Section 16 Planning Application for Proposed Minor Relaxation of Building Height Restriction for Tuen Mun A16 Station Package One Property Development for Permitted Flat Use in "Other Specified Uses (Commercial/Residential Development with Public Transport Interchange)" Zone

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TABLE OF CONTENTS

Page

Executive Summary **ES1**
中文摘要 **ES3**

1. INTRODUCTION..... 1
1.1 Background..... 1
1.2 Report Structure..... 2

2. SITE AND PLANNING CONTEXT..... 3
2.1 Site and Surrounding Context..... 3
2.2 Planning and Policy Context..... 3

3. INDICATIVE DEVELOPMENT SCHEME..... 5
3.1 Indicative Development Scheme..... 5
3.2 Comparison with BH Restriction of OZP..... 7
3.3 Design Constraints of Proposed Scheme..... 7
3.4 Design Merits of the Proposed Scheme..... 7
3.5 Mechanism to Safeguard Urban Design Concepts..... 8

4. TECHNICAL CONSIDERATIONS.....10
4.1 Visual Appraisal.....10
4.2 Other Considerations.....15

5. DEVELOPMENT JUSTIFICATIONS AND MERITS..... 16
5.1 Proposed Scheme is in Line with the Government's Policy of Facilitating Aboveground Carpark Design for Private Development.....16
5.2 Proposed Minor Relaxation of Building Height is for the Incorporation of Aboveground Carparks only.....16
5.3 Magnitude of Increase in Building Height is Minor.....17
5.4 In Line with the Urban Design Concept of Tuen Mun.....18
5.5 No Significant Changes in Visual Aspects.....18
5.6 Marine Deposit Layer Found 5m Below Ground Level Unfavour to Underground Carpark.....18
5.7 Design Merits are Proposed.....18
5.8 No Other Technical Impacts Anticipated.....19

6. CONCLUSION.....20

List of Tables

		Page
Table 3.1	Indicative Development Parameters	6
Table 3.2	Proposed Minor Relaxation of BH Restriction	7

List of Figures

		Following Page
Figure 1.1	Extract of the Draft Tuen Mun Outline Zoning Plan No. S/TM/42	1
Figure 1.2	Extract from Detailed Boundary Plan for Site A Approved by LandsD dated 05 May 2026 for Tuen Mun Town Lot No.576	1
Figure 3.1	Indicative Section A'-A"	6
Figure 3.2	Indicative Section B'-B'	6
Figure 3.3	Indicative G/F Plan	6
Figure 3.4	Indicative 1/F Plan	6
Figure 3.5	Indicative 2/F Plan	6
Figure 3.6	Indicative 3/F Plan	6
Figure 3.7	Indicative 4/F Plan	6
Figure 3.8	Design Constraints	6
Figure 3.9	Design Merits (Plan)	9
Figure 3.10	Design Merits (Sections)	9
Figure 4.1	Aerial Photo of Tuen Mun South	14
Figure 4.2	Visual Envelope and Viewpoints	14
Figure 4.3	Photomontage of Viewpoint 1: View Southwest from Tuen Mun Park	14
Figure 4.4	Photomontage of Viewpoint 2: View West from Hoi Chu Road Footpath	14
Figure 4.5	Photomontage of Viewpoint 3: View Northwest from Hoi Wong Road	14
Figure 4.6	Photomontage of Viewpoint 4: View Southeast from Wu Shan Riverside Park	14
Figure 4.7	Photomontage of Viewpoint 5: View Southeast from Castle Peak Hiking Trail	14
Figure 4.8	Photomontage of Viewpoint 6: View Northeast from the Entrance of Wu Shan Recreation Playground	14
Figure 4.9	Photomontage of Viewpoint 7: View Southwest from Footbridge across the Tuen Mun River Channel near Yau Oi Estate	14
Figure 4.10	Photomontage of Viewpoint 8: View Northwest from Castle Peak Bay Waterfront Promenade	14
Figure 4.11	Photomontage of Viewpoint 9: View Northwest from Tuen Mun Promenade	14
Figure 4.12	Photomontage of Viewpoint 10: View Southwest from Tuen Mun River (Eastern Bank) Garden	14

EXECUTIVE SUMMARY

This subject planning application is submitted to the Town Planning Board (the Board) in support of the proposed minor relaxation of building height (BH) restriction for Tuen Mun A16 Station Package One Property Development in Tuen Mun Area 16 (hereafter referred to as **the Application Site**) for permitted flat use in "Other Specified Uses" annotated "Commercial/Residential Development with Public Transport Interchange" ("OU(C/R with PTI)") zone on the Draft Tuen Mun Outline Zoning Plan (OZP) No. S/TM/42 under Section 16 (S16) of the Town Planning Ordinance (The Ordinance) (CAP.131).

Following the announcement in the 2025 Policy Address, the Government promulgated the enhanced GFA exemption arrangements for carparks in private development projects in November 2025 to allow full GFA exemption for no more than two storeys of aboveground carparks, while eliminating the prerequisite of constructing some of the carparks 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 BH relevant to the aboveground carparks. The above measures have already taken effect starting from November 2025.

The Application Site is subject to a maximum building height restriction of 174mPD under the OZP. In response to the above mentioned policy initiative, the current planning application proposes a minor relaxation of BH restriction for Package One which consists of Tower 10 (T10) and Tower 11 (T11) from 174mPD to 174.25mPD (+0.25m or +0.14%) and 177.4mPD (+3.4m or +1.95%) respectively.

The subject planning application is supported by the following justifications and merits:

- the Proposed Scheme is in line with the Government's policy of facilitating aboveground carpark arrangement for private developments;

- the proposed minor relaxation of building height restriction is for the incorporation of the aboveground carparks only;

- the proposed magnitude of increase in building height is minor;

- the Proposed Scheme with a minor increase in building height, is in line with the urban design concept of the Tuen Mun Area with air ventilation / view corridor preserved and the stepped height concept descending from the east to the west towards the riverfront of Tuen Mun River Channel maintained;

- the Proposed Scheme has no significant change in visual aspects;

- the Ground Investigation result of the application site indicates the presence of marine deposits soil stratum at approximately 5m below ground level, and the thickness varies from 8m to 17m. The basement construction within this weak marine deposit layer should be avoided;

- design merits have been proposed; and

- no other technical impacts are anticipated, as the Proposed Scheme conforms to the planning intention, land uses and maximum GFA restrictions of the OZP.

In light of the supporting 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異時，應以英文原文為準。)

申請人現根據香港法例第131章《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」）呈交規劃申請，以支持放寬屯門第16區站第一期物業發展項目（下稱「申請地點」）的建築物高度限制。該申請地點在《屯門分區計劃大綱草圖》編號 S/TM/42上被劃為「其他指定用途」註明「商業 / 住宅發展暨公共交通交匯處」地帶，「分層住宅」為經常准許用途。

緊隨2025年施政報告的公布，政府於2025年11月公布了優化私人發展項目停車場總樓面面積（GFA）豁免的安排，容許不超過兩層的地面以上停車場獲得全數總樓面面積豁免，同時取消了必須將部分停車場建於地下的先決條件。與此同時，為配合上述優化安排的落實，政府亦會簡化審批地面停車場高度限制的城規程序，以批准放寬與興建地面停車場相關的建築物高度限制。上述措施已於2025年11月起生效。

申請地點受限於分區計劃大綱圖所訂明的最高建築物高度限制主水平基準以上174米。為響應上述政策倡議，申請人現呈交規劃申請，建議將第一期物業發展項目，即第T10座及第T11座的建築物高度限制，分別由主水平基準以上174米放寬至174.25米（增加0.25米及0.14%），以及由主水平基準以上174米放寬至177.4米（增加3.4米及1.95%）。

以下為支持是次規劃申請的發展理據及增益：

- 擬議方案符合政府優化私人發展項目設置地面停車場總樓面面積獲豁免的政策;
- 擬議輕微放寬建築物高度限制僅為了容納地面以上停車場；
- 擬議方案建築物高度增幅較小；
- 擬議方案雖輕微增加建築物高度，但符合屯門區的城市設計概念。項目保留了通風廊 / 景觀廊，並維持了由東向西朝向屯門河道沿岸遞減的梯級式的高度輪廓；
- 擬議方案在視覺層面上並無顯著改變；
- 申請地點的土地勘測結果顯示，地下約5米處存在海泥沉積層，其厚度在8米至17米

之間，因此應避免在鬆軟的海泥沉積層內進行地庫施工；

- 申請人提出了設計增益； 及

- 擬議方案符合分區計劃大綱圖的規劃意向、土地用途及總樓面面積上限，預計不會帶來其他技術性影響。

基於以上理據，現懇請城規會接納是次規劃申請。

1. INTRODUCTION

1.1 Background

1.1.1 This planning application is submitted to the Town Planning Board (the Board) in support of the proposed minor relaxation of building height (BH) restriction for Tuen Mun A16 Station Package One Property Development in Tuen Mun Area 16 (hereafter referred to as the Application Site) for permitted flat use in “Other Specified Uses” annotated ‘‘Commercial/Residential Development with Public Transport Interchange’’ (‘‘OU(C/R with PTI)’’) zone on the Draft Tuen Mun Outline Zoning Plan (OZP) No. S/TM/42 under Section 16 (S16) of the Town Planning Ordinance (the Ordinance) (CAP. 131) (**Figure 1.1** and **Figure 1.2** refer).

1.1.2 Following the announcement in the 2025 Policy Address, the Government promulgated the enhanced GFA exemption arrangements for carparks in private development projects in November 2025 to allow full GFA exemption for no more than two storeys of aboveground carparks, while eliminating the prerequisite of constructing some of the carparks 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 BH relevant to the aboveground carparks. The above measures have already taken effect starting from November 2025.

1.1.3 The Application Site is subject to a maximum building height restriction of 174mPD under the OZP. In response to the above mentioned policy initiative, the current planning application proposes a minor relaxation of BH restriction for Package One which consists of Tower 10 (T10) and Tower 11 (T11) from 174mPD to 174.25mPD (+0.25m or +0.14%) and 177.4mPD (+3.4m or +1.95%) respectively. These changes in BH are solely attributable to the incorporation of the aboveground carparks design into the permitted residential development on the Application Site.

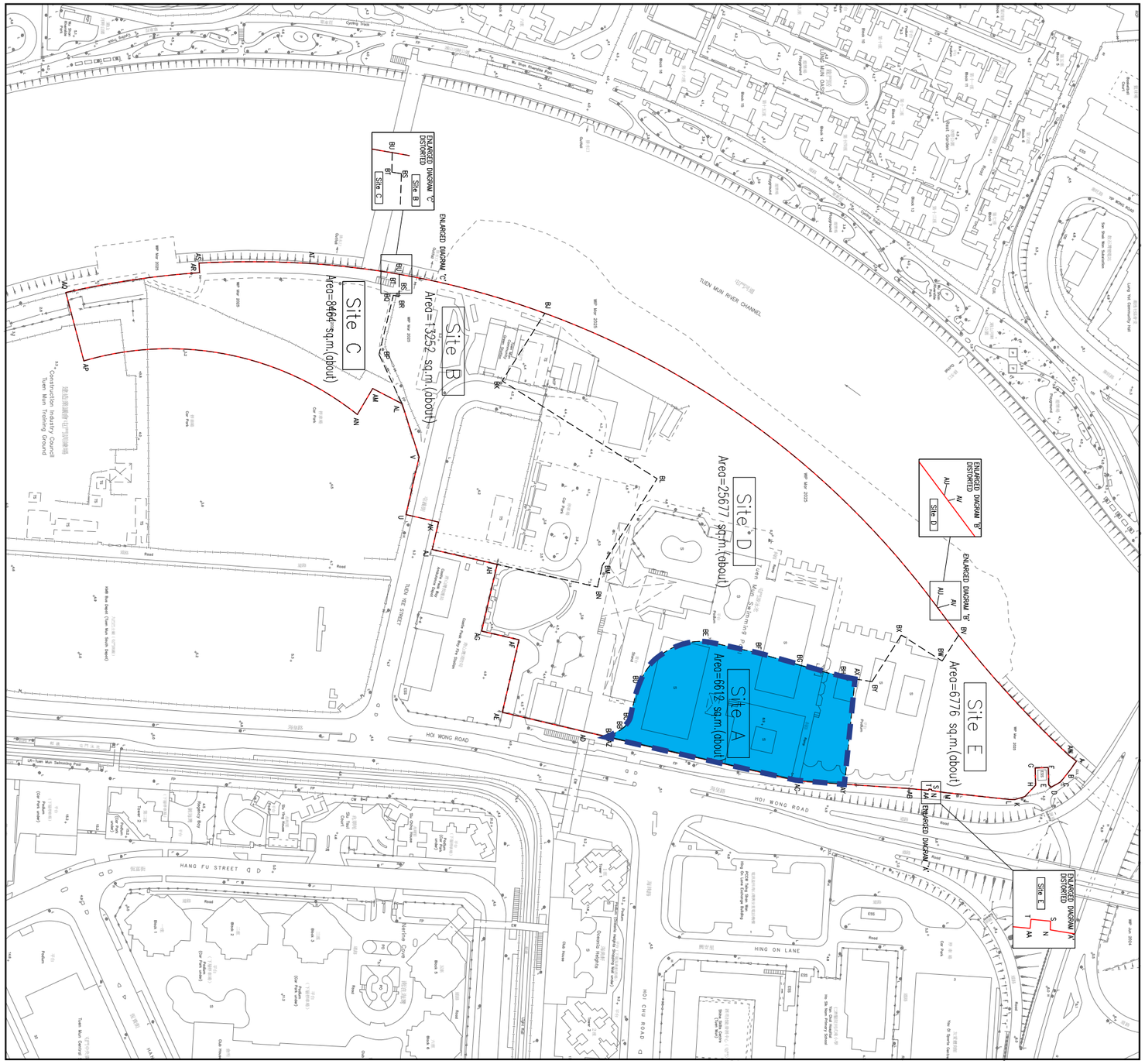
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Application Site
(Package One Property Development)

Drawing Title **FIGURE 1.1 - EXTRACT OF DRAFT TUEN MUN OUTLINE ZONING PLAN NO. S/TM/42**	Scale **1:10000** Date **OCTOBER 2026**	Project **PROPOSED MINOR RELAXATION OF BUILDING HEIGHT RESTRICTION AT PACKAGE ONE PROPERTY DEVELOPMENT AT TUEN MUN AREA 16**	Job No. **A-2601**

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Legend

Application Site
(Package One Property Development)

Drawing Title **FIGURE 1.2 - EXTRACT FROM DETAILED BOUNDARY PLAN FOR SITE A APPROVED BY LANDSD DATED 05 MAY 2026 FOR TUEN MUN TOWN LOT NO.576**	Scale **1:2500** Date **OCTOBER 2026**	Project **PROPOSED MINOR RELAXATION OF BUILDING HEIGHT RESTRICTION AT PACKAGE ONE PROPERTY DEVELOPMENT AT TUEN MUN AREA 16**	Job No. **A-2601**

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1.2 Report Structure

1.2.1 This planning statement includes the following sections:

Section 2: describes and analyses the Application Site, surrounding context, policy and planning context;

Section 3: depicts the indicative development scheme;

Section 4: summarises the technical considerations;

Section 5: highlights the justifications of the Proposed Scheme; 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 Tuen Mun A16 Station Package One Property Development (**Figure 1.2** refers) and has a total site area of about 6,612m^2. The main entrance access to the Application Site is from Hoi Wong Road and Tuen Yee Street. The high-density private housing, such as Oceania Heights and Nerine Cove, are across Hoi Wong Road to the east. The area to the west of the Subject Site across Tuen Mun River Channel is also largely dominated by high-density residential developments including Lung Mun Oasis, Glorious Garden, Lung Yat Estate, the Esplanade and Sun Tuen Mun Centre. The Sports Ground proposed by Leisure and Cultural Services Department (LCSD) is to the south of the Subject Site.

2.2 Planning and Policy Context

Enhanced GFA Exemption Arrangements for Carparks

2.2.1 Following the announcement in the latest Policy Address 2025, the Government promulgated the enhanced arrangements in November 2025 to allow full GFA exemption for no more than two levels of the aboveground carparks, while eliminating the prerequisite of constructing some of the carparks underground.

2.2.2 To facilitate the implementation of the enhanced arrangements, in the event that a planning application is required for minor relaxation of BH restriction to accommodate no more than two storeys of the aboveground carparks, a streamlined town planning procedure will be adopted for the relevant planning application in which only a simple visual appraisal would be required. The above measures have taken effect starting from November 2025 in accordance with PNAP APP-2.

Statutory Planning Context and Urban Design Concept for Tuen Mun

2.2.3 The Application Site falls within an area zoned as "OU(C/R with PTI)" on the Draft Tuen Mun OZP No. S/TM/42. According to the Notes of the OZP, the subject "OU(C/R with PTI)" zone is intended primarily for integrated development of the area for commercial and residential uses cum railway facilities and public transport interchange with the provision of riverside promenade, open space and Government, Institution or Community facilities. Development and/or redevelopment within this zone is subject to maximum domestic GFA of 366,678m^2 and non-domestic GFA of 31,100m^2.

2.2.4 According to the Explanatory Statement of the OZP, social welfare facilities of GFA of not less than 6,615m^2 and a Public Transport Interchange of GFA not less than 5,500m^2 shall be provided. The site is subject to a building height restriction of 174mPD.

3. INDICATIVE DEVELOPMENT SCHEME

3.1 Indicative Development Scheme

3.1.1 In response to the policy initiative on enhanced GFA exemption arrangement for aboveground carpark in private development, a Proposed Scheme for Package One Development has been formulated to locate the carpark aboveground.

3.1.2 The podiums are also combined to create a continuous Landscape Area. Under the Proposed Scheme, the Residential Lobby, Loading / Unloading facilities and E&M facilities are located on the Ground Floor. The two-storey Car Park is relocated to aboveground (i.e. First Floor and Second Floor), followed by the Clubhouse on the Third Floor and Landscape Area on the Fourth Floor (**Figures 3.1 to 3.7**).

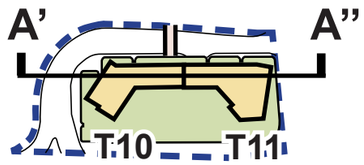
3.1.3 Under the current scheme, a building setback of 3m to 5m along Hoi Wong Road is proposed. The Proposed Scheme will comply with Sustainable Building Design Guidelines under PNAP APP-152 via GBP submission for Buildings Department's approval. The summary table of development parameters is indicated in **Table 3.1** below.

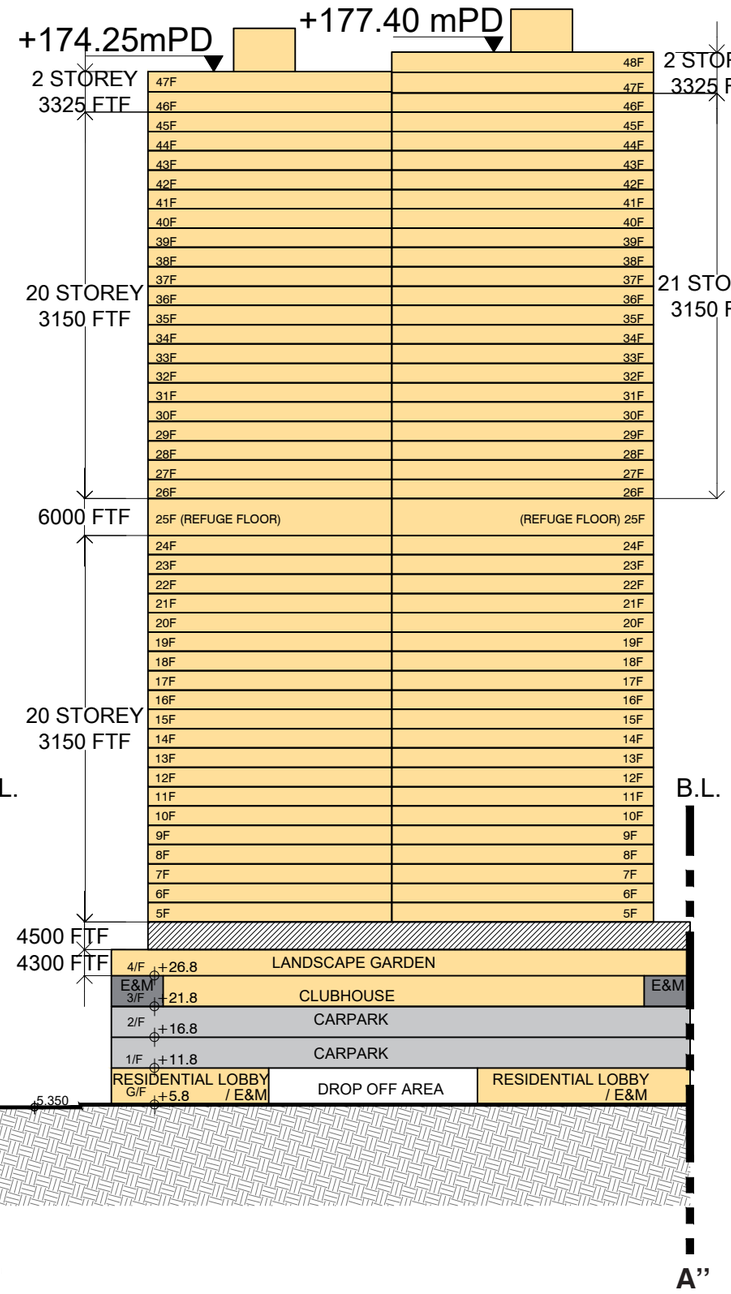
Table 3.1 - Indicative Development Parameters

	Current Scheme / Current Phase
Indicative Development Parameters	
Site Area (About) [(i)]	6,612 m²
Total Gross Floor Area (GFA) [(ii)]	55,847 m²
Domestic GFA	55,847 m²
Non-domestic GFA	N/A
Maximum Building Height (in mPD) [(iii)]	T10: 174.25 mPD
	T11: 177.4 mPD
No. of Storeys	T10: 47 storeys (Excluding ground floor, including podium and refuge floor)
	T11: 48 storeys (Excluding ground floor, including podium and refuge floor)
No. of Flats	Not more than 1,280
Anticipated Population	Not more than 3,456
Open Space Provision [(iv)]	Not less than 22,000 m²
Parking Spaces, Loading/Unloading Bays and Laybys	
Residential • **Car parking space** • **Visitor car parking space** • **Motorcycle parking space** • **Bicycle parking space** • **Loading/unloading bay**	 175 Nos. 10 Nos. 16 Nos. 85 Nos. 2 Nos.
Commercial • **Car parking space** • **Motorcycle parking space** • **Loading/unloading bay**	N/A
Social Welfare Facilities • **Car parking space** • **Loading/unloading bay**	N/A

Notes:
i. Subject to detailed design and future land surveying.
ii. The proposed aboveground carparks at 1/F and 2/F are to be exempted from GFA calculation.
iii. Maximum building height at main roof level.
iv. For the whole "Other Specified Uses" annotated "Commercial/Residential Development with Public Transport Interchange" Zone in Tuen Mun Area 16.

PACKAGE ONE PROPERTY DEVELOPMENT (APPLICATION SITE)





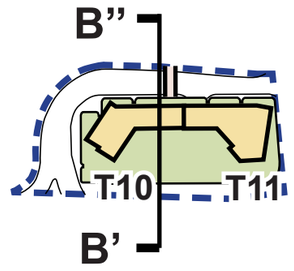
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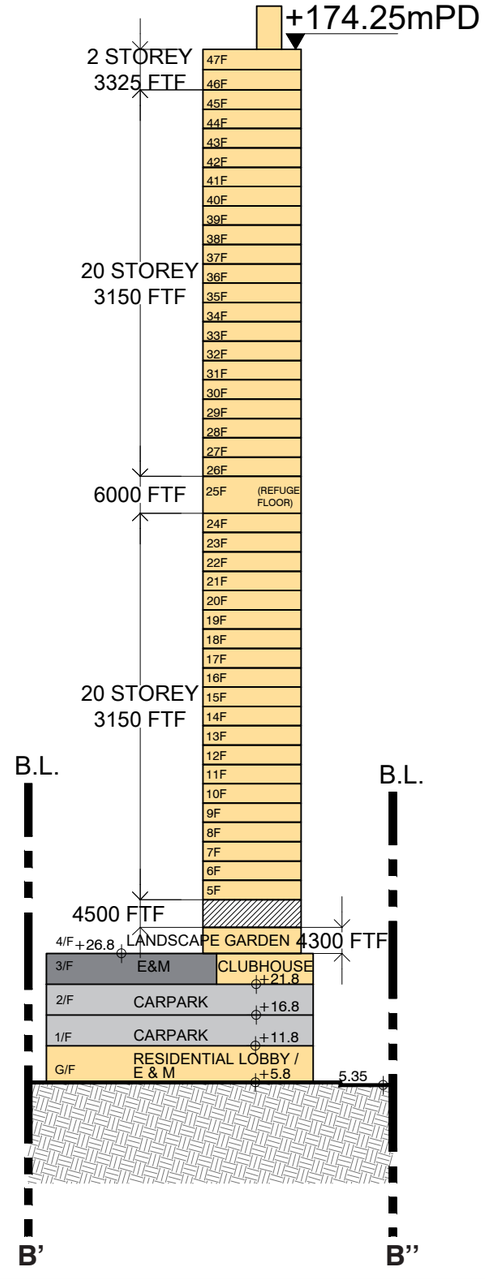
- E&M / Supporting Facilities
- Carpark
- Residential
- Unexcavated Area
- Transfer Plate

Drawing Title **Figure 3.1 - INDICATIVE SECTION A'-A''**	Scale **1:1000** Date **OCTOBER 2026**	Project **PROPOSED MINOR RELAXATION OF BUILDING HEIGHT RESTRICTION AT PACKAGE ONE PROPERTY DEVELOPMENT AT TUEN MUN AREA 16**	Job No. **A-2601**

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PACKAGE ONE PROPERTY DEVELOPMENT (APPLICATION SITE) T10

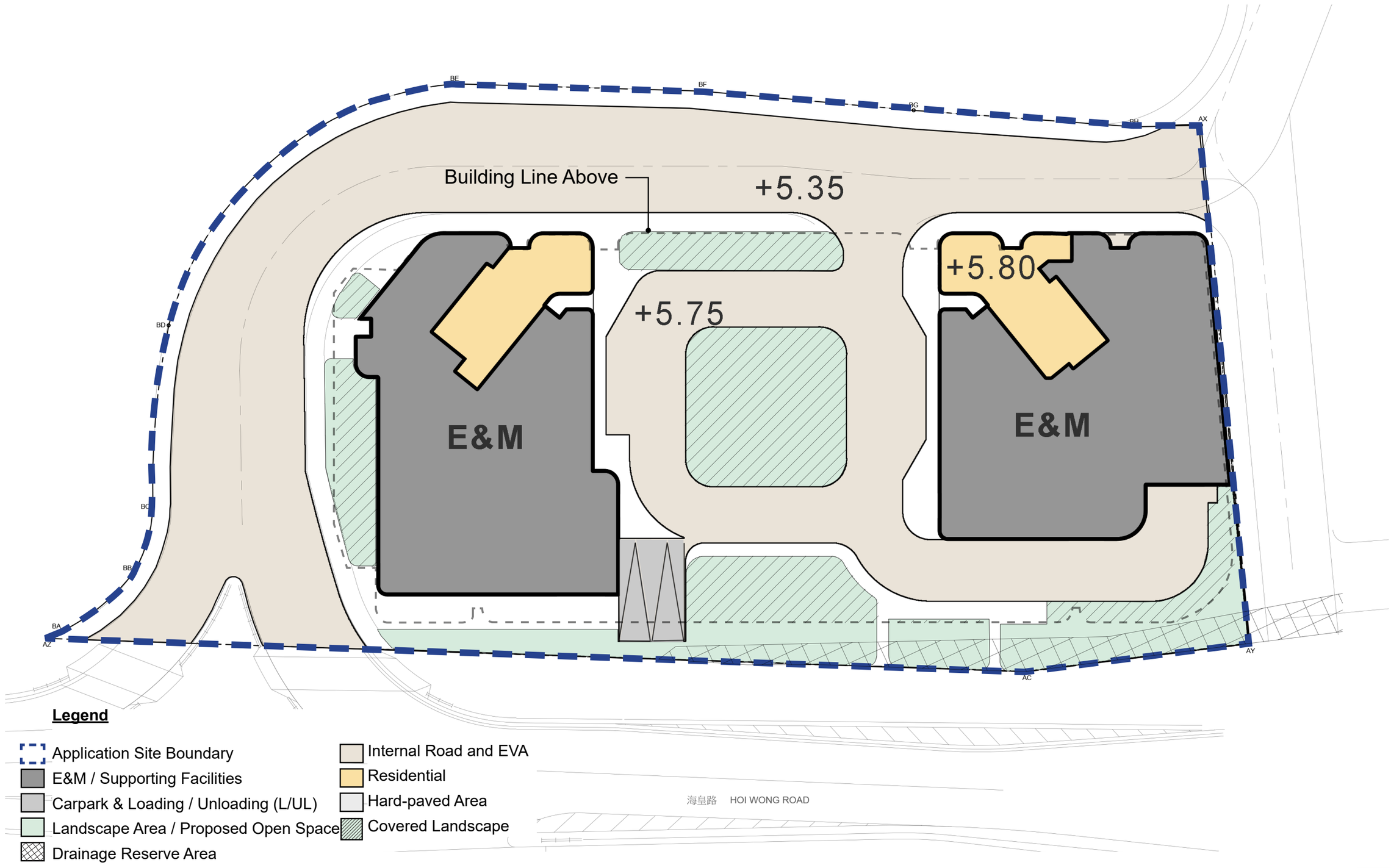




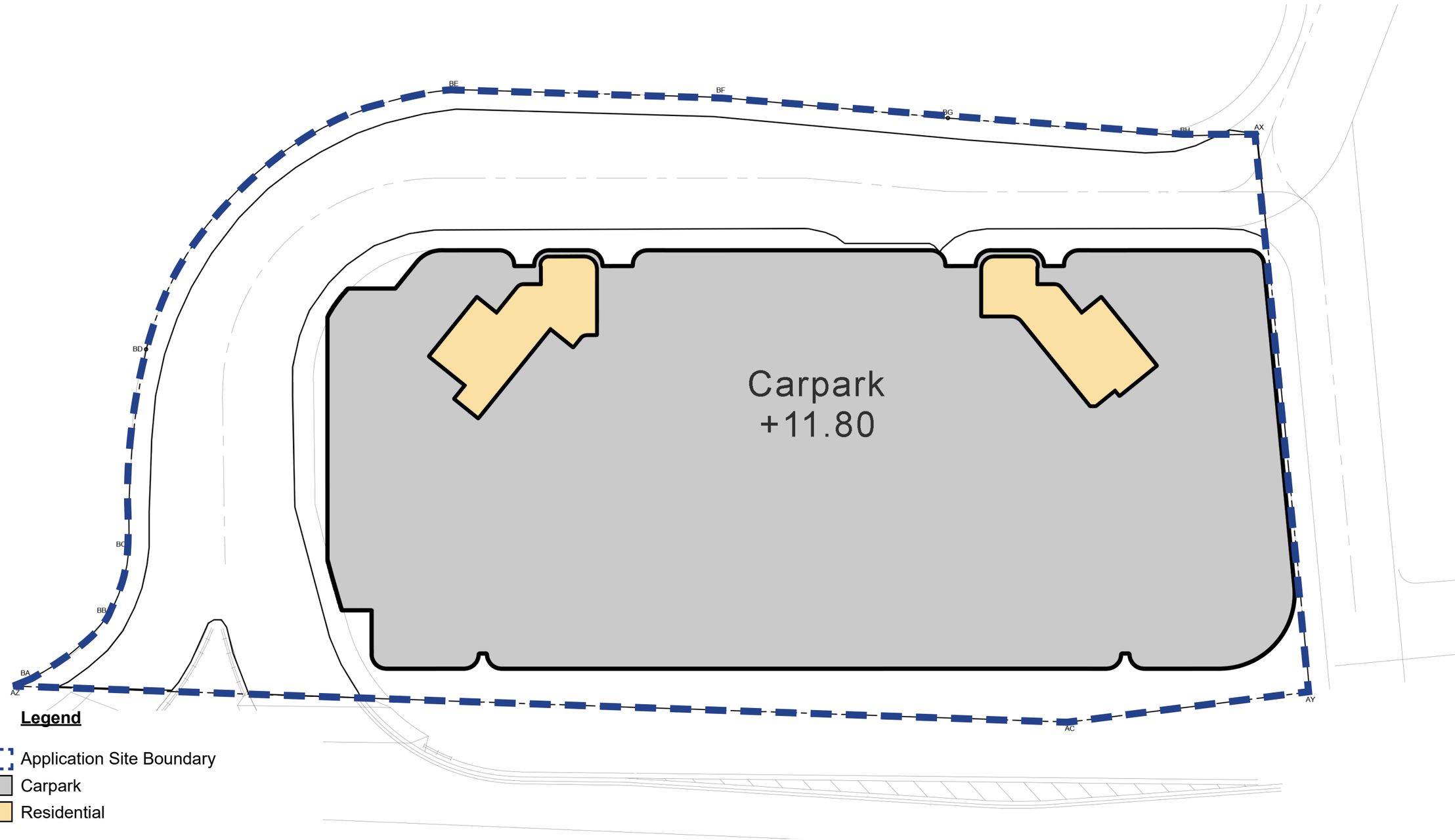
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- E&M / Supporting Facilities
- Carpark
- Residential
- Unexcavated Area
- Transfer Plate

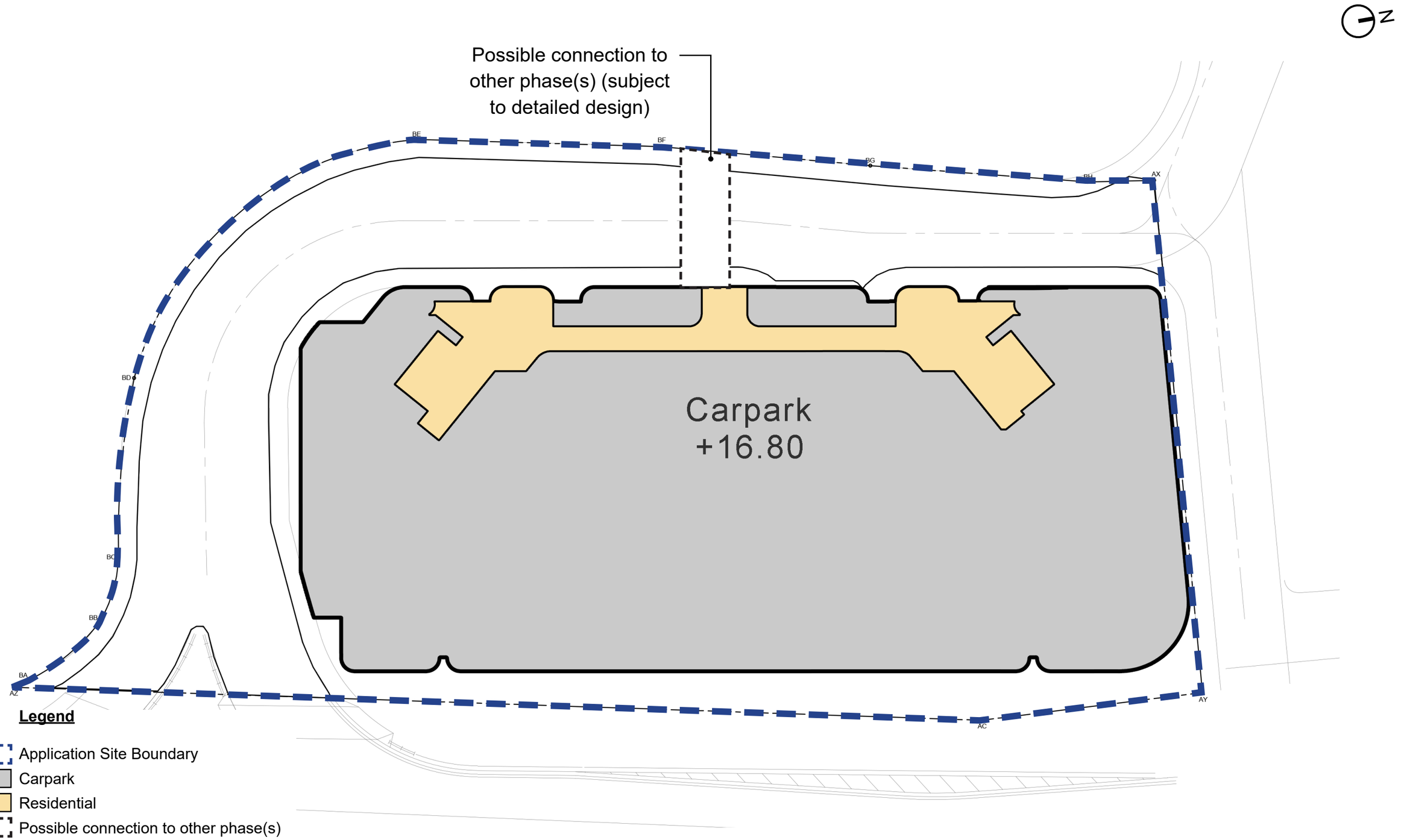
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Figure 3.2 - INDICATIVE SECTION B’-B”	**1:1000**	**PROPOSED MINOR RELAXATION OF BUILDING HEIGHT RESTRICTION AT PACKAGE ONE PROPERTY DEVELOPMENT AT TUEN MUN AREA 16**	**A-2601**	ALKF+ ANDREW LEE KING FUN & ASSOCIATES ARCHITECTS LTD
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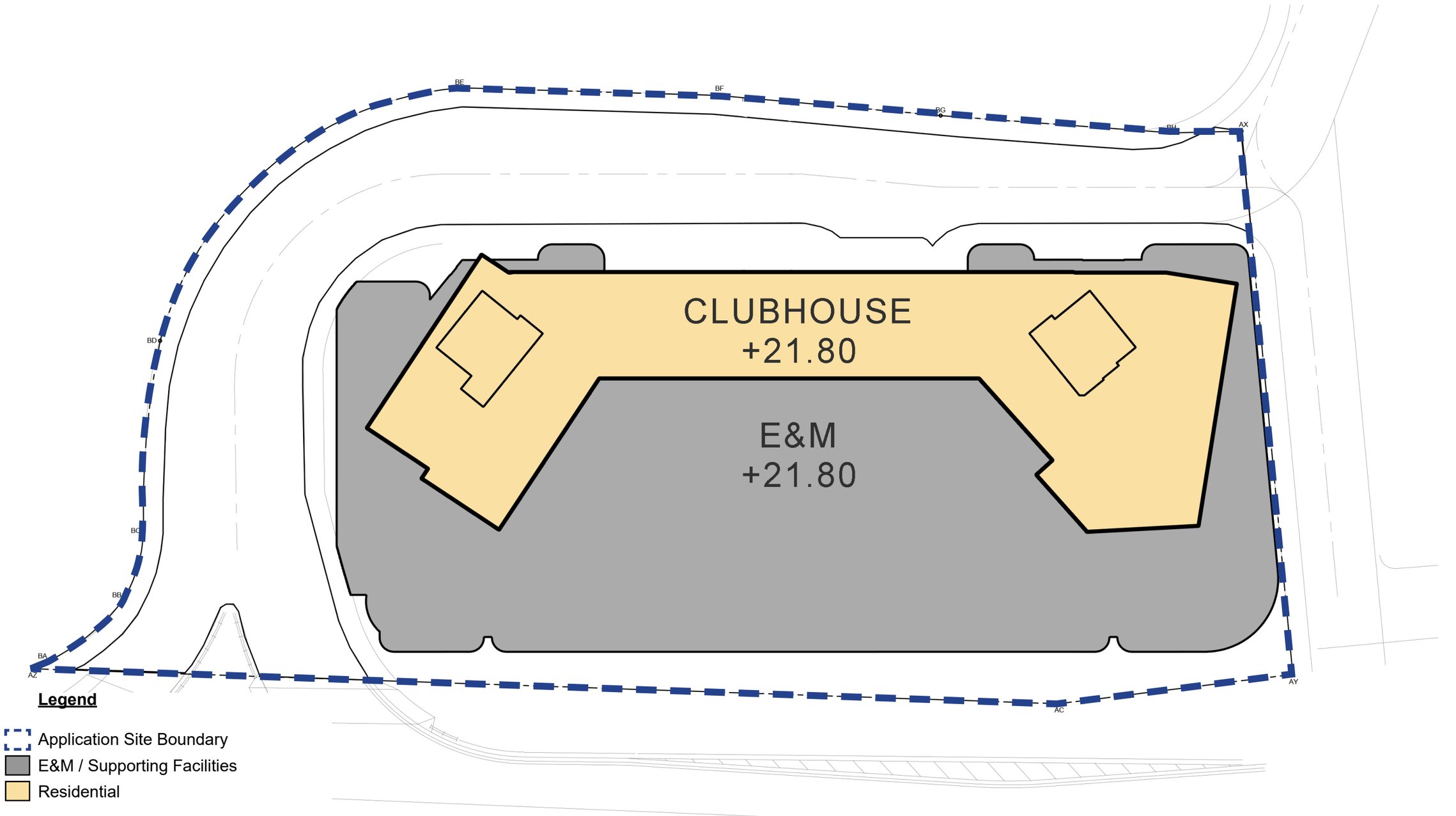
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Figure 3.3 - INDICATIVE G/F PLAN	1:400 Date OCTOBER 2026	**PROPOSED MINOR RELAXATION OF BUILDING HEIGHT RESTRICTION AT PACKAGE ONE PROPERTY DEVELOPMENT AT TUEN MUN AREA 16**	**A-2601**	ALKF+ ANDREW LEE KING FUN & ASSOCIATES ARCHITECTS LTD



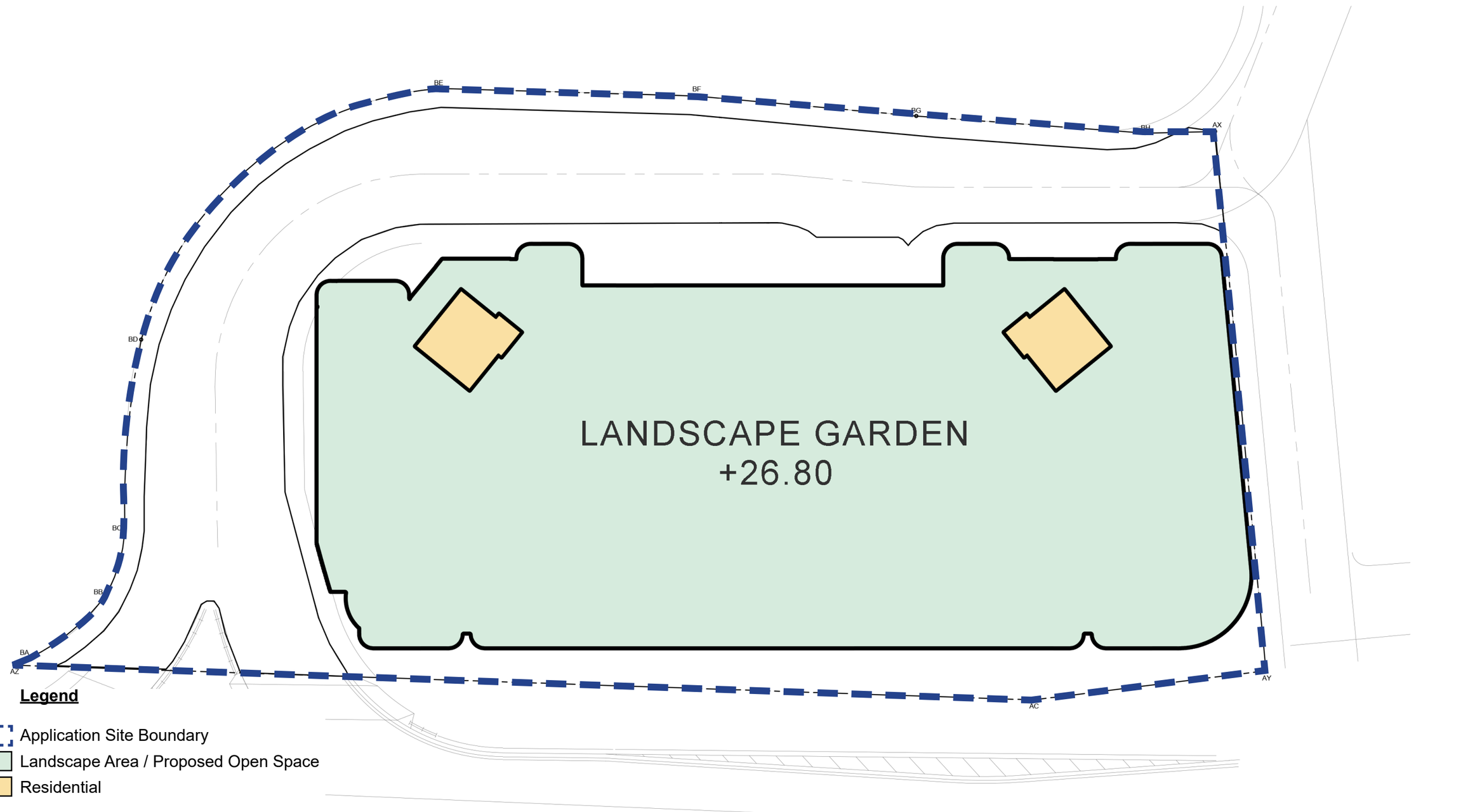
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Figure 3.4 - INDICATIVE 1/F PLAN	**1:400**	**PROPOSED MINOR RELAXATION OF BUILDING HEIGHT RESTRICTION AT PACKAGE ONE PROPERTY DEVELOPMENT AT TUEN MUN AREA 16**	**A-2601**	ALKF+ ANDREW LEE KING FUN & ASSOCIATES ARCHITECTS LTD
	Date **OCTOBER 2026**			



Drawing Title	Scale	Project	Job No.	
Figure 3.5 - INDICATIVE 2/F PLAN	**1:400**	**PROPOSED MINOR RELAXATION OF BUILDING HEIGHT RESTRICTION AT PACKAGE ONE PROPERTY DEVELOPMENT AT TUEN MUN AREA 16**	**A-2601**	ALKF+ ANDREW LEE KING FUN & ASSOCIATES ARCHITECTS LTD
	Date **OCTOBER 2026**			



Drawing Title	Scale	Project	Job No.	
Figure 3.6 - INDICATIVE 3/F PLAN	**1:400**	**PROPOSED MINOR RELAXATION OF BUILDING HEIGHT RESTRICTION AT PACKAGE ONE PROPERTY DEVELOPMENT AT TUEN MUN AREA 16**	**A-2601**	ALKF+ ANDREW LEE KING FUN & ASSOCIATES ARCHITECTS LTD
	Date **OCTOBER 2026**			



Drawing Title	Scale	Project	Job No.	
Figure 3.7 - INDICATIVE 4/F PLAN	**1:400**	**PROPOSED MINOR RELAXATION OF BUILDING HEIGHT RESTRICTION AT PACKAGE ONE PROPERTY DEVELOPMENT AT TUEN MUN AREA 16**	**A-2601**	ALKF+ ANDREW LEE KING FUN & ASSOCIATES ARCHITECTS LTD
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3.2 Comparison with BH Restriction of OZP

Proposed Minor Relaxation of Building Height Restriction is due to Provision of the Aboveground Carparks with Appropriate Floor-to-Floor Height Adopted

3.2.1 The Proposed Scheme has relocated the carpark from the basement level to the aboveground level, which results in exceeding the OZP building height restriction by 0.25m and 3.4m for T10 and T11 respectively.

Table 3.2 - Proposed Minor Relaxation of BH Restriction

Tower	BH Restriction of OZP (a)	Main Roof Level of Proposed Scheme (b)	Difference (b) - (a)	% Change (b) - (a)
T10	174mPD	174.25mPD	0.25mPD	+0.14%
T11		177.40mPD	3.4mPD	+1.95%

3.3 Design Constraints of Proposed Scheme

Design Constraints

3.3.1 The development footprint is restricted by various constraints, including necessary offset from the essential estate road and pavement (constraint 1 of **Figure 3.8** refers) which are open to the sky and serves the whole Subject Site, and set back from Drainage Reserve Zone required under Land Grant as Non-building Area (constraint 2 of **Figure 3.8** refers).

3.4 Design Merits of the Proposed Scheme

3.4.1 The proposed scheme will incorporate urban design measures intended to enhance air ventilation, visual permeability and the overall streetscape. These include: the provision of an air corridor of not less than 15m, extending partially across the southern portion of the Site (Merit 1); a 3m to 5m building setback along Hoi Wong Road (Merit 2); at-grade landscape planters and vertical greening at podium level (Merit 3); and an east-west opening at the ground level (Merit 4). The associated planning and urban design benefits of these design merits are elaborated with the paragraphs below.

Merits 1 to 3: Air Ventilation and Visual Considerations

3.4.2 Under the Proposed Scheme, an air corridor of not less than 15m in width is maintained, extending partially across the southern portion of the Application Site (Merit 1) and a building setback of 3m to 5m along the eastern boundary fronting Hoi Wong Road is proposed (Merit 2). These design provisions are intended to enhance air circulation and visual permeability along the interface with Hoi Wong Road (Merits 1 and 2 of **Figure 3.9 and Figure 3.10 refer**). Other measures, including building separations, building setbacks and the provision of open space will be retained in the future development packages, in which their design will be referenced to the Explanatory Statement of the OZP and relevant prevailing regulations and guidelines.

3.4.3 An east-west opening (in 30m width x 6m floor-to-floor height) through internal drop-off area at Ground Floor is proposed to improve the visual connectivity and air permeability across the site (Merit 3 of **Figure 3.9 and Figure 3.10** refers). The carpark on First Floor and Second Floor will not be fully enclosed but with openable voids to facilitate natural ventilation as well as visual permeability when viewing from Hoi Wong Road.

Merit 4: At-grade Greenery and Vertical Greenery at Podium Level

3.4.4 At-grade greenery, comprising landscape planters and vertical greening at podium level, are proposed in accordance with the Sustainable Building Design Guidelines under PNAP APP-152, in which a minimum greenery coverage of 15% in Primary Zone and 30% for the whole development would be achieved. These landscape features will provide visual relief and enhance the streetscape (Merit 4 of **Figure 3.9** refers). At-grade planter and vertical greening along the podium facade, where practicable, to enhance the visual quality of the building facade during the detailed design stage.

3.5 Mechanism to Safeguard Urban Design Concepts

3.5.1 The Proposed Scheme maintained a stepped height concept descending from the east to the west towards the riverfront of Tuen Mun River Channel, in which the proposed maximum height of towers in Package One at the east side is higher than that of towers in other future packages at the west side.

3.5.2 A building setback of 3m to 5m along the eastern boundary fronting Hoi Wong Road is proposed (Merit 2 of **Figure 3.9 and Figure 3.10** refers) to safeguard the urban design concept about provision of set backs.

3.5.3 Regarding the provision of open space, the overall local open space within the whole A16 development still meets the standard per HKPSG, in which not less than 1m^2 open space per person would be provided.

3.5.4 The currently proposed building heights of Towers 10 and 11 are 174.25mPD and 177.4mPD, respectively. When viewed from a distance, the increase of 3.4m over the landmark buildings is considered minimal. In addition, the proposed increase in BH would contribute to a wider gateway character defined by a cluster of high-rise buildings, while maintaining the overall intent of marking the southern entrance to Tuen Mun New Town.

Constraint 1. Necessary offset from the essential estate road (min. 7.5m) and pavement (min. 2m), which opens to sky and serves the Subject Site

N

Building Line Above

+5.35

+5.75

+5.80

E&M

E&M

BE BF BG BH AX BD BC BB BA AZ AY AC

Hoi Wong Road

Constraint 2. Set back from Drainage Reserve Zone required under Land Grant as Non-building Area

Legend

- Application Site Boundary
- E&M / Supporting Facilities
- Carpark & Loading / Unloading (L/UL)
- Landscape Area / Proposed Open Space
- Drainage Reserve Area
- Internal Road and EVA
- Residential
- Hard-paved Area
- Covered Landscape

Drawing Title	Scale	Project	Job No.	
Figure 3.8 - DESIGN CONSTRAINTS	1:400	**PROPOSED MINOR RELAXATION OF BUILDING HEIGHT RESTRICTION AT PACKAGE ONE PROPERTY DEVELOPMENT AT TUEN MUN AREA 16**	A-2601	ALKF+ ANDREW LEE KING FUN & ASSOCIATES ARCHITECTS LTD
	Date OCTOBER 2026			

Merit 1: Min.15m Building separation and set back required under Sustainable Building Design Guidelines

Merit 3: east-west opening through internal drop-off area at G/F to improve the visual connectivity and air permeability across the site

Merit 4: At-grade greenery and vertical greening will be provided in podium level for visual relief and to enhance streetscape

N

Building Line Above

+5.35

+5.75

+5.80

E&M

E&M

30m

>15m

3-5m Set Back

Hoi Wong Road

Merit 2: 3-5m set back are provided to enhance air ventilation

Legend

- Application Site Boundary
- E&M / Supporting Facilities
- Carpark & Loading / Unloading (L/UL)
- Landscape Area / Proposed Open Space
- Drainage Reserve Area
- Internal Road and EVA
- Residential
- Hard-paved Area
- Covered Landscape

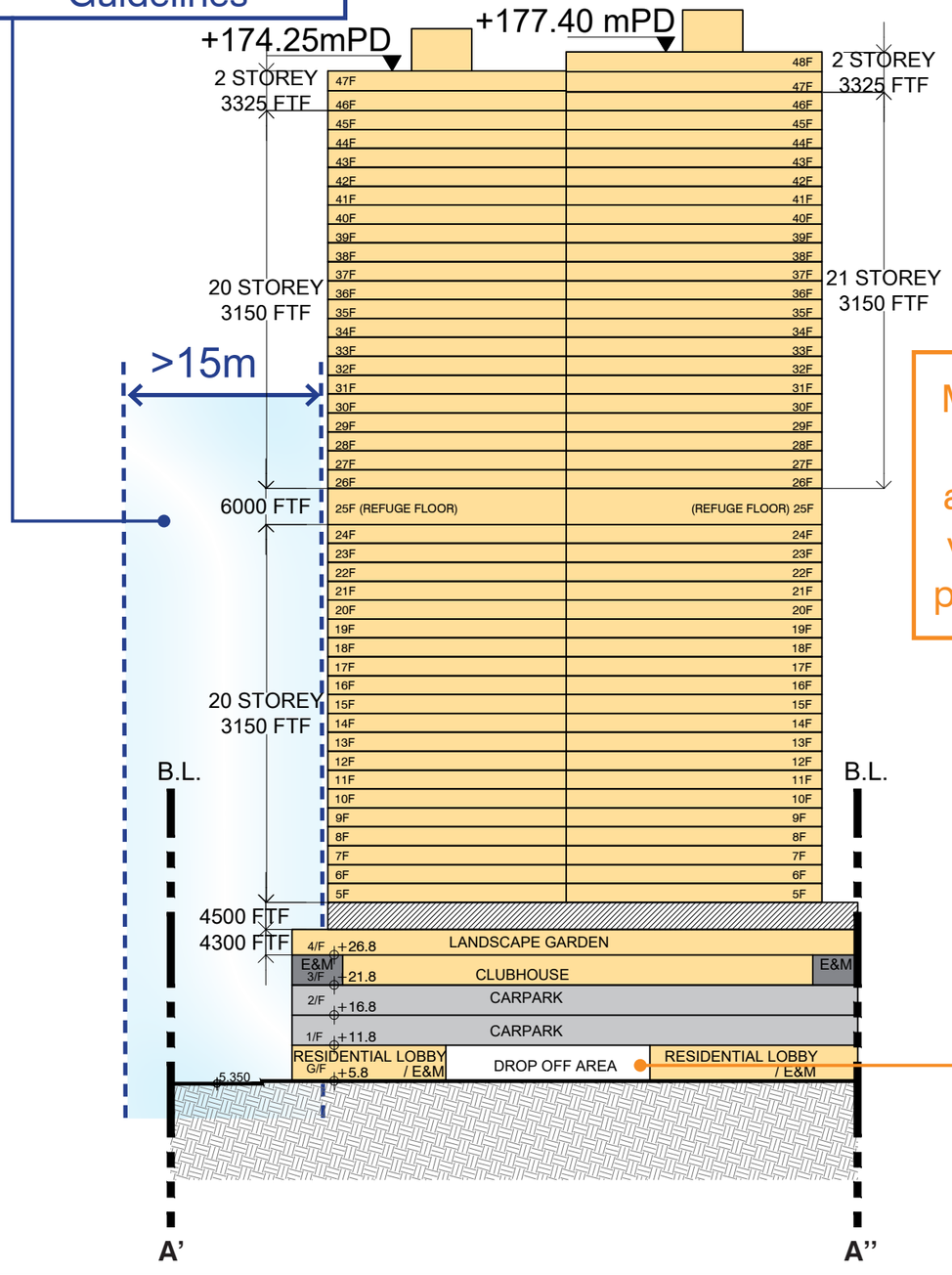
Drawing Title **Figure 3.9 - DESIGN MERITS (PLAN)**	Scale **1:400** Date **OCTOBER 2026**	Project **PROPOSED MINOR RELAXATION OF BUILDING HEIGHT RESTRICTION AT PACKAGE ONE PROPERTY DEVELOPMENT AT TUEN MUN AREA 16**	Job No. **A-2601**

ALKF+
ANDREW LEE KING FUN & ASSOCIATES ARCHITECTS LTD

Merit 1: Min.15m Building separation and set back required under Sustainable Building Design Guidelines

PACKAGE ONE PROPERTY DEVELOPMENT (APPLICATION SITE)

T10 T11



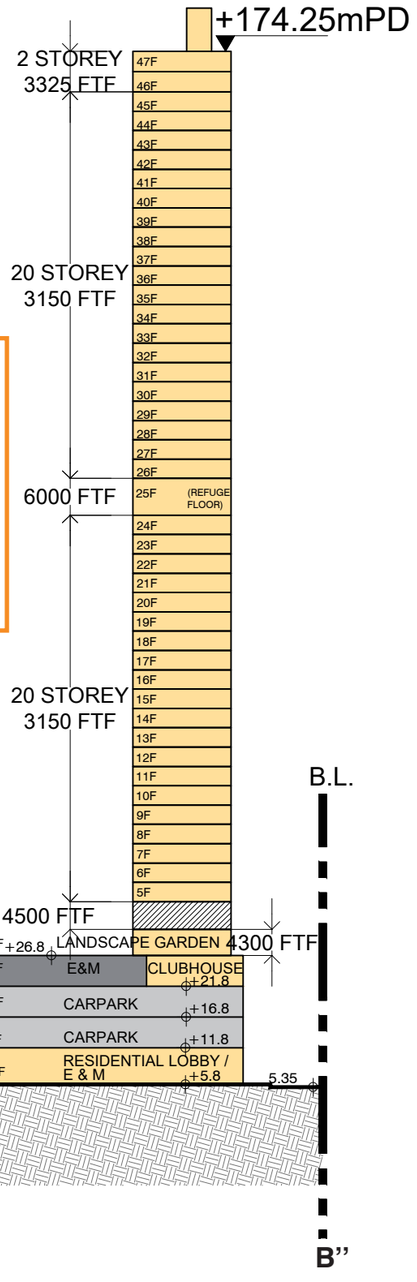
Merit 3: east-west opening through internal drop-off area at G/F to improve the visual connectivity and air permeability across the site

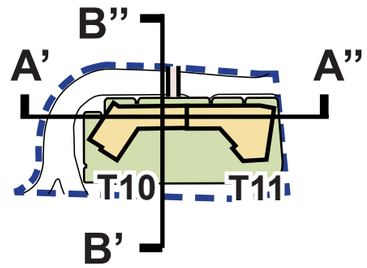
Merit 2: 3-5m set back are provided to enhance air ventilation

3-5m Set Back

PACKAGE ONE PROPERTY DEVELOPMENT (APPLICATION SITE)

T10





Legend

- E&M / Supporting Facilities
- Carpark
- Residential
- Unexcavated Area
- Transfer Plate

Drawing Title	Scale	Project	Job No.
Figure 3.10 - DESIGN MERITS (SECTIONS)	1:1000 Date OCTOBER 2026	**PROPOSED MINOR RELAXATION OF BUILDING HEIGHT RESTRICTION AT PACKAGE ONE PROPERTY DEVELOPMENT AT TUEN MUN AREA 16**	A-2601

ALKF+ ANDREW LEE KING FUN & ASSOCIATES ARCHITECTS LTD

4. TECHNICAL CONSIDERATIONS

As mentioned in paragraph 2.2.2, under the latest Government's policy to facilitate the implementation of the enhanced GFA exemption arrangements for carparks in private development projects, for minor relaxation of BH due to the construction of no more than two levels of aboveground carparks, a streamlined town planning procedure will be adopted in which the Applicant will only be required to submit a visual appraisal. Accordingly, for the subject planning application which only involves minor relaxation of BH due to the provision of no more than two levels of aboveground carparks, a visual appraisal has been conducted and summarized below.

4.1 Visual Appraisal

4.1.1 The effects of visual changes on the assessment area and public viewers as a result of the Proposed Development are assessed, taking into the account of visual composition, its effect on visual obstruction, visual changes to public viewers and visual resources. The existing environment surrounding the Proposed Development is shown in **Figure 4.1**. **Figure 4.2** illustrates the proposed Viewpoints and the visual envelope. Photomontages showing the Proposed Development are presented in **Figure 4.3 to 4.12**.

4.1.2 **Viewpoint 1: View Southwest from Tuen Mun Park (Figure 4.3)**

VP1 is located about 330m to the north of the Application Site. The visual composition of the Proposed Scheme is largely similar to the OZP Compliant Scheme with only a very minor increase in BH. The main visual elements, which are Tuen Mun River Channel in the foreground as well as mountain backdrop and open view of sky in the background will not be affected. The change in visual context is expected to be negligible.

The visual focus of the riverfront promenade users would mostly be within the park setting and looking out towards the direction of Tuen Mun River Channel, while they may catch a glimpse view of the Proposed Scheme when walking through the park. Since riverfront promenade users occupy the space for leisure and recreational purposes and they are more sensitive to the surrounding environment, the sensitivity of the public viewers at this viewpoint is medium. As view towards the Proposed Scheme will be generally screened off by the existing high-rise developments and vegetation at this viewpoint, visual effects of the Proposed Scheme on public viewer would be **negligible**.

4.1.3 **Viewpoint 2: View West from Hoi Chu Road Footpath (Figure 4.4)**

VP2 is located about 430m to the east of the Application Site. With such distance, the change in visual composition of the Proposed Scheme due to the minor increase in BH is barely noticeable. The Proposed Scheme will also remain visually compatible with the surrounding planned high-rise developments. The main visual elements, which is the Hoi Chu Road Playground in the foreground will not be affected. The change in visual context is expected to be negligible.

Views towards the Proposed Scheme are partially screened by the existing vegetation within the local open space and the adjoining residential developments. As viewers are moving along the footpath and the nature of the viewpoint is transient, the sensitivity of the public viewers from this viewpoint is low. Visual effects brought by the Proposed Scheme is considered **negligible** as compared to the OZP Compliant Scheme.

4.1.4 **Viewpoint 3: View Northwest from Hoi Wong Road (Figure 4.5)**

VP3 is located about 380m to the southeast of the Application Site. The visual composition of the Proposed Scheme is similar to the OZP Compliant Scheme with only a very minor increase in BH. The main visual elements, which are light rail in the foreground as well as mountain backdrop and open view of sky in the background will not be affected. The change in visual context is expected to be negligible.

View towards the Proposed Scheme is partially screened by the existing vegetation. Since the pedestrians and cyclists are unlikely to stop at this location, the viewers are transient in nature. Therefore, the sensitivity of public viewers at this viewpoint is low. Considering the magnitude of change in building height and sensitivity of public viewers at Hoi Wong Road, visual impact brought by the Proposed Scheme would be **negligible**.

4.1.5 **Viewpoint 4: View Southeast from Wu Shan Riverside Park (Figure 4.6)**

VP4 is located about 100m to the northwest of the Application Site. The visual composition of the Proposed Scheme is the same to the OZP Compliant Scheme as Package One Property Development would not be seen from the viewpoint.

The visual focus of the park users would mostly be within the park setting and looking towards the direction of Tuen Mun River Channel, while they may catch a glimpse view of the Subject Site when

walking through the park. Considering the fair quality of view and the park users may carry out stationary activities, the sensitivity of public viewers at this viewpoint is medium. As the Proposed Scheme would not be seen from this viewpoint, there would be **no visual impact** brought by the Proposed Scheme to public viewers.

4.1.6 **Viewpoint 5: View Southeast from Castle Peak Hiking Trail (Figure 4.7)**

VP5 is located about 1350m to the northwest of the Application Site. With such distance and elevation, the change in visual composition of the Proposed Scheme due to the minor increase in BH is barely noticeable. The Proposed Scheme will also remain visually compatible with the surrounding planned developments of Tuen Mun Town. The main visual elements, which is vegetation in the foreground as well as the mountain backdrop and open view of sky in the background will not be affected. The change in visual context is expected to be negligible.

Considering the occasional and transient nature of small number of passer-by, the sensitivity of public viewers at this viewpoint is low. As the proposed magnitude of change is minor, visual impact brought by the Proposed Scheme to public viewers would be **negligible**.

4.1.7 **Viewpoint 6: View Northeast from the Entrance of Wu Shan Recreation Playground (Figure 4.8)**

VP6 is located about 150m to the southwest of the Application Site. The visual composition of the Proposed Scheme is similar to the OZP Compliant Scheme with only a very minor increase in BH. The main visual elements, which is the Tuen Mun River Channel will not be affected. The change in visual context is expected to be negligible.

The visual focus of the pedestrian users would mostly be within the promenade setting and looking out towards the direction of Tuen Mun River Channel, while they may catch a glimpse view of the Subject Site when walking through the promenade. Considering the fair quality of view and the park users may carry out stationary activities, the sensitivity of public viewers at this viewpoint is medium. As visual composition of the Proposed Scheme is similar to the OZP Compliant Scheme with slight increase in building height, visual impact brought by the Proposed Scheme would be **negligible**.

4.1.8 **Viewpoint 7: View Southwest from Footbridge Across the Tuen Mun River Channel near Yau Oi Estate(Figure 4.9)**

VP7 is located about 205m to the north of the Application Site. The visual composition of the Proposed Scheme is the same to the OZP Compliant Scheme. Package One Property Development is largely screened by other towers in the Subject Site.

The visual focus of the pedestrian users would mostly remain to the Tuen Mun River Channel and the surrounding promenade setting. While they will catch the view of the Subject Site merged with the surrounding residential development when walking across the Tuen Mun River Channel through the Yau Oi Footbridge. Considering the fair quality of view and pedestrians walking along the footbridge may carry out stationary activities, the sensitivity of public viewers at this viewpoint is medium. Since the visual composition of the Proposed Scheme remains the same as that of the OZP Compliant Scheme, visual impact brought by the Proposed Scheme to the public viewers would be **negligible**.

4.1.9 **Viewpoint 8: View Northwest from Castle Peak Bay Waterfront promenade (Figure 4.10)**

VP8 is located about 900m to the southeast of the Application Site. The visual composition of the Proposed Scheme is similar to the OZP Compliant Scheme with only minor increase in BH. The main visual elements, which are Tuen Mun Typhoon Shelter in the foreground as well as mountain backdrop and open view of sky in the background will not be affected. The change in visual context is expected to be negligible.

The visual focus of the pedestrian users would mostly be within the promenade setting and looking out towards the direction of the jetty of Tuen Mun Typhoon Shelter, while they can catch a glimpse view of the Proposed Scheme when walking through the promenade. Considering the fair quality of view and the park users may carry out stationary activities, the sensitivity of public viewers at this viewpoint is low. The typhoon shelter, the existing high-rise development and Castle Peak ridge-line have already formed an important part of existing viewers' visual experience. The Proposed Scheme will be seen as an extension of the high-rises group and will not significantly alter the setting of the Tuen Mun South. Considering the magnitude of change and sensitivity of the public viewers at the viewpoint, visual impact brought by the Proposed Scheme would be **negligible**.

4.1.10 **Viewpoint 9: View Northwest from Tuen Mun Promenade (Figure 4.11)**

VP9 is located about 1390m to the southeast of the Application Site. The visual composition of the Proposed Scheme is similar to the OZP Compliant Scheme with only a very minor increase in BH. The main visual elements, which are Tuen Mun Typhoon Shelter in the foreground as well as mountain backdrop and open view of sky in the background will not be affected. The change in visual context is expected to be negligible.

The visual focus of the pedestrian users would mostly be within the promenade setting and looking out towards the direction of the jetty of Tuen Mun Typhoon Shelter, while they may catch a glimpse view of the Proposed Development when walking through the promenade. Considering the fair quality of view and the park users may carry out stationary activities, the sensitivity of public viewers at this viewpoint is low. Visitors of the Tuen Mun Promenade would see one of the towers of the Proposed Scheme which is slightly taller than the OZP Compliant Scheme. As the magnitude of change is minor, visual impact brought by the Proposed Scheme to the public viewers on Tuen Mun Promenade would be **negligible**.

4.1.11 **Viewpoint 10: View Southwest from Tuen Mun River (Eastern Bank) Garden (Figure 4.12)**

VP10 is located about 80m to the north of the Application Site. The visual composition of the Proposed Scheme is the same to the OZP Compliant Scheme as Package One Property Development will not be seen from the viewpoint.

The visual focus of the visitors and pedestrian users would mostly be within the park and promenade setting. Considering the fair quality of view and the park users may carry out stationary activities, the sensitivity of public viewers at the viewpoint is medium. Since the Proposed Scheme will not be seen from this viewpoint, visual impact brought by the Proposed Scheme to public viewers would be **negligible**.

4.1.12 Conclusion

With consideration of the existing and planned surrounding context of the Application Site, it is concluded that the overall visual impact induced by the Proposed Scheme due to the minor relaxation of BH as compared to the OZP Compliant Scheme) is **negligible**.



Legend

APPLICATION SITE (PACKAGE ONE PROPERTY DEVELOPMENT)

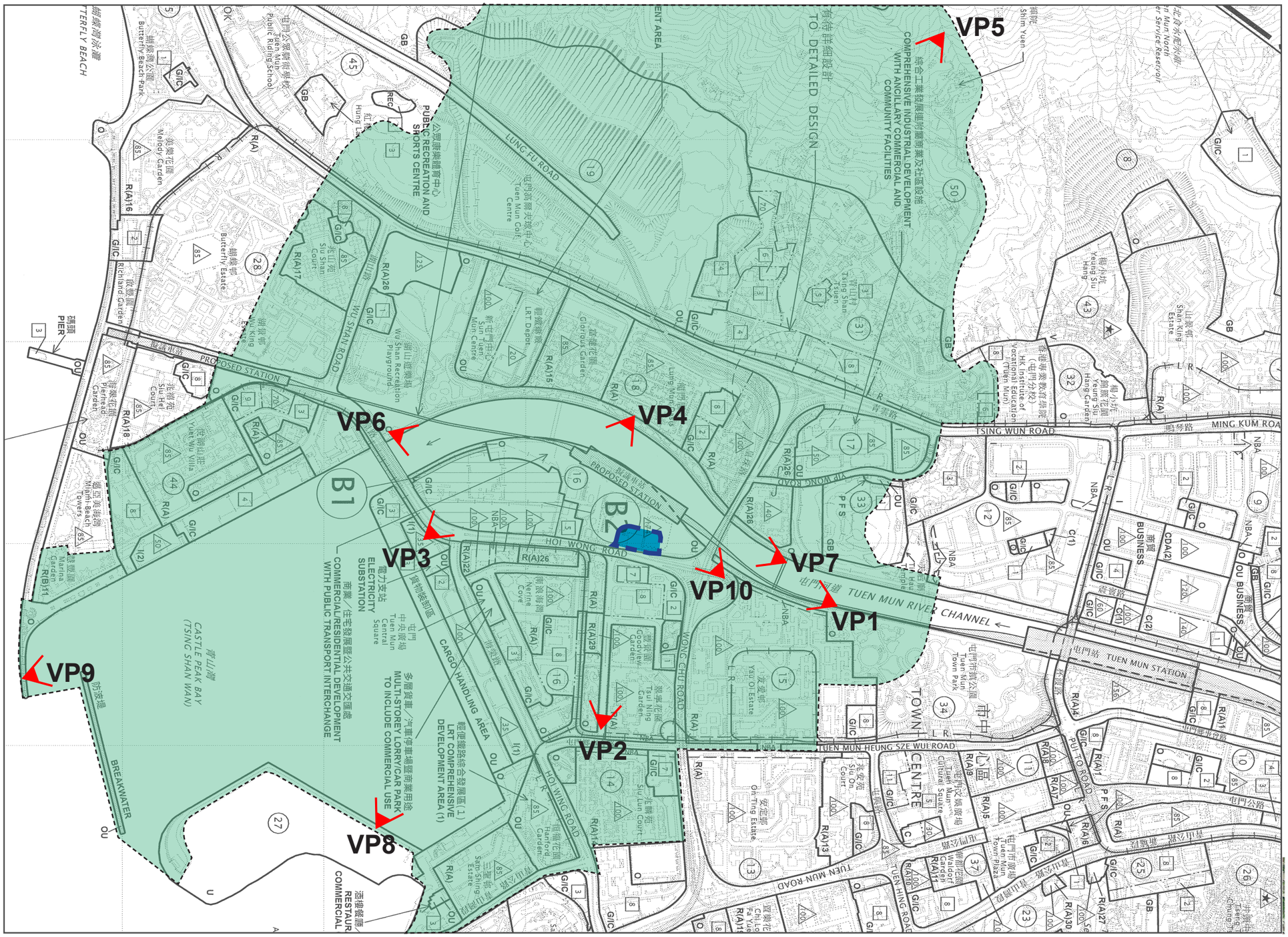
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SCALE 1 : 10,000

0 100 200 300 400 500m

NORTH

Drawing Title	Scale	Project	Job No.	
FIGURE 4.1 - AERIAL PHOTO OF TUEN MUN SOUTH	**1:10000**	**PROPOSED MINOR RELAXATION OF BUILDING HEIGHT RESTRICTION AT PACKAGE ONE PROPERTY DEVELOPMENT AT TUEN MUN AREA 16**	**A-2601**	ALKF+ ANDREW LEE KING FUN & ASSOCIATES ARCHITECTS LTD
	Date **OCTOBER 2026**			



Legend

- APPLICATION SITE (PACKAGE ONE PROPERTY DEVELOPMENT)
- VISUAL ENVELOPE
- VIEWPOINT

VP1
View Southwest from Tuen Mun Park

VP2
View West from Hoi Chu Road Footpath

VP3
View Northwest from Hoi Wong Road

VP4
View Southeast from Wu Shan Riverside Park

VP5
View Southeast from Castle Peak Hiking Trail

VP6
View Northeast from the entrance of Wu Shan Recreation Playground

VP7
View Southwest from Footbridge across the Tuen Mun River Channel near Yau Oi Estate

VP8
View Northwest from Castle Peak Bay Waterfront Promenade

VP9
View Northwest from Tuen Mun Promenade

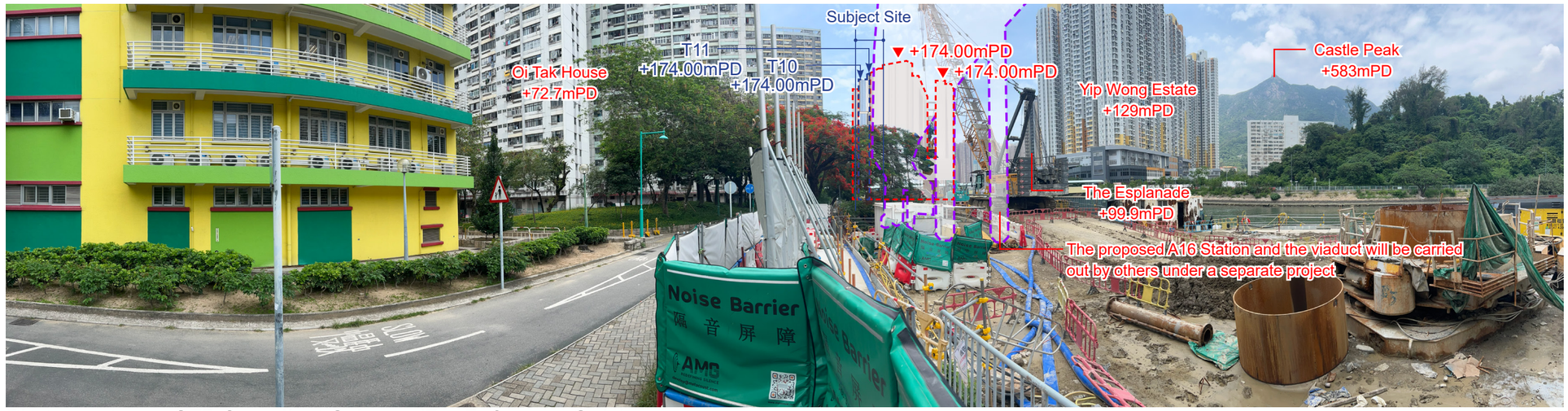
VP10
View Southwest from Tuen Mun River (Eastern Bank) Garden

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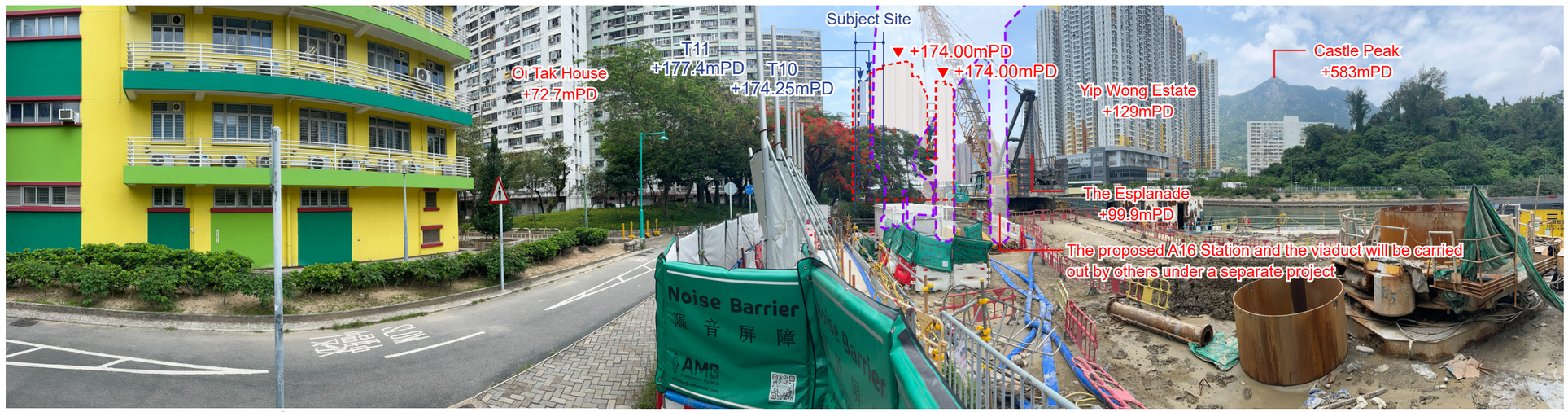
NORTH

Drawing Title **FIGURE 4.2 - VISUAL ENVELOPE AND VIEWPOINTS**	Scale **1:10000** Date **OCTOBER 2026**	Project **PROPOSED MINOR RELAXATION OF BUILDING HEIGHT RESTRICTION AT PACKAGE ONE PROPERTY DEVELOPMENT AT TUEN MUN AREA 16**	Job No. **A-2601**

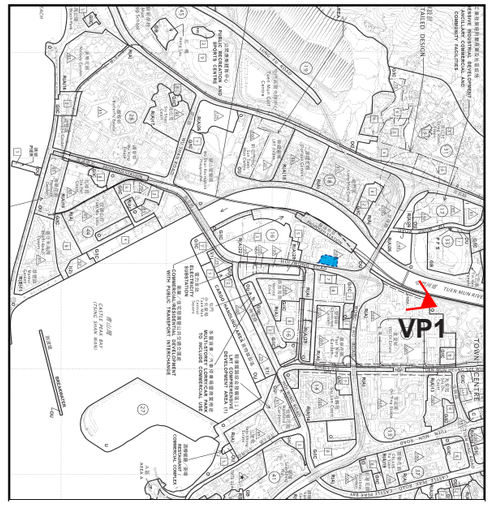
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Photomontage - OZP Compliant Scheme (For Reference Only)



Photomontage - Proposed Scheme



Key Plan

Viewpoint Elevation: +4.00mPD
Viewing Distance: ~330m

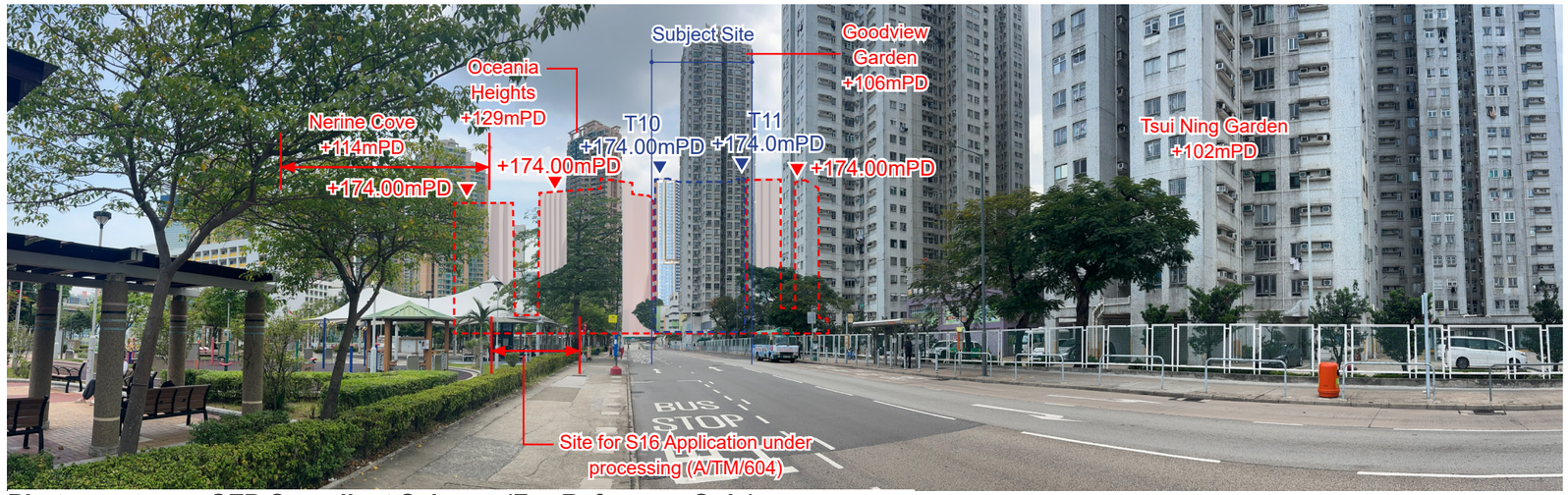
SUBJECT SITE

PROPOSED DEVELOPMENT

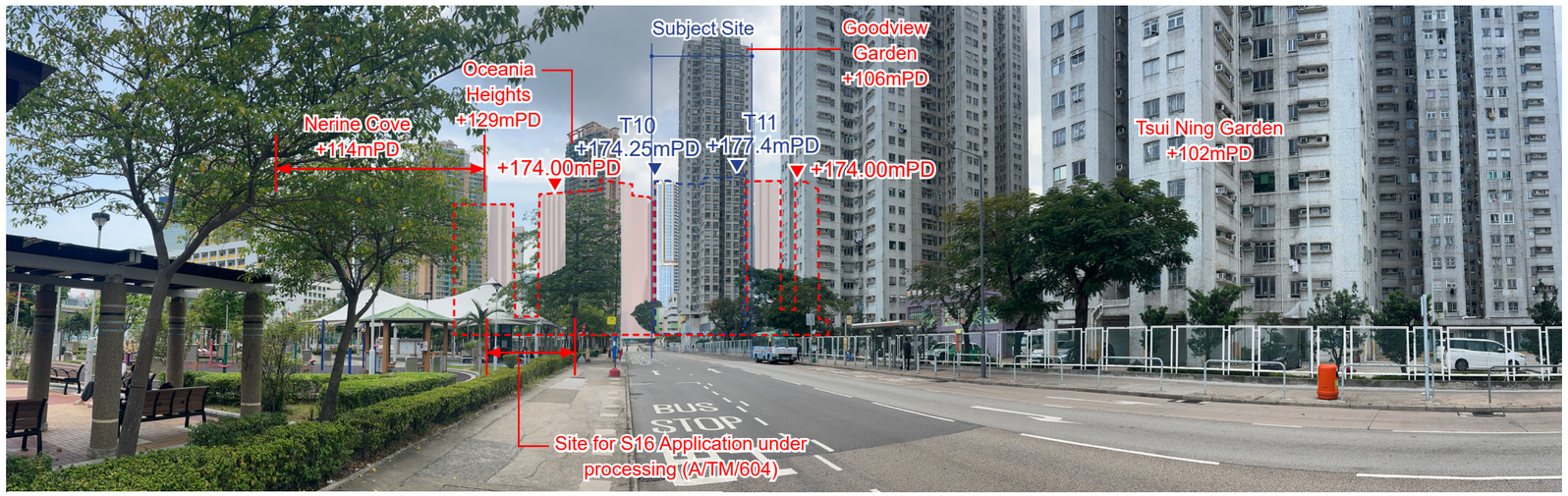
OTHER PACKAGES OF THE SITE

THE PROPOSED A16 STATION AND THE VIADUCT WILL BE CARRIED OUT BY OTHERS UNDER A SEPARATE PROJECT

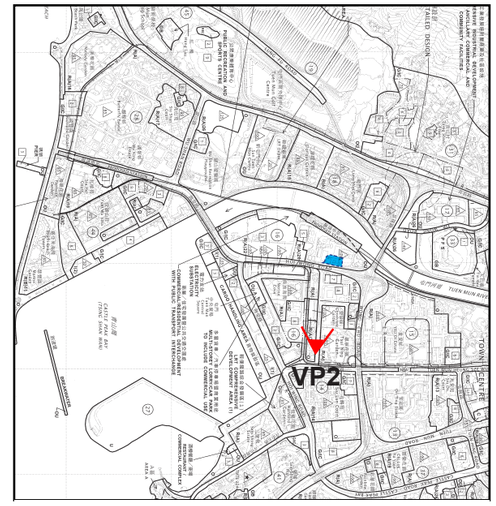
Drawing Title	Scale	Project	Job No.	
FIGURE 4.3 - PHOTOMONTAGE OF VIEWPOINT 1: VIEW SOUTHWEST FROM TUEN MUN PARK	**N.T.S.**	**PROPOSED MINOR RELAXATION OF BUILDING HEIGHT RESTRICTION AT PACKAGE ONE PROPERTY DEVELOPMENT AT TUEN MUN AREA 16**	**A-2601**	ALKF+ ANDREW LEE KING FUN & ASSOCIATES ARCHITECTS LTD
	Date **OCTOBER 2026**			



Photomontage - OZP Compliant Scheme (For Reference Only)



Photomontage - Proposed Scheme



Key Plan

Viewpoint Elevation: +5.00mPD
Viewing Distance: ~430m

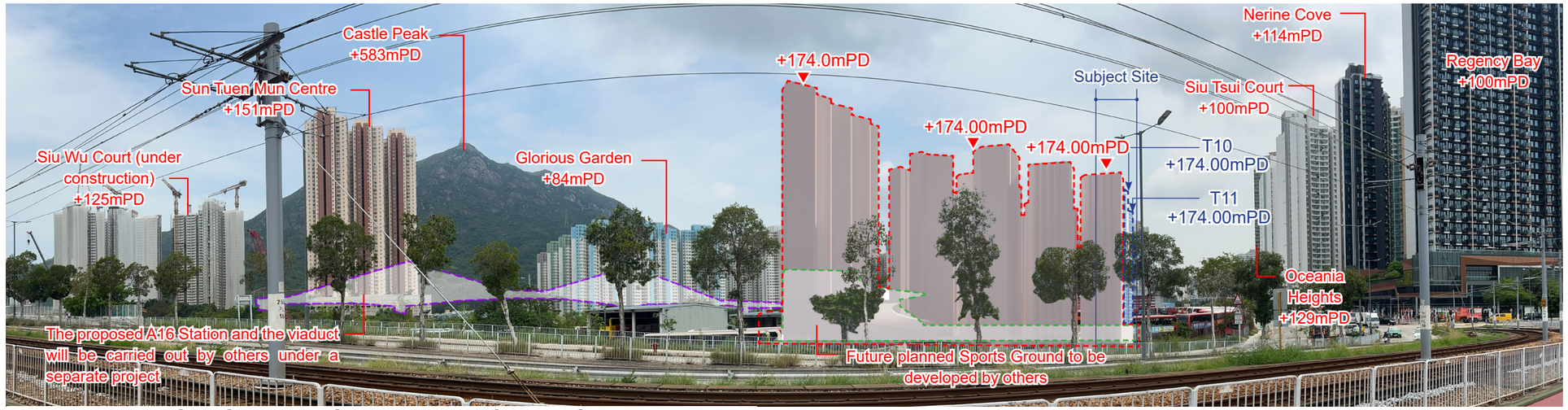
SUBJECT SITE

PROPOSED DEVELOPMENT

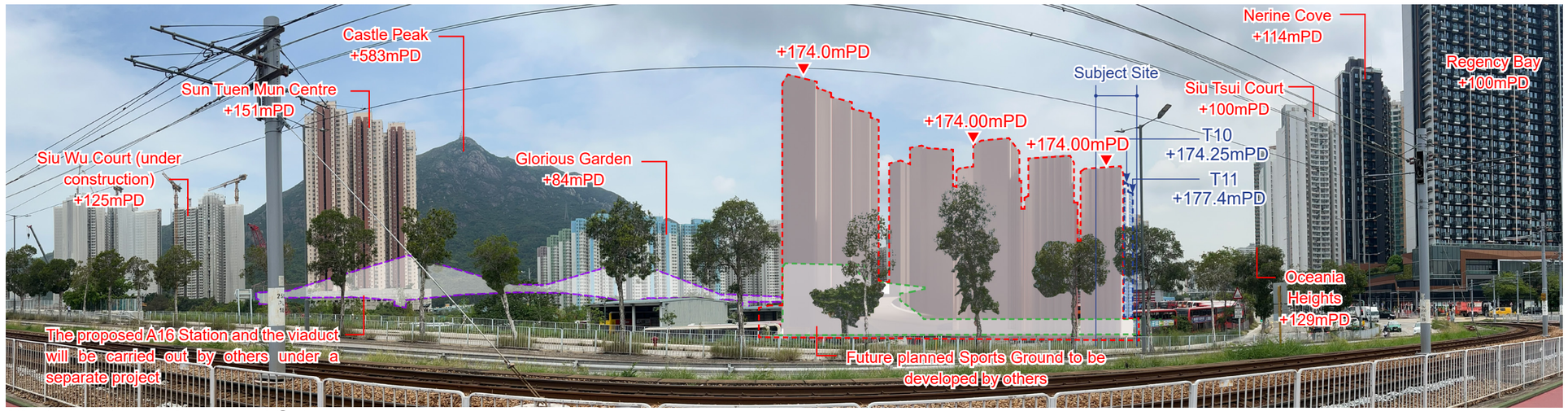
OTHER PACKAGES OF THE SITE

Drawing Title **FIGURE 4.4 - PHOTOMONTAGE OF VIEWPOINT 2: VIEW WEST FROM HOI CHU ROAD FOOTPATH**	Scale **N.T.S.** Date **OCTOBER 2026**	Project **PROPOSED MINOR RELAXATION OF BUILDING HEIGHT RESTRICTION AT PACKAGE ONE PROPERTY DEVELOPMENT AT TUEN MUN AREA 16**	Job No. **A-2601**

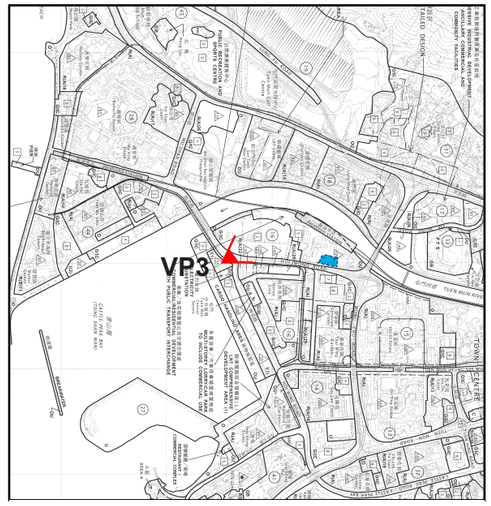
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Photomontage - OZP Compliant Scheme (For Reference Only)



Photomontage - Proposed Scheme



Key Plan

Viewpoint Elevation: +4.50mPD
Viewing Distance: ~380m

SUBJECT SITE

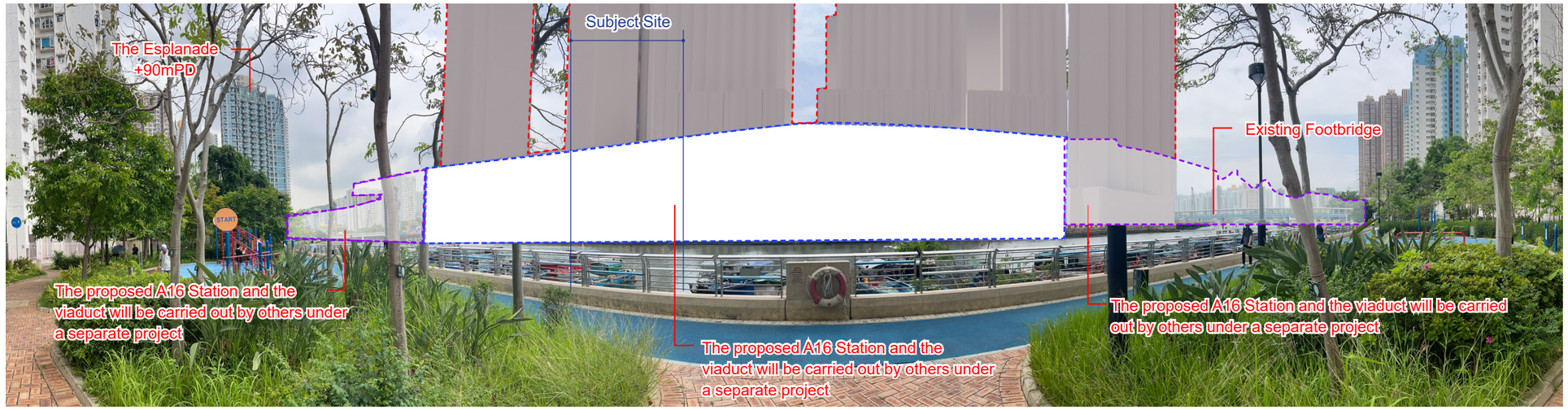
PROPOSED DEVELOPMENT

OTHER PACKAGES OF THE SITE

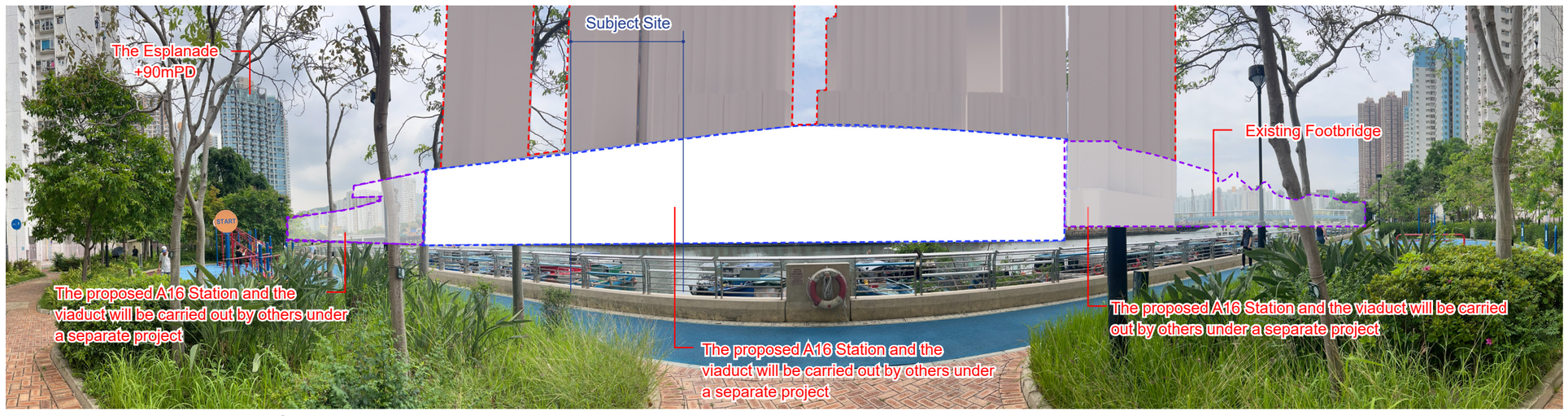
THE PROPOSED A16 STATION AND THE VIADUCT WILL BE CARRIED OUT BY OTHERS UNDER A SEPARATE PROJECT

Drawing Title	Scale	Project	Job No.
FIGURE 4.5 - PHOTOMONTAGE OF VIEWPOINT 3: VIEW NORTHWEST FROM HOI WONG ROAD	**N.T.S.**	**PROPOSED MINOR RELAXATION OF BUILDING HEIGHT RESTRICTION AT PACKAGE ONE PROPERTY DEVELOPMENT AT TUEN MUN AREA 16**	**A-2601**
	Date **OCTOBER 2026**		

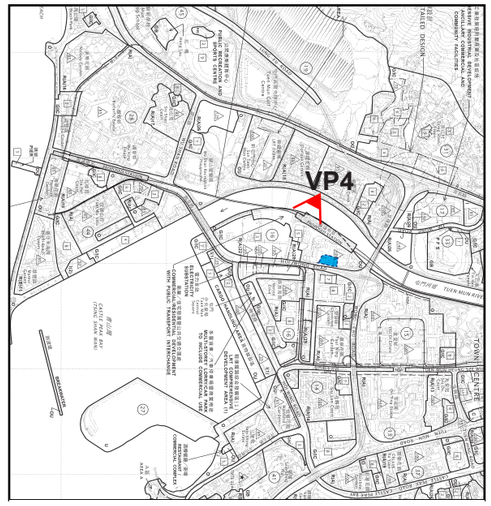
ALKF+ ANDREW LEE KING FUN & ASSOCIATES ARCHITECTS LTD



Photomontage - OZP Compliant Scheme (For Reference Only)



Photomontage - Proposed Scheme



Key Plan

Viewpoint Elevation: +3.90mPD
Viewing Distance: ~100m

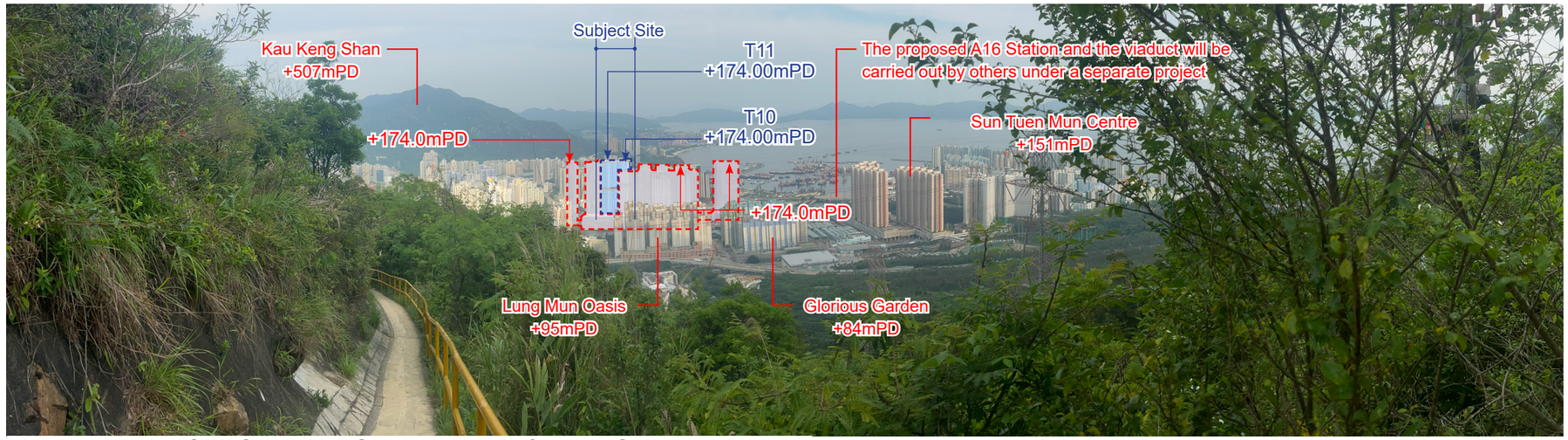
SUBJECT SITE

PROPOSED DEVELOPMENT

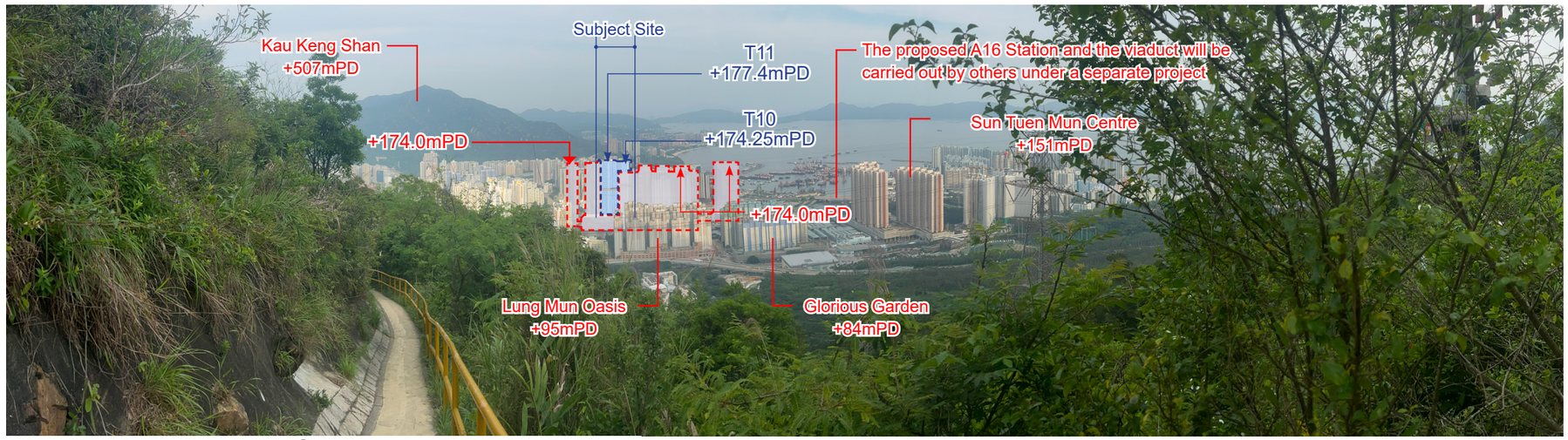
OTHER PACKAGES OF THE SITE

THE PROPOSED A16 STATION AND THE VIADUCT WILL BE CARRIED OUT BY OTHERS UNDER A SEPARATE PROJECT

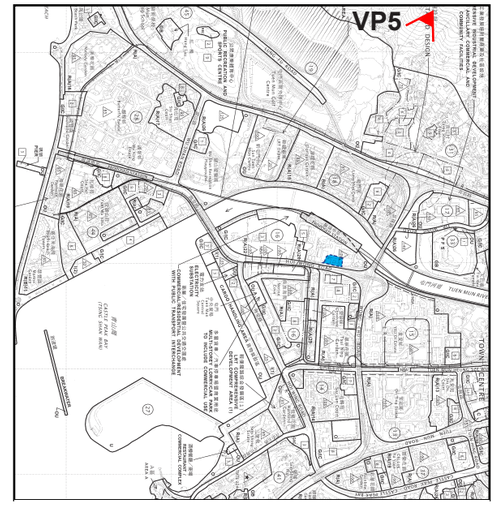
Drawing Title	Scale	Project	Job No.	
FIGURE 4.6 - PHOTOMONTAGE OF VIEWPOINT 4: VIEW SOUTHEAST FROM WU SHAN RIVERSIDE PARK	**N.T.S.**	**PROPOSED MINOR RELAXATION OF BUILDING HEIGHT RESTRICTION AT PACKAGE ONE PROPERTY DEVELOPMENT AT TUEN MUN AREA 16**	**A-2601**	ALKF+ ANDREW LEE KING FUN & ASSOCIATES ARCHITECTS LTD
	Date **OCTOBER 2026**			



Photomontage - OZP Compliant Scheme (For Reference Only)



Photomontage - Proposed Scheme



Key Plan

Viewpoint Elevation: +287.10mPD
Viewing Distance: ~1350m

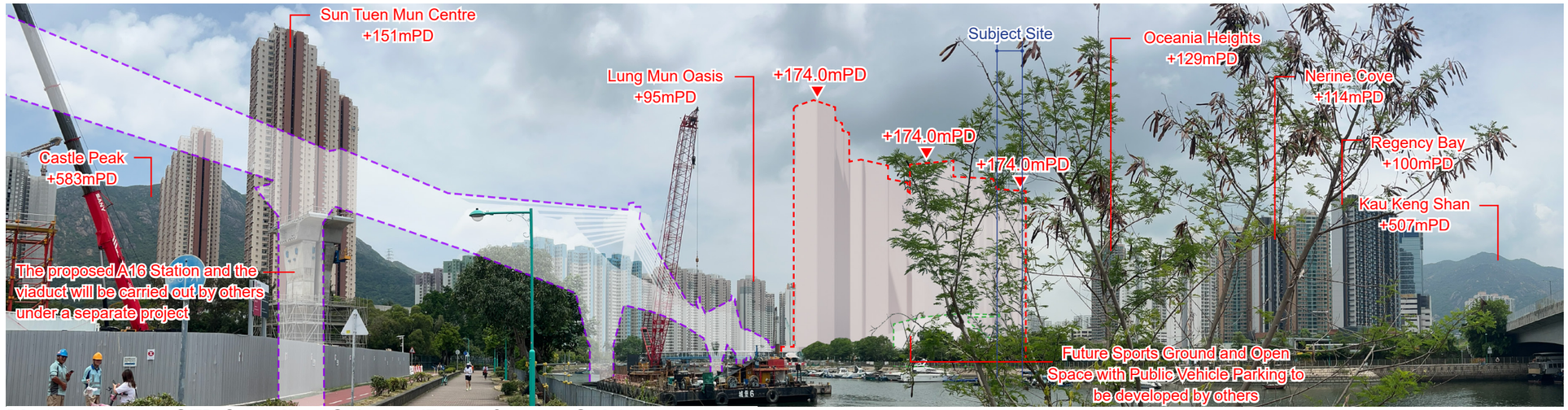
SUBJECT SITE

PROPOSED DEVELOPMENT

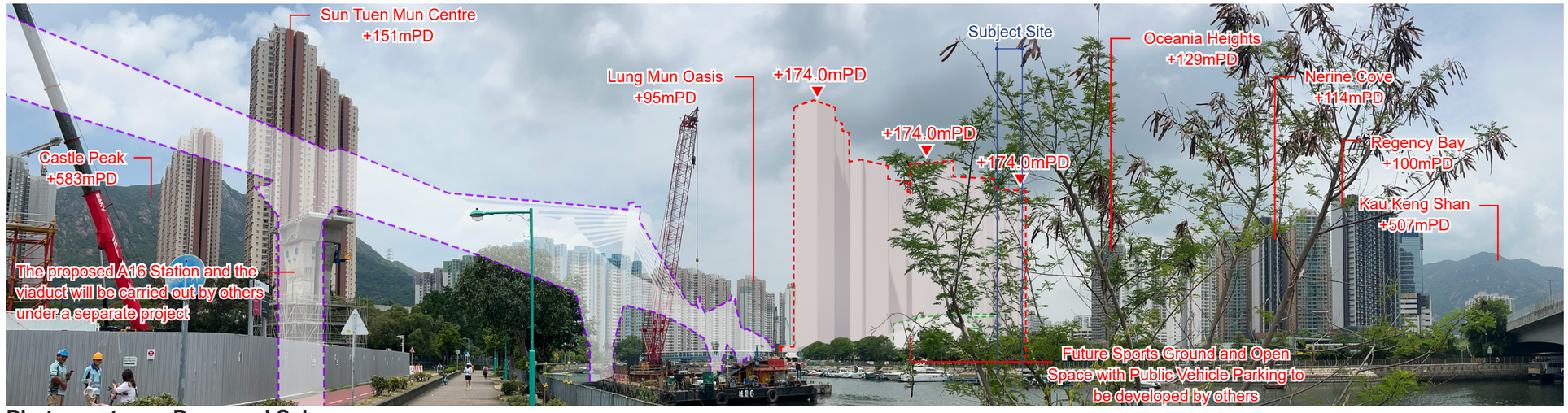
OTHER PACKAGES OF THE SITE

Drawing Title **FIGURE 4.7 - PHOTOMONTAGE OF VIEWPOINT 5: VIEW SOUTHEAST FROM CASTLE PEAK HIKING TRAIL**	Scale **N.T.S.** Date **OCTOBER 2026**	Project **PROPOSED MINOR RELAXATION OF BUILDING HEIGHT RESTRICTION AT PACKAGE ONE PROPERTY DEVELOPMENT AT TUEN MUN AREA 16**	Job No. **A-2601**

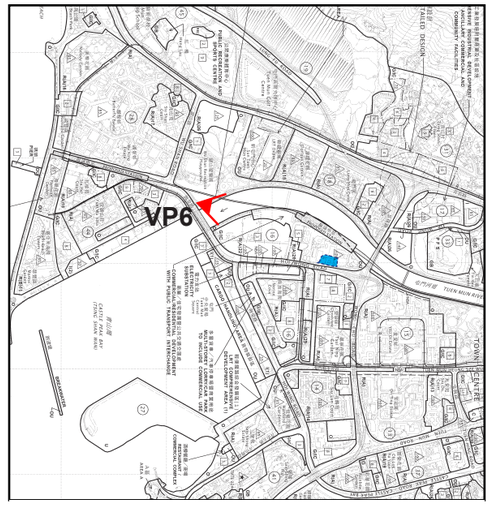
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ANDREW LEE KING FUN & ASSOCIATES ARCHITECTS LTD



Photomontage - OZP Compliant Scheme (For Reference Only)



Photomontage - Proposed Scheme



Key Plan

Viewpoint Elevation: +4.10mPD
Viewing Distance: ~150m

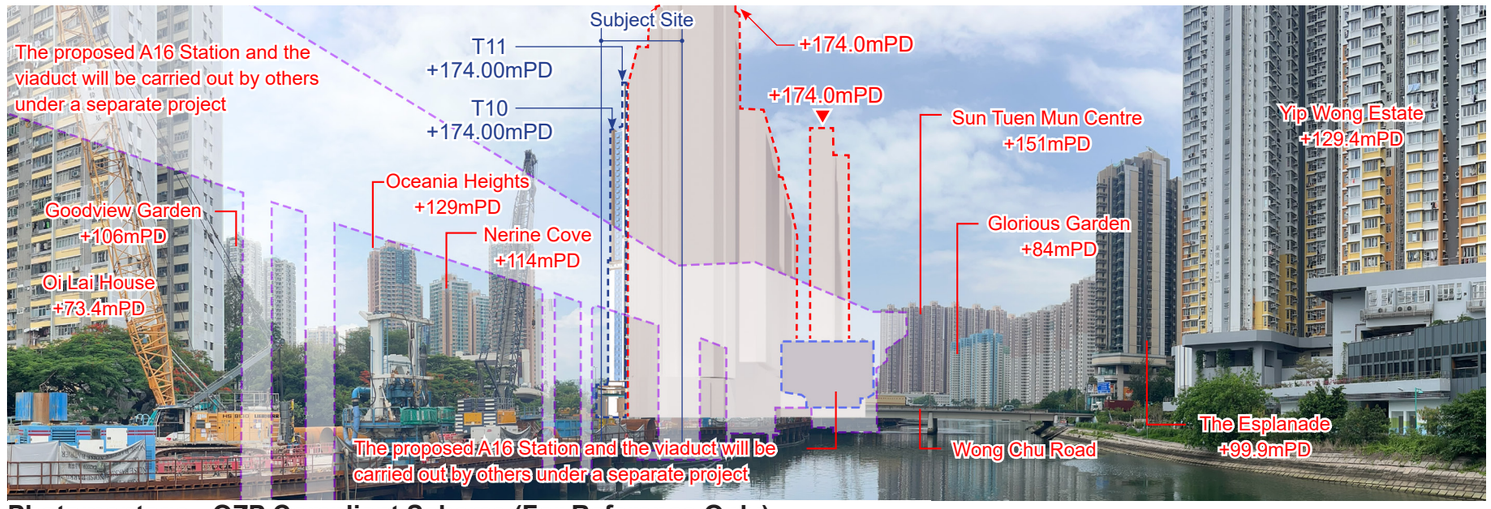
SUBJECT SITE

PROPOSED DEVELOPMENT

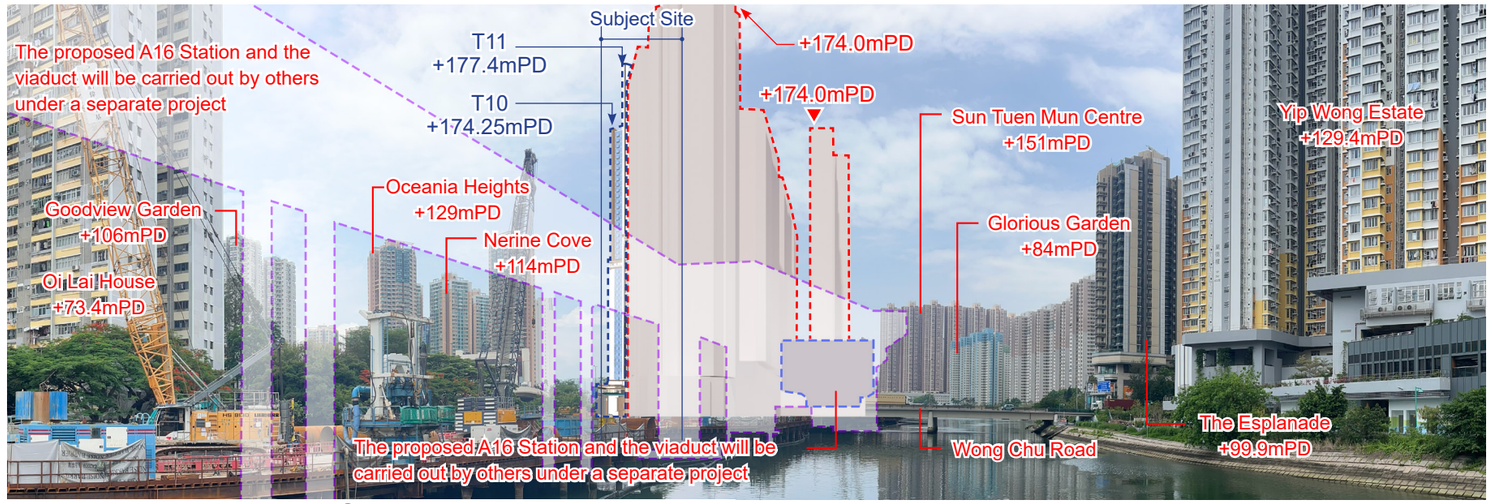
OTHER PACKAGES OF THE SITE

THE PROPOSED A16 STATION AND THE VIADUCT WILL BE CARRIED OUT BY OTHERS UNDER A SEPARATE PROJECT

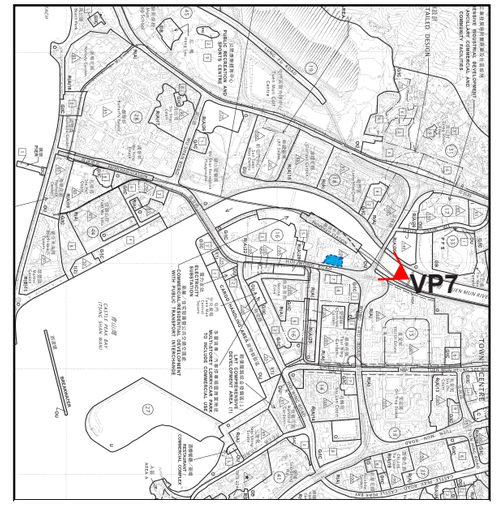
Drawing Title	Scale	Project	Job No.	
FIGURE 4.8 - PHOTOMONTAGE OF VIEWPOINT 6: VIEW NORTHEAST FROM THE ENTRANCE OF WU SHAN RECREATION PLAYGROUND	**N.T.S.**	**PROPOSED MINOR RELAXATION OF BUILDING HEIGHT RESTRICTION AT PACKAGE ONE PROPERTY DEVELOPMENT AT TUEN MUN AREA 16**	**A-2601**	ALKF+ ANDREW LEE KING FUN & ASSOCIATES ARCHITECTS LTD
	Date **OCTOBER 2026**			



Photomontage - OZP Compliant Scheme (For Reference Only)



Photomontage - Proposed Scheme



Key Plan

Viewpoint Elevation: +7.50mPD
Viewing Distance: ~205m

SUBJECT SITE

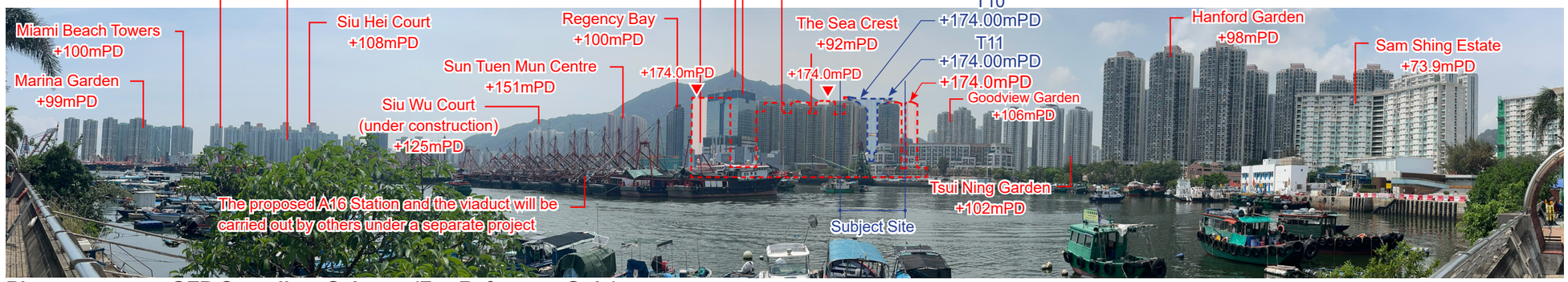
PROPOSED DEVELOPMENT

OTHER PACKAGES OF THE SITE

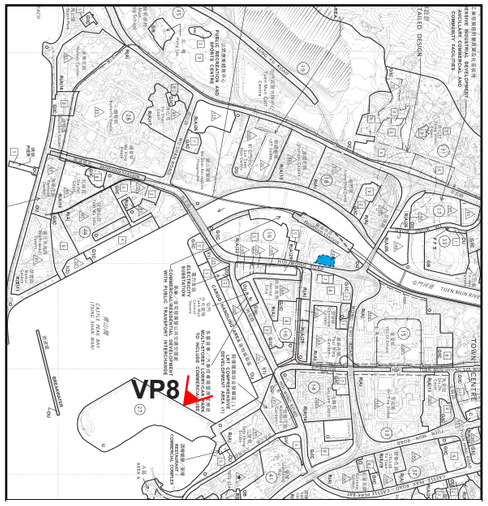
THE PROPOSED A16 STATION AND THE VIADUCT WILL BE CARRIED OUT BY OTHERS UNDER A SEPARATE PROJECT

Drawing Title **FIGURE 4.9 - PHOTOMONTAGE OF VIEWPOINT 7: VIEW SOUTHWEST FROM FOOTBRIDGE ACROSS THE TUEN MUN RIVER CHANNEL NEAR YAU OI ESTATE**	Scale **N.T.S.** Date **OCTOBER 2026**	Project **PROPOSED MINOR RELAXATION OF BUILDING HEIGHT RESTRICTION AT PACKAGE ONE PROPERTY DEVELOPMENT AT TUEN MUN AREA 16**	Job No. **A-2601**

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Photomontage - OZP Compliant Scheme (For Reference Only)



Key Plan

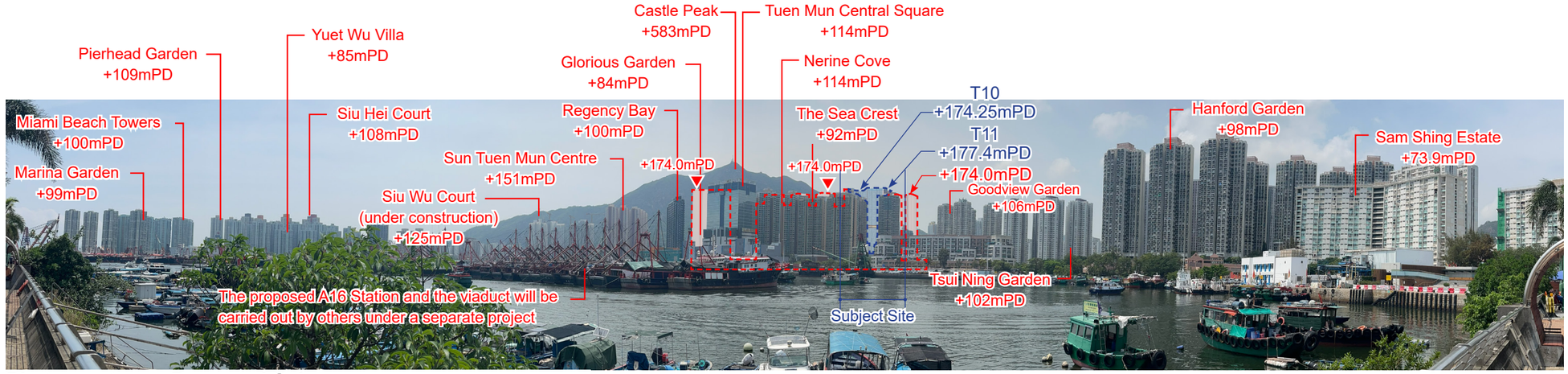
Viewpoint Elevation: +4.30mPD
Viewing Distance: ~900m

SUBJECT SITE

PROPOSED DEVELOPMENT

OTHER PACKAGES OF THE SITE

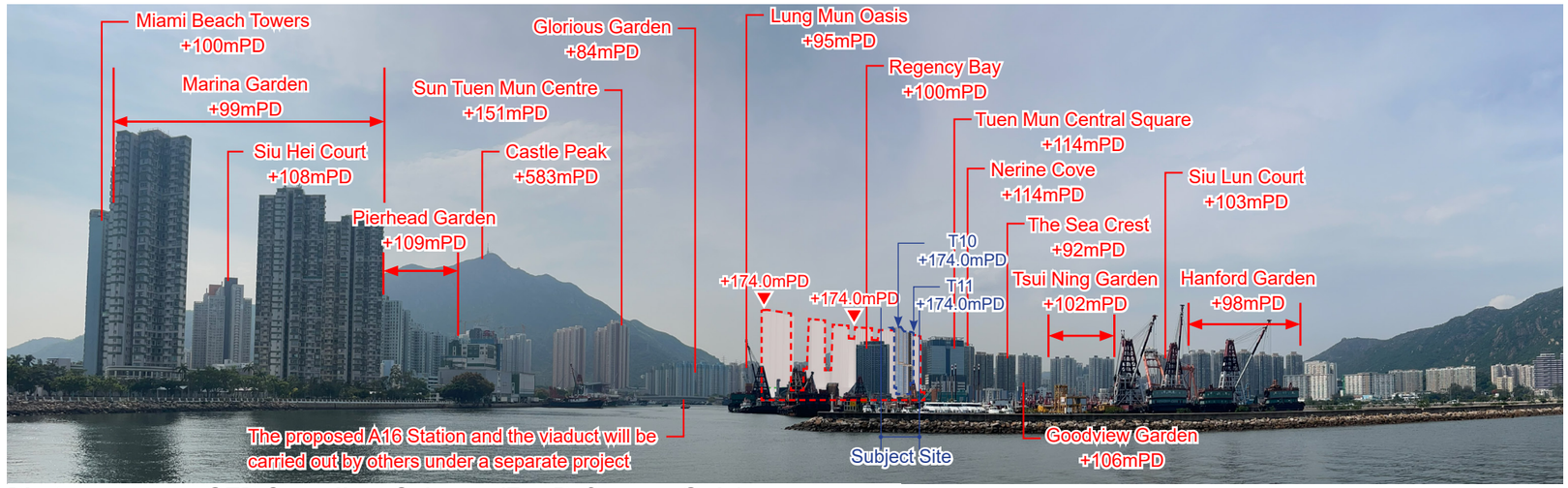
THE PROPOSED A16 STATION AND THE VIADUCT WILL BE CARRIED OUT BY OTHERS UNDER A SEPARATE PROJECT



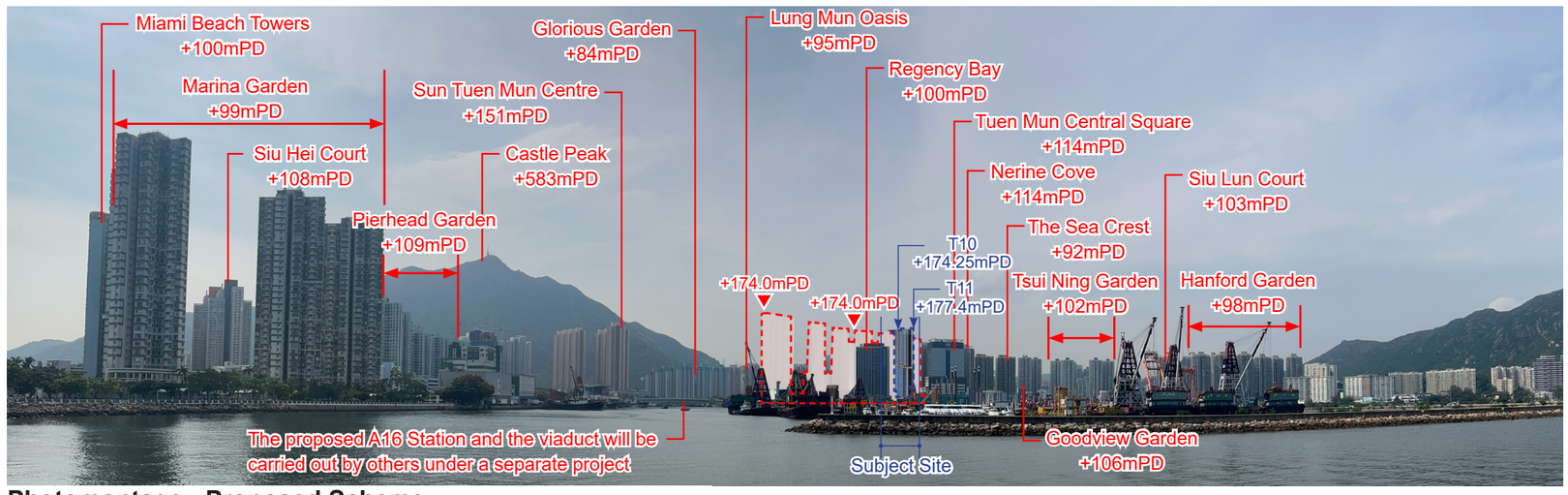
Photomontage - Proposed Scheme

Drawing Title **FIGURE 4.10 - PHOTOMONTAGE OF VIEWPOINT 8: VIEW NORTHWEST FROM CASTLE PEAK BAY WATERFRONT PROMENADE**	Scale **N.T.S.** Date **OCTOBER 2026**	Project **PROPOSED MINOR RELAXATION OF BUILDING HEIGHT RESTRICTION AT PACKAGE ONE PROPERTY DEVELOPMENT AT TUEN MUN AREA 16**	Job No. **A-2601**

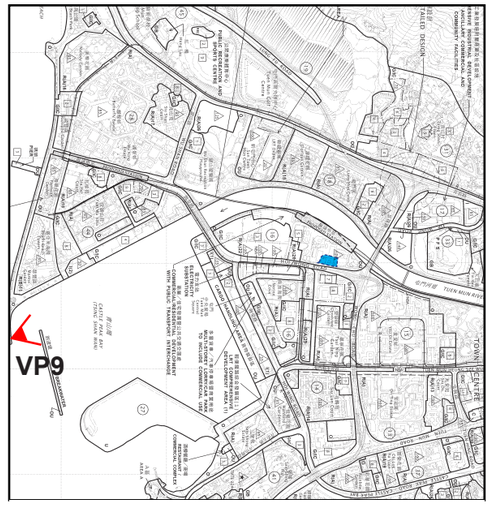
ANDREW LEE KING FUN & ASSOCIATES ARCHITECTS LTD



Photomontage - OZP Compliant Scheme (For Reference Only)



Photomontage - Proposed Scheme



Key Plan

Viewpoint Elevation: +5.00mPD
Viewing Distance: ~1390m

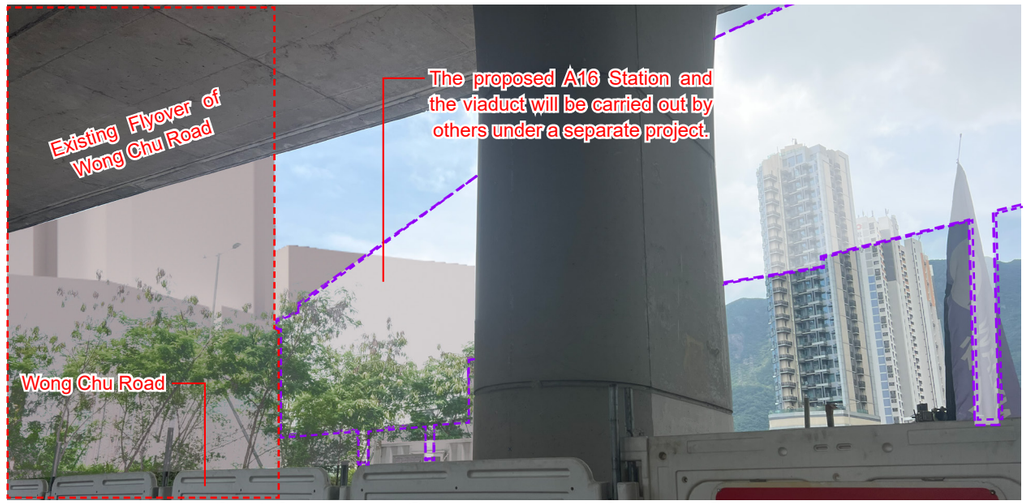
SUBJECT SITE

PROPOSED DEVELOPMENT

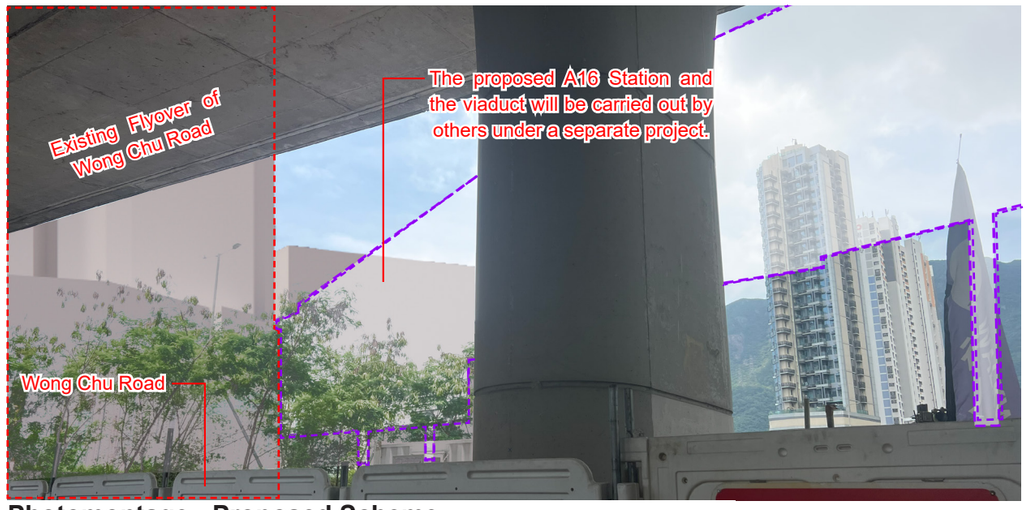
OTHER PACKAGES OF THE SITE

THE PROPOSED A16 STATION AND THE VIADUCT WILL BE CARRIED OUT BY OTHERS UNDER A SEPARATE PROJECT

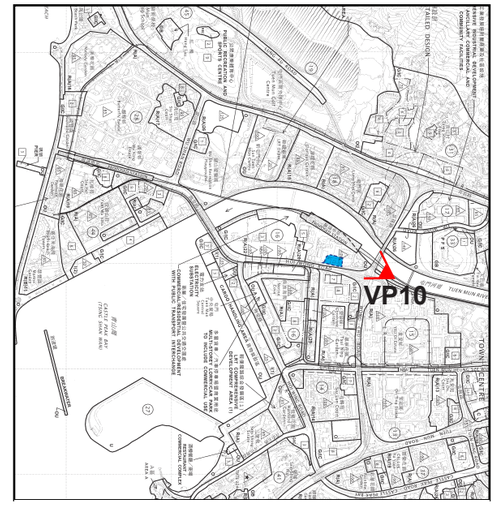
Drawing Title	Scale	Project	Job No.	
FIGURE 4.11 - PHOTOMONTAGE OF VIEWPOINT 9: VIEW NORTHWEST FROM TUEN MUN PROMENADE	**N.T.S.**	**PROPOSED MINOR RELAXATION OF BUILDING HEIGHT RESTRICTION AT PACKAGE ONE PROPERTY DEVELOPMENT AT TUEN MUN AREA 16**	**A-2601**	ALKF+ ANDREW LEE KING FUN & ASSOCIATES ARCHITECTS LTD
	Date **OCTOBER 2026**			



Photomontage - OZP Compliant Scheme (For Reference Only)



Photomontage - Proposed Scheme



Key Plan

Viewpoint Elevation: +5.40mPD
Viewing Distance: ~80m

SUBJECT SITE

PROPOSED DEVELOPMENT

OTHER PACKAGES OF THE SITE

THE PROPOSED A16 STATION AND THE VIADUCT WILL BE CARRIED OUT BY OTHERS UNDER A SEPARATE PROJECT

Drawing Title **FIGURE 4.12 - PHOTOMONTAGE OF VIEWPOINT 10: VIEW SOUTHWEST FROM TUEN MUN RIVER (EASTERN BANK) GARDEN**	Scale **N.T.S.** Date **OCTOBER 2026**	Project **PROPOSED MINOR RELAXATION OF BUILDING HEIGHT RESTRICTION AT PACKAGE ONE PROPERTY DEVELOPMENT AT TUEN MUN AREA 16**	Job No. **A-2601**

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ANDREW LEE KING FUN & ASSOCIATES ARCHITECTS LTD

4.2 Other Considerations

4.2.1 The Ground Investigation result indicates the presence of marine deposits soil stratum at approximately 5m below ground level, and the thickness varies from 8m to 17m. Such deposits are generally characterized by low shear strength, high compressibility, and low permeability, resulting in significant long-term settlement and poor bearing capacity. Excavation within marine deposits for basement construction poses stability concerns, including base heave and difficulty in forming a safe working platform. In addition, excavation and disposal of marine sediments are subject to stringent environmental and regulatory controls, leading to potential programme delays and safety concerns. If no basement is proposed, the marine deposit layer will remain largely undisturbed and will not adversely affect the foundation or building design. The proposed additional aboveground storeys and increased building height are therefore not expected to cause any adverse impacts. In view of above reasons, the basement construction within this weak marine deposit layer should be avoided.

5. DEVELOPMENT JUSTIFICATIONS AND MERITS

5.1 Proposed Scheme is in Line with the Government's Policy of Facilitating Aboveground Carpark Design for Private Development

5.1.1 The Proposed Scheme, is solely to relocate the carpark from the basement level to the aboveground level, with a minor increase in BH. Such a scheme refinement is in line with the latest Government's policy to facilitate the provision of the aboveground carpark in private development projects. As the policy is intended to reduce construction costs and facilitate project delivery, there would be anticipated reduction in construction time resulting from the aboveground carpark arrangement as compared with the original basement carpark scheme. Given that (i) no more than two levels of aboveground carparks has been proposed and (ii) the Applicant has prepared and submitted a visual appraisal (refer to Section 4 of the subject planning statement), the subject planning application observes the relevant requirements for seeking permission for a minor relaxation of BH restriction under the enhanced GFA exemption arrangements for carparks as promulgated in November 2025 in accordance with PNAP APP-2.

5.2 Proposed Minor Relaxation of Building Height is for the Incorporation of Aboveground Carparks only

5.2.1 Under the proposed scheme, the aboveground carpark is accommodated on the 1/F and 2/F of the proposed residential development. Unlike an underground carpark arrangement which could make use of virtually the entire Package One site to accommodate the required parking provision, the buildable footprint for the aboveground carpark is substantially constrained by various design requirements, as detailed in paragraph 3.3.1 (**Figure 3.8** refers).

5.2.2 Notwithstanding these constraints, the Proposed Scheme strives to accommodate the required parking spaces within 2 levels through optimization of structural layout, including minimizing the number of structural columns. This approach necessitates longer structural spans, resulting in a deeper structural zone and a corresponding increase in floor-to-floor height (FTFH). In this regard, the FTFH of the carpark floors has been optimised to accommodate a minimum clear headroom of 2.4m for private vehicle parking spaces, together with an approximately 1.5m structural zone and an approximately 1.1m building-services zone for essential E&M installations, including the mechanical exhaust system.

5.2.3 The proposed parking spaces are intended solely for residents of T10 and T11. All private car parking spaces, except loading/unloading spaces, will be equipped with EV charging-enabling infrastructure in accordance with PNAP APP-2 requirement.

5.2.4 The alignment of the internal estate roads has been refined with L/UL bays located in G/F between the lobbies of the two towers (**Figure 3.3** refers) to facilitate direct servicing access for the proposed development. The FTFH of the G/F has been optimised to accommodate the L/UL bays and associated circulation driveways for Heavy Goods Vehicles (HGVs), which require a minimum clear headroom of 4.7m, together with approximately 1.3m for the necessary structural and E&M zones.

5.2.5 Under the proposed scheme, the height of the clubhouse has been reduced from 5.45m to 5m. The E&M facilities, will be co-located with the clubhouse at 3/F and lobby entrance at G/F to minimise the overall BH of the proposed development.

5.2.6 In summary, the FTFHs of the individual podium floor are considered reasonable and proportionate to their intended operational and functional requirements. The footprint of the towers remains largely unchanged. The current design has struck a good balance to incorporate all design constraints and proposed design merits. The proposed minor relaxation of BH is therefore attributed solely to the provision of aboveground carparks.

5.3 Magnitude of Increase in Building Height is Minor

5.3.1 The Application Site is subject to a maximum BH restriction of 174mPD under the OZP. The proposed relaxation of BH of T10 by 0.25m (or about +0.14%) and of T11 by 3.4m (or about +1.95%) is minor in nature and by no means considered excessive.

5.3.2 Practicable measures have been explored to minimize the scale of increase in Building Height. For podium buildable footprint area, it has been optimized after offsetting the necessary common road, setback and building separation in accordance to statutory requirement and overall road system design. The tower buildable footprint area has also been optimized with consideration of necessary building setback from site boundary and adjacent phase development to comply with prescribed window requirement under Cap. 123F Building (Planning) Regulations and avoid overlooking of residential units.

5.4 In Line with the Urban Design Concept of Tuen Mun

5.4.1 The proposed minor relaxation of BH will not jeopardise the stepped BH profile under the subject OZP. The BH of Area 16 will still be able to gradually step down from the east to the west towards the riverfront of Tuen Mun River Channel and respecting the waterfront setting of Tuen Mun Typhoon Shelter under the Proposed Scheme. The five major Urban Design Concepts are safeguarded in the Proposed Scheme.

5.4.2 Also, the Proposed Scheme maintained wind enhancement features such as building separations and array of building blocks within the development to minimise the potential impacts to the surrounding wind environment. No Significant change to the air ventilation aspect is anticipated.

5.5 No Significant Changes in Visual Aspects

5.5.1 According to the Visual Appraisal as provided in Section 4.1, it is concluded that the overall visual impact induced by the Proposed Scheme due to the minor relaxation of BH by 0.25m (or about +0.14%) and 3.4m (or about +1.95%) for T10 and T11 respectively is considered negligible compared to the OZP compliant scheme.

5.6 Marine Deposit Layer Found 5m Below Ground Level Unfavour to Underground Carpark

5.6.1 The Ground Investigation result indicates the presence of marine deposits soil stratum at approximately 5m below ground level, and the thickness varies from 8m to 17m. Such deposits are generally characterized by low shear strength, high compressibility, and low permeability, resulting in significant long-term settlement and poor bearing capacity. Excavation within marine deposits for basement construction poses stability concerns, including base heave and difficulty in forming a safe working platform. In addition, excavation and disposal of marine sediments are subject to stringent environmental and regulatory controls, leading to potential programme delays and safety concerns. In view of above reasons, the basement construction within this weak marine deposit layer should be avoided.

5.7 Design Merits are Proposed

5.7.1 The Proposed Scheme will incorporate a range of design measures to enhance air ventilation, visual permeability and the overall streetscape. At-grade landscape planters and vertical greening at podium level are also proposed in accordance with the Sustainable Building Design Guidelines under PNAP APP-152 to enhance the pedestrian environment and provide visual relief. In addition, an east-west opening

(in 30m width x 6m floor to floor height) at the ground floor and naturally ventilated aboveground carparks with open façades are incorporated to further improve visual connectivity and natural ventilation across the site.

5.7.2 Besides, an air corridor of not less than 15m in width is maintained, extending partially across the southern portion of the Application Site and a building setback of 3m to 5m along the eastern boundary fronting Hoi Wong Road is proposed. These design provisions are intended to enhance air circulation and visual permeability along the interface with Hoi Wong Road, thereby minimising potential impacts on the surrounding environment (Merits 1 and 2 of **Figure 3.10** refer).

5.7.3 Appropriate mitigation measures will be implemented to address potential air quality and noise impacts associated with the aboveground carparks. With respect to air quality, as aforementioned, the proposed carpark on the First Floor and Second Floor will remain naturally ventilated through openings, thereby reducing the accumulation of vehicle emissions.

5.7.4 Regarding noise impact, a Noise Impact Assessment will be submitted to Environmental Protection Department (EPD) in accordance with Special Condition (SC) Clause 87 of the Land Grant. Any recommended noise mitigation measures arising from the assessment will be incorporated into the detailed design and implemented accordingly.

5.8 No Other Technical Impacts Anticipated

5.8.1 Since the Proposed Scheme conforms to the planning intention, land uses and GFA restriction of the OZP, the proposed minor relaxation of BH for the Application Site 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 in support of the proposed minor relaxation of maximum BH restriction for permitted flat use in “OU(C/R with PTI)” zone on the Draft Tuen Mun OZP No. S/TM/42 for Package One Property Development under S16 of the Town Planning Ordinance (CAP. 131).

6.2 The subject application is supported by the following justifications and merits:

- the Proposed Scheme is in line with the Government’s policy of facilitating aboveground carpark arrangement for private developments;
- the proposed minor relaxation of building height restriction is for the incorporation of the aboveground carparks only;
- the proposed magnitude of increase in building height is minor;
- the Proposed Scheme with a minor increase in building height, is in line with the urban design concept of the Tuen Mun Area with air ventilation / view corridor preserved and the stepped height concept descending from the east to the west towards the riverfront of Tuen Mun River Channel maintained;
- the Proposed Scheme has no significant change in visual aspects;
- the Ground Investigation result of the application site indicates the presence of marine deposits soil stratum at approximately 5m below ground level, and the thickness varies from 8m to 17m. The basement construction within this weak marine deposit layer should be avoided;
- design merits have been proposed; and
- no other technical impacts are anticipated, as the Proposed Scheme conforms to the planning intention, land uses and maximum GFA restrictions of the OZP.

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