVIDED FOR EACH ZONE OF SPRINKLER PIPE. THIS VALVE SHALL BE AT A CONSPICUOUS POSITION THAT WATER CAN BE DRAINED AWAY EASILY.
- 2.6 ALL SUBSIDIARY STOP VALVES TO BE ELECTRIC MONITORING TYPE.
- 2.7 ALL ELECTRIC TYPE VALVES SHOULD GIVE VISUAL SIGNALS TO FIRE SERVICE MAIN SUPERVISORY CONTROL PANEL TO INDICATE THE STATUS (OPEN/CLOSE) OF THE VALVES.
- 2.8 SECONDARY ELECTRICITY SUPPLY DIRECTLY TIE OFF BEFORE CLP'S INCOMING MAIN SWITCH SHALL BE PROVIDED FOR THE SPRINKLER PUMPS.
- 2.9 THE SPRINKLER SYSTEM DESIGN IS BASED ON THE FOLLOWINGS:
HAZARD CLASS : ORDINARY HAZARD GROUP III
TYPE OF STORAGE : POST-PALLET (ST2)
STORAGE CATEGORY : CATEGORY 1
MAXIMUM STORAGE HEIGHT : 3.5m
SPRINKLER PROTECTION : CEILING PROTECTION ONLY
THE MAXIMUM STORAGE AREAS SHALL BE 50m² FOR SINGLE BLOCK
THE MINIMUM CLEARANCE AROUND EACH SINGLE STORAGE CLOCK : 2.4m

3. FIRE DETECTOR SYSTEM

- 3.1 THE STAND-ALONE FIRE DETECTOR SHALL BE PROVIDED IN ACCORDANCE WITH THE "STAND-ALONE FIRE DETECTOR GENERAL GUIDELINES ON PURCHASE, INSTALLATION & MAINTENANCE [SEP 2021]"
- 3.2 WHERE TWO OR MORE STAND-ALONE FIRE DETECTORS ARE INSTALLED IN AN ENCLOSED STRUCTURE, ALL DETECTORS SHALL BE INTERCONNECTED (EITHER WIRED OR WIRELESSLY) SUCH THAT WHEN ONE OF THE DETECTORS IS TRIGGERED, ALL CONNECTED DETECTORS SHALL SOUND AN ALARM SIMULTANEOUSLY.

4. EMERGENCY LIGHTING

- 4.1 EMERGENCY LIGHTING SHALL BE PROVIDED IN ACCORDANCE WITH "BS 5266-1 :2016 AND BS EN 1838 :2013", AND THE FSD CIRCULAR LETTER NO. 4/2021, COVERING ALL AREA. EMERGENCY LIGHTINGS SHALL BE BACKED UP BY BUILT-IN BATTERY AND CAPABLE OF MAINTAINING FUNCTION OF NOT LESS THAN 2 HOURS IN CASE OF POWER FAILURE

5. EXIT SIGN

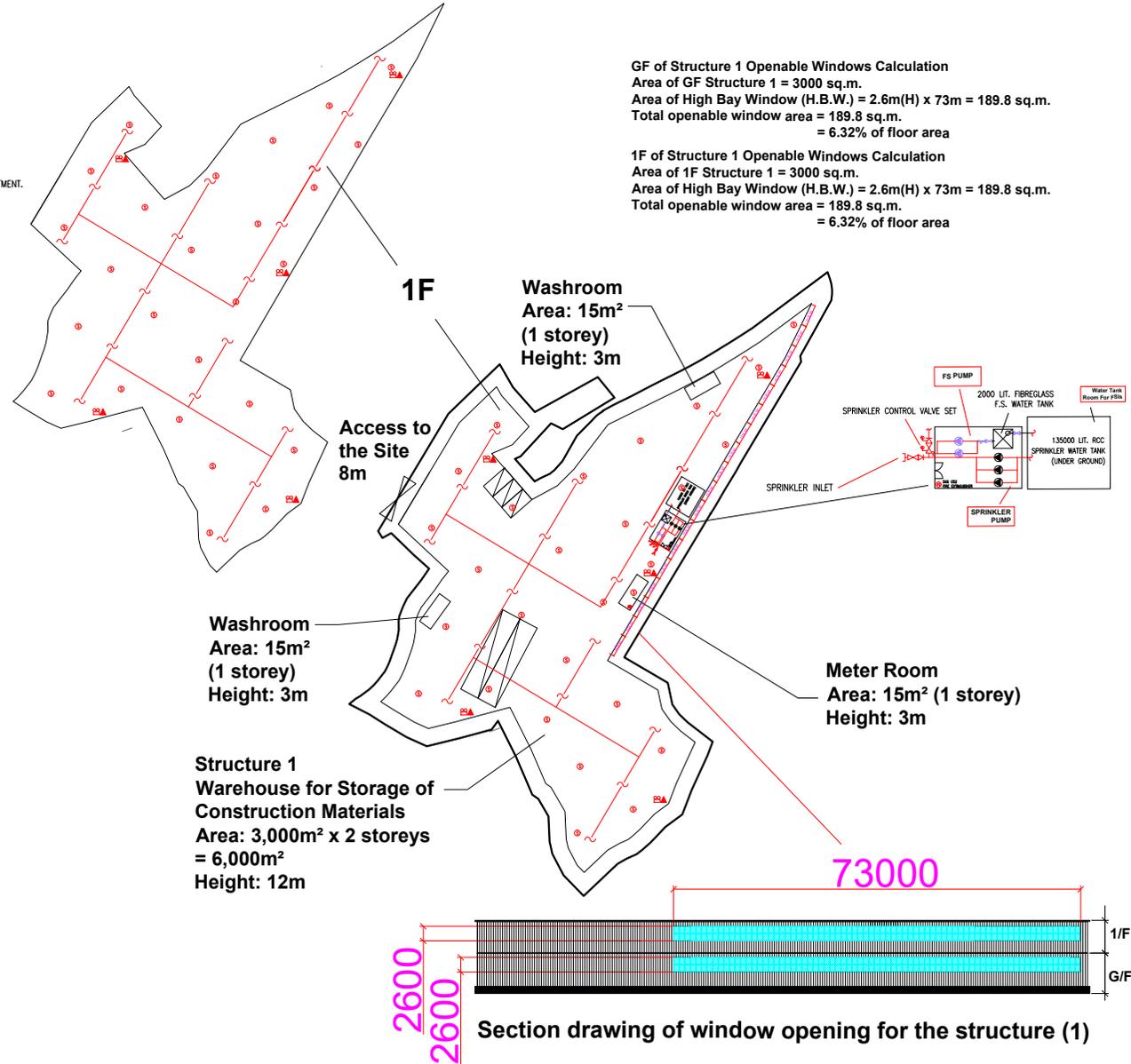
- 5.1 ALL EXIT SIGNS/DIRECTIONAL EXIT SIGNS SHALL BE PROVIDED IN ACCORDANCE WITH BS 5266-1 :2016 AND FSD CIRCULAR LETTER NO. 5/2008, FOR THE BUILDING. EXIT SIGNS/DIRECTIONAL EXIT SIGNS SHALL BE BACKED UP BY BUILT-IN BATTERY AND CAPABLE OF MAINTAINING FUNCTION OF NOT LESS THAN 2 HOURS IN CASE OF POWER FAILURE.

6. PORTABLE APPLIANCES

- 6.1 PORTABLE HAND OPERATED APPLIANCES SHALL BE PROVIDED AS INDICATED ON PLAN.
- 6.2 A SUITABLE TYPE OF PORTABLE FIRE EXTINGUISHER 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)
- 6.3 A 20-35 KG WHEELED TYPE DRY CHEMICAL FIRE EXTINGUISHER IN EVERY 500M² ON EVERY FLOOR OF THE PREMISES AND SHALL BE PROVIDED TO ENSURE THAT EVERY PART OF THE PREMISES CAN BE REACHED BY WHEELED TYPE DRY CHEMICAL FIRE EXTINGUISHER FROM A DISTANCE OF NOT MORE THAN 30M

GF of Structure 1 Openable Windows Calculation
 Area of GF Structure 1 = 3000 sq.m.
 Area of High Bay Window (H.B.W.) = 2.6m(H) x 73m = 189.8 sq.m.
 Total openable window area = 189.8 sq.m.
 = 6.32% of floor area

1F of Structure 1 Openable Windows Calculation
 Area of 1F Structure 1 = 3000 sq.m.
 Area of High Bay Window (H.B.W.) = 2.6m(H) x 73m = 189.8 sq.m.
 Total openable window area = 189.8 sq.m.
 = 6.32% of floor area



LEGEND

- (S) STAND ALONE BATTERY TYPE SMOKE DETECTOR
- (EXIT) EXIT SIGN
- ▲ 25KG WHEELED TYPE DRY CHEMICAL FIRE EXTINGUISHER
- EMERGENCY LIGHT
- NON-RETURN VALVE
- ⊗ SPRINKLER CONTROL VALVE SET
- ⊗ GATE VALVE
- ⊗ GATE TYPE (With MONITORING)
- ⊗ PUMP SET
- ⊗ Y-TYPE STRAINER
- ⊗ SPRINKLER INLET
- ⊗ PRESSURE GAUGE
- ⊗ SPRINKLER HEAD (ON PLAN)
- 5KG DRY POWDER FIRE EXTINGUISHER
- ⊗ SUBSIDIARY VALVE / FLOW SWITCH
- ⊗ 5KG CO2 FIRE EXTINGUISHER

PROJECT : Proposed Temporary Warehouse for Storage of Construction Materials for a Period of 3 Years at Lots 1445SBss2, 1445SBRP, 1489, 1490, 1492 & 1494 in DD76	DRAWING TITLE : F.S. Notes, Legend, Fire Service Installation Layout Plan	ARCHITECT :	CONSULTANT :	FIRE SERVICE CONTRACTOR : Century Fire Service Engineering Co., Ltd.	DRAWING NO : FS-01	REV. : 0
		REV	DESCRIPTION	DATE	NAME	DATE
					DRAWN BY : C.K.NG	23 Dec 2025
					CHECKED BY :	
					APPROVED BY :	
					SCALE : 1 : 300 (A0)	
					SOURCE : B.O.O. Ref. BD F.S.D. Ref. FP	

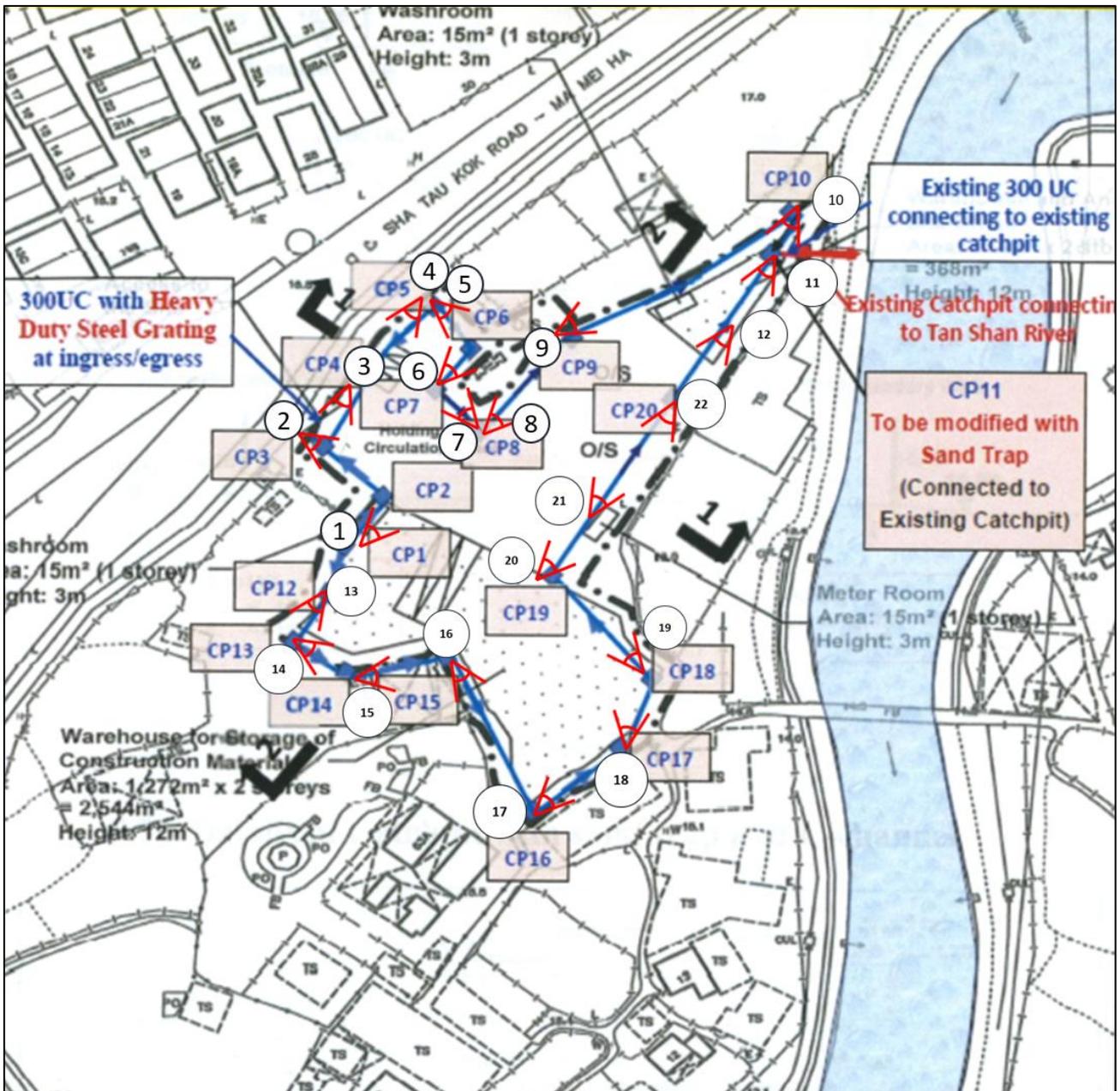
Annex 2

Condition Records of Existing Drainage Facilities

Condition Records of the Implemented Drainage Facilities

(Application No.: A/NE-LYT/868)

Approved Drainage Plan under Application No. A/NE-LYT/816



Viewpoint of Site Photos (VP)

Photos of Existing Drainage Facilities



VP1: CP2 to CP1



VP2: CP3 to CP2



VP3: CP4 to CP3



VP4: CP5 to CP4



VP5: CP5 to CP6



VP6: CP7 to CP6



VP7: CP8 to CP7



VP8: CP8 to CP9



VP9: CP9 to CP10

Photos of Existing Drainage Facilities



VP10: CP10 to CP11



VP11: CP11 to CP20



VP12: CP11



VP13: CP12 to CP13



VP14: CP13 to CP14



VP15: CP14 to CP15



VP16: CP15 to CP16



VP17: CP16 to CP17



VP18: CP17 to CP18

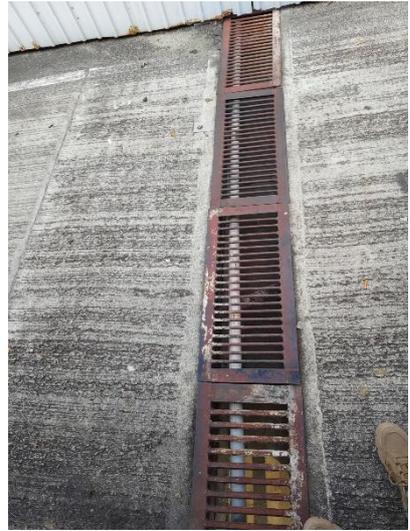
Photos of Existing Drainage Facilities



VP19: CP18 to CP19



VP20: CP19 to CP20



VP21: CP19 to CP20



VP22: CP20 to CP19

Annex 3

Land Filling Plan

