Co	omments	Response
1.	Comments of the District Planning Officer/Sha Tin, Tai Po and North, Planning	
	Department as follows:	
	I refer to the subject application received on 17.1.2025 with the application form and the	
	Supporting Planning Statement. Please find the comments from the district planning	
	perspective below.	
	Supporting Planning Statement	
	General Comments	
1	1. The application site (the Site) with a site area of 1,494.67m2 mainly falls within	Noted.
	"Agriculture" ("AGR") zone (about 98.6% of the Site) with a minor portion in "Green	
	Belt" ("GB") zone (about 1.4% of the Site) on the approved Ting Kok Outline Zoning	
	Plan (OZP) No. S/NE TK/19. The applicant proposes rezoning the Site from "AGR"	
	and GB" zones to "Government, Institution or Community" ("G/IC") zone on the OZP	
	to take forward the development of a proposed Residential Care Home for the Elderly	
	(RCHE). According to the Notes of the OZP, the RCHE as a kind of 'Social Welfare	
	Facility' is always permitted in "G/IC" zone.	
2	2. According to the Notes of the OZP, the planning intention of the "GB" zone is	The GB portion accounts for only 1.4% of the site area and would be designated as garden area.
	primarily for defining the limits of urban and sub urban development areas by natural	In order to maintain the integrity of the Site, we propose to keep and rezone the "GB" portion site
	features and to contain urban sprawl as well as to provide passive recreational outlets.	area in one go.

Comments	Response	
There is a general presumption against development within the "GB" zone. It is noted		
that only a very minor portion of the Site falls within the "GB" zone (about 1.4% of		
the Site), which is currently proposed as greenery area without no proposed building		
footprint. For determining the site boundary, you may wish to consider avoiding		
encroachment upon "GB" zone in the site boundary.		
Specific Comments		
3. Section 1.1.4 – According to the recent site inspection by our office, there may be	Refer to aerial photo and photos attached.	
some trees/vegetation along the northern/eastern boundary of the Site.		
- Please review and confirm whether there are any existing trees within the site	our Site on the Northwest side. Our Building Design have provided setback along such Boundary.	
boundary. If yes, please advise (i) the locations, number and species of existing	In addition, certain pruning would be carried out during the actual construction.	
trees by indication on relevant plans; (ii) whether the existing trees will be	(B) - The Greenery shown on Aerial Photos are simply groups of Shrubs instead of Tree.	
retained, transplanted or felled and (iii) the proposed number/area of new	\bigcirc - The Greenery shown on Aerial Photos are simply groups of Shrubs instead of Tree.	
trees/compensatory planting.		
- Please review and advise whether any clearance of vegetation will be involved to		
facilitate the proposed development.		
4. Section 2.1.1 – The Site is accessible via a local track leading to Tung Tsz Road. It is	Since the existing track leading pass through some lots, a new access is proposed on the	
noted that private lots are involved within the concerned local track, in particular Lot	Government Land as per Figure 4 attached.	
250 RP in D.D. 23. Please advise whether consent from the private lot owner(s) has		

Comments		Response
	been obtained to ensure the future right of way to the Site.	
5.	Section 2.1.1 – It is noted that Lot 238 in D.D. 23 is not included in the site boundary.	R.O.W. would be provided to Lot 238 in D.D. 23.
	As the proposed development will separate this private lot with the local track leading	
	to Tung Tsz Road, please advise if right of way will be reserved for the owner(s) of	
	this private lot, or suggest the alternative arrangement.	
6.	Section 2.3 -Please provide more detailed explanation on the topographic restraints	Fire safety enhancement would be proposed for substandard EVA during the FSD submission. ie.
	leading to difficulties in complying with Building (Planning) Regulations 41 regarding	Fast-respond-type sprinkler head.
	the required width of emergency vehicular access.	
7.	Section 2.4 -Please advise whether there will be any shuttle bus services designated	Please be advised that shuttle bus services between the proposed RCHE and Tai Po Market Station
	for serving the proposed RCHE. If yes, the details of the routing, operation hours and	will be provided, please refer to Section 2.6 of the revised TIA report for the routing, operation
	frequency of shuttle bus should be provided.	hours and frequency of shuttle bus.
8.	Section 2.4 –Please confirm with Transport Department (TD) if the residents' bus route	Please note that NR532 is open to general public. Please be advised that the number of seats
	No. NR532 (Tai Po Market Station \leftrightarrow Tung Tsz Villas) is genuinely open to general	provided per residents' bus is 28 nos.
	public. Also please advise the number of seats provided per residents' bus.	The information could be found in the following website of the public domain:
		https://hkbus.fandom.com/wiki/%E5%B1%85%E6%B0%91%E5%B7%B4% E5%A3%ABNR
		532%E7%B7%9A
9.	Section 2.4 -It is noted that there are minibus and bus routes in vicinity of the Site,	Revised accordingly.
	please indicate the distances between the Site and the concerned minibus/bus stops on	

Comments	Response
Figure 5.	
10. Section 2.4 - The concerned minibus/bus stops are not located very close to the Site,	
while the future residents/visitors of the proposed RCHE will be required to walk to	
the Site from the concerned minibus/bus stops. It is noted that there is no proper	
footpath adjoining the Site, please advise how to ensure pedestrian/road safety of the	
future residents/visitors of the proposed RCHE (in particular elderly).	
- According to the further information received on 17.3.2025, for Figure 4 in the	(i) The proposed access road would not pass through any private lots but Government Land refer
responses to comments of the Social Welfare Department, please advise whether	to Figure 4. Consent would be applied to relevant Government Department.
the footpaths indicated on the figure are referring to the existing informal	(ii) Footpath and it's width are indicate on Figure 4.
footpaths or the footpaths proposed to be provided by the applicant. If they are	
referring to the footpaths proposed to be provided by the applicant, please advise	
(i) whether the consent(s) have been obtained from relevant owner(s) of any	
private lots and/or the Lands Department with respect to any Government land	
and (ii) the maintenance and management arrangements of the proposed	
footpaths. Nevertheless, it is noted that the widths of footpath varies from Tung	
Tsz Road to the Site, in which some parts are very narrow and could not be	
considered as proper access. Please review Figure 4 and indicate the widths of	
footpaths.	

Comments		Response	
11.	Section 3.1 - Please advise (i) the operation hours/visiting hours and (ii) tentative	re (i) Visting hours : 09:00 a.m. – 05:00 p.m.	
	completion year of the proposed RCHE.	(ii) Tentative completion year : December, 2028.	
12.	Section $3.1 - Please$ advise the estimated number of (i) employees; (ii) employees who	(i) Employee : 120 ppl; (ii) Overnight : 60 ppl; (ii) Visitors on daily basis : 152 ppl	
	need to stay overnight; and (ii) visitors on daily basis.		
13.	Section 3.1 – Please advise whether the proposed RCHE is intended to operate under	Subject to the discretion of the Future Operator.	
	the 'Enhanced Bought Place Scheme' of the Social Welfare Department.		
14.	Section 3.1.3 and 3.2.8 – Referring to the floor plan of 8/F in Figure 8 (i.e. G 07), there	Revised accordingly.	
	are only six rooms for staff quarters with two beds in each room, which is different		
	from these sections. Please clarify the inconsistency.		
15.	Section $3.1.5$ – Please also include the total number of beds in suites, isolated rooms	Revised accordingly and updated.	
	and staff quarters.		
16.	Section 3.2 – Please provide more sound justifications for the proposed building height	The Site coverage has been optimized considering the Prescribed Window, Open Space, Setback	
	of the RCHE and how the proposed site coverage is optimised to achieve a lower	and Views from the Building.	
	building height.		
17.	Section $3.2.2$ – Please indicate the proposed setback of 5m at the front entrance on the	Revised accordingly.	
	floor plan of LG/F in Figure 8 (i.e. G 02).		
18.	Section 3.2.7 – Please advise whether the accessible flat roofs has been taken into	Accessible flat roofs are not GFA accountable.	
	account in the calculation of gross floor area.		

Comments		Response	
19.	Section 3.2.9 - Please advise the proposed area of hobby farm on the roof floor and	Proposed hobby farm area: 45.28m ² . Refer to Figure 8 (G-08).	
	indicate the floor plan of R/F in Figure 8 (i.e. G 08).		
20.	Section 4.3 – The sites of similar section 12A planning applications provided are not	They are the closest comparisons we could find.	
	falling within "AGR" or "GB" zones. Please consider providing similar section 12A		
	planning applications involving "AGR" or "GB" zones with higher relevancy.		
21.	Section 4.5, Section 5.5, 3rd paragraph and Section $6.2.6$ – Please be advised that the	Although, LSPS approved schemes are mainly "Residential" in nature, it represents good	
	Land Sharing Pilot Scheme (LSPS) Application No. LSPS/003 and LSPS/004 have	examples of similar re-zoing of "AGR" Land.	
	obtained in principle endorsements by the Chief Executive in Council/the Steering		
	Committee on Land and Housing Supply chaired by the Financial Secretary under the		
	delegated authority from the Chief Executive in Council in November 2022 and		
	December 2023 respectively. However, the LSPS mainly intends to provide public and		
	private residential developments, and the corresponding statutory procedures of		
	rezoning for the proposed developments under these applications have not been		
	commenced.		
22.	Section 5.1 -Please advise if the applicant has obtained policy support from relevant	Normally, SWD would advise "no adverse comment" to the application instead of a Policy	
	policy bureau for the provision of RCHE at the Site.	Support.	
23.	Section 5.1, 2nd Paragraph, 2nd Sentence - This sentence seems to be incomplete,	Amended. Revised as per Planning Statement P.18 per attached.	
	please revise as appropriate.		

Comments		Response	
24.	Section 5.4 -Please beef up how the applicant would address the interface issues	The Visual effect would be migrated by introduction of Ventail Greeney on Southeast. The gradual	
	between the proposed RCHE and the village cluster within close proximity.	set back by Terraces on also help to migrate the Building Bulk effect.	
25.	Section 5.4, 3rd Paragraph - Please advise whether the concerned building height	The concerned building height difference refers to the difference between the building heights of	
	difference refers to the difference between the building heights of the proposed RCHEs	the proposed RCHEs under applications No. A/YL/263 & 302 and the village houses in the	
	under applications No. A/YL/263 & 302 and the village houses in the vicinity. If yes,	vicinity. There are typo errors in the 3 rd paragraph found and revised.	
	the concerned building height difference is 14.77m to 18.17m as shown on Figure 9a.		
	Please clarify the inconsistency.		
26.	Section 5.4 - Please advise (i) building height difference and distance between the	Height different: 22.55m	
	proposed RCHE under the current application and the village houses/village	14.55m away from nearest house	
	houses/low rise residential developments to the west, and (ii) any design consideration	Green Wall is provided to compensate the green affected by the proposed development.	
	to respect the local settings of mainly village houses/low rise residential developments		
	with lower building heights and vegetation.		
27.	Section 5.6.2 - Please advise if this section is implying that the building separation	As per BD practice notes, fulfillment of APP-152 (SBPG) is only required for Development	
	requirements under the Sustainable Building Design Guidelines (SBDG) are not	which require GFA concession as listed at in APP-151. We have no intention to apply for GPA	
	applicable to the current application. In accordance with SBDG, the building	concession for the Development. However, as a good gesture and to contribute to the Build	
	separation requirements is applicable to (i) sites that are 20,000m2 or above; or (b)	Environment, efforts are tried to fulfill App-152 as much as possible. To summarize, except	
	sites that are less than 20,000m2 and proposed with building or group of buildings	Building Setback, Building Separation and Site Coverage of Greeney could be complied with.	
	having a continuous projected façade length (Lp) of 60m or above. In addition, SBDG		

Comments	Response	
also provides the requirements of building setback and site coverage of greenery.		
Please review this section.		
28. Section 6.2.3 - Please advise (i) whether the proposed RCHE will be privately	(i) Maybe privately operated.	
operated and (ii) who/which organisation will be responsible for the construction and	(ii) The owner will be responsible for the construction and operator will be responsible for the	
future maintenance of the proposed RCHE.	future maintenance.	
29. Section Plan A A in Figure 8 (i.e. G 01) – Please advise and indicate the height of the	Roof top structure is 3m height refer to Figure 8 G-01.	
proposed roof top structures. According to Joint Practice Note (JPN) No. 5		
Appendix 1 – Visual Impact Assessment		
30. Please incorporate the discussions regarding (i) the visual compatibility of the	(i) All compatibility has been concluded in effect on public viewer and visual resources.	
proposed RCHE with the surrounding areas with village houses/low rise residential	(ii) Green Wall are proposed on the southeast facade of the development. Refer to Figure 5 in	
development and vegetation; and (ii) any mitigation measures and design	Figure 3 in VIA.	
considerations to alleviate the visual impact of the proposed RCHE, which should also		
be illustrated on photomontages as appropriate. The above should also be discussed in		
Section 3.3 of the Supporting Planning Statement.		
Appendix 2 – Traffic Impact Assessment		
31. The comments on the planned and committed developments incorporated in the Traffic	Noted and please note that comments on the planned and committed developments have been	
Impact Assessment have been provided separately.	incorporated, please refer to Section 4.3 of the revised TIA report for details.	
32. Section 2.2.1 – The current Traffic Impact Assessment has not taken into account (i)	Please note that the revised TIA report has taken into account (i) the number of beds within the	

Comments	Response	
the number of beds within the proposed isolated rooms and staff quarters and (ii) the	proposed isolated rooms and staff quarters and (ii) the estimated number of employees and	
estimated number of employees and visitors on daily basis. Please liaise with the TD	visitors on daily basis for assessment purpose please refer to Section 2.2 of the revised TIA report	
to confirm whether they should be included for assessment purpose.	for details.	
33. Please beef up the key findings and any proposed mitigation measures in Section 3.4	The peak traffic generated by the proposed development is small and would induce insignificant	
of the Supporting Planning Statement.	impact on the surrounding road network.	
	The proposed mitigation measures are as follow:	
	With consideration of existing road configuration, no proper footpath from the proposed	
	development to Tung Tsz Road, minor road improvement of 3.5m wide single track for two-way	
	traffic with widening at turning area together with a minimum 1.3m wide footpath is proposed.	
	Please refer to Section 2.3 of the revised TIA report for details.	
	To avoid overload the public transport by visitors coming/leaving the proposed development, it	
	is proposed to provide light bus by the Applicant for the visitors with 1 veh/bound/hr during	
	operation hour of 9am to 5pm so as to minimize traffic impact to the surrounding road network	
	especially Ting Kok Road while maintaining shuttle service to visitors. The proposed routing of	
	shuttle service (light bus) will be between the proposed development and Tai Po Market Station.	
	Please refer to Section 2.6 of the revised TIA report for details.	
Appendix 3 – Environmental Assessment		
34. Section 1.2 - The current Environmental Assessment has not taken into account (i)	t (i) (i) With reference to the latest engineering information, the total number of beds is 276 including	

Comments	Response	
the number of beds within the proposed isolated rooms and staff quarters and (ii) the	the beds within the proposed isolated rooms and staff quarters. The Environmental Assessment is	
estimated number of employees and visitors on daily basis. Please liaise with the	updated according to the latest figure.	
Environmental Protection Department to confirm whether they should be included for	(ii) The estimated number of employees can be referred to Table 4-3 of the Environmental	
assessment purpose.	Assessment Report. Visitors are included in the assessment and please refer to the updated Table	
	4-3 of the Environmental Assessment Report.	
35. Sewerage Impact Assessment, Section 4 – The current Sewerage Impact Assessment	(i) With reference to the latest engineering information, the total number of beds is 276 including	
has not taken into account (i) the number of beds within the proposed isolated rooms	the beds within the proposed isolated rooms and staff quarters. The Sewerage Impact Assessment	
and staff quarters and (ii) the estimated number of visitors on daily basis. Please liaise	is updated according to the latest figure.	
with the Environmental Protection Department and Drainage Services Department to	(ii) The estimated number of employees can be referred to Table 3 of the Sewerage Impact	
confirm whether they should be included for assessment purpose.	Assessment Report. Visitors are included in the assessment and relevant sections of the Sewerage	
	Impact Assessment Report are revised accordingly.	
36. Please beef up the key findings and any proposed mitigation measures in Section 3.5	Section 3.5 of the Environmental Assessment Report is updated accordingly.	
of the Supporting Planning Statement.		
Appendix 4 – Landscape Master Plan		
37. Section 6.2 – Please update the number beds of the proposed RCHE for consistency.	Revised.	
38. Further to the comment no. 3 above, please review whether any existing	Since no existing tree within site boundary, no conflict occure.	
trees/vegetation within the site boundary (if they are proposed to be		
retained/transplanted) will be in conflict with the proposed Landscape Master Plan.		

Comments	Response
39. Please beef up the key proposed features/design elements in Section 3.6 of the	Revised.
Supporting Planning Statement.	

3.1 Proposed RCHE Development

3.1.1 The proposed RCHE Development is of 10 storeys high, with lower 9 storeys (LG/F to 7/F) to be served as RCHE Dormitories. The Floor Level of 7/F is within 24m from Ground Floor, which comply with relevant Regulation. (*Figure 8 refers*)

A range of Dormitory sizes from Shared Rooms with individual privacy on lower floors, to individual Suites of various sizes on upper floors. The Suites on 7/F are equipped with open Flat Roofs for extra enjoyment or even individual hobby farming.

3.1.2 A range of Common Facilities like Café Lounge, Multi-function Rooms, Library, Gymnasium, etc. locate on LG/F, next to a generous Entrance Lobby (at level +3.50).

> Loading/ Unloading of Goods and Passengers are also provided adjacent to the Entrance Lobby. Plenty of Greenery, Garden, Outdoor Exercise and Sitting-out Spaces are also planned on various outdoor areas.

3.1.3 The Floor above the Dormitories (8/F) is designed for supportive functions like Administration Office, Meeting/ Interview Rooms, Kitchen, Laundry and Linen Stores, etc.

6 Staff Quarters are also provided for Staffs on 8/F so that overnight staffs could provide more timely services to the Elderly in case needed.

3.1.4 The Top of the Building on Roof Floor (at level +34.50) is designed as an Open Roof Garden for the Leisure of the Staffs and Visitors. It also serves to provide Roof Greeney according to SBDG.



3.1.5 The GFA allocation is tabulated as below:

		: 1,494.67 m ²	100000000
	Site Area		16,088.62 ft ²
	Class of Site		
•	Proposed Plot Ratio for		
Non-Dome	Non-Domestic		
Proposed	Site Coverage above	: 61.09% < 80%	
for Non-Do	omestic (Above 15m)		
Maximum	Gross Floor Area	8,323.83 m ²	89,597 ft ²
Proposed E	Building Height	34.50 mPD	
Absolute H	eight	31.0 m	
Proposed N	No. of Storey	10 STOREYS	
Proposed C	Gross Floor Area		
LG/F	ENTRANCE & CARPARK	606.13 m ²	
UG/F	RCHE	613.16 m ²	
1/F – 5/F	RCHE	916.89 m ² x 5	43 no. of beds x
		storeys	5 storeys
		=4584.45 m ²	(Including
			Isolation Room)
6/F	RCHE	886.14 m ²	18 no. of <mark>beds</mark>
			for suites
7/F	RCHE	759.44 m ²	11 no. of beds
			for suites
8/F	MANAGEMENT	764.44 m ²	12 no. of beds
	OFFICE		<mark>for staff quarter</mark>
R/F	SKY GARDEN	110.07 m ²	
TOTAL		8,323.83 m ²	<mark>256 no. of beds</mark>
Parking Spaces: (Loading/ Unloading)			
No. of LGV		1 Nos.	
No. of Minibus		1 Nos.	
No. of Private Car Parking		3 Nos.	
No. of Accessible Private Car		1 Nos.	
Parking			
No. of Motorcycle Parking		1 Nos.	
	,		

Please refer to *Figure 3* for the Proposed Development



- 3.2.7 ⑦ Spacious Suites are planned on Upper Floors to serve the Elderly with greater mobility who require considerable privacy at the same time. The setback on higher Floors create accessible Flat Roofs for the Suites with canopy and trellis to shield off direct sun light, for sitting out or hobby farming purpose. The setback also aid in alleviating the Building Bulk effect.
- 3.2.8 (8) A floor for General Administration Locates above the Dormitory Room on the Upper most floor.

In addition to general administration need, it provides 6 Staff Quarters, which may benefit the Elderly for after-hours emergency services and consideration is also given to the flexibility to employ "Epidemic Close Circuit Management" in case needed.

3.2.9 (9) -A roof garden consist of outdoor Leisure Spaces, Equipment and Individual Farming Areas for interest and hobby is provided on Roof Floor.



3.3 Visual Impact Assessment

A Report of the Visual Impact Assessment of the Development prepared by RLEE Architects Ltd is enclosed as per Appendix 1. It presents the Findings and Surveys conducted and summarized the Impact to the Visual Aspect created due to the increased in Plot Ratio and Height.

3.4 Traffic Impact Assessment

A Report of the Traffic Impact Assessment of the Development prepared by CTA Consultant Limited is enclosed as per Appendix 2. It presents the Findings and Surveys conducted and summarized that NO adverse Impact to the Traffic Aspect is created due to the increased in Plot Ratio.

3.5 Environmental Impact Assessment

A Report of the Environmental Impact Assessment of the Development prepared by Novox Limited is enclosed as per Appendix 3. It presents the Findings and Surveys conducted and summarized that NO adverse Impact to the Environmental Aspect is created due to the increased in Plot Ratio.

3.6 Landscape Master Planning

A Report of the Landscape Master Planning of the Development prepared by R LEE Architects Limited is enclosed as per Appendix 4. Vegetation at the front of the development along Access road, Green wall on southeast facade, various planter on flat roof on 1/F and 7/F, and roof garden are proposed. The Landscaping design could benefit the surroundings by improving the visual, Air Purification and Micro-Climate aspects.



5.1 The Aging Community Structure

Hong Kong continues to have the longest life expectancy in the world. According to a report published by the Government Census and Statistics Department in 2021, Hong Kong has a population of approximately 7 million, and the population over the age of 65 is approximately 1.45 million. The aging trend of the population continues, until 2046 (i.e. 25 years later) it will increase to 2.74 million people.

As of 2021, public and private residential care homes for the elderly in Hong Kong provide a total of about 70,000 beds. If it accounts for 5% of the population over 65 years old, according to estimates by the Census and Statistics Department, the number of RCHEs needed will increase to 137,000 by 2046. That means 2,680 new beds need to be added every year. Assuming a RCHE of average 300 beds, nine new RCHE will need to be built every year! However, according to the number of RCHEs completed in recent years, an average of 2 to 3 number are built each year. In the long run, demand will definitely exceed supply.

The government launched a land premium exemption policy in 2003 to encourage private construction of RCHE, but the results have been ineffective. As of 2019, 16 years later, only one RCHE, completed in Hu Tei, Tuen Mun. In 2024, the market response is not positive.

The construction of a RCHE is a time and money consuming process. Planning approval is being the first hurdle in the process. Therefore, the approval of this S12A application would aid to foster another successful RCHE Development.



5.4 Similarity to RCHE Developments approved in "V" zone

The Application Site, although zoned "AGR" and "GB", locates at the fringe of "AGR" zone and adheres closely to a "V" zone to the West. It possesses similar feature to a "V" zone.

There are two approved S16 cases located in South Yuen Long (no. A/YL/302 and A/YL/263) which situate closely to a "V" zone (*Figure 1 in Figure 9a refers*). The resulting building height difference are 18.17 m and 14.77 m respectively.

Referring to our Application case, as revealed from *Figure 2 in Figure 9a*, the resulting building height difference is 22.55 m, which is similar to the above mentioned cases.

Since there are precedent cases for successful S16 planning application from "V" zone to a "Social Welfare Facility" for RCHE Development. Similar approval could be favorably considered to this S12A Application.



5.6 Consideration of Green Building Design and Sustainable Building Design Guidelines (SBDG)

5.6.1 Green Building Design

A List of Green Building Design including G/F Greenery Open Spaces and Open Roof Garden are elaborated in Section 3.2.

5.6.2 Sustainable Building Design Guideline

The Site area of the Development is below 2,000m², of which SBDG (PNAP) APP-152 would not be applicable. However, every effort is made to comply with the Guideline as much as possible in order to contribute to improve the overall Built Environment. Those are summarized as Follows:

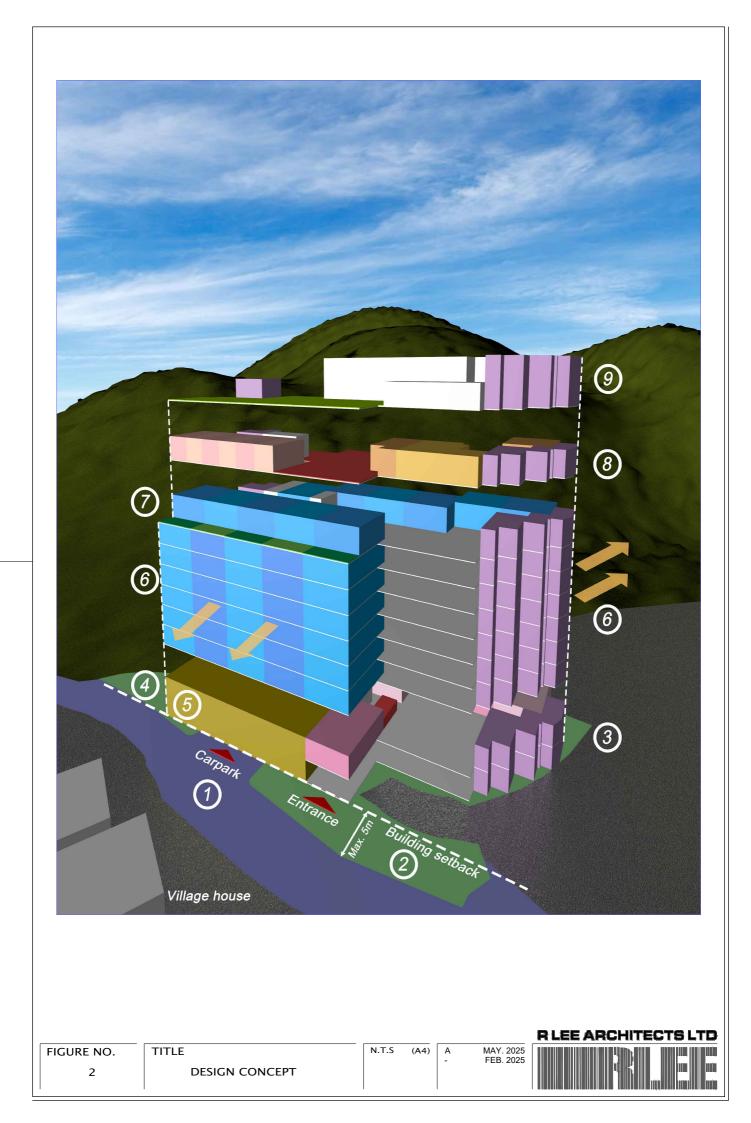
5.6.2.1 Building Setback

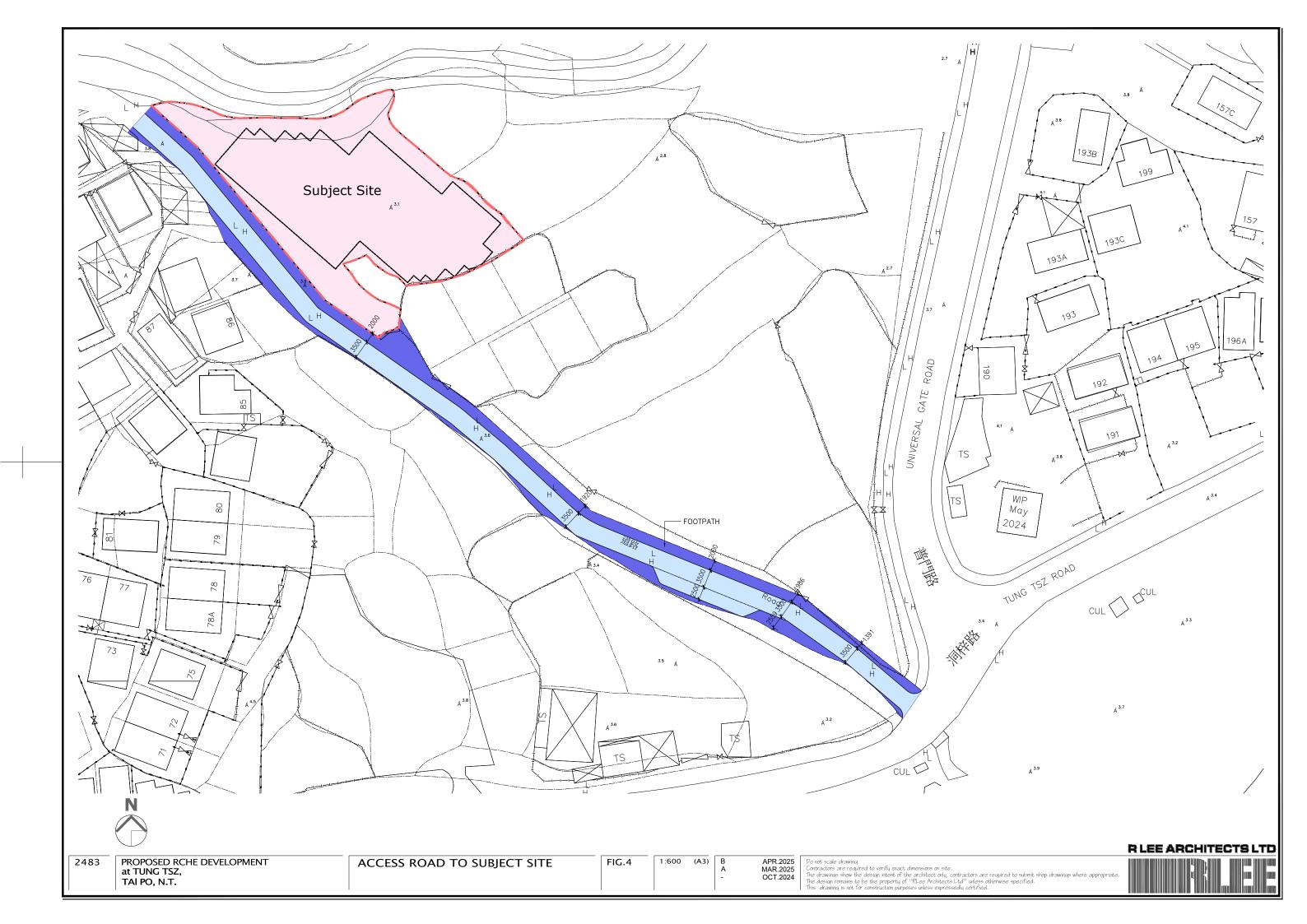
The projected facade length of the proposed building abutting the street (LP) is below 60m which is below the stipulation under the SBDG.

5.6.2.2 Site Coverage of Greenery

In order to improve the environmental quality of the urban space, particularly of the pedestrian level to mitigate the heat island effect, Greenery is proposed on various locations to satisfy that required under SBDG. The details are summarized in a LMP report as attached in Appendix 6.















Existing condition (Scheme A)



FIGURE NO. 5 APR.2025 FEB.2025 R LEE ARCHITECTS LT

