

**Proposed Minor Relaxation of Building Height Restriction for Permitted Flat in
“Residential (Group A) 1” Zone at Various Lots in D.D. 120 and
Adjoining Government Land, Kung Um Road, Yuen Long
(Planning Application No. A/YL/331)**

Comments	Responses																																
Comments from District Planning Officer / Tuen Mun & Yuen Long West, Planning Department (received on 11 May 2026) (Contact: Ms Carmen CHEUNG; Tel.: 2158 6333)																																	
(i) Please submit drawing(s) (and further written explanation where applicable) showing the proposed design measures as indicated in the supplementary planning statement section 3.2.	The proposed design measures have been included in the updated Supporting Planning Statement (Annex A refers).																																
(ii) When compared with the OZP conforming scheme, it is observed that the floor-to-floor height (FTFH) of G/F and 1/F of Tower 2 has increased from 5m to 6.25m, while the FTFH of G/F of Tower 1 has increased from 5m to 7.5m, hence an overall increase of 2.5m in absolute building height for both towers. Please provide justifications on why an increase of 1.25m each at G/F and 1/F of Tower 2, and 2.5m at G/F of Tower 1 is required in the proposed scheme.	Upon further review, the FTFH of G/F and 1/F of Tower 2 for the Proposed Scheme has been adjusted from 6.25m to 5m. For Tower 1, the increase in FTFH of G/F from 5m to 7.5m is required to accommodate the additional level of carpark (each with a FTFH of 3.75m). Upon the adjustment, the building height (at main roof) of the Proposed Scheme would be reduced to 92.45mPD, which is the same as that of the Conforming Scheme (Annex A refers).																																
(iii) With reference to the comments from Buildings Department below (Please refer to P.4-5), a general building plan (GBP) submission has been approved by the Building Authority on 2.4.2026. The following differences between the GBP scheme and proposed scheme are observed:	The initial GBP submission approved in April adhered strictly to the 25-storey limit stipulated under the Outline Zoning Plan (OZP). In anticipation of a planning application for a minor relaxation of the building height restriction, which is currently in progress, the approved set of GBPs has adopted a conservative baseline scheme designed with no basement car park, one fewer storey of typical floor and a reduced total GFA, so that it ensures statutory compliance in the interim while preserving the flexibility to optimize the development’s full potential once the planning approval is secured.																																
	<table border="1"> <thead> <tr> <th></th> <th>OZP Conforming Scheme</th> <th>Proposed Scheme under s.16</th> <th>Approved GBP on 2.4.2026</th> </tr> </thead> <tbody> <tr> <td>Site Area (m²)</td> <td colspan="3">8,235</td> </tr> <tr> <td>Domestic PR</td> <td>5</td> <td>5</td> <td>4.78</td> </tr> <tr> <td>GFA (m²)</td> <td>41,175</td> <td>41,175</td> <td>39,403.181</td> </tr> <tr> <td>Building height (main roof)</td> <td>92.45 mPD</td> <td>94.95 mPD</td> <td>89.3 mPD</td> </tr> <tr> <td>No. of storeys</td> <td>25</td> <td>26</td> <td>25</td> </tr> <tr> <td>No. units</td> <td>1,035</td> <td>1,035</td> <td>1,012</td> </tr> <tr> <td>Average unit size (m²)</td> <td>39.8</td> <td>39.8</td> <td>--</td> </tr> </tbody> </table>		OZP Conforming Scheme	Proposed Scheme under s.16	Approved GBP on 2.4.2026	Site Area (m ²)	8,235			Domestic PR	5	5	4.78	GFA (m ²)	41,175	41,175	39,403.181	Building height (main roof)	92.45 mPD	94.95 mPD	89.3 mPD	No. of storeys	25	26	25	No. units	1,035	1,035	1,012	Average unit size (m ²)	39.8	39.8	--
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Comments				Responses
No. of carparking spaces				
- Private Cars	188	188	178	
- Motorcycle	13	13	14	
- L/UL Bay	2	2	2	
FTFH	- G/F to 1/F: 5m - Flat: 3.15m	Tower 1: - G/F: 3.75m to 7.5m - M/F: 3.75m - 1/F: 5m Tower 2: - G/F to M/F: 3.75m to 6.25m - 1/F: 5m to 6.25m - Flat: 3.15m	Tower 1: - LG/F: 3.75m - M/F: 2.75m Tower 2: - G/F: 5m - 1/F: 5m - Flat: 3.15m	
<p>The approved GBP is for residential development consisting two 22-storey residential towers (i.e. Tower 1 and Tower 2) above a two (for Tower 2) to three-storeys podium (for Tower 1) without basement carpark/floor (i.e. a 25-storeys building for Tower 1 and a 24-storeys building for Tower 2). The three-storeys podium also consists of Mezzanine floor with FTFH of 2.75m with similar floor layout design. As the GBP was approved on the basis of no basement carpark while complying with the statutory planning restrictions at a lower building height of 89.3mPD, the applicant should provide full justifications on why minor relaxation of building height restriction is required under the current proposed scheme and in addition, increase in FTFH of podium levels.</p>				
<p>Comments from the Chief Estate Surveyor / Lands Supply, Lands Department (received on 11 May 2026) (Contact Person: Ms Carey LIN; Tel.: 2155 2438)</p>				
(i)	The application site (“the Site”) comprises 14 old scheduled lots held under Block Government Lease demised for agricultural use and the adjoining Government land. A land exchange application was submitted by the land owner for implementing the proposed residential			Noted.

Comments	Responses
development at the Site. Such land exchange application would be dealt with by Lands Department acting in the capacity as the landlord at its sole discretion. If the land exchange application is approved by Lands Department, it would be subject to such terms and conditions including, among others, the payment of premium and administrative fee as may be imposed by Lands Department.	
(ii) Noting that aboveground parking spaces are proposed to be provided in the Site, Lands Department would follow the prevailing practice for “Gross Floor Area Exemption Arrangement for Aboveground Parking Spaces in Private Developments” under Lands Administration Office Practice Note No. 9/2025 to deal with the GFA exemption arrangement under lease.	Noted.
(iii) As regards the proposed carparking and loading and unloading provisions in the subject s.16 application, Lands Department would reserve comments on their compliance under lease for the proposed land exchange due to the absence of the flat mix and the GFA distribution among domestic GFA and non-domestic GFA (if any) which will be available at the detailed design stage.	Noted.
Comments from the Chief Engineer / Mainland North, Drainage Services Department (received on 11 May 2026) (Contact Person: Mr LOU Tai-yeong; Tel.: 3965 8929)	
(i) No objection in principle to the proposed application. The development should neither obstruct overland flow nor adversely affect existing natural streams, village drains, ditches and the adjacent areas, etc.	Noted.
Comments from Director of Fire Services (received on 11 May 2026) (Contact Person: Mr WONG Cheuk-kei; Tel.: 2733 7737)	
(i) Detailed fire safety requirements will be formulated upon receipt of a formal submission of Short Term Tenancy or Short Term Waiver, general building plans or referral of the application via the relevant licensing authority.	Noted.
(ii) The provision of emergency vehicular access in the subject work shall comply with the requirements as stipulated in Section 6, Part D of the Code of Practice for Fire Safety in Buildings 2011.	Noted.

Comments	Responses
Comments from the Chief Engineer / Construction, Water Supplies Department (received on 11 May 2026) (Contact Person: Mr. Jeffery HO; Tel.: 2152 5740)	
(i) No objection to the application.	Noted.
(ii) Existing water mains will be affected as shown on the plan (Annex II). The cost of any necessary diversion shall be borne by the proposed development.	Noted.
(iii) In case it is not feasible to divert the affected water mains, a waterworks reserve within 1.5 metres from the center line of the water main shall be provided to Water Supplies Department. No structure shall be built or materials stored within this waterworks reserve. Free access shall be made available at all times for staff of the Director of Water Supplies or their contractor to carry out construction, inspection, operation, maintenance and repair works.	Noted.
(iv) No trees or shrubs with penetrating roots may be planted within the Waterworks Reserve or in the vicinity of the water main shown on the plan.	Noted.
(v) Government shall not be liable to any damage whatsoever and howsoever caused arising from burst or leakage of the public water mains within and in close vicinity of the site.	Noted.
Comments from the Chief Building Surveyor / New Territories West, Buildings Department (received on 11 May 2026) (Contact Person: Ms Yolly LAU; Tel.: 2626 1435)	
(i) According to our record, there is a general building plan approval granted by the Building Authority (BA) on 2 April 2026 at the Site.	Noted.
(ii) The site shall be provided with means of obtaining access thereto from a street and emergency vehicular access in accordance with Regulations 5 and 41D of the Building (Planning) Regulations (B(P)R) respectively.	Noted.
(iii) The site abuts on a specified street (Kung Um Road) of not less than 4.5m wide. Its permitted development intensity shall be determined under the First Schedule of the B(P)R at the building plan submission stage.	Noted.
(iv) For unauthorized building works (UBW) erected on leased land, enforcement action may be taken by the Buildings Department to effect their removal in accordance with the prevailing enforcement policy against UBW as and when necessary. The granting of any planning approval should not be construed as an acceptance of any	Noted.

Comments	Responses
existing building works or UBW on the application site under the Buildings Ordinance (BO).	
(v) If the proposed plot ratio is based on the assumption that gross floor area (GPA) exemption will be granted for green/amenity features and non-mandatory/non-essential plant rooms, etc., the pre-requisites in Practice Note for Authorized Persons, Registered Structural Engineers and Registered Geotechnical Engineers (PNAP) APP-151 and APP-152 should be complied with.	Noted.
(vi) If the covered carpark & loading and unloading spaces including those provided above ground and proposed to be disregarded from GPA calculation under the Regulation 23(3) of the B(P)R shall be subject to the requirements laid down in Practice Notes for Authorized Persons, Registered Structural Engineers and Registered Geotechnical Engineers (PNAP) APP-2 and PNAP APP-111.	Noted.
(vii) The ratio of parking spaces for disabled persons specified therein should comply with the ratio of accessible parking spaces required under regulation 72 of B(P)R and Division 3 of the Design Manual: Barrier Free Access 2008.	Noted.
(viii) Any temporary shelters or converted containers for office, storage, washroom or other uses are considered as temporary buildings are subject to the control of Part VII of the B(P)R.	Noted.
(ix) Detailed checking under the BO will be carried out at building plan submission stage.	Noted.
Comments from the Director of Food and Environmental Hygiene (received on 11 May 2026) (Contact Person: Mr Raymond CHAN; Tel.: 3141 1231)	
(i) No Food and Environmental Hygiene Department's (FEHD) facilities should be affected.	Noted.
(ii) Proper licence / permit issued by this Department is required if there is any food business / catering service / activities regulated by the Director of Food and Environmental Hygiene (DFEH) under the Public Health and Municipal Services Ordinance (Cap. 132) and other relevant legislation for the public. In accordance with Section 4 of Food Business Regulation, Cap.132X, the expression 'food business' means any trade or business for the purpose of which any person engages in the handling of food or food is sold by means of a vending machine but does not include any canteen in work place (other than a factory canteen referred to in section 31) for the use exclusively of the	Noted.

Comments	Responses
<p>persons employed in the work place. As such, a staff canteen that exclusively use by the staff members of that working place does not require a food business licence from this department. However, if the said canteen provided foods to the outsiders with payment, a food business licence is required. Pursuant to section 4 of the Food Business Regulation (Cap. 132X), the expression of "food business" does not include any club. However, permission to sell restricted foods, such as milk, frozen confections, non-bottled drinks, cut fruit, sushi and sashimi etc., specified in Schedule 2 to the Food Business Regulation, Cap. 132X, is still required.</p>	
<p>(iii) Proper licence issued by this Department is required if related place of entertainment is involved. Any person who desires to keep or use any place of public entertainment for example a theatre and cinema or a place, building, erection or structure, whether temporary or permanent, on one occasion or more, capable of accommodating the public presenting or carrying on public entertainment within Places of Public entertainment (PPE) Ordinance (Cap. 172) and its subsidiary legislation, such as a concert, opera, ballet, stage performance or other musical, dramatic or theatrical entertainment, cinematograph or laser projection display, a circus, a lecture or story-telling, an exhibition of any 1 or more of the following, namely, pictures, photographs, books, manuscripts or other documents or other things, a sporting exhibition or contest, a bazaar, a dance part or an amusement ride and mechanical device which is designed for amusement, a Place of Public Entertainment Licence (or Temporary Place of Public Entertainment Licence) should be obtained from FEHD whatever the general public is admitted with or without payment.</p>	<p>Noted.</p>
<p>(iv) A swimming pool licence must be obtained from FEHD for any artificially constructed pool used for swimming or bathing and to which the public have access (whether on payment or otherwise) or which is operated by any club, institution, association or other organization. A swimming pool licence is not required for any swimming pool which serves not more than 20 residential units and to which the public have no access.</p>	<p>Noted.</p>
<p>(v) There should be no encroachment on the public place and no environmental nuisance should be generated to the surroundings. Its state should not be a nuisance or injurious or dangerous to health and</p>	<p>Noted.</p>

Comments	Responses
surrounding environment. Also, for any waste generated from such activities/ operation, the applicant should arrange disposal properly at their own expenses.	
(vi) If provision of cleansing service for new public roads, streets, cycle tracks, footpaths, paved areas etc, is required, FEHD should be separately consulted. Prior consent from FEHD must be obtained and sufficient amount of recurrent cost may have to be provided to us.	Noted.
(vii) If domestic waste collection service of FEHD is required in future, prior comments from this Department on the waste collection plan, including the accessibility and maneuverability of RCV to RCP, should be sought.	Noted.
Comments from the Chief Town Planner / Urban Design and Landscape, Planning Department (received on 11 May 2026) (Contact Person: Mr Jason KO; Tel.: 3565 3941)	
On the Visual Appraisal (VA), some observations/ comments were provided below: Photomontage (i) VP1 – the planned residential development (about +89.75 mPD) (i.e. Y/YL/20) is located behind the Emerald Green, which should not be visible from this viewpoint.	Noted. The Visual Appraisal has been updated.
Comments from District Planning Officer / Tuen Mun & Yuen Long West, Planning Department (received on 15 May 2026) (Contact: Ms Carmen CHEUNG; Tel.: 2158 6333)	
We have the following comments on the Master Layout Plan (MLP): (i) It is observed that the pink hatched blue area and pink hatched blue stripped black area on the MLP extend to Park Signature and appear to affect the internal access road or local track road. Please clarify the purpose, the use and/or arrangement of the aforementioned area.	Please be advised the Pink Hatched Blue Area (PHBA) on the MLP are demarcated in strict accordance with the latest draft lease plan of the proposed land exchange. No building or structure or support for building or structure shall be erected on, over, under above, below or within the PHBA.
(ii) Please provide further details on the edged pecked blue area for deferred possession. The applicant should also clarify the arrangement of the proposed bicycle parking spaces provision.	As per the draft lease conditions of the proposed land exchange, the project proponent will be given the possession of the area demarcated edged pecked blue in the MLP not later than 1 January 2029. Open bicycle parking and fence wall / fencing on the boundary will be formed / erected, prior to completion of the development.
(iii) Please clarify the purpose of indicating the centreline of the street on Kung Um Road.	The centreline of the street is indicated to demonstrate compliance with the requirement of Building Setback under Sustainable Building Design (SBD) Guidelines.

Public Comments received During the 3-week Statutory Public Consultation Period

Comments	Responses
<p><u>Fire Hazard Concerns</u></p> <ul style="list-style-type: none"> The proposed buildings are too close to the towers of the existing residential developments which may pose fire hazard concerns. Close proximity of the new buildings to existing residential units could make emergency vehicle access and fire rescue more challenging. 	<p>To minimise the impact to the adjacent residential neighbourhood (such as La Grove and Park Signature), the tower blocks have been purposely designed to maximize building setbacks from surrounding residential blocks. The Proposed Development will strictly comply with all relevant statutory fire safety regulations and the Buildings Ordinance. EVA would be provided in accordance with the Code of Practice for Means of Access for Firefighting and Rescue.</p>
<p><u>Traffic Concerns</u></p> <ul style="list-style-type: none"> Kung Um Road (公庵路) and Shap Pat Heung Road (十八鄉路) are already heavily congested during peak hours. Additional residents and vehicles would overwhelm the existing road network and there are insufficient improvement measures from the proposal. The area lacks a public transport terminal, has only a few bus routes and is not served by the MTR. Adding over 1,000 new flats will dramatically increase the number of vehicles and residents, further straining the already inadequate transport infrastructure. 	<p>A Traffic Impact Assessment was conducted in support of the Land Exchange Application and the results indicated there would not be any adverse impact to the surrounding road network due to the Proposed Development.</p> <p>Public transport demand was also assessed. The current public transport provisions would meet the need of the increased population.</p>
<p><u>Inadequate Community Facilities</u></p> <ul style="list-style-type: none"> There are already shortage in parking spaces, public space and community service in the area. The increase in population will further deteriorate the living quality. 	<p>The Site is zoned “Residential (Group A) 1” which is intended for high-density residential development. As there is no increase in the total domestic plot ratio, it is anticipated that the Proposed Development would not introduce additional planned population to the area.</p> <p>Furthermore, the internal transport facilities, including 188 private car parking spaces, 13 motorcycle parking spaces, and 2 loading/unloading bays will meet the parking need of the future residents without placing any additional burden on the existing parking resources of the surrounding neighbourhood.</p>
<p><u>Air Ventilation Concerns</u></p> <ul style="list-style-type: none"> Potential “wall effect” from proposed high-rise buildings and reduce natural wind flow and affect air circulation of the surrounding residential developments. 	<p>The layout of the Proposed Development has been carefully designed to avoid “wall effect”. The scheme comprises two residential towers with a separation of approximately 30m. which would facilitate wind penetration, enhance visual permeability, and preserve natural air circulation for surrounding developments.</p>

Comments	Responses
<p><u>Obstruction of Natural Lighting and View</u></p> <ul style="list-style-type: none"> The relaxation in building height restriction would affect the natural lighting and view of existing residential development. The proposed buildings could cast shadows on existing residential units, potentially reducing natural sunlight and affecting living comfort 	<p>With the 30m wide building separation and building setback from the surrounding residential blocks, the disposition of the towers has purposely minimized the obstruction of views and natural lighting of the adjacent residential developments.</p>
<p><u>Incompatibility with Adjacent Developments</u></p> <ul style="list-style-type: none"> The adjacent area are mainly low-to-medium density development and the approval of the Planning Application for minor relaxation of building height restriction would lead to an incompatible development with the surrounding context. 	<p>The Application Site is located within the "Residential (Group A) 1" "R(A)1" , which is intended for high-density residential development. The site is immediately bounded by existing medium-rise developments within the same "R(A)1" zone, including La Grove and Park Signature. Although the Planning Application involves minor relaxation of building height restriction from 25 to 26 storeys, the absolute building height would remain unchanged as that of the Conforming Scheme. The Proposed Development would be compatible with the adjacent low to medium-rise residential development.</p>
<p><u>Infrastructural Concerns</u></p> <ul style="list-style-type: none"> The existing drainage, sewerage network and community facilities were planned in accordance with the needs of Park Signature and La Grove. The existing infrastructure may not be able to support the Proposed Development. 	<p>The Site has always been zoned "Residential (Group A) 1" with the planning intention for high density residential development and the existing infrastructure should have already catered for the Proposed Development. Nevertheless, various technical assessments have been carried out to ensure the technical feasibility of the proposed development.</p>
<p><u>Bicycle Facilities</u></p> <ul style="list-style-type: none"> The bicycle parking spaces are located on Government Land. These facilities should be shared use by the public. 	<p>The bicycle parking spaces are provided within the subject lot for use by the future residents.</p>
<p><u>Inconsistent Land Use Rationale</u></p> <ul style="list-style-type: none"> Turning a site that was previously allocated for rest and entertainment into housing appears to be an unreasonable reallocation of community resources. 	<p>The Site has always been zoned "Residential (Group A) 1" with the planning intention for high density residential development. Hence, there has not been any change in the land use.</p>

Compiled by: KTA
Date: 27 May 2026