

Our Ref.: DD 126 Lot 29 & VL Your Ref.: TPB/A/YL-PS/739

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

By Email

11 February 2025

Dear Sir,

1st Further Information

Proposed Temporary Open Storage of Vehicle with Ancillary Facilities for a Period of 3 Years and Associated Filling of Land and Pond in "Recreation" Zone, Various Lots in D.D. 126 and Adjoining Government Land, Ping Shan, Yuen Long, New Territories

(S.16 Planning Application No. A/YL-PS/739)

We write to submit further information in response to comments of the subject application.

Should you require more information regarding the application, please contact our Mr. Danny NG at (852) 2339 0884 / dannyng@r-riches.com.hk or the undersigned at your convenience. Thank you for your kind attention.

Yours faithfully,

For and on behalf of

R-riches Property Consultants Limited

Christian CHIM

Town Planner

cc DPO/TMYLW, PlanD

(Attn.: Mr. Max WONG (Attn.: Mr. Spencer LEUNG email: mylwong@pland.gov.hk)

email: sktleung@pland.gov.hk)







香港新界錦田吉慶圍 236 號盈匯坊 D 座

Responses-to-Comments

Proposed Temporary Open Storage of Vehicle with Ancillary Facilities for a Period of 3 Years and Associated Filling of Land and Pond in "Recreation" Zone, Various Lots in D.D. 126 and Adjoining Government Land, Ping Shan, Yuen Long, New Territories

(Application No. A/YL-PS/739)

(i) A RtoC Table:

	Departmental Comments	Applicant's Responses					
1. (1. Comments of the Head of the Geotechnical Engineering Office, Civil Engineering and						
	Development Department (GEO, CEDD)						
(a)	The subject site is overlooked by steep	Noted.					
	natural terrain and meets the alert criteria						
	for a natural terrain hazard study (NTHS).						
	The applicant is required to submit a						
	Geotechnical Planning Review Report						
	(GPRR) in support of the planning						
	application. The GPRR should include a						
	preliminary geotechnical review of the						
	natural terrain hazards, assess the						
	geotechnical feasibility of the proposed						
	development, and where necessary,						
	indicate the recommended extent of the						
	NTHS area and a commitment to undertake						
	the NTHS and to carry out any necessary						
	mitigation measures as part of the						
	proposed development. Other essential						
	contents of a GPRR are given in the attached						
	GEO Advice Note (Annex 1).						
(b)	Given the temporary nature and the	No critical facilities will be located within the					
	proposed use as open storage of the subject	"no-build" zone. The proposed structure, i.e. a					
	site, the requirement for NTHS might make	guardroom, is located about 30 m away from the					
	the case not economically viable. As an	boundary of the "no-build" zone. Besides, no					
	alternative, part of the subject site (as	manned facilities nor open storage of dangerous					
	indicated in Annex 2) maybe designated as	goods will be allowed within the "no-build" zone.					
	a "no-build" zone, within which no critical	As such, it is considered that the requirement for					
	facilities (i.e. facilities under Groups 1 to 3 in	Natural Terrain Hazard Study would not be					
	Annex 3) should be located. In particular,	necessary. Please refer to the Layout Plan at					
	the proposed site offices should be located	Plan 1 of Annex 1.					
	away from the "no-build" zone. With the						
	inclusion of the "no-build" zone, the						
	requirement for NTHS may be waived.						

(c)	An existing man-made slope (feature no.	Noted.
(-,	6NW-B/C73) and some unregistered slopes	
	are located within or in the vicinity of the	
	application site. These slopes may affect or	
	be affected by the proposed development.	
	Please remind the applicant of the	
	requirements of making necessary site	
	formation submission(s), including but not	
	be limited to stability assessments of the	
	existing/proposed geotechnical features	
	within or in the vicinity of the Site, to the	
	Buildings Department for approval as	
	required under the provisions of Buildings	
	Ordinance if found applicable.	
(d)	Unauthorised development was previously	
	identified within and in the vicinity of the	
	captioned lots in May 2023.	
(e)	Please remind the applicant that the subject	
	site is located within Scheduled Area No. 2	
	and may be underlain by cavernous marble.	
	Depending on the nature of foundation, if	
	necessary, of the new development at the	
	proposed area, extensive geotechnical	
	investigation may be required. Such	
	investigation may require high level of	
	involvement of an experienced	
	geotechnical engineer both in the design	
	and in the supervision of geotechnical aspects of the works required to be carried	
	·	
	out on the subject site.	

Departmental Comments

Applicant's Responses

2. Comments of the Chief Engineer/Mainland North, Drainage Services Department (CE/MN, DSD)

In view of the large area of the application (a) site, should the Town Planning Board consider that the application is acceptable from the planning point of view, I would suggest that a condition should be stipulated in the approval letter requiring the applicant to submit a Drainage Impact Assessment (DIA) report, to implement and maintain the drainage facilities proposed in the DIA report to the satisfaction of this The applicant is required to Division. demonstrate in the DIA report that the proposed works will not obstruct the overland flow nor cause any adverse drainage impact to the adjacent areas. The applicant shall be liable for any adverse drainage impact due to the proposed works.

Noted. The applicant will submit a Drainage Impact Assessment upon obtaining planning permission from the Town Planning Board (the Board).



Departmental Comments

Applicant's Responses

3. Comments of the Director of Environmental Protection (DEP)

It is noted that there are residential (a) buildings (i.e. Shing Uk Tsuen) located approximately 50 m from the subject site boundary. Environmental issues such as air and noise nuisance may arise if adequate mitigation and/or pollution control measures are not implemented. Tο enlighten our views, this office would appreciate it if the Applicant can clarify whether the proposed uses involve traffic of heavy vehicles, vehicle repairing, or dismantling operations, and to advise the environmental control measures to be implemented to mitigate the relevant impacts. The Applicant can make reference to the "Code of Practice on Handling the Environmental Aspects of Temporary Uses and Open Storage Sites".

Container vehicles will be deployed for the transportation of brand-new vehicles into/out of the application site (the Site). In order to minimise the potential adverse traffic and noise impacts, the delivery operations will be restricted within non-peak hours, i.e. between 10:00 and 17:00. It is expected that not more than 4 nos. of vehicular trip will be by proposed generated/attracted the development on an hourly basis (Sections 5.7-5.9 of the Planning Statement refer), which shall not lead to significant adverse traffic and noise impacts to the surroundings.

The applicant will strictly follow the 'Code of Practice on Handling the Environmental Aspects of Temporary Uses and Open Storage Sites' to minimise the potential adverse environmental impacts and nuisance to the surrounding areas (Section 5.10 of the Planning Statement refers).

The applicant proposes to erect 2.5 m high solid metal fencing along the site boundary to minimise the potential visual and noise nuisance to the surroundings. Maintenance will be conducted by the applicant on a regular basis (Section 5.13 of the Planning Statement refers).

(b) It is noted that part of the site area falls within the Deep Bay Buffer Zone 2. Kindly be advised that a residential or recreational development, other than New Territories exempted houses, within Deep Bay Buffer Zone 1 or 2 may constitute to a Designated Project under Schedule 2 of the EIAO. If there are any applicable developments related to the proposed uses, the Applicant should review the potential implication under EIAO.

Noted.



Departmental Comments

Applicant's Responses

4. Comments of the Director of Agriculture, Fisheries and Conservation (DAFC)

The application site is located within the Wetland Buffer Area. It is adjacent to the Wetland Conservation Area and "Conservation Area" zone to the north while its northern tip encroaches on the Priority Site for Enhanced Conservation under the New Nature Conservation Policy. The site is largely vegetated with marsh/swamp at the eastern portion and woodland/shrubland at the portion. The surrounding area is largely rural with ponds and vegetation. proposed filling of land and pond will result in potential loss of wetlands and potential adverse ecological impacts to the adjacent wetlands in the WCA. However, no ecological impact assessment has been submitted to demonstrate that any negative impacts could be mitigated through positive measures. Therefore, we have reservation on the application from nature conservation perspective.

Noting that some existing marsh/swamp has been found within the northern portion of the Site, the applicant proposes to provide <u>buffer area</u> around the existing marsh/swamp, which will be surrounded by periphery fencing to minimise the potential adverse visual and noise impacts to the habitat.

Moreover, the applicant proposes to reduce the open storage area from 33,358 m² (about) to 27,953 m² (about) with a view to preserving the existing marsh/swamp. The extent of the proposed filling of land has also been shrunk from 41,010 m² (about) to 31,764 m² (about) in view of the reduced open storage area.

Please refer to the revised Layout Plan and revised plan showing the filling of land/pond at Plans 1 and 2 of **Annex 1**.

The revised Swept Path Analysis and the revised pages of the Planning Statement and Form No. S16-III are also enclosed at **Annex 1**.



Departmental Comments		Applicant's Responses		
5.	Comments of the Chief Town Planner/Urban D	Design and Landscape, Planning Department		
	(CTP/UD&L, PlanD)			
(a)	No landscape technical assessment such as	The applicant proposes to plant 42 nos. of new		
	information of existing landscape resources	<u>trees</u> of local species along the eastern periphery		
	and proposed mitigation measures are	of the Site, with a view to mitigating the		
	included. The Applicant should provide the	potential adverse landscape impact that would		
	broadbrush tree survey, mitigation	have arisen from the proposed development.		
	measures and landscape proposal to	The Landscape Plan is enclosed at Plan 1 of		
	demonstrate that the proposed uses would	Annex 2.		
	not have adverse landscape impact on the			
	Site and surrounding areas.			

(ii) The applicant provides responses to comments on the application received during the public inspection period:

Town Planning Board Guidelines Aspect

- with reference to Town Planning Board Guidelines No. 13G (TPB PG-No. 13G), the Board would also take other considerations into account, such as the important role of open storage and port back-up uses in Hong Kong's economy and provision of employment opportunities, as well as the difficulties faced by operators/uses affected by resumption and clearance operations of the Government in finding a replacement site to make way for developments. Sympathetic consideration could be given to such type of applications; and
- despite the fact that the Site situates within Category 3 area under TPB PG-No. 13G, the special background of the applicant being an affected operator under the public housing development near Tin Tsz Road in Tin Shui Wai should be considered on its individual merit, of which approval of the application would not set an undesirable precedent. In addition, the application is to facilitate the relocation of the affected operator, which is crucial to the smooth clearance of land and implementation of the public housing development, and the provision of operating space for displaced brownfield operations still needed by the community.

Environmental & Drainage Aspects

- the application is to seek planning permission on a temporary basis for a period of 3 years, the majority of the Site will be for open storage use where no structure will be erected thereon, whilst the remaining area will be reserved for circulation area. The applicant undertakes to reinstate the Site into an amenity area suitable for recreation use upon expiry of the planning permission;
- upon obtaining planning permission from the Board, the applicant will provide periphery drainage u-channel with catchpits and sand trap to collect the surface run-off from the Site



(Section 5.15 of the Planning Statement refers). The final design of drainage facilities shall subject to requirements of the Drainage Authority. With the proper implementation of the drainage facilities, adverse drainage impacts to the surroundings shall not be envisaged; and

the proposed development involves the open storage of brand-new vehicles pending for sale, which shall not incur frequent traffic trips onto the local road network. According to the development proposal (Section 5.7 of the Planning Statement refers), container vehicles will be deployed for the transportation of vehicles into/out of the Site only during non-peak hours (i.e. between 10:00 and 17:00). Besides, 2.5 m-high solid metal fencing will be erected along the site boundary (Section 5.13 of the Planning Statement refers). No vehicle workshop activity will be carried out at the Site. As such, it is anticipated that the proposed development would not impose adverse traffic, air quality and noise impacts to the surrounding area.

Operation Aspects

- although the site occupies an area of 41,010 m² (about), a portion of the Site, i.e. 68%, 27,953 m² (about), will be designated for open storage use. The Site is proposed to accommodate about 2,000 nos. of brand-new vehicle pending for sale, which is equivalent to 14 m² (about) per vehicle, taking into account the internal circulation area and side clearance of each vehicle within the open storage area. According to the *Hong Kong Planning Standards and Guidelines*, the recommended dimension for private car parking space is 12.5 m², i.e. 5 m (L) x 2.5 m (W). Hence, it is anticipated that the designated open storage area is reasonable and sufficient to meet the demand for vehicle storage; and
- the Site comprises Old Schedule Lots held under the Block Government Lease which contains
 restriction that no structures are allowed to be erected without the prior approval of Short
 Term Waivers from the Government, the usage of a multi-storey racking system on a
 temporary basis at the Site is considered to be impracticable from economic and operation
 perspectives.



Annex 1

Revised Plans, Planning Statement and Form S.16-III



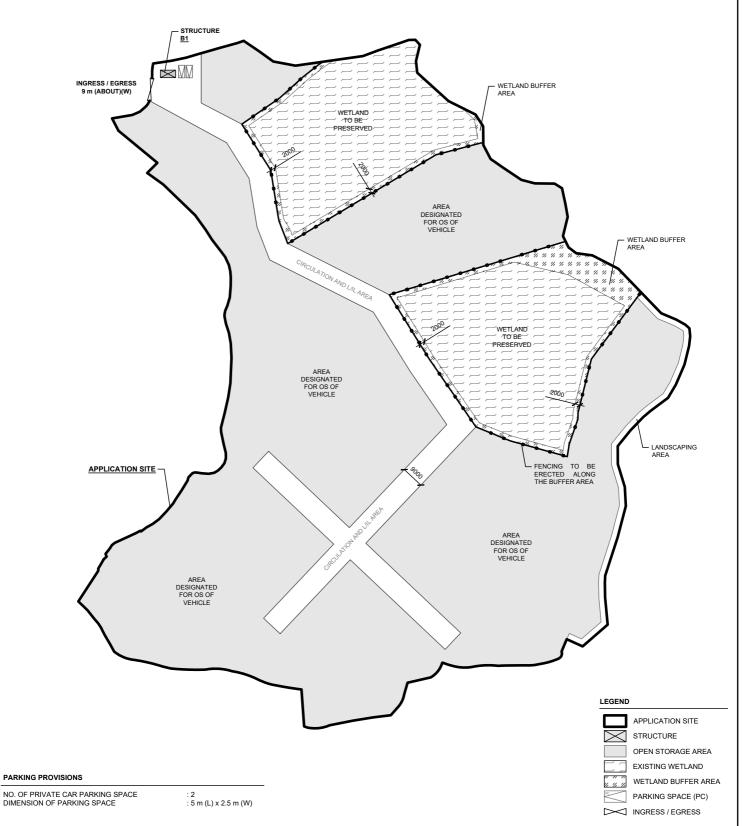
DEVELOPMENT PARAMETERS APPLICATION SITE AREA COVERED AREA : 41,010 m² : 18 m² (ABOUT) (ABOUT) UNCOVERED AREA : 40,992 m² (ABOUT) PLOT RATIO SITE COVERAGE : 0.0004

(ABOUT) (ABOUT) : 0.04 %

NO. OF STRUCTURE DOMESTIC GFA NON-DOMESTIC GFA : NOT APPLICABLE : 18 m² (A : 18 m² (A (ABOUT) (ABOUT) TOTAL GFA (ABOUT)

BUILDING HEIGHT : 3 m : 1 NO. OF STOREY

OPEN STORAGE AREA : 28.378 m² (ABOUT) STRUCTURE USE COVERED AREA GFA BUILDING HEIGHT GUARDROOM 18 m² (ABOUT) 3 m (ABOUT)(1-STOREY) B1 18 m² (ABOUT) TOTAL 18 m² (ABOUT) 18 m² (ABOUT)



PLANNING CONSULTANT

PROPOSED TEMPORARY OPEN STORAGE OF VEHICLE WITH ANCILLARY FACILITIES FOR A PERIOD OF 3 YEARS AND ASSOCIATED **R-Riches** FILLING OF LAND AND POND

VARIOUS LOTS IN D.D. 126 AND ADJOINING GOVERNMENT LAND, PING SHAN, YUEN LONG, NEW TERRITORIES

1 : 1500 @ A4 LAYOUT PLAN 7.2.2025 PLAN 1 002



EXISTING CONDITION OF THE APPLICATION SITE

CONDITION OF THE APPLICATION SITE IN 1990s

*SITE LEVELS ARE FOR REFERENCE ONLY.

EXACT SITE LEVELS ARE SUBJECT TO DETAILED SURVEY.

(ABOUT) APPLICATION SITE AREA : 41.010 m² EXISTING SITE LEVELS : +5.7 mPD - +9.7 mPD (ABOUT)

GROUND SURFACE : SOILED GROUND

POND AREA : 13,394 m² (ABOUT) DEPTH OF POND : NOT MORE THAN 0.5 m

APPLICATION SITE +7.5 +8.2

LEGEND

APPLICATION SITE

POND AREA BEFORE KEY DATE OF OZP _10.2 EXISTING SITE LEVEL

PROPOSED FILLING OF LAND AND POND AT THE APPLICATION SITE

APPLICATION SITE AREA : 41,010 m²

PROPOSED FILLING AREA MATERIAL OF FILLING PROPOSED DEPTH OF FILLING

: 31,764 m² : CONCRETE : NOT MORE THAN 0.1 m PROPOSED SITE LEVELS

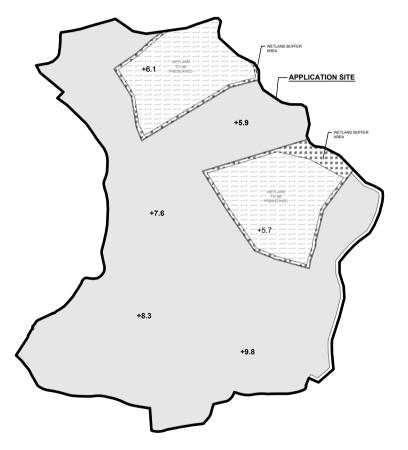
: +5.7 mPD - +9.8 mPD (ABOUT) PURPOSE OF FILLING : SITE FORMATION OF STRUCTURE, STORAGE OF VEHICLE, PARKING

SPACES AND CIRCULATION AREA

(ABOUT)

(ABOUT)

EXISTING FILLING OF POND AREA: 13,394 m² (ABOUT) DEPTH OF FILLING : NOT MORE THAN 0.5 m



THE PONDS WERE FILLED IN THE 1990s AND NO FURTHER FILLING OF POND WILL BE CARRIED OUT AFTER OBTAINING PLANNING PERMISSION FROM THE BOARD.

0.1 m OF CONCRETE WILL BE FILLED ON TOP OF THE EXISTING FILLED POND AFTER PLANNING PERMISSION HAS BEEN GRANTED FROM THE BOARD.

LEGEND

APPLICATION SITE

FILLING OF LAND AND POND AREA

EXISTING WETLAND WETLAND BUFFER AREA

_10.2 PROPOSED SITE LEVEL

NORTH



PROPOSED TEMPORARY OPEN STORAGE OF VEHICLE WITH ANCILLARY FACILITIES FOR A PERIOD OF 3 YEARS AND ASSOCIATED FILLING OF LAND AND POND

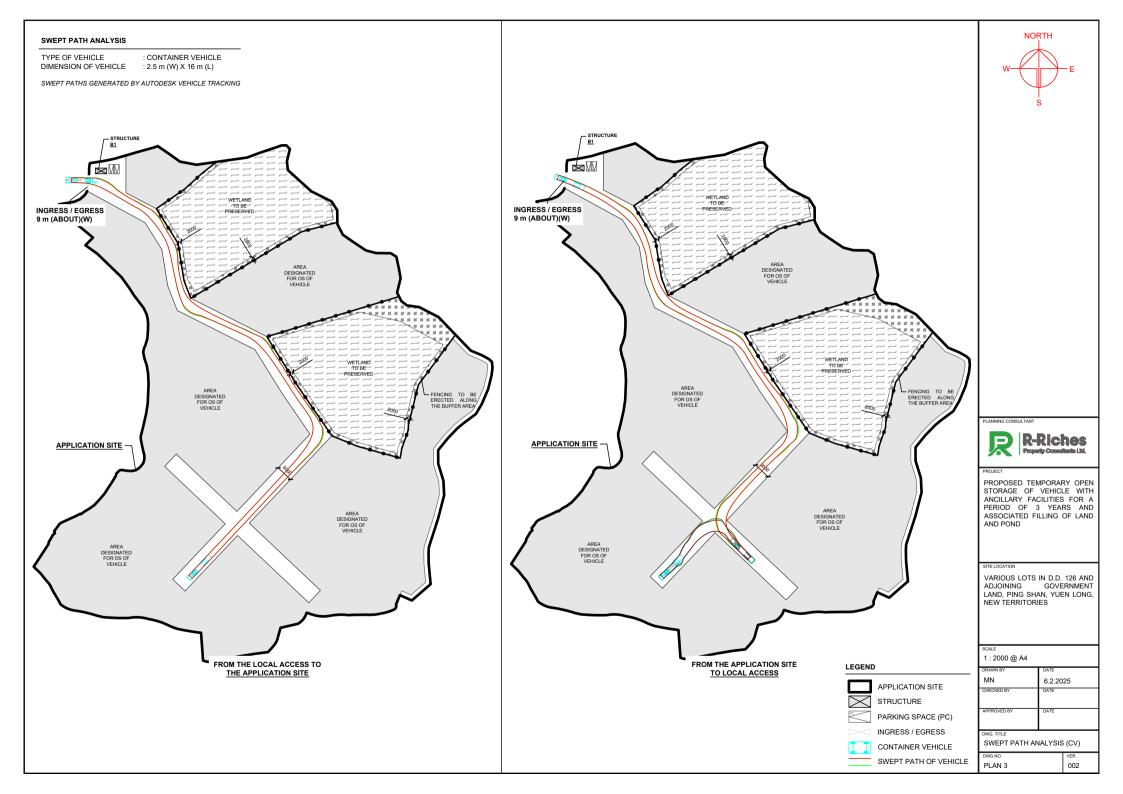
VARIOUS LOTS IN D.D. 126 AND ADJOINING GOVERNMENT LAND, PING SHAN, YUEN LONG, NEW TERRITORIES

1:2500 @ A4 7.2.2025 PEVISED BY

FILLING OF LAND AND POND

PLAN 2

002



Filling of Land at the Site

Majority of the Site (i.e. 77%, 31,764 m² (about)) is proposed to be filled with concrete of not more than 0.1 m in depth (from the range of +5.7 mPD and +9.7 mPD to the range of +5.8 mPD and +9.8 mPD) for open storage of vehicle, site formation of structure, parking space, and L/UL and circulation area (Plan 11). As the Site is currently of soiled ground, concrete site formation is required to provide a relatively flat and solid surface for the applied use. Hence, hard-paving of the Site is considered required and has been kept to minimal to meet the operation need of the proposed development.

Operation Mode

- 5.5 The Site is designated for open storage of about 2,250 vehicles including private cars (PCs), light goods vehicles (LGVs) and light buses (LBs), which are the same as those in the original premises. The area designated for open storage of vehicle is 33,358 m² (about) (i.e. about 81% of the site area). Operation hours are Monday to Saturday from 09:00 to 18:00. There is no operation on Sunday and public holidays.
- 5.6 It is estimated that the Site would be able to accommodate not more than <u>3</u> staff. As no shopfront is proposed at the Site, visitor is <u>not</u> anticipated at the Site.

Minimal Traffic Impact

5.7 The Site is accessible from Tin Wah Road via a local access (**Plan 1**). A 9 m (about) wide ingress/egress is provided at the northwestern part of the Site (**Plan 10**). Two private car parking spaces are provided at the Site for staff use. Container vehicles will be deployed for the transportation of vehicles into/out of the Site during non-peak hours (i.e. between 10:00 and 17:00). Details of the parking space provision are shown at **Table 4** below:

Table 4 – Provision of Parking Spaces

Type of Space	No. of Space	
Parking space for private cars	2	
- 2.5 m (W) x 5 m (L)	2	

5.8 Sufficient space is provided for vehicle to manoeuvere smoothly within the Site to ensure that no vehicle will be allowed to queue back to or reverse onto/from the Site to the public road (**Plan 12**). Staff is deployed to station at the ingress/egress of the Site to direct incoming/outgoing vehicles to enhance pedestrian safety. The breakdown of estimated trip generation/attraction of proposed development at AM and PM peak hours are provided at **Table 5** below.



Proposed operating hours 擬議營運時間 Monday to Saturday from 09:00 to 18:00. No operation on Sunday and public holidays					
••••					
(d)	Any vehicular acce the site/subject buildi 是否有車路通往地 有關建築物?	ing?	│ There is an existing access. (please indicate the street name, where appropriate) 有一條現有車路。(請註明車路名稱(如適用)) Accessible from Tin Wah Road via a local access □ There is a proposed access. (please illustrate on plan and specify the width) 有一條擬議車路。(請在圖則顯示,並註明車路的闊度)		
()	I (D 1				
(e)	(If necessary, please u	nent Proposal 擬議發展計劃的影響 use separate sheets to indicate the proposed measures to minimise possible adverse impacts or give for not providing such measures. 如需要的話,請另頁註明可盡量減少可能出現不良影響的理據/理由。)			
(i)	Does the	Yes 是 [□ Please provide details 請提供詳情		
	development proposal involve alteration of existing building? 擬議發展計劃是否包括現有建築物的改動?		」 Trease provide details 可提供时间		
(ii)	Does the development proposal involve the operation on the right? 擬議發展是否涉及右列的工程?	Yes 是 [✓ (Please indicate on site plan the boundary of concerned land/pond(s), and particulars of stream diversion, the extent of filling of land/pond(s) and/or excavation of land) (請用地盤平面圖顯示有關土地/池塘界線,以及河道改道、填塘、填土及/或挖土的細節及/或範圍) □ Diversion of stream 河道改道 ✓ Filling of pond 填塘		
(iii)	Would the development proposal cause any adverse impacts? 擬議發展計劃會否造成不良影響?	On traffic is On water su On drainage On slopes is Affected by Landscape is Tree Felling Visual Impa	upply 對供水 Yes 會 □ No 不會 ✓ e 對排水 Yes 會 □ No 不會 ✓		

Annex 2

Landscape Plan



LANDSCAPE PLAN

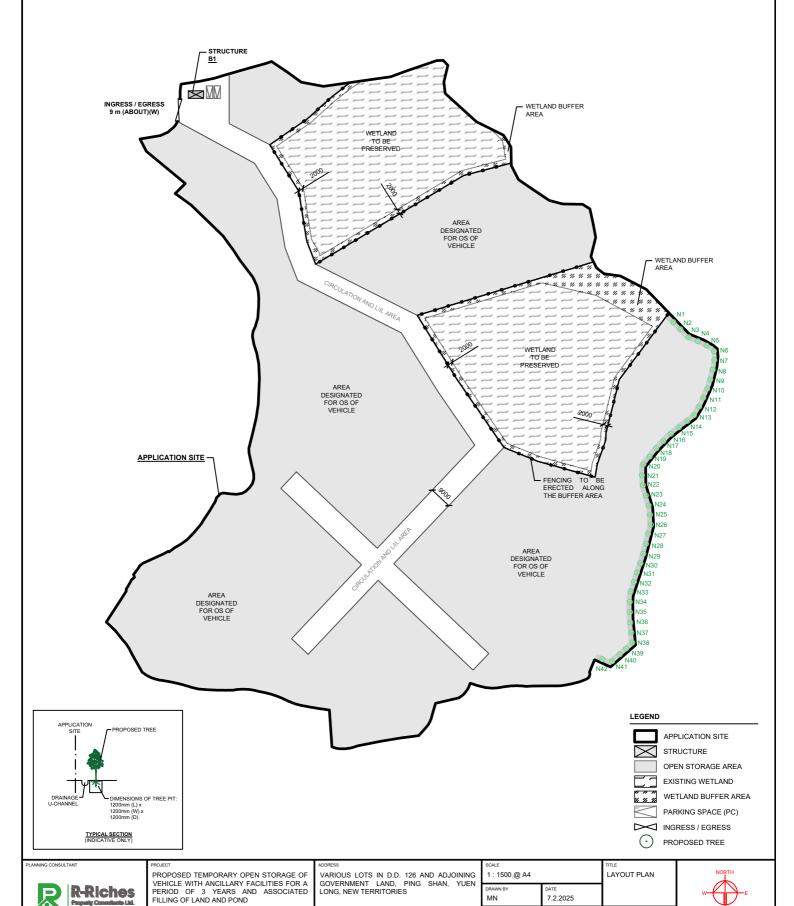
APPLICATION SITE AREA

: 41,010 m² (ABOUT)

NOS. OF TREE TO BE PLANTED SPECIES OF NEW TREES HEIGHT OF NEW TREES SPACING OF NEW TREES DIMENSION OF TREE PITS : 42 (N1-N42) : BAUHINIA x BLAKEANA : NOT LESS THAN 2.75 m : NOT LESS THAN 4 m : 1.2 m (W) X 1.2 m (L) X 1.2 m (D)

NOTES:

- THE APPLICANT WILL MAINTAIN TREES IN GOOD CONDITION DURING THE PLANNING APPROVAL PERIOD.
- THE APPLICANT WILL REPLACE TREES WHICH ARE DYING OR DEAD DURING THE PLANNING APPROVAL PERIOD.
- 3) THE APPLICANT WILL PROVIDE ADEQUATE IRRIGATION FOR TREES.



PLAN 1

002