



才鴻顧問有限公司
TOP BRIGHT CONSULTANTS LIMITED

Your Ref.: TPB/A/STT/41

Our Ref.: 26/880/L02

October 2, 2026

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

By Email

Dear Sir/Madam,

Proposed Temporary Warehouse with Ancillary Open Storage of Cables, Wires, Transformers and Spare Parts and Associated Filling and Excavation of Land for a Period of 3 Years in “Other Specified Uses” annotated “Mixed Use” (“OU(MU)”) and “Other Specified Uses” annotated “Amenity Area” (“OU(A)”) Zones and Area shown as ‘Road’ at Lots 733SF(Part), 741(Part), 742RP(Part), 744RP(Part) in D.D.99 and Adjoining Government Land, San Tin, Yuen Long, New Territories

(Application No. A/STT/41)

In response to the departmental comments dated 17.9.2026, we would like to submit herewith our responses to comments for your consideration.

Should you have any queries or require further information, please feel free to contact the undersigned at [REDACTED].

Yours faithfully,
For and on behalf of
Top Bright Consultants Ltd.



Lo Ming Kong

Encls.

c.c. Smart Union Motors (Asia) Company Limited (the Applicant)



Responses to Comments from Government Departments on Planning Application No. A/STT/41

COMMENTS	RESPONSES
A. District Planning Officer/Fanling, Sheung Shui & Yuen Long East, Planning Department (PlanD)	
1. Please clarify the area of open storage as shown on the layout plan.	As shown on the submitted Layout Plan (Figure 5 refers), the area for open storage of cables, wires, transformers and spare parts is about 816m ² .
2. Please clarify the materials used for land filling, as well as the site levels (in mPD) for the excavation and filling works.	Referring to Appendix A of the Planning Statement, the materials used for land filling is concrete. The land filling level is not exceeding +4.3mPD while the excavation level for drainage works is about +2.43mPD - +3.85mPD.
3. Please clarify the area of the proposed filling and excavation works that falls within the respective land use zonings.	The area of the proposed filling works that falls within (i)“Other Specified Uses” annotated “Mixed Use” (“OU(MU)”) zone is about 19.8m ² and (ii) the area shown as ‘Road’ is about 25.2m ² . For the area of the proposed excavation works that falls within (i)“Other Specified Uses” annotated “Mixed Use” (“OU(MU)”) zone is about 22.8m ² and (ii) the area shown as ‘Road’ is about 29.09m ² .
4. Please clarify whether the filling and excavation works have already been completed and whether the application is for the regularization of excavation and filling of land.	The application boundary has been adjusted compared to the previous application (No. A/YL-ST/667). A drainage channel has been proposed along the eastern boundary, as shown in Appendix A of the Planning Statement, and therefore the current application involves the proposed filling and excavation works.
5. Please clarify why there is noise nuisance when no workshop activities will be carried out.	Noise nuisance caused by loading and unloading, as well as vehicular manoeuvring, will be minimised during operation.
6. Please explain how the interface issues with the ongoing land resumption will be resolved.	The Applicant sublets the application site to CLP Power Hong Kong Limited (the operator). After acknowledging that land resumption is underway, the applicant has made best efforts to assist the operator in locating suitable premises to continue operations. The Applicant will maintain close contact with the Lands Department and propose leaving in phases and continuing to operate until the land is genuinely required for works.

COMMENTS	RESPONSES
7. Please clarify whether the entire site has been fenced off with high corrugated metal sheets; if so, please specify the height.	Part of the Application Site is currently fenced off with 2m high corrugated metal sheets. Should this application be approved, the entire site will be fenced off in the same way.
B. District Lands Office, Yuen Long, Lands Department (LandsD)	
1. DLO/YL objects to the application.	
2. The application site (the Site) comprises Government Land (GL) and 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.	Noted.
3. A majority part of the Site falls within the “Resumption of Land for the Development of San Tin Technopole (Phase 1) at Yuen Long (Second Batch)”, in which the land will revert to the Government on 26.9.2026. The remaining part of the Site falls within “Resumption of Land for the Development of San Tin Technopole (Phase 1) at Yuen Long (Third Batch)”, in which the Pre-Clearance Survey (“PCS”) has been conducted. In this regard, this office will not process either regularization or new applications for Short Term Waivers (STW) or Short Term Tenancy (STT) in this case.	Noted.
4. The private lot no. 744 RP in D.D. 99 is covered by STW No. 4045 for the purpose of “Temporary Vehicle Park (including Container	Noted.

COMMENTS	RESPONSES
Vehicles), Container Storage Area, Storage of New Unlicensed Container Tractors, Storage of Construction Materials, Tyre Repair, Shop and Services (Sale of Container Vehicles and the Related Parts/Accessories), Vehicle Repair and Services, and Ancillary Offices, Shop and Services and ancillary uses as may be approved by DLO/YL”.	
5. The GL within the Site is covered by a STT No. STTYL0225 for the purposes of “Temporary Shop and Services and Ancillary Uses as may be approved by DLO/YL”.	Noted.
6. Please note that modification of the STW in paragraph 3 and the STT in paragraph 4 to exclude from the Site will be effective from 26.9.2026.	Noted.
C. Drainage Services Department (DSD)	
1. The following comments on the submitted drainage proposal should be addressed: a) The applicant should demonstrate with hydraulic calculation that the proposed drainage facilities are adequate to collect, convey, and discharge the surface runoff accrued on the application site <u>and the overland flow intercepted from the adjacent lands.</u> External catchment shall be properly considered.	Noted. Should this application be approved, a revised drainage proposal will be submitted to the satisfaction of Drainage Services Department (DSD).

COMMENTS	RESPONSES
b) The site is located just in front of Yan Shau Wai natural watercourse, which is a critical natural watercourse for collecting the surface runoff to adjacent San Tin Stormwater Pumping Station and San Tin Polder (collectively as “San Tin Flood Protection Scheme”). The San Tin Flood Protection Scheme aims at reducing the flood risk of 7 low-lying villages including Tsing Lung Tsuen, Fan Tin Tsuen, On Lung Tsuen, San Lung Tsuen, Tung Chun Wai, Wing Ping Tsuen, and Yan Shau Wai. Therefore, the peripheral surface channels with sufficient drainage capacity, set a level lower than the adjoining lots, should be constructed to collect and convey the runoff.	Noted and have been followed.
c) Please clearly indicate the existing drainage facilities on the proposed drainage plan. Site photos of existing drainage facilities including the discharge point (e.g. from the application site all the way down to the ultimate discharge point) should be provided in order to demonstrate the presence and reflect condition of the existing drainage system. Also, the applicant should provide site photo(s) to demonstrate size of the existing drainage facilities.	Noted. Should this application be approved, a revised drainage proposal will be submitted to the satisfaction of Drainage Services Department (DSD). The applicant is committed to verify the existing drainage on site and modify/reconstruct the drainage where necessary in order to ensure the drainage system being the same as those to be approved under this application.
d) Based on the site observation, the stated opening in the associated site hoarding can't be seen. The applicant shall provide the details of the proposed site hoarding to demonstrate adequate openings have been provided to allow existing overland flow from the adjoining lots to pass through. The applicant shall ascertain	100mm high x 200mm wide openings at 3m centre to centre at the bottom of the fence along the subject site boundary will be created after this planning application is approved.

COMMENTS	RESPONSES
that all existing flow paths would be properly intercepted and maintained without increasing the flooding risk of the adjacent areas (Reference could be referred to Annex A).	
e) The applicant should indicate clearly the proposed and existing ground levels of the application site and ground level of adjacent areas on the drainage plan. Cross sections showing the proposed drainage facilities and existing and proposed ground levels of the applicant site with respect to the adjacent areas should be given.	Noted. Should this application be approved, a revised drainage proposal will be submitted to the satisfaction of Drainage Services Department (DSD).
f) Sand trap or provision alike should be clearly indicated on the proposed drainage plan and provided before the collected runoff is discharged to the existing drainage facilities.	Noted. Should this application be approved, a revised drainage proposal will be submitted to the satisfaction of Drainage Services Department (DSD).
g) The applicant should resolve any conflicts or disagreements with the relevant lot owner(s) and obtain permission from the Lands Department, for laying new drains/channels and/or modifying or upgrading existing ones within other private lots or on Government Land outside the lot boundary. The applicant should also provide written proof that consent has been obtained to construct the drainage system falling outside the captioned lot boundary, and the applicant will maintain all relevant drainage facilities as shown in the submitted drainage proposal.	Noted, agreed and will follow.

COMMENTS	RESPONSES
2. After completion of the required drainage works, the applicant shall provide DSD for reference a set of record photographs showing the completed drainage works with corresponding photograph locations marked clearly on the approved drainage plan. DSD will inspect the completed drainage works jointly with the applicant with reference to the set of photographs.	Noted, agreed and will follow.
3. No public sewerage maintained by DSD is currently available for connection. For sewage disposal and treatment, agreement from Director of Environmental Protection shall be obtained.	Noted, agreed and will follow.
4. All the proposed drainage facilities should be constructed and maintained by the applicant at his own cost. The applicant should ensure and keep all drainage works on site under proper maintenance at all times.	Noted, agreed and will follow.
5. To encourage a higher quality submission of the drainage submission and avoid rounds of comments, thereby shortening the processing time, the applicant is advised to complete the attached checklist (Appendix A). Otherwise, a longer processing time may be required by DSD.	Noted and will follow.

COMMENTS	RESPONSES
D. Environmental Protection Department (EPD)	
1. Considering the “Revised Code of Practice on Handling the Environmental Aspects of Temporary Uses and Open Storage Sites” (CoP), it is noted that the proposed temporary use would involve a) traffic of heavy vehicle, and not involve b) dusty operations. There are residential premises within 100m from the project boundary, and the nearest residential premise is located around 36m to the south-west of the Site.	Noted. The Application Site has been approved for similar use since 2014. For the current application, only medium goods vehicles will be used and there is no environmental complaints in the past.
2. Based on the above, EPD does not support the application from environmental planning perspective.	Noted.
3. Should the application be approved, the applicant is advised to follow the CoP to minimize the potential nuisance to nearby sensitive receivers. On sewage disposal, the applicant is advised that sewage discharge from the site should be directed to nearby public sewer. In case of unavailability of public sewer, the applicant is reminded that proper sewage collection, treatment and disposal facilities should be provided in accordance with the requirements in Professional Persons Environmental Consultative Committee Practice Notes 1/23.	Noted.
4. In addition, EPD has no adverse comment on the associated filling and excavation of land, and the applicant should strictly observe all relevant pollution control ordinances, particularly on waste	Noted.

COMMENTS	RESPONSES
management and disposal, and put in place necessary precautionary/pollution control measures to prevent any pollution/nuisance to nearby sensitive receivers as a result of the construction/operation activities.	
E. North Development Office, Civil Engineering and Development Department (NDO, CEDD)	
1. NDO, CEDD objects to the application.	
2. The Site falls directly upon Road L14 and the Other Specified Uses (Amenity Area) site which are within the area of the San Tin Technopole project. The applied period of 3 years would jeopardize the development programme of Road L14 and the surrounding areas which are planned to commence in 2027 tentatively. Hence, NDO, CEDD does not support the application.	Noted.
F. Railway Development Office, Highways Department (RDO, HyD)	
1. RDO, HyD has reservation on the application. The Site will be directly in conflict with the proposed Chau Tau Station of NOL Spur Line. The Site will be required for the construction of the proposed Chau Tau Station from 2027.	Noted.