

Section 16 Application for Proposed  
Minor Relaxation of Building Height  
Restriction for Permitted House  
development in “Residential (Group  
C)2” Zone at Lot No. 214 in D.D. 219 &  
the Extension thereto and Adjoining  
Government Land, Tin Shek Road, Sai  
Kung, New Territories

Updated Supporting Planning Statement

V3 | April 2025

This report takes into account the particular  
instructions and requirements of our client.  
It is not intended for and should not be relied  
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# Executive Summary

Pursuant to Section 16 of the Town Planning Ordinance (TPO), this Supporting Planning Statement is prepared and submitted to seek approval from Town Planning Board (TPB) for Proposed Minor Relaxation of Building Height (BH) restriction for Permitted House development (Proposed Scheme) in the “Residential (Group C)2” (“R(C)2”) zone at Lot No. 214 in D.D. 219 & the Extension thereto and Adjoining Government Land, Tin Shek Road, Sai Kung, New Territories (the Application Site).

The Application Site, with an area of about 681.4m<sup>2</sup>, is currently occupied by a 3-storey House with BH of 7.5m for residential purpose. It is situated within a predominantly low-dense residential neighbourhood in Sai Kung. It falls within the “R(C)2” zone on the **Draft Ho Chung Outline Zoning Plan (OZP) No. S/SK-HC/12**, which is intended “*primarily for low-rise, low-density residential developments where commercial uses serving the residential neighbourhood may be permitted on application to the TPB*”. According to the Notes of “R(C)2”, the Application Site is subject to a maximum plot ratio (PR) of 0.4, site coverage (SC) of 20% and BH of 9m with 2 storeys over one storey of carport, or the PR, SC and height of building which was in existence on the date of the first publication in the Gazette of the notice of the interim development permission area plan, whichever is the greater.

The Proposed Scheme involves redevelopment of an existing House, which is a Column 1 use always permitted under the “R(C)2” zone. The Proposed Scheme comprises of a PR of not more than 0.4, SC of not more than 20% and a BH of 2 storeys over one storey of basement carpark. The proposed minor relaxation of BH from 9m to 11.3m is intended to accommodate **a habitable headroom for modern residential needs**, as well as a basement carpark that fulfil operational requirements **and address site constraints**. It is worth to note that the resultant BH is only 2 storeys (8m) visible from ground floor, as compared to the BH restriction of 9m visible from ground floor, while fully compatible with the surrounding context. A Tree Survey Report, Geotechnical Planning Review, as well as **Studies on Internal Transport Provision and Access** have been prepared in support of the planning application.

In summary, the proposed minor relaxation of BH is fully justified due to the following reasons:

- In-line with the Planning Intention of the “R(C)2” Zone;
- **Fulfil Modern Habitable Needs in Post-Pandemic Era and Operational Requirement for Basement Carpark**
- Fully Compatible with the Surrounding Neighbourhood;
- Proven Technically Feasible and Resulting in NO Adverse Impacts on Surrounding Environment; and
- Setting a Desirable Precedent for Minor Relaxation of Building Height with Individual Merits.

The Applicant has demonstrated his genuine intention and commitment in taking forward the Proposed Scheme at the Application Site. In light of the justifications put forward in this Supporting Planning Statement, we sincerely seek the favourable consideration from the TPB to give support to this Section 16 Application.

# ARUP

# 行政摘要

(內文如與英文版本有任何差異，應以英文版本為準)

本《城市規劃條例》第 16 條規劃申請旨在獲得城市規劃委員會批准，於西貢田石路丈量約份第 219 約第 214 號及延展地段和毗連政府土地的「住宅（丙類）2」地帶（「申請地點」），作擬議略為放寬建築物高度限制，以作准許的屋宇發展（擬議發展方案）。

申請地點面積約為 681.4 平方米，現時為一所樓高三層約 7.5 米高的屋宇。申請地點位於蠔涌分區計劃大綱草圖編號 S/SK-HC/12（分區計劃大綱圖）的「住宅（丙類）」地帶，其規劃意向主要是「作低層、低密度的住宅發展；服務住宅區一帶地方的商業用途，如向城市規劃委員會提出申請，或會獲得批准」。根據「住宅（丙類）2」地帶的註釋，申請地點上准許的最高地積比率為 0.4 倍，最大上蓋面積為 20%，以及最高建築物高度為 9 米（即一層開敞式停車間上加兩層）；或超過在有關中期發展審批地區圖的公告在憲報首次刊登該日已經存在的建築物的地積比率、上蓋面積和高度，兩者中以數目較大者為準。

擬議發展方案涉及重建現有屋宇，為「住宅（丙類）2」地帶內第一欄經常准許的用途。擬議發展方案的地積比率不超過 0.4、最大上蓋面積不超過 20%、建築物高度為 2 層高，並在地庫設有一層停車場。申請人擬議將現時 9 米的建築物高度限制略為放寬至 11.3 米，以提供符合現代居住需要的空間高度、滿足地庫停車場的運作需要以及回應地盤的發展限制。值得注意的是，與地面可見的 9 米建築高度限制相比，擬議發展方案的建築物高度從地面可見僅有 2 層高（8 米），完全與周圍環境兼容。申請人同時準備了樹木調查報告、岩土工程規劃檢討報告以及有關內部運輸設施及地盤出入口的交通報告以支持這項申請。

總括而言，擬議略為放寬建築物高度限制的合理原因如下：

- 符合「住宅（丙類）2」地帶的規劃意向；
- 滿足後疫情時代的宜居需求及地庫停車場的運作要求；
- 將停車場設置在地庫層以回應地盤的發展限制及符合安全通道要求；
- 完全與周邊環境兼容；
- 已證實擬議發展的技術可行性，並不會對周邊環境造成負面影響；及
- 為帶來個別增益的略為放寬建築物高度申請樹立理想的先例。

申請人對於在申請地點擬議發展方案持有誠懇和積極的態度。基於本規劃綱領所闡述的理據，我們懇請城規會支持是次第 16 條規劃申請。

# ARUP

# 1. INTRODUCTION

- 1.1.1 Pursuant to Section 16 of the Town Planning Ordinance (TPO), this Supporting Planning Statement is prepared and submitted to seek approval from Town Planning Board (TPB) for Proposed Minor Relaxation of Building Height (BH) restriction for Permitted House development (Proposed Scheme) in the “Residential (Group C)2” (“R(C)2”) zone at Lot No. 214 in D.D. 219 & the Extension thereto and Adjoining Government Land, Tin Shek Road, Sai Kung, New Territories (“the Application Site”).
- 1.1.2 The Application Site, with an area of about 681.4m<sup>2</sup>, is situated in a predominantly low-dense residential neighbourhood in Sai Kung. The Application Site, which is currently paved and occupied by a three-storey House (with an existing BH of 7.5m), can be accessed from the Hiram’s Highway via Hing Keng Shek Road to Tin Shek Road.
- 1.1.3 The Application Site falls within “R(C)2” zone on the **Draft Ho Chung Outline Zoning Plan No. S/SK-HC/12** (the OZP). The planning intention for “R(C)” zone is “*intended primarily for low-rise, low-density residential developments where commercial uses serving the residential neighbourhood may be permitted on application to the TPB*”. Moreover, according to the OZP and Remark (b) of the Notes, the Application Site is subject to a maximum plot ratio (PR) of 0.4, a maximum site coverage (SC) of 20% and a maximum BH of 9m with 2 storeys over one storey of carport, or the PR, SC and height of building which was in existence on the date of the first publication in the Gazette of the notice of the interim development permission area plan, whichever is the greater. Remark (c) indicates that minor relaxation of the PR, SC and BH restrictions may be considered by the TPB based on the individual merits of a development or redevelopment proposal.
- 1.1.4 The Proposed Scheme involves redevelopment of an existing House, which is a Column 1 use always permitted under the “R(C)2” zone. The Proposed Scheme comprises of a PR of not more than 0.4, SC of not more than 20% and a BH of 2 storeys over one storey of carpark (at basement level). This planning application is submitted to seek minor relaxation of the overall BH from 9m to 11.3m. It is worth to note that by placing the carpark at basement level, only 8m of the Proposed Scheme (residential portion) will be visible from ground level, as compared to the BH restriction of 9m visible from ground floor. Moreover, the Proposed Scheme proposed **an extended access point at the northern part of the Application Site to enhance overall safety and allow carparking to be provided on-site.** In summary, the Proposed Scheme is in line with the planning intention and fully compatible with the low-dense residential neighbourhood, **while at the same time, fulfil modern operational needs for living environment, safe access and basement carparking.**
- 1.1.5 This Supporting Planning Statement is to provide TPB to ascertain the technical feasibility of the Proposed Scheme for this Section 16 Application. It is structured as below:
- **Section 2** provides a brief description of the Application Site and its surrounding context;
  - **Section 3** presents the planning context of the Application Site;
  - **Section 4** details the Proposed Scheme in relation to general planning and design principles, and key development parameters;

- **Section 5** illustrates the planning justifications in support of this Planning Application; and
- **Section 6** concludes the Supporting Planning Statement.

1.1.6 We sincerely seek favourable consideration from the TPB to grant approval to this Section 16 Application.

## 2. SITE CONTEXT

### 2.1 Location

- 2.1.1 The Application Site is located on Tin Shek Road, Sai Kung and situated in a predominantly low-density residential neighbourhood. The Application Site is accessible from the Hiram's Highway via Hing Keng Shek Road to Tin Shek Road.
- 2.1.2 Please refer to **Figure 2.1** for the location plan of the Application Site.

### 2.2 Land status

- 2.2.1 The Application is held under Lot No. 214 in D.D. 219 & the Extension thereto and adjoining Government Land with the total site area of about 681.4m<sup>2</sup>. About 558m<sup>2</sup> (or about 82%) of the Application Site is solely owned by the Applicant. The remaining parts of the Application Site (123.4m<sup>2</sup>, i.e. about 18%) are comprised of Government land.
- 2.2.2 Please refer to **Figures 2.2** for the lot index plan of the Application Site.
- 2.2.3 The Applicant will submit a land exchange application to facilitate the proposed house redevelopment on the Application Site upon approval of this planning application.

### 2.3 Existing Land Use

- 2.3.1 The Application Site is currently occupied by a 3-storey House, with a BH of about 7.5m, on the existing private lot, while the northern and southern portions of the Application Site (within Government land) are currently paved with roadside planting of low to medium amenity value.
- 2.3.2 Please refer to **Figure 2.3** for the existing condition of the Application Site.

### 2.4 Surrounding Land Use

- 2.4.1 The Application Site is situated within a predominantly rural residential neighbourhood comprising low-rise, low-density residential and village type developments.
- 2.4.2 To the **immediate north** and **northeast** of the Application Site are all 3-storey village Houses along the Tin Shek Road and Yuk Shek Lane in the adjacent "V" zones. 3-storey village Houses can be found in the Sam Fai Tin "V" zone located at the northern end of Hing Keng Shek Road.
- 2.4.3 To the **immediate east** of the Application Site are 3-storey Houses along Mau Tin Lane within the same "R(C)2" zone. Clusters of low-rise 3-storey village Houses within "V" zone, such as the Hillview Lodge and Bernard Garden, can be found.
- 2.4.4 To the **immediate south** of the Application Site is 3-storey Houses along Tin Shek Road within the same "R(C)2" zone. To the **further southeast** of the Application Site is zoned "Green Belt" ("GB") extending to the Hiram's Highway.



- 2.4.5 To the **immediate west** and **northwest** of the Application Site are mainly 3-storey Houses within the same “R(C)2” zone. To the **further west** across the “R(C)2” zone is the Ma On Shan Country Park.
- 2.4.6 All in all, the surrounding context of the Application Site is mainly low-rise and low-dense residential/ village development surrounded by lush vegetation. Please refer to **Figures 2.4** for the surrounding context of the Application Site.

## **2.5 Accessibility**

- 2.5.1 The existing access point of the Application Site locates along its eastern boundary, providing direct connection with Tin Shek Road. Tin Shek Road is a 3.5m wide rural road which connects to Hing King Shek Road, and further to the Hiram’s Highway, linking the Application Site to other parts of Sai Kung, Kowloon East and Tseung Kwan O.
- 2.5.2 The Application Site is also served by public transport services (e.g. Bus routes 92, 96R, 292P and 792M) located near the Pak Wai Roundabout of the Hiram’s Highway (about 1.4km from the Application Site), in which provide convenient connection to Sai Kung town centre and other urban areas such as Causeway Bay, Mong Kok and Kwun Tong, etc.

### 3. PLANNING CONTEXT

#### 3.1 Land Use Zoning

- 3.1.1 The Application Site falls within “R(C)2” zone under the **Draft Ho Chung OZP No. S/SK-HC/12**. According to the Notes of the OZP, the planning intention for the general “R(C)” zone is for *“low-rise, low-density residential developments where commercial uses serving the residential neighbourhood may be permitted on application to the TPB”*. It should also be noted that ‘House’ is a Column 1 use which is always permitted under the “R(C)” zone.
- 3.1.2 Remark (b) in the Notes specify that on land designated “R(C)2”, *“no new development, or addition, alteration and/or modification to or redevelopment of an existing building shall result in a total development and/or redevelopment in excess of a maximum plot ratio of 0.4, a maximum site coverage of 20% and a maximum building height of 9m with 2 storeys over one storey of carport, or the plot ratio, site coverage and height of the building which was in existence on the date of the first publication in the Gazette of the notice of the interim development permission area plan, whichever is the greater”*.
- 3.1.3 Remark (c) in the Notes also states that *“based on the individual merits of a development or redevelopment proposal, minor relaxation of the PR, SC and BH restrictions may be considered by the TPB on application under section 16 of the TPO”*.
- 3.1.4 Please refer to **Figures 3.1a to 3.1d** for the extracts of the Notes, Schedule of Uses, and Explanatory Statement (ES) of the **Draft Ho Chung OZP No. S/SK-HC/12**.

#### 3.2 Reasonable Headroom for Health and Well-being in Post-Pandemic Era

- 3.2.1 With reference to PNAP APP-5 (updated in May 2019), the minimum height of rooms for habitation or office for health reason is 2.5m. It is also stated that *“a range of storey height for domestic buildings may be accepted by Buildings Department (“BD”) for the purpose of regulation 23(3) (a) of the Building (Planning) Regulations (“B(P)R”) provided that the proposed height of storeys does not exceed the following maximum heights”*:

Flat	House
Topmost floor – 4m*	4.5m
Typical floor – 3.5m	

\*Where the topmost floor consists of duplex or triplex units, the maximum height of topmost floor can only be applied to only one storey of the duplex or triplex units”.

- 3.2.2 After the COVID-19 pandemic, public’s concerns on indoor air ventilation have grown overtime. References are observed on the positive correlation of floor-to-floor-height and indoor air ventilation performance. Higher floor-to-floor-heights would contribute to greater volume of the House, which would increase and facilitate more significant air

movement and reduce resistance to air flow<sup>1</sup>. Spaces with higher floor-to-floor-height would be more optimal for natural displacement ventilation<sup>2</sup>. Therefore, providing a higher floor-to-floor height could achieve a healthier living environment.

3.2.3 In addition, references have been made to a number of approved S.16 Planning Applications for ‘House’ development by the in “R(C)” zones (Please refer to **Table 3.1** below). In addition, market research on recent sales brochure for House development in similar “R(C)” zones can be found in **Table 3.2**. Both findings reveals that it is typical for a floor-to-floor height of 4.5m on ground levels and floor-to-floor height ranging of at least 3.5m for upper floors for ‘House’ developments in similar context.

**Table 3.1 References of Minor Relaxation of BH Restriction for House Use in “R(C)” Zones**

Year	Application No.	Approved Floor-to-Floor Height
2022	A/K18/342	4.5m for G/F and 3.5m for 1-2/F
	A/H14/84	4.5m for 1-2/F
	A/H18/88	4.5m for G/F and 3.5m for 2-6/F
2016	A/K7/112	4.5m for G/F and 3.5m for 1/F
2015	A/H14/76	4.5 for G/F and 3.5 for 1-2/F

(Source: Town Planning Board website)

**Table 3.2 Available Information from Sales Brochure for House Development in “R(C)” Zones**

Year	Property Name	Floor-to-Floor Height Shown on Sales Brochure
2025	No. 6 Stanley Beach Road	4.5m for G/F and 3.5m for 1/F
	Cadenza Phase 1	4.5m for G/F and 3.5m for 1/F
2024	Mt. La Vie	4.5m for G/F and 3.85m for 1/F
	Altissimo	4.5m for G/F and 3.5m for 1/F
	No. 15 Shouson	4.5m for G/F and 3.7m for 1/F
	One Stanley	4.5m for G/F and 3.5m for 1/F

(Source: Various Property Developer websites)

### 3.3 Government’s Initiative to Encourage Carparking at Basement Levels

3.3.1 It is understood from the PNAP APP-2 (updated in December 2023), that underground carpark are being encouraged and promoted in Hong Kong to enhance utilisation of underground spaces. 100% Gross Floor Area (GFA) concession would be given to underground private and public carpark, as well as underground loading/unloading (L/UL) areas under regulation 23(3)(b) of the “B(P)R”. It is evident that the Government strives to provide incentives for underground parking facilities in response to the public concern about carpark being a contributor to building bulk and height, which has

<sup>1</sup> Benito et al., 2021. Ventilation for Residential Buildings: Critical Assessment of Standard Requirements in the COVID-19 Pandemic Context. Source: <https://www.frontiersin.org/journals/built-environment/articles/10.3389/fbuil.2021.656718/full>

<sup>2</sup> Bhagat et al., 2020. Effects of ventilation on the indoor spread of COVID-19. Source: <https://pmc.ncbi.nlm.nih.gov/articles/PMC7520710/>

considered the demand for parking spaces and the need for maintaining a sustainable built environment<sup>3</sup>.

- 3.3.2 Adhering to the principle of “*single site, multiple use*”, provision of public and private car parks at underground level is not uncommon. The additional benefit of doing so is to free up more space at ground level which enables recreational and landscaping opportunities for enjoyment, bringing greater benefits to the community and achieving optimal land use.

#### **3.4 Fulfilling Operational Requirement for Basement Carpark and Gradient Requirement for Access Roads/ Driveways**

- 3.4.1 According to PNAP APP-111 (updated in July 2019), the minimum clear headroom for private car park is 2.4m. In order to operate a carpark at basement level, on top of the 2.4m clear headroom, additional heights for floor slab (0.2m high), cable ducts (0.2m high), electrical and mechanical (E&M) zone (0.5m high) will be required.

- 3.4.2 With reference to the same PNAP, ‘Table 2- Access Roads/Driveways’ stated that straight ramp for private cars should aim to achieve a desirable gradient of 1:10, a maximum gradient of 1:7 and an absolute maximum gradient of 1:6. It is important that the House redevelopment at the Application Site, with its entrance located on a sloping topography (with an existing steep gradient of 1:4), to comply with this requirement to ensure a safe vehicular access/driveway for the future user.

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<sup>3</sup> Press Release of HKSAR Government on carparking spaces provided in development projects dated 7 July 2021. Source: <https://www.info.gov.hk/gia/general/202107/07/P2021070700367.htm?fontSize=3>

## 4. THE PROPOSED SCHEME

### 4.1 General Planning and Design Principles

- 4.1.1 Taking into consideration the aforementioned planning context and the planning intention, a set of general planning and design principles are formulated to guide the formulation of the Proposed House Redevelopment (the Proposed Scheme) on the Application Site.
- 4.1.2 **Ensuring Compatibility with Surrounding Areas** – The surrounding context of the Application Site is predominantly low-rise residential nature with 3-storey village Houses. The Proposed Scheme intends to fully respect the development restrictions of the “R(C)2” zone, including PR, SC and BH (with 2 storeys/9m visible on ground), by placing the permitted one-storey carport to basement level. The resultant BH of the Proposed Scheme visible on ground, i.e. 8m is similar to the BH of the existing House (i.e. 7.5m), ensuring compatibility with surrounding areas.
- 4.1.3 **Providing a Healthy Living Environment by Adopting a Habitable Floor-to-Floor Height** – The Applicant seeks for a reasonable floor-to-floor height (4.5m at G/F and 3.5m at 1/F) for the Proposed Scheme, which fully complies with PNAP APP-5 and comparable to recently approved planning applications and similar House development in the market as detailed in Section 3.2. The proposed floor-to-floor height is considered reasonable and provide the opportunity for enhancing the health and wellbeing outcome of future users through redevelopment.
- 4.1.4 **Minimise Encroachment to the Existing Slope** – An existing slope is located at the southwestern part of the Application Site with a site level ranged 86mPD to 88mPD, forming a part of the Application Site’s natural topography. The Proposed Scheme intends to minimize encroachment the slope (at both ground and underground) to maintain slope stability and prevent slope failure. This could help to safeguard road users on Tin Shek Road from potential hazards.
- 4.1.5 **Maintaining the Existing Retaining Wall for Public Safety** – Maintaining the existing retaining wall of about 0.5m tall around the Application Site helps to ensure slope stability and safety by preventing soil erosion and landslides, which could otherwise pose risks to both the structures within the Application Site and nearby road network (e.g. Tin Shek Road and Mau Tin Lane).
- 4.1.6 **Maintaining Existing Trees on the Retaining Wall for Landscape Amenity and Visual Buffer** – Retaining the existing retaining wall intact also allows 23 nos. of existing trees to be retained in-situ along the western boundary. This will help enhancing the landscape amenity along Tin Shek Road. Retaining the existing trees would also screen-off any visual impact brought by the BH relaxation (0.5m) within the Application Site. Taking into account of the existing tree structures and canopies, the proposed House structure would need to be further setback to ensure their healthy and sufficient growth in long-term.
- 4.1.7 **Complying to the Modern Parking Requirement On-Site** – The House redevelopment needs to comply the modern parking standard. According to the high-end requirement under the HKPSG, a total of 4 car parking spaces (including 1 accessible parking space

and 1 visitor parking) and 1 L/UL bay will be required. With the opportunity brought by redevelopment, the Applicant is intended to provide the required parking within the Application Site boundary to avoid congestions/ blockage on the already narrow Tin Shek Road.

**4.1.8 Improvement to the Existing Sub-standard Entrance for Vehicular Access** – The existing narrow entrance of about 5m wide does not provide adequate space for vehicles access into the Application Site. The existing entrance location is also considered unfavourable from visibility point of view. To address this, it is proposed to relocate the entrance to a new location at the northern part of the Application with an extended width of about 15m Site (currently fall within Government land). This entrance arrangement would enhance visibility along Tin Shek Road and an adequate vehicular access to the Application Site.

**4.1.9 Overcoming the Steep Site Level Difference from Tin Shek Road for Safe Access** – The northern part of the Application Site (i.e. the proposed entrance) presents substantial challenge due to a steep site level difference between Tin Shek Road (82.9mPD) and existing development platform (85.5mPD), with a gradient of about 1:4. The existing 1:4 gradient exceed the desirable gradient of 1:10 and the absolute maximum gradient of 1:6 for access roads/ driveways required in the PNAP APP-111. In order to accommodate a safe access to the development platform (G/F) of the Application Site, a 19m to 25.5m long ramp would be required to achieve the absolute maximum gradient of 1:6 and desirable gradient of 1:10 respectively (Please refer to **Appendix F**, which studies different access and parking options on ground floor). Together with the provision of 4 nos. of parking spaces and 1 no. of L/UL bay on-site (as mentioned in **Section 4.1.7**), the remaining area on ground floor will be inadequate for House redevelopment. Therefore, it is considered more efficient to divert the vehicular ramp and parking to basement level.

**4.1.10 Fulfilling Operational Requirements for Basement Carparking** – A straight ramp from Tin Shek Road with an absolute maximum gradient of 1:6 could be provided to serve one-level of basement carpark. The proposed excavation at the basement level would be minimized to avoid encroachment to the existing slope while not compromising the parking and manoeuvring requirement for parking and loading/unloading. The floor-to-floor height of the basement carpark will also need to observe the operational requirements (i.e. total 3.3m) as discussed in **Section 3.4**.

**4.1.11** Please refer to **Figure 2.5** for the summary of site constraints and **Appendix A** for the Architectural Drawings of the Proposed Scheme.

## **4.2 Building Design**

**4.2.1** Taken the consideration of **Section 4.1**, the Proposed Scheme represents a redevelopment of an existing House to address the major site constraints and fulfil modern operational requirements.

**4.2.2** The Proposed Scheme comprises of a 2-storey House development above 1 storey of carpark at basement (8m aboveground and 3.3m underground), with a PR of not more than 0.4 and SC of not more than 20%.

4.2.3 The disposition of the proposed House will avoid encroachment with the existing slope and setback from the existing trees along the western and southwestern boundary of the Application Site. The floor-to-floor height of the proposed House will be 4.5m on G/F (e.g. entrance, living and dining areas) and 3.5m on 1/F (e.g. other bedrooms), which is also comparable to a number of precedent developments in a similar context. The remaining area of the G/F will serve as local open space serving the future House users.

4.2.4 To overcome the constraint of steep site level differences near the extended entrance at the northern part of the Application Site, the Proposed Scheme provides a straight car ramp with a gradient of 1:6, allowing a safe access for vehicles from Tin Shek Road (at 82.9mPD) to the basement carpark (at 82.35mPD). The extent of the basement carpark is also kept minimum to avoid encroachment to the existing slope while not compromising the parking and manoeuvring needs for 4 nos. of car parking spaces and 1 no. of L/UL bay. The floor-to-floor height of the basement carpark is at reasonable level of 3.3m, which includes 2.4m clear headroom for parking, 0.2m for cable ducts, 0.2m E&M zone and 0.2m floor slab.

4.2.5 To fulfil accessibility and mobility needs for elderly residents in the redeveloped House, a lift is proposed connecting B/F, G/F and 1/F. Nonetheless, the area of the proposed lift shaft with the E&M facilities above 1/F would be less than 50% of the floor area of the House, respecting JPN No.5.

4.2.6 Please refer to **Appendix A** for details of the Architectural Scheme and Diagrammatic Sections.

### 4.3 Key Development Parameters

4.3.1 The key development parameters of the Proposed Scheme are summarised in **Table 4.1** below.

**Table 4.1 Key Development Parameters of the Proposed Scheme**

Major Development Parameters	Development Parameters of "R(C)2" zone under the OZP (a)	Proposed Development Parameters (b)	Differences (b) - (a)
Site Area (m <sup>2</sup> ):	N/A	About 681.4m <sup>2</sup>	-
Plot Ratio	Not more than 0.4	Not more than 0.4	-
Gross Floor Area	Not more than 272.5m <sup>2</sup>	Not more than 272.5m <sup>2</sup>	-
Site Coverage:	Not more than 20%	Not more than 20%	-
Building Height (m)	9m	11.3m <ul style="list-style-type: none"> <li>8m (aboveground)</li> <li>3.3m (below ground)</li> </ul>	+2.3m
No. of Units	N/A	2	-
No. of Storeys	2 storeys over 1 storey of carport	2 storeys with 1 storey of basement carpark	-
Floor-to-Floor Height	N/A	3.5m for 1/F 4.5m for G/F 3.3m for B/F	-
Car Parking Spaces	N/A	4 (incl. 1 accessible carparking space and 1 visitor carparking space)	4
L/UL Bay	N/A	1	1

## 4.4 Tree Survey and Landscape Plan

- 4.4.1 There are 25 nos. existing trees (including 1 dead tree) within the Application Site. There is no tree registered as Old and Valuable Trees, or being Rare or Precious Species.
- 4.4.2 Majority of the existing trees are in poor to average in condition (form, health, structure) and are with low to medium amenity value. Many possess defects such as imbalanced form, leaning, with major cavity, cracks, splits, low in suitability and survival rate after transplanting. 23 nos. of existing trees, which are currently located on the existing retaining wall are proposed to be preserved while 2 nos. of trees will be transplanted to the southern part of the Application Site.
- 4.4.3 Please refer to the Tree Survey Report and Landscape Plan in **Appendix B and C** respectively for details.

## 4.5 Geotechnical Planning Review

- 4.5.1 According to the findings of the Geotechnical Planning Review Report (GPRR), the Proposed Scheme is considered to be geotechnically feasible to be implemented within the Application Site. The man-made slopes no. 7SE-D/CR150 and 7SE-D/R46 adjacent to the Application Site would be slightly affected by the proposed redevelopment. Minimum encroachment to the existing slope within the Application Site boundary would also prevent future slope failure and maintain slope stability.
- 4.5.2 Detailed design of foundation, excavation and lateral support works, and site formation works with full assessment will be submitted in future to the Building Authority's for approval before commencement of building works in order to avoid adverse effect from the proposed works on the adjacent features.
- 4.5.3 Please refer to the GPRR in **Appendix D** for details.

## 4.6 Internal Transport Arrangements

- 4.6.1 The proposed access point, with a width of about 15m, is located in the north of the Application Site, allowing for a more efficient and safer entry and exit for vehicles. A straight car ramp with a gradient of 1:6 is proposed connecting Tin Shek Road (82.9mPD) to the basement carpark level (85.5mPD), ensuring safe and smooth vehicular movement as well as avoid tailing back to Tin Shek Road.
- 4.6.2 The provision of internal transport facilities fulfils the high-end requirement of the HKPSG, in which 4 nos. of private car parking spaces (including 1 no. of accessible parking space and 1 no. of visitor parking space) and 1 no. of L/UL bay are proposed at the basement level of the Proposed Scheme, within the Application Site.
- 4.6.3 Please refer to the Justifications for Internal Transport Facilities in **Appendix E** for details.



## 5. PLANNING JUSTIFICATIONS

### 5.1 In-line with the Planning Intention of the “R(C)2” Zone

- 5.1.1 According to the Notes of the OZP for “R(C)” zone, the planning intention of the “R(C)” zone where the Application sits in is intended for “*low-rise, low-density residential developments where commercial uses serving the residential neighbourhood may be permitted on application to the TPB*”. The Proposed Scheme involves redevelopment of an existing House, which is a Column 1 use always permitted under the “R(C)” zone. The Proposed Scheme fully respects the development restrictions specific for the “R(C)2” zone, which comprises of a **maximum** PR of not more than 0.4, **maximum** SC of not more than 20% and a **maximum** BH of 2 storeys over one storey of **carport**.
- 5.1.2 The purpose of this planning application is to seek for minor relaxation of BH of 9m to 11.3m (i.e. +2.3m), to accommodate the modern headroom requirements for the always permitted ‘House’ (8m) and **basement** carpark use (3.3m). It is important to note that the Applicant is intended to reduce the BH of the Proposed Scheme by locating the carpark to basement level at his own cost. This means that only 8m of the Proposed Scheme will be visible from the ground level, similar to the BH of the existing House (i.e. **7.5m**). Therefore, the Proposed Scheme is considered generally in line with the planning intention of “R(C)2” zone and will not jeopardise the general BH profile of the area (i.e. maximum BH of 9m with 2 storeys over one storey of carport).

### 5.2 Fulfil Modern Habitable Needs in Post-Pandemic Era and Operational Requirement for Basement Carpark

- 5.2.1 As discussed in **Section 3.2**, the proposed floor-to-floor height (**4.5m at G/F and 3.5m at 1/F**) for the 2-storey ‘House’ development fully complies with the PNAP APP-5 for habitable living environment. In addition, it is demonstrated in **Section 3.2** that it is not uncommon for floor-to-floor-height of 4.5m on G/F and floor-to-floor of at least 3.5m for upper floors with reference to similar ‘House’ developments in a similar context. The proposed redevelopment of an existing House provide opportunity for a higher headroom than the bare minimum stated in PNAP APP-5, to improve the health outcome by allowing a well-ventilated indoor living environment, which is increasingly an important consideration after the COVID-19 pandemic.

- 5.2.2 In addition, as discussed in **Section 3.4**, the proposed 3.3m floor-to-floor height for the basement carpark is considered reasonable to fulfil operational requirement for underground carparking and associated ancillary facilities (including cable ducts, E&M and floor slab).

### 5.3 Addressing Site Constraints and Safety Access Requirement by Placing Carpark at Basement Level

- 5.3.1 As discussed in details in **Section 4.1**, the design of the Proposed Scheme needs to overcome a number of site constraints and fulfil modern requirement for safety access. After taking into account of the above, including but not limited to minimizing intervention with the existing slope, retaining existing retaining wall, providing space for

sustaining growth of the 23nos of existing trees, provision of 4 carparking spaces and 1 L/UL bay within the site boundary, and providing an up-to-standard access road with a gradient of 1:10 to bare minimum of 1:6 from Tin Shek Road (which require a 19m-25.5m long ramp on G/F), there will be inadequate space available for House development on the ground floor. As a result of the above, it is considered more efficient to divert the car ramp and parking at basement level (which result in only a minimal site level change from 82.9mPD on Tin Shek Road to 82.35mPD at B/F).

5.3.2 Placing ancillary carparking at basement level not only echo with the Government policy as detailed in **Section 3.3**, it also ensure the resultant BH of the Proposed Scheme to be kept at 8m on ground level, which is comparable to the BH restriction on the “R(C)2” zone (9m) and similar to the height of the existing House on the Application Site (7.5m).

#### 5.4 Fully Compatible with the Surrounding Neighbourhood

5.4.1 The Proposed Scheme, a permitted ‘House’ use with a compatible PR, SC and BH (2 storeys over 1 level of basement carpark), is considered fully compatible with the rural residential neighbourhood in the surroundings, which mostly comprises of 3-storey village type development. Despite the subject application is seeking for a minor relaxation of BH from 9m to 11.3m, only 8m ‘House’ portion will be visible from ground level, which is similar to the BH of the existing House and will not be visually intrusive to the surrounding area. Furthermore, by retaining the 23nos of trees on the western and southwestern boundary and transplanting 2nos of trees to the southern boundary of the Application Site, in addition to enhancing the landscape amenity along Tin Shek Road, these existing trees will also screen off the proposed minor relaxation of BH (+0.5m compared to the existing House) from public viewers along Tin Shek Road.

#### 5.5 Proven Technically Feasible and Resulting in NO Adverse Impacts on Surrounding Environment

5.5.1 A Tree Survey Report (**Appendix B**), Landscape Plan (**Appendix C**), GPRR (**Appendix D**), Justifications for Internal Transport Facilities (**Appendix E**) and Access and Parking Study (**Appendix F**) have been prepared in support of the Proposed Scheme. Findings of these technical reports provides evidence support on the feasibility of the Proposed Scheme.

#### 5.6 Setting a Desirable Precedent for Minor Relaxation of Building Height with Individual Merits

5.6.1 In summary, the Proposed Scheme is in line with the planning intention and complies with the development restrictions of the “R(C)2” zone in terms of nature of use, PR, SC and adherence to the BH profile. The proposed minor relaxation of BH from 9m to 11.3m is intended to accommodate a modern habitable headroom for domestic use, as well as a basement carpark that fulfil operational requirements. The proposed floor-to-floor height (4.5m at G/F and 3.5m at 1/F) is typical in the market for similar House development in similar contexts. Taken into account a number of site constraints and safety access requirement, providing carparking at basement level with a 1:6 ramp from Tin Shek Road

is fully justifiable. The basement extent and floor-to-floor height is considered reasonable to fulfil operational requirement.

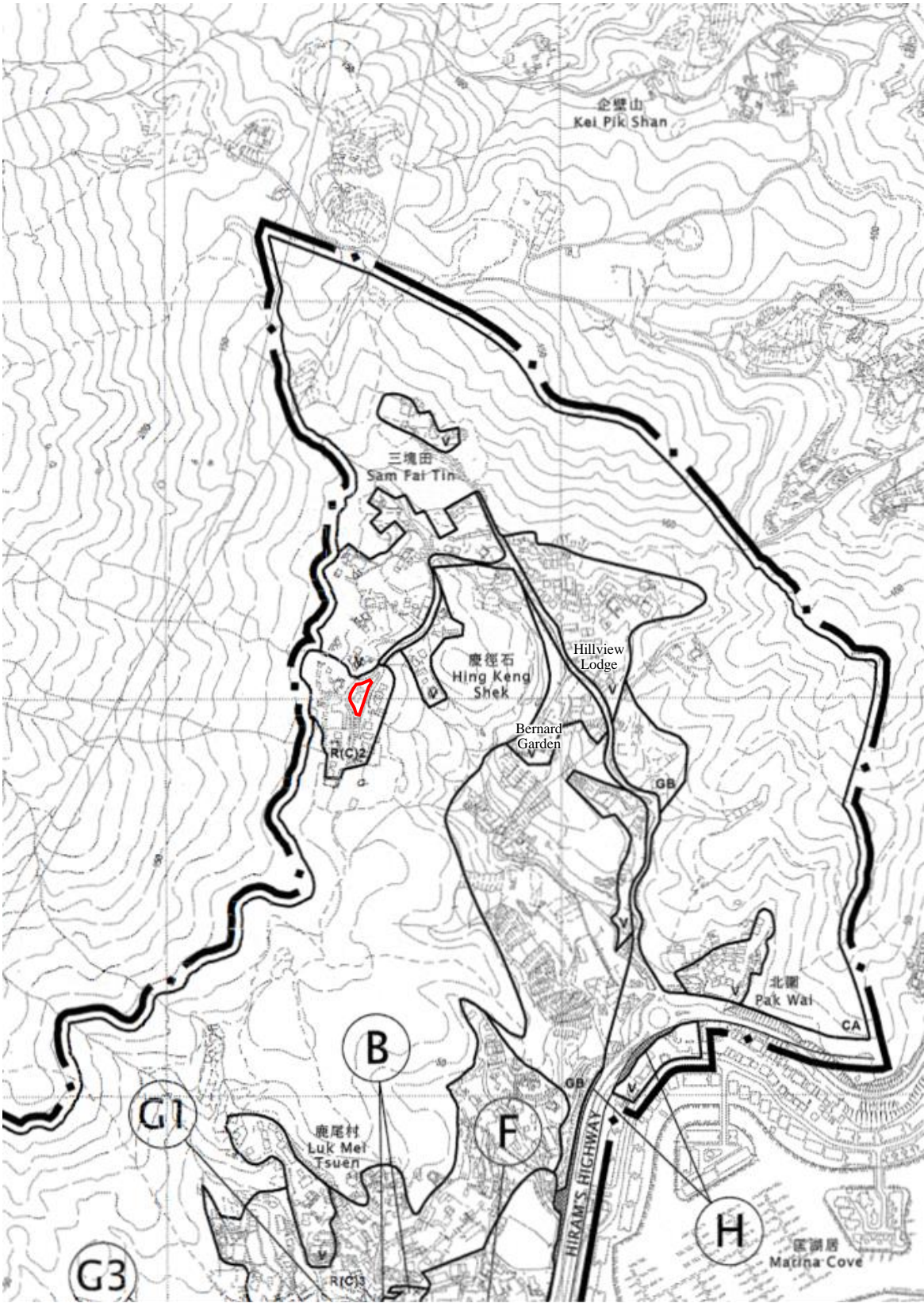
5.6.2 It is worth to note that the resultant BH of the Proposed Scheme is only 2 storeys (8m) visible from ground floor, which is fully compatible with the rural residential neighbourhood where the Application Site locates. The enhanced access arrangement, keeping the existing retaining wall and existing trees could also ensure public safety and provide landscape amenity along Tin Shek Road. Findings of technical reports prepared also confirmed feasibility of the Proposed Scheme.

5.6.3 In view of the above, the Proposed Scheme warrant support from the TPB to approve the minor relaxation of BH restriction at the Application Site which faces a number of physical site constraints and the need to fulfil a number of modern operational requirements, while not compromising compatibility with the surrounding environment.

## 6. CONCLUSION

- 6.1.1 This Supporting Planning Statement is submitted under Section 16 of the TPO to seek approval for Proposed Minor Relaxation of BH Restriction from 9m to 11.3m for a Permitted House development in the “R(C)2” zone at Lot No. 214 in D.D. 219 & the Extension thereto and Adjoining Government Land, Tin Shek Road, Sai Kung, New Territories.
- 6.1.2 The proposed minor relaxation of BH restriction at the Application Site is fully justified for the following reasons. The Proposed Scheme is in-line with the Planning Intention and broad development parameters of the “R(C)2” zone. A Proposed Scheme has been formulated to address a number of site constraints on the Application Site while at the same time fulfil the modern living standard and operational requirements. The Proposed Scheme has maintained the BH visible from ground level at 2 storeys (8m) by placing the ancillary carpark at basement level at his own cost. The scale of the Proposed Scheme is fully compatible with the surrounding context. Maintaining the existing retaining wall and trees will also contribute to public safety and landscape amenity on Tin Shek Road. Technical reports prepared also confirmed the Proposed Scheme is feasible and will not generate adverse impacts to surroundings. The Proposed Scheme therefore presents a desirable precedent for minor relaxation of BH restriction based on individual merits.
- 6.1.3 Taken into consideration the planning merits and justifications put forward in this Supporting Planning Statement, we sincerely seek for the favourable consideration from the TPB to give support to this Section 16 Application.

## Figures



**LEGEND**

 Application Site

**ZONING**

R(C)2 “Residential (Group C)2”  
V “Village Type Development”  
GB “Green Belt”  
CA “Conservation Area”

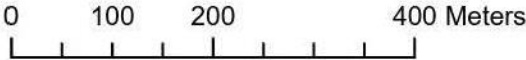
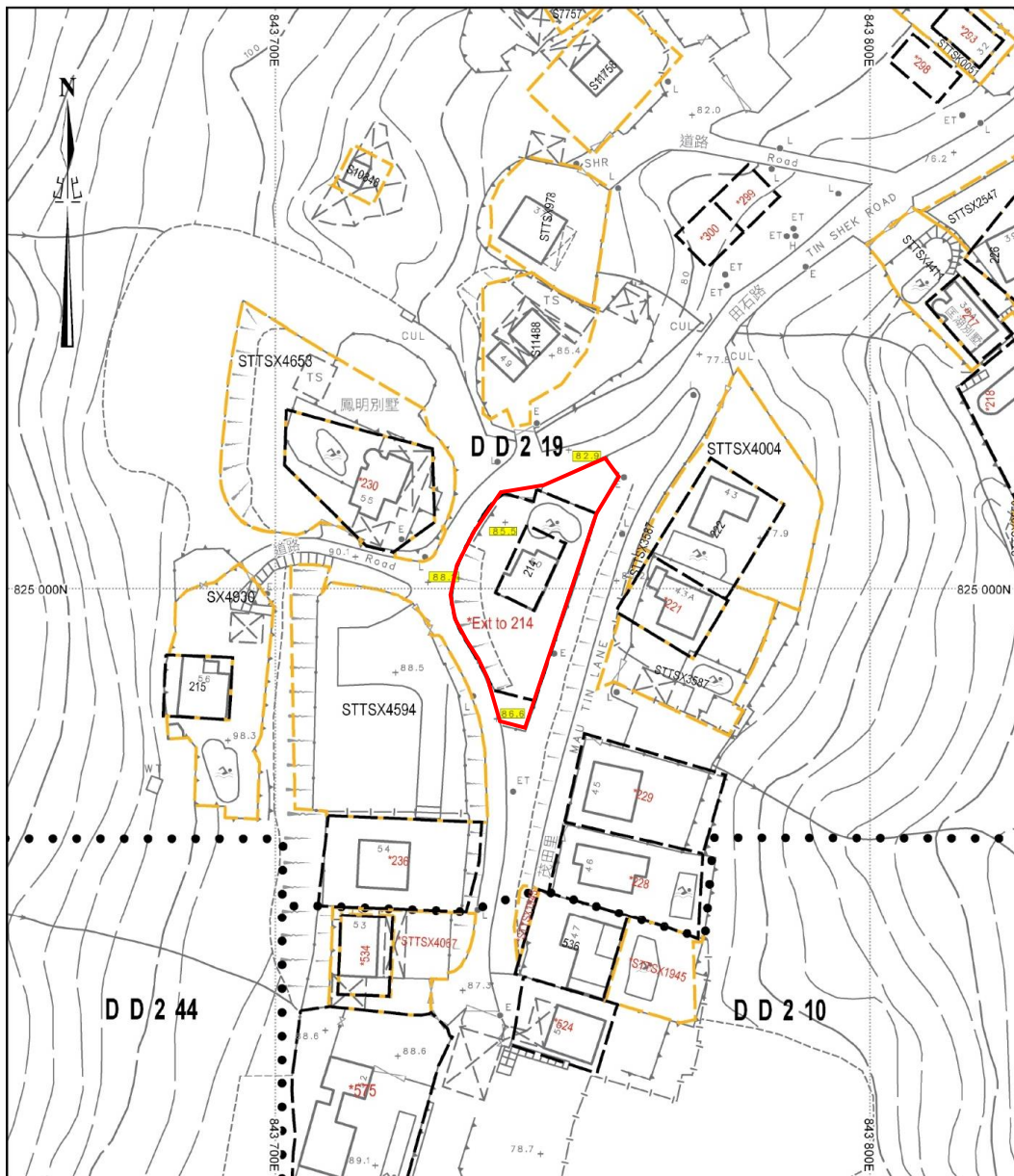


Figure No.	Scale	Figure Title
2.1	1:7,500	Location Plan
ARUP	Date	Source
	April 2025	Extracted from Draft Ho Chung Outline Zoning Plan No. S/SK-HC/12





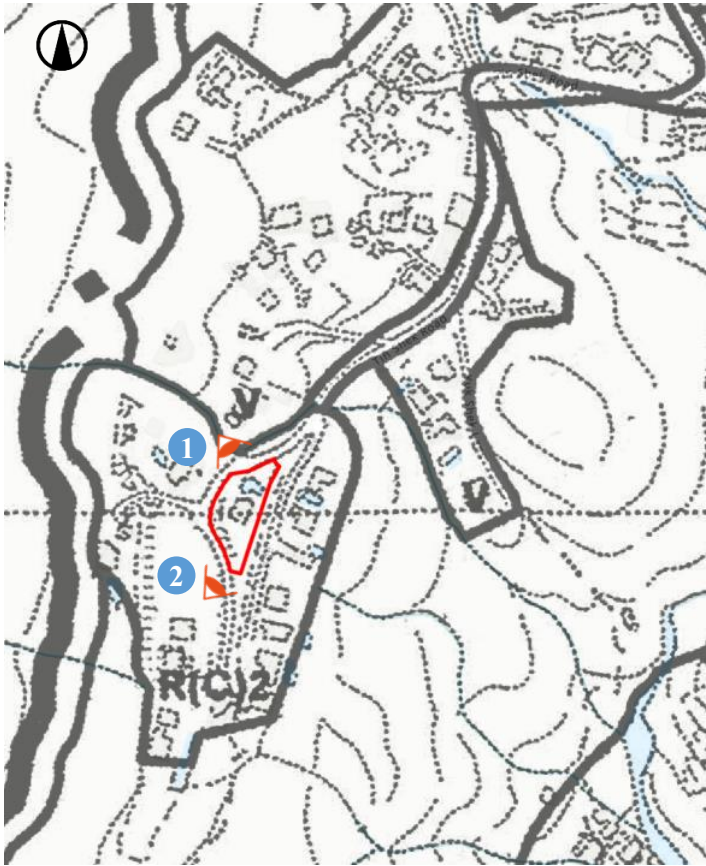
## 地段索引圖 LOT INDEX PLAN



### LEGEND

Application Site

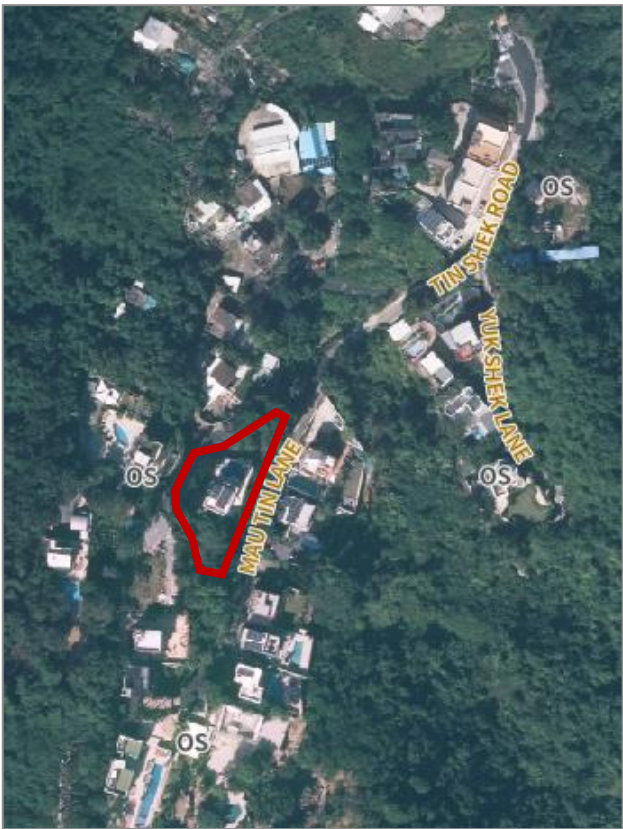
Figure No. 2.2	Scale -	Figure Title Lot Index Plan
<b>ARUP</b>	Date November 2024	Source Adapted from Lot Index Plan No. ags_S00000109834_0001



Key Plan

LEGEND

- Application Site
- Viewing Points



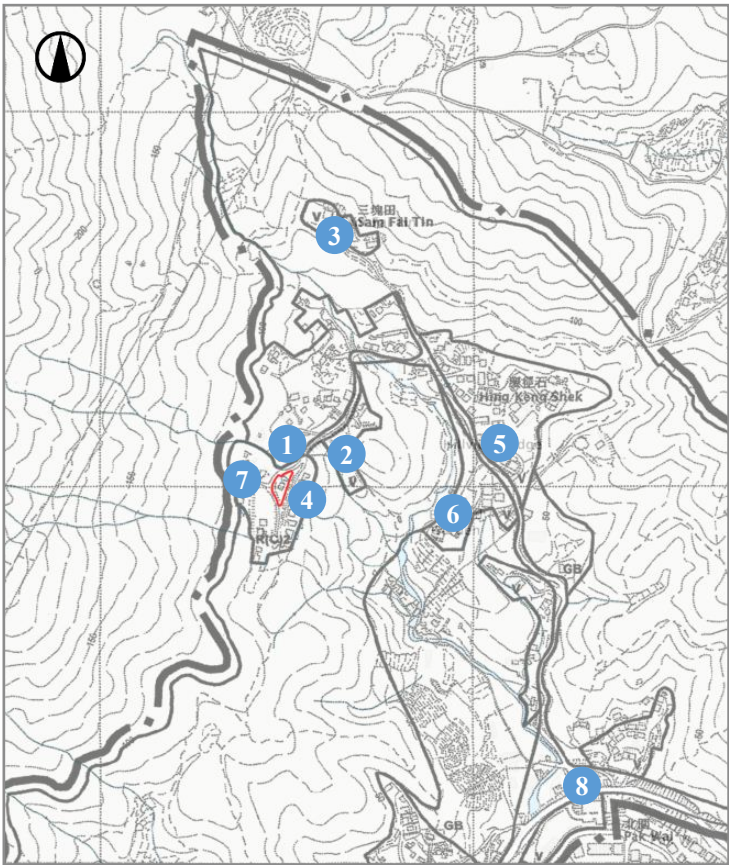
LEGEND

- Application Site



Figure No.	Scale	Figure Title
2.3	-	Existing Condition of the Application Site
ARUP	Date	Source
	November 2024	GeoInfo Map and Site Photos





Key Plan

LEGEND

 Application Site

1 3-storey Houses at Tin Shek Road



2 3-storey Houses at Yuk Shek Lane



3 3-storey Houses at Sam Fai Tin



4 3-storey Houses at Mau Tin Lane



5 Hillview Lodge



6 Bernard Garden



7 3-storey House at a local access along Tin Shek Road



8 Pak Wai Roundabout, Hiram's Highway



Figure No.	Scale	Figure Title
2.4	-	Surrounding Context of the Application Site
ARUP	Date	Source
	November 2024	Site Photos



**RESIDENTIAL (GROUP C)**

Column 1 Uses always permitted	Column 2 Uses that may be permitted with or without conditions on application to the Town Planning Board
Flat Government Use (Police Reporting Centre, Post Office only) House Utility Installation for Private Project	Ambulance Depot Eating Place Educational Institution Government Refuse Collection Point Government Use (not elsewhere specified) Institutional Use (not elsewhere specified) Library Place of Recreation, Sports or Culture Private Club Public Clinic Public Convenience Public Transport Terminus or Station Public Utility Installation Public Vehicle Park (excluding container vehicle) Recyclable Collection Centre Religious Institution Residential Institution Rural Committee/Village Office School Shop and Services Social Welfare Facility Training Centre

**Planning Intention**

This zone is intended primarily for low-rise, low-density residential developments where commercial uses serving the residential neighbourhood may be permitted on application to the Town Planning Board.

(Please see next page)

Figure No.	Scale	Figure Title
3.1a	-	<b>Draft Ho Chung Outline Zoning Plan (No. S/SK-HC/12) – Schedule of Uses of “Residential (Group C)” Zone (1 of 2)</b>
<b>ARUP</b>	Date April 2025	Source Extracted from the <b>Draft Ho Chung Outline Zoning Plan No. S/SK-HC/12</b>



**RESIDENTIAL (GROUP C) (Cont'd)**

**Remarks**

- (a) On land designated “Residential (Group C) 1”, no new development, or addition, alteration and/or modification to or redevelopment of an existing building shall result in a total development and/or redevelopment in excess of a maximum plot ratio of 0.75, a maximum site coverage of 37.5% and a maximum building height of 9m with 2 storeys over one storey of carport or of a maximum plot ratio of 0.75, a maximum site coverage of 25% and a maximum building height of 12m with 3 storeys over one storey of carport, or the plot ratio, site coverage and height of the building which was in existence on the date of the first publication in the Gazette of the notice of the interim development permission area plan, whichever is the greater.
- (b) On land designated “Residential (Group C) 2”, no new development, or addition, alteration and/or modification to or redevelopment of an existing building shall result in a total development and/or redevelopment in excess of a maximum plot ratio of 0.4, a maximum site coverage of 20% and a maximum building height of 9m with 2 storeys over one storey of carport, or the plot ratio, site coverage and height of the building which was in existence on the date of the first publication in the Gazette of the notice of the interim development permission area plan, whichever is the greater.
- (c) On land designated “Residential (Group C) 3”, no new development, or addition, alteration and/or modification to or redevelopment of an existing building shall result in a total development and/or redevelopment in excess of a maximum gross floor area (GFA) of 2,393m<sup>2</sup> and a maximum building height of 12m with 3 storeys over one storey of carport, or the GFA and height of the building, which was in existence on the date of the first publication in the Gazette of the notice of the interim development permission area plan, whichever is the greater.
- (d) On land designated “Residential (Group C) 4”, no new development, or addition, alteration and/or modification to or redevelopment of an existing building shall result in a total development and/or redevelopment in excess of a maximum plot ratio of 0.75 and a maximum building height of 12m with 3 storeys over one storey of carport, or the plot ratio and height of the building, which was in existence on the date of the first publication in the Gazette of the notice of the interim development permission area plan, whichever is the greater. A non-building area (NBA) is designated and shall not be accountable for plot ratio calculation.
- (e) Based on the individual merits of a development or redevelopment proposal, minor relaxation of the plot ratio/GFA/site coverage/building height restrictions stated in paragraphs (a) to (d) above may be considered by the Town Planning Board on application under section 16 of the Town Planning Ordinance.

(Please see next page)

Figure No.	Scale	Figure Title
3.1b	-	<b>Draft Ho Chung Outline Zoning Plan (No. S/SK-HC/12) – Schedule of Uses of “Residential (Group C)” Zone (2 of 2)</b>
<b>ARUP</b>	Date	Source
	April 2025	Extracted from the Draft Ho Chung Outline Zoning Plan No. S/SK-HC/12

the Board by way of a planning application under section 16 of the Ordinance. A Master Layout Plan (MLP) should be submitted together with the relevant assessment reports and a landscape master plan as well as other materials as specified in the Notes of the Plan for the approval of the Board under section 4A(2) of the Ordinance. Development/redevelopment will be in accordance with an approved MLP and it should be ensured that the nature and scale of new development will be in keeping with the surrounding natural landscape and land-uses and will not exert pressure on the limited road and other infrastructural provisions in the Area. A copy of the approved MLP shall be made available for public inspection in the Land Registry pursuant to section 4A(3) of the Ordinance.

## 9.2 Residential (Group C) (“R(C)”) : Total Area 4.40 ha

9.2.1 The planning intention of this zone is primarily for low-rise, low-density residential developments where commercial uses serving the residential neighbourhood may be permitted on application to the Board, and to restrict the future developments within the prescribed development parameters.

9.2.2 This zone can be divided into four sub-areas:

- (a) “R(C)1” – The residential development in this sub-area is subject to a maximum PR of 0.75, either with a maximum SC of 37.5% and a height not exceeding 9m with 2 storeys over one storey of carport, or with a maximum SC of 25% and a height not exceeding 12m with 3 storeys over one storey of carport.

This sub-area covers only one site which is located in the area sandwiched between Hiram’s Highway and Nam Pin Wai Village and it falls within the Ho Chung Site of Archaeological Interest (SAI).

- (b) “R(C)2” – The residential development in this sub-area is subject to a maximum PR of 0.4, a maximum SC of 20% and a height not exceeding 9m with 2 storeys over one storey of carport.

This sub-area covers the area to the south-west of Hing Keng Shek which has mostly been developed into low-density residential houses. The site is only accessible via the sub-standard Hing Keng Shek Road.

- (c) “R(C)3” – The residential development in this sub-area is subject to a maximum gross floor area (GFA) of 2,393m<sup>2</sup> and a height not exceeding 12m with 3 storeys over one storey of carport.

Figure No.	Scale	Figure Title
3.1c	-	<b>Draft Ho Chung Outline Zoning Plan (No. S/SK-HC/12) – Explanatory Statement of “Residential (Group C)” Zone (1 of 2)</b>
<b>ARUP</b>	Date	Source
	April 2025	Extracted from the <b>Draft Ho Chung Outline Zoning Plan No. S/SK-HC/12</b>

This sub-area covers two linked land parcels at Ho Chung North Road which are located close to Hiram's Highway. This sub-area is intended for low-rise and low-density residential development.

- (d) "R(C)4" – The residential development in this sub-area is subject to a maximum PR of 0.75 and a height not exceeding 12m with 3 storeys over one storey of carport. A non-building area (NBA) is designated for an access road purpose where no development is permitted except road, footpath and other related facilities. This NBA shall not be accountable for PR calculation. A clause has been incorporated in the Notes of the "R(C)" zone to allow minor relaxation of the stated NBA restriction under exceptional circumstances based on individual merits.

This sub-area covers a site at Wo Mei Hung Min Road where part of the area under this zoning falls within the Ho Chung SAI.

- 9.2.3 The GFA control under the "R(C)3" zone and the PR control under "R(C)4" zone are regarded as being stipulated in a "new or amended statutory plan" according to the Joint Practice Note No. 4 "Development Control Parameters Plot Ratio/Gross Floor Area", and shall be subject to the streamlining arrangements stated therein.

- 9.2.4 The above sub-areas mainly reflect the existing character and development intensity. The development restrictions are mainly to conserve the existing character and intensity of the developments so as to blend in well with the surrounding natural environment and rural character as well as not to overload the limited infrastructural facilities, particularly the transport network in the Area.

- 9.2.5 Some scattered areas outside existing private residential lots within this zone may not be suitable for residential development. Their suitability for development or inclusion into adjoining lots for development would be assessed individually at the land administration stage based on their visual and amenity value, accessibility and geotechnical, environmental, infrastructural and traffic impacts.

### 9.3 Residential (Group D) ("R(D)") : Total Area 6.76 ha

- 9.3.1 The planning intention of this zone is primarily for improvement and upgrading of existing temporary structures within the rural areas through redevelopment of existing temporary structures into permanent buildings. It is also intended for low-rise, low-density residential developments subject to planning permission from the Board. This is in line with the Government policy of designating 'residential upgrading areas' in the urban fringe in the late 1980's to

Figure No.	Scale	Figure Title
3.1d	-	<b>Draft Ho Chung Outline Zoning Plan (No. S/SK-HC/12) – Explanatory Statement of "Residential (Group C)" Zone (2 of 2)</b>
<b>ARUP</b>	Date <b>April 2025</b>	Source Extracted from the <b>Draft Ho Chung Outline Zoning Plan No. S/SK-HC/12</b>