



Section 16 Planning Application

**Proposed House Development at Tuen Mun Town Lot No. 550 (TMTL 550),
Tuen Mun, N.T.**

Planning Statement

Applicant	: King Brave Limited
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Executive Summary

This planning statement is submitted to the Town Planning Board (the “Board”) in support of a planning application for Proposed House Development (“the proposed development”) at Tuen Mun Town Lot No. 550, Tuen Mun, N.T. (“the Application Site”).

The Application Site, covering an area of about 1,852 sq.m., falls within an area zoned “Recreation” (“REC”) on the Approved Tuen Mun Outline Zoning Plan (OZP) No. S/TM/41 gazetted on 13.6.2025. According to the Notes of the OZP, “House” is a Column 2 use and requires planning permission from the Board.

The Application Site is currently vacant. It was formerly used for agricultural purpose but ceased over 30 years ago. The Application Site, or part of it, is the subject of 2 previous planning applications (Nos. A/TM/399 and 469) and 2 previous rezoning applications (Nos. Y/TM/11 and 31). The last rezoning application (No. Y/TM/31), which was to request rezoning the Application Site from “REC” to “Residential (Group C)” for proposed residential development, was rejected by the Board on 16.2.2024. As remarked by the Chairman of the Rural and New Town Planning Committee, the Applicant might consider submitting a S.16 planning application to pursue a residential development at the Application Site.

As such, the Applicant proposes to erect a single 2-storey house with a maximum plot ratio of 0.2, which aligns with the development restriction for residential development under the existing “REC” zone. With a site area of about 1,852 sq.m., a total GFA of about 370.4 sq.m. is proposed. The site coverage of the proposed development will be about 11.8% whilst the proposed building height of the proposed 2-storey house will not be more than 7m.

A proposed access road from San Shek Wan Road will be connected to the proposed ingress/egress point at the northern boundary of the Application Site. The proposed development will provide 2 private car parking spaces (2.5m x 5m) for residents, 1 disabled car parking space (3.5m x 5m) and 1 loading/unloading space (3.5m x 7m) for light goods vehicle. It is anticipated that the proposed residential development will be completed by 2031.

The justifications of this application are:

1. The previous proposed holiday camp development at the Application Site is no longer viable;
2. The proposed development is in line with Government policy to increase housing supply in Hong Kong;
3. The proposed development is a compatible and suitable development scheme;
4. The proposed development is at acceptable development intensity with sensitive design;
5. The proposed development is responding to changing planning circumstances;
6. The proposed development will encourage better utilization of land resources;
7. The proposed development will not create any interface problem;
8. The proposed development will not generate adverse landscape, environmental, traffic, drainage and sewage impacts to the surrounding areas; and
9. The proposed development will not create any undesirable precedent.

In view of the justifications and planning merits as presented in this planning statement, we sincerely request the Board to give favourable consideration to this application.

行政摘要

此規劃報告書向城市規劃委員會(“城規會”)呈交，旨在支持在新界屯門屯門市地段第 550 號(“申請地點”)，作擬議屋宇發展用途(“擬議發展”)的規劃申請。

申請地點的面積約 1,852 平方米，座落於在 2025 年 6 月 13 日刊憲的屯門分區計劃大綱核准圖(圖則編號：S/TM/41)上的「康樂」地帶。根據該大綱圖的註釋，「屋宇」屬「康樂」地帶內的第二欄用途，須先向城規會提出申請。

申請地點現時是一塊空置土地，之前曾用作農業用途，但已於 30 多年前停止耕作。申請地點，或其部分涉及兩宗規劃申請(申請編號：A/TM/399 及 469)以及兩宗改劃土地用途申請(申請編號：Y/TM/11 及 31)。最後一次改劃申請(申請編號：Y/TM/31)，擬議將申請地點由「康樂」改劃為「住宅(丙類)」地帶，以作住宅發展。該申請於 2024 年 2 月 16 日被城規會拒絕。按鄉郊及新市鎮規劃小組委員會主席所提及，申請人可考慮按城規條例第 16 條申請規劃許可，以作住宅發展。

因此，申請人按照「康樂」地帶內可發展住宅的規限，擬議於申請地點興建一幢兩層高，地積比率為 0.2 倍的屋宇。申請地點的面積約 1,852 平方米，將可建約 370.4 平方米的總樓面面積。擬議發展上蓋面積為 11.8%，而建築物高度不會超過 7 米。

擬議發展將興建一條擬議車路，由散石灣路連接至擬議發展北面的出入口。擬議發展將提供 2 個供住客使用的私家車停車位(2.5 米 X 5 米)，1 個傷殘人士停車位(3.5 米 X 5 米)，以及 1 個輕型貨車上落貨位(3.5 米 X 7 米)。擬議發展預計於 2031 年落成。

本規劃申請的理據為：

1. 申請地點早前的度假營發展不再可行；
2. 擬議發展切合政府增加房屋土地供應的政策；
3. 擬議發展與毗鄰土地用途相容，適合位於申請地點；
4. 擬議發展為可接受的發展密度及顧及現有環境的設計；
5. 擬議發展能回應現時規劃情況的轉變；
6. 擬議發展可有效利用寶貴的土地資源；
7. 擬議發展不會與類近地區產生不協調問題；
8. 擬議發展不會對附近地方構成不良的園景、環境、交通、排水及排污影響；及
9. 擬議發展不會被定為不良的先例。

基於本規劃報告書所述的理據，敬希 各城規會委員及有關政府部門從優考慮這宗規劃申請。

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1. INTRODUCTION

A. Purpose

- 1.1 Pursuant to Section 16 of the Town Planning Ordinance, this Planning Statement Report is submitted to the Town Planning Board (“the Board”) in support of a planning application for Proposed House Development (the “proposed development”) at Tuen Mun Town Lot (TMTL) No. 550, Tuen Mun, N.T. (hereafter referred to as “the Application Site”). **Figure 1** shows the location of the Application Site and the Lot Index Plan indicating the concerned lot is shown per **Figure 2**.
- 1.2 The Application Site, covering an area of about 1,852 sq.m., falls within an area zoned “Recreation” (“REC”) on the Approved Tuen Mun Outline Zoning Plan (OZP) No. S/TM/41 gazetted on 13.6.2025. According to the Notes of the OZP, ‘House’ is a ‘Column 2’ use of the “REC” zone, which requires planning permission from the Board.
- 1.3 The Applicant is the registered land owner of the Application Site. The Application Site had been formerly used for agricultural purposes but ceased over 20 years ago, and has since been vacant. In light of the deteriorating environmental quality due to prolonged land abandonment, the Applicant intends to propose a private single-house development at the Application Site to address the derelict state of the Application Site.

B. Background of the Application

- 1.4 In 1994, the Draft Tuen Mun OZP No. S/TM/8 was exhibited to rezone the land surrounding the Application Site from various statutory zonings to “Other Specified Uses” annotated “Public Recreation and Sports Centre” (“OU(PRSC)”). In determining the rezoning in Tuen Mun Area 45, various considerations had been taken in to account, including land ownership issue, in which the surrounding areas were subsequently resumed by the Government. As the Application Site and its adjacent private lot (i.e. Lot 34 in D.D. 300) were under private ownership, they were zoned “Green Belt” (“GB”) and “OU(PRSC)” on the Tuen Mun OZP No. S/TM/8.
- 1.5 In 2013, a Section 12A rezoning application for the Application Site was submitted by Wing Tung Yick Investment Company Limited, the parent company of the Applicant, to request for amendment to Draft Tuen Mun OZP No. S/TM/30 from “GB” and “OU(PRSC)” zones to “REC” zone to facilitate a proposed holiday camp development subject to a maximum plot ratio (PR) of 0.4, a maximum Gross Floor Area (GFA) of about 722.59 sq.m. and not more than 14 guest rooms (Application No. Y/TM/11).
- 1.6 The rezoning application (Application No. Y/TM/11) was partially agreed by the Board on 5.4.2013 with ‘Holiday Camp’ as a Column 2 use and the Application Site being rezoned to “REC” as reflected on the Draft Tuen Mun OZP No. S/TM/32 exhibited on 2.5.2014. On 22.5.2015, a S.16 planning application (Application No. A/TM/469) for the proposed holiday camp use was approved with conditions by the Board on 22.5.2015. Following the subsequent land exchange application, the land grant of the proposed holiday camp was executed on 1.2.2021.
- 1.7 In view of the transformative impact of the COVID-19 pandemic on the delivery and market demand of recreational facilities and hospitality services in Hong Kong and the free flow of travelers between China and Hong Kong in wake of the epidemic, Hong Kong people have changed their consumption and leisure habits, resulting in the failure to take forward the original holiday camp proposal by the Applicant. Additionally, in consideration of the changing planning circumstances of optimizing use of private land to increase housing land supply in Hong Kong, the Applicant has therefore submitted a second rezoning application in 2023 to request for amendment to Draft Tuen Mun OZP No. S/TM/38 from “REC” zone to “Residential (Group C)” (“R(C)”) zone to facilitate a private residential development of three 2-storey houses, subject to a maximum PR of 0.4, a maximum GFA of 739.275 sq.m. (Application No. Y/TM/31).

- 1.8 While the Planning Department (PlanD) has no in-principle objection to the submitted rezoning application (Application No. Y/TM/31) with no adverse comments from Government departments and all technical issues been resolved, the Rural and New Town Planning Committee (“RNTPC”) of the Board has not agreed to the rezoning application on 16.2.2024, based on the rationale that “the Application Site zoned “REC” is encircled by a larger area zoned “OU(PRSC)” intended primarily for the provision of sports and recreation facilities, it is considered appropriate to retain the “REC” zoning of the Site alongside “OU(PRSC)” for recreational developments for the use of the general public. There are no strong justifications for the proposed rezoning for residential development at the Site.”
- 1.9 Meanwhile, the Chairman of the RNTPC has also remarked that “Flat” and “House” are Column 2 uses under the existing “REC” zone and the Applicant might consider submitting a S.16 planning application to pursue a residential development at the Application Site.
- 1.10 As such, the Applicant submits this planning application for a proposed house development at the Application Site, subject to a maximum PR of 0.2 and a maximum building height of 2-storeys, which are in line with the development restriction for residential development within the subject “REC” zone. In support of the present planning application, a development proposal with Master Layout Plan, Landscape Master Plan, Tree Survey and Tree Preservation Proposal, Environmental Assessment (including Air Quality Impact Assessment, Noise Impact Assessment, Water Quality Assessment, Waste Management and Land Contamination Review), Traffic Impact Assessment, Geotechnical Planning Review Report and Drainage Impact Assessment are included for consideration by relevant Government departments and members of the Board.

C. Organization of the Planning Statement

- 1.11 Following this introductory chapter, this planning statement contains five further chapters:
- Chapter 2 presents the background details of the Application Site in terms of current land-use characteristics and neighbouring developments;
 - Chapter 3 discusses the planning context of the Application Site;
 - Chapter 4 outlines the development proposal;
 - Chapter 5 elaborates on the technical assessments undertaken for the proposed development;
 - Chapter 6 gives account to the justifications of the proposed development; and
 - Chapter 7 is the conclusion of the planning statement.

2. SITE CONTEXT

The Application Site and Its Existing Condition

- 2.1 The Application Site is located near Lung Fu Road and San Shek Wan Road at Area 45, Tuen Mun, New Territories (see **Figure 1**). Topographically, an unnamed knoll is located at the immediate east of the Application Site with a piece of flat land covered by a series of overgrown unsightly vegetation situating at the immediate north of the Application Site. The Application Site was formerly used for agricultural purpose of growing bananas and jackfruit, but all farming activities had been ceased over 30 years ago. The Application Site has since remained vacant.
- 2.2 The Application Site is currently a piece of vacant land with overgrown wild vegetation. Photos showing the existing condition of the Application Site are included at **Photo Plate 1**.

Surrounding Land Uses

- 2.3 The Application Site is situated within a locality of intermixed residential and recreational uses (see **Figure 3**). Several public recreational facilities can be found nearby, including Tuen Mun Golf Centre to the north, Tuen Mun Public Riding School and an Archery Range to the south. A Grade

- 1 historic building, Hung Lau and the southwestern portion of Shek Kok Tsui Site of Archaeological Interest are located at the “GB” zone to the south of the Application Site. Further to the south of the “GB” zone is Butterfly Beach.
- 2.4 To the west of the Application Site across Lung Fu Road is a village development known as Tsing Shan Tsuen Shan Shek Wan South along with several village settlements, which is accessible via San Shek Wan Road. Photos taken at the surrounding of the site are included in **Photo Plate 2**.
- 2.5 To the east and south of the Application Site across Lung Mun Road finds clusters of high-rise residential developments including Melody Garden, Butterfly Estate, Wu King Estate, Siu Shan Court and Sun Tuen Mun Centre with supplementary open space and recreational facilities, as well as the proposed future Tuen Mun South MTR station next to Wu King Estate.
- 2.6 As observed on the Approved Tuen Mun OZP No. S/TM/41 (see **Figure 1**), the whole piece of land bounded by Lung Fu Road and Lung Mun Road is zoned “OU(PRSC)”, except for Hung Lau, which are zoned “GB”, and two private lots – the Application Site and its adjacent private lot (i.e. Lot 34 in D.D.300), which are zoned “REC”. The other areas bounded by Lung Fu Road and Lung Mun Road zoned “GB” and “REC” are either developed site with park (Hung Lau), or non-distinctive from the adjacent environment that is zoned “OU(PRSC)”.

Accessibility

- 2.7 The Application Site is situated at close proximity of the district road network, namely San Shek Wan Road and Lung Mun Road. In addition, there are two Light Rail Transit (LRT) stations (i.e. Butterfly and LRT Depot) within 500m radius distance from the Application Site. Currently, the Application Site is accessible by a trail via San Shek Wan Road (see **Figure 3**).

Land Status

- 2.8 The Applicant is the registered owner of the Application Site. Upon receipt of planning approval (No. A/TM/469) for a holiday camp development, the Applicant had applied for a land exchange application from the Lands Department (LandsD). The Application Site, with the previous lot known as Lot No. 33 RP in D.D.300, were surrendered in exchange for the current subject lot (i.e. TMTL 550).
- 2.9 According to the records of Land Registry, the subject lot is held under New Grant No. 22878 for a lease term of 50 years from 1.2.2021. The ownership particulars of the subject lot are as below:-

Lot No.	TMTL 550
Registered Owner	King Brave Limited
User	A holiday camp of not more than 14 guest rooms together with such other ancillary facilities

- 2.10 Should this application be approved by the Board, the Applicant will pursue another land exchange application to the LandsD for the proposed house development.

3. PLANNING CONTEXT

Outline Zoning Plan

- 3.1 The Application Site falls within an area zoned “REC” on the Approved Tuen Mun OZP No. S/TM/41 gazetted on 13.6.2025 (see **Figure 1**). The planning intention of “REC” zone is “primarily for recreational developments for the use of the general public. It encourages the development of

active and/or passive recreation and tourism/eco-tourism. Uses in support of the recreational developments may be permitted subject to planning permission.”

- 3.2 According to the Notes of the “REC” zone, “House” is a Column 2 use and requires planning permission from the Board. Meanwhile, under the Remarks in the Notes of the “REC” zone, the development restriction for residential development is subject to a maximum plot ratio of 0.2 and a maximum building height of 2 storeys.
- 3.3 With reference to the Explanatory Statement of the OZP, to ensure adequate greenery provision to the site and no significant disturbance to the existing landscape resources and character, tree felling should be minimized and a minimum greenery coverage of 30% is required.

Previous Applications

- 3.4 The Application Site is subject to 2 previous planning applications and 2 rezoning applications as below:

Previous Section 16 Planning Applications

Application No.	Applied Use	Location	Decision	Date of Decision
A/TM/399	Proposed Houses	Lot 33 RP in D.D. 300	Rejected	10.9.2010
A/TM/469	Proposed Place of Recreation, Sports or Culture (Holiday Camp)		Approved with Conditions	22.5.2015

Previous Section 12A Rezoning Applications

Application No.	Proposed Amendments	Location	Decision	Date of Decision
Y/TM/11	Rezoning from “Green Belt”, “Other Specified Uses” annotated “Public Recreation and Sports Centre” to “Recreation”	Lot 33 RP in D.D. 300 and Adjoining Government Land	Partially Approved	5.4.2013
Y/TM/31	Rezoning from “Recreation” to “Residential (Group C)”	TMTL 550	Rejected	16.2.2024

4. DEVELOPMENT PROPOSAL

Development Scheme

- 4.1 The Applicant intends to develop a private residential development of a single 2-storey house. With a total site area of about 1,852 sq.m. and a plot ratio of not exceeding 0.2, the total GFA proposed in this development scheme will be about 370.4 sq.m. The site coverage of the proposed development will be about 11.8% whilst the proposed building height of the proposed 2-storey house will not be more than 7m (see the master layout plan, floor plan, elevations and sections at **Figures 4-7**).
- 4.2 A private garden area will be provided behind the proposed house whilst a guard room, as well as the underground septic tank and soak away pit, are provided near the entrance. The Application Site will be fenced off by a 2.3m high boundary wall. Tentatively, it is anticipated that the proposed house development will be completed by 2031. The key development parameters of the proposed development are summarized at **Table 4.1**:-

Table 4.1: Key Development Parameters

1. Site Area	:	About 1,852 sq.m.
2. Total PR	:	Not exceeding 0.2
3. Total GFA	:	370.4 sq.m.**
- Domestic GFA		189.135 sq.m. (G/F)
- Non-domestic GFA		180.316 sq.m. (1/F)
		0.949 (Guardroom)
4. Site Coverage	:	About 11.8%
5. No. of Blocks	:	2 (House and Guardroom)
6. No. of Storeys	:	2 (House)
		1 (Guardroom)
7. Building Height	:	
- House		Not more than 7m (about 36.6mPD)
- Guard Room		Not more than 2.3m (about 32.4mPD)
8. Car Parking Provision	:	3
- Residents and Visitors Private		2 (2.5m x 5m)
Car Parking		1 for Disabled (3.5m x 5m)
9. Loading / Unloading Space	:	
- Light Goods Vehicle		1 (3.5m x 7m)
10. Proposed Greenery	:	Not less than 555.6 sq.m. (30% of the site area)
11. Proposed Open Space	:	Not less than 3 sq.m.
12. Designed Population	:	3 (Average household size 2.6 adopted)
13. Anticipated Completion Year	:	2031

**GFA for ancillary uses (e.g. fire service tank & pump enclosure, carport, area covered by canopy, stair hood and lift etc.) are disregarded in plot ratio calculation and the exemption for ancillary uses will be applied to the Buildings Department and LandsD)

- 4.3 The proposed house development will be single family house with a designed population of 3, based on 2.6 persons per flat from the 2021 Population Census of Tuen Mun New Town.

Access to the Site and Traffic Arrangement

- 4.4 There is an existing trail connecting the Application Site and San Shek Wan Road about 80m to the north. The northern portion of existing trail was originally paved for vehicular access to the vacant Government land from San Shek Wan Road which the area was originally occupied by container storage yard a long time ago and site for the storage of construction materials during the construction of Lung Fu Road. It is proposed to widen and enhance the existing access road to a 4.5m wide with 1.6m footpath on the eastern side of the vehicular access road forming the main access to the site. The widening of the associated vehicular access to 6.1m is to meet the emergency vehicular access (EVA) requirement as specified by the Buildings Authority. To provide the proposed access road, the existing passing bay at San Shek Wan Road is proposed to be shifted about 20m to the west. The current condition of the existing trail is shown in **Photo Plate 2**. The indicative alignment of the proposed vehicular access road is illustrated in **Figure 4**.
- 4.5 The proposed vehicular access road, falling within Government land zoned "OU(PRSC)", is the shortest selected route between the Application Site and the existing road system. Its design and alignment largely follows the existing track to minimize the impact on adjacent landscape resource. Upon approval of this application by the Board, the Applicant will be responsible for the construction, management and maintenance of the proposed access road. Details of the proposed access road will be investigated at the land exchange application stage.
- 4.6 A horsing trail is running across the western portion of the Application Site from the Tuen Mun Public Riding School with a loop going up the knoll. As seen on **Figure 4**, the existing trail/proposed access road is intersected with the horsing trail right outside the ingress/egress point of the proposed development (see **Photo Plate 1**). In order to improve traffic safety and to minimize the

impact on horse riders and horses, electronic gates will be installed on both sides of the intersecting points so that the drivers must stop and check the traffic condition before entering the horsing trail. Besides, warning signs will also be erected for drivers and horse riders to alert them to pay attention at the road intersection point. Safety measures will also be adopted during the road widening / improvement works of the proposed access road. The Applicant is also committed to arrange ongoing communication and meetings with relevant parties/departments to address their concerns and implement respective measures to handle any further potential issues.

- 4.7 The car parking spaces provided for the proposed development will comply with the requirement under the HKPSG. The proposed house will provide two proposed parking spaces for private vehicles (2.5m x 5m) for residents / visitors located at the carport at the G/F of the proposed house. One disabled parking space (3.5m x 5m) and 1 loading/unloading space (3.5m x 7m) for light goods vehicle (LGV) will be provided to the north of the proposed house. A security guard will be present at the guard room to manage the traffic flow.

5. TECHNICAL ASSESSMENTS

Tree Survey, Landscape and Tree Preservation Proposal

- 5.1 A Landscape Proposal and Tree Survey Report (see **Appendix 1**) is prepared by ADI Limited to assess the potential landscape impact on the Application Site and to provide landscape design of the proposed residential development.

Tree Survey

- 5.2 The Application Site has been vacant for years with no tree exactly located within the site. However, 4 existing trees, a weedy tree *Leucaena leucocephala* and three *Artocarpus heterophyllus*, are located on / very close to the site boundary and seriously leaning into the site, which would be affected by the site formation works for the proposed development. Besides, the proposed access road from San Shek Wan Road to the Application Site would affect another 19 trees outside the Application Site. All of the affected trees are not registered old and valuable trees and with generally fair to poor health conditions. Having considered the species and condition of these affected trees, they are not suitable candidates for tree transplanting, therefore, felling of the above 23 trees is recommended.
- 5.3 The new tree planting proposal intends to create a good quality of green environment for future residents with proper and good quality planting establishment. A total of 16 new trees of heavy standard stocks would be planted with 1:1 replanting ratio (16 trees felled: 16 new trees planted), with exclusion of the removal of 7 nos. of weedy trees, *Leucaena leucocephala*.

Landscape Design Proposal

- 5.4 The landscape design concept for the proposed residential development provides a synthesis between the contemporary design philosophy and sustainable design principle responding to both site context and the proposed nature of the development, and respects the surrounding landscape features. The proposed scheme aims to provide a high-quality living environment for the future residents. The landscape area will be designed with contemporary design language and sustainable principles which will provide private relaxing and recreational space for the residents. A leisure lawn with benches and embraced with trees is set at the front court creating share and comfortable environment for relaxing as well as an intimate garden courtyard for the residents. Upon full establishment of greening measures in the landscape design proposal, the proposed greenery coverage within the development will not be less than 555.6 sq.m. (about 30% of the total site area of 1,852 sq.m.), which complies with the 30% OZP greenery requirement under the subject "REC" zone.

Open Space Provisions

- 5.5 Adequate open space will be provided in accordance with the requirement of HKPSG for the provision of local open space with the objective of providing high quality passive recreational space that will satisfy the needs of the residents. A leisure lawn of about 3 sq.m. will be proposed at the northern portion of the site as communal open space for the enjoyment of the residents. The proposed scheme is designed to meet the requirement providing minimum 1 sq.m. per person of local open space as required by the HKPSG, i.e. not less than 3 sq.m..

Environmental Assessment

- 5.6 Ramboll Hong Kong Limited was appointed by the Applicant to undertake an Environmental Assessment (EA) (see **Appendix 2**) to examine the impacts associated with the proposed development from environmental point of view and to demonstrate that the proposed development is environmentally acceptable.
- 5.7 The key environmental issues and concerns of the EA will be air quality, noise, water quality, waste management and land contamination, and will be reviewed by respective assessments as the followings:

Air Quality Impact Assessment

- 5.8 The air quality impact assessment has been carried out to examine the potential air quality impact that could arise from the construction phase and operation phase of the proposed development.
- 5.9 Construction activities will bring potential temporary air quality impact to the surrounding areas. As the number of diesel or petroleum-fuelled machinery operating in the Application Site is limited, the emission of pollutants from construction will not be significant when compared with that from road traffic. Therefore, dust is potentially the major source of air quality impact in construction.
- 5.10 In mitigating the perceived air quality impact from the construction phase, assorted air pollution control measures will be adopted and implemented by the Applicant in compliance with the requirement from HKPSG, Air Pollution Control (Construction Dust) Regulation and the "Recommended Pollution Control Clauses for Construction Contracts" from the Environmental Protection Department (EPD). Therefore, it is anticipated that no adverse air quality impact will be brought to the surrounding environment under good site management.
- 5.11 In regards of the operation phase, onsite surveys were conducted in June 2025 to verify the presence of chimneys. With no chimney identified within 200m from the site boundary of the Application Site, it is anticipated that the proposed development will not be subject to adverse industrial emission impact.
- 5.12 On the other hand, the buffer distance between the surrounding road network and proposed new access road is about 70m with no air sensitive uses within the buffer zone, which is in compliance with the requirement under HKPSG (i.e. 10m). Therefore, the future occupants of the Proposed Development will not be subject to significant vehicular emission impact.

Noise Impact Assessment

- 5.13 The noise impact assessment was carried out to assess the potential industrial noise and road traffic noise impact on the noise sensitive uses of the proposed development.
- 5.14 Onsite surveys were conducted in June 2025 and no industrial noise sources were identified within 300m from the boundary of the proposed development. Therefore, it is anticipated that the proposed development will not be subject to adverse industrial noise impact.

- 5.15 A railway noise impact assessment has also been conducted that light rail transit as a potential noise source is identified with distance of about 200m to the southeast of the Application Site. However, the direct line of sight between the proposed development and identified Butterfly light rail station is blocked by natural terrain. In view of the separation distance of 25m is met and existing topographic screening, it is anticipated that the proposed development would not be subject to adverse railway noise impact.
- 5.16 A road traffic noise impact assessment has been conducted for the proposed development and existing noise sensitive receivers. The result of the assessment indicates that the predicted noise level will comply with the relevant Noise Control Ordinance standard. Therefore, no adverse road traffic noise impact is anticipated on the proposed development.

Water Quality Assessment

- 5.17 The water quality assessment was carried out to assess the potential impacts arising from the construction and operation phases of the proposed development and their significance on the Water Sensitive Receivers (WSRs).
- 5.18 Site construction activities will inevitably have the potential to generate wastewater. Potential sources of pollution include construction runoff and drainage, sewage effluent from construction site and liquid spillage such as oil, diesel and solvents, etc. During operation, the irrigation runoff and surface runoff during rainfall events, which is known as non-point source of pollution, may cause potential water quality impact.
- 5.19 The Applicant will follow the best management practices listed in the assessment, including Professional Persons Environmental Consultative Committee Practice Note (ProPECC PN) No.2/24 "Construction Site Drainage", ProPECC PN No.1/23 "Drainage Plans Subject to Comment by the EPD" and "Recommended Pollution Control Clauses for Construction Contracts" by EPD. With proper implementation of recommended mitigation measures, good construction site practices as recommended in relevant regulatory guidelines, adverse water quality impacts are not expected at the identified WSRs.
- 5.20 The Applicant will also install an underground septic tank with soakaway pit at the northern portion of the Application Site during the operation phase, which will be the same system adopted in the previous approved application (No. A/TM/469). Therefore, it is anticipated that the proposed development would not pose significant impact on the water quality of identified WSRs.

Waste Management Assessment

- 5.21 The waste management assessment was carried out to identify potential waste management issues in connection with the construction of the proposed development.
- 5.22 The construction activities will generate a variety of wastes including construction and demolition materials from site clearance, site formation works, chemical waste and general refuse.
- 5.23 Recommended Pollution Control Clauses for Construction Contracts published by EPD would be implemented during the construction phase of the proposed development. Therefore, no unacceptable impacts associated with waste management during the construction and operation phases are envisaged.

Land Contamination Review

- 5.24 The land contamination review was carried out to assess the potential land contamination impact due to the previous land uses and /or the existing operations.

- 5.25 According to the finding of the review, the Application Site has been a natural terrain since 1949 and no landuse change related to potential contamination works and activities is observed. Therefore, land contamination issue within the Application Site is not anticipated.
- 5.26 To conclude, the environmental assessment study confirms the acceptability of proposed development from environmental point of view.

Traffic Impact Assessment

- 5.27 CKM Asia Limited was appointed by the Applicant to undertake a Traffic Impact Assessment (TIA) (see **Appendix 3**) to assess the potential traffic impact on the adjacent road network.
- 5.28 To analyze the existing traffic conditions, a manual classified traffic count survey was conducted on 13.5.2025 at the nearby major junctions. The AM and PM peaks hours were identified to be between 0730 - 0830 and 1745 - 1845 respectively. Based on the existing traffic flows, all concerned junction were performing satisfactorily.
- 5.29 The car parking spaces provided for the proposed development will comply with the requirement under the HKPSG. Since the vehicles over 10m in length are prohibited from entering San Shek Wan Road, a LGV loading / unloading bay is provided within the Application Site. A swept path analysis to check the ease of vehicle manoeuvring within the proposed development is conducted and no manoeuvring issue is found.
- 5.30 An access road connecting from San Shek Wan Road to the Application Site will be provided. The proposed access road has a minimum width of 4.5m with one footpath along the eastern side with minimum width of 1.6m. There will be a 12m-long passing bay at midway of the straight section of proposed access road.
- 5.31 The proposed development is expected to generate a two-way traffic of 2 pcu/hour during both the AM and PM peak hours. By analyzing the Year 2034 Traffic Flows, which were derived from applying a nominal growth to the existing traffic flow plus the additional traffic generated by the planned/committed developments in the vicinity, the junction capacity assessment results show similar results, with or without the proposed development, in which the junctions will operate with capacities during the AM and PM peak hours.
- 5.32 A pedestrian impact assessment is also conducted for the footpaths likely used by the residents of the proposed development. The proposed development is expected to generate a two-way traffic of 3 ped/15min during the AM and PM peak periods. By analyzing the Year 2034 Pedestrian Flows, which were derived from applying a nominal growth to the existing pedestrian flow plus the additional pedestrians generated by the planned/committed developments in the vicinity, all surveyed footpaths show similar results, with or without the proposed development, in which all footpaths operate with Level of Service (LOS) A during the AM and PM peak hours. The proposed development has no adverse impact to the footpath assessed.
- 5.33 Based on the assessment result, it can be concluded the proposed development will not induce significant traffic impact on the surrounding road networks. From traffic engineering grounds, the proposed development is deemed acceptable.

Geotechnical Planning Review Report

- 5.34 Fugro (Hong Kong) Limited was appointed by the Applicant to prepare a Geotechnical Planning Review Report (GPRR) (see **Appendix 4**) to study the impact of the proposed development on the stability of the existing slopes and retaining walls in the area.

- 5.35 Two man-made features - an unregistered slope partly within the western site boundary and adjacent Government land, and an existing feature No. 5SE-D/C76 abutting the proposed access road alignment are located in the vicinity of the Application Site. The stability of these features could affect and be affected by the proposed development.
- 5.36 According to the finding of the review, the Application Site meets the alert criteria for carrying out a Natural Terrain Hazard Study (NTHS) and is prone to the natural terrain hazards such as open hillslope failures and topographic depression failures. It is recommended to undertake a NTHS with recommended mitigation measures as part of the proposed development.
- 5.37 The existing features within the Application Site will be upgraded as part of the site formation work to the current safety standard, based on the requirement of the Master Layout Plan.
- 5.38 Based on the findings of the review, it can be concluded that the proposed development is considered geotechnically feasible, with the implementation of the appropriate mitigation measures for natural terrain hazards, and proposed site formation works based on detailed ground investigation and stability assessment to be carried out.

Drainage Impact Assessment

- 5.39 Ho Tin & Associates Consulting Engineers Limited was appointed by the Applicant to prepare a Drainage Impact Assessment (DIA) (see **Appendix 5**) to assess the potential drainage impact of the proposed development.
- 5.40 The Application Site is located at the toe of embankment of Lung Fu Road near the toe of Castle Peak, which would receive surface runoff from adjacent catchment areas in addition to the rain falling directly onto its area. Existing flow paths of the adjacent upstream areas of the Application Site would be maintained in general, in which the proposed development would not cause any blockage to the flows of the adjacent areas.
- 5.41 In order to properly manage the surface runoff after development of the Application Site, 0.75m setback from the Application Site boundary is reserved for 375mm and 450mm peripheral u-channels with catchpit to collect the surface runoff from the adjacent areas, as well as avoid surface runoff running outside onto the surroundings. The flow inside the channels will be discharged via a purposely constructed terminal manhole with desilting trap to the existing streamcourse to the west of the Application Site. It should not have implementation problems on construction works and the operation of the drainage system.
- 5.42 In addition, proposed 300mm u-channels would also be constructed along the western side of the proposed external access to receive surface runoff from the access itself as well as the adjacent area. The collected surface runoff will be conveyed to the existing 375mm u-channel abutting on the edge of San Shek Wan Road. There will also be no change in drainage pattern after completion of the proposed access road.
- 5.43 With the provision of the proposed drainage system, it is anticipated that the proposed development would not cause adverse drainage impacts to the surrounding areas.

Sewerage Arrangement

- 5.44 At present, there is no public sewer in the vicinity of the Application Site. Given that the development is small in scale, it is proposed to use a septic tank for waste disposal generated from the proposed development. The sewage treatment facilities will be placed underground and treated effluent would be percolated to surrounding subsoil in the soakaway pit. The Applicant will follow ProPECC PN No.1/23 to prevent any water pollution.

6. PLANNING JUSTIFICATIONS

Previous Proposed Holiday Camp Development No Longer Viable

- 6.1 In wake of the COVID-19 pandemic and increasing free flow of travelers between Hong Kong and China, the consumption and leisure habits of Hong Kong people have changed significantly, which have considerably affected the delivery and market demand of recreational facilities and hospitality services in Hong Kong. The Applicant has therefore failed to take forward the original holiday camp development, which is considered no longer viable. On the contrary, to avoid further land degradation of the Application Site due to prolonged land abandonment, the proposed house development could allow utilization of unused idle land to transform the degraded rural land and improve the existing environment.

In Line with Government Policy to Increase Housing Supply in Hong Kong

- 6.2 Over the past five years, ensuring a stable housing supply of both public and private housing in the market has remained a major focus of the Hong Kong Government's policy approach. According to Hong Kong 2030+ - Towards a Planning Vision and Strategy Transcending 2030+, about 510 – 680 hectare of housing land shortfall is projected for future development to meet the needs of the growing and aging population profile of Hong Kong. Additionally, the 2024 Long Term Housing Strategy has also identified a shortage of about 52,000 units in meeting the private housing supply target for the coming decade (from 2025-26 to 2034-35).
- 6.3 In facing the housing shortage, the Government has adopted a multi-pronged approach of land searching exercises to convert potential "primitive land" into "spade-ready" sites for residential development such as the development of various New Development Areas / New Town Extension projects, unlocking Tso/Tong lands in the New Territories, rezoning underutilized sites of different zonings and brownfield sites into public housing sites and announcements of Land Sharing Pilot Scheme in 2020 and Northern Metropolis in 2021, etc.
- 6.4 While the Application Site does not fall into the coverage of the aforementioned policy context, the intention of optimizing the use of private idle land for residential development to foster housing supply in the market will support the Government's housing initiatives and aligns with the Government's policy direction.

Compatible and Suitable Development Scheme

- 6.5 The Application Site is situated within a neighbourhood that is intermixed with residential and recreational uses with Tsing Shan Tsuen located to the west of the Application Site, in which a low-rise and low-density house development could be considered as a compatible and suitable scheme. With careful building design and landscape treatment to be incorporated, the proposed house development will blend with its surrounding environment in terms of land use planning and visual quality.
- 6.6 As the proposed development complies with the development restriction for residential development under the existing "REC" zone, i.e. with a plot ratio of not more than 0.2, a maximum building height of not more than 2 storeys and a minimum greenery coverage of 30%, the proposed development is deemed acceptable in terms of development intensity and therefore justifiable. Meanwhile, in view of existing low-density residential settlements/buildings along San Shek Wan Road in the surrounding areas, the proposed house development, which would incorporate contemporary and sustainable designs that is compatible with the surrounding environment, is therefore considered a compatible and suitable scheme.

Acceptable Development Intensity with Sensitive Design

- 6.7 The proposed development will be under a PR of not more than 0.2, a maximum building height of 2-storeys and greenery coverage of more than 30%, which complies with the development restriction for residential development within the subject “REC” zone. The development intensity of the proposed development will actually be lower than the previously approved holiday camp development (No. A/TM/469) with a lower PR and GFA, and is similar to the built forms in the rural areas of the New Territories. As such, the low-density nature of the proposed development will conform to the rural character and the existing recreation facilities in the vicinity with no adverse visual impact.
- 6.8 It should be highlighted that the proposed residential development of the last rezoning application (No. Y/TM/31) have received no adverse comments from Government departments with all technical concerns been resolved, which implies that a residential development is technically feasible at the Application Site. Therefore, this planning application, which proposes for a similar residential development, should be considered under an acceptable development intensity.
- 6.9 Moreover, the proposed development is geared to produce a design that will further enhance the area’s qualities. Adequate planting and open space would be introduced throughout the proposed development with a carefully designed interplay between soft landscape and built form so as to minimize the visual impact and provide a pleasant living environment for residents. Landscape area and planting on the periphery of the Application Site will serve as a buffer and strikes a balance between the development and the surroundings. Therefore, the proposed development will not be incompatible with the surrounding rural environment.

Responding to Changing Planning Circumstances

- 6.10 While the previous residential development proposal at the Application Site was deemed undesirable as noted in the previous rejected application (No. Y/TM/31), the transition in the planning circumstances in the surrounding areas and Hong Kong should be included in the consideration of the current application.
- 6.11 In the recent years, the Government is actively exploring the feasibility of developing underutilized areas in the Tuen Mun areas, such as the recently announced development proposal for Lung Kwu Tan reclamation and the re-planning of Tuen Mun West area in July 2025 and “Study for Developments of Tuen Mun East and Adjacent Green Belt Cluster – Feasibility Study”. Additionally, the proposed Tuen Mun South MTR station, with the estimated operation date of 2030, is situated in the same locality of the Application Site. These indicate the Government’s intention to fully unleash the development potential of Tuen Mun.
- 6.12 Furthermore, in the ongoing territory-wide land searching exercise for potential housing sites, various land use review studies have been conducted by the PlanD to assess the development feasibility of unused sites located in zoning that are deemed unsuitable for residential uses such as “GB”, “REC”, “Government, Institution or Community” (“G/IC”) and “Agriculture” (“AGR”). Other than the 8 former “GB” sites of about 255 ha rezoned for residential developments in the 2022 green belt review study, more sites of different zonings have been identified and rezoned for residential development, for instance, San Hing Tsuen in Lam Tei (“Residential (Group E)”), Choi Ha Road and Choi Hing Road in Kowloon Bay (“G/IC”) and Texaco Road in Tsuen Wan (“G/IC”) etc.
- 6.13 Therefore, in view of the previous planning history of the Application Site and the current planning circumstances, the subject application complies with the planning restriction of the subject “REC” zone and is in line with the RNTPC’s decision of the last application (No. Y/TM/31) to retain the “REC” zone, but is also coherent with current changing planning circumstances to develop idle sites for provision of housing land.

Better Utilization of Land Resources

- 6.14 It should be highlighted that the Application Site has been left idle for over three decades. While the Applicant's previous attempt to develop a holiday camp has been unsuccessful in the past years as mentioned in para. 1.7, the proposed residential development actually presents a golden opportunity to revitalize the existing vacant unsightly ground into a viable proposed single house development with enhanced environmental quality and visual interest in the locality.
- 6.15 Since the proposed development also complies with the existing Government policy to increase housing supply, as well as aligns with the development parameters for residential development under the subject "REC" zone, it can effectively utilize the valuable land resources of the territory by incorporating innovative built-form and proper landscape elements into the entire development. Therefore, from the land use maximization perspective, the proposed development provides a solution to maximize land utilization at the Application Site rather than leaving it idle and deteriorating.

Will not Create any Interface Problem

- 6.16 As highlighted in paragraph 4.6 of this statement, part of the existing horse trail will intersect with the proposed vehicular access of the proposed development. As similar interface concerns have been addressed in the previously approved S.12A (No. Y/TM/11) and S.16 (No. A/TM/469) applications for the proposed holiday camp and respective approval conditions, the Applicant is committed to arrange ongoing communication and meetings with relevant parties/departments to address their concerns and implement respective measures to handle any further potential issues.
- 6.17 Given the nature of the proposed house development, the presumed number of users and traffic generation will be less than the formerly approved holiday camp. Therefore, the potential impacts and interface problem will in fact be comparatively lower. The Applicant will implement the previously approved safety measures to ensure the safety of the horses and road users as below:
- a) installing two electronic gates (see **Figure 4**) on the proposed vehicular access at the intersection of the horse trail so that the drivers will stop and check the traffic condition before proceeding into the intersection;
 - b) placing a security guard at the gate for managing the traffic flow of the proposed access road and horse trail; and
 - c) erecting warning signs for drivers and riders.
- 6.18 In addition, the result of noise impact assessment indicates that the predicted noise level will comply with the relevant Noise Control Ordinance standard. Therefore, no adverse road traffic noise impact is anticipated on the proposed development. The architectural design will incorporate noise and visual mitigation measures such as planting high trees along the sound absorbing wall close to the trail. All human activities are largely restricted indoor. It is believed that there will be no interface problem for the horses, road users and residents.

Will Not Generate Adverse Impacts to the Surrounding Areas

- 6.19 In view of the nature and small scale of the proposed development, with submission of the supporting technical assessments together with this application, no adverse impacts are anticipated on the surrounding areas, as discussed below:-

Landscape

- 6.20 As referred to the Landscape Proposal (**Appendix 1** refers), the landscape impact of the proposed development is insignificant. With landscaping upgrades of new planting areas and retaining of the

surrounding vegetation, the Application Site can enjoy improvement in landscape terms instead of the ongoing vacancy and land deterioration. Meanwhile, the proposed fallen trees are of insignificant ecological values and the Applicant will compensate by planting 16 new trees in the Application Site to create a good quality of green environment for future residents.

- 6.21 With the proposed eco-friendly design, the proposed development will fit into the existing rural surrounding with no adverse landscape impact on the surrounding areas. The proposed landscape design also aims to maximizing the opportunities for the soft landscape and establish pleasant landscape areas to meet the varying needs of the residents. Therefore, it can be concluded that the proposed development will have insignificant landscape impact.

Environment

- 6.22 An EA report (**Appendix 2** refers) is conducted in support of this application. The Applicant will adhere to all the requirements and implement all the recommended measures and practices listed in the EA report to comply with the relevant regulations, standards and guidelines. It is anticipated that no adverse environmental impacts will be generated from the proposed development.

Traffic

- 6.23 As referred to the TIA report (**Appendix 3** refers), the proposed development will only generate a two-way traffic of 2 pcu/hour and 3 ped/15 min during the AM and PM peak hours respectively with insignificant impact on the traffic flows. It has also illustrated that all surveyed junctions will operate with capacities during both AM and PM peak hours with and without the proposed development. Therefore, it is concluded that the proposed development will result in no adverse traffic impact to the surrounding road networks.

Drainage

- 6.24 A DIA (**Appendix 5** refers) is submitted together with this planning statement. To collect the stormwater at the Application Site, 375mm and 450mm u-channels are proposed at the periphery of the Site, which would finally be diverted to the existing channel to the west of the Application Site. With no change in the existing flow paths, the existing streamcourse is also assessed to operate with sufficient capacity to convey the total flow of the proposed residential development. With the provision of the proposed drainage system, the proposed development would not cause adverse drainage impacts or increased flooding susceptibility of the surrounding areas.

Sewerage

- 6.25 It is noted that no public sewerage connection is available at the Application Site. The proposed sewage system will be the same as the last approved planning application for proposed holiday camp (No. A/TM/469). With no adverse comments from the EPD on the proposal from the sewerage planning perspective on the last rezoning application (No. Y/TM/31) and planning application, there would not be any adverse impact foreseen on the sewage disposal.

No Creation of Undesirable Precedent

- 6.26 Having realized the Board is entitled to consider planning applications, there may be concerns about setting an undesirable precedent by approving the current application. The proposed development should be considered an exceptional case given its unique circumstances, which would be difficult to replicate in other cases. The Application Site is located on a relatively small "REC" zone, which only covers the Application Site and the adjacent private lot, and is enveloped by the surrounding Government land of the knoll zoned "OU(PRSC)". As the Application Site has been abandoned for over 3 decades, the proposed development can encourage maximization of

land utilization and assist the Government in providing private housing supply. With the support of submitted technical assessments along this application, the proposed development will not cause adverse impacts to the surrounding areas.

- 6.27 As the Board will consider each planning application on its individual merits, which in a sense, physical states of and surrounding the Application Site are always assessed individually and differently even if they are of similar nature. Approving the current application should therefore not entail to the approval of other similar applications under any circumstances.

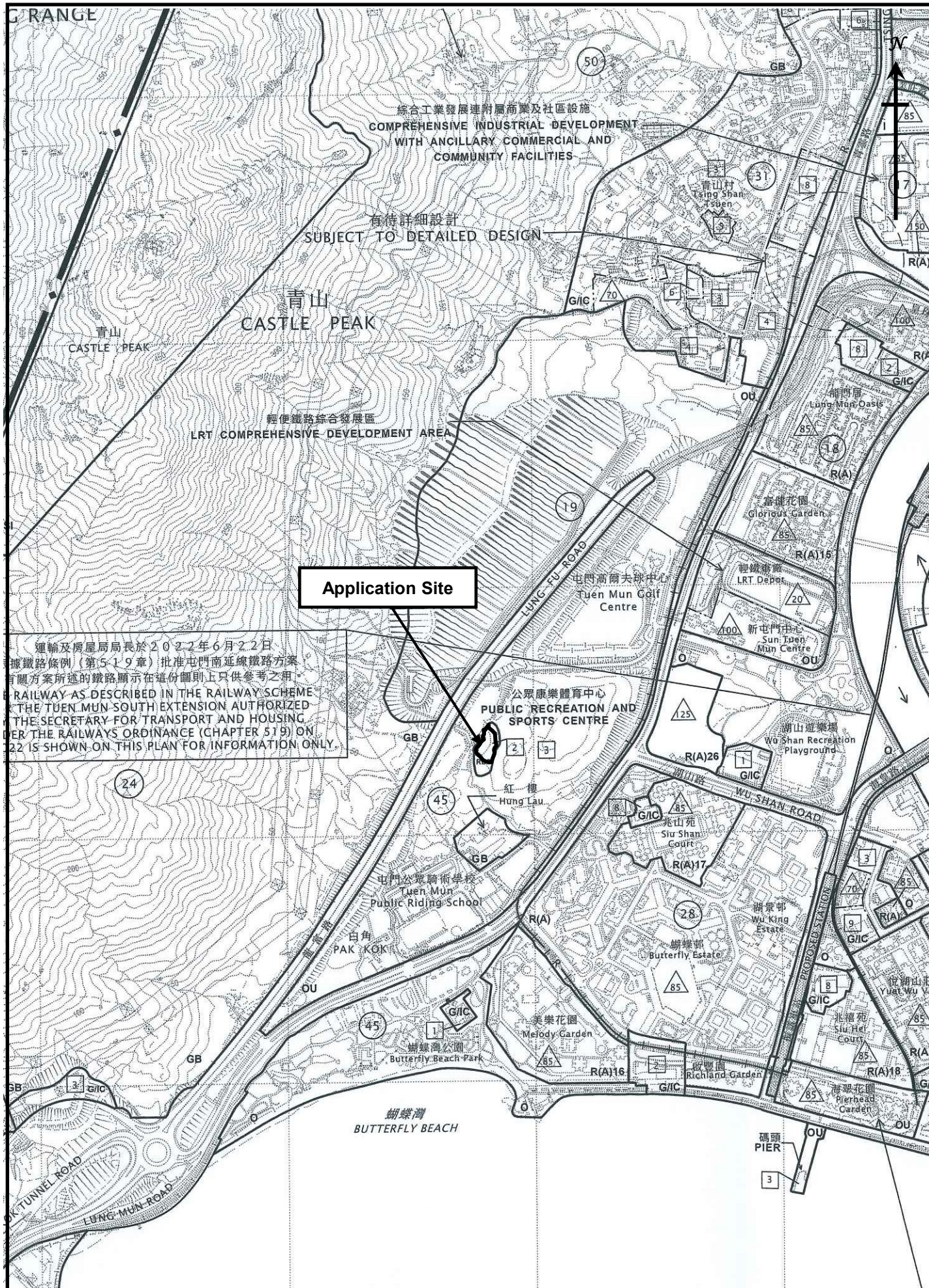
7. CONCLUSION

- 7.1 The Application Site falls within the “REC” zone on the approved Tuen Mun OZP No. S/TM/41. The Applicant proposes for a single 2-storey house development with the anticipated completion date of around 2031. The proposed development is intended to revitalize the current idled site with environmental improvement and upgrading whilst supporting the Government’s policy to increase housing supply in the market.
- 7.2 The Application Site is located in the close proximity of public road network and LRT stations. Its locality is characterized by residential and recreational developments. The proposed development, which is under an acceptable development intensity with sensitive design, is therefore compatible with the surrounding developments and suitable to be located at the Application Site.
- 7.3 The implementation of the present proposed development will replace the existing unsightly environment with a carefully designed residential development in terms of proper built-form and landscape arrangement. Thus, it encourages better utilization of land resources whilst responding to the changing planning circumstances in the surrounding areas and Hong Kong.
- 7.4 Technical assessments (Landscape Proposal with Tree Survey Report, EA, TIA, GPRR and DIA) have been conducted to ascertain that the indicative scheme will not result in adverse impacts on its surrounding areas. Sufficient mitigation measures will be carried out during the construction and operation of the proposed development to ensure no interface problem will be created. Given the unique circumstances and background of the application, it will also not create any undesirable precedent.
- 7.5 In view of the justifications as presented in this planning statement, we sincerely seek the favourable consideration from members of the Board and relevant Government departments to approve this planning application.

Lawson David & Sung Surveyors Ltd.
August 2025

Figures

- Figure 1 Location Plan
- Figure 2 Lot Index Plan
- Figure 3 The Application Site and its Surrounding
- Figure 4 Master Layout Plan
- Figure 5 Floor Plans
- Figure 6 Elevations
- Figure 7 Sections



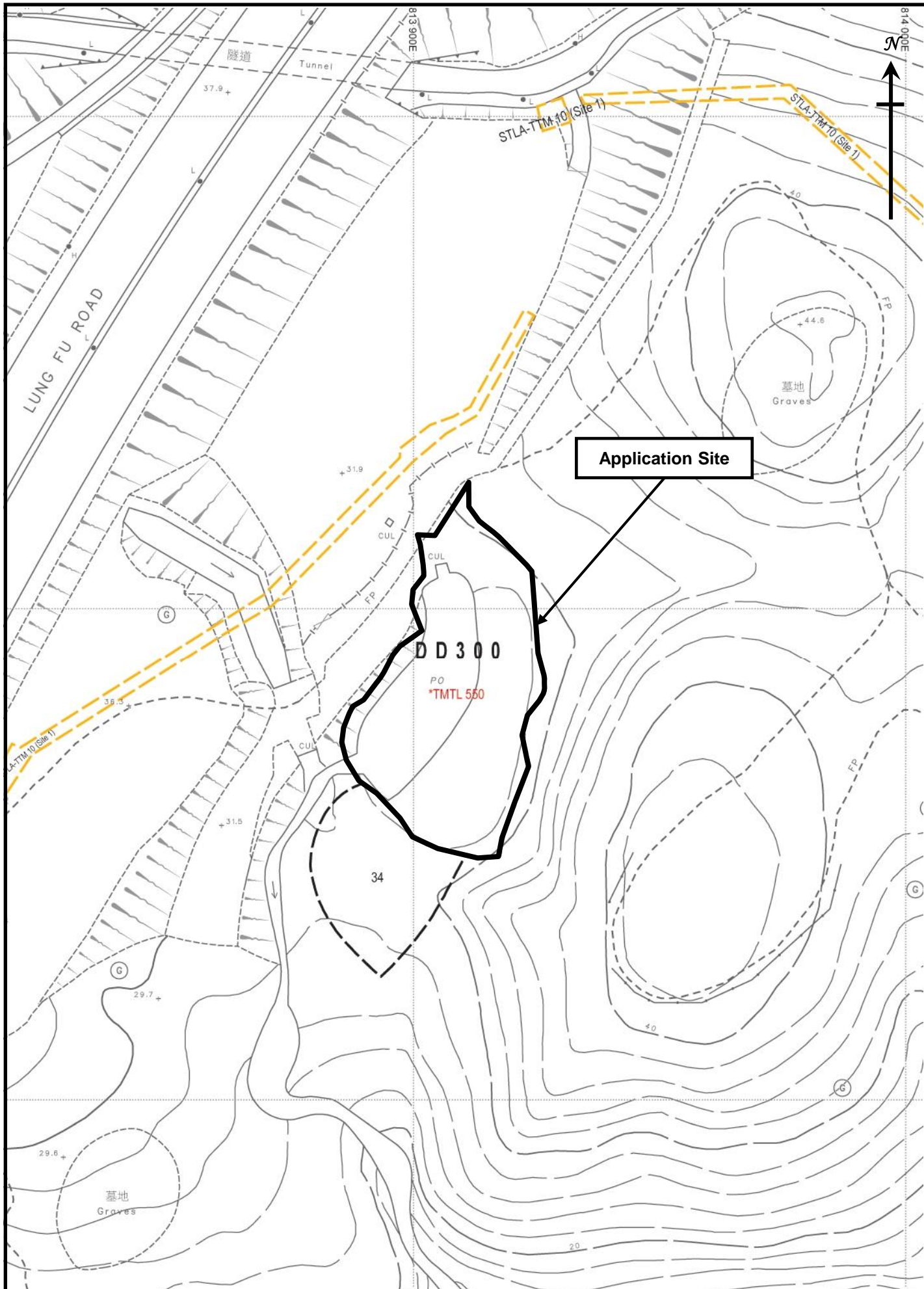
Location Plan
(Extract from Approved Tuen Mun Outline Zoning Plan
No. S/TM/41)

Figure 1

1 : 10000



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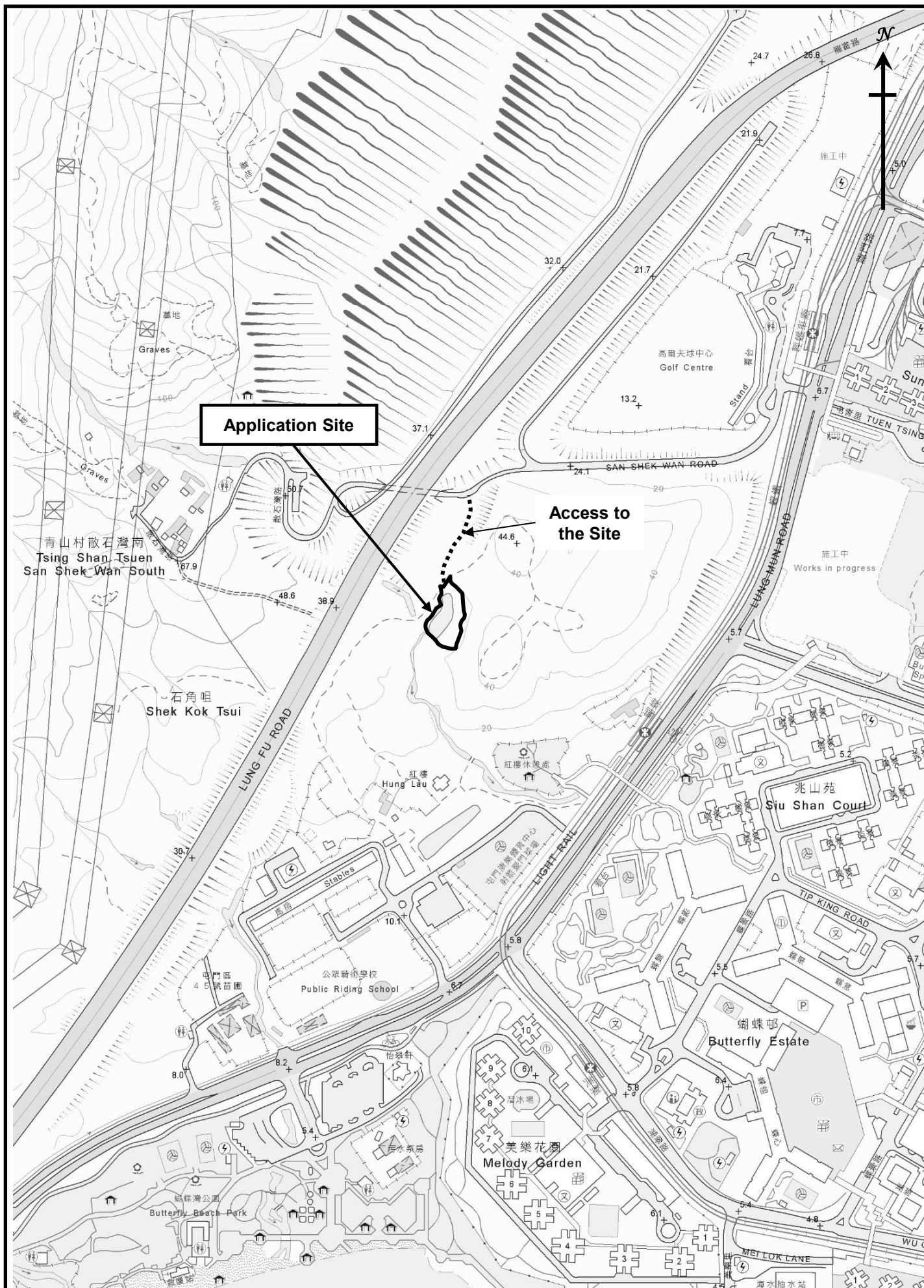
Lot Index Plan

Figure 2

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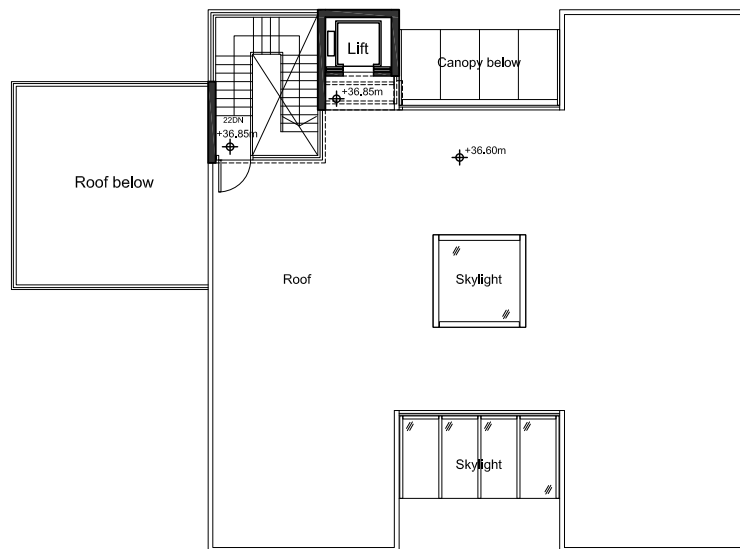
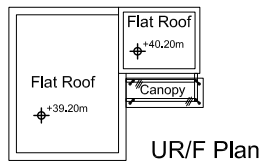
The Application Site and its Surrounding
(Extract of Survey Sheet Nos. 5-SE-B and 5-SE-D)

Figure 3

1 : 5000



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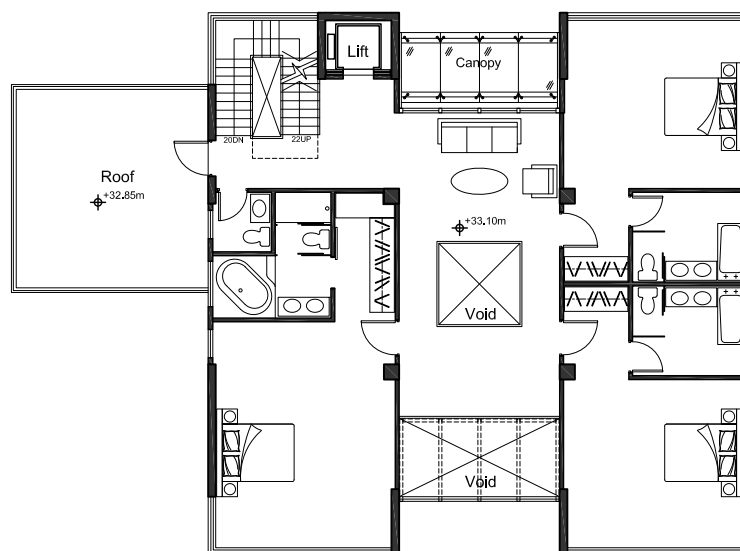


GFA & Plot Ratio Calculation

Total GFA
 = G/F 189.135 + 0.949 (Guardroom)
 [Exemption for F.S. Tank & Pumps
 Enclosure, Carport (28.60), and
 area covered by canopy (8.181)
 to be applied to BD and LD]
 + 1/F 180.316
 [Exemption for 1/F Void near South
 Elevation (8.819) & R/F Stair Hood
 and Lift (17.723) to be applied to
 BD and LD]
 = 370.400 m²

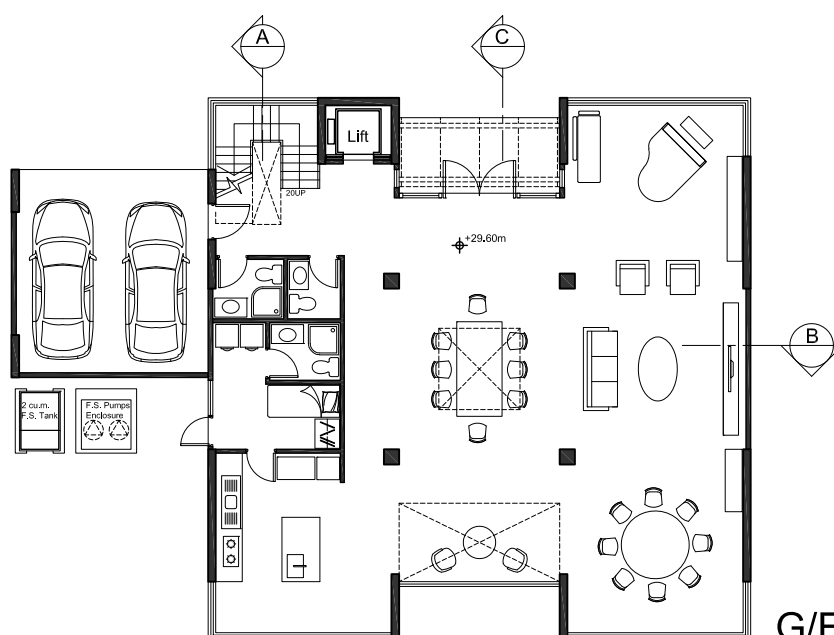
Site Area
 = 1852 m²

Plot Ratio
 = 370.400 / 1852
 = 0.2000



Site Coverage Calculation

Site Coverage
 = (217.735 + 0.949)
 [Exemption for area covered by
 canopy (8.181) to be applied]
 / 1852 x 100%
 = 11.808% < 20%



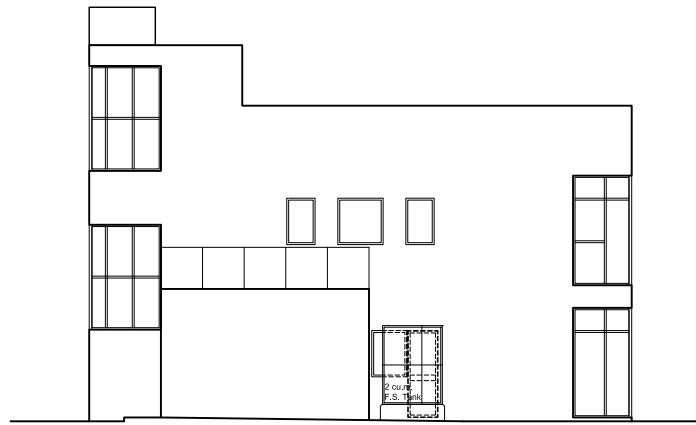
Proposed House Development
 at Tuen Mun Town Lot No. 550
 (TMTL 550), Tuen Mun, N.T.

Design Consultant Limited
 27 August 2025

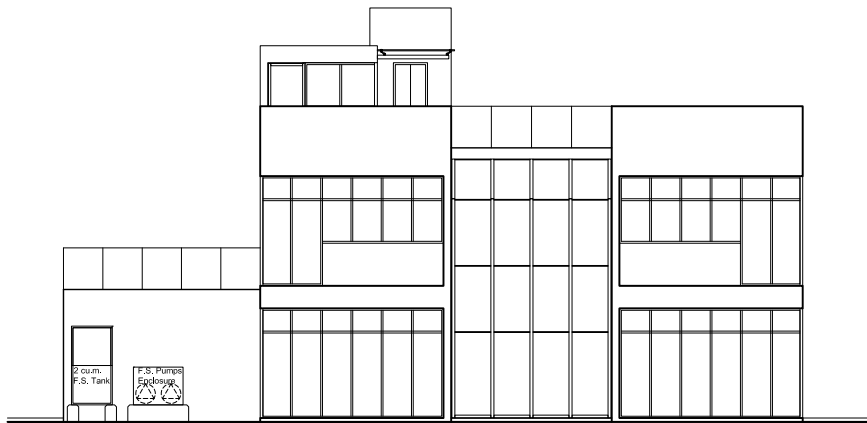
FIGURE 5
 FLOOR PLAN

0 2 4 6 8 10m

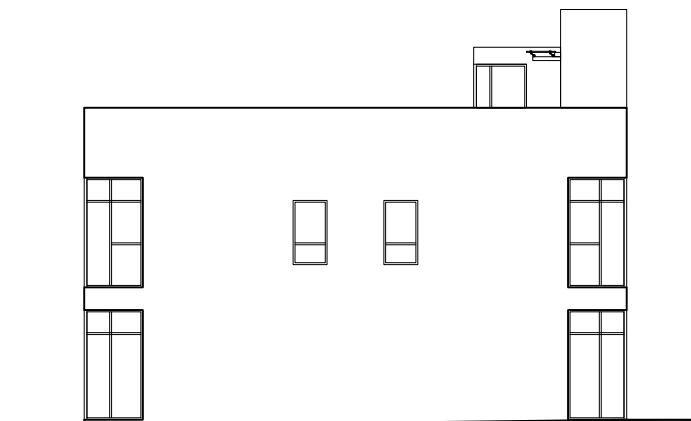




West Elevation



South Elevation



East Elevation



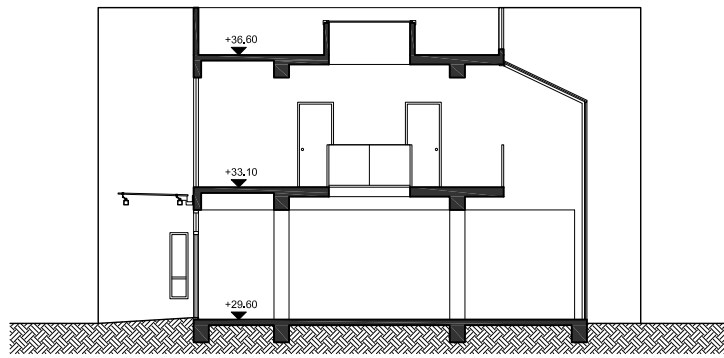
North Elevation

Proposed House Development
at Tuen Mun Town Lot No. 550
(TMTL 550), Tuen Mun, N.T.

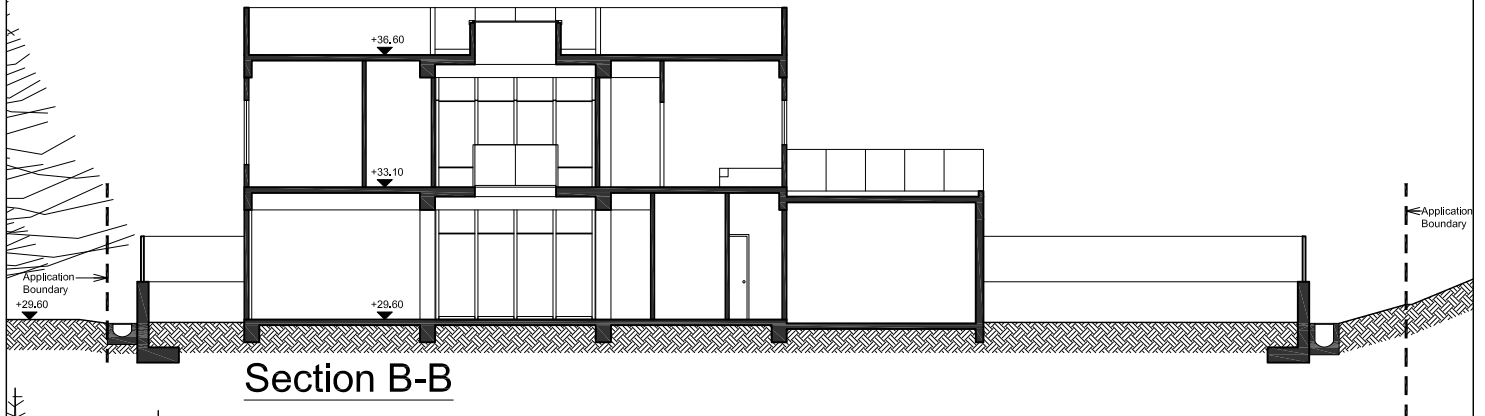
Design Consultant Limited
7 July 2025

FIGURE 6
ELEVATIONS

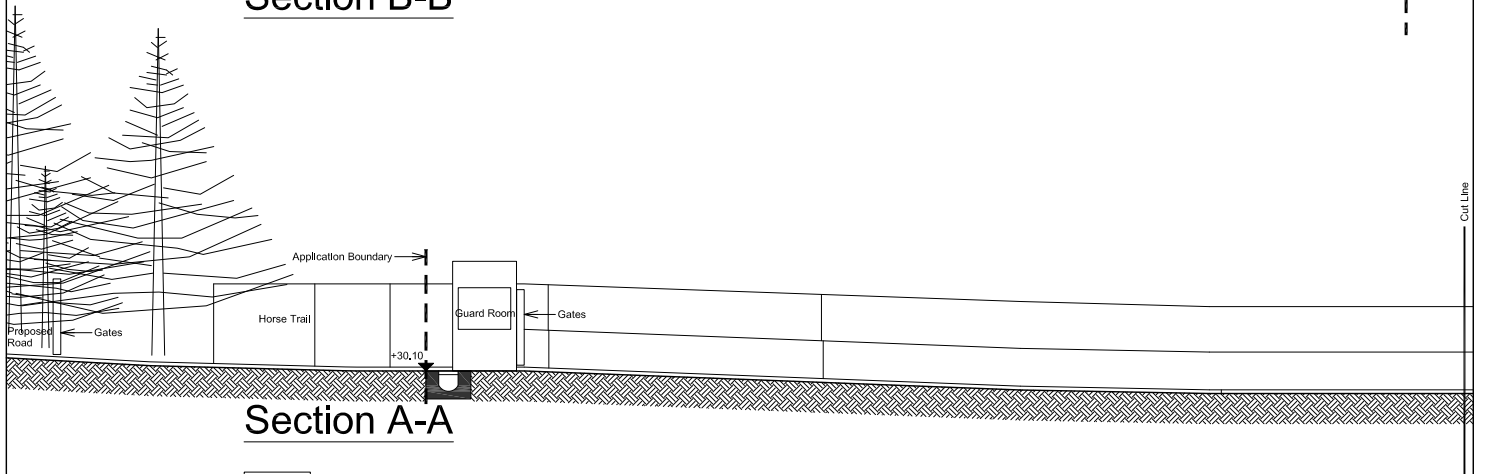




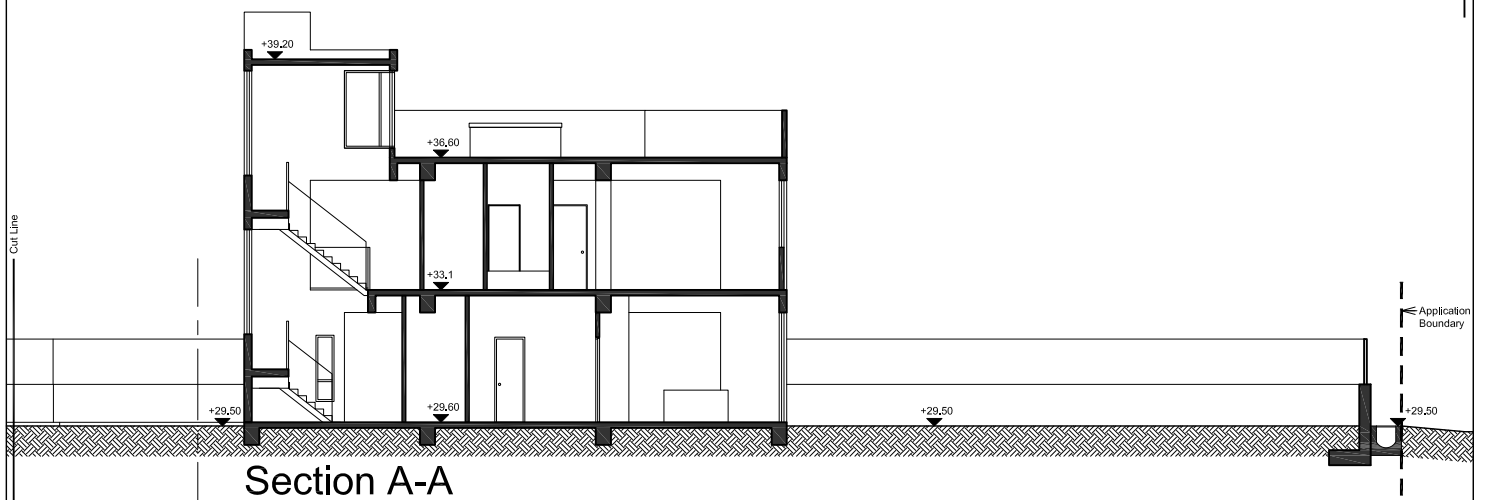
Section C-C



Section B-B



Section A-A

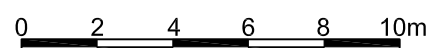


Section A-A

Proposed House Development
at Tuen Mun Town Lot No. 550
(TMTL 550), Tuen Mun, N.T.

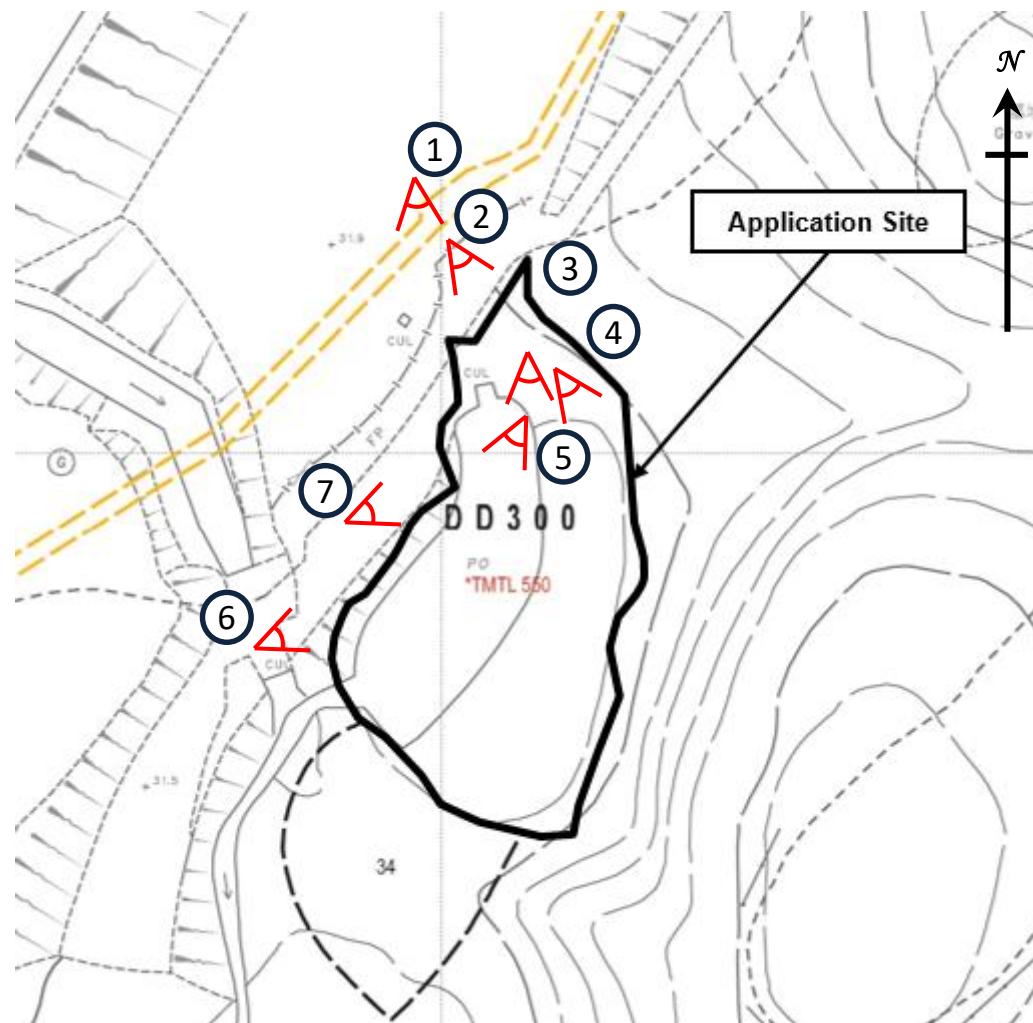
Design Consultant Limited
7 July 2025

FIGURE 7
SECTIONS





Site Photos

Photo Plate 1	Existing Conditions of the Application Site
Photo Plate 2	Surrounding Land Uses



Legend:

-  Viewpoint of the Photo
-  Photo No.
(Photos taken on 15.5.2025)



Existing Conditions of the Application Site

Photo Plate 1



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