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davies**

ARCHITECTS PLANNERS DESIGNERS
Llewelyn-Davies Hong Kong Ltd

9 June 2026

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



By Hand and Email

Dear Sir

Section 16 Planning Application for Proposed Minor Relaxation of Building Height Restriction for Permitted Flat Use at TMTL 569, Tuen Mun, New Territories (Application No. A/TM/604)

Reference is made to the captioned planning application with its receipt acknowledged by the Town Planning Board (the Board) on 8 March 2026. Since then, comments from district planning and urban design perspectives were received via District Planning Office / Tuen Mun and Yuen Long West, Planning Department in April 2026. Public comments were also received during the public inspection period of the subject S16 planning application. In response to the comments received, the Applicant wishes to provide the following responses to further substantiate the application. Please note this submission supersedes the submissions made on 2 June 2026 and 8 June 2026.

1. Comprehensively reviewed the submitted scheme in response to departmental comments and public concerns

After thoroughly review the departmental and public comments received, the Applicant has revised the submitted scheme. Under the latest proposed scheme, the proposed building height has been reduced from 117.6mPD to 109.2mPD. The proposed increase of height (i.e. + 9.2m) is now solely due to relocation the originally underground car park to above-ground in response to the latest Government initiatives. All other changes of building height (e.g. changes in clubhouse floor height; top residential floor height and incorporation of refuge floor) are now deleted. For details, please refer to the updated scheme in **Enclosure 1 – Updated Planning Statement** for review. A Responses-to-comments table is also provided in **Enclosure 2** for further consideration.

2. The magnitude of increase in height due to relocation of car park is justifiable with design considerations

The Applicant has tried her best effort to work out a compatible scheme with aboveground car park. Under the current proposed scheme, the Applicant has significantly reduced the magnitude of proposed increase of building height from 17.6% to 9.2% solely for accommodating the 2-storeys aboveground car park serving the residential development. The proposed increase of height is considered justifiable due to the design considerations as elaborated below:-

.../2

- The subject Proposed Development has to accommodate a Public Transport Terminus (PTT) at G/F in the Application Site as per requirement under Lease. With respect to the design requirements of the PTT; minimum width for two-way traffic of 5.5m; and desirable gradient for car ramp of 1:10, a longer and more sizeable vehicular ramp (about 100m long) has to be provided for leading the vehicles from the ingress / egress at Hoi Chu Road to the car parking floors at the floors above the PTT. The area available for aboveground car park is therefore constrained and 2-storey car park levels are required for provision of the necessary car parking spaces serving the subject proposed residential development;
- For aboveground car park at podium, due consideration has to be given to a lesser floor area available for accommodation of car parking spaces. Under the Approved GBP, with basement car park design, the car parking provision can be optimized at basement floor because no electrical and mechanical (E&M) facilities were provided at basement due to their technical requirements. In comparison, a majority of E&M plant rooms that rely on external louver for ventilation are required to locate at-grade or aboveground. Also with consideration to the designation of non-building areas as required under Lease; provision of building separations for compliance with Sustainable Building Design Guidelines (SBDG); and respecting the maximum permissible site coverage under Building (Planning) Regulations, the area available for aboveground car park at podium levels is constrained and 1-storey car park level to accommodate all required ancillary car parking spaces of the subject residential development is area-wise infeasible;
- To facilitate subsequent handover of the PTT to relevant Government authorities for operation and maintenance, plant rooms serving the PTT have to be provided in close proximity to the PTT. Therefore, in addition to the mechanical ventilation and maintenance platform situated at the upper part of the PTT, a significant portion of floor area at M/F are reserved for essential plant rooms serving the PTT. Based on the engineering and structural inputs currently available, it is considered prudent and reasonable to design the car park spaces at levels above the M/F under the subject S16 Proposed Scheme;
- The Applicant has tried her best to control the proposed magnitude of increase of overall building height as minor as possible. To optimise use of floor space, the car parking spaces at the two levels of car parks have already been co-located with other necessary E&M facilities such as filtration plant room for the swimming pool; portable water tank; and flushing water tank and pump rooms serving the proposed residential development. 2/F car park spaces are also co-located with the sunken swimming pool tank;

Overall speaking, the magnitude of increase of height for car park at aboveground is considered reasonable for accommodating the car parking needs serving the subject residential development, providing sufficient headroom for private cars; reservation of floor spaces for E&M and ancillary facilities, etc.

3. Incorporation of design merits and features

In formulating the current updated scheme for the Proposed Development, much effort have been devoted to incorporating design merits to the residential development:

- *At-grade greenery*: The Applicant has tried her best effort to incorporate additional street-level greenery to promote visual interest and to soften the building mass as visually perceived by the public. On top of the 20% greenery provision required to be provided in the subject development, a street-level greenery (with a total area of about 50m²) is committed along the western boundary at the G/F. The proposed G/F greenery will be in the form of both at-grade planters as well as vertical green. It should be highlighted that the Applicant has exhausted possible areas for provision of low-zone greenery, as no planter shall be installed in other at-grade area to facilitate subsequent handover of PTT to Transport Department for management.
- *Non-building Areas and Building Separations*: Non-building areas and building separations have been incorporated in the subject S16 proposed scheme to promote permeability:
 - i. Along the western boundary, a “non-building area with a width of 2.4m” has been provided. This non-building area also complies with the requirement under Lease (i.e. Pink Hatched Blue area);
 - ii. Along the western boundary, a non-building area with a width of 12m only for the level at, above or over 23mPD is required under Lease (i.e. Pink Patched Black area). Under the subject S16 proposed scheme, the Applicant acts further and commits a “full-height” building separation with a width of about 12m to promote permeability. This building separation would also help to comply with the minimum 20% permeability requirement under Sustainable Building Design Guidelines (SBDG) (PNAP APP-152);
 - iii. Along the southern boundary, a non-building area with a width of about 1.3m has also been provided. This non-building area also complies with the requirement under Lease (i.e. Pink Stippled Black area);

- iv. Along the northern boundary, a strip of non-building area with a width of about 1.2m along the boundary abutting Hoi Chu Road is provided. This non-building area also complies with the requirement under Lease (i.e. Pink Stippled Blue area); and
 - v. Along the eastern boundary, the Applicant commits another building separation with a width ranging from about 4m to 7.5m. Other than a minor structure for Genset Room, Sprinkler Control Valve Room and Fire Control Room to serve the PTT, this building separation could contribute to promote permeability along the interface with the adjacent Hoi Chu Road Playground. This separation would also help to comply with the requirements under SBDG¹.
- *Good Building Design Features:* The Proposed Development will adopt the following building design features to promote permeability and visual interests as viewing from pedestrian level:
 - The G/F PTT will adopt minimal column design to facilitate penetration of air. The western and eastern sides of the PTT will also be uncovered to promote permeability;
 - The car park on 1/F and 2/F will not be fully enclosed but with open-able voids to facilitate natural ventilation as well as visual permeability when viewing from Hoi Chu Road and from Light Rail; and
 - In reality, the building façade would not be a blank façade treatment. The Applicant would explore various ways to improve the visual interests of the building façade at subsequent detailed design stage as far as practical. For example, a mixture of building materials such as multiple tones and textures will be considered. Façade will be articulated in contour to enrich built form. Such façade treatment can effectively soften the perceivable building mass as visually perceived in its surroundings.

4. Optimal building form with consideration to the site constraints

The building form and disposition is considered optimal and sensible in view of the site constraints that affect the scheme design:

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¹ According to PNAP APP-152, the requirement on minimum separation is 3m and mean width is 7.5m to achieve the required permeability. The minor structure serving the PTT can be disregarded due to its limited height, thus its existence does not affect compliance with PNAP APP-152.

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- To meet relevant air quality standard, an air sensitive zone is designated along the northern site boundary. The building form is “restrained” with prohibition of designing any air sensitive use (e.g. habitable room with open-able windows) facing Hoi Chu Road. This air sensitive zone also complies with the requirement under Lease (i.e. Pink Stippled Red area);
- To meet relevant safety standard of the Light Rail, the disposition of the residential building has to be set-back from the Light Rail track so as to avoid any objects falling from the open-able windows of the residential units to the Light Rail track; and
- Acting under a small site area of about 4,368m², no portion of the building shall encroach into the non-building areas on northern, southern and western boundaries as per requirements under Lease. In order to meet the SBDG requirement, the building should also be set-back from the common boundary from Hoi Chu Road Playground and Oceania Heights.

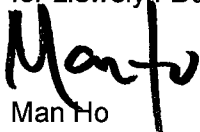
Acting under the above design constraints, the building form and disposition under the current proposed scheme has already been optimized without depriving the entitled development right under Lease and the OZP.

Summary

After thoroughly reviewed the submitted scheme with provision of additional design merits and justifications, the Applicant should have already addressed all departmental and public concerns. We hereby sincerely request the captioned planning application to be considered by the Board at the soonest.

Thank you for your kind attention. Should there be any queries, please do not hesitate to contact the undersigned at [REDACTED] or our Miss Cody Yu at [REDACTED].

Yours faithfully
for Llewelyn-Davies Hong Kong Ltd



Man Ho
Associate Director

MH/cy
Encl.

cc (w/ encl)
DPO/TM&YLW

Attn.: Mr. Brian CHAU / Mr. Chris LEUNG

(by email)

Enclosure 1

Updated Planning Statement

Section 16 Planning Application for Proposed Minor Relaxation of
Building Height Restriction for Permitted Flat Use at TMTL 569, Tuen
Mun, New Territories

**llewelyn
davies**

ARCHITECTS PLANNERS DESIGNERS
Llewelyn-Davies Hong Kong Ltd

In association with

LWK & Partners (HK) Limited

June 2026

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EXECUTIVE SUMMARY

The subject planning application is submitted to the Town Planning Board (the Board) in support of proposed minor relaxation of building height restriction for permitted 'Flat' use at Tuen Mun Town Lot 569, Tuen Mun, New Territories (hereafter referred to as "Application Site") in "Residential (Group A)29" ("R(A)29") zone on the Approved Tuen Mun Outline Zoning Plan (OZP) No. S/TM/41 under Section 16 (S16) of the Town Planning Ordinance (the Ordinance) (CAP. 131).

The Application Site is currently zoned "R(A)29" with a building height restriction of 100mPD imposed thereon. A set of General Building Plans (GBP) for permitted residential development (hereafter referred to as the "Approved GBP Scheme"), with all development parameters conforming to the OZP restrictions, was approved in February 2026. Under the Approved GBP Scheme, there is 1 storey of basement carpark.

Following the announcement in 2025 Policy Address, the Government promulgated the enhanced gross floor area (GFA) exemption arrangements for carpark in private development projects in November 2025 to allow full GFA exemption for not more than two levels of aboveground carpark, while eliminating the prerequisite of constructing some of the carpark underground. At the same time, to facilitate the implementation of such enhanced arrangements, the Government announced that the town planning procedures will be streamlined for approving relaxation of building height restriction relevant to aboveground carpark. The above measures have already taken effect starting from November 2025.

In response to the abovementioned policy initiative, the current planning application proposing minor relaxation of building height restriction from 100mPD to 109.2mPD (+9.2m / 9.2%) is hence submitted to facilitate the incorporation of aboveground carpark design for the permitted residential development (hereafter referred to as "Proposed Development").

Major justifications in support of the Proposed Development are listed as follows:

- The Proposed Development is in line with the Government's latest policy of facilitating provision of aboveground carpark;
- The magnitude of increase in building height is well justified given the site and design constraints; and the Proposed Development is compatible with the surrounding context;
- Design merits have been proposed; and
- The Proposed Development will not induce adverse visual and other technical impacts.

In light of the justifications presented in this Planning Statement, the Board is cordially invited to consider this planning application favourably.

行政摘要

(聲明：此中文譯本僅供參考，如中文譯本和英文原文有歧，應以英文原文為準。)

申請人現根據城市規劃條例第 16 條(第 131 章)，向城市規劃委員會(下稱「城規會」)遞交規劃申請，擬議在屯門市地段 569，於屯門分區計劃大綱核准圖編號 S/TM/41 被劃為「住宅(甲類)29」地帶的申請地點略為放寬建築物高度限制，作經常准許的分層住宅用途。

申請地點現時被劃作「住宅(甲類)29」地帶，其建築物高度限制為不多於主水平基準以上 100 米。申請地點於 2026 年 2 月獲批准一套作住宅發展的建築圖則(下稱「已核准方案」)。已核准方案的所有發展參數均符合分區計劃大綱圖的限制，並設有一層地庫停車場。

在 2025 年施政報告公佈後，政府於 2025 年 11 月相繼公佈了經優化的私人發展項目停車場總樓面面積豁免安排，容許地面不多於兩層停車場的總樓面面積獲全數豁免，亦毋須以興建部分停車場於地庫作為先決條件。與此同時，為配合優化措施的實施，政府亦會簡化城規程序，以批准與興建地面停車場相關的建築物高度限制放寬。上述措施已於 2025 年 11 月生效。

基於上述政策，申請人現提交規劃申請，擬議將建築物高度限制由主水平基準以上 100 米放寬至主水平基準以上 109.2 米(增加 9.2 米/9.2%)，在經常准許的住宅發展中加入地面停車場(下稱「擬議發展」)。

以下為支持擬議發展的理據：

- 擬議發展符合政府優化私人發展項目設置地面停車場的總樓面面積豁免政策；
- 擬議建築物高度的放寬幅度有充分理據支持，並將與周遭環境相符；
- 申請人提出了設計增益；和
- 擬議發展不會導致視覺及其他技術層面的負面影響。

基於以上的發展理據，現懇請城規會批准是次規劃申請。

1 INTRODUCTION

1.1 Background

- 1.1.1 This planning application is submitted to the Town Planning Board (the Board) under Section 16 (S16) of the Town Planning Ordinance (CAP. 131) (the Ordinance) in support of proposed minor relaxation of building height restriction for permitted 'Flat' use at Tuen Mun Town Lot (TMTL) 569, Tuen Mun, New Territories (hereafter referred to as "Application Site").
- 1.1.2 The Application Site is currently zoned "Residential (Group A)29" ("R(A)29") on the Approved Tuen Mun Outline Zoning Plan (OZP) No. S/TM/41 (**Figure 1.1** refers), subject to maximum plot ratio of 6 and building height of 100mPD.
- 1.1.3 A set of General Building Plans (GBP) for residential development at the Application Site, with all development parameters conforming to the OZP restrictions, was submitted in December 2025 and approved in February 2026. Under the said GBP, the building height at main roof was 100mPD with a plot ratio of 6. 1 storey of basement carpark was proposed (hereafter referred to as the "Approved GBP Scheme").

1.2 Purpose of Submission

- 1.2.1 Following the announcement in 2025 Policy Address, the Government promulgated enhanced gross floor area (GFA) exemption arrangements for carpark in private developments in November 2025, allowing full GFA exemption for not more than 2 storeys of aboveground carpark with elimination of the prerequisite of providing underground carpark. At the same time, to facilitate implementation of such enhanced arrangements, it is announced that the town planning procedures will be streamlined for approving minor relaxation of building height restriction relevant to the provision of aboveground carpark. These measures have come into effect since November 2025.
- 1.2.2 In response to the abovementioned latest policy, the Applicant proposes minor relaxation of building height restriction from 100mPD to 109.2mPD (i.e. +9.2m / +9.2%) to facilitate the incorporation of aboveground carpark in the permitted residential development (i.e. 'Flat' use) (hereafter referred to as the "Proposed



Application Site R(A)29



Title
 Extract of the Approved Tuen Mun Outline Zoning Plan
 No. S/TM/41

Checked	DH	Drawn	PW
Rev	0	Date	Jun 2026
Scale	Figure		
NA	1.1		

Development" / "Proposed Scheme"). It is against this background that the Applicant would like to seek permission from the Board for minor relaxation of building height restriction.

1.2.3 As detailed in following sections, the Proposed Scheme is similar to the Approved GBP Scheme in terms of general layout, building disposition and floor-to-floor heights. The major difference is the relocation of basement carpark to above-ground. Some additional planning and design merits have also been incorporated in the Proposed Scheme.

1.3 Report Structure

1.3.1 This Planning Statement consists of the following sections:

- Section 2: describes the Application Site, its surrounding context and policy context;
- Section 3: presents the indicative development proposal;
- Section 4: summarises the technical considerations;
- Section 5: presents the planning justifications for the Proposed Development; and
- Section 6: concludes the Planning Statement.

2 SITE AND PLANNING CONTEXT

2.1 Site and Surrounding Context

2.1.1 The Application Site is located in the southern part of Tuen Mun New Town. The site area is about 4,368m²¹.

2.1.2 The Application Site is accessible by Hoi Chu Road to its immediate north. The Application Site can also be easily accessed by Light Rail Transit, as Goodview Garden Stop is to the southeast of the Application Site. To the west of the Application Site is the future A16 Station of Tuen Ma Line (**Figure 1.1** refers).

2.1.3 The Application Site lies in a well-developed residential community with multiple completed residential developments and schools. Housing estates like Goodview Garden, Oceania Heights and Nerine Cove are to the north, west and southwest of the Application Site respectively. Schools like Yan Chai Hospital Ho Sik Nam Primary School and Ching Chung Hau Po Woon Secondary School are to the northwest and south of the Application Site respectively. To the immediate east of the Application Site is Hoi Chu Road Playground.

2.2 Planning and Policy Context

Enhanced GFA Exemption Arrangements for Aboveground Carpark

2.2.1 Subsequent to the announcement of 2025 Policy Address, the Government has promulgated in November 2025 the enhanced arrangements to allow full GFA exemption for not more than two levels of aboveground carpark while eliminating the prerequisite of providing underground carpark.

2.2.2 To facilitate such latest arrangements, streamlined town planning approach will be adopted for planning application for minor relaxation of building height restriction to accommodate not more than 2 storeys of aboveground carpark. A simple visual appraisal would suffice for these planning applications. In the case where the application site falls within major breezeways, a simple review of air ventilation impacts is required in support of the relevant planning applications. The above measures have taken effect starting from November 2025.

¹ Same as the site area as stated under lease of the subject lot (i.e. TMTL 569).

Planning Context

- 2.2.3 The Application Site falls within an area zoned "R(A)29" on the Approved Tuen Mun OZP No. S/TM/41. According to the Notes of the OZP (**Appendix A** refers), the Application Site is subject to a plot ratio restriction of 6 and building height restriction of 100mPD. 'Flat' and 'Public Transport Terminus or Station (excluding open-air terminus or station)' uses are under Column 1, i.e. always permitted. In determining the maximum plot ratio, any floor space that is constructed or intended for the use solely as public transport facilities, as required by the Government, may be disregarded. Based on individual merits of a development or redevelopment proposal, minor relaxation of the building height restriction may be considered by the Board on application under S16 of the Ordinance.
- 2.2.4 According to the Explanatory Statement of the OZP, the "R(A)29" zone is intended for private residential development. A public transport terminus (PTT), as required by the Government, shall be provided. Opportunities for maximising the buffer distance between the residential tower of the Proposed Development at the Application Site and the residential tower of Oceania Heights should be explored.

2.3 Land Status and Approved GBP Scheme

- 2.3.1 The Application Site is a land sale site awarded to the Applicant through tender in August 2025. Thus, the Applicant is the sole owner of the Application Site.
- 2.3.2 After the award of tender, the Applicant has proceeded with detailed design. In December 2025, the Applicant submitted the first set of GBP for residential development at the Application Site. It is an OZP-compliant scheme with building height of 100mPD (at main roof) and plot ratio of 6. Carpark was provided in 1 storey of basement. A PTT, as required by the Government, was proposed on the G/F of the development. Comparison of the Approved GBP Scheme and Proposed Scheme is depicted in **Section 3** that follows.

3 INDICATIVE DEVELOPMENT SCHEME

3.1 Site Constraints that Affect Scheme Design

3.1.1 The Application Site is small in size, with area of about 4,368m² only. Building disposition and design is further constrained by the following factors:

3.1.2 **Non-building area requirements under lease:** according to the lease, some non-building areas (NBAs) within the Application Site are designated (see **Appendix B**). The Pinked Hatched Blue Area under lease indicates an NBA with width of 2.4m and the Pinked Hatched Black Area under lease indicates an NBA with a width of 12m for the level at, above or over 23mPD along the western site boundary. Along southern site boundary, a 1.3m-wide NBA is required (Pink Stippled Black Area under lease). Another 1.2m-wide NBA abutting Hoi Chu Road along the northern site boundary is required (Pink Stippled Blue Area under lease).

3.1.3 **Building separations required by Sustainable Building Design Guidelines (SBDG) (PNAP APP-152):** as required by SBDG, to achieve the minimum 20% permeability requirement, a full-height building separation of about 12m from the western site boundary is needed. Along the eastern site boundary, developments within the Application Site have to setback from Hoi Chu Road Playground. Under the Proposed Scheme, the Applicant commits a building separation with a width ranging from about 4m to 7.5m ² (see **Appendix B**).

3.1.4 **Air Sensitive Area:** according to the lease (see **Appendix B**), abutting the northern site boundary there is an Air Sensitive Area (Pink Stippled Red Area) that prohibits provision of air sensitive uses, such as openable windows. Therefore, the orientation of the residential towers is largely constrained.

3.1.5 **Light Rail Track:** Goodview Garden stop of the Light Rail Transit is located to the southeast of the Application Site and there is light rail track running to the south of the Application Site. To meet relevant safety standard of the Light Rail, the disposition of the residential building has to be setback from the Light Rail track so as to avoid the objects falling from the openable windows of the residential units to the Light Rail track. The setback distance is 20m, as indicated in **Appendix B**. For the portion of residential tower falling within the 20m setback area, mitigation

² According to PNAP APP-152, the requirement on minimum separation is 3m and mean width is 7.5m to achieve the required permeability.

measures such as fins (which is GFA accountable) have to be installed at the Applicant's own expense.

- 3.1.6 **Buildings Ordinance:** To meet regulations on prescribed window, the disposition and building bulk of the residential tower within the Application Site is largely constrained (see **Appendix B** for the prescribed window requirement).

3.2 Indicative Development Scheme

- 3.2.1 With the above site constraints taken into consideration, the Applicant has come up with an optimal scheme. Layout plans of the Proposed Scheme are provided under **Appendix C**. The major development parameters of the Proposed Scheme and comparison with the Approved GBP Scheme are provided in **Table 3.1** below.

Table 3.1 Development Schedule

	Approved GBP Scheme (A)	Proposed Scheme (B)	Difference (B) - (A)
Site area (about) (m²)	4,368	4,368	Nil
GFA (about) (m²)			
• Domestic	• 26,208	• 26,208	• Nil
• PTT ⁽¹⁾	• 1,741 ⁽²⁾	• 1,741 ⁽²⁾	• Nil
Plot ratio (about)			
• Domestic	• 6	• 6	• Nil
• PTT ⁽¹⁾	• 0.4	• 0.4	• Nil
Building height at main roof (not more than) (mPD)	100	109.2	+9.2m / 9.2%
No. of Storeys			
• Aboveground	• 28 ⁽³⁾	• 30 ⁽³⁾	• +2
• Basement	• 1	• 0	• -1
Site Coverage (about)	Domestic: 25.15%	Domestic: 25.15%	Nil
No. of Blocks	1	1	Nil
No. of Units	700	700	Nil
Average Flat Size (about) (m²)	37.5	37.5	Nil

Remarks:

- (1) Exempted from plot ratio calculation.
- (2) Referring to the covered portion of the PTT only.
- (3) Excluding transfer plate.

3.3 Comparison with Approved GBP Scheme

Relocation of Basement Carpark to 1/F and 2/F

3.3.1 The current proposed increase in building height is solely for relocation of the 1-storey basement carpark under the Approved GBP Scheme to 1/F and 2/F in the Proposed Scheme (see **Figure 3.1**), which is in line with the latest enhanced GFA exemption arrangements for aboveground carpark. The Applicant has tried the best effort to work out a compatible scheme with a justified bulk and floor-to-floor height for the 2 storeys of aboveground carpark.

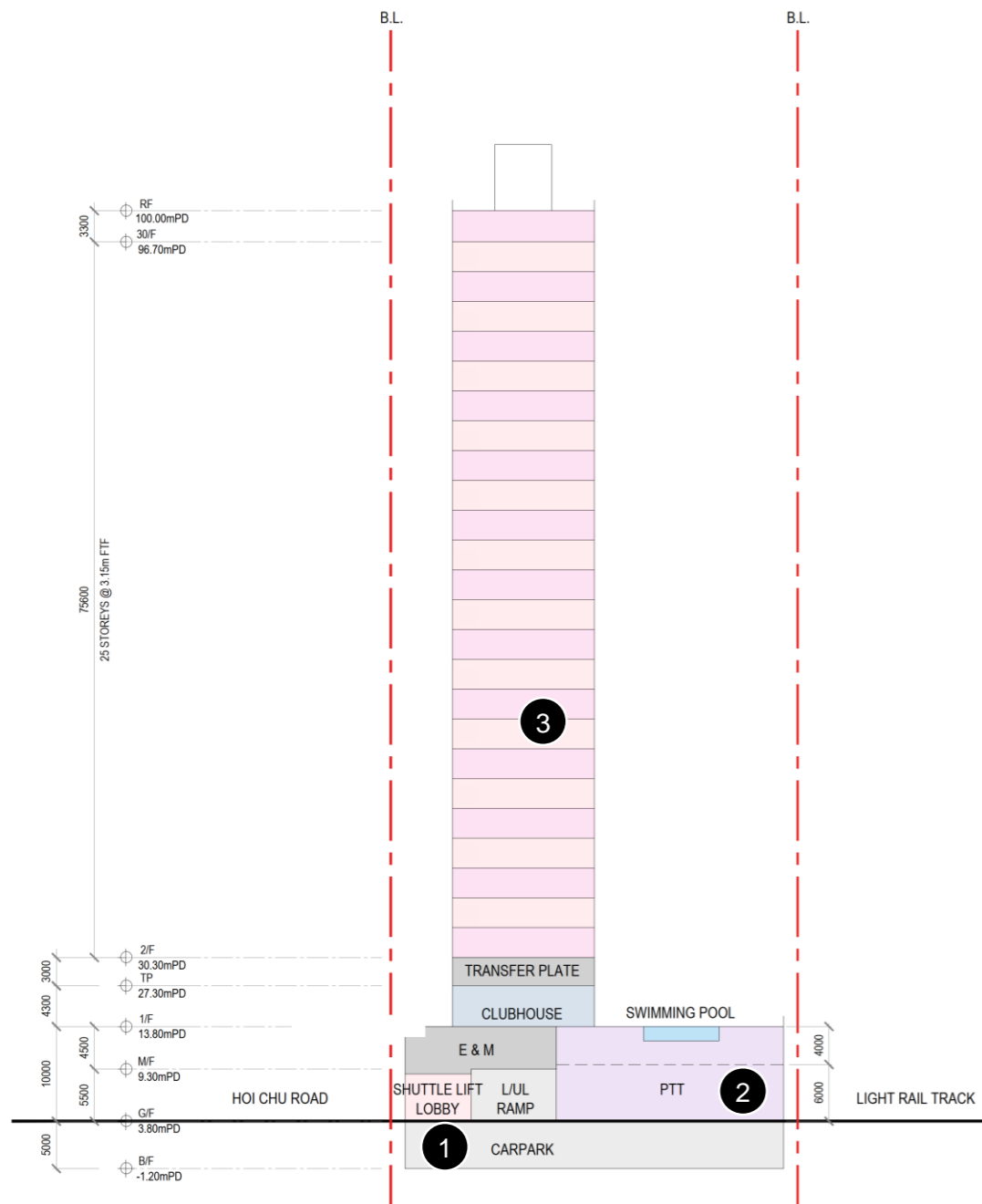
LEGEND:

RESIDENTIAL	CLUBHOUSE
CARPARK / DRIVEWAY	POOL
E&M / TRANSFER PLATE	PTT

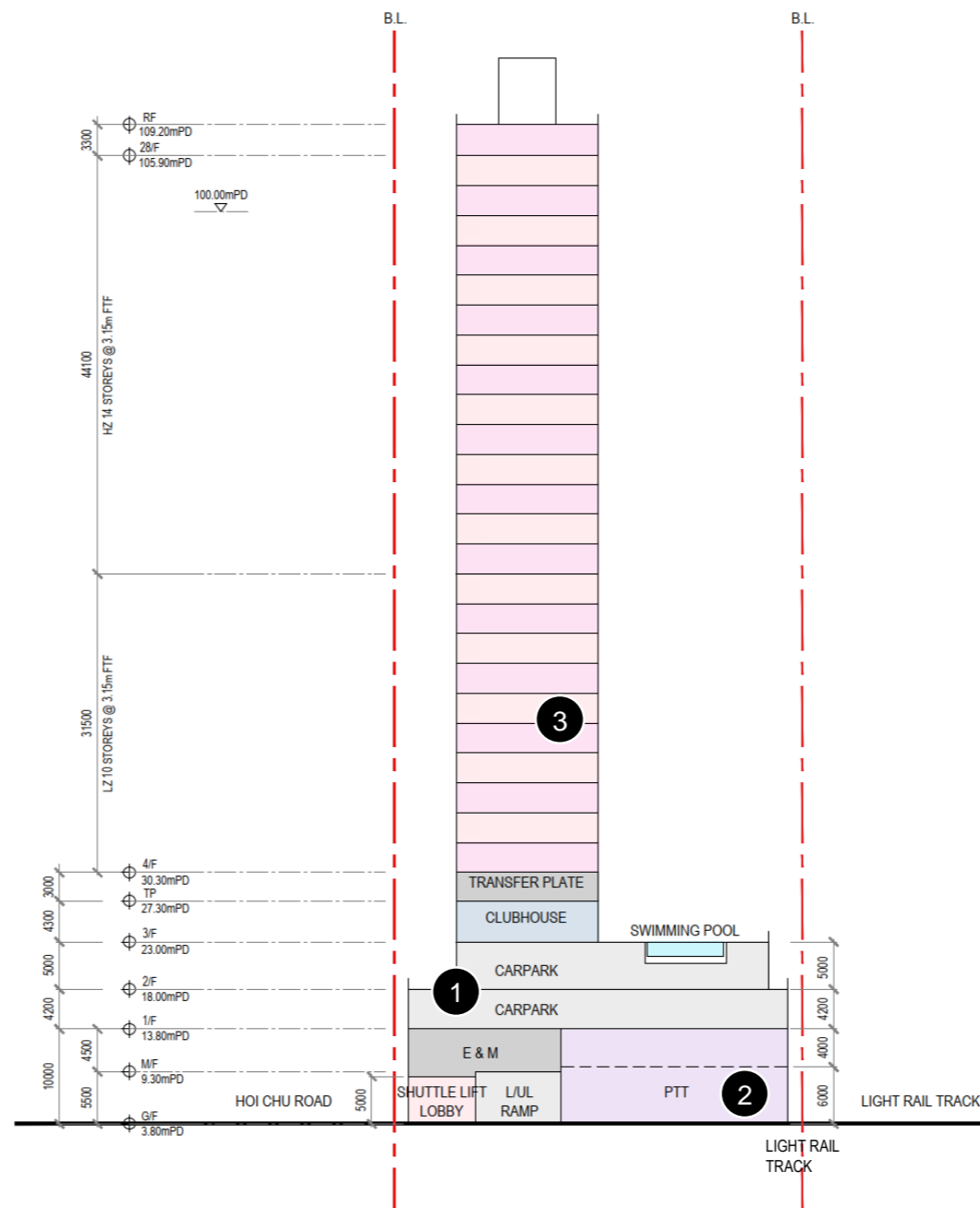
The subject S16 planning application seeks permission for minor relaxation of building height restriction from 100mPD to 109.2mPD (+9.2m / 9.2%) solely due to relocation of the originally underground carpark to aboveground in response to the latest Government initiatives.

Comparison between the Approved GBP Scheme and Proposed Scheme is summarized below:

- The major change under the Proposed Scheme is the relocation of underground carpark to aboveground. 2-storey car park levels are required and the proposed height is considered optimal because:-
 - The provision of PTT will lead to the design of an extra-long vehicular ramp (about 100m long) for serving development traffic connecting the ingresses / egresses to and from the car parking floors located above at 1/F and 2/F. Area available for aboveground car park is therefore constrained;
 - A majority of E&M plant rooms that rely on external louvre for ventilation are required to locate at-grade or aboveground. The area available for aboveground car park at podium levels is constrained and 1-storey car park level to accommodate all required ancillary car parking spaces of the subject residential development is area-wise infeasible; and
 - To optimise use of floor space, the car parking spaces at the two levels of car parks have already been co-located with other necessary E&M facilities such as filtration plant room for the swimming pool; portable water tank; and flushing water tank and pump rooms serving the proposed residential development. 2/F car park spaces are also co-located with the sunken swimming pool tank.
- Floor-to-floor height of the PTT and the under the Approved GBP Scheme and Proposed Scheme is the same, i.e. 10m in total.
- Floor-to-floor height of the residential floors under the Approved GBP Scheme and Proposed Scheme is the same, i.e. 3.15m.



**Approved GBP Scheme
(i.e. Submitted GBP dated Dec 2025)**



**Proposed Scheme
(June 2026)**

Title

Comparison Between the Approved GBP Scheme and Proposed Scheme

Checked		Drawn	
Rev		Date	
Scale		Figure	3.1

- 3.3.2 The car ramp serving the proposed aboveground carpark is inevitably larger than that serving basement carpark. The Proposed Development has to accommodate a PTT on G/F of the Application Site as per lease condition. With respect to the design requirements of the PTT, minimum width for two-way traffic of 5.5m and desirable gradient for car ramp of 1:10, a longer and more sizeable vehicular ramp (about 100m long) has to be provided for leading the vehicles from the ingress / egress at Hoi Chu Road to the carpark on 1/F and 2/F above the PTT. The area available for aboveground car park is therefore constrained and 2 storeys of carpark are required for provision of the necessary carparking spaces serving the subject proposed residential development.
- 3.3.3 For aboveground carpark at podium, due consideration has to be given to a lesser floor area available for accommodation of carparking spaces. Under the Approved GBP Scheme, carparking provision could be optimized at basement floor because no electrical and mechanical (E&M) facilities were provided at basement due to their technical requirements (see basement plan of the Approved GBP Scheme in **Appendix D**). In comparison, a majority of E&M plant rooms that rely on external louver for ventilation are required to locate above-ground. Also with consideration to the designation of non-building areas as required under lease, provision of building separations for compliance with SBDG and respecting the maximum permissible site coverage under Building (Planning) Regulations, the area available for aboveground carpark at podium levels is constrained and thus 1-storey carpark to accommodate all required ancillary carparking spaces of the subject residential development is area-wise infeasible.
- 3.3.4 To facilitate subsequent handover of the PTT to relevant Government authorities for operation and maintenance, plant rooms serving the PTT have to be provided in close proximity to the PTT. Therefore, in addition to the mechanical ventilation and maintenance platform situated at the upper part of the PTT, a significant portion of floor area at M/F are reserved for essential plant rooms serving the PTT. Based on the engineering and structural inputs currently available, it is considered prudent and reasonable to design the car park spaces at levels above the M/F under the subject S16 Proposed Scheme.
- 3.3.5 The Applicant has tried her best to control the proposed magnitude of increase of overall building height as minor as possible. To optimise use of floor space, the carparking spaces at the two levels of carpark have already been co-located with other necessary E&M facilities such as filtration plant room for the swimming pool,

portable water tank, and flushing water tank and pump rooms serving the proposed residential development. 2/F carparking spaces are also co-located with the sunken swimming pool tank.

- 3.3.6 Overall speaking, the increase of height for aboveground carpark is considered reasonable for accommodating the carparking needs serving the subject residential development while allowing necessary structural support, providing sufficient headroom for private cars and reservation of floor spaces for E&M and ancillary facilities, etc.

Similar Design of PTT

- 3.3.7 Under the Approved GBP Scheme, 10m is reserved for the PTT and E&M facilities and structural support above. The same floor-to-floor height has been reserved for the PTT and the structures above under the current Proposed Scheme (point 2 in **Figure 3.1** refers).

Same Floor-to-floor Height for Typical Floors

- 3.3.8 Under both the Approved GBP Scheme and Proposed Scheme, the floor-to-floor height of the typical floors is 3.15m (point 3 in **Figure 3.1** refers).

3.4 Additional Planning Gains and Design Merits

- 3.4.1 The Proposed Scheme solely involves relocation of basement carpark to above-ground with the associated increase in building height, which is in line with the Government's latest policy on aboveground carpark. Nevertheless, the Applicant has devoted much effort to provide design merits in the Proposed Development despite a small site area and multiple site constraints.

3.4.2 NBAs and building separations (Appendix B refers):

- Along the western boundary, an NBA with a width of 2.4m has been provided. This NBA also complies with the requirement under lease (i.e. Pink Hatched Blue Area);
- Along the western boundary, an NBA with a width of 12m only for the level at, above or over 23mPD is required under lease (i.e. Pink Patched Black Area). Under the Proposed Scheme, the Applicant acts further and commits

a full-height building separation of about 12m to promote permeability. This building separation would also help to comply with the minimum 20% permeability requirement under SBDG;

- Along the southern boundary, an NBA with a width of about 1.3m has also been provided. This NBA also complies with the requirement under lease (i.e. Pink Stippled Black Area);
- Along the northern boundary, a strip of NBA with a width of about 1.2m along the boundary abutting Hoi Chu Road is provided. This NBA also complies with the requirement under lease (i.e. Pink Stippled Blue Area); and
- Along the eastern boundary, the Applicant commits another building separation with a width ranging from about 4m to 7.5m. Other than a minor structure for Genset Room, Sprinkler Control Valve Room and Fire Control Room to serve the PTT, this building setback could contribute to promote permeability along the interface with the adjacent Hoi Chu Road Playground. This setback would also help to comply with the requirements under SBDG³.

3.4.3 At-grade greenery: the Applicant has tried her best effort to incorporate street-level greenery to promote visual interest and to soften the building mass as visually perceived by the public. On top of the 20% greenery provision to be provided elsewhere in the Proposed Development (i.e. 2/F and 3/F under the Proposed Development), a street-level greenery (with a total area of about 50m²) is committed along the western boundary at the G/F (see G/F plan in **Appendix C**). The proposed G/F greenery will be in the form of both at-grade planters as well as vertical green. The Applicant has exhausted possible areas for provision of low-zone greenery, as no planter shall be installed in other roadside area to facilitate subsequent handover of PTT to relevant Government authorities.

3.4.4 Good building design features: to soften building bulk as perceived by pedestrians, the following building design features will be adopted:

- The G/F PTT will adopt minimal column design to facilitate penetration of air. The western and eastern sides of the PTT will also be uncovered to promote permeability;

³ According to PNAP APP-152, the requirement on minimum separation is 3m and mean width is 7.5m to achieve the required permeability. The minor structure for PTT can be disregarded due to its limited height, thus its existence does not affect compliance with PNAP APP-152.

- The carpark on 1/F and 2/F will not be fully enclosed but with openable voids to facilitate natural ventilation as well as visual permeability when viewing from Hoi Chu Road and from Light Rail Goodview Garden Stop; and
- The Applicant would explore various ways to improve the visual interests of the building façade at subsequent detailed design stage as far as practical. For example, a mixture of building materials such as multiple tones and textures will be considered. Façade will be articulated in contour to enrich built form. Such façade treatment can effectively soften the perceivable building mass as visually perceived in its surroundings.

3.5 Access, Circulation and Carparking Provision

3.5.1 The ingress and egress points of the Proposed Development are at Hoi Chu Road. Since the Proposed Scheme has the same number of flats as compared with the Approved GBP Scheme, the proposed internal carparking and servicing provision are largely the same. The details of such provision are summarized in **Table 3.2**.

Table 3.2 Provision of Internal Transport Facilities

	Approved GBP Scheme (A)	Proposed Scheme (B)	Difference (B) - (A)
Car Parking and Loading / Unloading Spaces			
• Residents	• 70	• 75 ⁽¹⁾	• +5
• Visitors	• 5	• 5	• Nil
• Motorcycle	• 7	• 7	• Nil
• Bicycles	• 55	• 55	• Nil
• Loading / Unloading Space (HGV)	• 1	• 1	• Nil

Remarks:

- (1) Under the Proposed Scheme, with 2 storeys of aboveground carpark, the number of carparking spaces allowed under lease can be optimized to serve future residents.

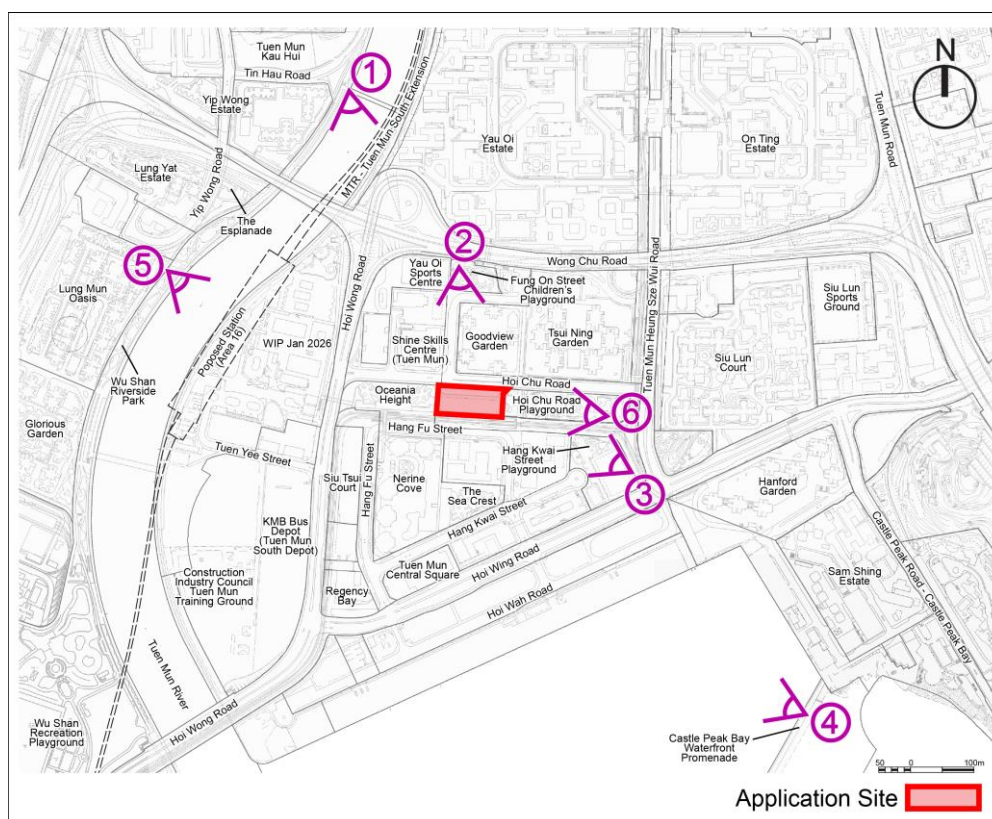
4 TECHNICAL CONSIDERATIONS

4.1 Government's Policy

4.1.1 Under the latest policy initiative, for minor relaxation of building height restriction due to the construction of not more than two levels of aboveground carpark, streamlined town planning procedure will be adopted. Applicant will only have to submit simple (i) visual appraisal and (ii) simple review of air ventilation impact if the site involves major breezeways.

4.2 Visual Appraisal

4.2.1 Acting under the policy initiative, a Visual Appraisal has been prepared to analyse the possible visual impact induced by the proposed increase of building height under the subject Proposed Scheme as compared against the maximum permissible building height under the OZP of not more than 100mPD. A total of 6 vantage points (VPs) have been selected to present the possible visual impact as viewing from different angles at a distance from short-to-long range.



Location of VPs

4.2.2 Photomontages reflecting the Proposed Scheme and Approved GBP Scheme have been prepared (see **Figures 4.1 – 4.6**). As the maximum permitted building height stipulated on OZP is 100mPD, only visual impact arising from the relaxation of building height above 100mPD will be assessed, i.e. the photomontages for the Proposed Scheme will be compared with the photomontages for the Approved GBP Scheme instead of existing condition for assessment purpose.

4.2.3 The planned A16 Station and its residential development is to the west of the Application Site. Its building bulk has been reflected in the photomontages wherever visible.

Selections of VPs

VP 1 – Footbridge Between Yip Wong Estate and Yau Oi Estate

4.2.4 This VP is about 475m away from the Application Site. It connects Yip Wong Estate and Yau Oi Estate and the two sides of Tuen Mun River Channel. This footbridge is often used by local residents to cross Tuen Mun River Channel.

VP 2 – Fung On Street Children's Playground

4.2.5 This VP is about 200m north to the Application Site. This children playground offers park amenities such as slides and climbs, thus is it mainly for children's active activities. As it is located right next to Yau Oi Sports Centre and surrounded by residential developments such as Goodview Garden, Yau Oi Estate, Tsui Ning Garden, etc. This playground has high footfall.

VP 3 – Hang Kwai Street Playground

4.2.6 Hang Kwai Street Playground is about 275m southeast to the Application Site. It offers a basketball court, football field and spectator's stand, thus attracts users participating in active sports.

VP 4 – Castle Peak Bay Waterfront Promenade

4.2.7 This VP is also located to the southeast of the Application Site, but with a farther distance, about 700m. It offers view towards Tuen Mun Typhoon Shelter and Castle Peak Bay. It is located close to Sam Shing Estate and famous beaches in the

district such as Castle Peak Beach, Kadoorie Beach, etc. The promenade is also a popular spot for jogging.

VP 5 – Promenade along Wu Shan Riverside Park

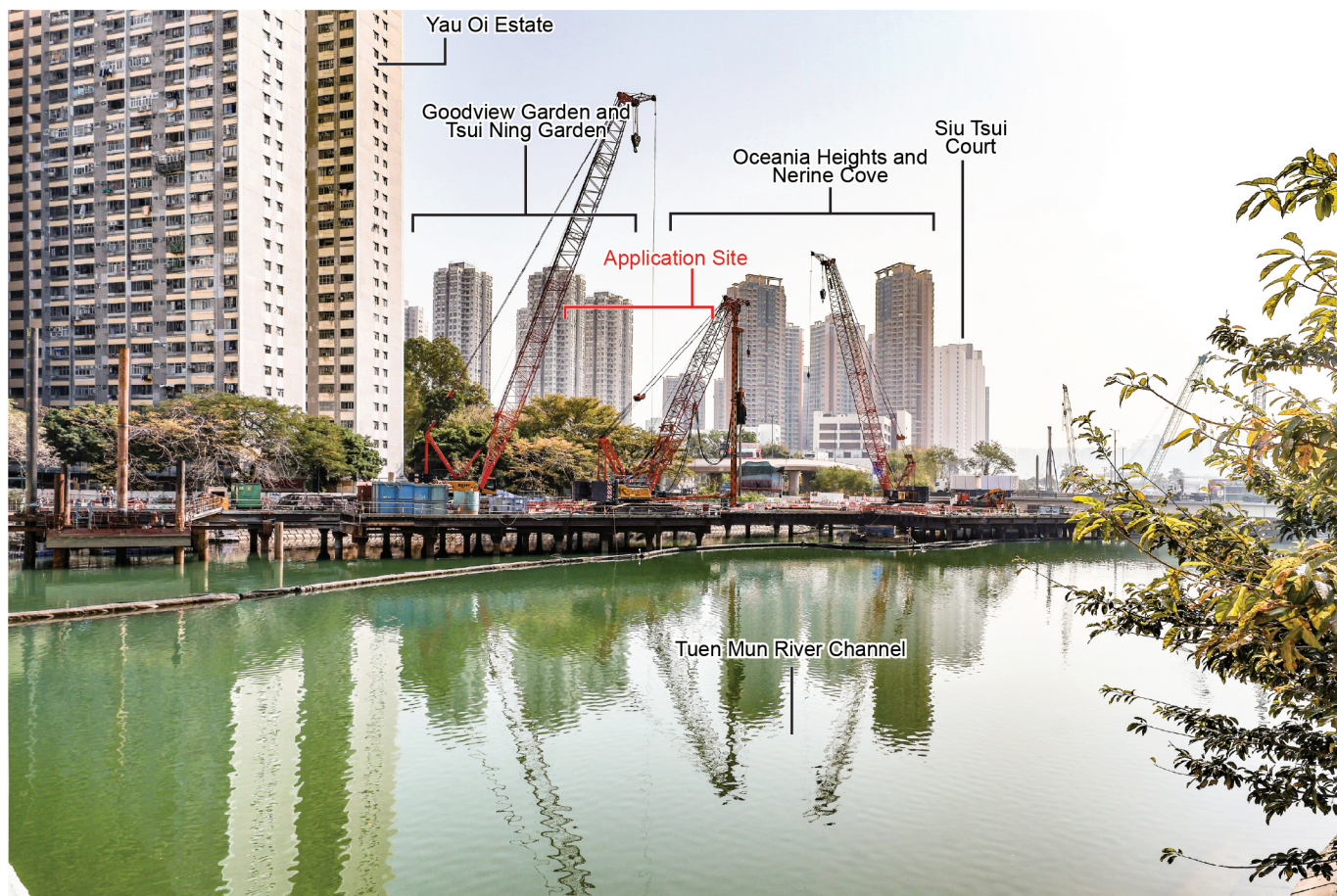
- 4.2.8 This VP is about 480m northwest to the Application Site. Located outside Lung Mun Oasis, it provides an overview of the developments on the opposite side of Tuen Mun River Chanel in Planning Area A16. The future A16 Station Development will be visible from this VP. Wu Shan Riverside Park is an important open space to the residents to the west of Tuen Mun River Channel, serving existing developments such as Lung Mun Oasis, Glorious Garden, Sun Tuen Mun Centre, etc. The promenade is connected with Wu Shan Recreation Playground. Wu Shan Recreation Playground together with Wu Shan Riverside Park together form a major open space belt in the area, serving all sorts of active and passive activities.

VP 6 – Hoi Chu Road Playground

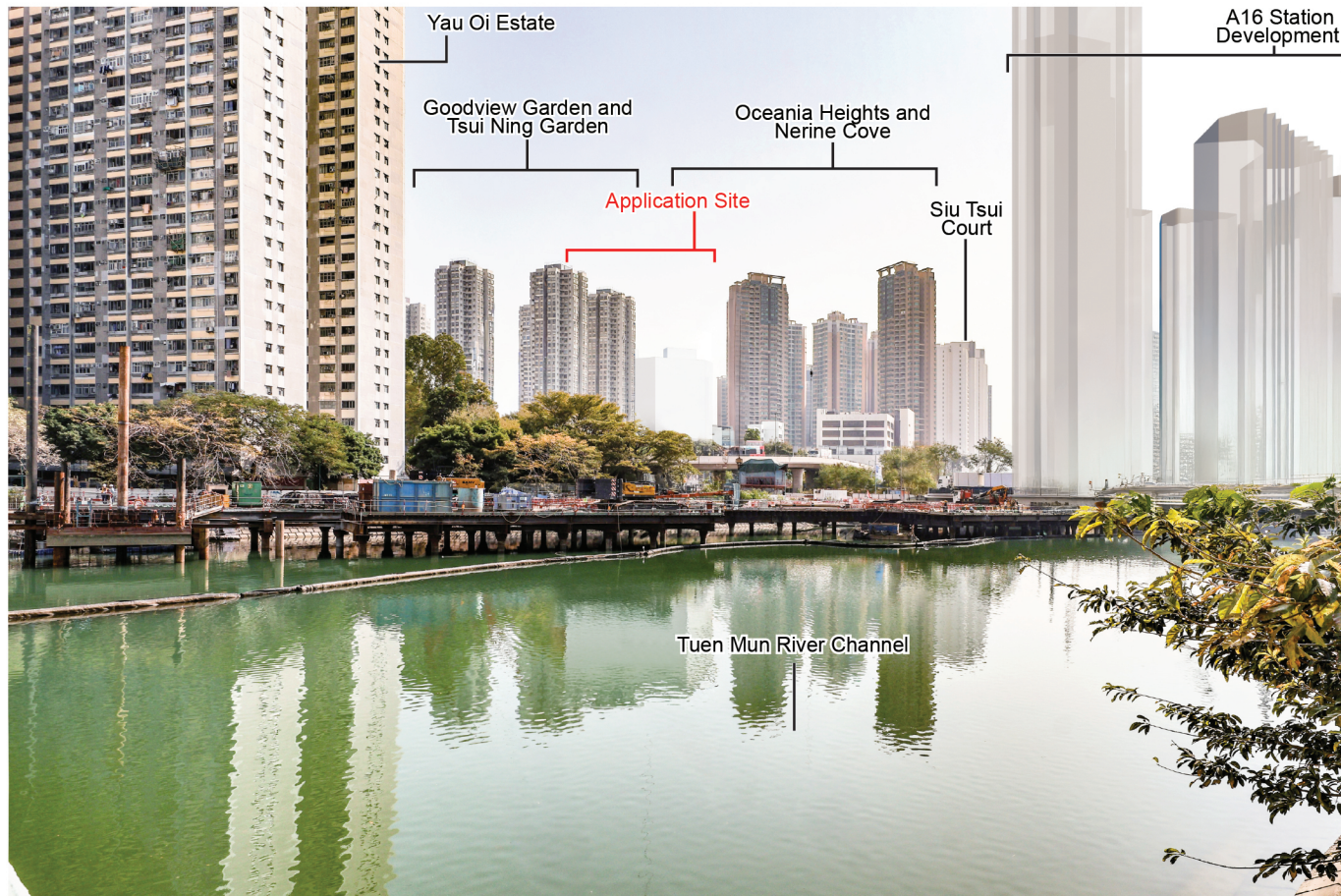
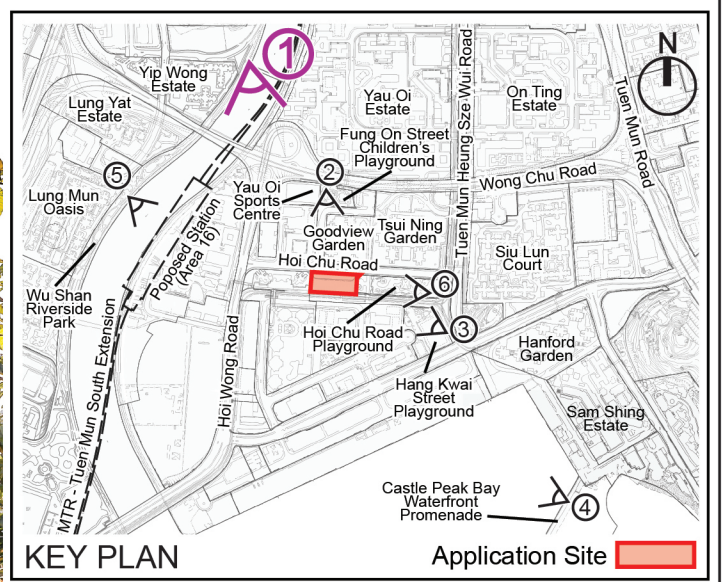
- 4.2.9 This VP is located to the immediate east of the Application Site, only about 180m away. It was selected because it is the closest open space to the Application Site. Basketball court, pavilions and park amenities are provided in this playground.

Discussion on Visual Impacts on VPs

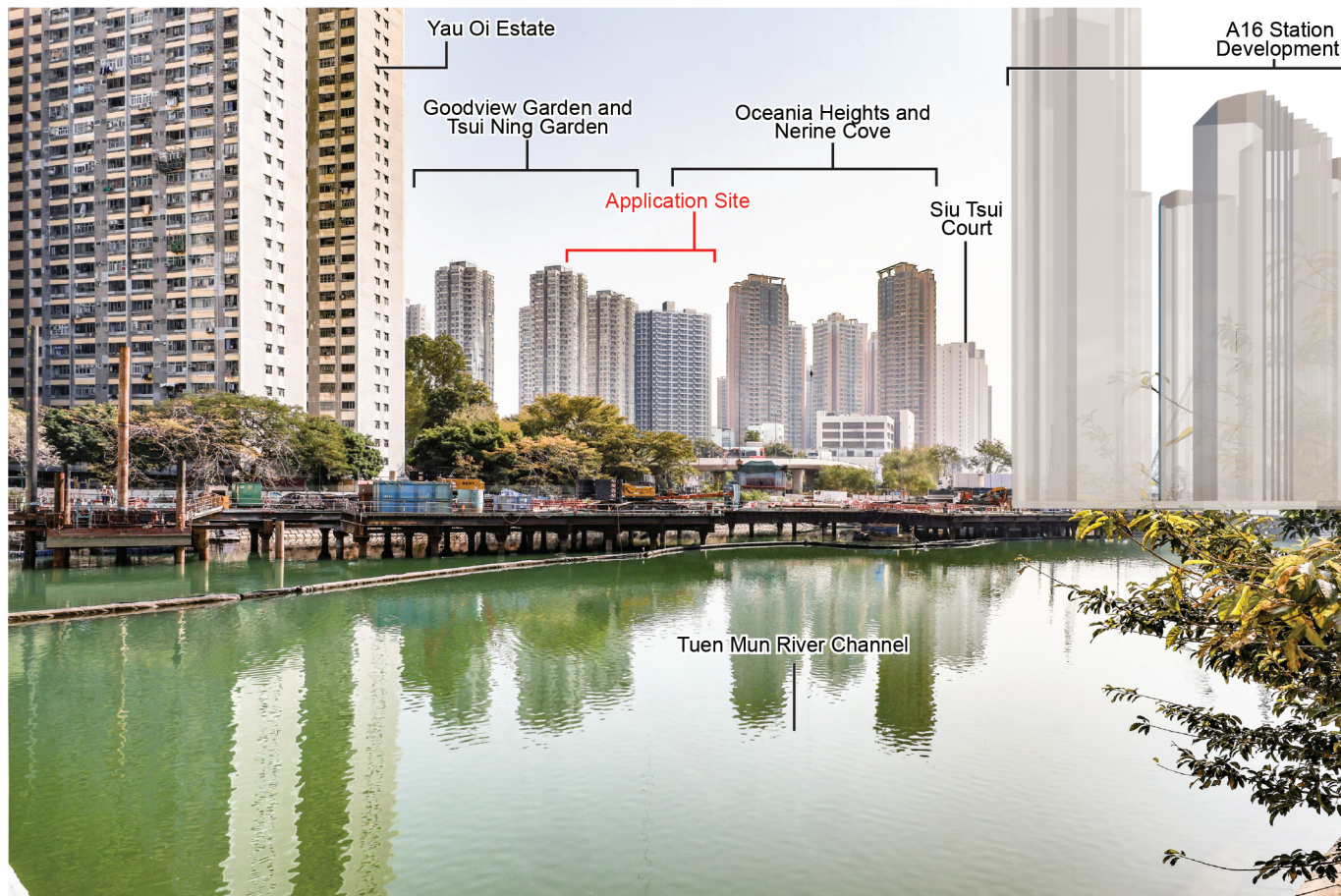
- 4.2.10 **VP 1 (Photomontages in Figure 4.1):** The Proposed Development is partially visible from this VP. Comparing the Proposed Scheme with the Approved GBP Scheme, the increase in building height by 9.2m only blocks a minor portion of the open sky view in between of the building clusters behind. Yet, all the visible visual elements under the Approved GBP Scheme remain visible in the Proposed Scheme. The magnitude of visual change is therefore slight. Sensitivity of viewers, which are mainly pedestrians, will be low due to their transient nature. The minor increase in building height at the Application Site is not likely to be noticed by the pedestrians on this footbridge. The more dominant residential developments as viewed from this VP are Yau Oi Estate and A16 Station Development. Furthermore, the Proposed Development with minor relaxation of building height is still not taller than the surrounding developments. Therefore, the overall visual impact at this VP is slight.



Existing Condition



Approved GBP Scheme



Proposed Scheme

4.2.11 **VP 2 (Photomontages in Figure 4.2):** The view from this VP only offers glimpsed view of the residential development at the Application Site. In the Approved GBP Scheme, it is largely blocked by Goodview Garden in the front. The existing trees in the playground also help to screen off view towards other residential developments in close vicinity of the Application Site. Upon completion of the Proposed Development, visual composition as viewed from this VP is largely the same as that under the Approved GBP scheme. Goodview Garden, Oceania Heights, Yau Oi Sports Centre and Fung On Street Children's Playground, i.e. the foreground of the existing view, remain visible to public viewers. The increase in building height only constitutes a minor degree of change of visible sky view through the trees at the playground, thus the minor increase in building height at the Application Site will not be eye-catching. This playground has high usage and is relatively close to the Application Site, therefore, the visual sensitivity of the public viewers would be high. Due to negligible visual change and high sensitivity of public viewers, the overall visual impact is slight.

4.2.12 **VP 3 (Photomontages in Figure 4.3):** The Proposed Development is partially visible from this VP. The existing trees outside the playground screens off view towards the podium levels of the proposed residential development. Under the Approved GBP Scheme where the building height is 100mPD, the residential block at the Application Site partially blocks Oceania Heights and ridgeline at the back. When the building height is increased to 109.2mPD under the Proposed Scheme, the visual composition would remain unchanged: Goodview Garden, Tsui Ning Garden, The Sea Crest, Nerine Cove and the secondary school remain visible; while part of the ridgeline would already be blocked by Oceania Heights and the OZP Compliant Scheme. Although building height is increased under the Proposed Scheme, the building bulk would be comparable with the developed urban context and it would be visually considered as an extension of the adjacent Goodview Garden and Oceania Heights. Given the Proposed Development is located at the centre of the view from this VP, the magnitude of visual change would be slight to moderate. Public viewers at this VP are likely to be football players or spectators. As this VP offers open view towards the Application Site, the visual sensitivity of the public viewers would be high. Overall, the visual impact at this VP is slight to moderate. Yet, as this area is already maturely developed as a high-density residential community, the overall visual impact is considered slightly adverse.



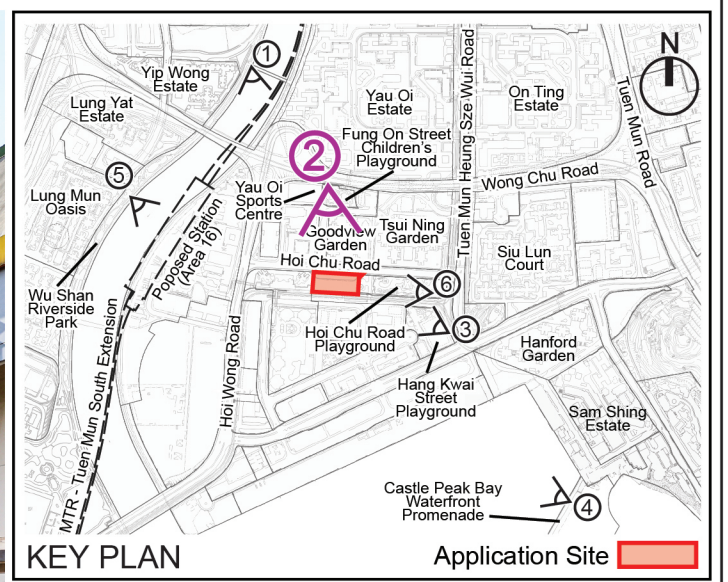
Existing Condition

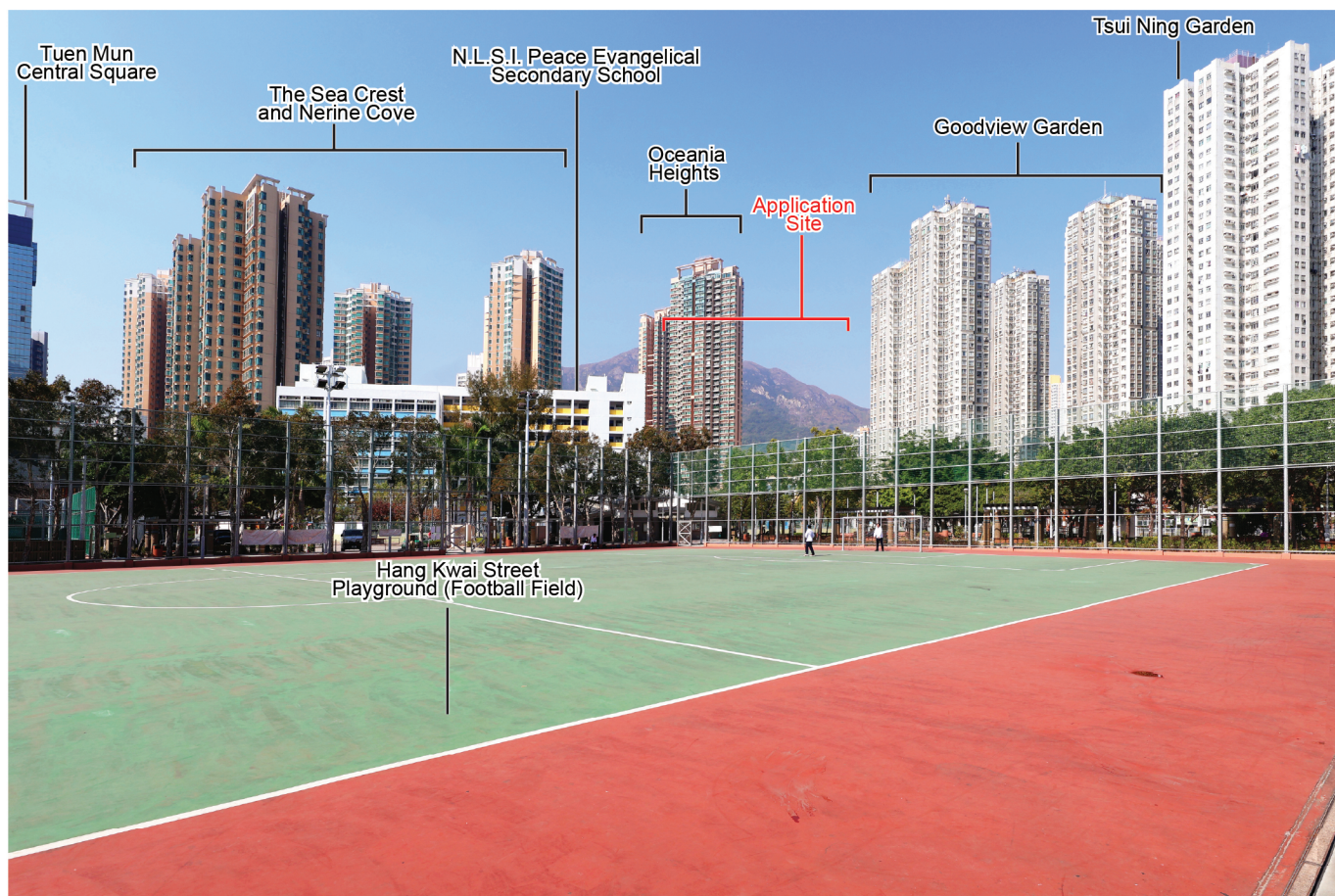


Approved GBP Scheme



Proposed Scheme





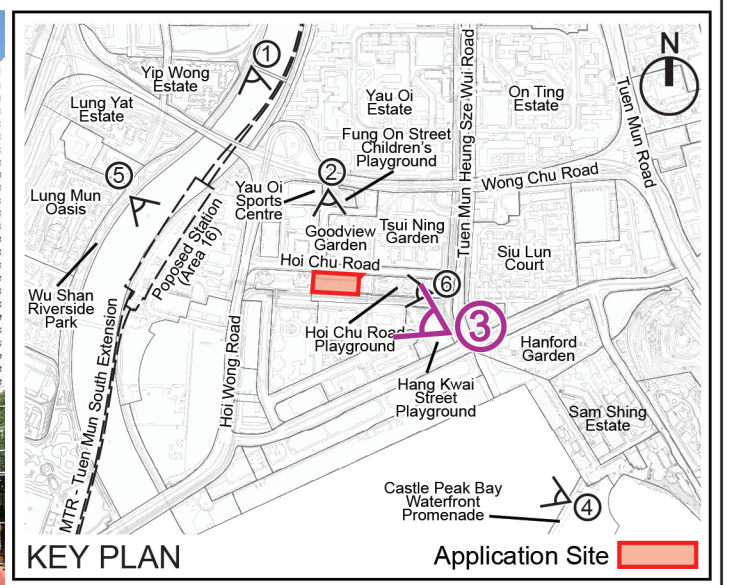
Existing Condition



Approved GBP Scheme



Proposed Scheme



- 4.2.13 **VP 4 (Photomontages in Figure 4.4):** The view from this VP offers panoramic view towards the residential developments in Area 16. Under both Approved GBP Scheme and Proposed Scheme, the Proposed Development is partially visible, blocked by Myloft in its front. Despite increase in building height, visual composition as viewed from this VP are largely the same under the two scenarios, only a tiny portion of sky view is blocked under the Proposed Scheme. Yet, due to the long distance of this VP from the Application Site, the change in building height can hardly be noticed, and the overall building height profile is maintained. Therefore, the magnitude of visual change is negligible. Public viewers at this VP are anticipated to be joggers or pedestrians coming to enjoy the view. Although their activity nature vary, their sensitivity are expected to be low, because of the long distance away from the Application Site. Therefore, the overall visual impact at this VP is rated as negligible / slight.
- 4.2.14 **VP 5 (Photomontages in Figure 4.5):** This VP offers panoramic view towards the opposite side of Tuen Mun River Channel. Under both Approved GBP Scheme and Proposed Scheme, the Proposed Development is not visible as it is blocked by A16 Station Development in its front. Hence, the magnitude of visual change is negligible. Visual sensitivity of public viewers at this VP is anticipated to be high because this VP offers open view towards the Application Site. Overall, as there is nil change to the visual elements after the proposed increase in building height, the overall visual impact at this VP is rated as negligible.
- 4.2.15 **VP 6 (Photomontages in Figure 4.6):** This short-range VP provides a close-up view towards the Application Site. Under both the Approved GBP Scheme and Proposed Scheme, the Proposed Development is partially visible, with the podium screened off by trees in the playground. Similar to the existing views occupied by Oceania Heights and the developments nearby, the Proposed Development would obstruct part of the ridgeline of Castle Peak and sky view at its back. Under Proposed Scheme, the Proposed Development would block slightly more of the open sky view above. The magnitude of visual change compared with the Approved GBP Scheme and the existing condition is slight. Public viewers at this VP are users of the playground participating in active and passive activities. As this VP offers direct view of the Application Site, the visual sensitivity of the public viewers is anticipated to be high. The overall visual impact at this VP is rated as slight to moderate.



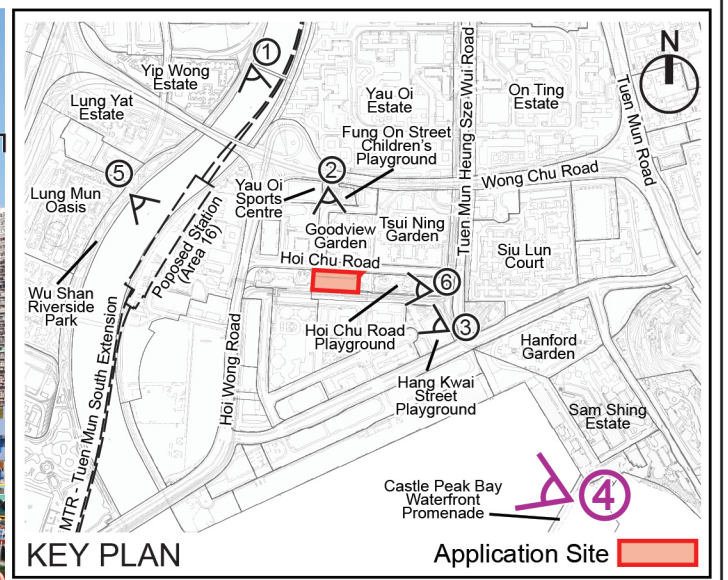
Existing Condition



Approved GBP Scheme

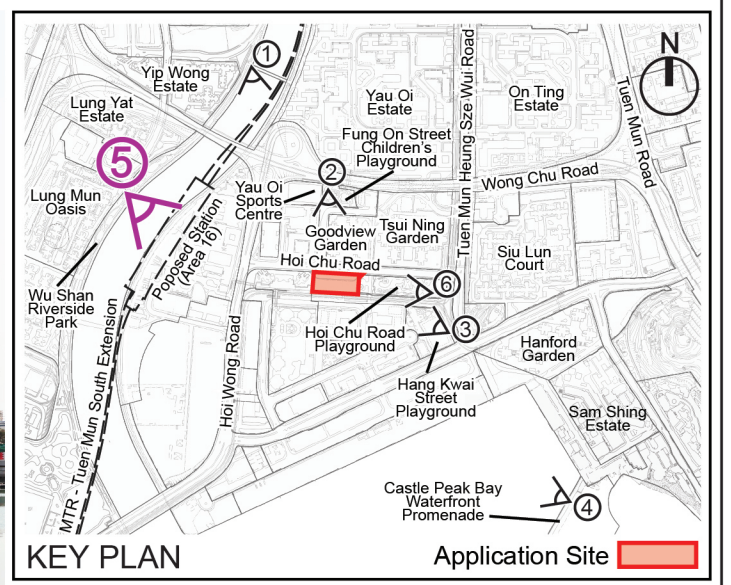


Proposed Scheme



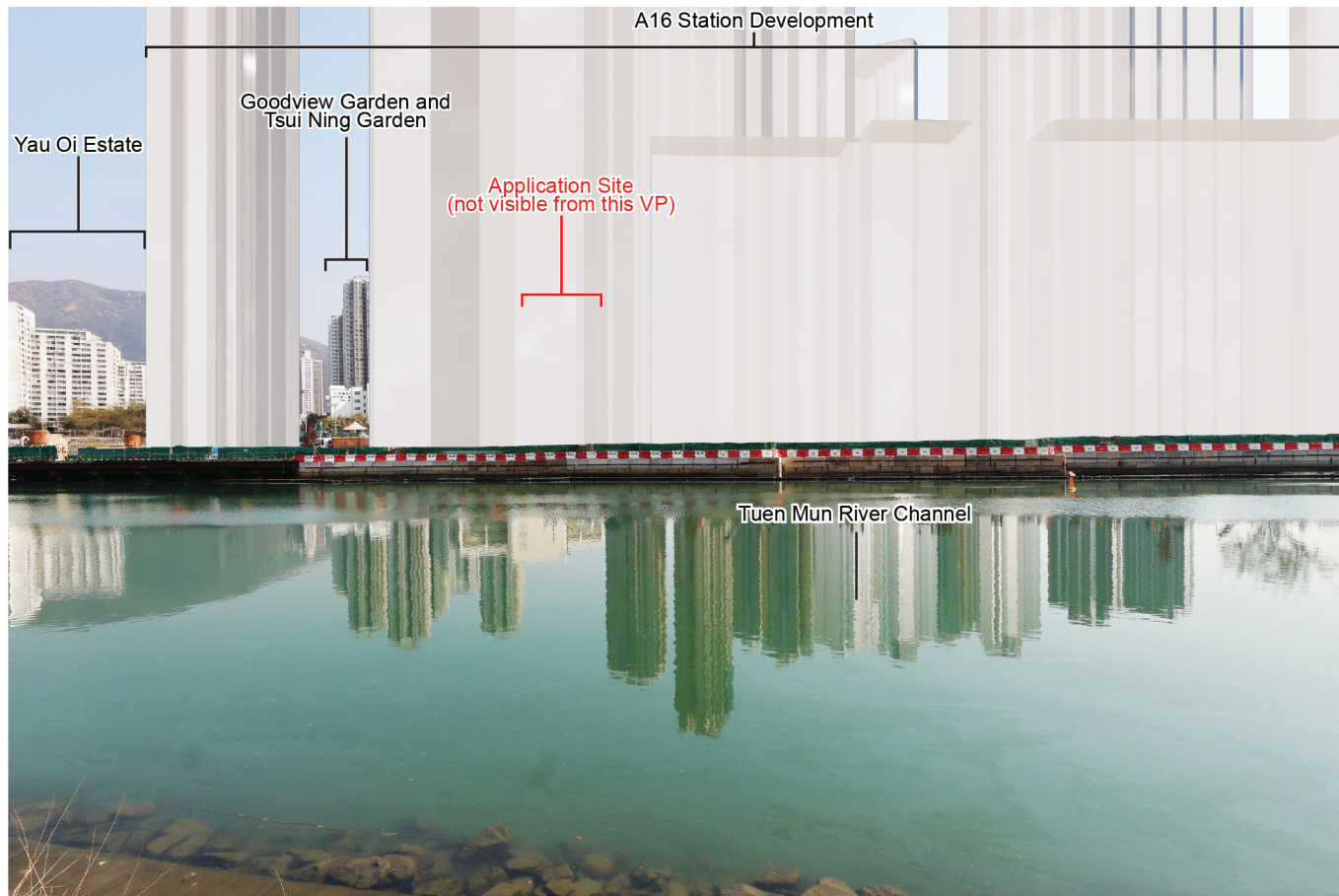


Existing Condition

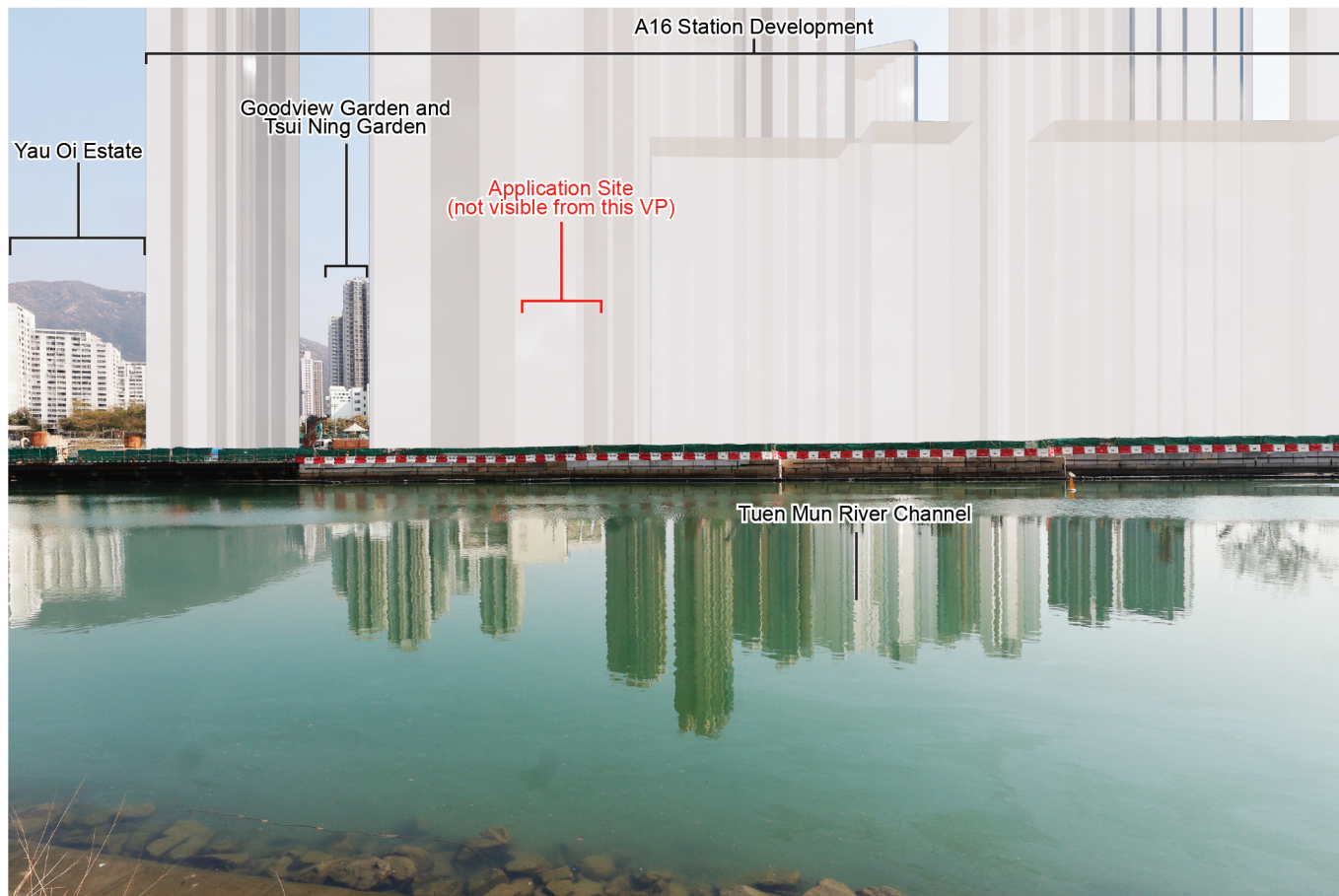


KEY PLAN

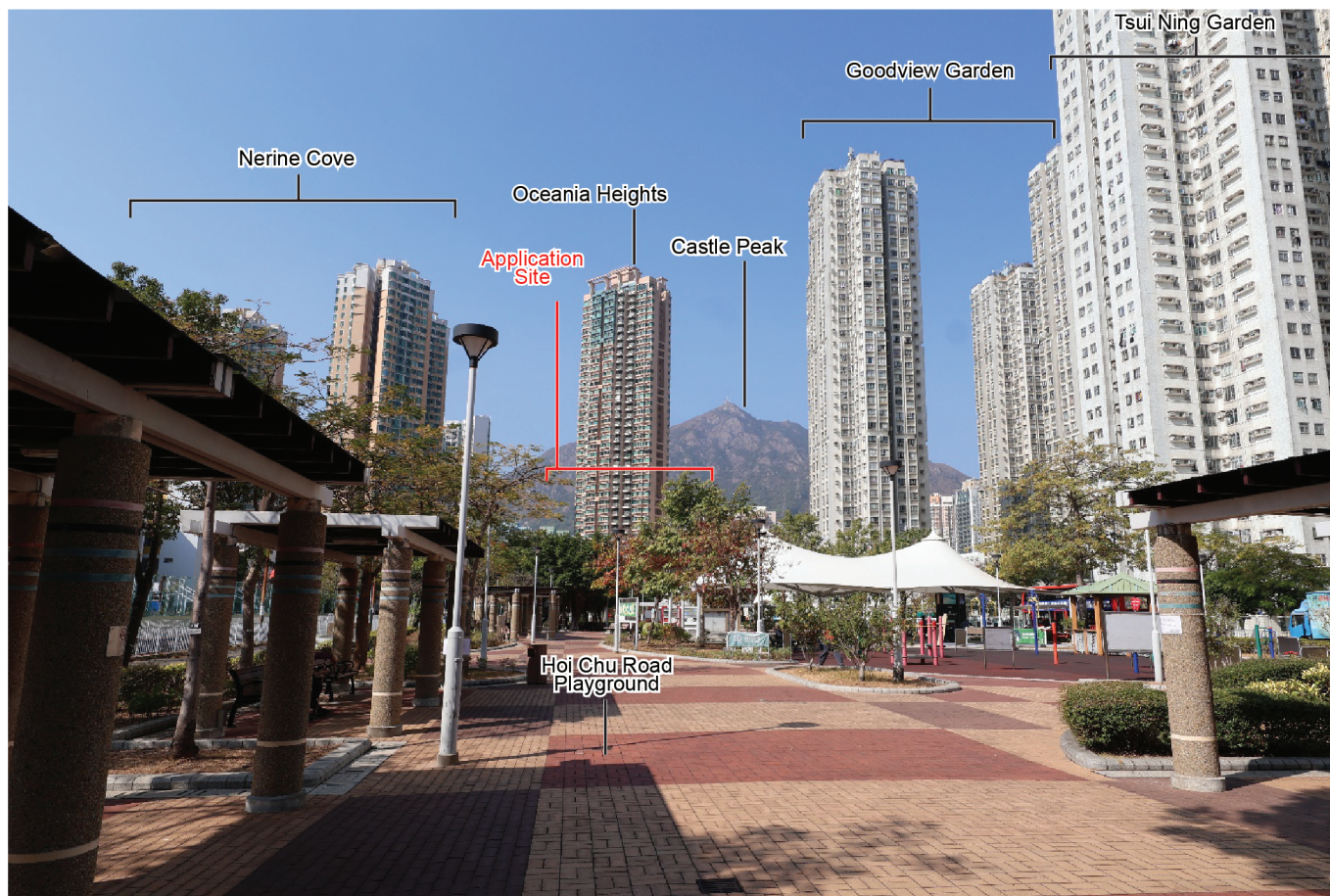
Application Site



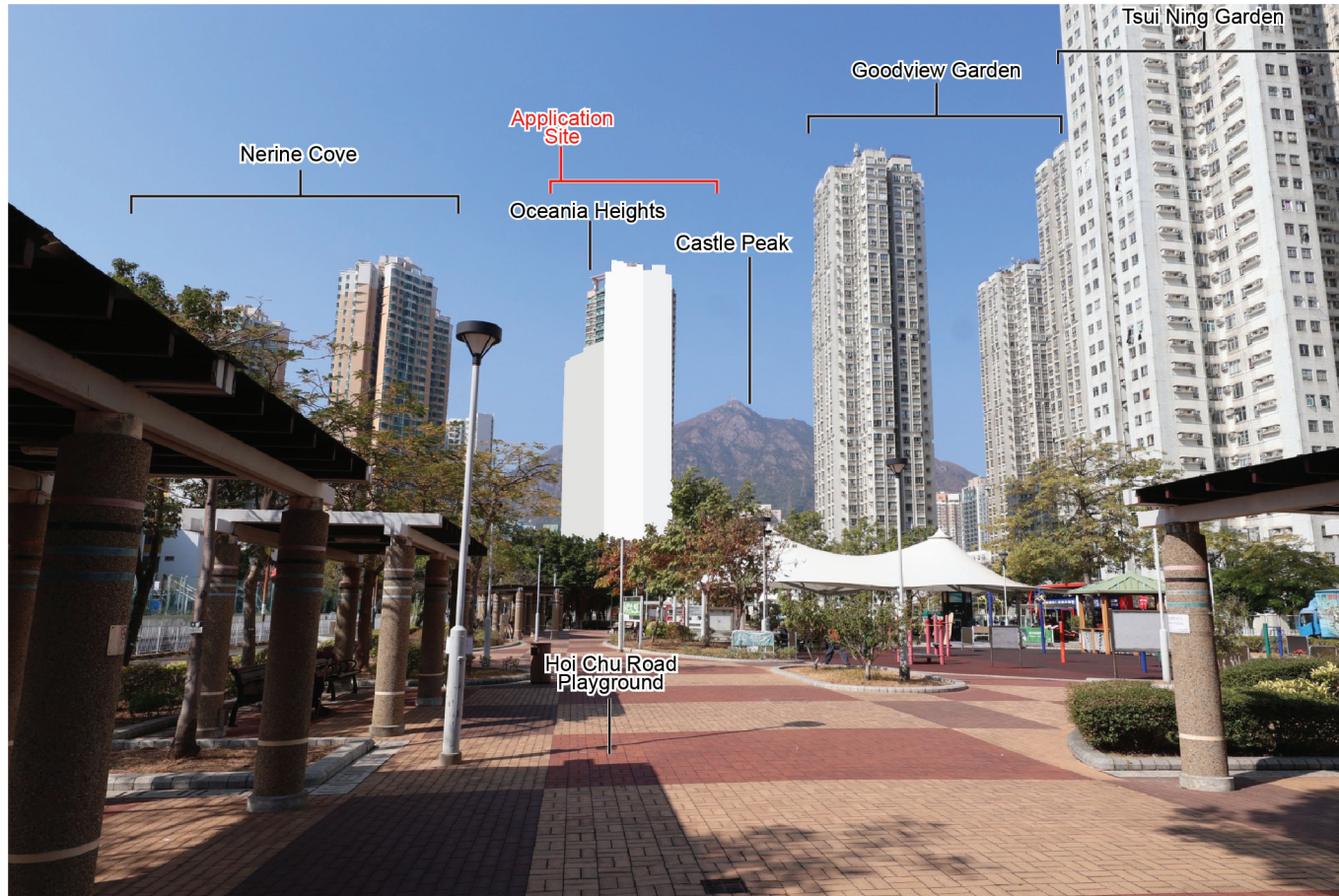
Approved GBP Scheme



Proposed Scheme



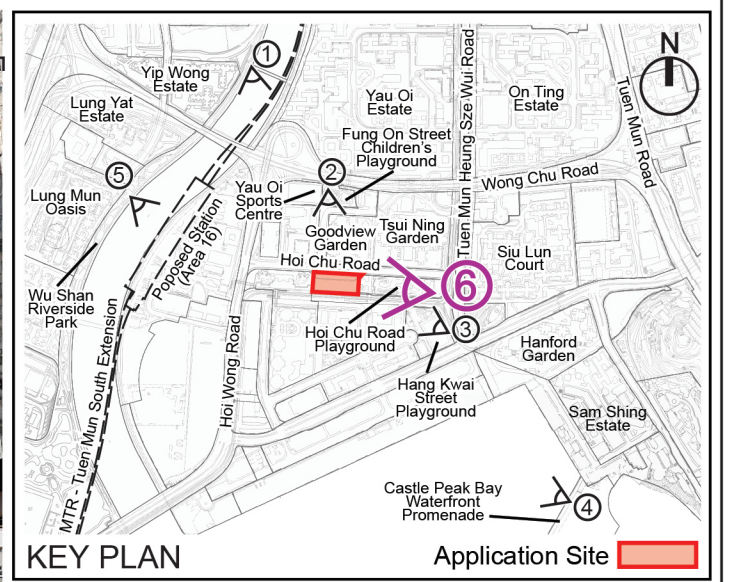
Existing Condition



Approved GBP Scheme



Proposed Scheme



KEY PLAN

Application Site

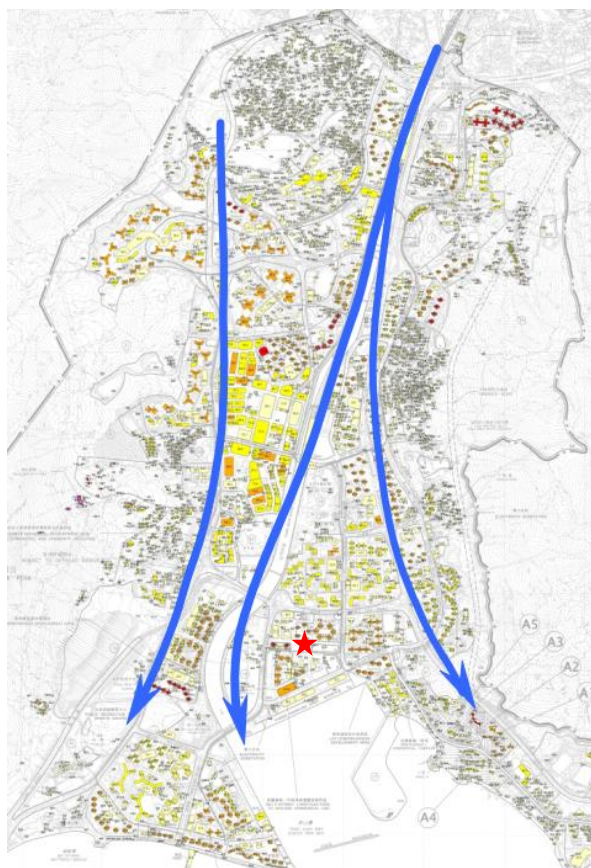
Conclusion

4.2.16 With consideration of the existing and planned surrounding context of the Application Site, it is concluded that the overall visual impact rating will range from negligible to slight to moderate. No adverse visual impacts are anticipated.

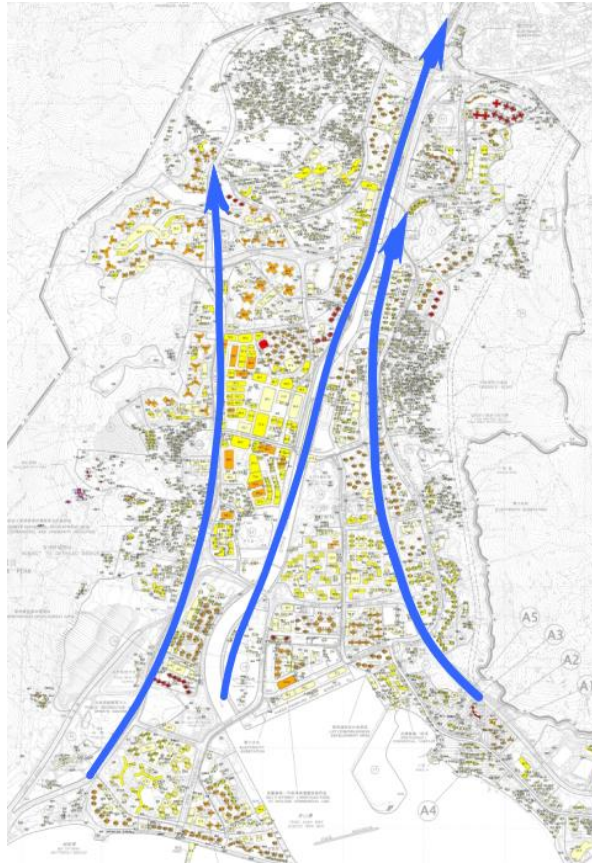
4.3 Air Ventilation Considerations

4.3.1 According to the Air Ventilation Assessment (Expert Evaluation) report for Tuen Mun New Town Area completed in March 2009 (which the same has been referenced when the OZP was amended in Year 2024 to rezone the Application Site from "Government, Institution or Community" zone to "R(A)29"), the Application Site does not fall within major breezeways under annual condition and summer condition (see below figures for reference, with location of the Application Site marked with a red star).

4.3.2 Therefore, a review of air ventilation impact for the subject planning application is not required as per latest enhanced GFA exemption arrangements for aboveground carpark.



Major Flow Paths under Annual Condition



Major Flow Paths under Summer Condition

4.3.3 Nevertheless, good design measures to enhance the ventilation performance have been adopted in the Proposed Scheme:-

1. Building separations and setbacks from southern, western, eastern and northern site boundaries to allow wind penetration in between Oceania Heights, Hoi Chu Road Playground and the Application Site; and
2. Permeable design of the G/F PTT and carpark floors on 1/F and 2/F.

4.3.4 Overall, the Application Site is not situated along any major breezeway. Additional design measures would also help promoting air ventilation performance of the Proposed Development.

4.4 Other Considerations

- 4.4.1 Since the Proposed Scheme conforms to the planning intention, land uses and plot ratio as set out in the OZP and maintains the same GFA and number of units as per the Approved GBP Scheme, the proposed minor relaxation of building height restriction from 100mPD to 109.2mPD will not induce additional traffic and engineering impacts. Given the Proposed Development is acceptable from visual perspective as detailed in **Section 4.2** and not anticipated to have adverse air ventilation impacts as explained in **Section 4.3**, the Proposed Scheme is technically feasible.

5 PLANNING JUSTIFICATIONS

5.1 Proposed Scheme is in Line with the Government's Latest Policy of Facilitating Provision of Aboveground Carpark

5.1.1 Major difference between the Proposed Scheme and Approved GBP Scheme is the relocation of the carpark from basement to 1/F and 2/F. Such refinement in scheme design is in line with the latest Government's policy to facilitate the provision of aboveground carpark in private development projects. Given that not more than 2 storeys of aboveground carpark proposed, and the Applicant has submitted the necessary technical assessment (visual appraisal under **Section 4.2**; air ventilation assessment not required), the subject planning application observes the relevant requirements for seeking planning permission for minor relaxation of building height restriction under the enhanced GFA exemption arrangements for aboveground carpark as promulgated in November 2025.

5.2 Magnitude of Increase in Building Height is Well Justified and Compatible with Surrounding Context

5.2.1 The building height restriction for the subject "R(A)29" zone stipulated on OZP is 100mPD. The current planning application seeks minor relaxation of the building height restriction from 100mPD to 109.2mPD at main roof. The 9.2m / 9.2% increase in building height is solely to accommodate the need for the 2 storeys of aboveground carpark. As detailed in **Section 3**, the current design of the aboveground carpark is the optimal design with minimised bulk and floor-to-floor height after taking into account site constraints and technical requirements.

5.2.2 The Proposed Development with building height at 109.2PD would be compatible with the existing residential developments in the close vicinity. Building heights of the nearby residential developments (**Figure 1.1**) are as follows:

- Oceania Heights: 129mPD
- Nerine Cove: 114mPD
- Goodview Garden: 106mPD
- Tsui Ning Garden: 102mPD
- The Sea Crest: 92mPD

5.2.3 The Proposed Development would not be taller than the adjacent Oceania Heights. Given the Application Site is located in a well-developed area mainly for residential use, the proposed building height is compatible with the surrounding development bulk.

5.3 Design Merits are Proposed

5.3.1 Despite the site constraints summarised in **Section 3**, the Applicant has strived to provide design merits, including:

- Provision of NBAs and building separations;
- Provision of at-grade greenery in form of planter and vertical green with total area of 50m²; and
- Good building design features to uplift visual and air permeability.

5.4 No Significant Technical Impacts

5.4.1 According to **Section 4** above, it is concluded that the overall visual impact induced by the Proposed Scheme due to the minor relaxation of building height of +9.2m / 9.2% as compared to the Approved GBP Scheme range from negligible to slight / moderate. The Proposed Development will not be out-of-context as the area has been well-developed into a residential community with building height over 100mPD in general.

5.4.2 In terms of air ventilation, as the Application Site does not fall within major breezeways, adverse air ventilation impacts are not anticipated.

5.4.3 Since the Proposed Scheme conforms to the planning intention, land use and plot ratio restriction as stipulated on the OZP, and most of the development parameters are the same as that of the Approved GBP Scheme, the proposed minor relaxation of building height restriction will not induce additional traffic and engineering impacts to its surrounding. The Proposed Scheme is therefore not anticipated to have any other technical impacts.

6 CONCLUSION

- 6.1 This planning application is submitted to the Board under S16 of the Ordinance for proposed minor relaxation of building height restriction from 100mPD to 109.2mPD for permitted 'Flat' use at the Application Site in "R(A)29" zone on the Approved Tuen Mun OZP No. S/TM/41.
- 6.2 The subject planning application is supported by the following justifications:
- The Proposed Development is in line with the Government's latest policy of facilitating provision of aboveground carpark;
 - The magnitude of increase in building height is well justified acting under its site and design constraints; and the Proposed Development is compatible with the surrounding context;
 - Design merits have been proposed; and
 - The Proposed Development will not induce adverse visual and other technical impacts.
- 6.3 In view of the above justifications, the Board is cordially invited to consider the subject planning application favourably.

Appendix A
Extract of the Extant OZP

RESIDENTIAL (GROUP A)

Column 1 Uses always permitted	Column 2 Uses that may be permitted with or without conditions on application to the Town Planning Board
Ambulance Depot Flat Government Use (not elsewhere specified) House Library Market Place of Recreation, Sports or Culture Public Clinic Public Transport Terminus or Station (excluding open-air terminus or station) Public Vehicle Park (excluding container vehicle) (on land designated "R(A)28" only) Religious Institution (Ancestral Hall only) (on land designated "R(A)28" only) Residential Institution School (in free-standing purpose-designed building only) Social Welfare Facility Utility Installation for Private Project	Commercial Bathhouse/Massage Establishment Eating Place Educational Institution Exhibition or Convention Hall Government Refuse Collection Point Hospital Hotel Institutional Use (not elsewhere specified) Office Petrol Filling Station Place of Entertainment Private Club Public Convenience Public Transport Terminus or Station (not elsewhere specified) Public Utility Installation Public Vehicle Park (excluding container vehicle) (not elsewhere specified) Religious Institution (not elsewhere specified) School (not elsewhere specified) Shop and Services (not elsewhere specified) Training Centre

(please see next page)

RESIDENTIAL (GROUP A) (cont'd)

Column 1 Uses always permitted	Column 2 Uses that may be permitted with or without conditions on application to the Town Planning Board
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In addition, the following uses are always permitted (a) on the lowest three floors of a building, taken to include basements; or (b) in the purpose-designed non-residential portion of an existing building, both excluding floors containing wholly or mainly car parking, loading/unloading bays and/or plant room :

- Eating Place
- Educational Institution
- Institutional Use (not elsewhere specified)
- Off-course Betting Centre
- Office
- Place of Entertainment
- Private Club
- Public Convenience
- Recyclable Collection Centre
- School
- Shop and Services
- Training Centre

Planning Intention

This zone is intended primarily for high-density residential developments. Commercial uses are always permitted on the lowest three floors of a building or in the purpose-designed non-residential portion of an existing building.

RESIDENTIAL (GROUP A) (cont'd)

Remarks

- (a) On land designated “Residential (Group A)” (“R(A)”), “R(A)1” and “R(A)24”, no new development for a domestic or non-domestic building shall exceed a maximum domestic plot ratio of 5 or a maximum non-domestic plot ratio of 9.5, as the case may be. For new development of a building that is partly domestic and partly non-domestic, the plot ratio for the domestic part of the building shall not exceed the product of the difference between the maximum non-domestic plot ratio of 9.5 and the actual non-domestic plot ratio proposed for the building and the maximum domestic plot ratio of 5 divided by the maximum non-domestic plot ratio of 9.5.
- (b) On land designated “R(A)22” and “R(A)23”, no new development for a domestic or non-domestic building shall exceed a maximum domestic plot ratio of 6 or a maximum non-domestic plot ratio of 9.5, as the case may be. For new development of a building that is partly domestic and partly non-domestic, the plot ratio for the domestic part of the building shall not exceed the product of the difference between the maximum non-domestic plot ratio of 9.5 and the actual non-domestic plot ratio proposed for the building and the maximum domestic plot ratio of 6 divided by the maximum non-domestic plot ratio of 9.5.
- (c) On land designated “R(A)27” and “R(A)30”, no new development for a domestic or non-domestic building shall exceed a maximum domestic plot ratio of 6 or a maximum non-domestic plot ratio of 9.5, as the case may be. For new development of a building that is partly domestic and partly non-domestic, the plot ratio for the domestic part of the building shall not exceed the product of the difference between the maximum non-domestic plot ratio of 9.5 and the actual non-domestic plot ratio proposed for the building and the maximum domestic plot ratio of 6 divided by the maximum non-domestic plot ratio of 9.5. GIC facilities of GFA not less than 500m² for “R(A)27” zone and not less than 315m² for “R(A)30” zone shall be provided, as required by the Government. Any floor space that is constructed or intended for use as GIC facilities shall be included for plot ratio calculation.
- (d) On land designated “R(A)”, “R(A)1”, “R(A)22”, “R(A)23”, “R(A)24”, “R(A)27” and “R(A)30”, no addition, alteration and/or modification to or redevelopment of an existing building shall result in a total development and/or redevelopment in excess of the relevant maximum domestic and/or non-domestic plot ratio(s) stated in paragraphs (a) to (c) above, or the domestic and/or non-domestic plot ratio(s) of the existing building, whichever is the greater, subject to, as applicable –
 - (i) the plot ratio(s) of the existing building shall apply only if any addition, alteration and/or modification to or redevelopment of an existing building is for the same type of building as the existing building, i.e. domestic, non-domestic, or partly domestic and partly non-domestic building; or
 - (ii) the maximum domestic and/or non-domestic plot ratio(s) stated in paragraphs (a) to (c) above shall apply if any addition, alteration and/or modification to or redevelopment of an existing building is not for the same type of building as the existing building, i.e. domestic, non-domestic, or partly domestic and partly non-domestic building.

(please see next page)

RESIDENTIAL (GROUP A) (cont'd)

Remarks (cont'd)

- (e) On land designated “R(A)2” to “R(A)21”, “R(A)25”, “R(A)26”, “R(A)28” and “R(A)29”, 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 the maximum GFA/plot ratio specified below, or the GFA/plot ratio of the existing building, whichever is the greater:

<u>Sub-area</u>	<u>Maximum GFA/plot ratio</u>
R(A)2	101,400m ² for domestic and 10,800m ² for non-domestic
R(A)3	18,160m ²
R(A)4	119,512m ² for domestic, 25,000m ² for non-domestic and 10,648m ² for public transport interchange
R(A)5	58,800m ² for domestic and 96,500m ² for non-domestic
R(A)6	14,650m ² for domestic and 8,030m ² for non-domestic
R(A)7	17,125m ² for domestic and 11,933m ² for non-domestic
R(A)8	19,892m ² for domestic and 7,163m ² for non-domestic
R(A)9	52,711m ² for domestic and 20,695m ² for non-domestic
R(A)10	17,560m ² for domestic and 7,006m ² for non-domestic
R(A)11	53,400m ² for domestic and 13,030m ² for non-domestic
R(A)12	70,380m ² for domestic and 2,750m ² for non-domestic
R(A)13	73,842m ² for domestic and 1,718m ² for non-domestic
R(A)14	245,700m ² for domestic and 2,250m ² for non-domestic
R(A)15	178,930m ² for domestic and 3,886m ² for non-domestic
R(A)16	155,908m ² for domestic and 7,770m ² for non-domestic
R(A)17	116,064m ² for domestic
R(A)18	129,540m ² for domestic and 4,467m ² for non-domestic
R(A)19	54,395m ² for domestic and 5,750m ² for non-domestic
R(A)20	235,815m ² for domestic and 7,365m ² for non-domestic
R(A)21	Maximum domestic plot ratio of 6 and maximum non-domestic plot ratio of 2
R(A)25	Maximum domestic plot ratio of 5 and maximum non-domestic plot ratio of 0.4

(please see next page)

RESIDENTIAL (GROUP A) (cont'd)

Remarks (cont'd)

R(A)26 & Maximum plot ratio of 6.5
R(A)28

R(A)29 Maximum plot ratio of 6

- (f) 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 the maximum building height in terms of mPD as stipulated on the Plan, or the height of the existing building, whichever is the greater.
- (g) On land designated “R(A)1”, a maximum building height of 100mPD would be permitted for sites with an area of 400m² or more.
- (h) In determining the maximum plot ratio for the purposes of paragraphs (a) to (e) above, the area of any part of the site that is occupied or intended to be occupied by free-standing purpose-designed buildings (including both developed on ground and on podium level) solely for accommodating GIC facilities including school(s) as may be required by the Government shall be deducted from calculation of the site area.
- (i) In determining the relevant maximum non-domestic GFA on land designated “R(A)20” for the purposes of paragraph (e) above, any floor space that is constructed or intended for use solely as free-standing purpose-designed primary school and secondary school (including both developed on ground and on podium level) shall not be included for calculation.
- (j) In determining the maximum plot ratio on land designated “R(A)28” for the purposes of paragraph (e) above, any floor space that is constructed or intended for use solely as public vehicle parks, public transport facilities and GIC facilities, as required by the Government, may be disregarded.
- (k) In determining the maximum plot ratio on land designated “R(A)29” for the purposes of paragraph (e) above, any floor space that is constructed or intended for use solely as public transport facilities and GIC facilities, as required by the Government, may be disregarded.
- (l) In determining the maximum plot ratio/GFA for the purposes of paragraphs (a) to (e) above, any floor space that is constructed or intended for use solely as car park, loading/unloading bay, plant room and caretaker’s office, or caretaker’s quarters and recreational facilities for the use and benefit of all the owners or occupiers of the domestic building or domestic part of the building, provided such uses and facilities are ancillary and directly related to the development or redevelopment, may be disregarded.
- (m) Where the permitted plot ratio as defined in Building (Planning) Regulations is permitted to be exceeded in circumstances as set out in Regulation 22(1) or (2) of the said Regulations, the plot ratio/GFA for the building on land to which paragraphs (a) to (e) above applies may be increased by the additional plot ratio by which the permitted plot ratio is permitted to be

(please see next page)

RESIDENTIAL (GROUP A) (cont'd)

Remarks (cont'd)

exceeded under and in accordance with the said Regulation 22(1) or (2), notwithstanding that the relevant maximum plot ratio/GFA specified in paragraphs (a) to (e) above may thereby be exceeded.

- (n) Based on the individual merits of a development or redevelopment proposal, minor relaxation of the plot ratio/GFA/building height restrictions stated in paragraphs (a) to (f) above may be considered by the Town Planning Board on application under section 16 of the Town Planning Ordinance.
- (o) Under exceptional circumstances, for developments and/or redevelopments, minor relaxation of the non-building area restrictions as shown on the Plan may be considered by the Town Planning Board on application under section 16 of the Town Planning Ordinance.

Zoning	Maximum Domestic GFA (m ²)	Maximum Non-domestic GFA (m ²)
“R(A)4”	119,512	25,000
“R(A)5”	58,800	96,500
“R(A)6”	14,650	8,030
“R(A)7”	17,125	11,933
“R(A)8”	19,892	7,163
“R(A)9”	52,711	20,695
“R(A)10”	17,560	7,006
“R(A)11”	53,400	13,030

- 9.3.8 On land designated “R(A)4”, the GFA of the public transport interchange (PTI) as required by the Government, i.e. an area of not more than 10,648m², is also stipulated in the Notes.
- 9.3.9 The nine sites occupied by existing HOS/PSPS developments, i.e. Prime View Garden, Siu On Court, Siu Lun Court, Glorious Garden, Melody Garden, Siu Shan Court, Siu Hei Court, Chi Lok Fa Yuen and Siu Hong Court are zoned “R(A)12” to “R(A)20” respectively. They are subject to the maximum GFA restrictions as stipulated in the Notes of the Plan or the GFA of the existing building, whichever is the greater.

Zoning	Maximum Domestic GFA (m ²)	Maximum Non-domestic GFA (m ²)
“R(A)12”	70,380	2,750
“R(A)13”	73,842	1,718
“R(A)14”	245,700	2,250
“R(A)15”	178,930	3,886
“R(A)16”	155,908	7,770
“R(A)17”	116,064	-
“R(A)18”	129,540	4,467
“R(A)19”	54,395	5,750
“R(A)20”	235,815	7,365

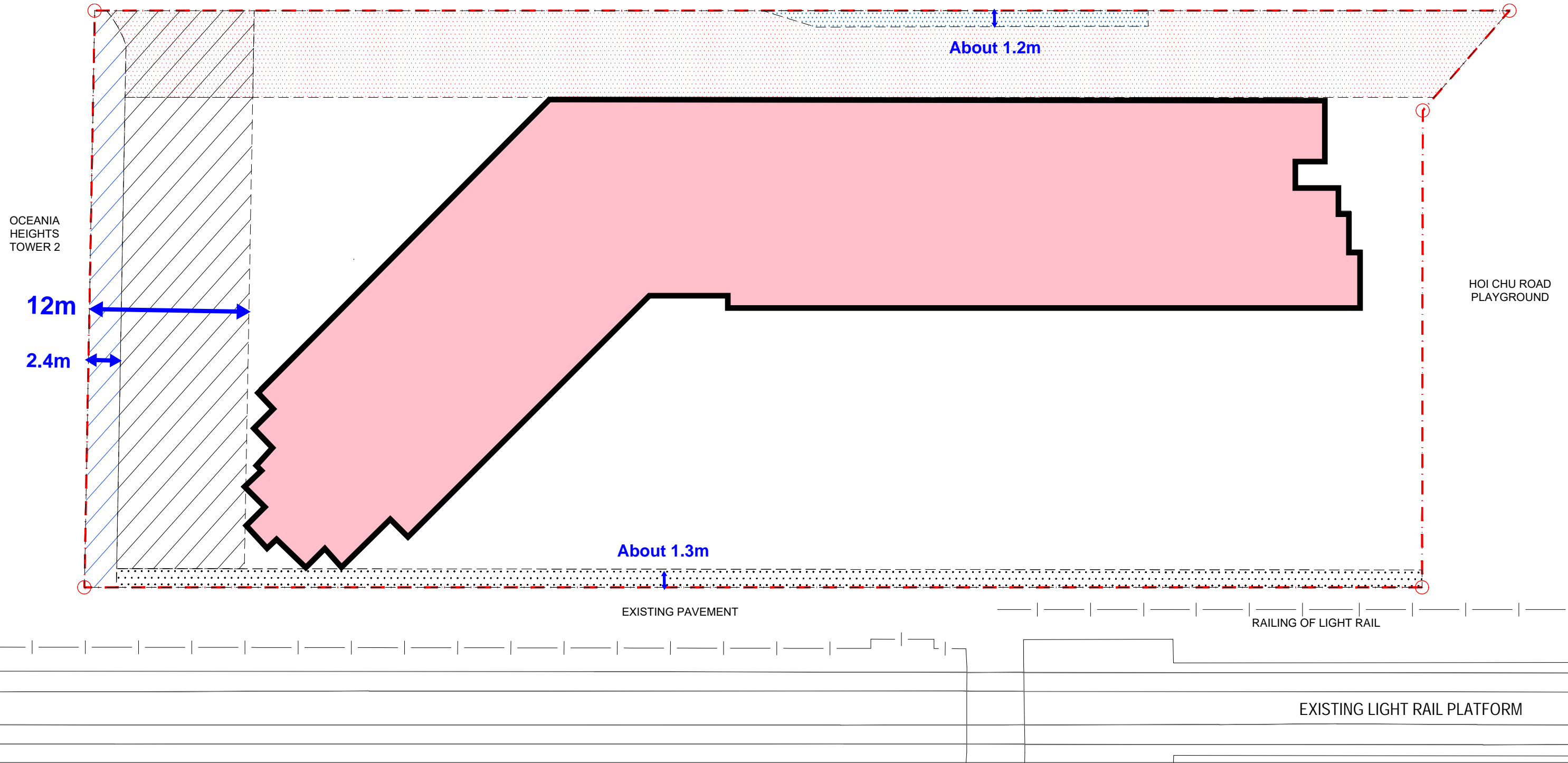
- 9.3.10 The “R(A)29” zone to the northwest of Light Rail Transit Goodview Garden Station in Area 16 is intended for private residential development, which is subject to a maximum plot ratio of 6, or the plot ratio of the existing building, whichever is the greater. A public transport terminus and GIC facilities shall be provided, as required by the Government. Opportunities for maximising the buffer distance between the residential tower of the proposed development at the site and the residential tower of Oceania Heights should be explored.

- 9.3.11 For the “R(A)30” zone, opportunities for landscape design sensitive to the neighbouring habitat in the adjacent “Green Belt” zone should be further explored.
- 9.3.12 In the circumstances set out in Regulation 22 of the Building (Planning) Regulations, the maximum plot ratios/GFAs specified in the Notes of the

Appendix B
Plans Illustrating Site Constraints

LEGEND:

- RESIDENTIAL
- PINK HATCHED BLACK AREA (NON-BUILDING ABOVE LEVEL OF 23 METERS)
- PINK HATCHED BLUE AREA (NON-BUILDING AREA)
- PINK STIPPLED BLACK AREA (NON-BUILDING AREA)
- PINK STIPPLED BLUE AREA (NON-BUILDING AREA)
- PINK STIPPLED RED AREA (AIR SENSITIVE ZONE)



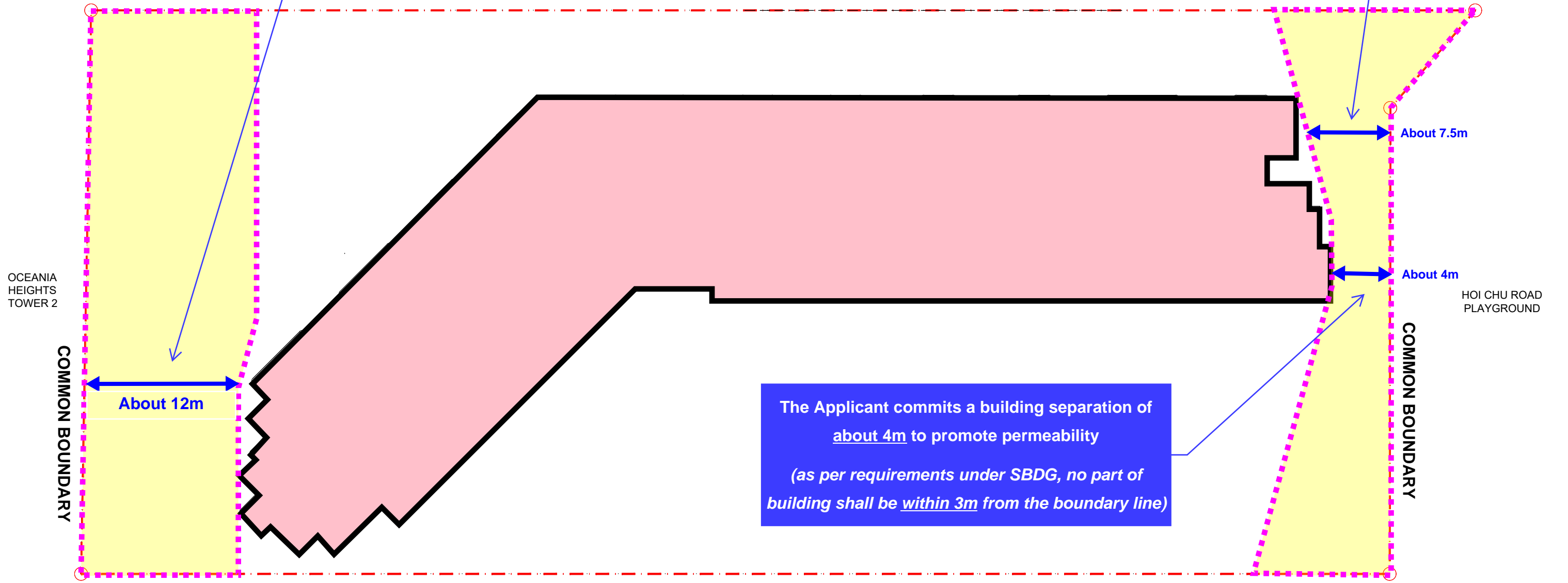
NON-BUILDING AREA & AIR SENSITIVE ZONE UNDER LEASE

LEGEND:

RESIDENTIAL

The Applicant commits a full-height building separation of about 12m to promote permeability. This would also help to comply with the 20% permeability requirement under SBDG.

Mean width of min. 7.5m separation to comply with requirements under SBDG, which limits the building footprint.



The Applicant commits a building separation of about 4m to promote permeability (as per requirements under SBDG, no part of building shall be within 3m from the boundary line)

EXISTING PAVEMENT

COMMON BOUNDARY

RAILING OF LIGHT RAIL

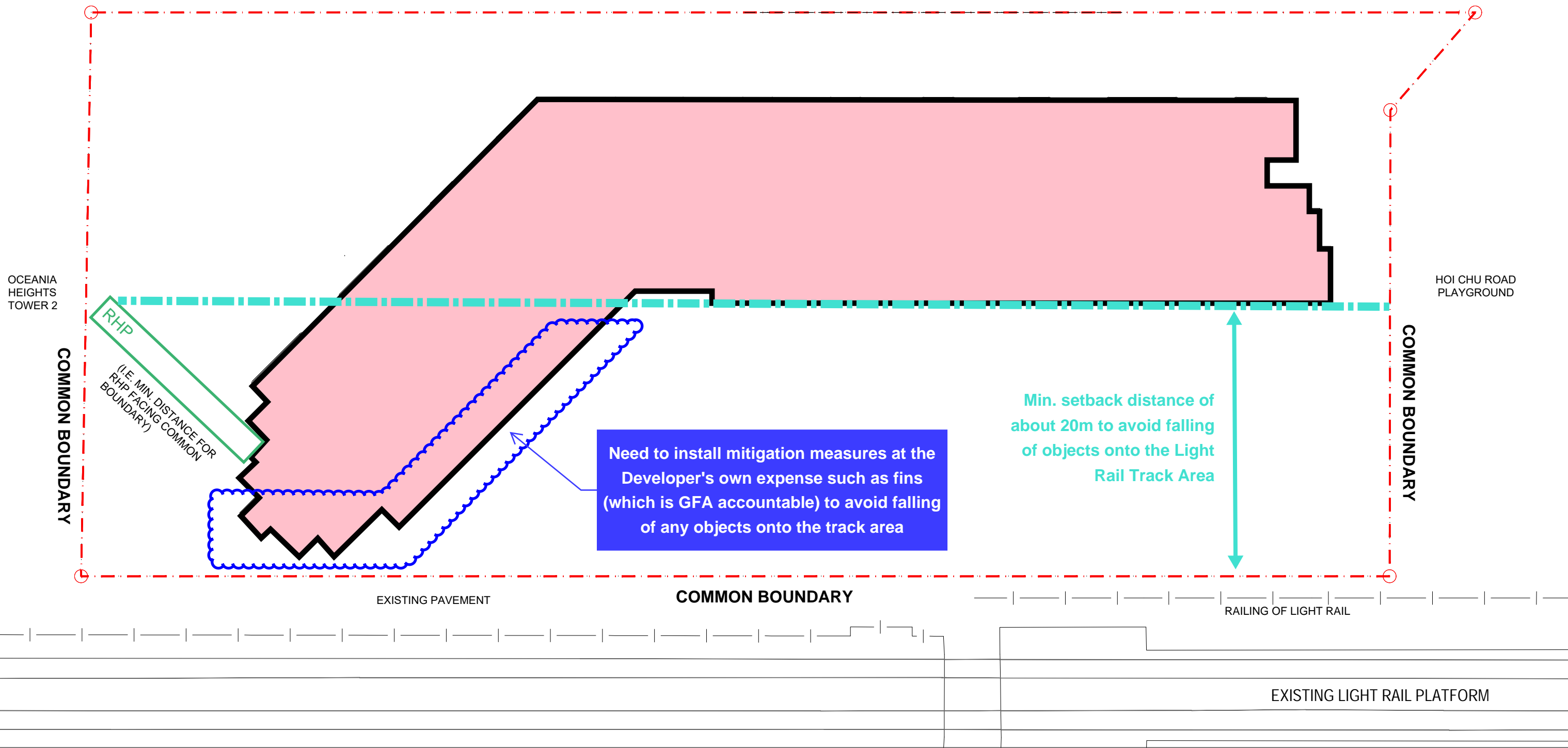
EXISTING LIGHT RAIL PLATFORM

BUILDING SEPARATIONS

LEGEND:

RESIDENTIAL

RECTANGULAR HORIZONTAL PLANE (RHP) FOR PRESCRIBED WINDOW



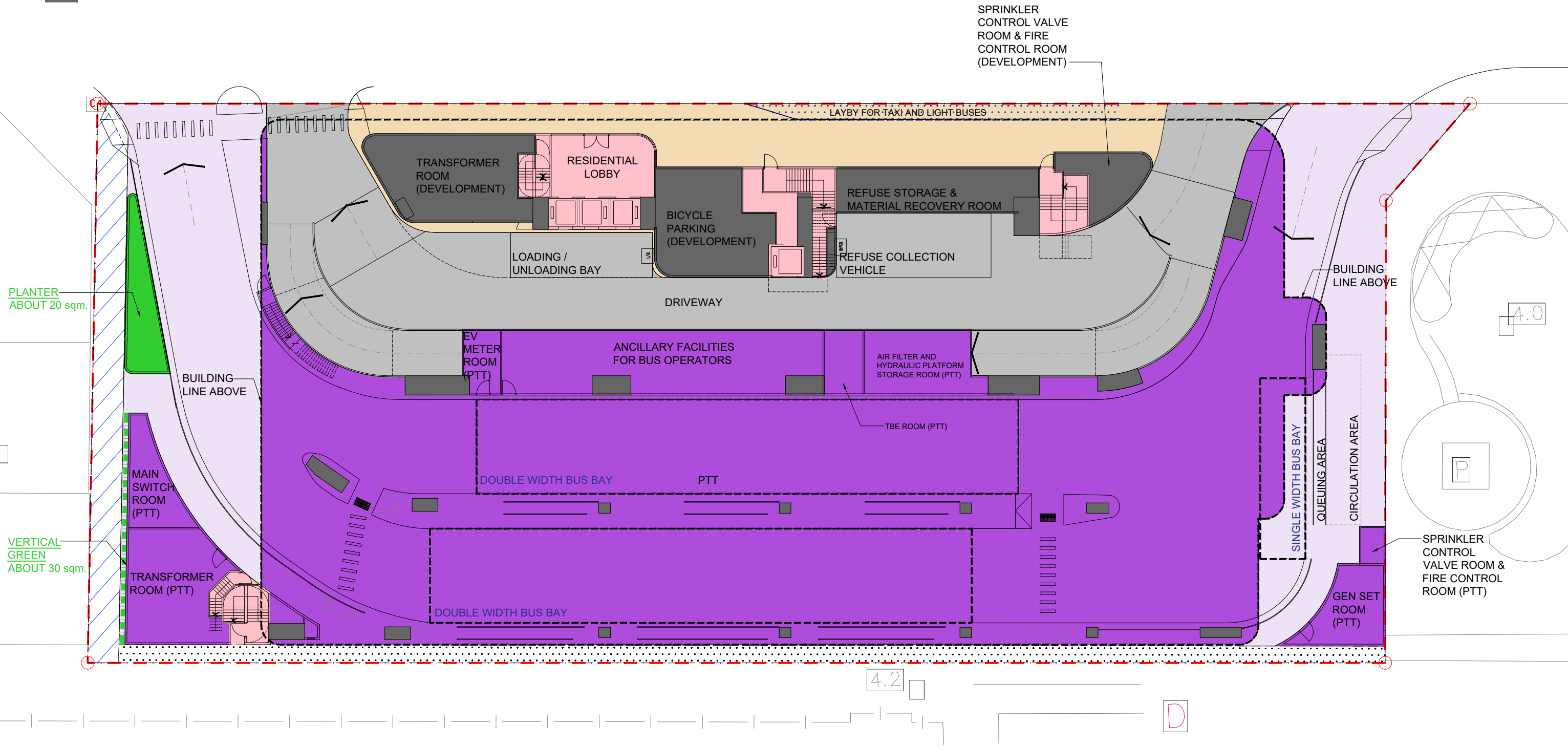
DESIGN CONSTRAINTS OF TOWER FOOTPRINT

Appendix C

Layout Plans of the Proposed Scheme

LEGEND:

- GREENERY
- DECK / FOOTPATH
- PINK HATCHED BLUE AREA (NON-BUILDING AREA)
- LOBBY
- UNCOVERED PTT AREA
- PINK STIPPLED BLACK AREA (NON-BUILDING AREA)
- CARPARK / DRIVEWAY
- COVERED PTT AREA
- PINK STIPPLED BLUE AREA (NON-BUILDING AREA)
- E&M



T.M.T.L. 569, Hoi Chu Road, Tuen Mun, N.T. Proposed Residential Development
 Section 16 - Application for Minor Height Relaxation

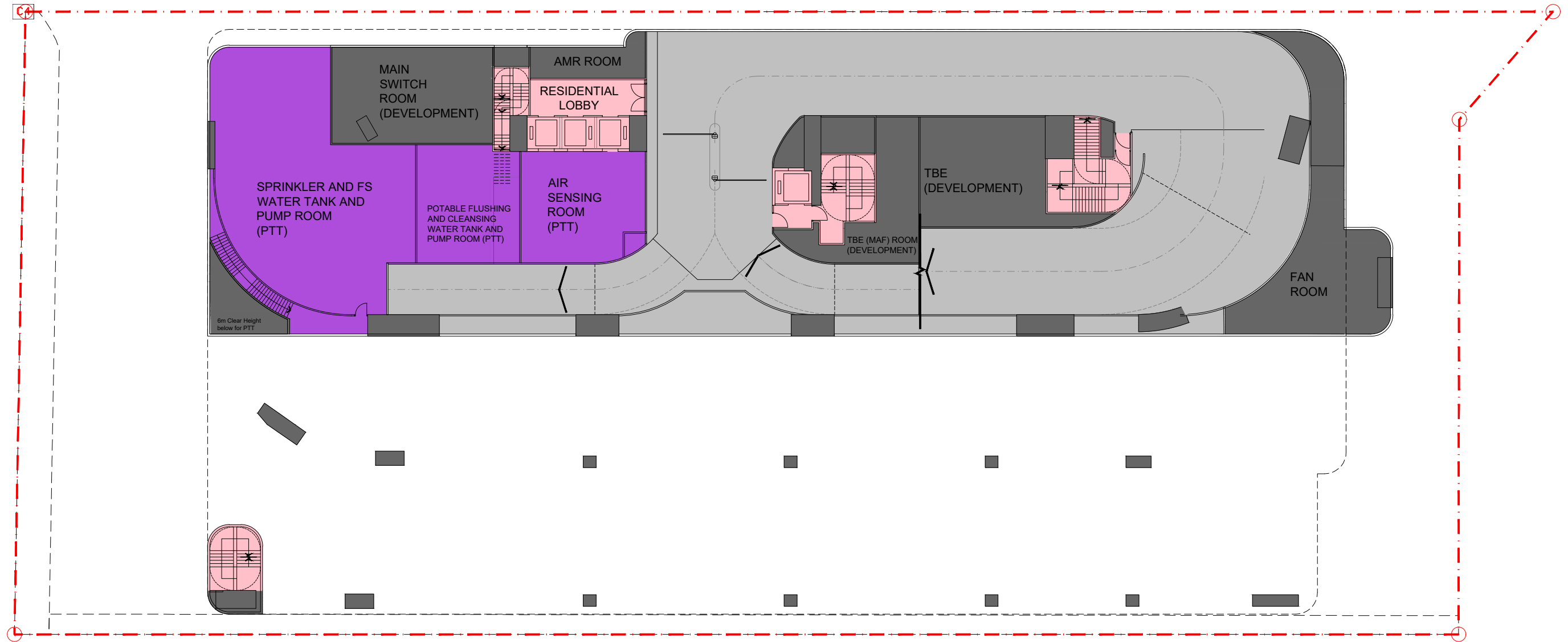
G/F (+3.80 mPD)

4 MAY 2026
 1:300

LWK
+PARTNERS

LEGEND:

- LOBBY
- CARPARK / DRIVEWAY
- E&M
- COVERED PTT AREA



T.M.T.L. 569, Hoi Chu Road, Tuen Mun, N.T. Proposed Residential Development
Section 16 - Application for Minor Height Relaxation

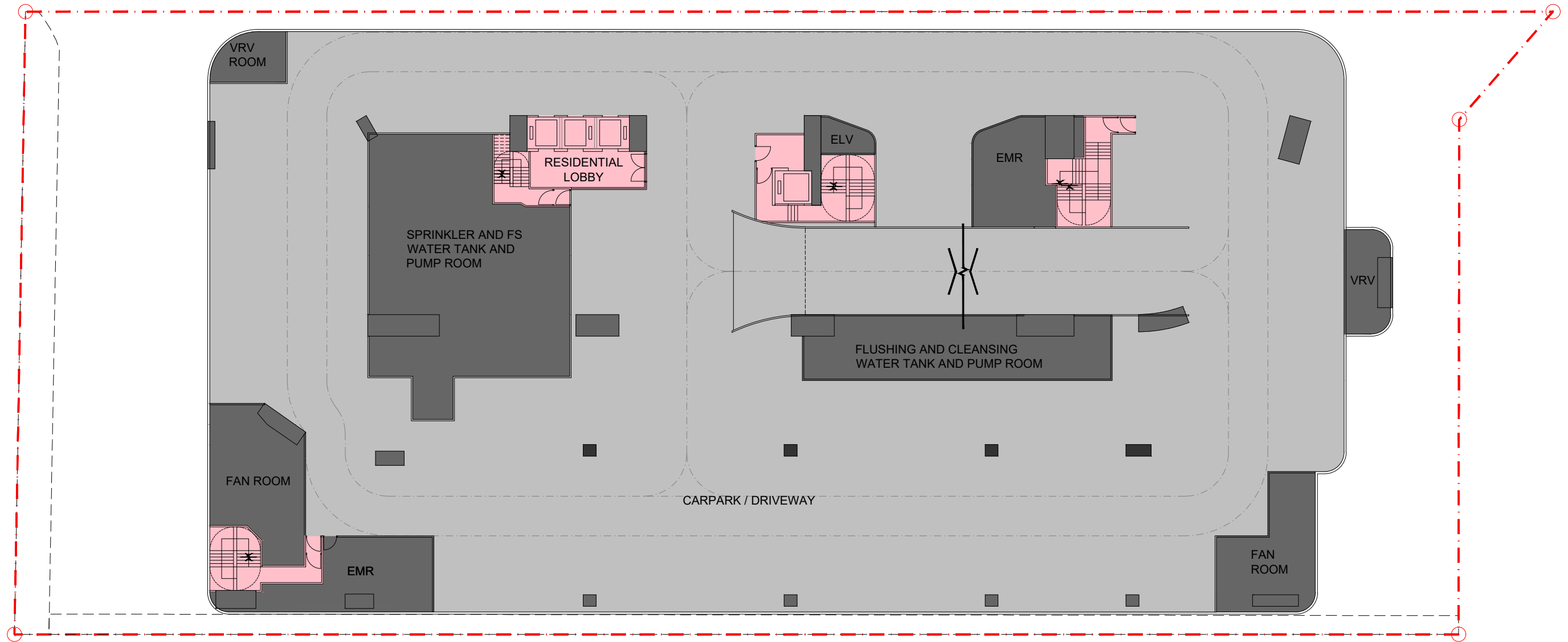
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4 MAY 2026
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+PARTNERS

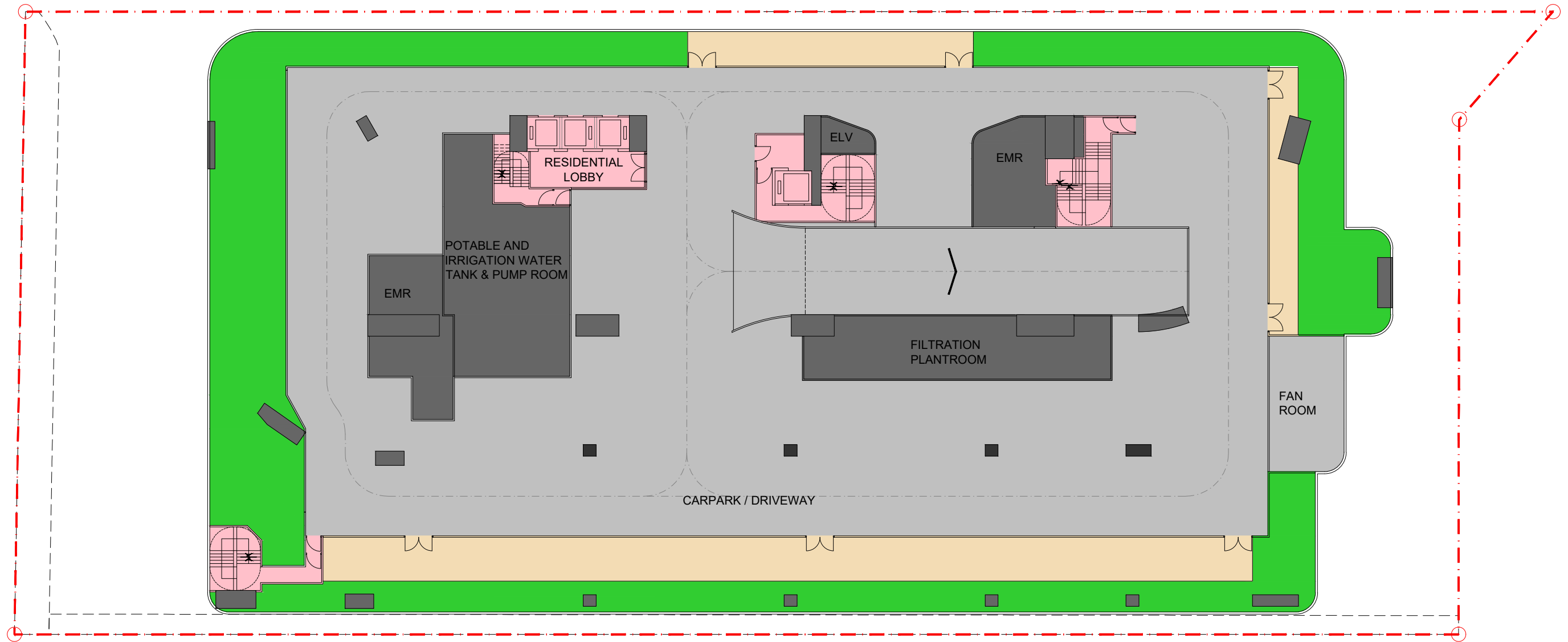
LEGEND:

- LOBBY
- CARPARK / DRIVEWAY
- E&M



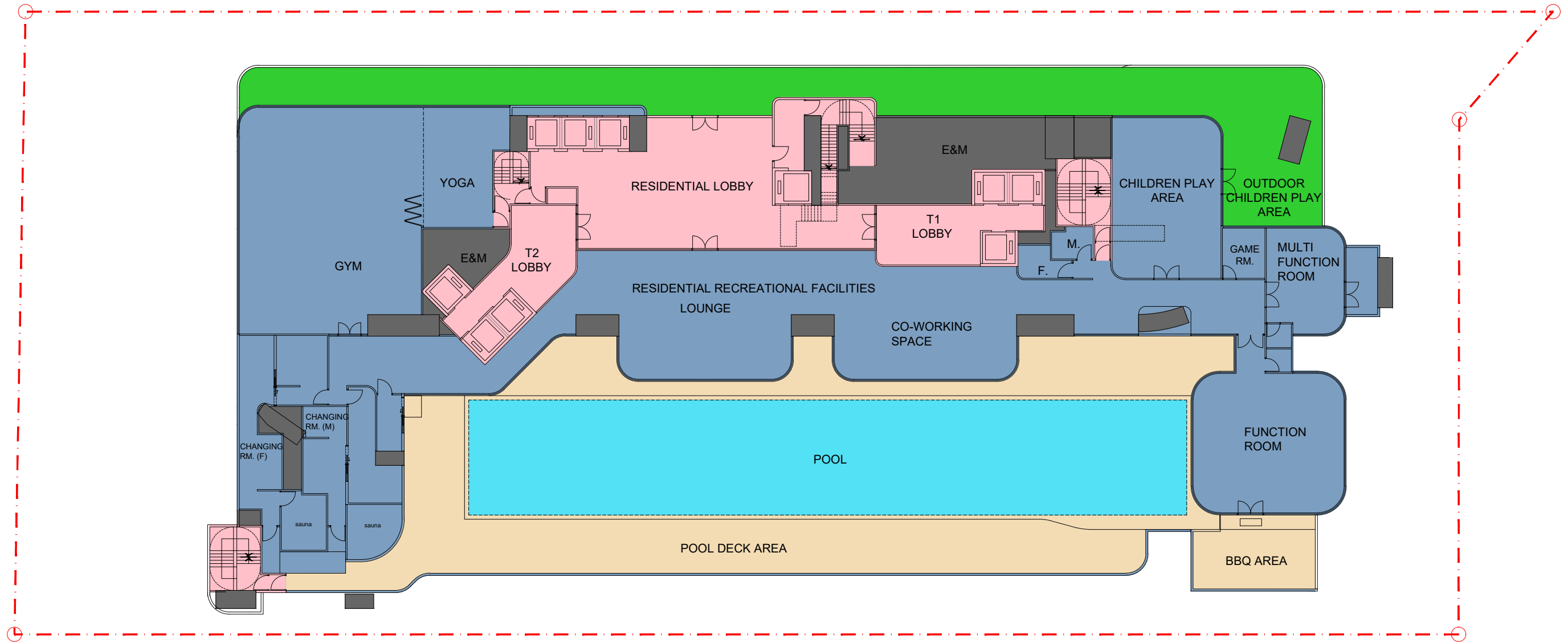
LEGEND:

- GREENERY
- DECK / FOOTPATH
- LOBBY
- CARPARK / DRIVEWAY
- E&M



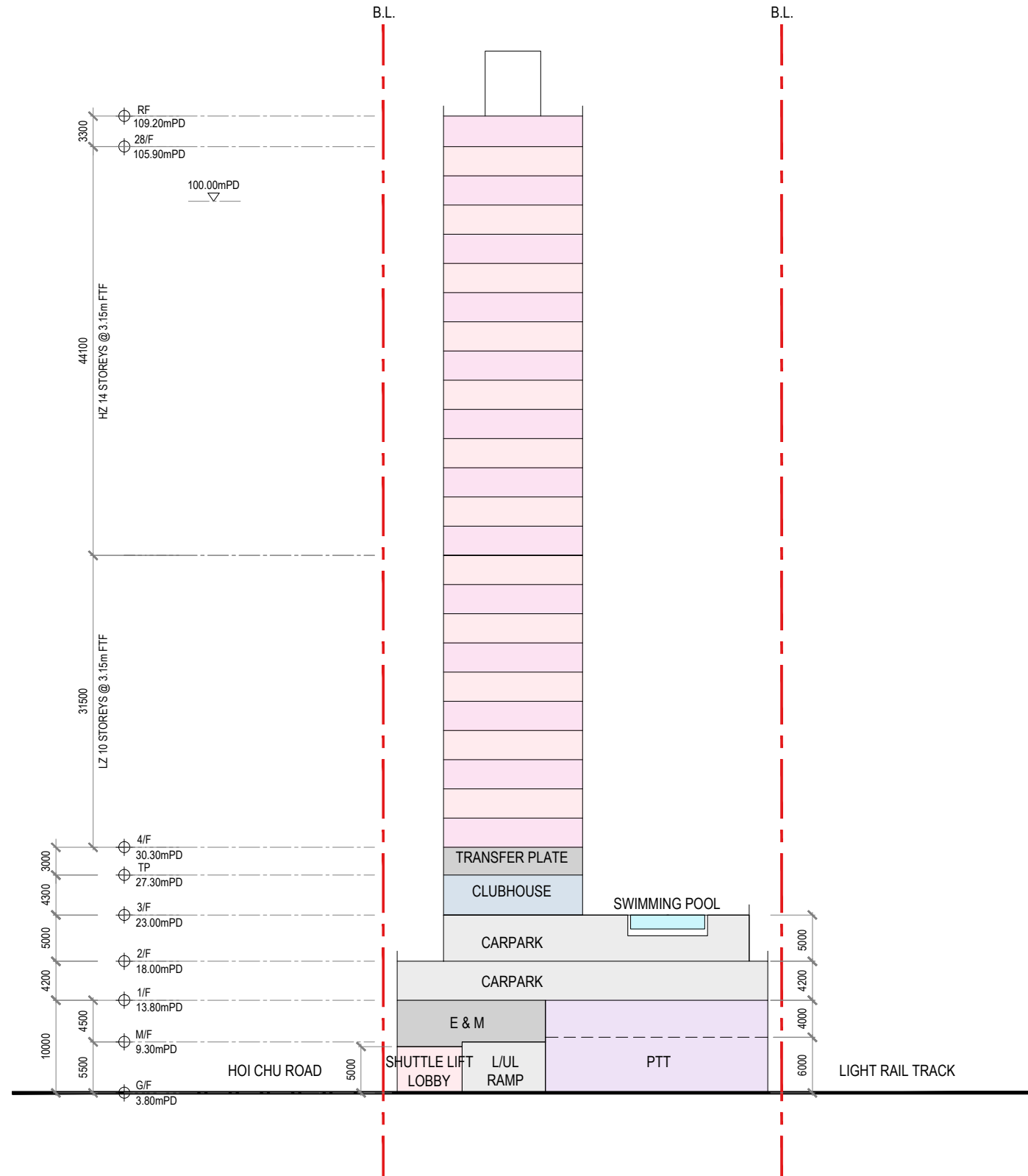
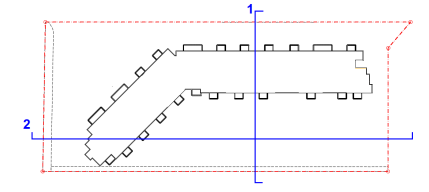
LEGEND:

- GREENERY
- RESIDENTIAL RECREATIONAL FACILITIES
- LOBBY
- DECK / FOOTPATH
- CARPARK / DRIVEWAY
- POOL
- E&M



LEGEND:

- RESIDENTIAL
- CLUBHOUSE
- CARPARK / DRIVEWAY
- POOL
- E&M / TRANSFER PLATE
- PTT



T.M.T.L. 569, Hoi Chu Road, Tuen Mun, N.T. Proposed Residential Development
 Section 16 - Application for Minor Height Relaxation

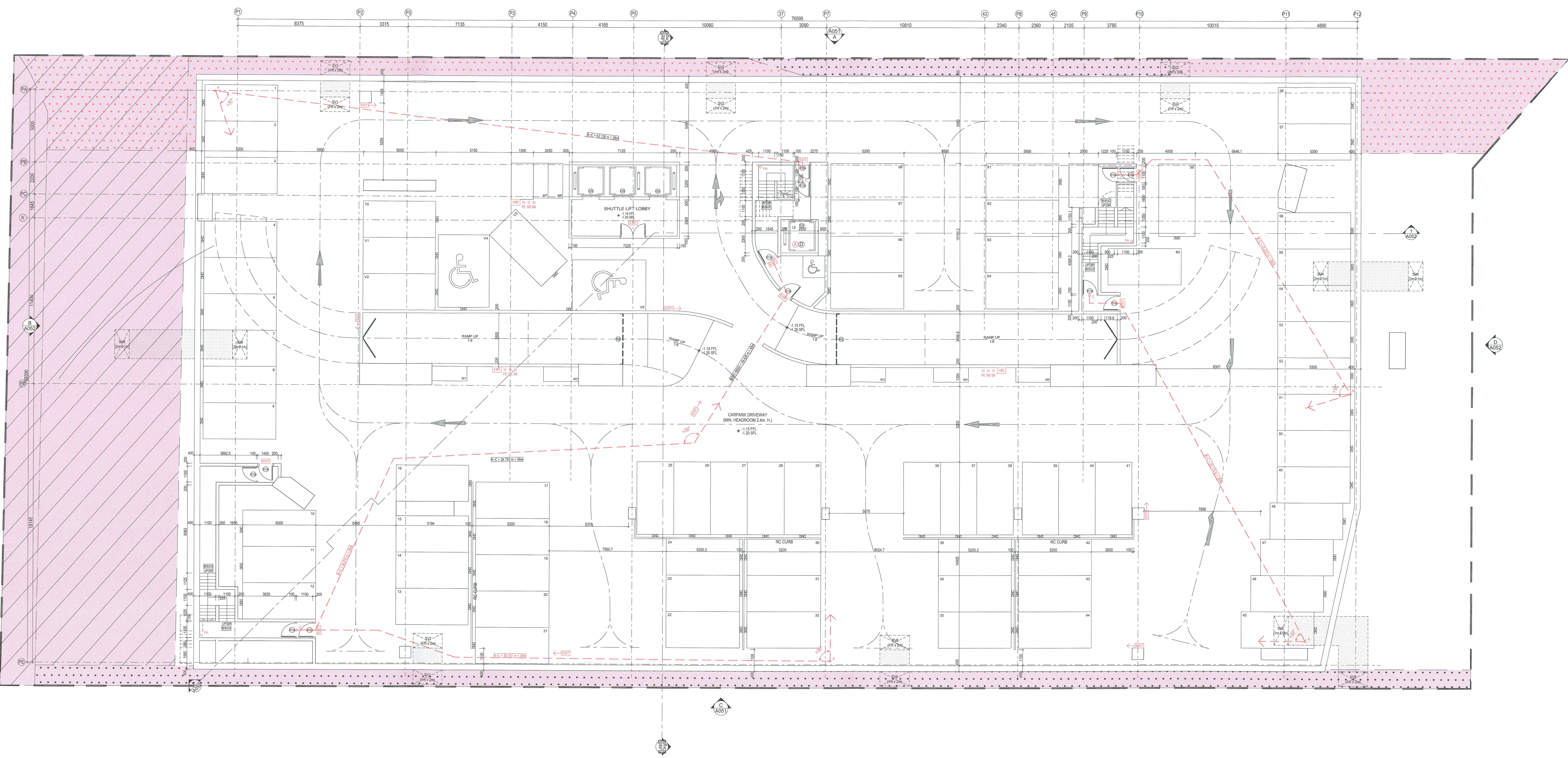
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SECTION 1

LWK
+PARTNERS

Appendix D

Basement Plan of the Approved GBP Scheme



BASEMENT FLOOR PLAN

- NOTES:**
1. IMPOSED LOAD FOR E & M ROOM = 7.5 KPa
 2. IMPOSED LOAD FOR CARPARK = 4.0 KPa
 3. IMPOSED LOAD FOR LIFT LOBBIES = 3.0 KPa
 4. AUTOMATIC SPRINKLER SYSTEM TO BE PROVIDED.
 5. ARTIFICIAL LIGHTING TO BE PROVIDED FOR ALL STAIRCASES.
 6. MECHANICAL VENTILATION TO BE PROVIDED FOR CARPARK.
 7. ALL SMOKE VENT DUCTS TO BE MIN. 1000 x 1000mm WIDTH FR 240/240/240 180 THK. RC WALL OR FR 240/240/240 DURASTEEL.
 8. 150MM CONCRETE CURBS TO ME ROOMS TO BE PROVIDED AS INDICATED ON THE PLAN. UPVC PIPE WITH FIRE COLLAR SHALL BE PROVIDED AT FIRE BARRIER FOR PIPEWORKS CONNECTING TO DRAIN PIT.
 9. THE FIRE DAMPER (1200) TO BE PROVIDED FOR ALL LOUVRES AT BASEMENT.
 10. 180 EV CHARGER RECESSED IN WALL TO BE PROVIDED FOR ALL PARKING SPACE.

LEGEND:

- PINK HATCHED BLACK
- PINK HATCHED BLUE
- PINK STIPPLED BLACK
- PINK STIPPLED BLUE
- PINK STIPPLED RED
- PINK HATCHED BLACK STIPPLED RED

TOTAL NOS. OF RESIDENTIAL PARKING = 73 NOS.
 (2500 W x 5000 L x 2400H) (NO. 1 - 51, 53 & 55 - 73)
 (3500 W x 5000 L x 2400H) ACCESSIBLE PARKING SPACE (NO. 52 & 54)

B/F SMOKE VENT CALCULATION
 (REFER DWG. NO. C131)
 = 2975.599 s.m. x 0.5 %
 = 14.878 s.m.

PROVIDED AREA

SVD No.	LONG	WIDTH	AREA
SV1	1,000	2,000	= 2,000 s.m.
SV2	1,000	2,000	= 2,000 s.m.
SV3	1,000	2,000	= 2,000 s.m.
SV4	2,000	1,000	= 2,000 s.m.
SV5	1,000	2,000	= 2,000 s.m.
SV6	1,000	2,000	= 2,000 s.m.
SV7	1,000	2,000	= 2,000 s.m.
SV8	1,000	2,000	= 2,000 s.m.
TOTAL			= 16,000 s.m. 14.878 s.m.

For FSD SUBMISSION
 Dated: 20251204

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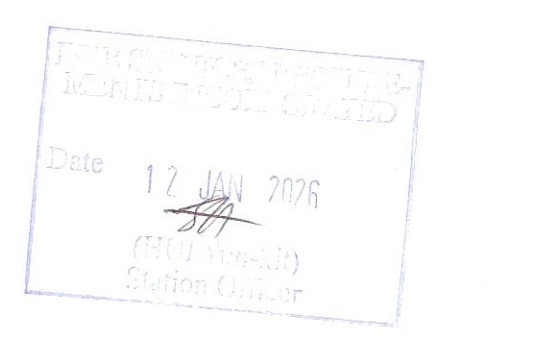
PROJECT
Residential Development at Hoi Chu Road, Tuen Mun TMTL 569

DRAWING TITLE
BASEMENT FLOOR PLAN

SCALE: 1:100 (A0)
 DRAWING NO. **A011** REV. NO.

SOURCE
LWK + PARTNERS
 15/F, High Tower World Finance Centre, Harbour City, 5th Floor, Kowloon
 15/F, 200-201, 202, 203, 204, 205, 206, 207, 208, 209, 210, 211, 212, 213, 214, 215, 216, 217, 218, 219, 220, 221, 222, 223, 224, 225, 226, 227, 228, 229, 230, 231, 232, 233, 234, 235, 236, 237, 238, 239, 240, 241, 242, 243, 244, 245, 246, 247, 248, 249, 250, 251, 252, 253, 254, 255, 256, 257, 258, 259, 260, 261, 262, 263, 264, 265, 266, 267, 268, 269, 270, 271, 272, 273, 274, 275, 276, 277, 278, 279, 280, 281, 282, 283, 284, 285, 286, 287, 288, 289, 290, 291, 292, 293, 294, 295, 296, 297, 298, 299, 300, 301, 302, 303, 304, 305, 306, 307, 308, 309, 310, 311, 312, 313, 314, 315, 316, 317, 318, 319, 320, 321, 322, 323, 324, 325, 326, 327, 328, 329, 330, 331, 332, 333, 334, 335, 336, 337, 338, 339, 340, 341, 342, 343, 344, 345, 346, 347, 348, 349, 350, 351, 352, 353, 354, 355, 356, 357, 358, 359, 360, 361, 362, 363, 364, 365, 366, 367, 368, 369, 370, 371, 372, 373, 374, 375, 376, 377, 378, 379, 380, 381, 382, 383, 384, 385, 386, 387, 388, 389, 390, 391, 392, 393, 394, 395, 396, 397, 398, 399, 400, 401, 402, 403, 404, 405, 406, 407, 408, 409, 410, 411, 412, 413, 414, 415, 416, 417, 418, 419, 420, 421, 422, 423, 424, 425, 426, 427, 428, 429, 430, 431, 432, 433, 434, 435, 436, 437, 438, 439, 440, 441, 442, 443, 444, 445, 446, 447, 448, 449, 450, 451, 452, 453, 454, 455, 456, 457, 458, 459, 460, 461, 462, 463, 464, 465, 466, 467, 468, 469, 470, 471, 472, 473, 474, 475, 476, 477, 478, 479, 480, 481, 482, 483, 484, 485, 486, 487, 488, 489, 490, 491, 492, 493, 494, 495, 496, 497, 498, 499, 500, 501, 502, 503, 504, 505, 506, 507, 508, 509, 510, 511, 512, 513, 514, 515, 516, 517, 518, 519, 520, 521, 522, 523, 524, 525, 526, 527, 528, 529, 530, 531, 532, 533, 534, 535, 536, 537, 538, 539, 540, 541, 542, 543, 544, 545, 546, 547, 548, 549, 550, 551, 552, 553, 554, 555, 556, 557, 558, 559, 560, 561, 562, 563, 564, 565, 566, 567, 568, 569, 570, 571, 572, 573, 574, 575, 576, 577, 578, 579, 580, 581, 582, 583, 584, 585, 586, 587, 588, 589, 590, 591, 592, 593, 594, 595, 596, 597, 598, 599, 600, 601, 602, 603, 604, 605, 606, 607, 608, 609, 610, 611, 612, 613, 614, 615, 616, 617, 618, 619, 620, 621, 622, 623, 624, 625, 626, 627, 628, 629, 630, 631, 632, 633, 634, 635, 636, 637, 638, 639, 640, 641, 642, 643, 644, 645, 646, 647, 648, 649, 650, 651, 652, 653, 654, 655, 656, 657, 658, 659, 660, 661, 662, 663, 664, 665, 666, 667, 668, 669, 670, 671, 672, 673, 674, 675, 676, 677, 678, 679, 680, 681, 682, 683, 684, 685, 686, 687, 688, 689, 690, 691, 692, 693, 694, 695, 696, 697, 698, 699, 700, 701, 702, 703, 704, 705, 706, 707, 708, 709, 710, 711, 712, 713, 714, 715, 716, 717, 718, 719, 720, 721, 722, 723, 724, 725, 726, 727, 728, 729, 730, 731, 732, 733, 734, 735, 736, 737, 738, 739, 740, 741, 742, 743, 744, 745, 746, 747, 748, 749, 750, 751, 752, 753, 754, 755, 756, 757, 758, 759, 760, 761, 762, 763, 764, 765, 766, 767, 768, 769, 770, 771, 772, 773, 774, 775, 776, 777, 778, 779, 780, 781, 782, 783, 784, 785, 786, 787, 788, 789, 790, 791, 792, 793, 794, 795, 796, 797, 798, 799, 800, 801, 802, 803, 804, 805, 806, 807, 808, 809, 810, 811, 812, 813, 814, 815, 816, 817, 818, 819, 820, 821, 822, 823, 824, 825, 826, 827, 828, 829, 830, 831, 832, 833, 834, 835, 836, 837, 838, 839, 840, 841, 842, 843, 844, 845, 846, 847, 848, 849, 850, 851, 852, 853, 854, 855, 856, 857, 858, 859, 860, 861, 862, 863, 864, 865, 866, 867, 868, 869, 870, 871, 872, 873, 874, 875, 876, 877, 878, 879, 880, 881, 882, 883, 884, 885, 886, 887, 888, 889, 890, 891, 892, 893, 894, 895, 896, 897, 898, 899, 900, 901, 902, 903, 904, 905, 906, 907, 908, 909, 910, 911, 912, 913, 914, 915, 916, 917, 918, 919, 920, 921, 922, 923, 924, 925, 926, 927, 928, 929, 930, 931, 932, 933, 934, 935, 936, 937, 938, 939, 940, 941, 942, 943, 944, 945, 946, 947, 948, 949, 950, 951, 952, 953, 954, 955, 956, 957, 958, 959, 960, 961, 962, 963, 964, 965, 966, 967, 968, 969, 970, 971, 972, 973, 974, 975, 976, 977, 978, 979, 980, 981, 982, 983, 984, 985, 986, 987, 988, 989, 990, 991, 992, 993, 994, 995, 996, 997, 998, 999, 1000

FOR OFFICIAL USE



Enclosure 2

Response to Comments and Supporting Attachments

	Departmental Comments	Responses to Comments
1.	Comments from Tuen Mun and Yuen Long West District Planning Office, Planning Department	
1.1	<p><u>General Comments</u></p> <p>The application seeks minor relaxation of building height (BH) restriction from 100mPD to 117.6mPD to facilitate the proposed private residential-cum-public transport terminus (PTT) development. The applicant claims that the proposed minor relaxation in BH arises from relocating the originally underground car park to above-ground in response to the latest Government initiatives. However, it is noted that the purported design merit of providing an additional refuge floor (of 5.5m) is not a statutory requirement and would further increase the overall BH. In addition, the inclusion of a transfer plate (of 1.5m) and the increased headroom proposed for the clubhouse (from 4.3m to 5m) and the top residential floor (from 3.3m to 4m) would collectively contribute to a significant increase in BH. These elements — namely the refuge floor, transfer plate floor, and additional headroom for the clubhouse and top residential floor — account for nearly 50% of the total height relaxation sought. This arrangement therefore cannot be regarded as one that purely follows Government’s latest initiative. The applicant should review and revise the scheme accordingly (e.g. remove the aforementioned elements). The applicant should also suggest alternative design merits (i.e. further building setbacks from the adjoining Oceania Height, provision of more greenery at low-zone and vertical green at the western edge of the podium).</p>	<p>The Applicant has thoroughly reviewed the comments and revised the proposed scheme. Under the latest proposed scheme, the proposed increase of height is <u>now solely due to relocation the originally underground car park to above-ground in response to the latest Government initiatives. All other changes that lead to further increase of building height (e.g. changes in clubhouse floor height; top residential floor height and incorporation of refuge floor) are now deleted.</u></p> <p>Under the current updated scheme, the proposed building height will be reduced from 117.6mPD to 109.2mPD. The proposed increase of height by 9.2m is solely for provision of 2 storeys of aboveground car park. For details of the scheme, please refer to Attachment A – Updated Scheme for consideration. For details of the design considerations, please refer to responses to Items 1.9 and 1.10 below.</p>

	Departmental Comments	Responses to Comments
	<p><u>Specific Comments</u></p> <p>1.2 Please demonstrate with a plan whether the local open space of 1m² per person is achievable after removing the sky garden-cum-refuge floor at the proposed development.</p> <p>1.3 <u>Para 3.1.3 and Figure 3.2:</u> Please explain the rationale for providing 4 separate ingress / egress points. Please indicate on the figure the locations of the 2 double-width bus bays and the 1 single-width bus bay.</p>	<p>Under the current proposed scheme, 1m² per person of local open space serving the residents can be provided. Please see Attachment B – Open Space Demarcation Plan.</p> <p>Due to the site configuration with only 1 street frontage facing Hoi Chu Road, the rationale of providing 4 separate ingress / egress points are as below:</p> <ul style="list-style-type: none"> • The site is elongated in configuration. PTT is required to be provided. Vehicular flows and directions of PTT traffic and development traffic have to be provided with respect the locations of XYZ and UVW under Lease; • The design of 4 separate ingresses / egresses aligns with the indicative schematic layout in support of the OZP amendment of the Subject Site into “Residential (Group A)29” before land sales in Year 2024. Such schematic layout with 4 separate ingresses / egresses was subsequently incorporated into the Lease; • From road safety perspective, it is the common practice to provide separate “ingresses” and “egresses” for development traffic and PTT. It will ensure a safe and smooth operation of the PTT by avoiding traffic other than franchised services entering the PTT; <p>Please see Attachment C – Reference Material from OZP Amendment and Lease for reference. The locations of the double-width bus bays and single-width bus bay are annotated on the revised G/F plan (please see Attachment A – Updated Scheme). Please understand that the PTT detailed internal layout is subject to ongoing liaison and approval by respective Government department(s).</p>

	Departmental Comments	Responses to Comments
1.4	<p><u>Para 3.3.2:</u> Please elaborate with plans why “the car park levels have to accommodate various uses, such as E&M uses”.</p>	<p>Please understand that the Subject Site is elongated in configuration and subject to various design constraints and considerations. The podium footprint is subject to various non-building areas and building separation requirements under Lease and Sustainable Building Design Guidelines (PNAP APP-152). A large portion of G/F also has to be occupied by PTT. To optimise the usage of floor space, it is necessary to co-design and integrate essential E&M facilities serving the PTT and the residential development across different levels at the podium (i.e. including the car parking floors). Detailed design considerations will be depicted in Item 1.9 and 1.10 below.</p> <p>To help understanding various E&M rooms at podium levels, their respective names are now highlighted on the floor plans. Please refer to Attachment A – Updated Scheme for consideration.</p>
1.5	<p><u>Para 3.3.3:</u> Given the carpark floors are of “4.2m” and “5m” respectively under the proposed scheme as compared to “5m” under the GBP approved scheme, please explain the basis of the statement “the applicant has minimised the floor-to-floor height of each storey of the above-ground carpark”.</p>	<p>Please see our responses to Item 1.10 below.</p>
1.6	<p><u>Para 3.3.4:</u> The statement that “refuge floors should be provided for all buildings exceeding 25 storeys in height” is not correct given such provision is not a pre-requisite provided that the main roof of building exceeding 25 storeys but not exceeding 40 storeys is designated as refuge floor, and may give a false imprecation that the approved GBP Scheme, which doesn’t involve a refuge floor, is not conforming to the regulations.</p>	<p>The refuge floor has been removed under the current updated scheme.</p>


	Departmental Comments	Responses to Comments
1.7	<p><u>Para 3.3.8:</u> Please explain the rationale for having a 10m-high headspace for the PTT and any scope to further reduce the extent to minimize the overall BH.</p>	<ol style="list-style-type: none"> Under the PTT's design requirements under Lease (i.e. Technical Schedule of the Public Transport Terminus of TMTL 569, Annex III – Para. 6), a minimum headroom of 6m by franchises bus shall be provided. Such requirement also aligns with the suggestion as indicated under Transport Planning and Design Manual (TPDM) Volume 9 - Table 8.7.3, which states that a 6m clear headroom is the preferred minimum headroom for PTT to facilitate satisfactory ventilation and visual acceptance; For the topside of the PTT above the clear 6m headroom, presence of structural support (i.e. long span structure system) is adopted to minimise column structures in the PTT for providing the necessary circulation and waiting space in the PTT. Provision of mechanical ventilation and maintenance platform above the PTT are also required.
1.8	<p><u>Para 3.3.10 and Figure 3.4:</u> Please explore the possibility to provide street-level (G/F) greenery. In view that the proposed periphery greenery has been relocated further up under the proposed scheme, please also advise the increase in area of green coverage as indicated on Figure 3.4.</p>	<p>The overall minimum site coverage of greenery provision based on the entire site (i.e. including the 4 strips of non-building area namely Pink Hatched Blue Area, Pink Hatched Black Area, Pink Stippled Black Area, and Pink Stippled Blue Area) is <u>20%</u> in accordance with requirement of the Sustainable Building Design Guidelines (PNAP APP-152). Under the current proposed scheme, the Applicant has distributed all proposed greenery within the Development Site (i.e. area excluding the 4 strips of non-building areas). Upon surrender of these non-building areas, the overall greenery within the Development Site will be up to about 21%.</p> <p>To promote visual interest and to soften the building mass as visually perceived by the public, an additional street-level greenery with an area of about 50m² is committed along the western boundary at the G/F. The proposed greenery will be in the form of both at-grade planters as well as vertical green. Please see the G/F plan in Attachment A – Updated Scheme for their respective locations.</p>

	Departmental Comments	Responses to Comments
1.9	<p><u>Figure 3.3, Design Consideration #2</u>: Please demonstrate with plans and elaborate in detail how the car ramp would affect the provision of E&M of the PTT. Please explain why the floors for E&M and carpark cannot be switched to avoid the potential impact of the car ramp that is purported to be occupying the space on E&M floor.</p>	<p>Please understand that the proposed development is not a solely private residential development, but with provision of a PTT as required under Lease. With respect to the design requirements of the PTT, minimum width for two-way traffic of 5.5m; and desirable gradient for car ramp of 1:10, a longer and more sizeable vehicular ramp has to be provided for leading the vehicles from the ingress / egress at Hoi Chu Road to the car parking floors at the floors above the PTT.</p> <p>To facilitate subsequent handover of the PTT for relevant Government authorities' operation and maintenance, plant rooms serving the PTT and the subject residential development have to be physically separated against each other as far as practical. For instance, all essential plant rooms have to be provided at-grade and at the M/F in close proximity to the PTT. Switching the E&M floors with the car parking floors above will lengthen the servicing channels connecting the plant rooms and the PTT, which is considered undesirable in terms of space and cost efficiency.</p>
1.10	<p><u>Figure 3.3, Design Consideration #3</u>: Please demonstrate with plans and elaborate in detail why the one level basement car park under the approved GBP Scheme will need to be spread across two levels at aboveground under the proposed development.</p>	<p><u>Basement Car Park Scheme (i.e. Approved GBP)</u> With basement carpark design, area for car park spaces can be optimized at basement floor because no E&M facilities were provided at basement. Also with consideration of minimizing the environment nuisance and time cost of site excavation, only 1 level of basement was proposed and it was able to accommodate the 70 nos. car parking spaces as required under Lease.</p> <p><u>Aboveground Car Park Scheme (i.e. Current Proposed Scheme)</u> In comparison, the area available for aboveground car park is constrained and 2-storey car park levels are required. The current S16 scheme is considered optimal due to the below design considerations:</p>

	Departmental Comments	Responses to Comments
		<ol style="list-style-type: none"> 1. The provision of PTT with a total height of 10m (i.e. to meet the minimum 6m clear headroom requirement and for provision of essential structural support; mechanical ventilation and maintenance platform above the PTT) will lead to the design of an extra-long vehicular ramp (with design standard complying with the requirements as mentioned above in Item 1.9) for serving development traffic connecting the ingresses / egresses to and from the car parking floors located above at 1/F and 2/F. Area available for car park is therefore constrained; 2. A majority of E&M plant rooms that rely on external louver for ventilation are required to locate at-grade or aboveground. Also with consideration to the designation of non-building areas as required under Lease; provision of building separations for compliance with Sustainable Building Design Guidelines; and respecting the maximum permissible site coverage under Building (Planning) Regulations, the area available for aboveground car park at podium levels is constrained and 1-storey car park level to accommodate all required ancillary car parking spaces of the subject residential development is area-wise infeasible; 3. To facilitate subsequent hand-over of the PTT to relevant Government authorities' for operation and maintenance, plant rooms serving the PTT have to be provided at-grade and at the M/F in close proximity to the PTT. Thus, most of the floor area at M/F are now occupied by upper part of the PTT with mechanical ventilation and maintenance platform serving the PTT. Remaining floor area are also reserved for essential plant rooms serving the PTT and the residential development based on the engineering and structural inputs currently available. It is therefore considered prudent and reasonable to design the car park at levels above the M/F under the subject S16 Proposed Scheme; and

	Departmental Comments	Responses to Comments
		<p>4. The Applicant has tried her best to control the proposed magnitude of increase of overall building height as minor as possible. To optimise use of floor space, the car parking spaces at the two levels of car parks have already been co-located with other necessary E&M facilities such as filtration plant room for the swimming pool; portable water tank; and flushing water tank and pump rooms serving the proposed residential development. 2/F car park spaces are also co-located with the sunken swimming pool tank.</p> <p>Overall speaking, the magnitude of increase in height due to relocation of car park to aboveground is considered minor and reasonable with design justifications.</p>
1.11	<p><u>Figure 3.3, Design Considerations #6 & #7</u>: Please refer to general comments provided in 1.1 above.</p>	<p>Please refer to our responses to Item 1.1 above.</p>
1.12	<p><u>Figure 3.3, Design Considerations #5 & #9</u>: Please refer to general comments provided in 1.1 above. In this regard, the need for a higher floor-to-floor height of the clubhouse (i.e. +0.7m to 5m) and topmost residential floor (i.e. +0.7m to 4m) should be justified. Please note that relaxation of BH restriction solely for private interests (e.g. enjoyment of residents) is not sufficient.</p>	<p>Please refer to our responses to Item 1.1 above.</p>
1.13	<p><u>Chapter 4.2</u>: The visual impacts from Hoi Chu Road Playground located to the immediate east of the site and the Wu Shan Riverside Park located to the further west of the site should be assessed. Please incorporate two additional VPs in the Visual Appraisal with associated photomontages.</p>	<p>The two additional VPs have been included. Please refer to Attachment D – Updated Photomontages for consideration.</p>

	Departmental Comments	Responses to Comments
1.14	<p><u>Chapter 4.2:</u> The consultant should avoid blank façade treatment of the proposed development and other nearby future developments in preparation of photomontages.</p>	<p>In reality, the building façade would not be a blank façade treatment. The visual presentation of the photomontages have been updated for illustration purpose. Please refer to Attachment D – Updated Photomontages for consideration. It should be highlighted that the design is only indicative and for illustrative purpose only. It will be subject to future design revision.</p>
1.15	<p><u>Section 5.3:</u> The purported incorporation of a refuge floor cannot be regarded as a design merit, as the addition of such a floor would in itself increase the BH and, consequently, the overall bulk of the development. The applicant should explore alternatives ways to “enhance the visual interest of the building façade”.</p>	<p>Under the latest proposed scheme, the proposed increase of building height has been reduced from 117.6mPD to 109.2mPD and now it is solely due to relocation the originally underground car park to above-ground in response to the latest Government initiatives. All other changes of building height (e.g. changes in clubhouse floor height; top residential floor height and incorporation of refuge floor) are now deleted.</p> <p>In any event, the Applicant would explore various ways to improve the visual interests of the building façade at subsequent detailed design stage as far as practical. For example, a mixture of building materials such as multiple tones and textures will be considered. Façade will be articulated in contour to enrich built form. Such façade treatment can effectively soften the perceivable building mass as visually perceived in its surroundings.</p>
1.16	<p><u>Section 5.3:</u> Furthermore, no additional design merits have been proposed, given that the provision of peripheral greenery and building setback have already been incorporated in the original scheme. The applicant should incorporate further measures to substantiate the proposal.</p>	<ol style="list-style-type: none"> Under the latest proposed scheme, it is now solely due to relocation the originally underground car park to above-ground <u>in response to the latest Government initiatives</u>;

	Departmental Comments	Responses to Comments
1.16	(Con't)	<p>2. The Applicant has tried her best effort to incorporate additional street-level greenery to promote visual interest and to soften the building mass as visually perceived by the public. On top of the 20% greenery provision required to be provided in the subject development (i.e. at 2/F and 3/F under the subject S16 Proposed Scheme), a street-level greenery (with a total area of about 50m²) is committed along the western boundary at G/F (see Attachment A – Updated Scheme). The proposed G/F greenery will be in form of both at-grade planters and vertical green.</p>  <p><i>Reference: Lohas Park, LP11, Villa Garda It was planted almost 1 year and "shade-tolerant plant species"</i></p> <p>It should be highlighted that the Applicant has exhausted possible areas for provision of low-zone greenery, as no planter shall be installed in other at-grade area to facilitate subsequent handover of PTT to Transport Department's for management.</p>

	Departmental Comments	Responses to Comments
1.16	(Con't)	<p>3. Non-building areas and building separations have been incorporated in the subject S16 proposed scheme.</p> <ul style="list-style-type: none"> i. Along the <u>western boundary</u>, a “non-building area with a width of 2.4m” has been provided. This non-building area also complies with the requirement under Lease (i.e. Pink Hatched Blue area); ii. Along the <u>western boundary</u>, a non-building area with a width of 12m only for the level at, above or over 23mPD is required under Lease (i.e. Pink Patched Black area). Under the subject S16 proposed scheme, the Applicant acts further and commits a full-height building separation of about 12m to promote permeability. This building separation would also help to comply with the minimum 20% permeability requirement under Sustainable Building Design Guidelines (PNAP APP-152); iii. Along the <u>southern boundary</u>, a non-building area with a width of about 1.3m has also been provided. This non-building area also complies with the requirement under Lease (i.e. Pink Stippled Black area); iv. Along the <u>northern boundary</u>, a strip of non-building area with a width of about 1.2m along the boundary abutting Hoi Chu Road is provided. This non-building area also complies with the requirement under Lease (i.e. Pink Stippled Blue area); and

	Departmental Comments	Responses to Comments
1.16	(Con't)	<p>v. Along the <u>eastern boundary</u>, the Applicant commits another building separation with a width ranging from about 4m to 7.5m. Other than a minor structure for Genset Room, Sprinkler Control Valve Room and Fire Control Room to serve the PTT, this building separation could contribute to promote permeability along the interface with the adjacent Hoi Chu Road Playground. This separation would also help to comply with the requirements under Sustainable Building Design Guidelines (PNAP APP-152).</p> <p>Please refer to Attachment E for consideration.</p> <p>4. The Proposed Development will also adopt the following good building design features to promote permeability and visual interests:</p> <ul style="list-style-type: none"> i. The G/F PTT will adopt minimal column design to facilitate penetration of air. ii. The western and eastern sides of the PTT will also be uncovered to promote permeability; iii. The carpark on 1/F and 2/F will not be fully enclosed but with open-able voids to facilitate natural ventilation as well as visual permeability when viewing from Hoi Chu Road and from Light Rail; and

	Departmental Comments	Responses to Comments
1.16	(Con't)	iv. In reality, the building façade would not be a blank façade treatment. The Applicant would explore various ways to improve the visual interests of the building façade at subsequent detailed design stage as far as practical. For example, a mixture of building materials such as multiple tones and textures will be considered. Façade will be articulated in contour to enrich built form. Such façade treatment can effectively soften the perceivable building mass as visually perceived in its surroundings.
1.17	<u>Section 5.3:</u> The applicant is reminded to clearly indicate the extent of setback and the area of green coverage on the relevant figures (e.g. Figure 3.4) for ease of reference and illustration.	For area of green coverage, please refer to the G/F, 2/F and 3/F plans in Attachment A – Updated Scheme . For non-building areas and building setback, please see Attachment E .
1.18	<u>Appendix B:</u> Please check the accuracy of layout plan and the section plan as there appears to be some inconsistencies (e.g. the footprint at M/F appears to be smaller in the layout plan as compared to the section plan).	Noted.
1.19	<u>Appendix B:</u> Please annotate the greenery on the section plan.	For area of green coverage, please refer to the G/F, 2/F and 3/F plans in Attachment A – Updated Scheme .
1.20	<u>Appendix B:</u> Please provide an additional section plan cutting across Tower 2 of Oceania Height and Hoi Chu Road Playground.	Please see Attachment A – Updated Scheme .

	Departmental Comments	Responses to Comments
1.21	<u>Greenery:</u> As stated above, please incorporate additional greenery at low-zone.	The Applicant has incorporated <u>additional street-level greenery of about 50m² along the western boundary at the G/F</u> of the proposed development to promote visual interest and to soften the building mass as visually perceived by the public. The proposed greenery will be in the form of both at-grade planters as well as vertical green. Please see G/F in Attachment A – Updated Scheme for consideration. Please understand that the exact area and extent of the at-grade planter and vertical green will still be subject to detailed design of the plant room design as well as the detailed design of PTT with coordination with Transport Department at subsequent stages.
1.22	<u>Greenery:</u> Please provide the greenery coverage (in both area and overall percentage) of the proposed development in low zone.	Please see above responses to Item 1.21.
1.23	<u>Greenery:</u> In relation to the above, please advise whether greywater would be used for irrigation of the greenery.	Subject to detailed arrangement at operation stage, greywater would be used for irrigation of the greenery as far as practical.
1.24	<u>Greenery:</u> Please advise whether the existing tree at the southern end of the Pink Hatched Blue Area would be affected by the proposed development and the proposed preservative measures.	The existing tree at the southern end will be felled because its current location by situating in the middle of the Pink Hatched Blue Area, which conflicts with the future pedestrian footpath required to be re-provided and surrendered to the Government upon completion under lease (condition 15(b) under lease). For information, a Tree Preservation and Removal Proposal (TPRP) was submitted and approved by LandsD on 24 April 2026.
1.25	Noting that the Site is sandwiched by Hoi Chu Road to the north and a LRT Goodview Garden Station to the south, please advise if the noise impact of the proposed development has been assessed and the mitigation measures to minimise impacts to the future residents.	A Noise Impact Assessment is to be carried out for the proposed development under the lease condition. Based on that impact assessment, acoustic window and balcony would be adopted to mitigate the potential traffic noise and railway noise impact, when it is necessary.


	Departmental Comments	Responses to Comments
1.26	<p>A Technical Feasibility Study (TFS) had been conducted to facilitate rezoning the subject site to “R(A)29” in 2025. In the indicative scheme prepared under the TFS, the estimated number of residents were about 1,418 nos., which is fewer than the proposed development under application (i.e. 1,820 nos.). In this regard, please advise whether any traffic or sewerage impacts would be brought about by the increased numbers of resident.</p>	<p>The Proposed Scheme conforms to the planning intention, land uses and plot ratio as set out in the OZP and maintains the same GFA as per the OZP-compliant scheme. The subject matter of the subject planning application focuses on a slight increase of building height from 100mPD to 109.2mPD. The nos. of flats of 700 is also the same as that under the Approved GBP.</p> <p>The subject S16 planning application sought to increase the increase of building height for relocation of car park to aboveground under the Government initiatives. It is understood that there were no adverse departmental comments from respective Government department.</p>
1.27	<p>Please advise the percentage of parking spaces to be equipped with electric vehicle charging-enabling facilities.</p>	<p>100% of the parking space will be equipped with electric vehicle charging-enabling facilities.</p>
1.28	<p>Please confirm whether the proposed development would fulfil the Sustainable Building Design Guidelines under PNAP APP-152.</p>	<p>Please be confirmed the proposed development would fulfil the Sustainable Building Design Guidelines under PNAP APP-152. Detailed demonstration will be provided at subsequent GBP submission stage for approval of relevant Government authority.</p>

	Departmental Comments	Responses to Comments
2.	Comments from Urban Design Section, Planning Department	
2.1	<p><u>Urban Design</u></p> <p>The proposed increase in BH appears to be not solely attributable to the need to accommodate the two-storey aboveground car parks.</p>	<p>The Applicant has thoroughly reviewed the comments and revised the proposed scheme. Under the latest proposed scheme, the proposed increase of height is <u>now solely due to relocation the originally underground car park to above-ground in response to the latest Government initiatives. All other changes that lead to further increase of building height (e.g. changes in clubhouse floor height; top residential floor height and incorporation of refuge floor) will not be pursued.</u></p> <p>Under the current updated scheme, the proposed building height will be reduced from 117.6mPD to 109.2mPD. The proposed increase of height by 9.2m is solely for provision of 2 storeys of aboveground car park. For details of the scheme, please refer to Attachment A – Updated Scheme for consideration. For details of the design considerations, please refer to responses-to-items 1.9 and 1.10 above.</p>
2.2	<p><u>Visual</u></p> <p>PS: The floor plan of 1/F shows a significant setback that appears inconsistent with the section plan.</p>	<p>The Applicant has reviewed the proposed scheme. For updated drawings, please refer to Attachment A – Updated Scheme for consideration.</p> <p>For non-building areas / building setbacks, please refer to responses-to-item 1.16 above.</p>

	Departmental Comments	Responses to Comments
2.3	<p>VA: There was no VP from the public viewpoint (VP) to the west of the Site (i.e. from Promenade along Wu Shan Riverside Park).</p> <p><u>Photomontages</u></p>	<p>An additional VP as viewing from the western side at the promenade along Wu Shan Riverside Park has been included. Please refer to Attachment D – Updated Photomontages for consideration.</p> <p>All photomontages have been updated to reflect the latest proposed scheme, which its building height has been reduced from 117.6mPD to 109.2mPD. Please see Attachment D – Updated Photomontages for consideration. The Visual Appraisal has also been updated accordingly. Please refer to Enclosure A – Updated Planning Statement of this Supplementary Submission for consideration.</p>
2.4	<p>VP 1 (figure 4.1) – the proposed development appears to be taller (i.e. appears to be level with Goodview Garden) and half of the proposed development should be screened by Goodview Garden and Tsui Ning Garden at the foreground in the photomontage. In view of the slight visual obstruction to the open sky view, the overall visual impact of VP1 should be <u>Slight</u> instead of <u>Negligible / slight</u>.</p>	<p>Under the current updated scheme, the proposed building height will be reduced from 117.6mPD to 109.2mPD. At VP1, the proposed development will have a comparable height as the adjacent building cluster. A majority portion of the proposed development would also be screened by Goodview Garden and Tsui Ning Garden at the foreground. The overall visual impact of VP1 has been amended to slight.</p>
2.5	<p>VP 2 (para 4.2.9 and figure 4.2) – in view that the VP represents public viewers at an open space with high usage and its relative close proximity to the Site, the visual sensitivity should be <u>High</u>. With reference to the photomontage, the proposed development will slightly obstruct the open sky, the rating of overall visual impact of VP2 should be <u>Slight</u> instead of <u>Negligible</u>.</p>	<p>Under the current updated scheme, the proposed building height will be reduced from 117.6mPD to 109.2mPD. At VP2, only a very minor portion of the proposed development would obstruct the open sky. The overall visual impact of VP2 has been amended to slight.</p>

	Departmental Comments	Responses to Comments
2.6	<p>VP 3 (para 4.2.10 and figure 4.3) – the proposed development appears to be taller (i.e. taller than Goodview Garden). As the VP represents public viewers at an open space with high visibility of the proposed development, the visual sensitivity should be as “High”. Explanation has not been provided as to why a more direct open space adjacent to the proposed development has not been chosen for the VA.</p>	<p>An additional VP as viewing from the open space adjacent to the proposed development has been included. Please refer to Attachment D – Updated Photomontages for consideration. The Visual Appraisal has also been updated accordingly. Please refer to Enclosure A – Updated Planning Statement of this Supplementary Submission for consideration.</p>
2.7	<p>Para 4.2.12 - according to TPB PG-No.41A, “acceptable” is not one of the thresholds of the evaluation of overall visual impact. The overall visual impact rating will range from “negligible” to “slight”.</p> <p><u>Air Ventilation</u></p>	<p>The overall visual impact of VP1 has been amended to slight.</p>
2.8	<p>While the applicant has proposed a minor relaxation of the BHR from 100mPD to 117.6mPD (+17.6m), it is observed that the two aboveground carpark storeys have floor-to-floor heights of 4.2m and 5 m respectively. As such, the proposed increase in building height is not solely attributed to the addition of the two storeys of aboveground carparks. If the increase in building height is due to other factors, clarification should be provided. Notwithstanding that the site does not fall within breezeway, noting that a PTT will be provided on the ground floor, the applicant should carefully explain whether any Air Ventilation implication would be resulted after the proposed increase.</p>	<p>Under the latest proposed scheme, the proposed increase of height is <u>now solely due to relocation the originally underground car park to above-ground in response to the latest Government initiatives. All other changes that lead to further increase of building height (e.g. changes in clubhouse floor height; top residential floor height and incorporation of refuge floor) will not be pursued.</u></p> <p>Under the current updated scheme, the proposed building height will be reduced from 117.6mPD to 109.2mPD. The proposed increase of height by 9.2m is solely for provision of 2 storeys of aboveground car park.</p> <p>There will be no air ventilation implication induced by the current proposed scheme in view of the following considerations:-</p>

	Departmental Comments	Responses to Comments
		<ul style="list-style-type: none"> The Subject Site does not fall within major breezeways under annual condition and summer condition. According to the Final Report for Expert Evaluation on Air Ventilation Assessment on Tuen Mun New Town (Figure 5.16 and Figure 5.17), the major breezeway/air paths in the Southern Inner Core of Central Area of Tuen Mun New Town where the subject site is located, Tuen Mun Heung Sze Wui Road, Wong Chu Road, Hoi Wing Road and that along the Tuen Mun River. The subject site is at least 200m away from these identified breezeway/air paths. <div data-bbox="1265 651 2016 1241" data-label="Figure"> </div> <p data-bbox="1173 1257 2107 1321">Figure 5.16 Major breezeways/air paths in the Southern Inner Core of Central Area of Tuen Mun New Town (annual condition).</p>

	Departmental Comments	Responses to Comments
		 <p>Figure 5.17 Major breezeways/air paths in the Southern Inner Core of Central Area of Tuen Mun New Town (summer condition).</p> <ul style="list-style-type: none"> To the south and north of the Subject Site, existing high-rise developments are located at upwind area, such as The Sea Crest (~92mPD), Tuen Mun Central Square (~114mPD) are to the south while Goodview Garden (~105mPD) to the north. These high-rise developments would reduce the wind flow towards the Subject Site and surrounding areas. Hoi Chu Road, the Light Rail Transit as well as the Hang Fu Street are expected to be the localized air flow paths for the area. The Subject Site would not encroach to these localized air flow paths, i.e. no significant impact upon them after the proposed increase of building height;

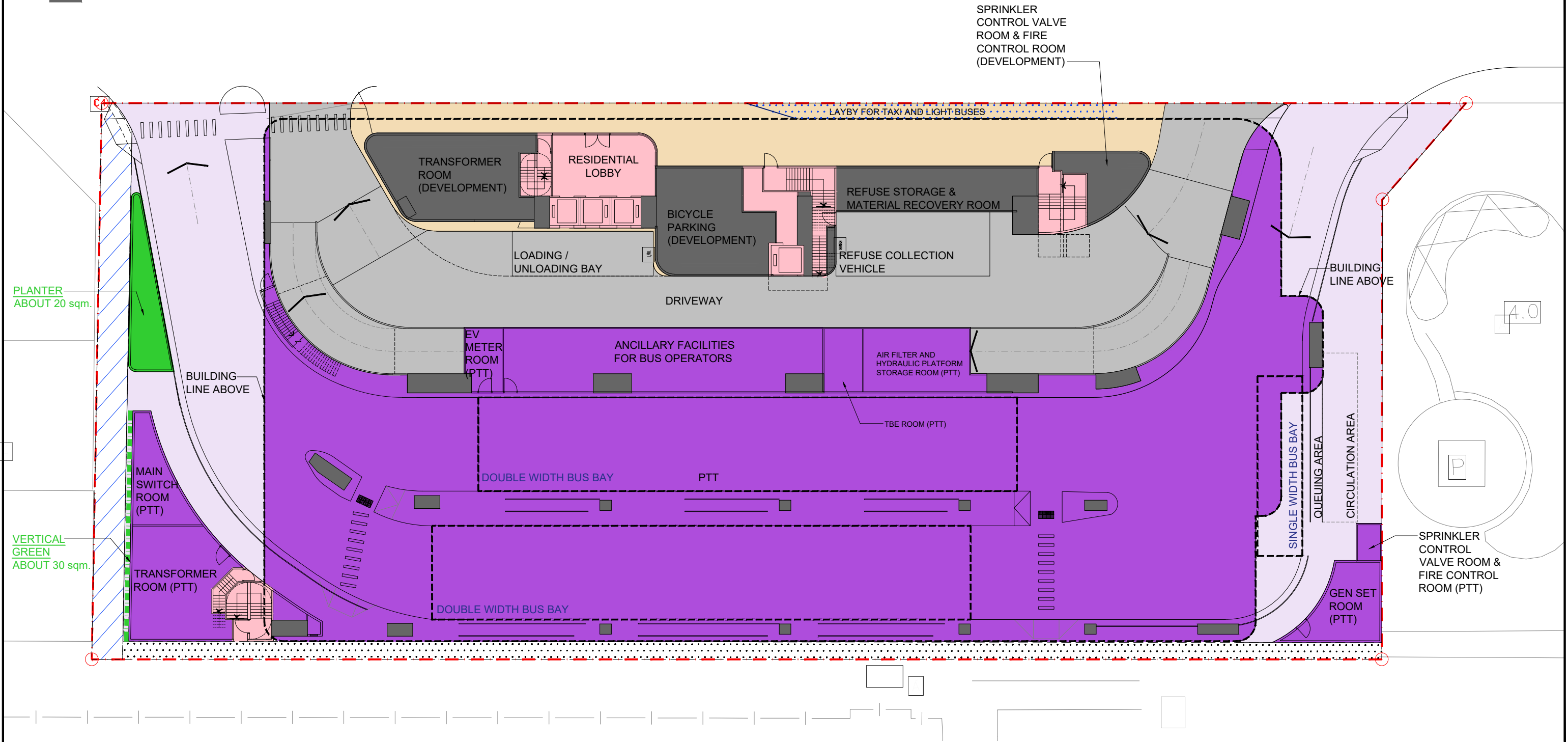
	Departmental Comments	Responses to Comments
		<ul style="list-style-type: none"> • The Ho Chu Road Playground is not located at downwind area of the Subject Site under both annual and summer wind directions. Instead, it is located at the upwind area under the dominant eastern wind direction. So, the wind performance of this playground would not be affected due to the proposed increase of the building height; • The provision of PTT is required under lease and provided in both the OZP-compliant scheme as well as the current proposed scheme. In view of the non-building areas and building setbacks to be provided along the western and eastern site boundary, it would facilitate wind penetration in between the Subject Site and the adjacent Oceania Heights and Hoi Chu Road Playground; • The Proposed Scheme conforms to the planning intention, land uses and plot ratio as set out in the OZP and maintains the same GFA as per the OZP-compliant scheme. The subject matter of the subject planning application focuses on a slight increase of building height from 100mPD to 109.2mPD. The air ventilation performance, in particular at pedestrian level, is considered comparable against the OZP-compliant scheme.

Attachment A

Updated Scheme & Development Schedule

LEGEND:

- GREENERY
- DECK / FOOTPATH
- PINK HATCHED BLUE AREA (NON-BUILDING AREA)
- LOBBY
- UNCOVERED PTT AREA
- PINK STIPPLED BLACK AREA (NON-BUILDING AREA)
- CARPARK / DRIVEWAY
- COVERED PTT AREA
- PINK STIPPLED BLUE AREA (NON-BUILDING AREA)
- E&M



T.M.T.L. 569, Hoi Chu Road, Tuen Mun, N.T. Proposed Residential Development
 Section 16 - Application for Minor Height Relaxation

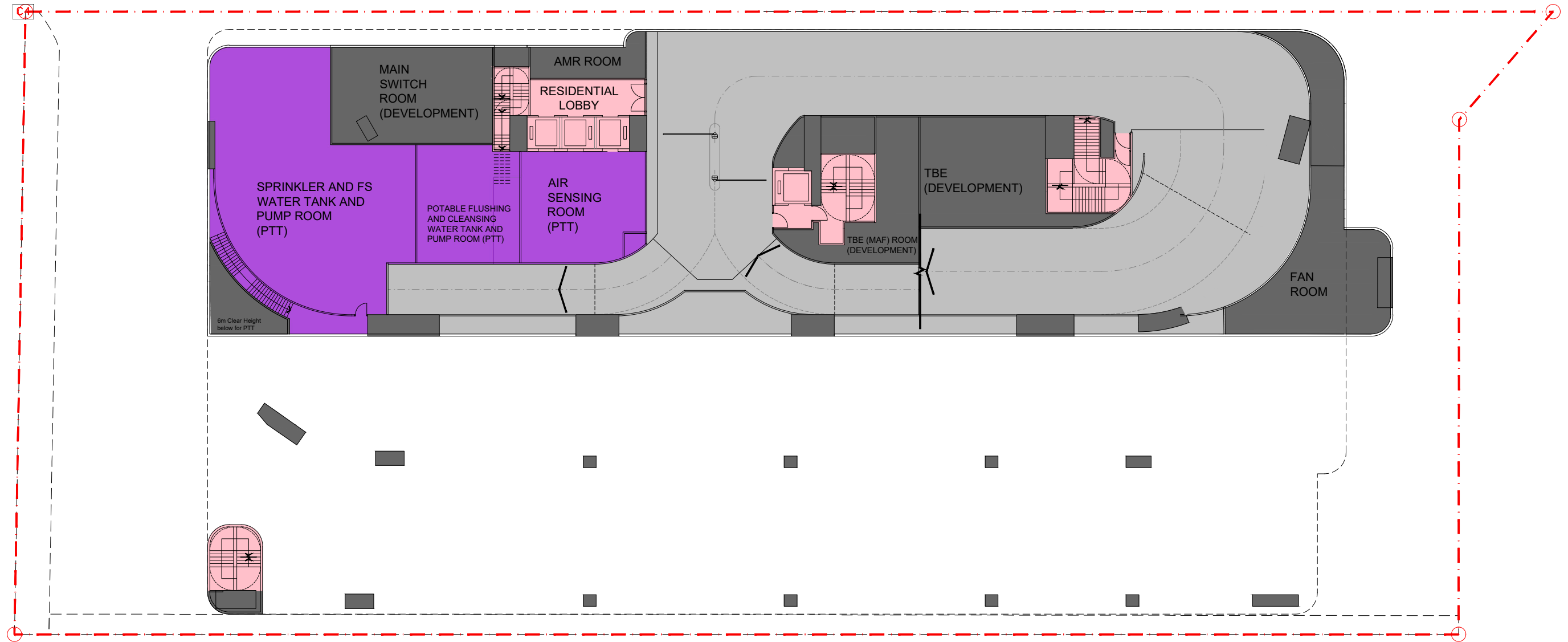
G/F (+3.80 mPD)

LWK
+PARTNERS

4 MAY 2026
 1:300

LEGEND:

- LOBBY
- CARPARK / DRIVEWAY
- E&M
- COVERED PTT AREA



T.M.T.L. 569, Hoi Chu Road, Tuen Mun, N.T. Proposed Residential Development
Section 16 - Application for Minor Height Relaxation

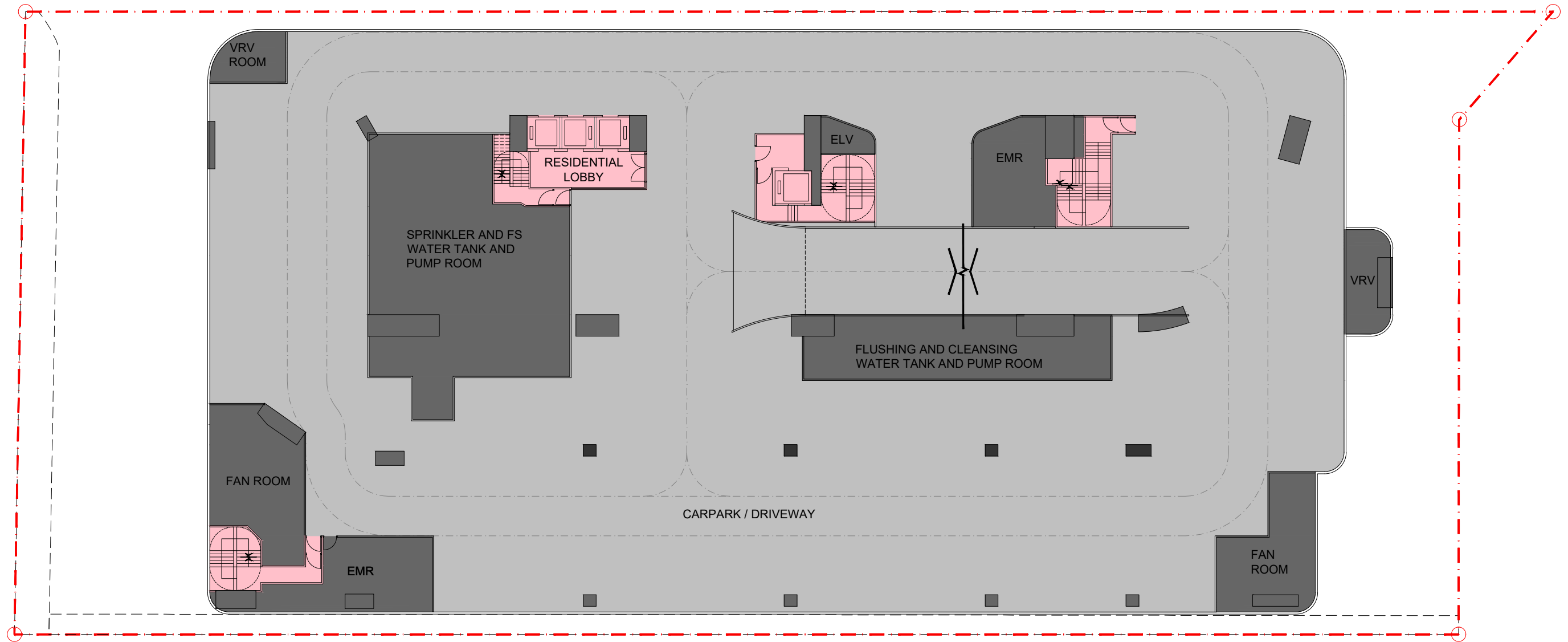
M/F (+9.30 mPD)

4 MAY 2026
1:300

LWK
+PARTNERS

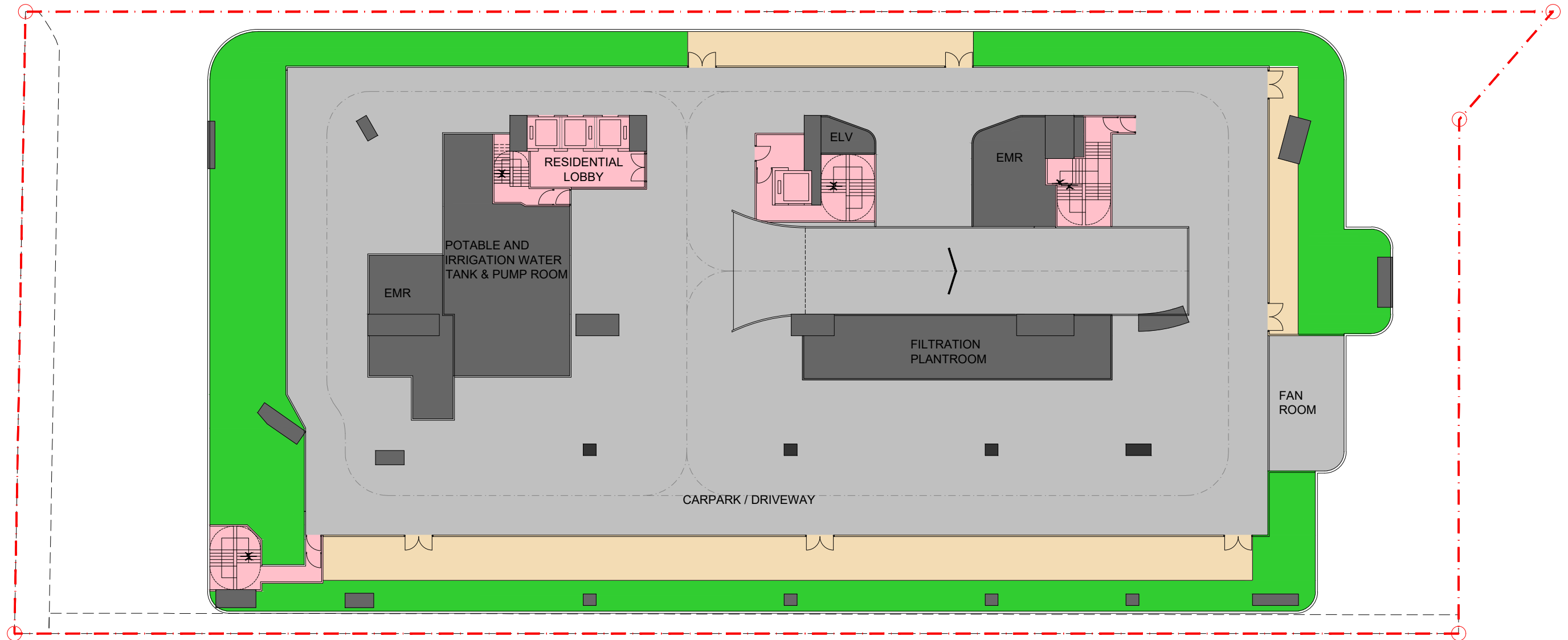
LEGEND:

- LOBBY
- CARPARK / DRIVEWAY
- E&M



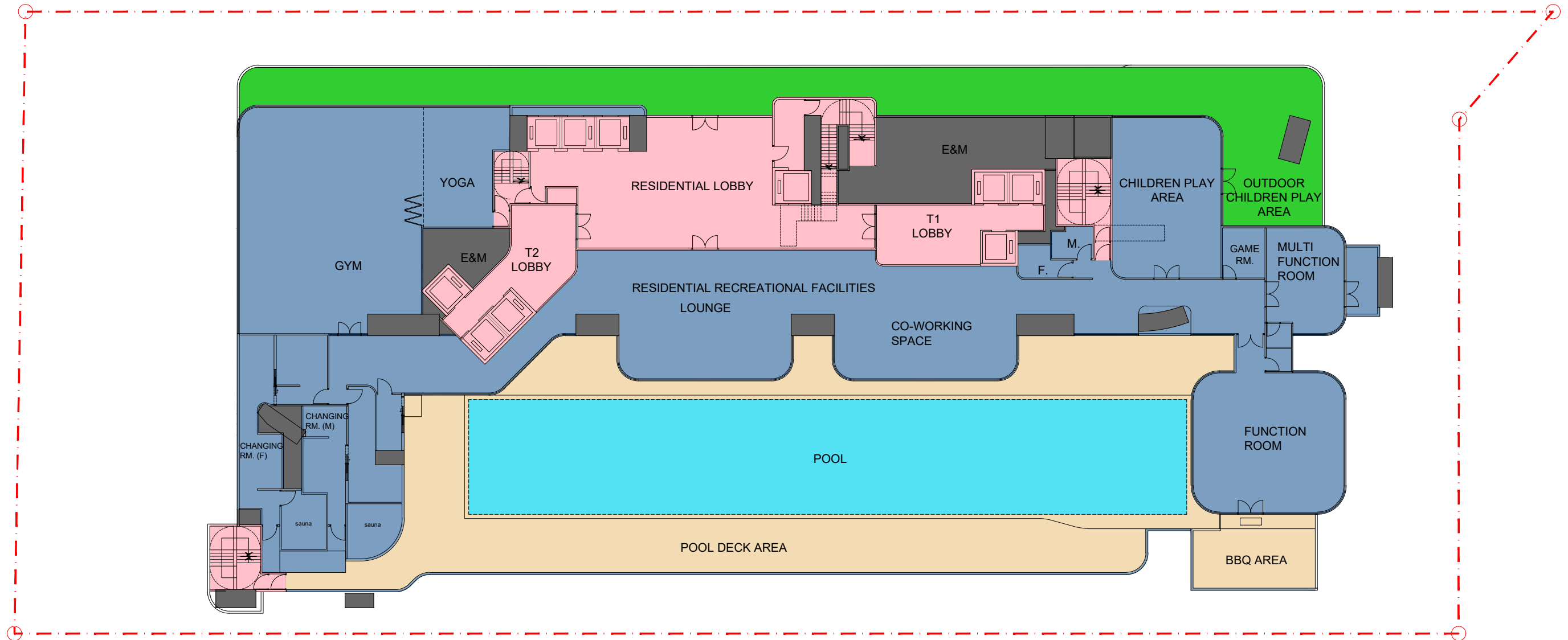
LEGEND:

- GREENERY
- DECK / FOOTPATH
- LOBBY
- CARPARK / DRIVEWAY
- E&M



LEGEND:

- GREENERY
- RESIDENTIAL RECREATIONAL FACILITIES
- LOBBY
- DECK / FOOTPATH
- CARPARK / DRIVEWAY
- POOL
- E&M



T.M.T.L. 569, Hoi Chu Road, Tuen Mun, N.T. Proposed Residential Development
Section 16 - Application for Minor Height Relaxation

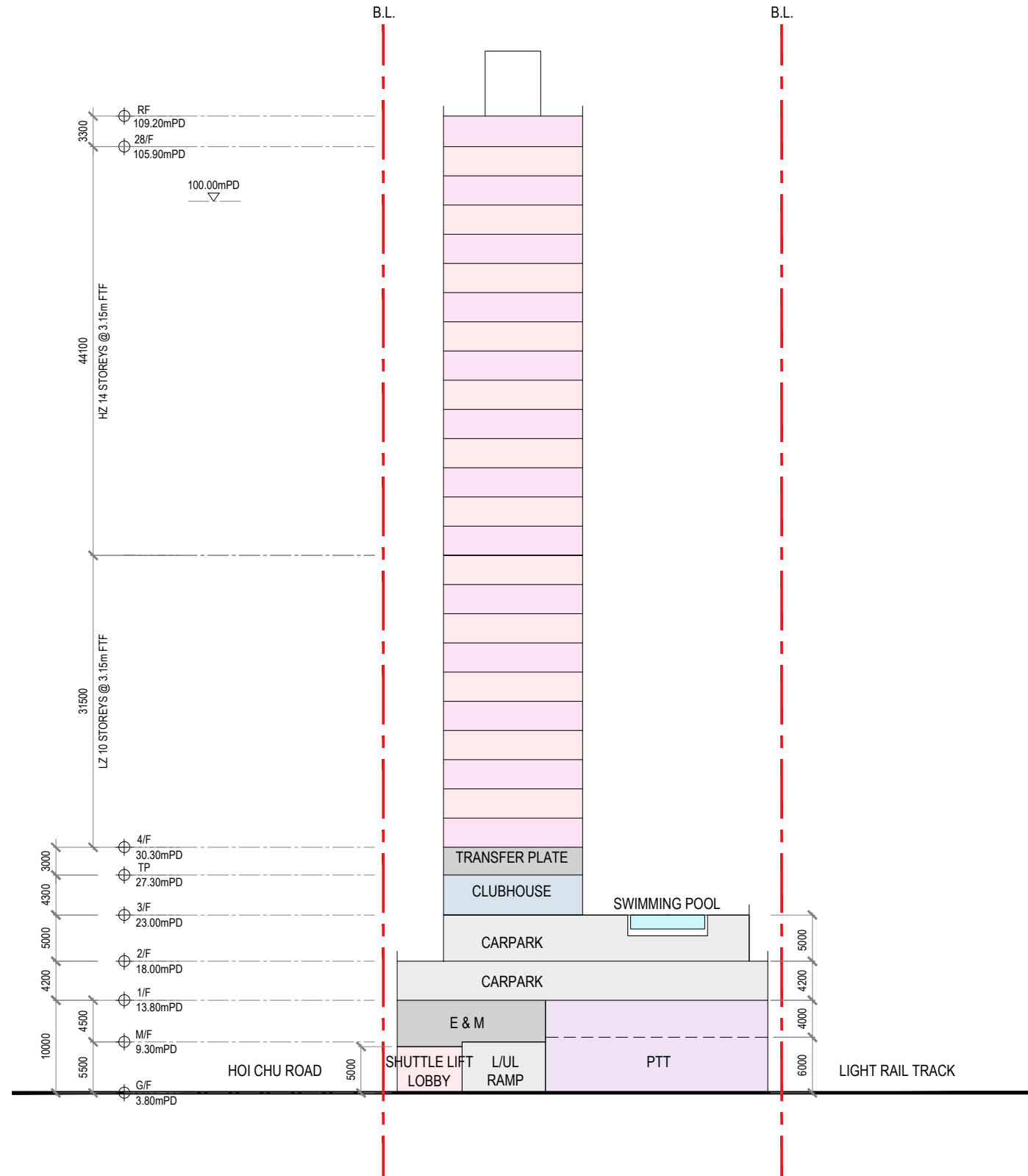
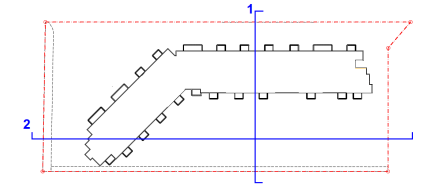
3/F (+23.00 mPD)

4 MAY 2026
1:300

LWK
+PARTNERS

LEGEND:

- RESIDENTIAL
- CLUBHOUSE
- CARPARK / DRIVEWAY
- POOL
- E&M / TRANSFER PLATE
- PTT



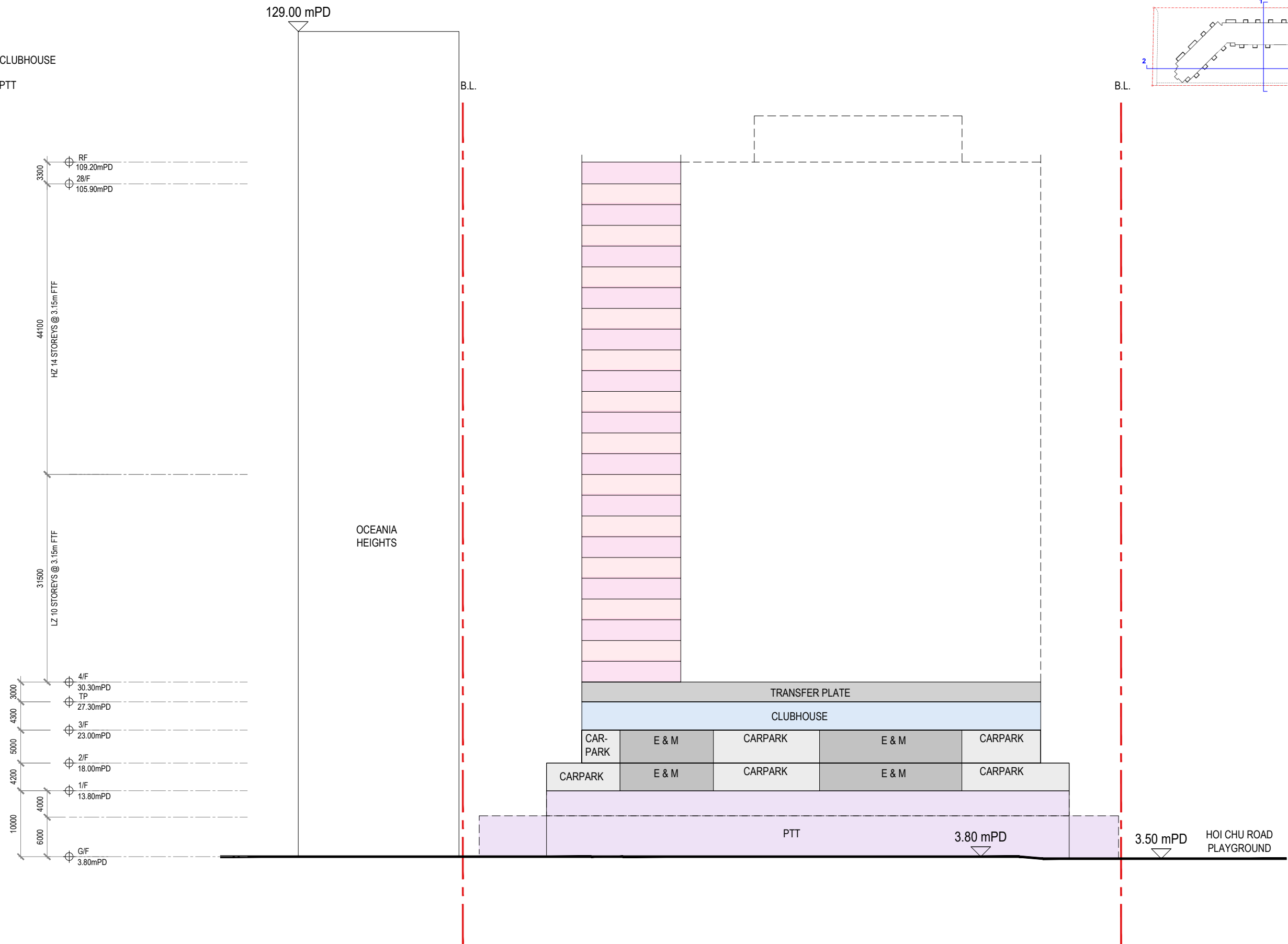
T.M.T.L. 569, Hoi Chu Road, Tuen Mun, N.T. Proposed Residential Development
 Section 16 - Application for Minor Height Relaxation

4 MAY 2026
 1:600

SECTION 1

LEGEND:

- RESIDENTIAL
- CLUBHOUSE
- CARPARK / DRIVEWAY
- PTT
- E&M / TRANSFER PLATE



T.M.T.L. 569, Hoi Chu Road, Tuen Mun, N.T. Proposed Residential Development
Section 16 - Application for Minor Height Relaxation

SECTION 2

LWK
+PARTNERS

4 MAY 2026
1:600

Table 3.1 - Development Schedule (June 2026)

	Approved GBP Scheme (A)	Proposed Scheme (B)	Difference (B) - (A)
Site area (about) (m²)	4,368	4,368	Nil
GFA (about) (m²)			
• Domestic	• 26,208	• 26,208	• Nil
• PTT ⁽¹⁾	• 1,741 ⁽²⁾	• 1,741 ⁽²⁾	• Nil
Plot ratio (about)			
• Domestic	• 6	• 6	• Nil
• PTT ⁽¹⁾	• 0.4	• 0.4	• Nil
Building height at main roof (not more than) (mPD)	100	109.2	+9.2m / 9.2%
No. of Storeys			
• Aboveground	• 28 ⁽³⁾	• 30 ⁽³⁾	• +2
• Basement	• 1	• 0	• -1
Site Coverage (about)	Domestic: 25.15%	Domestic: 25.15%	Nil
No. of Blocks	1	1	Nil
No. of Units	700	700	Nil
Average Flat Size (about) (m²)	37.5	37.5	Nil

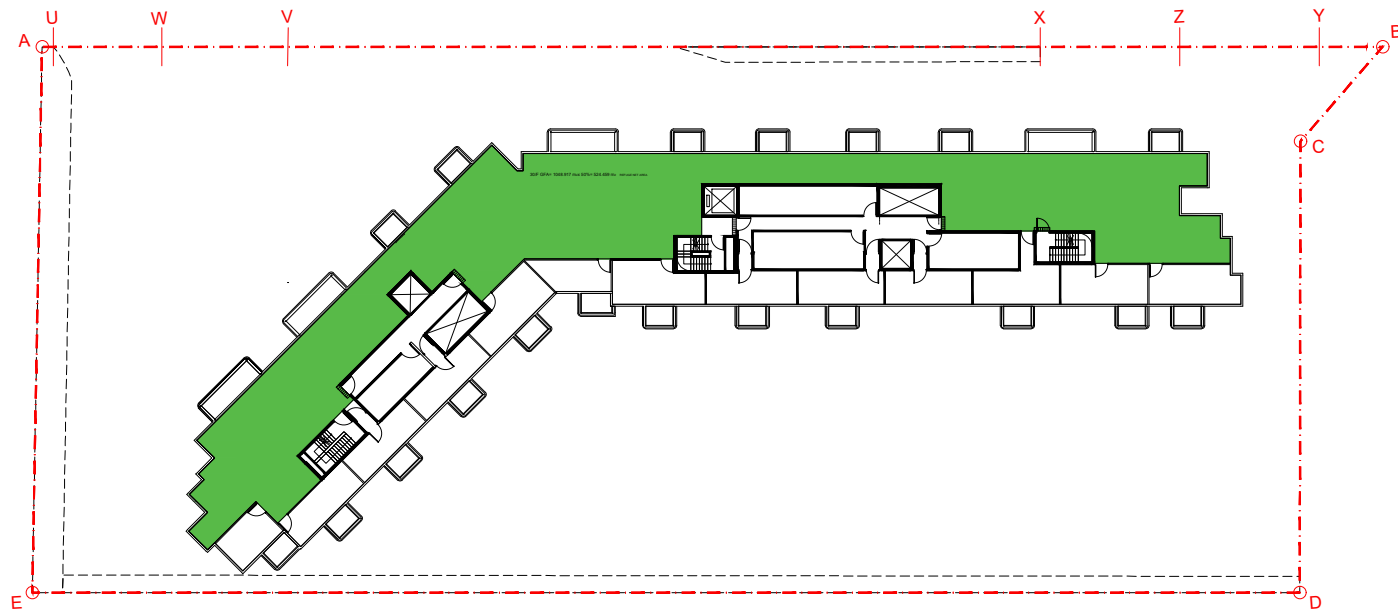
Remarks:

- (1) Exempted from plot ratio calculation.
(2) Referring to the covered portion of the PTT only.
(3) **Excluding transfer plate.**

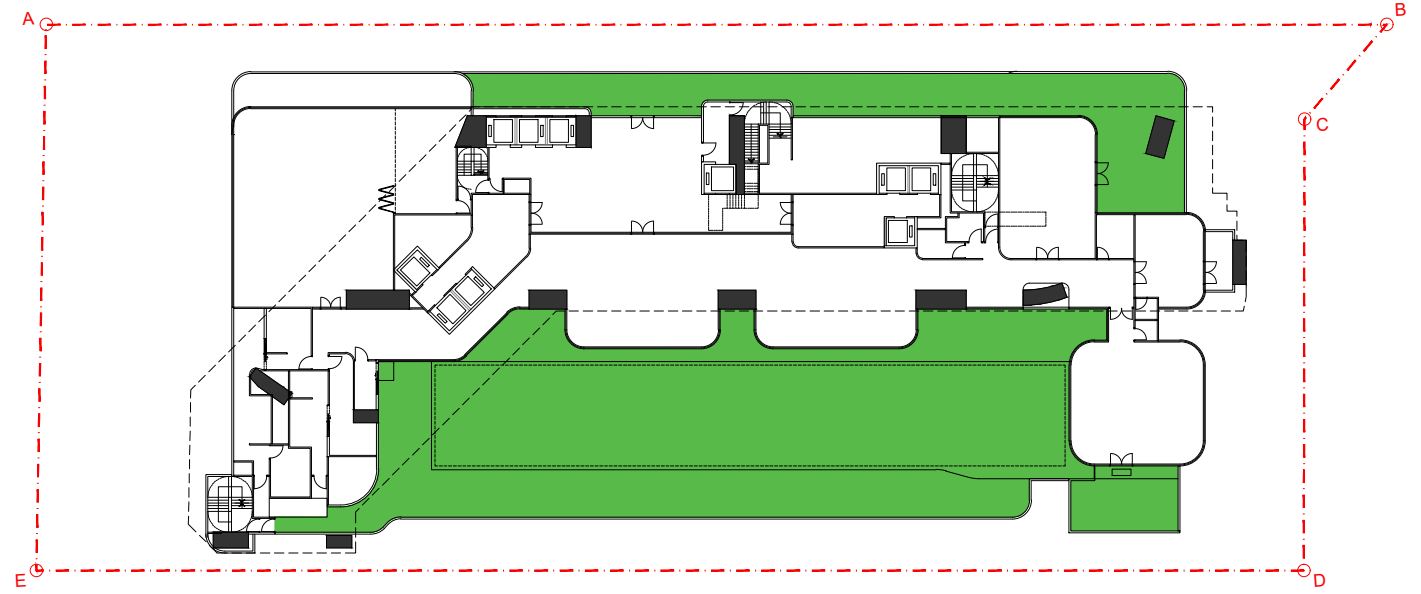
Changes highlighted in bold and italic.

Attachment B

Open Space Demarcation Plan



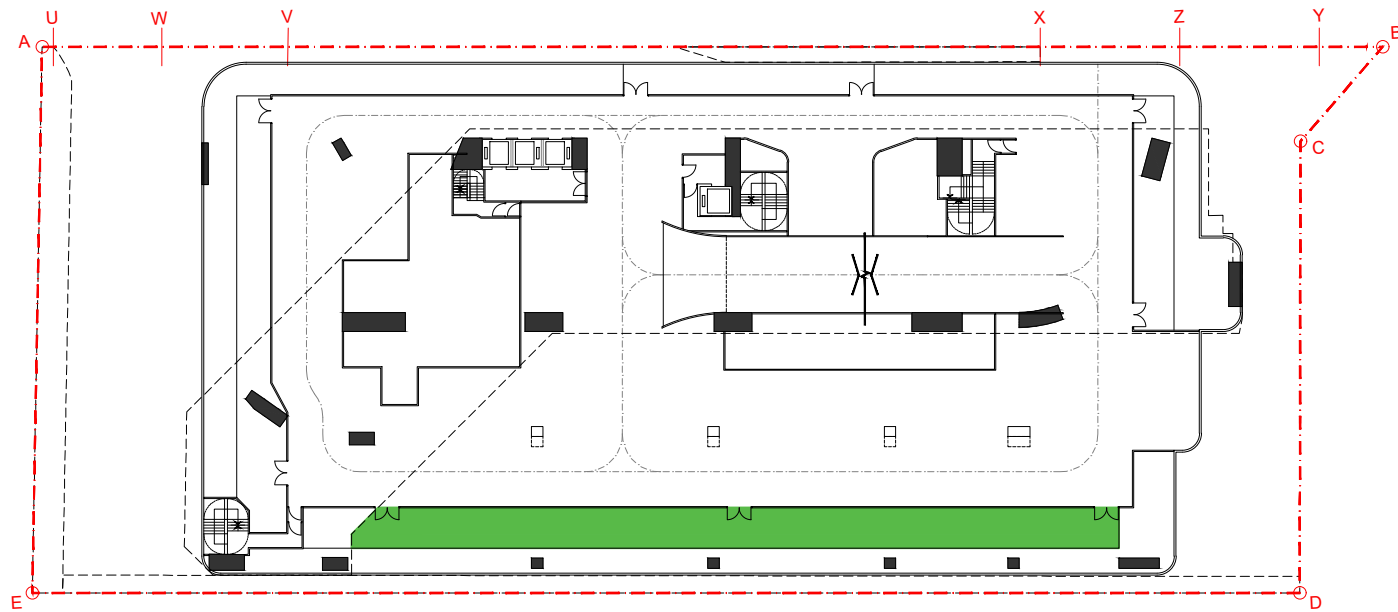
OPEN SPACE AT R/F = about 524.459 sqm.



OPEN SPACE AT 3/F = about 1076.691sqm.

LEGEND:

OPEN SPACE



OPEN SPACE AT 2/F = about 148.850 sqm.

TOTAL OPEN SPACE
 = 524.459 + 1076.691 + 148.850 sqm.
 =1750 sqm.

Remarks:

1. The location and figure of open space is indicative and for illustration purpose only. The actual provision will be subject to detailed design and revision.

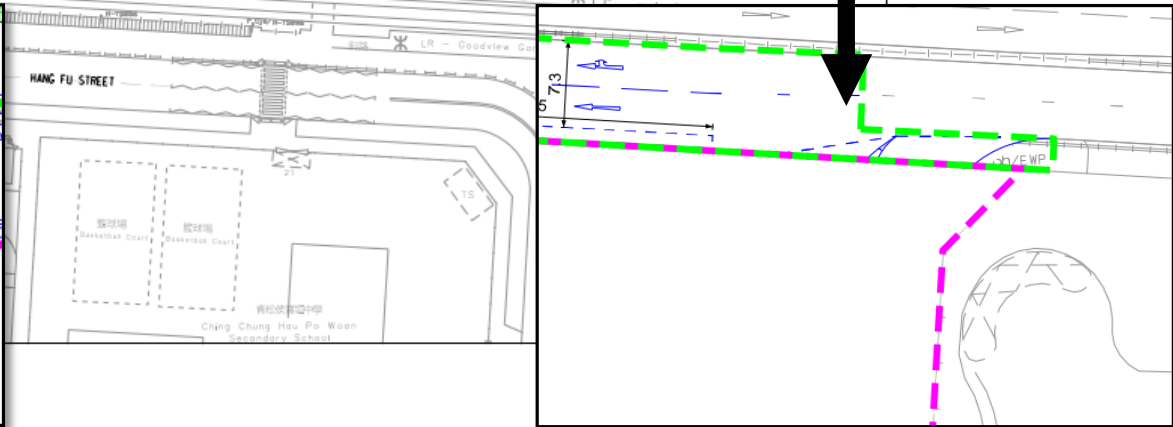
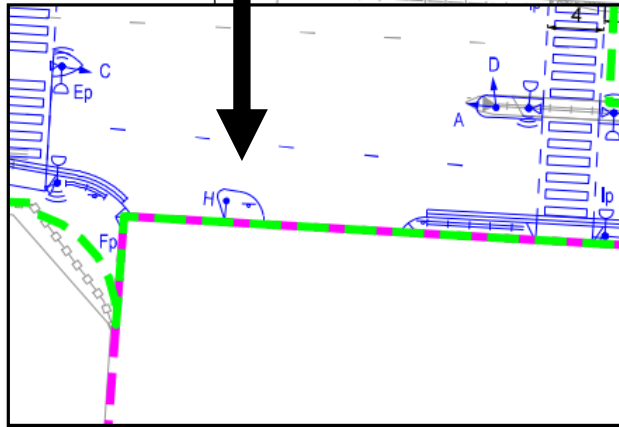
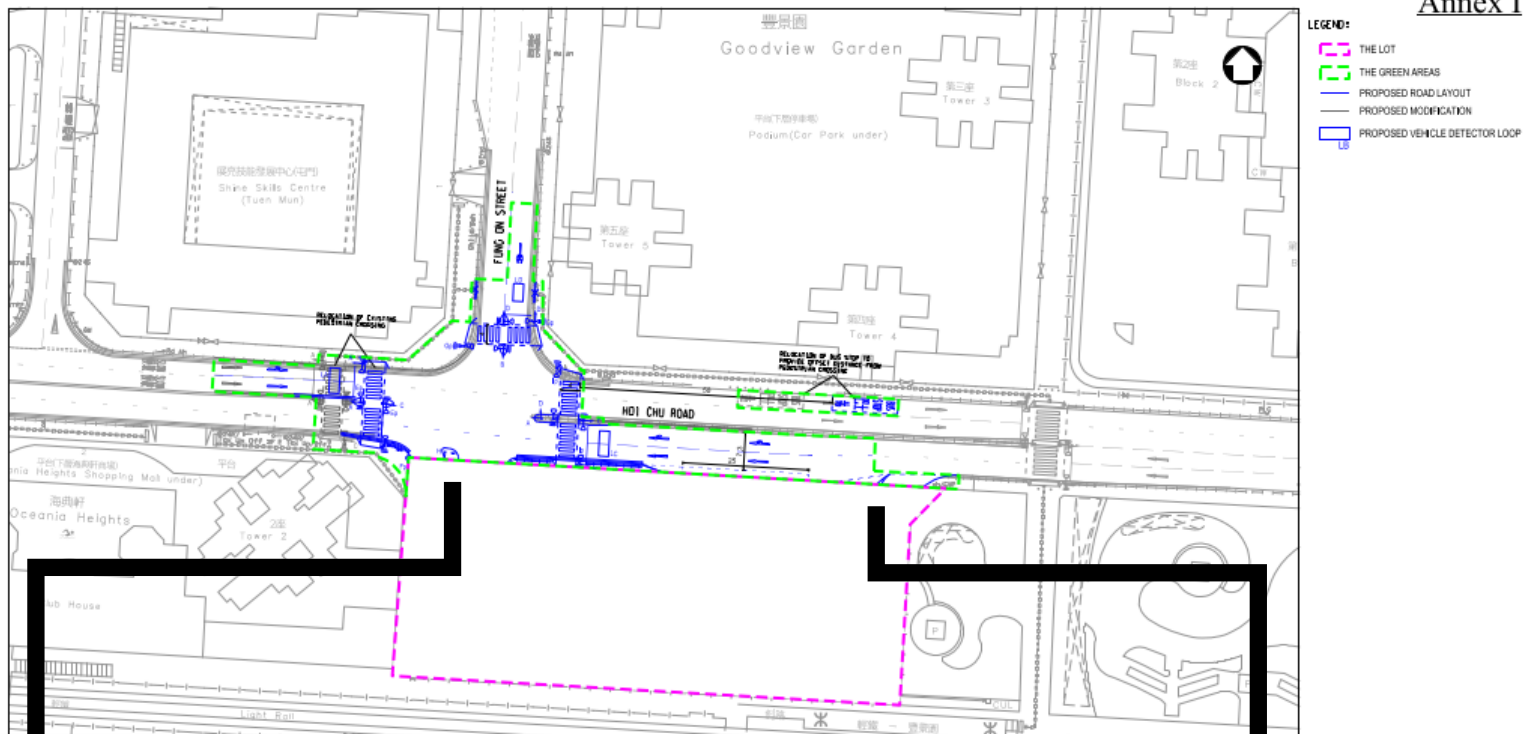
2. Based on the latest average household size by District Council District published by Census and Statistics Department, the average household size in Tuen Mun is 2.5 in Year 2025. With total 700 units in the proposed development, the estimated population is about 1,750 persons.

Source:
https://www.censtatd.gov.hk/en/web_table.html?id=130-06806

Attachment C

Reference Material from OZP Amendment and Lease

Annex I



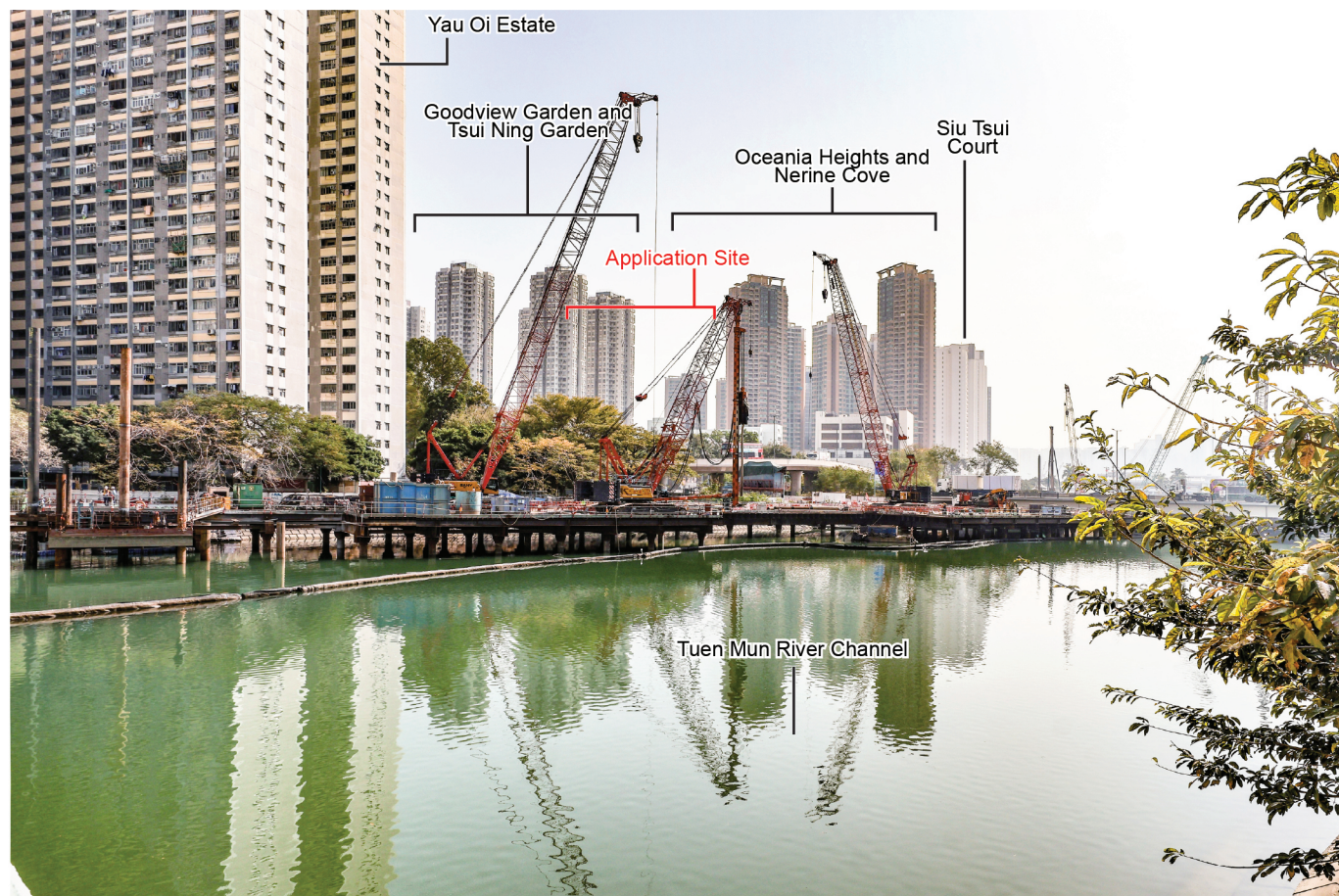
Title

Annex 1 of Land Lease of Tuen Mun Town Lot No. 569

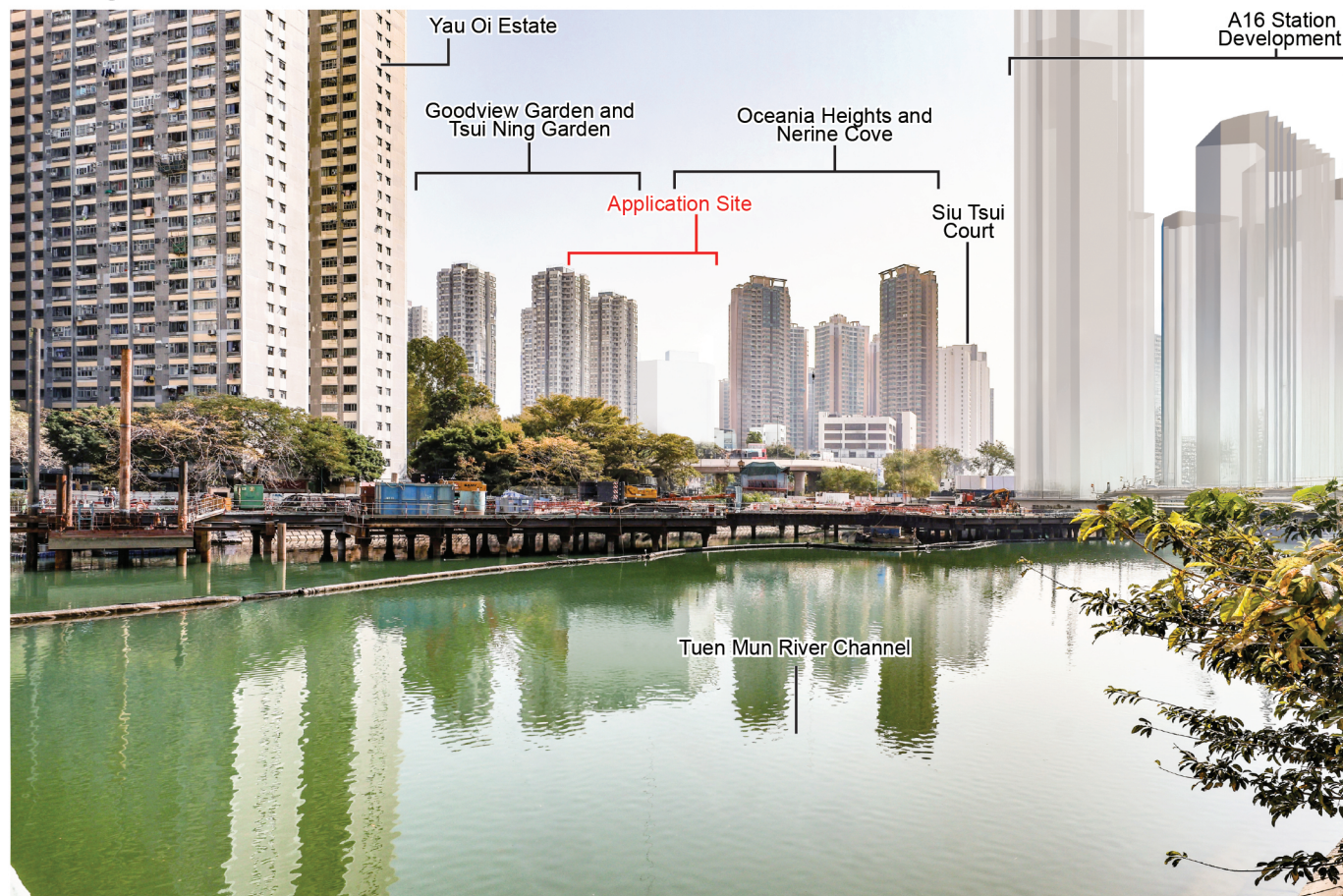
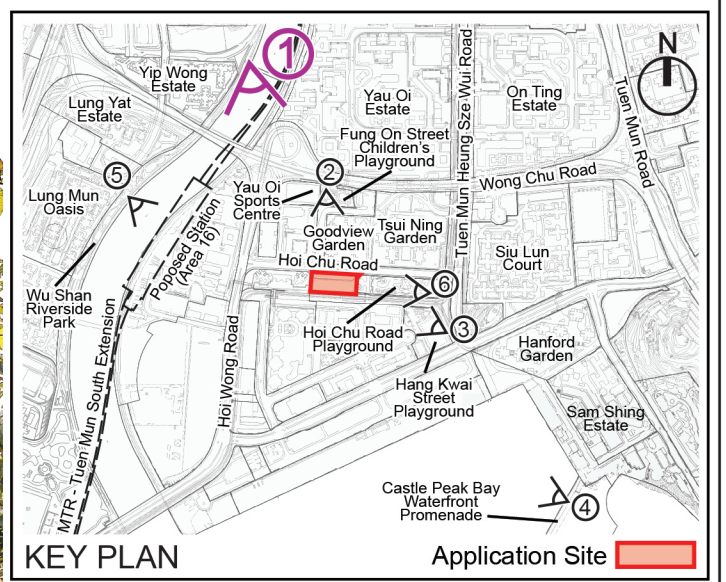
Checked		Drawn	
Rev		Date	
Scale		Figure	

Attachment D

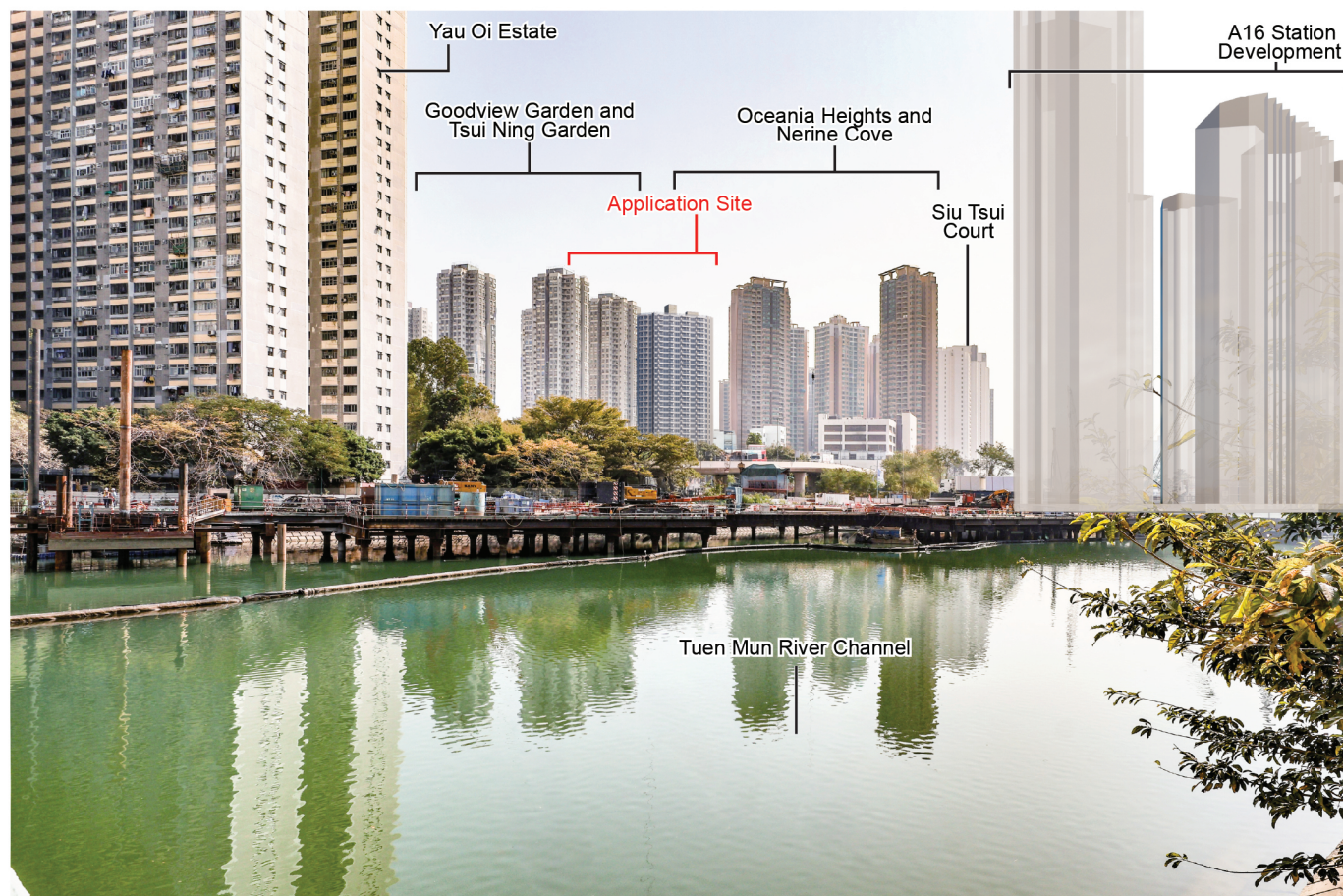
Updated Photomontages



Existing Condition



Approved GBP Scheme



Proposed Scheme



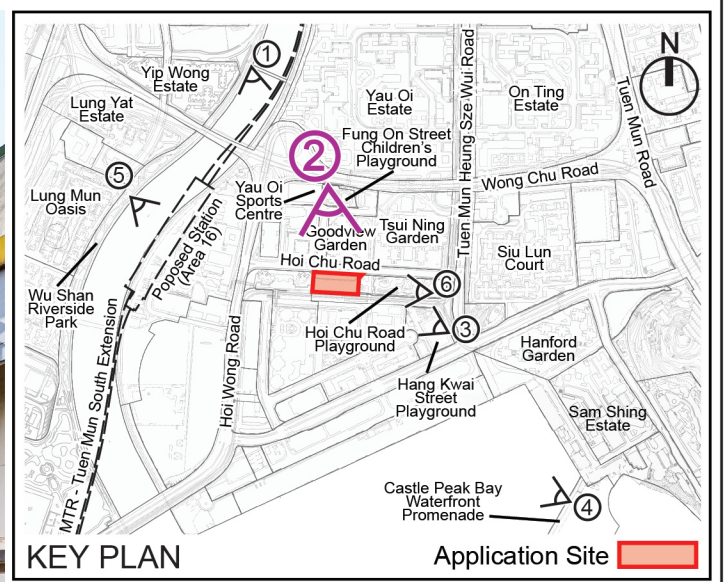
Existing Condition



Approved GBP Scheme



Proposed Scheme





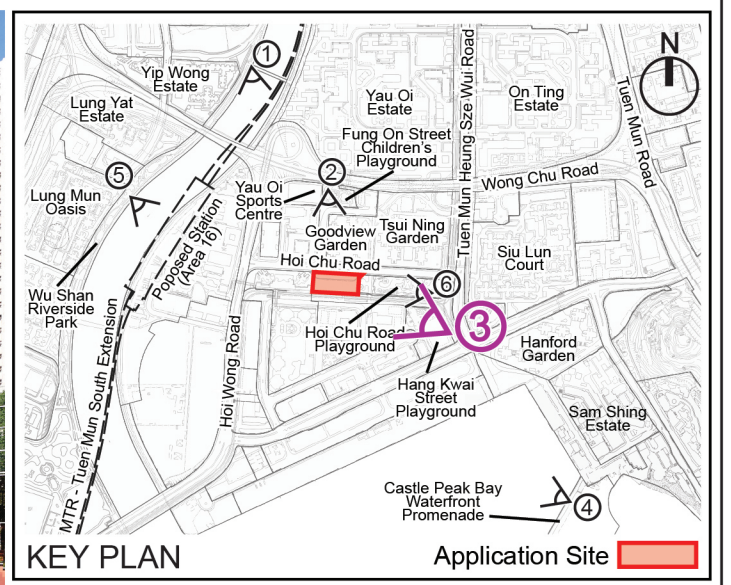
Existing Condition



Approved GBP Scheme



Proposed Scheme





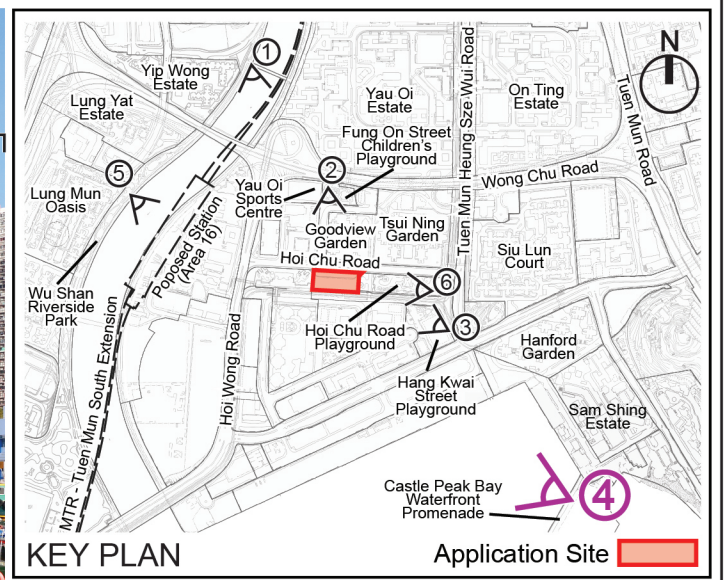
Existing Condition



Approved GBP Scheme

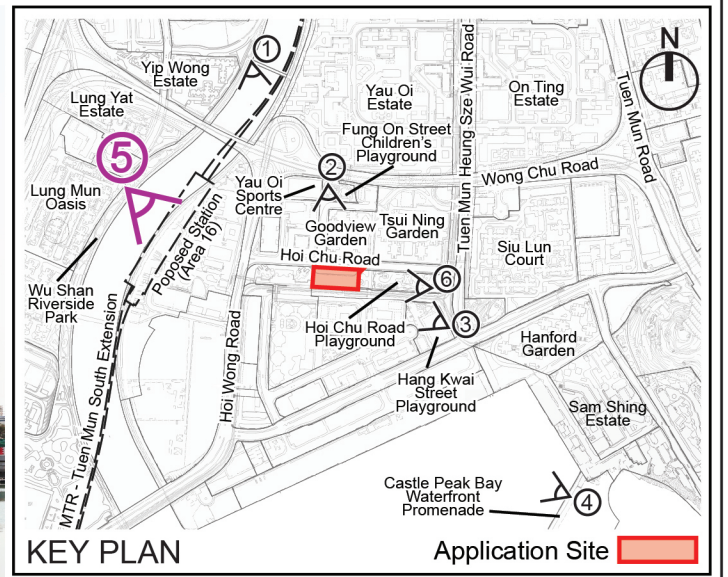


Proposed Scheme



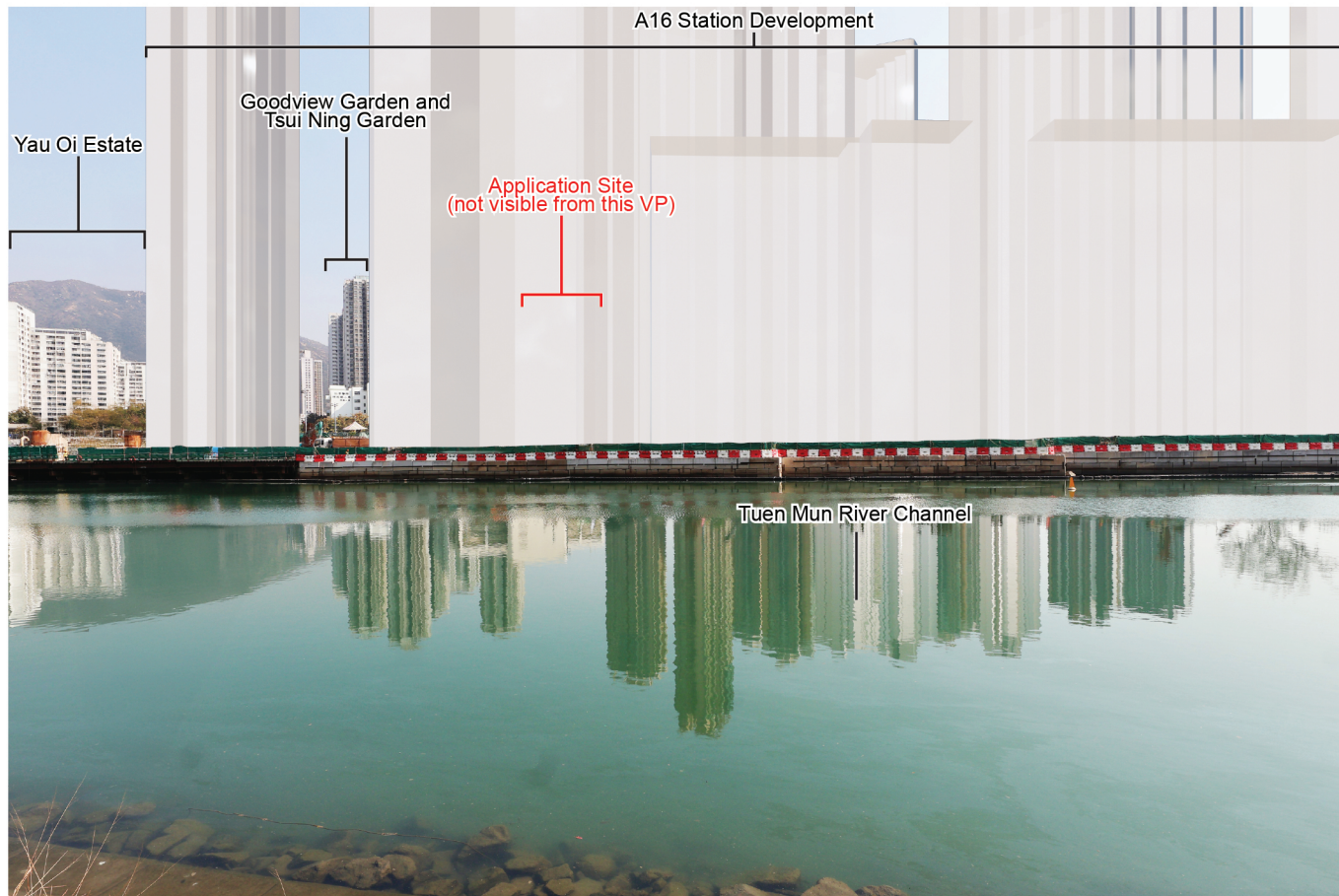


Existing Condition

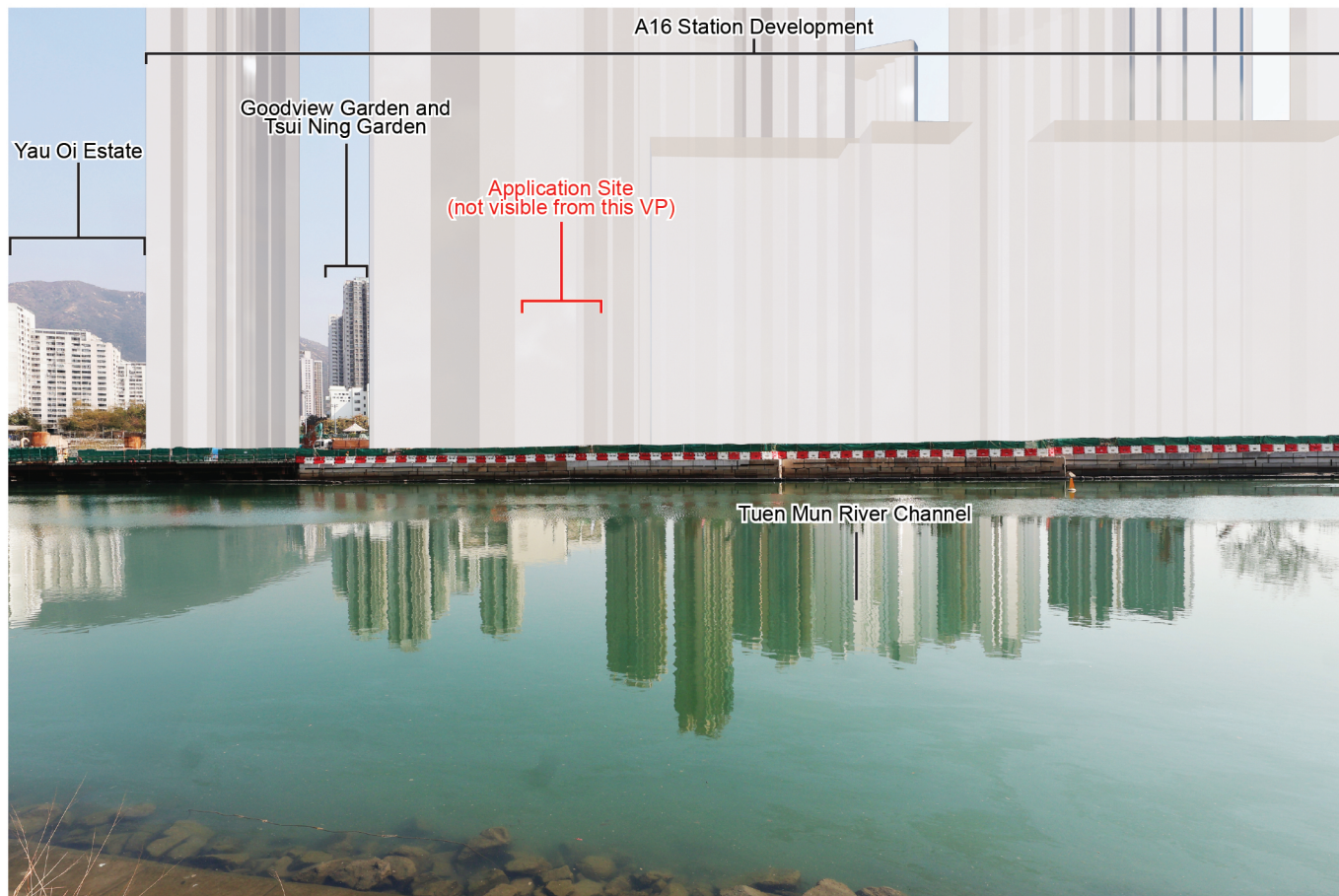


KEY PLAN

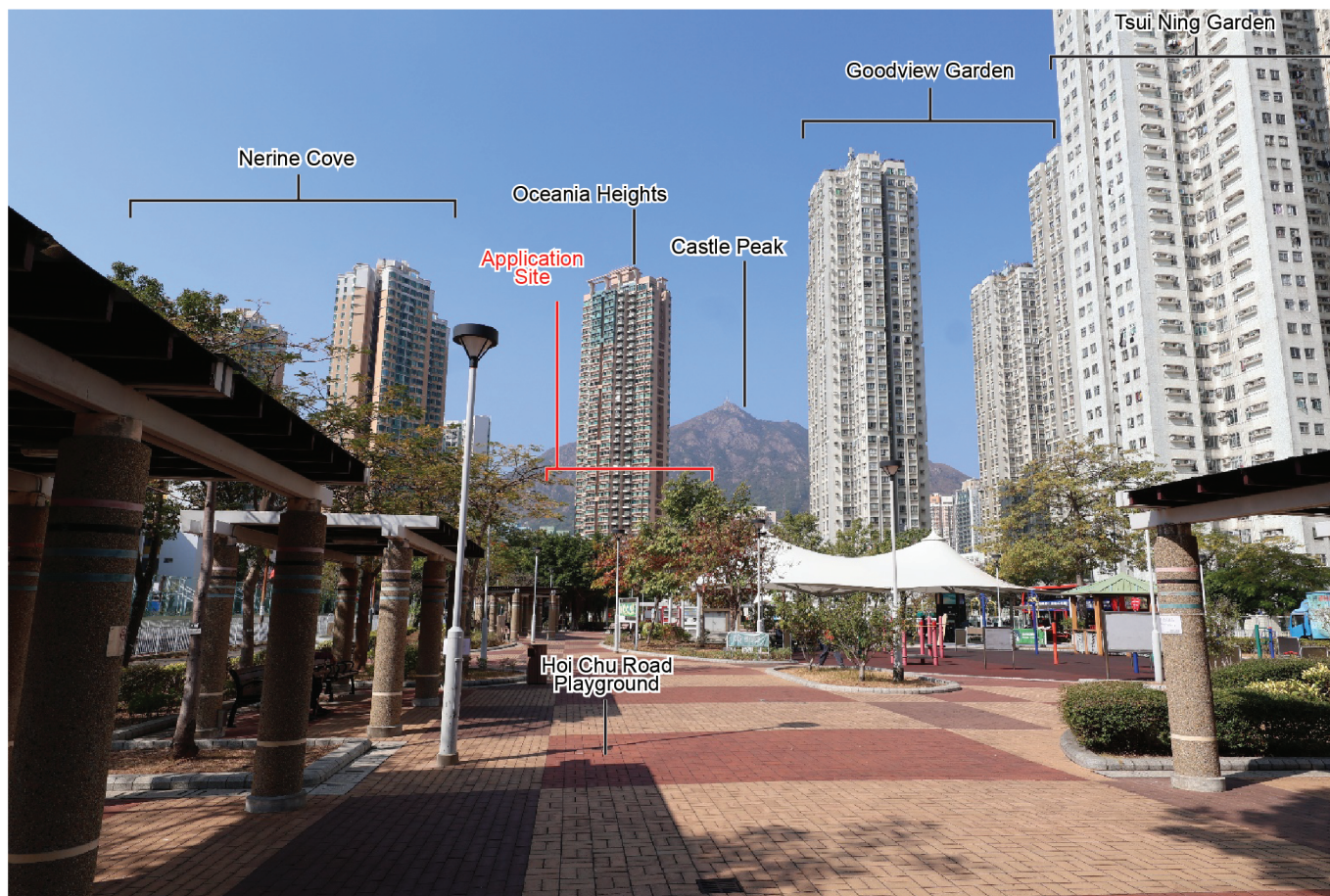
Application Site



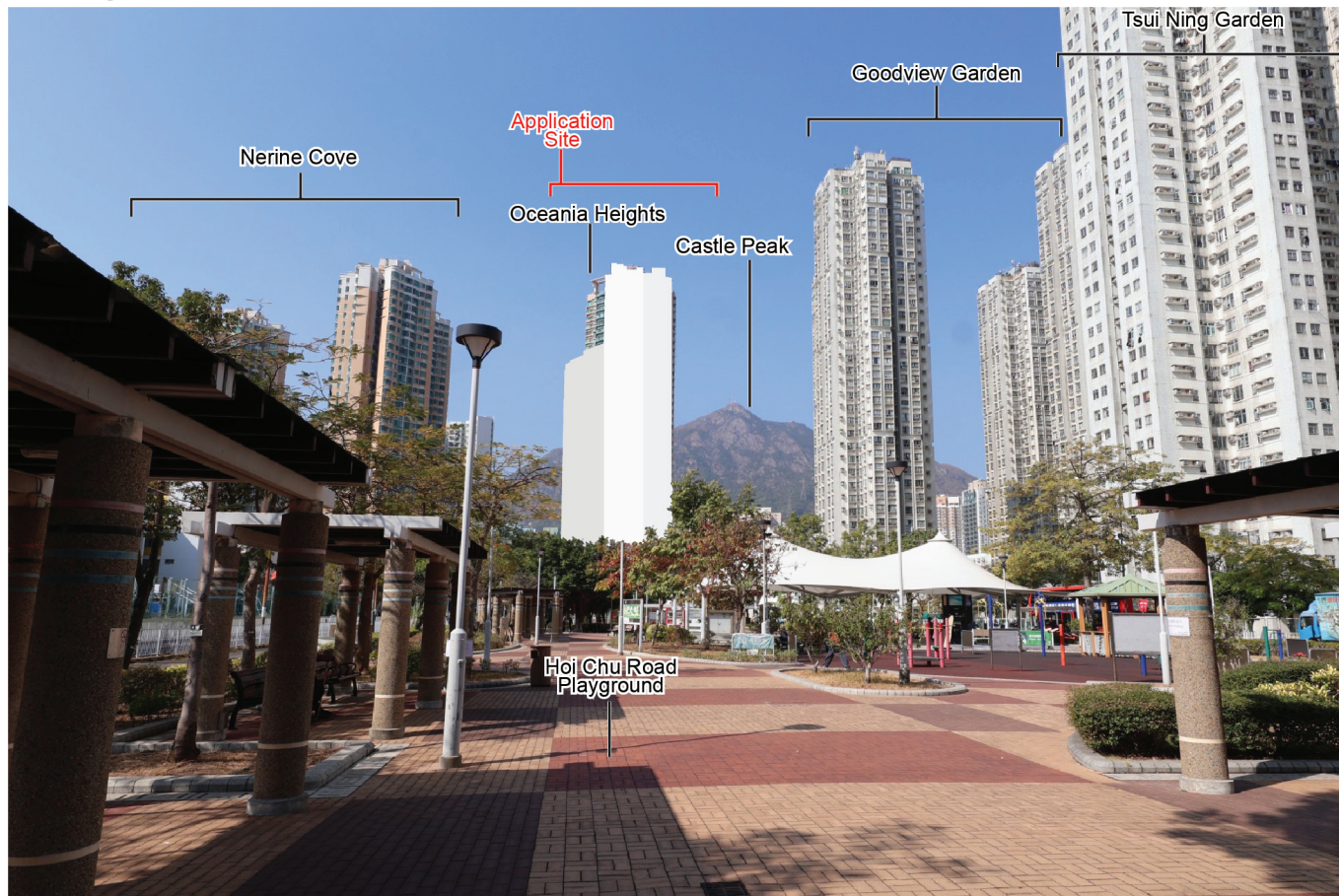
Approved GBP Scheme



Proposed Scheme



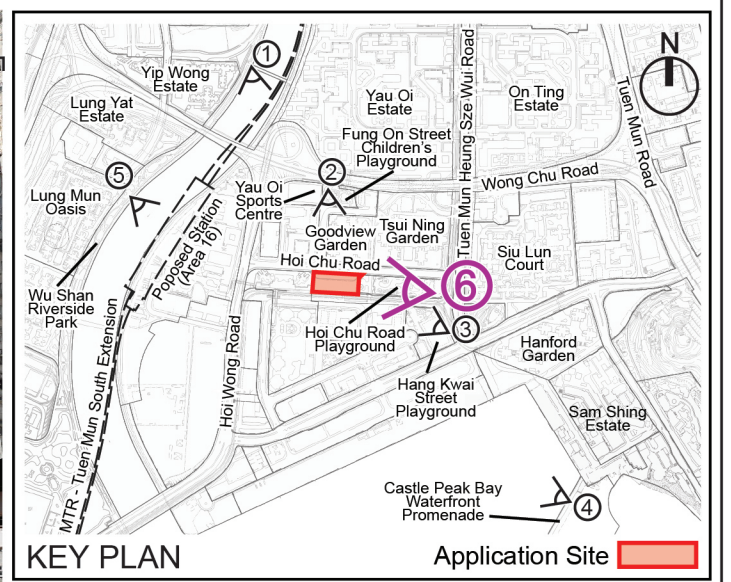
Existing Condition



Approved GBP Scheme



Proposed Scheme



KEY PLAN

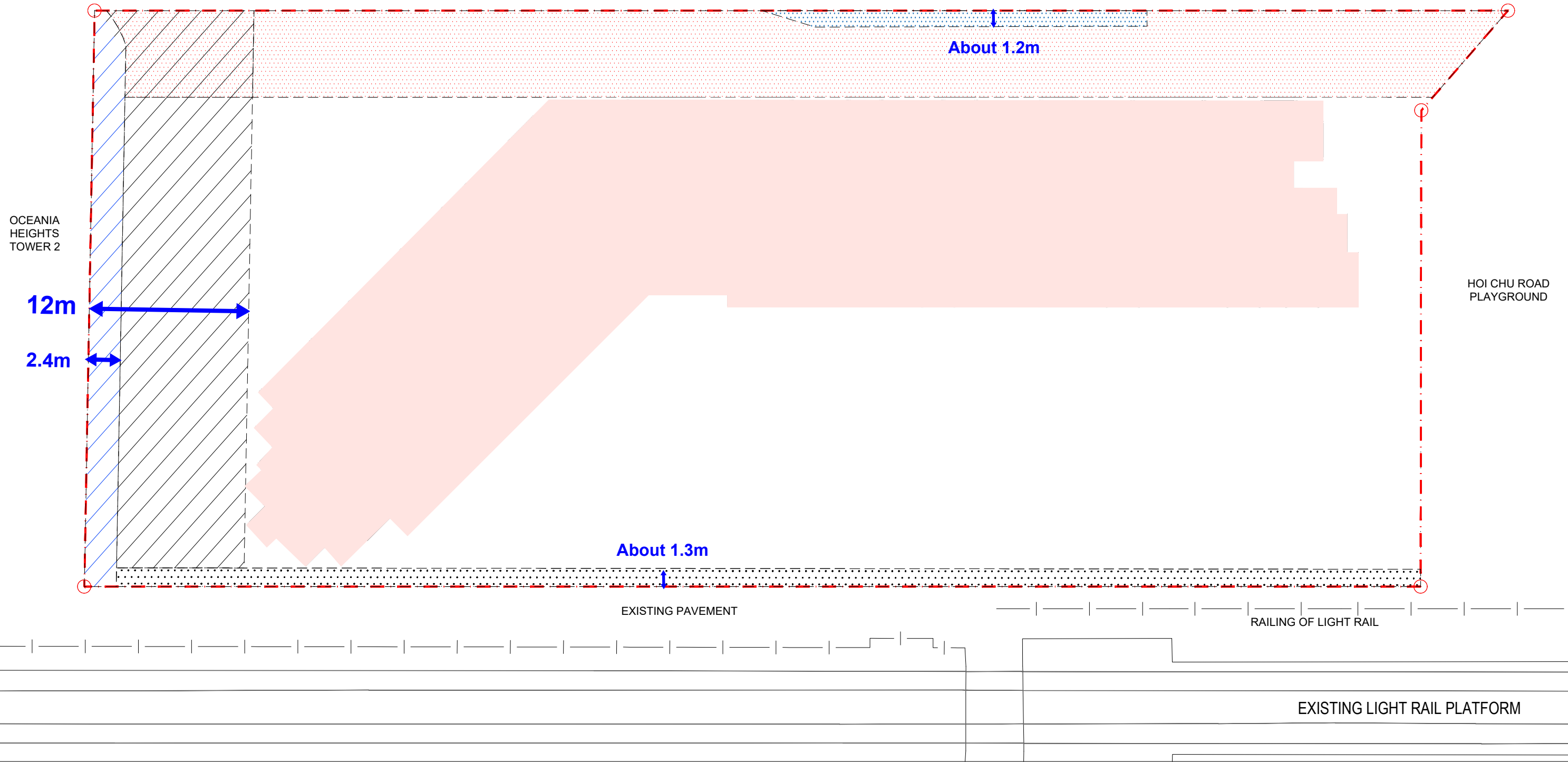
Application Site

Attachment E

Non-building Areas, Building Separations and Design Constraints

LEGEND:

- RESIDENTIAL
- PINK HATCHED BLACK AREA (NON-BUILDING AREA ABOVE LEVEL OF 23 METERS)
- PINK HATCHED BLUE AREA (NON-BUILDING AREA)
- PINK STIPPLED BLACK AREA (NON-BUILDING AREA)
- PINK STIPPLED BLUE AREA (NON-BUILDING AREA)
- PINK STIPPLED RED AREA (AIR SENSITIVE ZONE)



NON-BUILDING AREA & AIR SENSITIVE ZONE UNDER LEASE

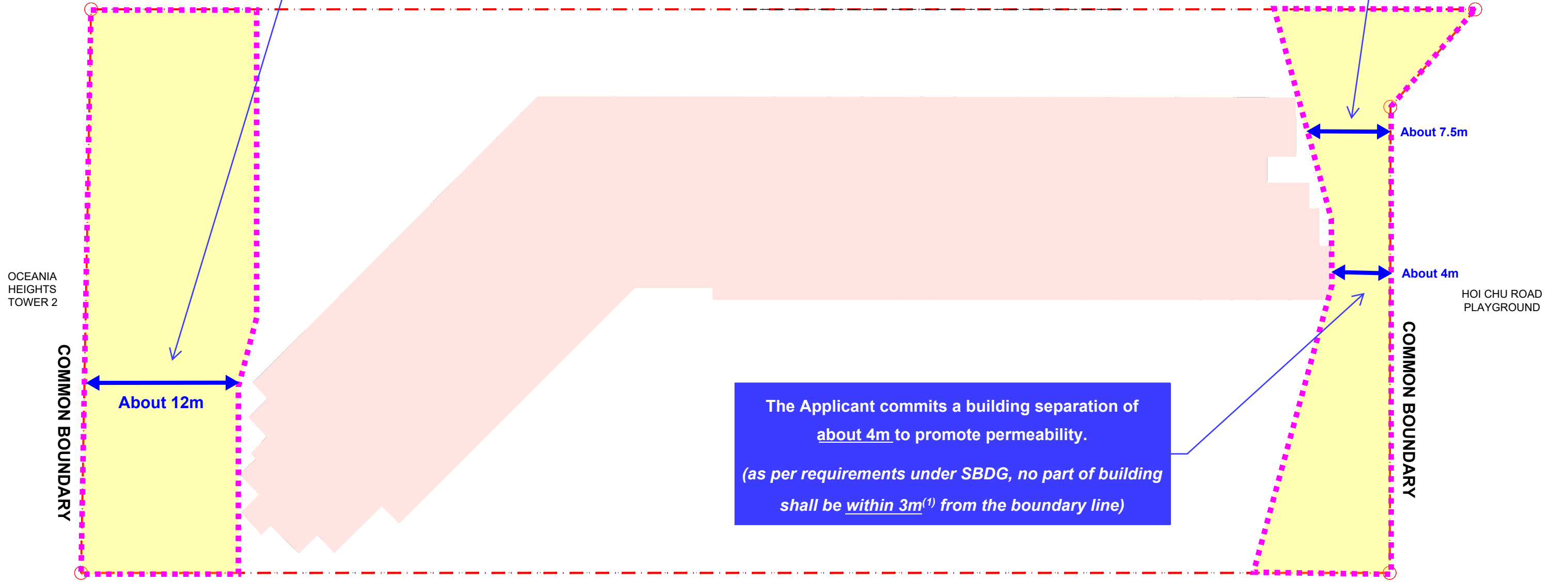
LEGEND:

RESIDENTIAL

Remark (1): To comply with requirements under SBDG, the mean distance of building separation from common boundary (i.e. yellow area divided by length) shall be more than or equal to 7.5m, while the minimum distance shall be 3m. Therefore, the separation distance along the eastern common boundary may vary. Refer to PNAP APP-152 Appendix B Clause 4.2 for details.

The Applicant commits a full-height building separation of about 12m to promote permeability.
This would also help to comply with the 20% permeability requirement under SBDG.

Mean width of min. 7.5m⁽¹⁾ separation to comply with requirements under SBDG, which limits the building footprint.



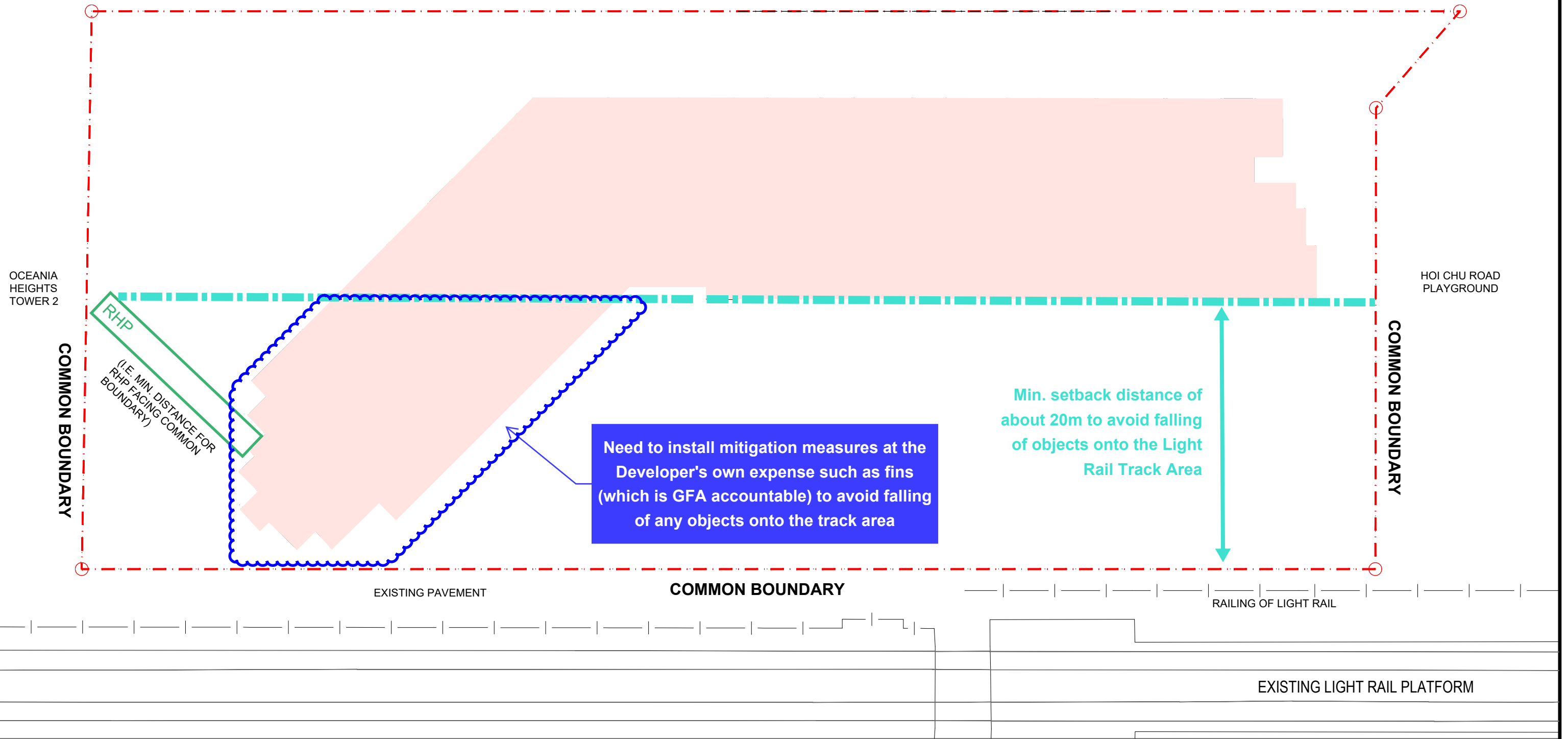
The Applicant commits a building separation of about 4m to promote permeability.
(as per requirements under SBDG, no part of building shall be within 3m⁽¹⁾ from the boundary line)

BUILDING SEPARATIONS

LEGEND:

RESIDENTIAL

RECTANGULAR HORIZONTAL PLANE (RHP) FOR PRESCRIBED WINDOW



DESIGN CONSTRAINTS OF TOWER FOOTPRINT