



TOWNLAND CONSULTANTS LTD.

URBAN AND REGIONAL PLANNING, DEVELOPMENT CONSULTANCY, MASTER PLANNING, URBAN DESIGN, ARCHITECTURE,
LANDSCAPE ARCHITECTURE, PROJECT MANAGEMENT AND SOCIAL DEVELOPMENT

Reference HKHS/NCW/JANICE/04
Date 28 March 2025

By FAX and EMAIL

The Secretary, Town Planning Board
c/o Planning Department
15/F North Point Government Offices
333 Java Road, North Point, HONG KONG

Dear Sir / Madam,

**SECTION 16 PLANNING APPLICATION
THE TOWN PLANNING ORDINANCE (CHAPTER 131)**

**PROPOSED MINOR RELAXATION OF BUILDING HEIGHT RESTRICTIONS FOR PUBLIC
HOUSING DEVELOPMENT AT NGAU CHI WAN VILLAGE, KOWLOON (TPB Ref: A/K12/45)**

We write with regards to the captioned Planning Application (TPB Ref: A/K12/45) submitted to the Town Planning Board ("TPB") on 14 February 2025.

Further to comments received from the Commissioner for Heritage's Office and Antiquities and Monuments Office ("AMO") of the Development Bureau ("DEVB") and the Public, please find our responses provided in the enclosed Responses-to-Comments ("R-to-C") table in **Attachment 1** which have fully addressed the comments received. Please note that these responses are clarifications only and there are no changes to the S16 Planning Application.

Should there be any queries, please do not hesitate to contact the undersigned or Ms Janice Wong.

Thank you for your assistance.

Yours faithfully,
FOR AND ON BEHALF OF
TOWNLAND CONSULTANTS LIMITED


Vincent Lau
Associate Director

VIN/JANICE/yv

Enc Attachment 1: R-to-C table

cc Client / Team
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PT TOWNLAND INTERNATIONAL (Indonesia)

HOWARD & SEDDON PARTNERSHIP (United Kingdom)



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Attachment 1

	RESPONSES-TO-COMMENTS TABLE
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Proposed Minor Relaxation of Building Height Restrictions for Public Housing Development at Ngau Chi Wan Village, Kowloon
(TPB Ref. A/K12/45)

Responses to Comments Table

Comments/ Suggestions	Applicant/ Consultant's Responses
<p>A.</p> <p>Comments from Commissioner for Heritage's Office and Antiquities and Monuments Office of the Development Bureau received from Planning Department on 27.03.2025:</p> <p>(Contact person: Ms. LIN Ho Yan, Fion, Tel no.: 2655 0830)</p>	
<p>1. A joint reply of the Commissioner for Heritage's Office and the Antiquities and Monuments Office ("AMO") of the Development Bureau from the heritage conservation perspective is set out below.</p> <p>The Man Fat Nunnery, a Grade 3 historic building, (the "Grade 3 building"), is located within the application site. According to the submission, the Grade 3 building will be preserved <i>in-situ</i> for adaptive reuse and public appreciation, with a Conservation Management Plan to be submitted for AMO's consideration. To properly manage the changes to the Grade 3 building and duly conserve its character-defining elements, the following approval conditions are recommended:</p> <p>"(a) The submission of a Conservation Management Plan (CMP) for the conservation of Man Fat Nunnery prior to commencement of any works and implementation of the works in accordance with the CMP to the satisfaction of the Antiquities and Monuments Office (AMO) of the Development Bureau (DEVB) or of the Town Planning Board (TPB); and</p> <p>(b) the provision of public appreciation arrangement details to the satisfaction of the AMO of DEVB or of the TPB."</p>	<p>Please be advised that the purpose of this S16 Planning Application is to seek for minor relaxation of ("BH") restrictions for the permitted Public Housing Development only which would have no impact to the heritage preservation of the existing Grade 3 historic building, Man Fat Nunnery ("MFN"). In taking forward Government's housing initiative for the redevelopment of NCWV as outlined in the "Agreement No. CE 32/2019 (CE): Site Formation and Infrastructure Works for Proposed Public Housing Developments at Ying Fung Lane, Wong Tai Sin Community Centre and Ngau Chi Wan Village, Wong Tai Sin – Feasibility Study" (the "Feasibility Study") undertaken by the Civil Engineering and Development Department ("CEDD"), as well as the subsequent statutory planning procedures under the Town Planning Ordinance to amend the Approved Ngau Chi Wan Outline Zoning Plan No. S/K12/16 in 2022-23, HKHS has been committed to retain MFN in-situ for adaptive reuse and to be integrated into the Proposed Development. MFN is preliminarily proposed to be revitalised for commercial uses and will be allowed for public enjoyment and appreciation to facilitate public education on appreciation of cultural heritage and community culture, subject to further review at the detailed design stage.</p> <p>Taking forward the recommendations in the Feasibility Study in support of the Draft Ngau Chi Wan Outline Zoning Plan No. S/K12/17, the Explanatory Statement ("ES") of the subject "R(A)1" zone in the prevailing Approved Ngau Chi Wan OZP No. S/K12/18 gazetted in May 2023 states that a Heritage Impact Assessment ("HIA") will be conducted in accordance with the prevailing Government's Technical Circular and in consultation with AMO of DEVB in the design stage of site formation and infrastructure work.</p> <p>To this effect, a HIA for the Project Site was commissioned by CEDD during the "Agreement No. CE 19/2022 (CE) Infrastructure Works for Public Housing Developments at Chuk Yuen United Village and Ngau Chi Wan Village, Wong Tai Sin – Investigation, Design and Construction" (the "IDC Study") and was endorsed by the Antiquities Advisory Board ("AAB") on 7 September 2023. Due consideration was made to properly manage the changes to MFN and conserve its character-defining elements in the HIA and a list of proposed treatment and mitigation measures were</p>

Comments/ Suggestions		Applicant/ Consultant's Responses
2.	<p>The proposed development is adjacent to Man Fat Nunnery and three Grade 2 historic buildings, namely the Gate House, Villa and Dormitory A of St. Joseph's Home for the Aged. Their photos, location plans and appraisals are available on the following website of the Antiquities Advisory Board (https://www.aab.gov.hk/en/historic-buildings/search-for-information-on-individual-buildings/index.html). The project proponent should ensure that the structural integrity and historic fabrics of the aforementioned graded buildings will not be adversely affected by the proposed works. AMO will offer technical advice from the heritage conservation perspective upon receipt of the related submissions. The project proponent is also reminded to carry out the proposed mitigation measures as stipulated in the Heritage Impact Assessment (HIA) Report (for Ngau Chi Wan Village site only) (Ref: A12-04 dated July 2023) which was endorsed by the Antiquities Advisory Board on 7 September 2023.</p>	<p>recommended.</p> <p>As part of discussions with Government in respect to the Land Grant, relevant conditions in respect to the heritage preservations of MFN will be imposed as required.</p> <p>Preparation of a Conservation Management Plan (“CMP”) by HKHS in consultations with AMO is ongoing since 2023 in order to develop a competent revitalisation proposal and appropriate heritage measures of MFN that satisfy the recommendations of the endorsed HIA as well as the interests and preferences of AMO and AAB.</p> <p>In this regard, the Applicant opines that the recommended approval conditions relating to CMP and public appreciation arrangement details is not necessary.</p> <p>Noted.</p>
3.	Please keep AMO posted of any further development / updates of the subject application.	Noted.
B. Public Comments		
1.	<p>A total of 13 public comments were received during the public commenting period for the subject S16 Planning Application, and are summarised as follow:</p> <p>Increasing building heights may increase urban density and lead to overcrowding, which may overwhelm the already strained infrastructure and public facilities, including transportation, demand on sewage systems and community amenities, as well as leading to potential air and noise pollution.</p>	<p>This S16 Planning Application seeks minor relaxation of BH restrictions, with no change to the permitted Plot Ratio (“PR”) restriction under the prevailing Approved Ngau Chi Wan Outline Zoning Plan No. S/K12/18 when compared to the Baseline Scheme. The Proposed Development will deliver a range of community and social welfare facilities to serve local residents, alongside essential healthcare and support services. It will also include a community hall and retail offerings while retaining an existing key healthcare service in the area. Furthermore, The S16 Planning</p>

Comments/ Suggestions	Applicant/ Consultant's Responses
<p>2. The proposed increase in building height will obstruct natural ventilation and sunlight, intensifying air pollution, "wall effect" reducing air circulation and worsening urban heat island effect. This poses physical and mental health risks for vulnerable populations like the elderly and children. Studies should be conducted to assess the potential environmental impacts.</p> <p>3. Additional population brought by the Proposed Development could lead to severe congestion and create more burdens on the existing transportation and road networks which are already overburdened.</p> <p>4. The Proposed Development may lead to loss of existing valuable green spaces and recreational areas, and generate pressure on the demand of open spaces and greenery area, which affect residents' quality of life. Also, construction of the Proposed Development may destroy local flora and fauna including old trees that benefits the ecosystem.</p>	<p>Application has reviewed various technical considerations and conducted various technical assessments that conclude no adverse visual, air ventilation, traffic, environmental and infrastructural impacts anticipated as a result of the minor relaxation in BH restriction.</p> <p>An Environmental Assessment, Air Ventilation Assessment and Visual Impact Assessment ("VIA") were conducted to evaluate the proposed minor relaxation of BH restrictions, which concludes that there are no significant adverse environmental, air ventilation and visual impacts anticipated when compared to the Baseline Scheme in support of the Draft Ngau Chi Wan Outline Zoning Plan No. S/K12/17. The Proposed Development has also incorporated effective good design features such as maintaining building separations and setbacks along the site boundary near the air paths and between the three towers. The Proposed Development has holistically taken into account the building design and layout when compared to the Baseline Scheme. Notably, the empty bay design from tower to podium level has been strategically repositioned from tower to podium level to enhance air ventilation in pedestrian levels. The Proposed Development also includes additional accessible landscaped open spaces at podium levels which were not featured in the Baseline Scheme to achieve better air ventilation, visual permeability and enhance the environmental quality of our living space with provision of more greenery to mitigate the "wall effect" and urban heat island effect.</p> <p>The S16 Planning Application seeks minor relaxation of BH restrictions, with no changes to the permitted PR restriction under the prevailing Approved Ngau Chi Wan Outline Zoning Plan No. S/K12/18 imposed on the Development Site. The Proposed Development has abode with the key planning parameters (i.e. number of flats, design years, etc.) given in both the Preliminary Traffic and Transport Impact Assessment ("Preliminary TTIA") Report under the Feasibility Study and the Traffic and Transport Impact Assessment ("TTIA") Report under the IDC Study conducted by CEDD. As such, it is considered that the findings of both the Preliminary TTIA and TTIA are still valid and the traffic impact of the current scheme on the surrounding roads, pedestrian networks and public transport services would not deviate from the findings of CEDD's Feasibility Study and IDC Study, which demonstrated that no significant adverse traffic impacts on the surrounding transportation and road networks are anticipated.</p> <p>Adequate open space and greenery provision is envisaged within the Proposed Development in accordance with the recommendations of HKPSG to provide high-quality residential recreational facilities, with provision of local open space of not less than 1m²/person for the enjoyment of residents. The Proposed Development will adopt a terraced multi-layered podium with landscaped open spaces which serve as landscaped buffers / green visual relief to support a more vibrant, active and integrated communal open space environment. Importantly, there is no change to the development of Site D2 (located between Site C and Site D1 and not part of this S16 Planning Application) as a Public Open Space ("POS") to be maintained and</p>

Comments/ Suggestions	Applicant/ Consultant's Responses
<p>5. The Proposed Development will result in significant visual impact including creating intrusion of ridgeline and make the area feel more enclosed and visually overwhelming. The high-rise development would create an oppressive atmosphere and diminishing the openness that residents currently enjoy.</p> <p>6. The proposed height increase is not justified, as it only provides 25 additional flats and reduces the GFA of community facilities. The height increase appears to be accommodating more parking spaces only and encourage increased ownership of polluting vehicles.</p> <p>7. Ngau Chi Wan Village is of high historical significance. Its redevelopment may destroy the existing historic structures and threaten the survival of small and local business, risking the loss of cultural heritage and community identity.</p> <p>8. There is a lack of transparency of the planning process and of public</p>	<p>managed by the Leisure and Cultural Services Department ("LCSD") upon completion.</p> <p>Furthermore, the Proposed Development will retain a total of ten trees including two Trees of Particular Interests at the Project Site (one located within the Application Site), while introducing approximately 200 new trees across the Development Site.</p> <p>The VIA concludes that while the increase in BH in the Proposed Development will introduce minor visual changes from the Baseline Scheme, such changes are considered acceptable given the comprehensive mitigation measures incorporated into the Proposed Development, such as variation in building form, landscaping and greenery provision at at-grade and podium levels and incorporation of tower setback/separation. It is considered not incompatible with the surrounding context, particularly on massing, scale and height. As demonstrated in the Strategic Viewpoints in the VIA, the Proposed Development will preserve the open sky view, the panoramic view of the Victoria Harbour and the ridgeline, with no intrusion to the 20% Building Free Zone.</p> <p>The proposed minor relaxation of BH restrictions allows for the promulgation of a better design of the Proposed Development with the associated non-domestic facilities and the incorporation of an aboveground carpark and podium garden to enhance the local amenity provision without compromising the flat supply.</p> <p>While the flat number is slightly adjusted due to modification of tower layout to address the technical concerns, the proposed PR remains unchanged when compared to the Baseline Scheme.</p> <p>A host of community facilities have been provided in the Proposed Development to support residents and the wider community. The proposed internal transport provisions for the proposed residential, commercial and GIC facilities are in line with the requirements of the HKPSG recommendations.</p> <p>The conceptual design of the Proposed Development seeks to complement the character of the urban squatter areas at Ngau Chi Wan Village and respond to its historic background with contemporary and sustainable design principles which pays respect to the historical significance of existing historic structures.</p> <p>The existing Grade 3 historic building, Man Fat Nunnery, will be preserved in-situ. It will be revitalised for non-domestic uses, allowing for public enjoyment and appreciation which will facilitate public education on appreciation of cultural heritage and community culture. The revitalisation proposal is subject to review at the detailed design stage.</p> <p>The at-grade retail streets in the Proposed Development also aims to infuse heritage elements with respect to the local retail character of the Ngau Chi Wan Village squatter area and emphasize its historic ties to the new generations, with the Fusion Lane integrating the old city fabric of Lung Chi Path.</p> <p>The NCWV Redevelopment is one of the Government's Housing Initiatives, as outlined in the Chief Executive's 2019 to 2021 Policy Addresses, to increase the</p>

Comments/ Suggestions	Applicant/ Consultant's Responses
<p>consultation in regarding to the Proposed Development.</p> <p>9. Some commenters advocate for exploration of alternative sites or land use options and incorporation of sustainable design practices that prioritize environmental quality and community well-being over increasing building heights.</p>	<p>supply of adequate and affordable housing with a view to rebuilding a new community therein. Taking forth the policy initiatives, CEDD commenced the Feasibility Study to investigate the long-term land use of NCWV and the site formation and infrastructure works required at the Rezoning Stage. Taking forward the recommendations of the Feasibility Study by CEDD, statutory planning procedures under the Town Planning Ordinance to amend the Approved Ngau Chi Wan Outline Zoning Plan No. S/K12/16 was undertaken in 2022-23 with a view to rezoning the Application Site (to R(A)1) to facilitate the proposed high-density public housing development by the Government.</p> <p>Public Consultations on the proposed high-density public housing development by the Government includes consultations with Wong Tai Sin District Council undertaken in July 2020 and May 2022 respectively, as well as the public representations, the comments on representations and the consideration of public representations and comments by the Town Planning Board undertaken in 2022. The proposed high-density public housing development is envisaged in the prevailing Approved Ngau Chi Wan Outline Zoning Plan No. S/K12/18 gazetted on 5 May 2023.</p> <p>In order to promulgate a better design of the Proposed Development with the associated non-domestic facilities and the incorporation of an aboveground carpark and podium garden to enhance the local amenity provision without compromising the flat supply, the proposed minor relaxation of BH restrictions was sought under this S16 Planning Application. Per the established S16 Planning procedures under the Town Planning Ordinance, the S16 application has been made available for public inspection and public commenting for the first three weeks of the public inspection period.</p> <p>Please be advised that this S16 Planning Application seeks for minor relaxation of BH restrictions only. The Proposed Development has strived to promulgate a better and sustainable design to address site constraints while offering a number of planning and design merits including improvement of the pedestrian realm/streetscape and connectivity to the local area, facilitate the visual and air permeability to better serve the local community without compromising housing supply.</p>

It is noted that the following Government Department has no objections to / no adverse comments to the S16 Planning Application:

- Development Bureau (received on 27/03/2025)

Date: 28 March 2025
File Ref: HKHS/NCW