



**LCH Planning and Development
Consultants Limited**

Our Ref.: PD2403001/05
Your Ref.: TPB/A/NE-MUP/213

21 March 2025

By Email

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

Dear Sir/ Madam,

**APPLICATION NO. A/NE- MUP/213 FOR PERMISSION
UNDER SECTION 16 OF THE TOWN PLANNING ORDINANCE**

We refer to the email dated 20 March 2025 of the captioned application.

We have submitted our responses to departmental comments with revised Indicative Layout Plan in Annex 1, revised Swept Path Analysis in Annex 2 and Replacement Pages of page 5, 10 and 11 of the planning statement.

Should you have any queries, please feel free to contact the undersigned or Emily Hui at

Yours faithfully,
For and on behalf of
LCH Planning & Development Consultants Limited

Junior Ho
Director

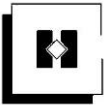
c.c. the Applicant



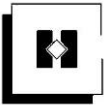
Section 16 Application No. A/NE-MUP/213

Annex 1 - Response to Departmental Comments Table

No.	Comments Received	Our Responses
<i>1. Comments from Transport Department dated 20 March 2025</i>		
(i)	The revised layout plan shows the ingress and egress points have gone in excess of the site boundary. Setting out dimension of the ingress and egress points should be shown on the layout plan. Also what is the size of vehicles used on the swept path analyses?	Noted. The swept path analysis has been revised with the size of vehicles specified on the plan.
(ii)	The proposed use of "pedestrian accident blackspot ahead" road sign is unjustified by the applicant. Please review the proposal.	Noted. The proposed use of "pedestrian accident blackspot ahead" road sign has been replaced by "Pedestrians on or crossing road ahead" road sign instead.
<i>2. Comments from Lands Department dated 17 March 2025</i>		
(i)	She objects to the application	Well noted.
(ii)	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. No right of access via Government Land (GL) is granted to the Site	Well noted. Upon approval of the planning application, the Applicant will apply for a short-term waiver from the Lands Department for the respective lots, in order to temporarily relax user restriction of the Government Lease of the Subject Lots. The ingress/egress located at the northeastern boundary of the Application Site, which allows the vehicles to pass through the local access road. A significant portion of this road falls within the boundaries of Lot 147 RP and 175 RP, located to the northeast of the site. It is noted that only a small portion of Government Land is involved in the access road. Should it be necessary, the Applicant would apply for a right of way during the submission of the STW application upon approval of this planning application.

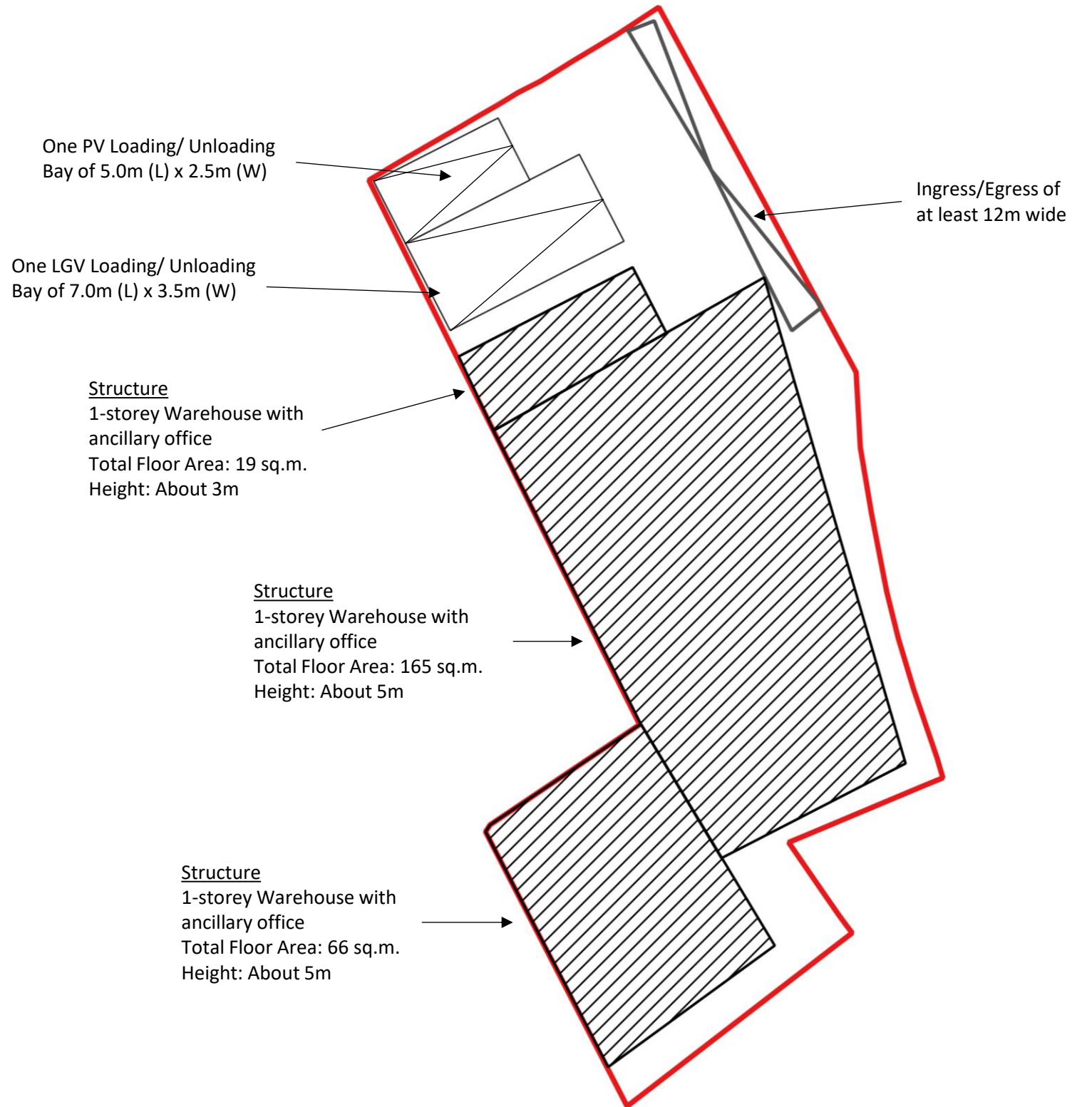


(iii)	The Site is already being used for the uses under the application	Well noted. The applicant has modified the layout of the structure, and the existing structure will be demolished. The new structure will be constructed upon the approval of the planning application and the STW application. Attached please find the revised indicative layout plan in Annex 1.
(iv)	the following irregularity covered by the subject planning application has been detected by her office: <u>unauthorised structures within the said private lots covered by the planning application</u> LandsD has reservation on the planning application since there are unauthorised structures on Lot Nos. 145 and 147 RP in D.D. 38 which are already 'subject to lease enforcement actions according to case priority. The lot owners should rectify the lease breaches as demanded by LandsD	Well noted. The applicant has modified the layout of the structure which does not involve Lot No. 175 RP. The applicant will demolish the existing structure and is going to apply STW for all structures within the concerned private lots upon approval of this planning application.
(v)	the following irregularity not covered by the subject planning application has been detected by her office: <u>unauthorised structures within the said private lots not covered by the planning application</u> there are unauthorised structures within Lot Nos. 145 and 175 RP in D.D. 38 not covered by the subject planning application. The lot owners should immediately rectify the lease breaches and her office reserves the rights to take necessary lease enforcement action against the breaches without further notice.	Well noted. The applicant has modified the layout of the structure which does not involve Lot No. 175 RP, and the existing warehouse will be demolished. Attached please find the revised indicative layout plan in Annex 1.
(vi)	the lot owners/applicant shall either (i) remove the unauthorised structures not covered by the subject planning application immediately; or (ii) include the unauthorised structure in the subject planning application for the further	Well noted. The applicant would remove all the unauthorized structures and construct the new structure as shown on the layout plan upon the approval of the planning application and STW application.



	<p>consideration by the relevant departments and, subject to the approval of the Town Planning Board to the planning application which shall have reflected the rectification or amendment as aforesaid required, apply to her office for Short Term Waiver (STW) to permit the structures erected/to be erected. The application for STW will be considered by the Government in its capacity as a landlord and there is no guarantee that it will be approved. The application for STW, if approved, will be on whole lot basis and subject to such terms and conditions including the payment of back-dated waiver fee from the first date the unauthorised structures were erected and administrative fee as considered appropriate to be imposed by LandsD. In addition, LandsD reserves the right to take enforcement action against the lot owner for any breach of the lease conditions, including the breaches already in existence or to be detected at any point of time in future. Besides, given the proposed use is temporary in nature, only erection of temporary structures will be considered</p>	
(vii)	<p>unless and until the unauthorised structures are duly rectified by the lot owners/applicant or entirely included in the subject planning application, she objects to the application which must be brought to the attention of the Town Planning Board when they consider the application.</p>	<p>Well noted.</p>

Proposed Development Parameters	
Site Area :	About 410 sq.m.
Nos. of Structure :	3
Built Over Area :	About 250 sq.m.
Max. Building Height :	5 meters
Site Coverage :	About 61%



One PV Loading/ Unloading Bay of 5.0m (L) x 2.5m (W)



Ingress/Egress of at least 12m wide

One LGV Loading/ Unloading Bay of 7.0m (L) x 3.5m (W)

Structure
1-storey Warehouse with ancillary office
Total Floor Area: 19 sq.m.
Height: About 3m

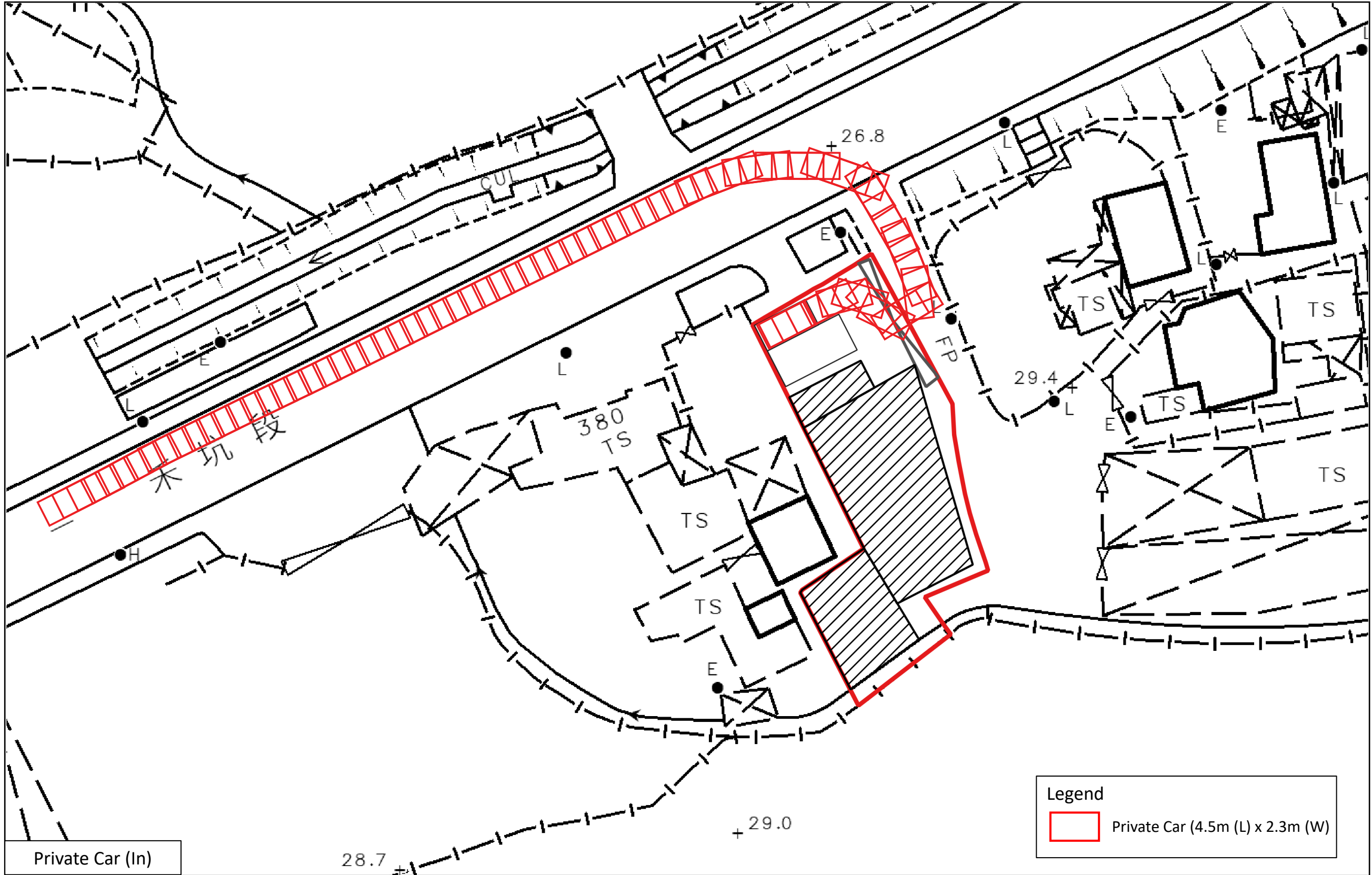
Structure
1-storey Warehouse with ancillary office
Total Floor Area: 165 sq.m.
Height: About 5m

Structure
1-storey Warehouse with ancillary office
Total Floor Area: 66 sq.m.
Height: About 5m

 Application Site
 Proposed Structures



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Section 16 Application for Proposed Temporary Warehouse (excluding Dangerous Goods Godown) with Ancillary Office for a period of 3 Years at Loi Tung, New Territories



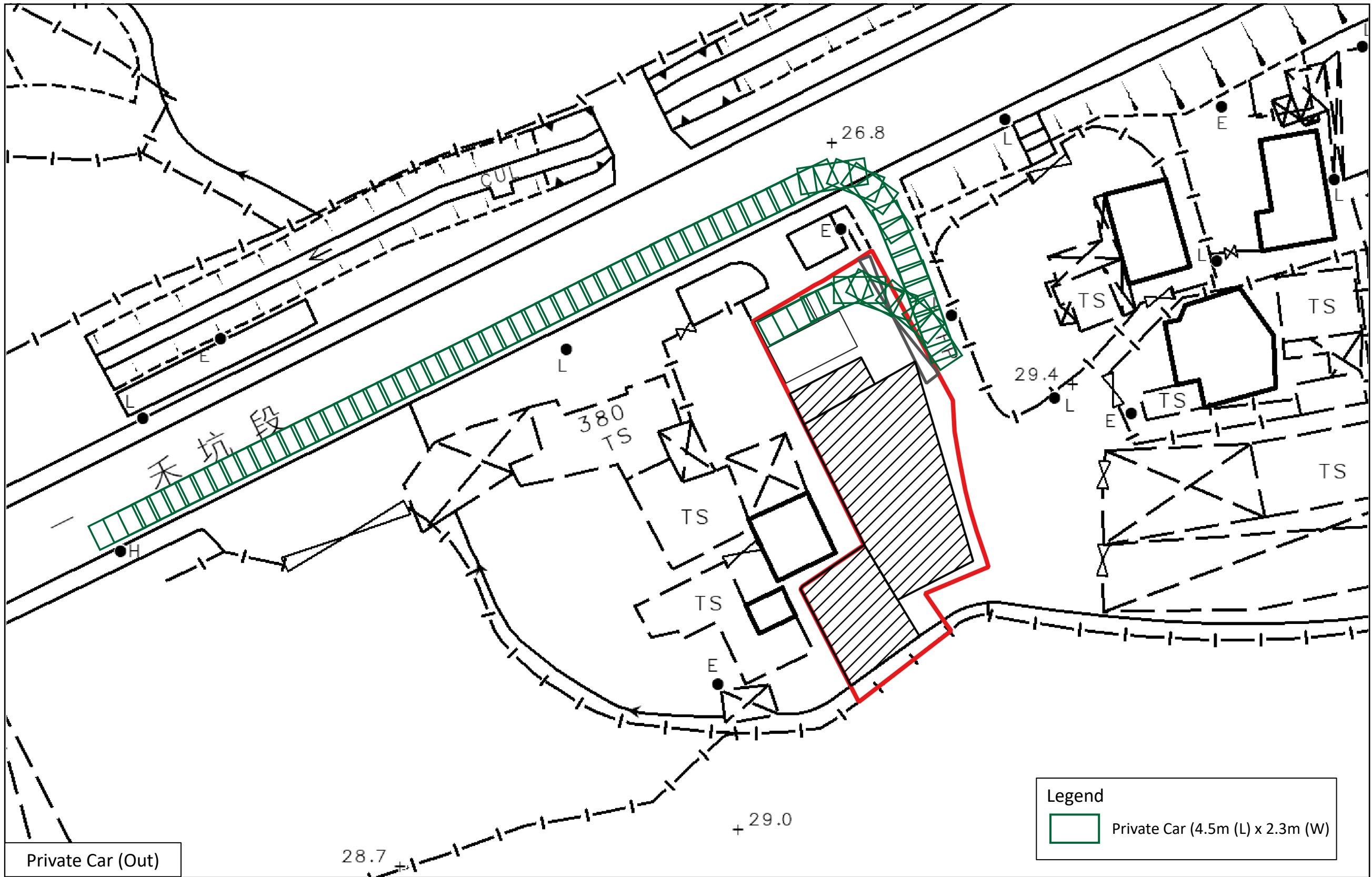
Private Car (In)

Legend

 Private Car (4.5m (L) x 2.3m (W))


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Private Car (Out)

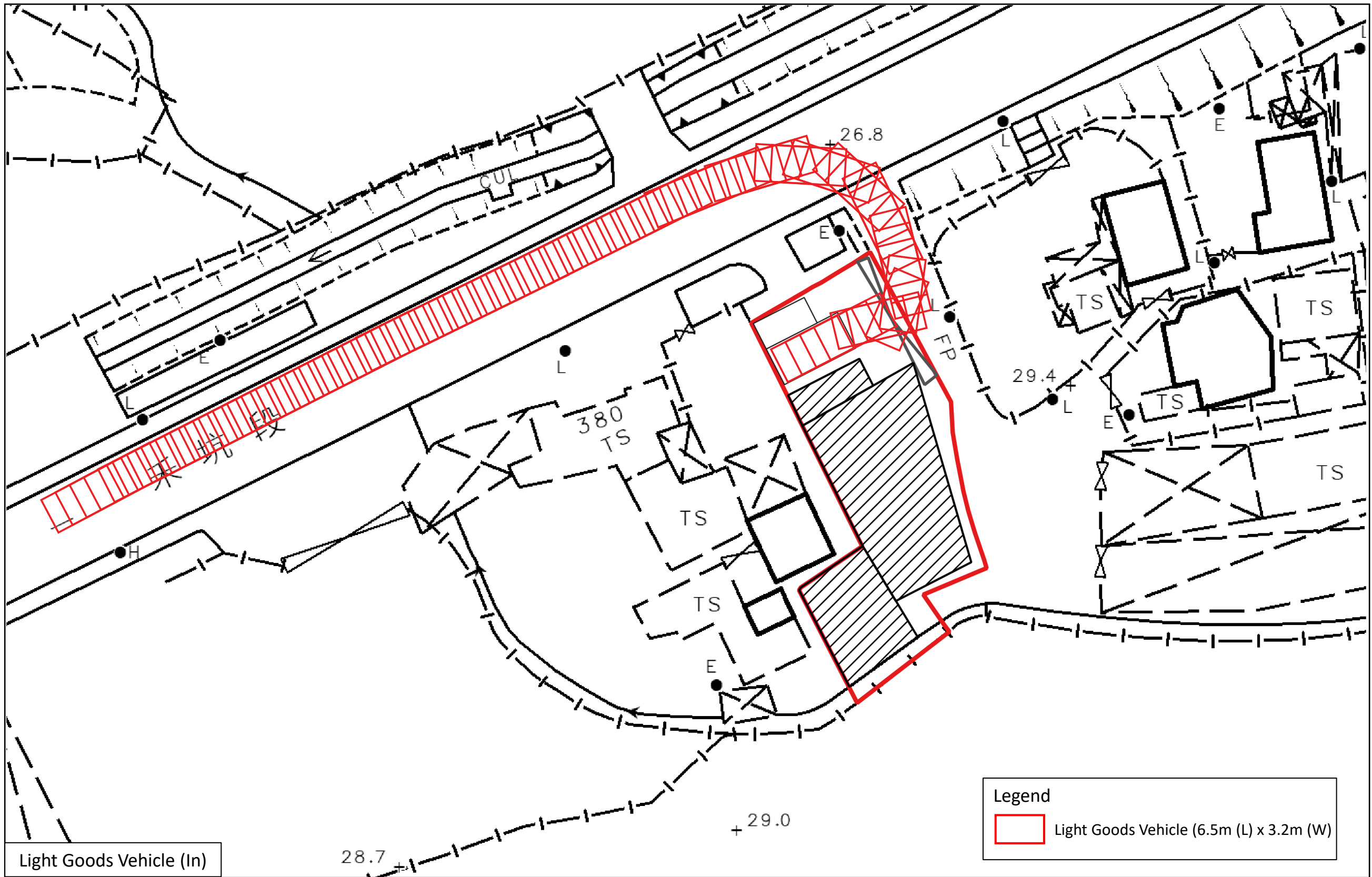
Legend

 Private Car (4.5m (L) x 2.3m (W))

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Annex 2 : Swept Path Analysis



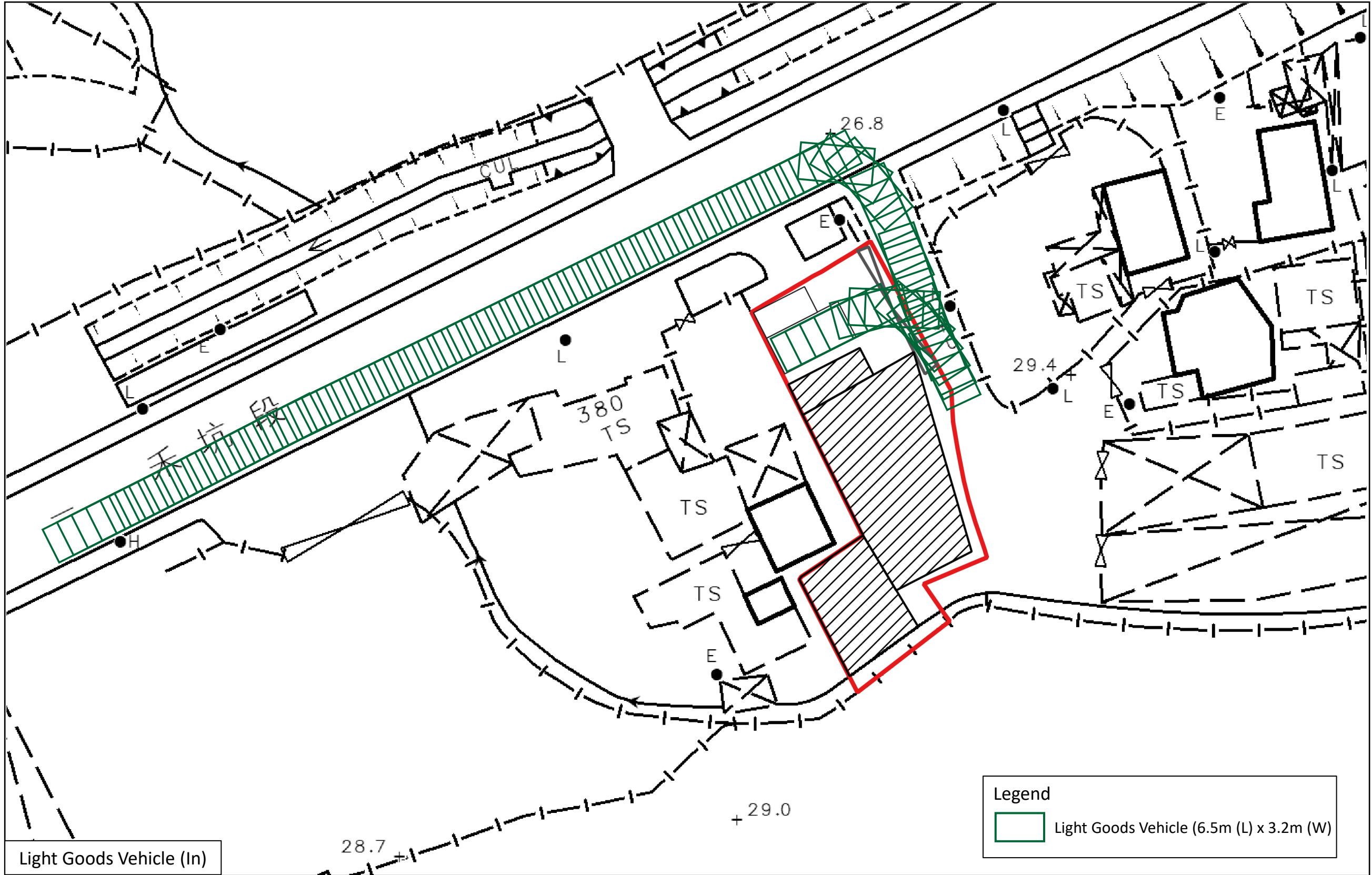
Light Goods Vehicle (In)



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Light Goods Vehicle (In)

Legend

 Light Goods Vehicle (6.5m (L) x 3.2m (W))

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Annex 2 : Swept Path Analysis



and ancillary office/ storage. The total covered area of the site is about 248 sq.m.. A total of two loading/unloading bay will be provided for Private Car and Light Goods Vehicle.

Parameters	Proposed Development
Site Area	About 410 sq.m.
No. of Structures	3
Covered Area	About 250 sq.m.
Maximum Height of Structure	5 meters/ 1 storey
Maximum Total Site Coverage	About 61%
Maximum Plot Ratio	About 0.61
No. of Loading/ Unloading Bays for Private Car and Light Goods Vehicle	2

2.5.2 Among the three various 1-storey structures, the proposed warehouse with an ancillary office, which is an existing structure, is situated in the northern area of the Application Site and no alteration work will be involved to the existing structure. Additional construction work will be carried out for the other two proposed 1-storey structures for storage and warehouse with ancillary office, which are located in the western and southern areas of the Application Site.

2.5.3 The site is already hard-paved and hence no site formation works would be required. The existing about 1.5 m metal fencing will be remained along the site boundary. The indicative layout plan of the Proposed Development is shown in **Annex 2**.

2.6 Operation Arrangement

2.6.1 The Proposed Development will operate from 9:00 am to 7:00 pm from Mondays to Saturdays, with no operation on Sundays and public holidays. The operation hours align with those of the nearby industrial establishments and open storage facilities.

2.6.2 Similar to the existing use, the Proposed Development will solely serve as storage purposes of non-polluting and non-dangerous goods with extension of covered area only. It is intended to be storage of construction material. No direct provision of goods and services will be conducted on the Application Site. No incoming visitors are anticipated.

2.6.3 Upon acquiring planning permission from the Board, the Applicant would strictly follow the relevant requirements in respect of fire safety, hygiene, drainage and noise nuisance.



commerce and industry zone that accommodates various sectors, which fosters economic growth and urbanization in the New Territories North area.

3.4.3 The future development in the Northern area of Hong Kong indicates a change in the land use pattern as well as reconfiguration of the built environment, promoting urban-rural integration of the Northern area of Hong Kong. As the population as well as the economic and industrial activities continue to grow in the area, it become crucial to optimize the use of land resources for storage purposes in order to cater the evolving needs of the community.

3.5 Similar Approved Application for Warehouse

3.5.1 There is a similar application approved by the Town Planning Board in 2023 which falls within “R(D)” zone in the same Outline Zoning Plan for Temporary Workshop, Warehouse and Open Storage uses. Refer to **Figure 4** for location.

Application No.	Applied Use	Decision
A/NE-MUP/185	Proposed Temporary Warehouse with Ancillary Facilities for a Period of 3 Years and Associated Filling of Land	Approved with conditions on 19 May 2023

3.6 Traffic Consideration

3.6.1 The Proposed Development comprises a total of 2 loading/unloading bays for Private Car and Light Goods Vehicle respectively which are intended solely for the purpose of delivering materials to meet operational needs. These are exclusively used for material deliveries to support operations only. The staff will commute by public transport or private cars. There are also bus and minibus stops on Sha Tau Kok Road – Wo Hang to Fanling/ Sheung Shui MTR Stations is reachable within 5 minutes walking distance from the Application Site.

3.6.2 The ingress/egress located at the northeastern boundary of the Application Site is about 12 m wide, which allows the vehicles to access to/from the local access road at the north of the site. Queuing up of vehicles at the ingress/egress is not anticipated at the ingress/egress point. Refer to **Annex 3** for the swept path analysis.

3.6.3 It is estimated that there will only be 1 roundtrip of Light Goods Vehicles per peak operation hour for the delivery of materials and 1 roundtrip of private car per peak operation hour for commuting purpose which will not cause a significant impact on trip generation and trip attraction within and around the site. Thus, it is not anticipated to have any adverse traffic impact to the existing roads. This limited traffic volume is not expected to significantly impact traffic generation or attraction in the surrounding area. As a result, no vehicle queuing is anticipated.



Type of Vehicle	Generation (per peak hour)	Attraction (per peak hour)
Light Goods Vehicles	1	1
Private Car	1	1

3.6.4 The Proposed Development solely serves as storage purposes. No direct sign provision of goods and services will be conducted on the Application Site and no incoming visitors are anticipated.

3.6.5 A “Pedestrians on or crossing road ahead” road sign will be posted at the ingress/egress of the Application Site which serves as a warning to drivers, alerting them to the presence of pedestrians who may crossing the road in front of or from behind. With the advanced notice, drivers can exercise extra caution and be more attentive to the potential hazards in the surroundings.

3.6.6 Road pumps will also be installed at the ingress/egress and within the car park in order to help control and reduce the speed of vehicles which helps mitigate the risks of car accidents, particularly in areas where pedestrians may present. These two measures can ensure safety of both drivers and pedestrians.

3.7 Environmental Consideration

3.7.1 As the Proposed Development accommodates warehouse of non-polluting and non-dangerous goods, which is similar to the existing use, it is not expected to generate any contaminated waste or pollution. Besides, no complaint from environmental perspective has been received in the past years.

3.7.2 The Applicant will follow the relevant mitigation measures and requirements in the latest “Code of Practice on Handling Environmental Aspects of Temporary Uses and Open Storage Sites” to minimize any potential environmental impact. There will be no heavy goods vehicle accessing the Application Site, and no dust generating activities will be happened. No adverse environmental impact is anticipated.

3.8 Visual and Landscape Compatibility

3.8.1 The Application Site is situated in rural area which are surrounded by warehouses, temporary structures and workshop activities. The proposed warehouse and open storage use is compatible with the surrounding use and will disturb the prevailing rural village landscape character. No existing trees within the Site will be affected. The proposed structure with a maximum height of about 5 metres is visually compatible with the warehouses and factories in the vicinity, given that the approved similar application at the immediate south has approved a maximum building height of 2-storey/ 13m already. No adverse visual impact is anticipated.