R-RICHES PLANNING LIMITED 益卓規劃有限公司

Our Ref. : DD83 Lot 869 S.E & VL
Your Ref. : TPB/A/NE-LYT/883

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

By E-mail

09 November 2026

Dear Sir,

Further Information

Proposed Temporary Shop and Services with Ancillary Facilities and Associated Filling of Land for a Period of 3 Years in "Agriculture" and "Residential (Group C)" Zones,
Various Lots in D.D. 83, Ma Liu Shui San Tsuen, Lung Yeuk Tau, Fanling, New Territories

(S.16 Planning Application No. A/NE-LYT/883)

We write to provide further information in response to departmental and public comments on the captioned application.

Should you require more information, please contact the undersigned at [redacted]. Thank you for your kind attention.

Yours faithfully,

For and on behalf of
R-riches Planning Limited

Christian CHIM
Town Planner

cc DPO/STN, PlanD (Attn.: Mr. Pater NGAN email: pplngan@pland.gov.hk)
(Attn.: Ms. Esther LI email: ehlli@pland.gov.hk)

[redacted]

Response-to-Comment (RtC)

Proposed Temporary Shop and Services with Ancillary Facilities and Associated Filling of Land for a Period of 3 Years in "Agriculture" and "Residential (Group C)" Zones, Various Lots in D.D. 83, Ma Liu Shui San Tsuen, Lung Yeuk Tau, Fanling, New Territories

(S.16 Application No. A/NE-LYT/883)

(i) An RtC table:

	Departmental Comments	Applicant's Responses
1. Comments of the Commissioner for Transport (C for T)		
(a)	It appears that the estimated trip generation/ attraction presented in Table 3 in the supplementary statement does not cover the trips due to the vehicles for displaying. Please advise the types and trip numbers of these vehicles with justification.	The estimated trip generation/attraction presented in Table 3 of the supplementary statement reflects the vehicular trips that would have arisen from the staff and visitors entering/leaving the application site (the Site) during operation hours. The on-site displaying vehicles will be driven into the Site by staff during non-peak hours on an occasional basis, depending on the actual demand and the space availability at the Site. Apart from the figures as illustrated in Table 3 of the supplementary statement, it is anticipated that not more than 2 displaying vehicles will be driven into the Site by staff per hour on an occasional basis.
(b)	Please confirm that only Sha Tau Kok Road – Lung Yeuk Tau via Dao Yang Road and Hai Wai Road will be used for the vehicular access road to and from the application site.	Only Sha Tau Kok Road – Lung Yeuk Tau via Dao Yang Road and Hai Wai Road will be used for the vehicular access road to and from the Site.
(c)	Please confirm that there are no medium goods vehicle, heavy goods vehicles and container vehicles entering and exiting the Site during the application period.	No medium goods vehicles, heavy goods vehicles and container vehicles will enter and exit the Site during the approval period of the planning permission.
(d)	Please supplement swept path analysis for all types of vehicles, including the possible types of vehicles for displaying, showing the satisfactory maneuvering of vehicles entering and leaving the Site via Dao Yang Road and Sha Tau Kok Road – Lung Yeuk Tau.	Please refer to the swept path analyses at **Annex 1**.

(e)	It is noted that some sections of Hai Wing Road and Dao Yang Road along the proposed access route are narrow and insufficient to allow two-way traffic. The applicant should propose mitigation measures to ensure that the vehicles would not clash with opposite traffic when entering and leaving the Site.	Staff will be deployed at the junction of Hai Wing Road and Dao Yang Road to direct incoming/outgoing traffic arisen from visitor to/from the Site. Visitors will be advised to manoeuvre under low speed to ensure road and pedestrian safety, particularly when there is opposite traffic.
(f)	It is noted that the visibility at the junction between Dao Yang Road and Hai Wing Road is limited to allow drivers/pedestrians to observe the traffic driving from the adjacent road. Please propose measures to ensure that the site vehicles would not clash with vehicles/pedestrians from the adjacent road.	Staff will be deployed at the junction of Hai Wing Road and Dao Yang Road to direct incoming/outgoing traffic arisen from visitor to/from the Site. Visitors will be advised to manoeuvre under low speed to ensure road and pedestrian safety, particularly when there is opposite traffic.
(g)	Please note that all vehicles entering and exiting the Site should be restricted to non-peak hours (i.e. 10:00 a.m. to 4:00 p.m.) to minimise impact to the nearby roads during the application period.	Noted.
(h)	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.
(i)	Dao Yang Road and Hai Wing Road is not managed by the Transport Department. The applicant should obtain consent from relevant land owners and maintenance authorities on using this road.	Noted.
(j)	No vehicle is allowed to queue back to or reverse onto/ from Hai Wing Road, Dao Yang Road and public roads at any time during the planning approval period.	Noted.

Departmental Comments		Applicant's Responses
2. Comments of the District Planning Officer/Sha Tin, Tai Po and North, Planning Department (DPO/STN, PlanD)		
(a)	Please provide a breakdown of the usage of the uncovered areas on the Site and clearly delineate the relevant areas on the proposed layout plan. In particular, please clarify the size (in terms of m^2 and %) of the vehicle display area.	The uncovered area will be used for vehicle displaying area, as well as vehicle parking and circulation space. The vehicle displaying area occupies an area of 1,171 m^2 (about), which accounts for 33% (about) of the Site. For details, please refer to the updated layout plan at Plan 1 of **Annex 2**.
(b)	Please specify the types of vehicles to be displayed on-site.	The types of vehicles to be displayed thereon include the ordinary 4-seater electric taxis and the larger premium 6-seater electric taxis.
(c)	Please confirm whether the vehicles on display will be unlicensed. If so, please rectify paragraph 3.7 of the Supplementary Statement accordingly.	The vehicles on display will be either licensed or unlicensed. Please refer to the revised Section 3.7 of the supplementary statement at **Annex 3**.
(d)	Please clarify the target customers of the proposed use.	The proposed development provides taxi rental services for taxi rentee-drivers and renter-owners. Rentee-drivers pay a rental fee to the taxi renter-owners for the use of the vehicle for a specified period of time. Moreover, it also provides electric taxi showroom services for renter-owners (who hold a valid taxi licence) of electric or liquefied petroleum gas taxis who intend to switch to electric taxis, or replace their existing electric taxis.
(e)	Please specify whether the proposed on-site parking spaces are for visitors or staff members.	On-site parking spaces are mainly for staff use. Visitors who require the usage of on-site parking spaces are required to make prior reservation before their visit.
(f)	Please advise on how the display car will be transported to the Site.	Displaying vehicles will be driven into the Site by staff under trade licences.
(g)	Regarding Drawing No. Plan 5, 1) please rectify the zoning annotation for 'Filling of Land Area' from the "REC" zone to the "R(C)" zone; and 2) land filling of the whole Site is proposed which may lead to tree felling. This may be in conflict	1) Please refer to the revised plan showing the filling of land at Plan 2 of Annex 2. 2) No tree as defined under the Lands Administration Office (LAO) Practice Note (PN) No. 6/2023[1] has been identified thereon. No dead, old, or valuable tree has been found either.

[1] *With reference to LAO PN No. 6/2023, a plant is considered to be a tree if its trunk diameter measures 95 mm or more at a height of 1.3 m above the ground level.*

	with the "no tree felling" statement in the Application Form. Please clarify.	As such, no tree felling is involved for the removal of existing vegetation therewithin.
(h)	Please note that the Secretariat of the Board has received a number of public comments regarding the current application. The applicant should take note of these public comments and provide responses as appropriate.	Please refer to Part (ii) below.

(ii) The applicant provides the following information in response to various aspects of the public comments received during the public inspection of the captioned application:

Operational aspect

- the swept path analyses at Annex 1 have demonstrated the smooth manoeuvering of vehicles along the access roads between the Site and Sha Tau Kok Road – Lung Yeuk Tau;

- the proposed development involves the operation of a **vehicle showroom and trading services** for the taxi industry, instead of a public vehicle park. It is not anticipated that the proposed development would attract large number of visitors and vehicular trips in view of its business nature;

- as stated in Section 3.7 of the supplementary statement, no car beauty, washing, cleansing, paint-spaying, repairing, dismantling or other workshop activities will be involved at the Site; and

- referring to the applicant's response to C for T and DPO/STN, PlanD in Part (i) above, all vehicles will be driven into the Site by staff. Moreover, as stated in Section 3.6 of the supplementary statement, no medium or heavy goods vehicles exceeding 5.5 tonnes, including container tractors/trailers, as defined in the Road Traffic Ordinance, are allowed to be parked/stored on or enter/exit the Site. As such, the concerns over the deployment of heavy vehicles along the access roads are not envisaged; and

- referring to the applicant's response to C for T and DPO/STN, PlanD in Part (i) above, staff will be deployed at the junction of Hai Wing Road and Dao Yang Road to direct incoming/outgoing traffic arisen from visitor to/from the Site. Visitors will be advised to manoeuvre under low speed to ensure road and pedestrian safety, particularly when there is opposite traffic. Under proper implementation of the measures, the potential hazard to local road users and pedestrian is expected to be minimum;

Environmental aspect

- it is estimated that the proposed development would only generate/attract a maximum of 6 vehicular trips on an hourly basis during non-peak hours. In view of the low traffic flow and deployment of non-heavy vehicles, the adverse noise and air quality impacts to the surroundings are not anticipated; and

Drainage aspect

- should the application be approved by the Town Planning Board, the applicant will submit a drainage proposal with periphery u-channels and catchpits to alleviate the potential adverse drainage impacts that would have arisen from the proposed development; and

- the applicant will implement good practices under *Professional Persons Environmental Consultative Committee Practice Notes 1/23* when maintaining the on-site drainage system at the Site. Hence, the operation of the proposed development should not induce adverse drainage impacts to the area.

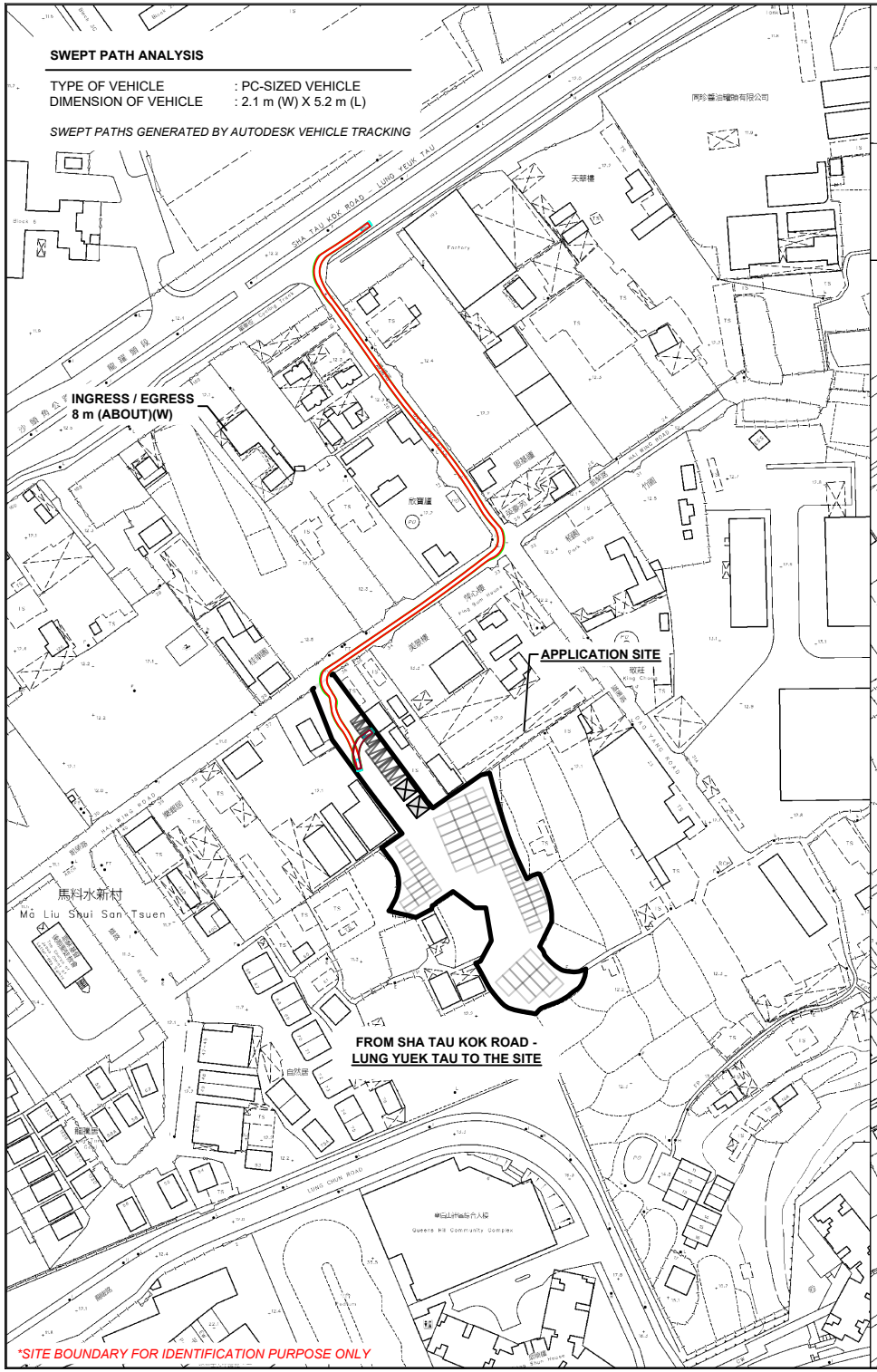
Annex 1

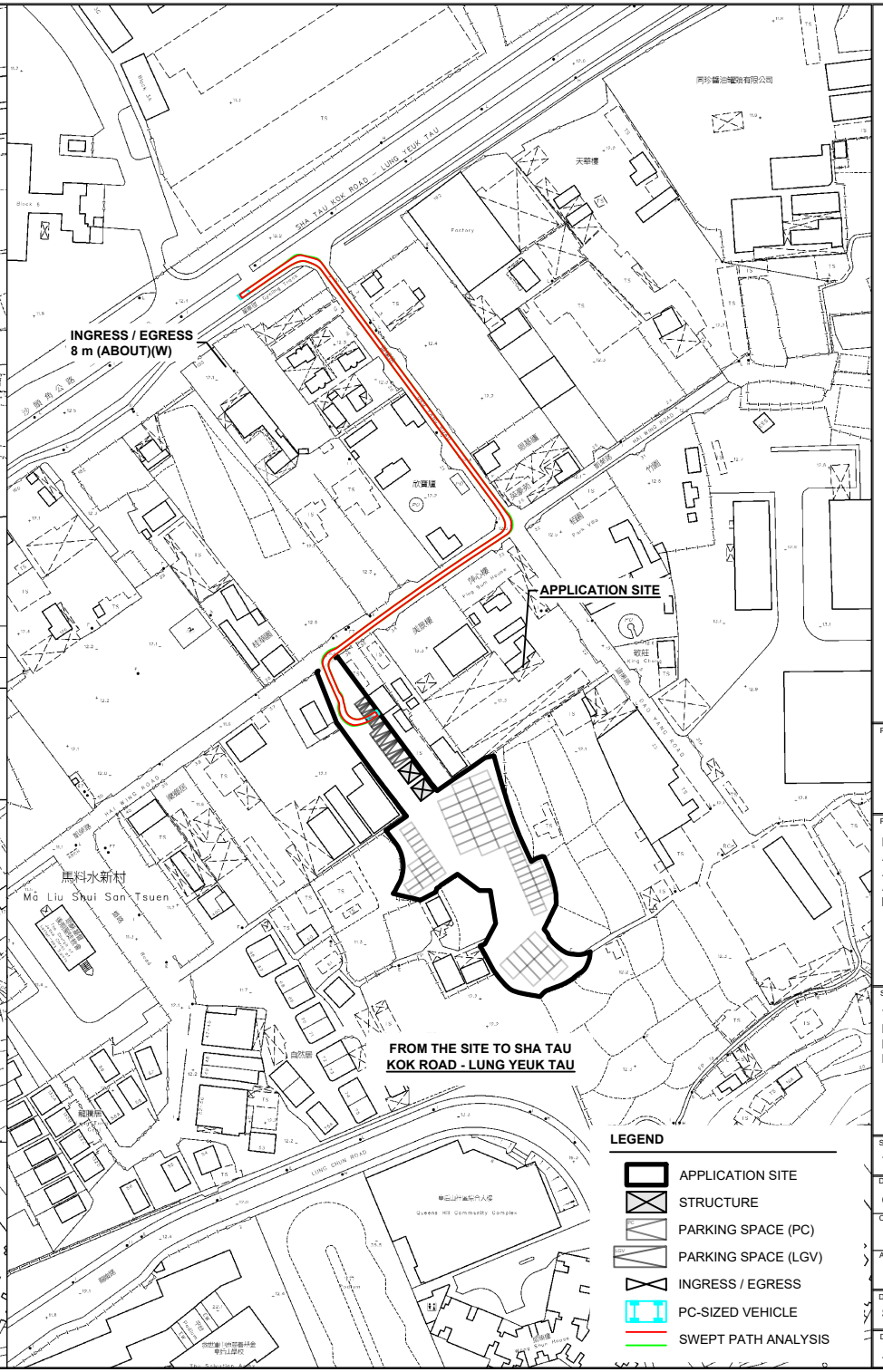
Swept path analysis

SWEPT PATH ANALYSIS

TYPE OF VEHICLE : PC-SIZED VEHICLE
DIMENSION OF VEHICLE : 2.1 m (W) X 5.2 m (L)

SWEPT PATHS GENERATED BY AUTODESK VEHICLE TRACKING





*SITE BOUNDARY FOR IDENTIFICATION PURPOSE ONLY

LEGEND

- APPLICATION SITE
- STRUCTURE
- PARKING SPACE (PC)
- PARKING SPACE (LGV)
- INGRESS / EGRESS
- PC-SIZED VEHICLE
- SWEPT PATH ANALYSIS

NORTH
W E
S

PLANNING CONSULTANT
R-RICHES PLANNING LIMITED

PROJECT
PROPOSED TEMPORARY SHOP AND SERVICES WITH ANCILLARY FACILITIES AND ASSOCIATED FILLING OF LAND FOR A PERIOD OF 3 YEARS

SITE LOCATION
VARIOUS LOTS IN D.D. 83, MA LIU SHUI SAN TSUEN, LUNG YEUK TAU, FANLING, NEW TERRITORIES

SCALE
1 : 2500 @ A4

DRAWN BY	DATE
CC	08.11.2026
CHECKED BY	DATE
APPROVED BY	DATE

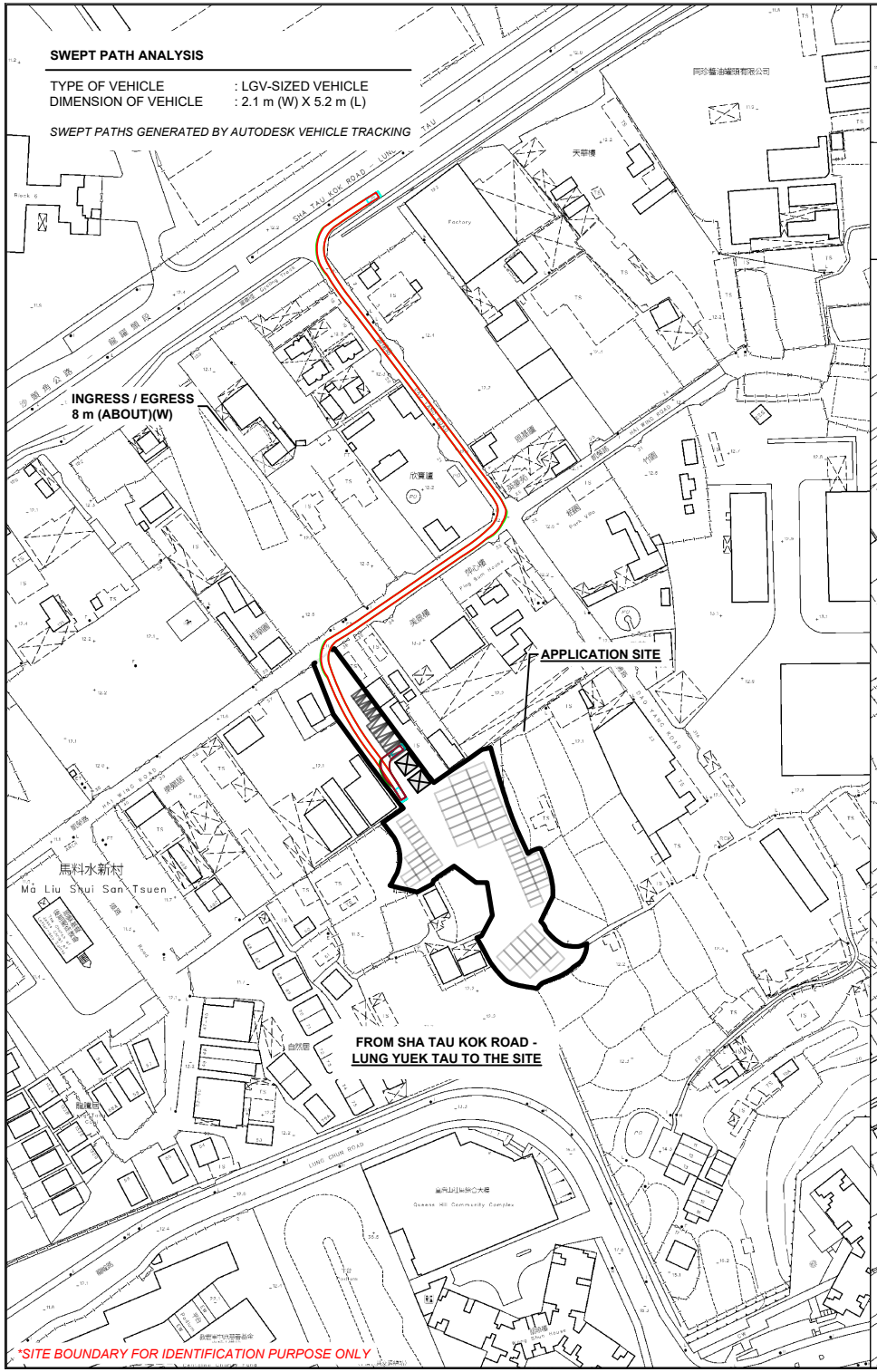
DWG. TITLE
SWEPT PATH ANALYSIS (PC)

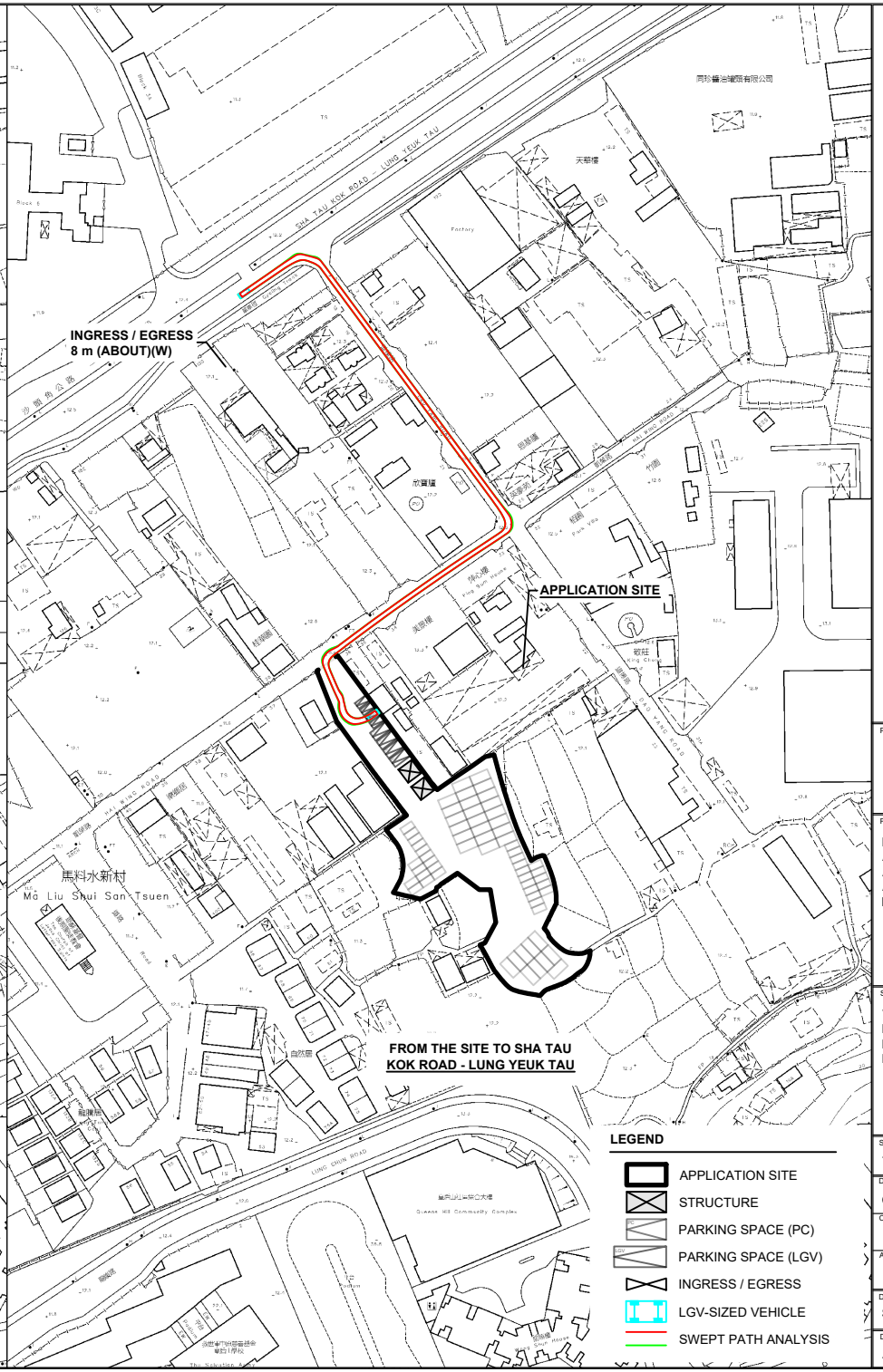
DWG NO.	VER.
ANNEX 1 PLAN 1	001

SWEPT PATH ANALYSIS

TYPE OF VEHICLE : LGV-SIZED VEHICLE
DIMENSION OF VEHICLE : 2.1 m (W) X 5.2 m (L)

SWEPT PATHS GENERATED BY AUTODESK VEHICLE TRACKING





LEGEND

- APPLICATION SITE
- STRUCTURE
- PARKING SPACE (PC)
- PARKING SPACE (LGV)
- INGRESS / EGRESS
- LGV-SIZED VEHICLE
- SWEPT PATH ANALYSIS

NORTH
W E
S

PLANNING CONSULTANT
R-RICHES PLANNING LIMITED

PROJECT
PROPOSED TEMPORARY SHOP AND SERVICES WITH ANCILLARY FACILITIES AND ASSOCIATED FILLING OF LAND FOR A PERIOD OF 3 YEARS

SITE LOCATION
VARIOUS LOTS IN D.D. 83, MA LIU SHUI SAN TSUEN, LUNG YEUK TAU, FANLING, NEW TERRITORIES

SCALE
1 : 2500 @ A4

DRAWN BY	DATE
CC	08.11.2026
CHECKED BY	DATE
APPROVED BY	DATE

DWG. TITLE
SWEPT PATH ANALYSIS (LGV)

DWG NO.	VER.
ANNEX 1 PLAN 2	001

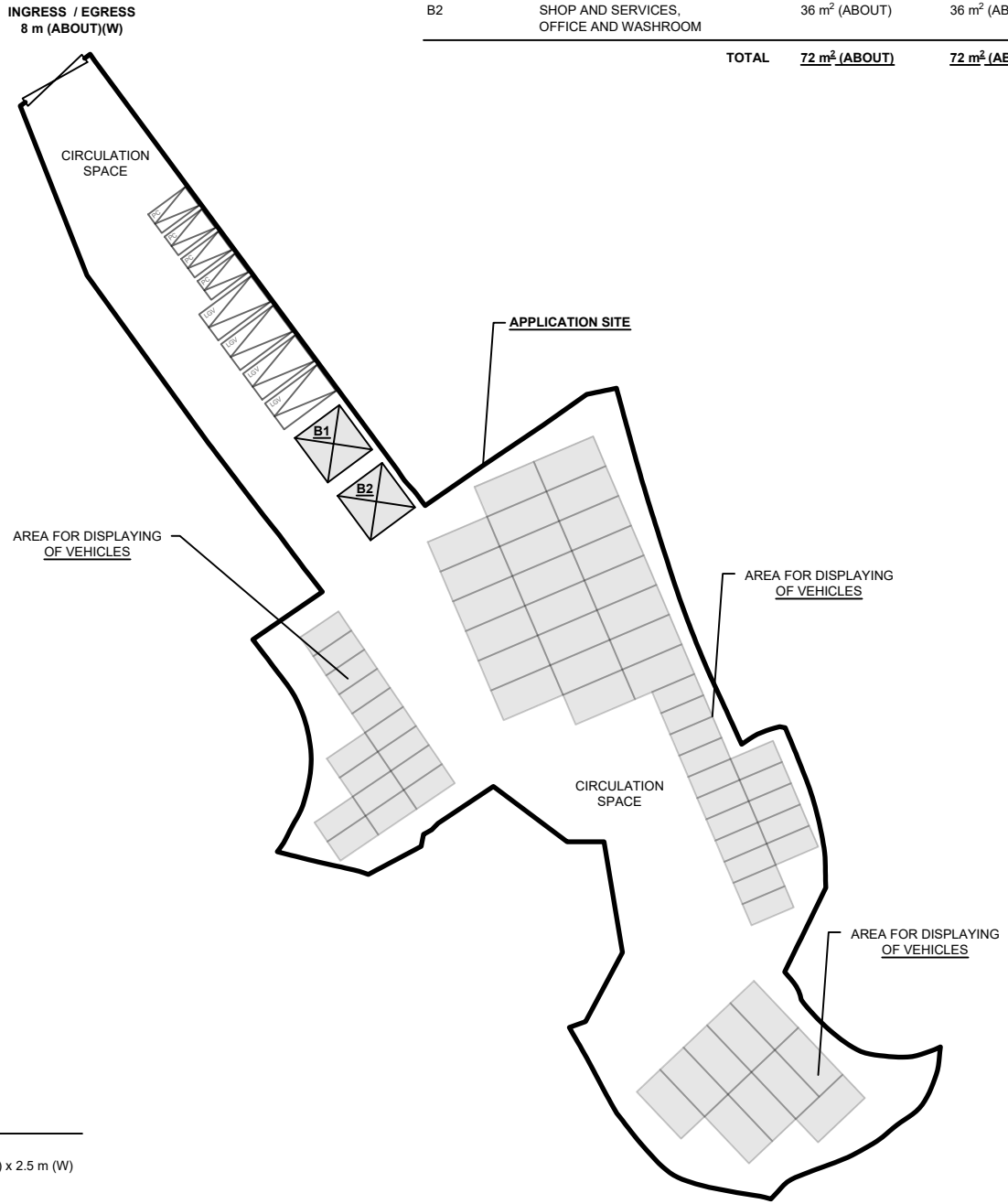
Annex 2

Updated layout plan and plan showing the filling of land

DEVELOPMENT PARAMETERS

APPLICATION SITE AREA	: 3,565 m^2	(ABOUT)
COVERED AREA	: 72 m^2	(ABOUT)
UNCOVERED AREA	: 3,493 m^2	(ABOUT)
PLOT RATIO	: 0.02	(ABOUT)
SITE COVERAGE	: 2 %	(ABOUT)
NO. OF STRUCTURE	: 2	
DOMESTIC GFA	: NOT APPLICABLE	
NON-DOMESTIC GFA	: 72 m^2	(ABOUT)
TOTAL GFA	: 72 m^2	(ABOUT)
BUILDING HEIGHT	: 3 m	(ABOUT)
NO. OF STOREY	: 1	
TOTAL DISPLAYING AREA	: 1,171 m^2	(ABOUT)

STRUCTURE	USE	COVERED AREA	GROSS FLOOR AREA	BUILDING HEIGHT
B1	SHOP AND SERVICES, OFFICE AND WASHROOM	36 m^2 (ABOUT)	36 m^2 (ABOUT)	3 m (ABOUT)(1-STOREY)
B2	SHOP AND SERVICES, OFFICE AND WASHROOM	36 m^2 (ABOUT)	36 m^2 (ABOUT)	3 m (ABOUT)(1-STOREY)
	TOTAL	**72 m^2 (ABOUT)**	**72 m^2 (ABOUT)**	



PARKING AND LOADING / UNLOADING PROVISIONS

NO. OF PRIVATE CAR PARKING SPACE	: 4
DIMENSION OF PARKING SPACE	: 5 m (L) x 2.5 m (W)
NO. OF LIGHT GOODS VEHICLE PARKING SPACE	: 4
DIMENSION OF PARKING SPACE	: 7 m (L) x 3.5 m (W)

**SITE BOUNDARY FOR IDENTIFICATION PURPOSE ONLY*

LEGEND

- APPLICATION SITE
- STRUCTURE
- PARKING SPACE (PC)
- PARKING SPACE (LGV)
- INGRESS / EGRESS

NORTH
W E
S

PLANNING CONSULTANT
R-RICHES PLANNING LIMITED

PROJECT
PROPOSED TEMPORARY SHOP AND SERVICES WITH ANCILLARY FACILITIES AND ASSOCIATED FILLING OF LAND FOR A PERIOD OF 3 YEARS

SITE LOCATION
VARIOUS LOTS IN D.D. 83,
MA LIU SHUI SAN TSUEN,
LUNG YEUK TAU, FANLING,
NEW TERRITORIES

SCALE
1 : 750 @ A4

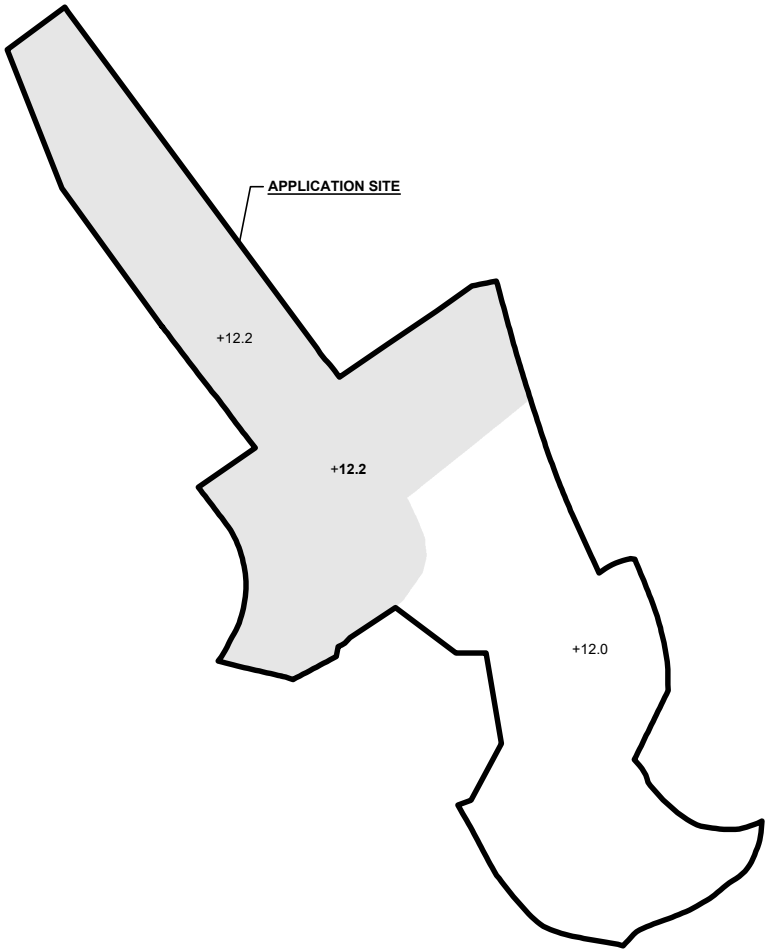
DRAWN BY	DATE
MN	08.11.2026
REVISED BY	DATE
APPROVED BY	DATE

DWG. TITLE
LAYOUT PLAN

DWG NO.	VER.
ANNEX 2 PLAN 1	001

EXISTING CONDITION OF THE APPLICATION SITE

APPLICATION SITE AREA	: 3,565 m^2	(ABOUT)
EXISTING FILLED AREA	: 1,948 m^2	(ABOUT)
EXISTING SOIL AREA	: 1,617 m^2	(ABOUT)
EXISTING SITE LEVELS	: +12.0 mPD - +12.2 mPD	(ABOUT)



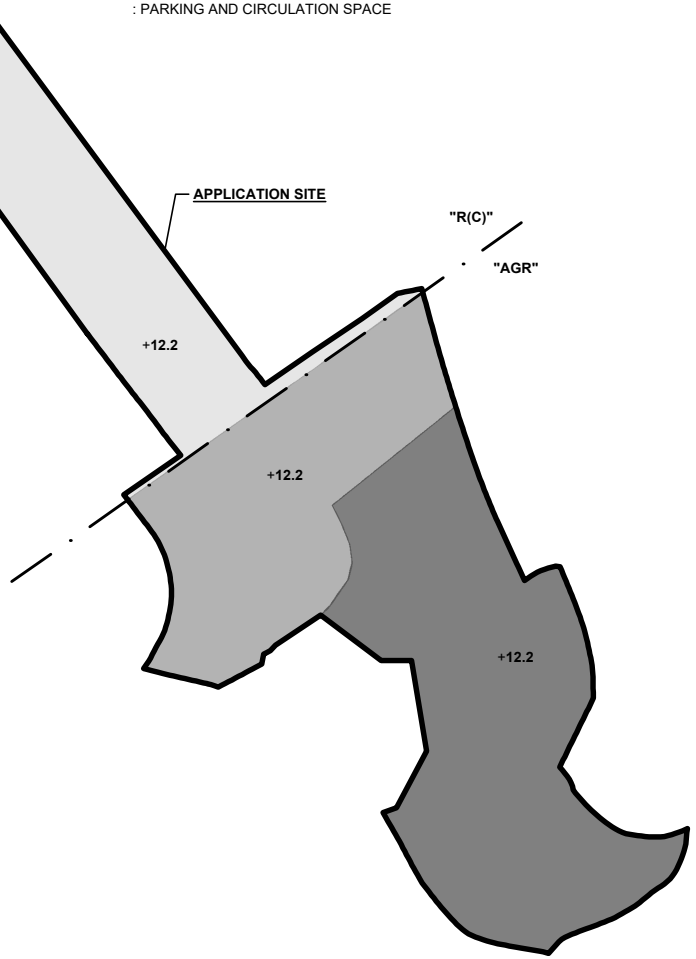
LEGEND

- APPLICATION SITE
- EXISTING FILLED AREA
- EXISTING SOIL AREA
- +12.2 EXISTING SITE LEVEL

**SITE LEVELS ARE FOR ILLUSTRATION PURPOSE ONLY*

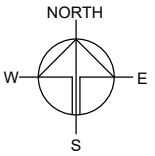
PROPOSED FILLING OF LAND AREA

APPLICATION SITE AREA	: 3,565 m^2	(ABOUT)
FILLING OF LAND AREA	: 3,565 m^2	(ABOUT)
FILLING OF LAND IN "R(C)" ZONE!	: 918 m^2	(ABOUT)
FILLING OF LAND IN "AGR" ZONE	: 2,647 m^2	(ABOUT)
- FOR REGULARISATION	*: 1,029 m^2*	*(ABOUT)*
- PROPOSED	*: 1,618 m^2*	*(ABOUT)*
DEPTH OF LAND FILLING	: NOT MORE THAN 0.2 m	
PROPOSED SITE LEVELS	: +12.2 mPD	(ABOUT)
MATERIAL OF LAND FILLING	: CONCRETE AND GRAVEL	
USE	: PARKING AND CIRCULATION SPACE	



LEGEND

- APPLICATION SITE
- LAND FILLING IN "R(C)" ZONE (EXISTING)
- LAND FILLING IN "AGR" ZONE (TO BE REGULARISED)
- LAND FILLING IN "AGR" ZONE (PROPOSED)
- **+12.2** SITE LEVEL



PLANNING CONSULTANT

R-RICHES PLANNING LIMITED

PROJECT

PROPOSED TEMPORARY SHOP AND SERVICES WITH ANCILLARY FACILITIES AND ASSOCIATED FILLING OF LAND FOR A PERIOD OF 3 YEARS

SITE LOCATION

VARIOUS LOTS IN D.D. 83,
MA LIU SHUI SAN TSUEN,
LUNG YEUK TAU, FANLING,
NEW TERRITORIES

SCALE

1 : 1000 @ A4

DRAWN BY	DATE
CC	08.11.2026
REVISED BY	DATE
APPROVED BY	DATE

DWG. TITLE

FILLING OF LAND AREA

DWG NO.	VER.
ANNEX 2 PLAN 2	001

Annex 3

Revised supplementary statement

3.4 The Site is accessible from Sha Tau Kok Road – Lung Yeuk Tau via Dao Yang Road and Hai Wing Road (**Plan 1**). An 8 m-wide (about) vehicular ingress/egress is proposed at the northern periphery. A total of 8 parking spaces is provided at the Site. Details of their provisions are shown at **Table 2** below.

Table 2 – Parking and L/UL provisions

Type of space	**No. of space**
Parking space for private cars (PC) - *2.5 m (W) x 5 m (L)*	4
Parking space for light goods vehicles (LGV) - *3.5 m (W) x 7 m (L)*	4

3.5 Sufficient space is provided for vehicles to smoothly manoeuvre within the Site to ensure that no vehicle will turn back onto the local access (**Plan 6**). Staff will be deployed to station at the ingress/egress of the Site to direct incoming/outgoing vehicles to enhance pedestrian/road safety. As the estimated trip generated/attracted by the proposed development is expected to be minimal, the adverse traffic impact to the surrounding road network is not anticipated. Details of the trip generation/attraction are shown at **Table 3** below.

Table 3 – Estimated trip generation/attraction

Time period	**Estimated trip generation/attraction**				
	PC		**LGV**		**2-way total**
	In	**Out**	**In**	**Out**	
Trips at AM peak per hour (09:00 – 10:00)	2	0	1	0	3
Trips at PM peak per hour (17:00 – 18:00)	0	2	0	1	3
Average trip per hour (10:00 – 17:00)	2	2	1	1	6

3.6 No medium or heavy goods vehicles exceeding 5.5 tonnes, including container tractors/trailers, as defined in the *Road Traffic Ordinance*, are allowed to be parked/stored on or enter/exit the Site at all times during the planning approval period.

3.7 No open storage, storage of dangerous and dusty goods, car beauty, washing, cleansing, paint-spaying, repairing, dismantling or other workshop activities will be involved at the Site at any time during the approval period of the planning permission.