



Date : 26th August, 2026
Our Ref. : ADCL/PLG-10355/L003

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

By Email

Dear Sir/Madam,

**Re: Section 16 Planning Application for Renewal of Planning Approval for Temporary Warehouses (excluding Dangerous Goods Godown) for a Period of 3 Years at Lots 755, 835 S.B ss.1 RP, 836 RP, 837, 838 RP, 841 RP, 842 RP, 844 RP and 854 in D.D.83, No. 31A Ma Liu Shui San Tsuen, Fanling, New Territories
(Planning Application No. A/NE-LYT/880)**

We refer to our submission and the comments received from the relevant departments regarding the subject application. We would like to provide a Response to Comment Table to facilitate considerations by relevant departments and the Town Planning Board.

Thank you for your kind attention and should you have any queries, please do not hesitate to contact the undersigned at 

Yours faithfully,
For and on behalf of
Aikon Development Consultancy Limited

A handwritten signature in black ink, appearing to read "Isa Yuen", written over a horizontal line.

Isa YUEN
Encl.



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Appendix 2	Replacement pages of the Application Form and Planning Statement
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Appendix 1

Response to Comment Table

Section 16 Planning Application for Renewal of Planning Approval for Temporary Warehouses (excluding Dangerous Goods Godown) for a Period of 3 Years at Various Lots in D.D. 83, No. 31A Ma Liu Shui San Tsuen, Fanling

Department	Date	Comments	Responses to Departmental Comments
Transport Department	14.8.2026	Please find the following comments from traffic engineering perspective:	
		1. The approval condition under previous application (No. A/NE-LYT/804) states that 'all vehicles should only be allowed to use the ingress/egress at Dao Yang Road at any time during the planning approval period'. Transport Department (TD) is of the view that the vehicles shall not ingress/egress at Hai Wing Road. In this connection, please update section 4.3.1, Figure 4 to tally with the above and Figure 2 in the Planning Statement.	Noted. All vehicles will only be allowed to use the ingress/egress at Dao Yang Road at any time during the planning approval period. Please refer to the revised Planning Statement and Figure 4.
		2. It is noted that the trip rate of 12 vehicles per day, including 10 trips by light goods vehicle (LGV)/ medium goods vehicle (MGV) and maximum 2 trips by Heavy Goods vehicle (HGV), was proposed under the previous approved planning application. However, it is only mentioned in the Planning Statement that the daily traffic generation is less than 20 vehicles per day. Please clarify whether a maximum trip rate of 12 vehicles per day would be maintained in this application.	A maximum trip rate of 12 vehicles per day would be maintained in the current application.
		3. Please confirm that a maximum of two HGVs is only allowed to enter the application site (the Site) per day, as proposed by the applicant, during the application period.	Currently, a maximum of two trips is made mainly by HGV entering to/getting out of the application site via its ingress/egress at Dao Yang Road. It is anticipated that the traffic generation (HGV) by the proposed use will remain unchanged.
		4. Please check whether the parking and loading/unloading spaces are proposed to be only share-use for MGVs and HGVs according to Table 3 in the Planning Statement.	The parking and loading/unloading spaces are proposed to be shared-use for LGV, MGVs and HGVs only.
		5. Please confirm whether there are no container vehicles entering and exiting the Site during the application period.	It is confirmed that no container vehicles will enter or exit the application site during the application period.
		6. The layout of Hai Wing Road and Dao Yang Road shown in Figure 4 is outdated. Please update the site plan.	Noted. Figure 4 has been revised for clarity.

Section 16 Planning Application for Renewal of Planning Approval for Temporary Warehouses (excluding Dangerous Goods Godown) for a Period of 3 Years at Various Lots in D.D. 83, No. 31A Ma Liu Shui San Tsuen, Fanling

Department	Date	Comments	Responses to Departmental Comments
		7. It is noted that some sections of Dao Yang Road outside the Site are narrow and insufficient to allow two-way traffic for goods vehicles. The applicant should propose mitigation measures to ensure that the vehicles would not clash with opposite traffic when entering and leaving the Site.	Noted. The application site has operated under planning permissions since 2011 for the same nature and operation with no adverse traffic impact. To prevent traffic conflicts, site manager will continue to direct vehicle movements and ensure clear two-way passing before any goods vehicle enters or exits Dao Yang Road. Sign would be erected to alert drivers to drive in a cautious manner.
		8. It is noted that the visibility at the junction between Dao Yang Road and Hai Wing Road is limited to allow drivers/pedestrians from the nearby Hai Wing Road to observe the traffic driving on Dao Yang Road. Please propose measures to ensure that the site vehicles would not clash with vehicles/pedestrians from the Hai Wing Road.	Noted. A convex mirror will be installed near the application site. In addition, operators will be instructed to bring their vehicles to a complete stop at the junction of Dao Yang Road and Hai Wing Road to yield before entering Dao Yang Road. Furthermore, drivers will be required to maintain low speeds.
		9. Please confirm whether all vehicles entering and exiting the Site would still be restricted to non-peak hours (i.e. 10:00 a.m. to 4:00 p.m.) and no operation on Sundays and public holidays would be maintained during the application period.	It is confirmed that all vehicles entering and exiting the application site will remain restricted to non-peak hours (i.e. 10:00 a.m. to 4:00 p.m.), with no operation on Sundays and public holidays during the application period.
		10. Traffic mitigation and control measures should be proposed and implemented to ensure the Site would not cause adverse impact to traffic condition of the nearby roads and safety concerns to the local villagers during the application period.	Noted. To ensure traffic safety and minimize any potential impact on local villagers during the application period, comprehensive traffic mitigation measures will be implemented. The applicant will employ site personnel to direct traffic flow, strictly enforce low speed limits, and install warning signs alongside a convex mirror near the site access. Additionally, all site drivers will be required to bring their vehicles to a complete stop and yield at the junction before proceeding.
		11. Dao Yang Road is not managed by TD. The applicant should obtain consent from relevant land owners and maintenance authorities on using this road.	Noted.
		12. No vehicle is allowed to queue back to or reverse onto/ from public road at any time during the planning approval period.	Noted.

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Department	Date	Comments	Responses to Departmental Comments
Fire Services Department	14.8.2026	Please find the following comments from fire safety perspective: - Shall the applicant declared there is no change of use and layout for this renewal application, a full set of valid Certificate(s) of Fire Service Installation and Equipment (FS 251(s)) covering all the Fire Service Installations (FSIs) installed on the application site shall be submitted for consideration.	There is no change use and layout for this renewal application. A full set of valid FS 251 certificates covering all FSIs on-site will be submitted by way of compliance of approval conditions.
Planning Department	14.8.2026	Please find the following observations from district planning perspective. 1. Please clarify the types of good(s) to be stored at the Site. 2. The applicant shall take note of, and respond to, the public comments received by the Town Planning Board Secretariat.	The application site will continue to be used for low-temperature storage of food and beverage products, such as confectionery, prepared food and staple grains, for trading purposes. No dangerous or hazardous goods will be stored on-site. Noted. To ensure traffic safety and minimize any potential impact on local villagers during the application period, comprehensive traffic mitigation measures will be implemented. The applicant will employ site personnel to direct traffic flow, strictly enforce low speed limits, and install warning signs alongside a convex mirror near the site access. Additionally, operators will be required to bring their vehicles to a complete stop and yield at the junction between Dao Yang Road and Hai Wing Road before proceeding.

Appendix 2

Replacement pages of the Application Form and Planning Statement

(i) Gross floor area and/or plot ratio 總樓面面積及／或地積比率		sq.m 平方米	Plot Ratio 地積比率
	Domestic 住用	N.A. ☐ About 約 ☐ Not more than 不多於	N.A. ☐ About 約 ☐ Not more than 不多於
	Non-domestic 非住用	3,000 ☒ About 約 ☐ Not more than 不多於	0.28 ☒ About 約 ☐ Not more than 不多於
(ii) No. of blocks 幢數	Domestic 住用	N.A.	
	Non-domestic 非住用	11	
(iii) Building height/No. of storeys 建築物高度／層數	Domestic 住用	N.A. m 米 ☐ (Not more than 不多於)	
		N.A. Storeys(s) 層 ☐ (Not more than 不多於)	
	Non-domestic 非住用	7.35 m 米 ☒ (Not more than 不多於)	
		1 Storeys(s) 層 ☒ (Not more than 不多於)	
(iv) Site coverage 上蓋面積	27.6 % ☒ About 約		
(v) No. of parking spaces and loading / unloading spaces 停車位及上落客貨車位數目	Total no. of vehicle parking spaces 停車位總數		5
	Private Car Parking Spaces 私家車車位 Motorcycle Parking Spaces 電單車車位 Light Goods Vehicle Parking Spaces 輕型貨車泊車位 Medium Goods Vehicle Parking Spaces 中型貨車泊車位 Heavy Goods Vehicle Parking Spaces 重型貨車泊車位 Others (Please Specify) 其他 (請列明) (LGV/MGV/HGV)		5
(v) No. of parking spaces and loading / unloading spaces 停車位及上落客貨車位數目	Total no. of vehicle loading/unloading bays/lay-bys 上落客貨車位／停車處總數		5
	Taxi Spaces 的士車位 Coach Spaces 旅遊巴車位 Light Goods Vehicle Spaces 輕型貨車車位 Medium Goods Vehicle Spaces 中型貨車車位 Heavy Goods Vehicle Spaces 重型貨車車位 Others (Please Specify) 其他 (請列明) (LGV/MGV/HGV)		5

2. SITE PROFILE

2.1 Location and Current Condition of the Application Site

- 2.1.1 The application site is located at No. 31A Ma Liu Shui Tsuen with direct access via Dao Yang Road leading to Sha Tau Kok Road (Figure 1). A majority of the application site as indicated per Illustrations 1-I and 1-II is paved and fenced off mainly for the storage of manufacturing materials, trading products and vehicle parts and accessories within the long-established warehouses.

2.2 Surrounding Land-use Characteristics

- 2.2.1 The locality of the application site is generally rural in character, mixed with active and fallow agricultural land, tree groups, rural workshops, warehouses, domestic structures and temporary structures.
- 2.2.2 To the immediate north of the application site is currently being utilized for open storage/workshop uses which was subject to planning applications (Nos. IDPA/NE-LYT/5, DPA/NE-LYT/35, A/NE-LYT/277, 301, 313, 423) approved by the Board. Some domestic structures are found to the northwest of the application site. To the further north of the application site is dominated by various kinds of open storage yard and car repair workshop.
- 2.2.3 Scattered domestic structures and agricultural land are found to the east, south, southeast and southwest of the application site. Warehouses and workshops are also found to the south and west of the application site.
- 2.2.4 In general, while the application site falls mainly within an area zoned "R(C)", the area is dominated by rural industrial uses, such as warehouses, workshops and open storages. The proposed use is thus considered not incompatible with the surrounding areas.

Major Proposed Development Parameters	Last Approved Application (No. A/NE-LYT/804)	Proposed Use (Current Application)	Difference
Operation Hours	From 7:00 a.m. to 8:00 p.m., Monday to Saturday excluding Sunday and Public Holiday (only indoor forklift operation inside the enclosed warehouses between 7:00 p.m. to 8:00 p.m)	From 7:00 a.m. to 8:00 p.m., Monday to Saturday excluding Sunday and Public Holiday (only indoor forklift operation inside the enclosed warehouses between 7:00 p.m. to 8:00 p.m)	No Change
No. of Parking Spaces	5 (LGV/MGV/HGV, 3.5m x 11m)	5 (LGV/MGV/HGV, 3.5m x 11m)	No Change
No. of Loading/Unloading Bays	5 (LGV/MGV/HGV, 3.5m x 11m)	5 (LGV/MGV/HGV, 3.5m x 11m)	No Change
Type of Delivery Vehicles	LGVs, MGVs and HGVs	LGVs, MGVs and HGVs	No Change
No. of Daily Trips by Delivery Vehicles	10 (For LGV & MGV) 2 (For HGV)	10 (For LGV & MGV) 2 (For HGV)	No Change
Width of Ingress/Egress (m)	10 (At Dao Yang Road)	10 (At Dao Yang Road)	No Change
Anticipated Trips Generation	3-4 trips per week (On average)	3-4 trips per week (On average)	No Change

4.2 Operation

4.2.1 The proposed use would continue enabling legal storage for food and beverage (e.g. confectionery) at low temperature within the premises for trading purposes. Goods and products (e.g prepared or preserved meat and cakes) to be stored and transported at consistence and desirable temperatures to preserve the texture and quality and to present from contamination and damage while transiting. The operation of the cold storage would **continue serving food trading purposes**.

4.2.2 All goods to be stored within the application site will be **non-polluted** and **non-dangerous** in nature and will **remain stagnant all the time**. On the whole, all storage activities will only be confined to within the warehouses of the application site without affecting the neighbouring uses and the operation hours of the proposed use will be restricted. There would be no operation between 8:00 p.m. and 7:00 a.m. except indoor forklift operation inside the enclosed warehouses between 7:00 p.m. to 8:00 p.m., and the entire operation is restricted to from Monday to Saturday excluding Sunday and Public Holidays.

4.3 Vehicular Access and Parking Arrangement

4.3.1 The application site is directly accessible via Dao Yang Road leading to Sha Tau Kok Road - Lung Yeuk Tau, which is a well-paved road that is considered sufficient to cater for the traffic of goods vehicles generated by the warehouse's operation within the application site. All vehicles will only be allowed to use the ingress/egress at Dao Yang Road at any time during the planning approval period. Gates are set up at the entrance to prevent vehicles entering to or getting out of the application site outside the operation hours. 5 nos. of parking spaces for Light Goods Vehicles (LGV), Medium

Goods Vehicles (MGV)/ Heavy Goods Vehicles (HGV) and 5 nos. of loading/unloading bays for LGV/MGV/HGV are proposed within the application site for daily operation.

- 4.3.2 The existing daily traffic generation by the proposed use is less than 20 vehicles per day of which a maximum of 2 daily trips made mainly by HGV entering to/getting out of the application site via its ingress/egress at Dao Yang Road. Considering the nature, operation of the proposed use remains unchanged and the site configuration remains almost the same as that in the previously approved application, it is expected that the traffic generation by the proposed use will remain unchanged as well. The Applicant would ensure that Operator would comply with the trips restriction on HGVs. If the trips restriction is not abided by the Operator in any case during the approval period of the current application, the Applicant will issue warning letters or even terminate the tenancy agreement with the Operator. Sufficient maneuvering spaces are allowed within the application site so that no queuing of goods vehicles will occur along Dao Yang Road under any circumstances.

4.4 Provision of Existing Landscape Treatment

- 4.4.1 The existing trees within the application site have been properly maintained and in good condition (**Illustration 2** refers). The Applicant will continue to properly maintain all existing trees during the approval period should the current application be approved by the Board.

4.5 Provision of Existing Drainage Facilities

- 4.5.1 As presented in the drainage condition record dated 10.6.2026 (see **Illustration 3**), the existing drainage facilities are well-maintained and there has been no flooding issue arisen. The Applicant is well committed that the existing drainage provision within the application site will be continued to be properly maintained during the approval period once the current application is approved by the Board.

4.6 Provision of Fire Service Installations

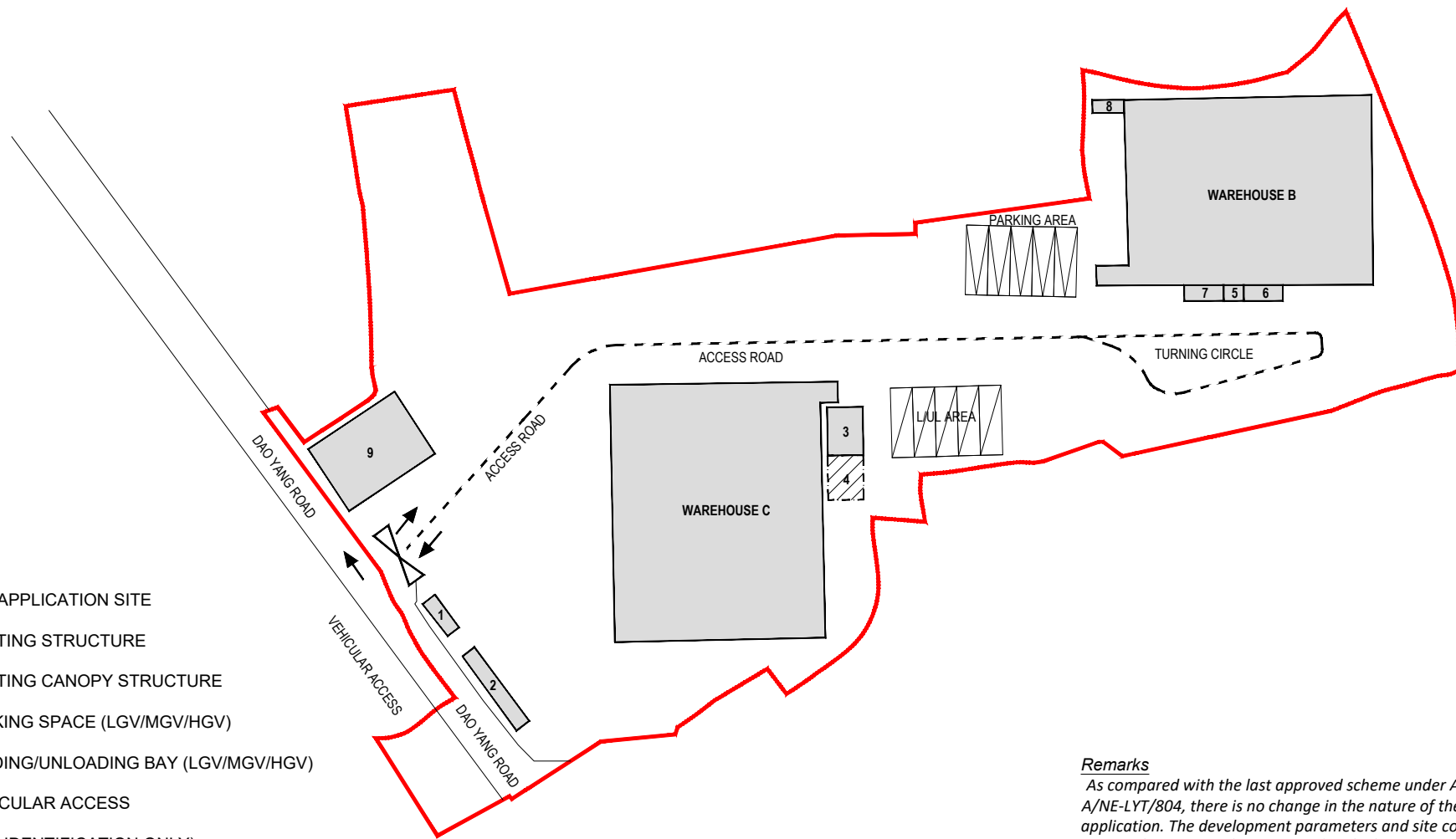
- 4.6.1 The FSI proposal for the current application **shares the same layout as** the previous one submitted on 6.12.2023 and there is no change to site configuration. The Applicant is also committed that the existing fire services installations already implemented on site when complying relevant approval conditions (**Appendix III** refers) laid down per the last planning approval under Application No. A/NE-LYT/804 will be continued to be properly maintained during the approval period once the current application is approved by the Board.

4.7 Environmental Considerations

- 4.7.1 The application site has been occupied for workshop and warehouse purposes and similar use since 2003. It has been maintained and operated effectively, with no significant changes over the years. Under the current application, the operational activities will remain unchanged, consistent with the previous planning approval. In addition, the proposed use is solely for the storage of non-polluted and non-

Appendix 3

Revised Figure 4



Remarks

As compared with the last approved scheme under Application No. A/NE-LYT/804, there is no change in the nature of the current application. The development parameters and site configuration will remain the same as that proposed in the last approved application.

Project:

Section 16 Planning Application for Renewal of Planning Approval for Temporary Warehouses (excluding Dangerous Goods Godown) for a Period of 3 Years at Various Lots in D.D.83, No. 31A Ma Liu Shui San Tsuen, Fanling, New Territories

(Renewal of Planning Approval under Application No. A/NE-LYT/804)

Title:

Layout Plan

Figure:

4

Scale:

Not to Scale

Date:

Aug 2026

Ref.: ADCL/PLG-10355/R001/F004



AIKON DEVELOPMENT CONSULTANCY LTD.