

**Proposed Rezoning From “AGR”&“GB” To “G/IC” for
a Proposed “Social Welfare Facilities” (Residential Care Homes for The Elderly) (RCHE)
Lot 232 RP, 232 S.A ss. 1 (Part), 232 S.A ss. 2-3, 232 S.A ss. 4 (Part), 232 S.A ss. 5-14, 232 S.A RP,
232 S.B ss. 1-27, 232 S.B RP, 232 S.C - S.E, 233 S.A (Part), 233 S.B - S.M, 233 RP,
237 S.A - S.R, 237 RP, 239 S.A - S.G, 239 RP in D.D.23, Tung Tsz, Tai Po, N.T.
S12A Application for Planning Application No. Y/NE-TK/20
Response-to-Comment – PlanD
(Updated 27 July 2026)**

Comments	Response
1. Comments of the District Planning Officer/Shia Tin, Tai Po and North, Planning Departmentas follows: I refer to the further information of subject application received on 22.5.2026. Please find the comments from district planning perspective below for your consideration. Supporting Planning Statement (SPS) 1. Please advise any preliminary support from the village representatives and the Tai Po Rural Committee have been obtained, and any liaison with the relevant parties has been conducted to avoid disputes in the future. 2. R-to-C Item 9 – Please incorporate the clarifications on the proposed building setback along northern boundary facing the “Green Belt” zone and any tree falling/pruning and clearance of vegetation within the Site for the proposed development in relevant sections. 3. Section 5.1, 2nd paragraph – The figures quoted in this section seems to be different from the information source provided (i.e. https://www.swd.gov.hk/en/pubsvc/elderly/elderly_info/elderly_ah_sps/elderlyah/rcse/rcse_2021-2022/). Please review. 4. Section 5.1, Local demand – According to 2021 Population Census (https://www.censtatd.gov.hk/en/scode600.html), dependency ratio (number of persons aged under 15 and aged 65 and over per 1,000 persons aged between 15-64) is 438.	We are actively liaising with the village representatives. Due to the large number of stakeholder involved, more time is still required to communicate with the relevant party. S.2.1.4, 3.6.1, 5.3.2 are add to incorporate the clarification. Revised to tally with the source. Refer to SPS P.22. Revised to tally with the source. Refer to SPS P.22.

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Comments	Response
Please review. 5. Section 5.1, Provision gap – According to the Social Welfare Department’s website (https://www.swd.gov.hk/en/pubsvc/district/taipoandno/districtpr/npp/), the population aged 65 or above is about 75,100 in 2025. Please review. 6. Section 6.2.6 – As the applications under Land Sharing Pilot Scheme are no longer discussed in the SPS, please consider to remove this paragraph. 7. Section 5.3.1 – While vertical greenery is proposed at the southeastern facade of the proposed development, please advise the details of its maintenance plan to secure its long-term provision. In addition, please also consider any better alternatives to vertical greenery as good design measures. 8. Section 5.4.2 – The subject “Agriculture” (“AGR”) zone (where the Site is located at) covers an area of about 27,552m², and another “AGR” zone to the northwest covers an area of about 61,122m². Please review. 9. R-to-C Item 27 – Please revise ‘Encouragement Scheme’ as ‘The Incentive Scheme to Encourage Provision of Residential Care Home for the Elderly Premises in New Private Developments’ in Section 6.2.4. 10. Figure G-01, Section A-A – Based on the section cut line as shown on the Block Plan, lift lobby should not be involved on the roof floor. Please review.	Revised to tally with the source. Refer to SPS P.22. Revised. Refer to SPS P.29. Maintenance plan added on LMP P.19. Steel rope support climber system has been proposed in the development. Breathe up added on LMP P.12. Revised. Please refer to SPS P.25. Figure 11-1 and Figure 11-2. Revised. Please refer to SPS P.28. Revised. Please refer to G-01.

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Comments	Response
11. Figure G-07 – Please review whether +31.00mPD as annotated at work stations should be +24.50mPD instead.	Revised. Please refer to G-07.
12. Figure G-08 – Please review whether +34.50mPD as annotated at lift lobby should be +27.50mPD instead. <i>Appendix 2 – Traffic Impact Assessment</i>	Revised. Please refer to G-08.
13. Relevant comments have been conveyed to the traffic consultant via emails dated 6.7.2026 and 27.7.2026. <i>Appendix 3 – Environmental Assessment</i>	Noted and processing.
14. R-to-C Item 39 – Please supplement the refuse collection arrangement and frequency in Section 5.4.1. <i>Appendix 4 – Landscape Mater Plan</i>	Proposed once a day. EA S5.4.1 revised.
15. While vertical greenery is proposed at the southeastern facade of the proposed development, please advise the details of its maintenance plan to secure its long-term provision. In addition, please also consider any better alternatives to vertical greenery as good design measures.	Maintenance plan added on LMP P.19. Steel rope support climber system has been proposed in the development. Breath up added on LMP P.12.

3.1.5 The GFA allocation is tabulated as below: (Cont'd)

Loading/ Unloading:	
No. of MGW	1 Nos.
No. of Minibus	1 Nos.
No. of Ambulance	1 Nos.

Please refer to **Figure 8** for the Proposed Development

- 3.1.6 The proposed RCHE is proposed to provide service at the care level of Care and Attention Home for the Elderly. A 24 hours Care Home Service would be provided during operation. 60 staff provide service per shift and there are 2 shift per day. Total 120 staff provide service per day. The working hour of staff are 6:45 am to 6:45 pm and 6:45 pm to 6:45 am. The visiting hour is proposed to be 10:00 am to 4:00 pm. The maximum no. of visitor per hour is 19 and total no. of visitors per day is 114. The RCHE, once proceed, would include one or more Operators. The RCHE is proposed to participant in the "Enhanced Bought Place Scheme" and "Residential Care Service Voucher Scheme". The RCHE would fully comply with design manual of Barrier Free Access.
- 3.1.7 The applicant would Construct the propose RCHE and assign to an operator to privately operate, maintain and manage the RCHE.

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 7.4 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. (<https://www.census2021.gov.hk>)

As of 2021, public and private residential care homes for the elderly in Hong Kong provide a total of about 74,900 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. (https://www.swd.gov.hk/en/pubsvc/elderly/elderly_info/elderly_ah_sps/elderlyah/rcse/rcse_2021-2022/)

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.

5.1 The Aging Community Structure (Cont'd)

Local demand

Tai Po had 316,470 residents in the 2021 Census, with 170,432 females and 146,038 males. The district's older population has grown steadily, and in 2021 people aged 65+ already made up a large share of the district, indicating a strong local need for elderly services. According to Population Profile of Tai Po District, there is 58,502 persons aged 65+. 18.5% of District Population. The elderly depending ratio = $18.5\% / 70.6\% = 26\%$, showing an ageing pressure.

Waiting-list pressure

The Social Welfare Department reported 17,069 applicants on the Central Waiting List for subsidised residential care services as at 31 October 2023, including 14,461 for care-and-attention places and 2,608 for nursing home places. The same update showed average waiting times of 22 months for subvented and contract care-and-attention homes, 3 months for private homes under the EBPS, and 11 months for nursing home places. This is a clear sign that demand for RCHE-type care remains substantial.

Provision gap

SWD's district statistics show that Tai Po had 1,665 subsidised residential care places as at 31 March 2026, across subvented, NGO-operated, contract and care-and-attention categories. A separate SWD district profile also shows Tai Po's older population at 75,100 in 2025, which suggests the district must serve a large elderly base with a finite number of subsidised places. This supports the argument that additional RCHE provision in Tai Po is warranted.

5.3 Special Design to respect the rural character

5.3.1 By situating in the rural setting with group of Village House by the side and a small mountain to the rear, the Elevation treatment is specially design with regard to the followings (*Figure 9-2 and 9-3 refers*):

- ① Similar beige wall tiles are used to echo the Village House around.
- ② Bands of similar reddish colour used in Village House which happen on every two floors to scale down the Building, and further match the scale of the surrounding Village Houses.
- ③ Set back on both side of the Building indicate setback, along the Access Road and on 4/F to the RHS trim down the Building bulk.
- ④ 78.6 m² Vertical Greenery and 51.0 m² of Steel Rope Greenery are installed facing the approach from "Tung Tsz Road" to soften the Building Bulk.
- ⑤ The Height of Building is trimmed down from previous application and is kept to 24m from G/F. The effect is demonstrated in *Figure 9-3* which keep the Building under to ridgeline of the mountain behind.
- ⑥ Greenery along site boundary.

In addition, Greenery along the site boundary is proposed to enhance the view and aesthetic of the surrounding.

5.4 Under Utilization of AGR Land

According to goggle map photo record, the site is vacant since 2011 or earlier. It shows natural dieback from 2021. In 2022, it was filled with gravel. The site is no longer suitable for farming by the changes of ground condition.

5.4.1 A Survey demonstrated by Aerial Photos taken on year 2003 and year 2022 is shown on attached **Figure 11-1** and **Figure 11-2** respectively.

5.4.2 In both years, and within 300m from the Application Site, there is roughly 88,674 sm of AGR Land in the AGR zones. The Aerial Photos demonstrated that only around 0.7% of AGR Land is utilized as "Farmland" in year 2003 and only 2% is utilized as "Farmland" in year 2022. The percentage of under utilization is serve. They are mostly left vacant or serves as unpermitted uses. The rate of re-habitation is extremely low.

5.4.3 The environmental problem caused by idle or derelict agricultural lands posed a major concern in LEGCO, as shortlist as "Replies to Legislative Council Questions" in **Figure 12-1**. In para 3, it is noted that "*(b) as such agricultural lands are usually covered with weeds, breeding mosquitoes and insects, or are illegally used as car parks and for storing containers or miscellaneous objects, and so on, thus causing nuisances to the residents nearby.....*".

5.4.4 On 30/11/2011 a Press Releases from LEGCO revealed the member's concern on the rate of conversion of under utilized AGR Land. (**Figure 12-2 refer**).

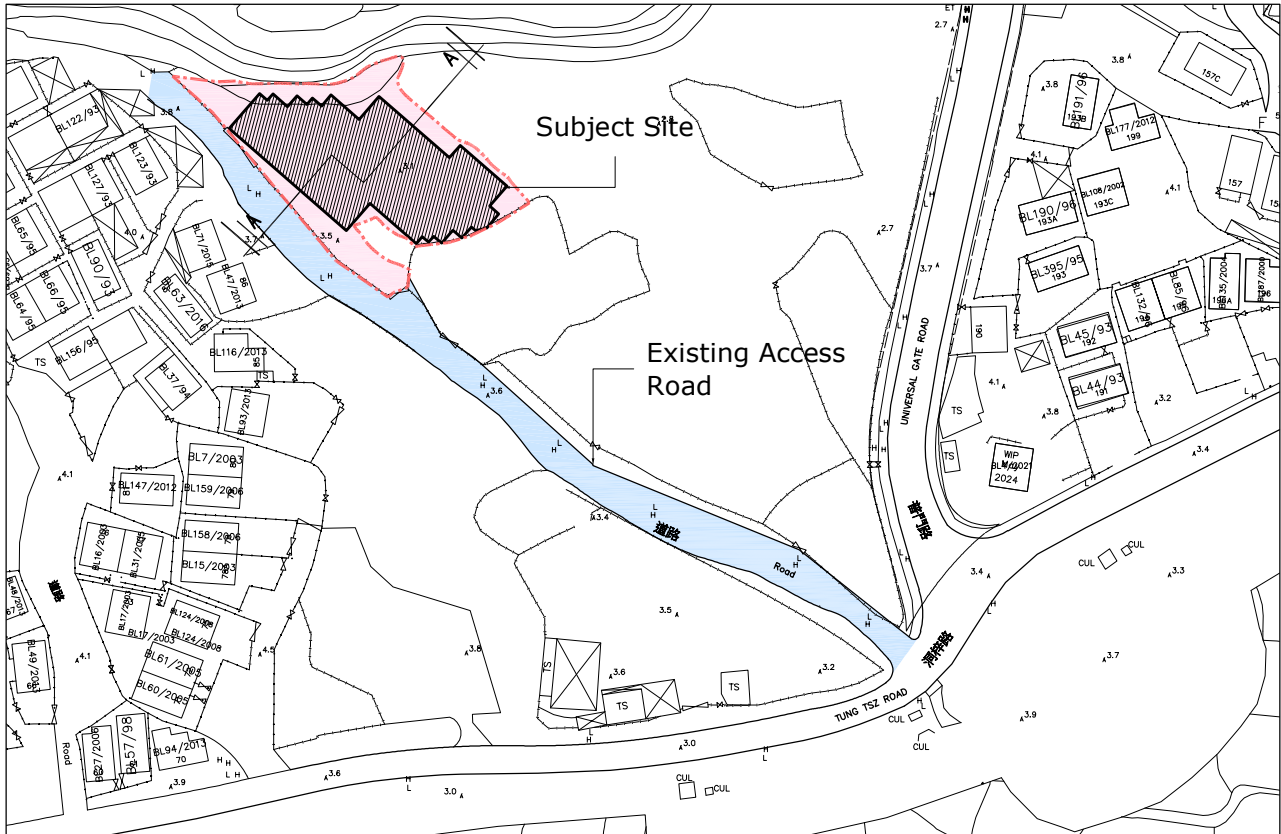
5.4.5 The facts revealed the serious problem caused by idle AGR Lands. The society should allow certain Town Planning issues to truly revitalize the AGR Lands. Change in land use may benefit the society both in upkeeping of healthy environment and wisely utilize the valuable Land Resources.

- 6.1 This supporting Planning Statement is submitted under Section 12A of the TPO to seek approval for the rezoning of the subject site from "AGR" to "G/IC", for the proposed RCHE.
- 6.2 The proposed RCHE with a focus on Public Interest is justified based on the followings:
- 6.2.1 In view of the Aging Population growth, there is a strong demand of RCHEs in the Territory in the long run.
- 6.2.2 In consideration of the scarce land resources, the replacement of the existing underutilized, abandoned Agricultural Land by a RCHE of higher Plot Ratio is justified.
- 6.2.3 The Applicant has located a number of potential experienced RCHEs Operators and would assign one of them as the Operators in future. After the construction by applicant, the operator would operate, maintain and manage the RCHE.
- 6.2.4 It is a sizable standalone RCHEs development that comply with The Incentive Scheme to Encourage Provision of Residential Care Home for the Elderly Premises in New Private Development of the Social Welfare Development. Since the launching of the Scheme in 2003, there is only one successful RCHE built in 2019. The approval on this S12A application would aid to speed up more RCHE developments.
- 6.2.5 By situating at the fringe of "AGR" zone and closely adjoin a "V" zone. It exhibits similar Height and Bulk difference comparing to a few previously approved S16 Schemes. The site is also surrounded by abundant Greenery and the increase in Building Bulk is adequately shield off.

6.2.6 The site is under single ownership, it could be readily re-developed to aid to solve the RCHes demand in short term.

6.3 In addition to the planning and design merits, it is also demonstrated by technical assessments on the Environmental Impact, Traffic and Landscape aspects that the Proposed Development will NOT generate insurmountable impacts to the Application Site and its surroundings.

6.4 In the light of the planning merits and justifications put forward in this Supporting Planning Statement, we sincerely seek for the favourable consideration from the TPB to give support to this Application.



BLOCK PLAN

SCALE - 1:1500

DEVELOPMENT SCHEDULE:

Site Area : 1476.48 m² (15892.83 ft²)
Class of Site : A
Proposed Plot Ratio For Non-Domestic : 4.11 < 7.4
Proposed Site Coverage above For Non-Domestic : 63.19% < 92%
(Above 15m)

Proposed Building Height : 27.50 mPD
Absolute Height : 24.0 m
Proposed No. Of Storey : 8 STOREYS

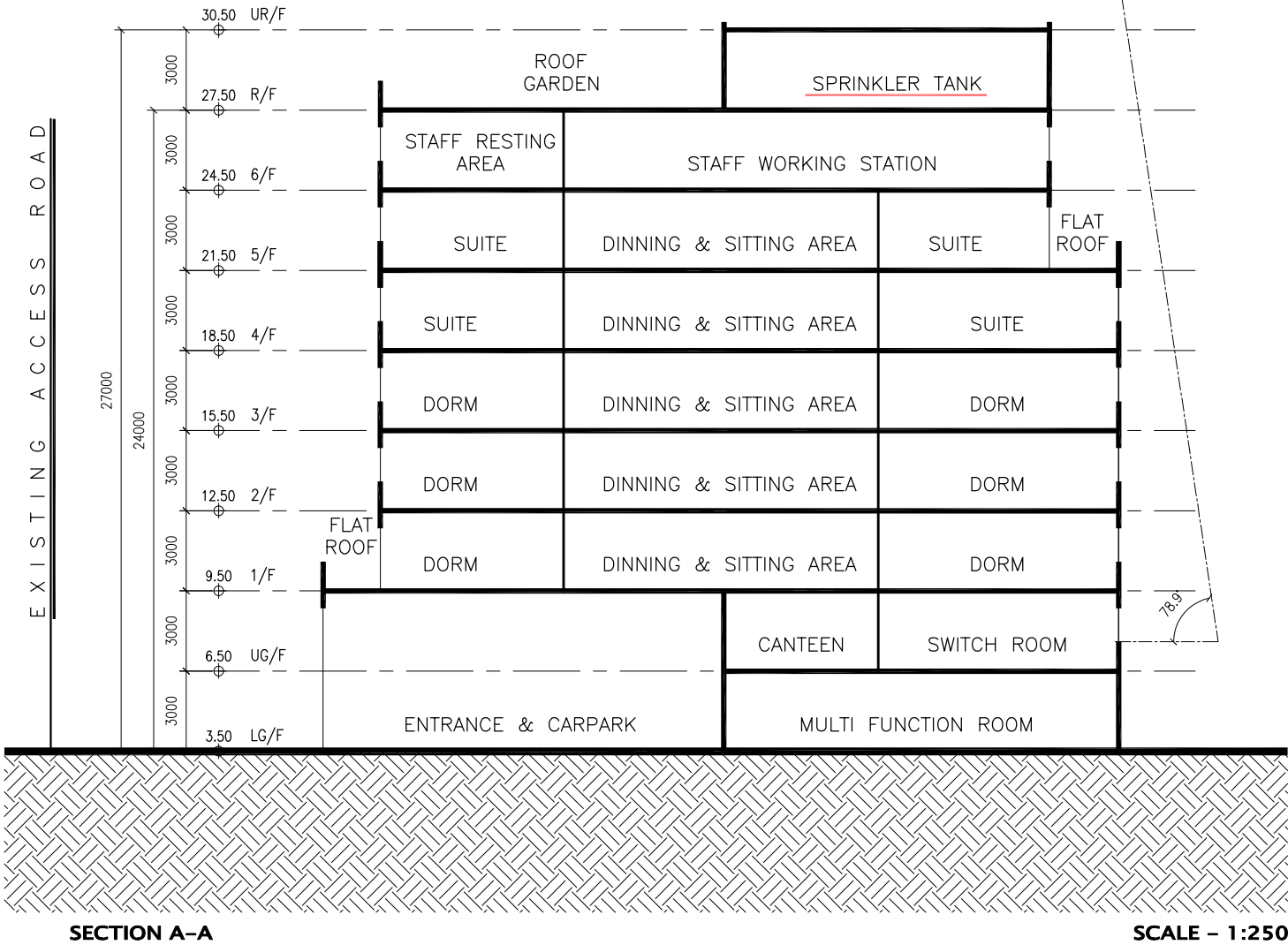
Proposed Gross Floor Area
LG/F (ENTRANCE & CARPARK) : 592.11m²
UG/F (RCHE) : 514.97 m²
1/F-3/F (RCHE) : 852.8m² x 3 storeys
= 2558.40 m²
4/F (RCHE) : 822.05 m²
5/F (RCHE) : 742.23 m²
6/F (MANAGEMENT OFFICE) : 742.23 m²
R/F (SKY GARDEN) : 100.50 m²

TOTAL : **6072.49 m² (65364.28 ft²)**

Parking Spaces :

No. of MGW (3.5m x 9m x 3.6m H.) : 1 Nos.
No. of Minibus (3m x 8m x 3.6m H.) : 1 Nos.
No. of Private Car Parking (2.5m x 5m x 2.4m H.) : 3 Nos.
No. of Accessible Private Car Parking (3.5m x 5m x 2.4m H.) : 1 Nos.
No. of Motorcycle Parking (1m x 2.4m x 2.4m H.) : 1 Nos.
No. of Ambulance (3m x 9m x 3.8m H.) : 1 Nos.

BOUNDARY LINE



SECTION A-A

SCALE - 1:250

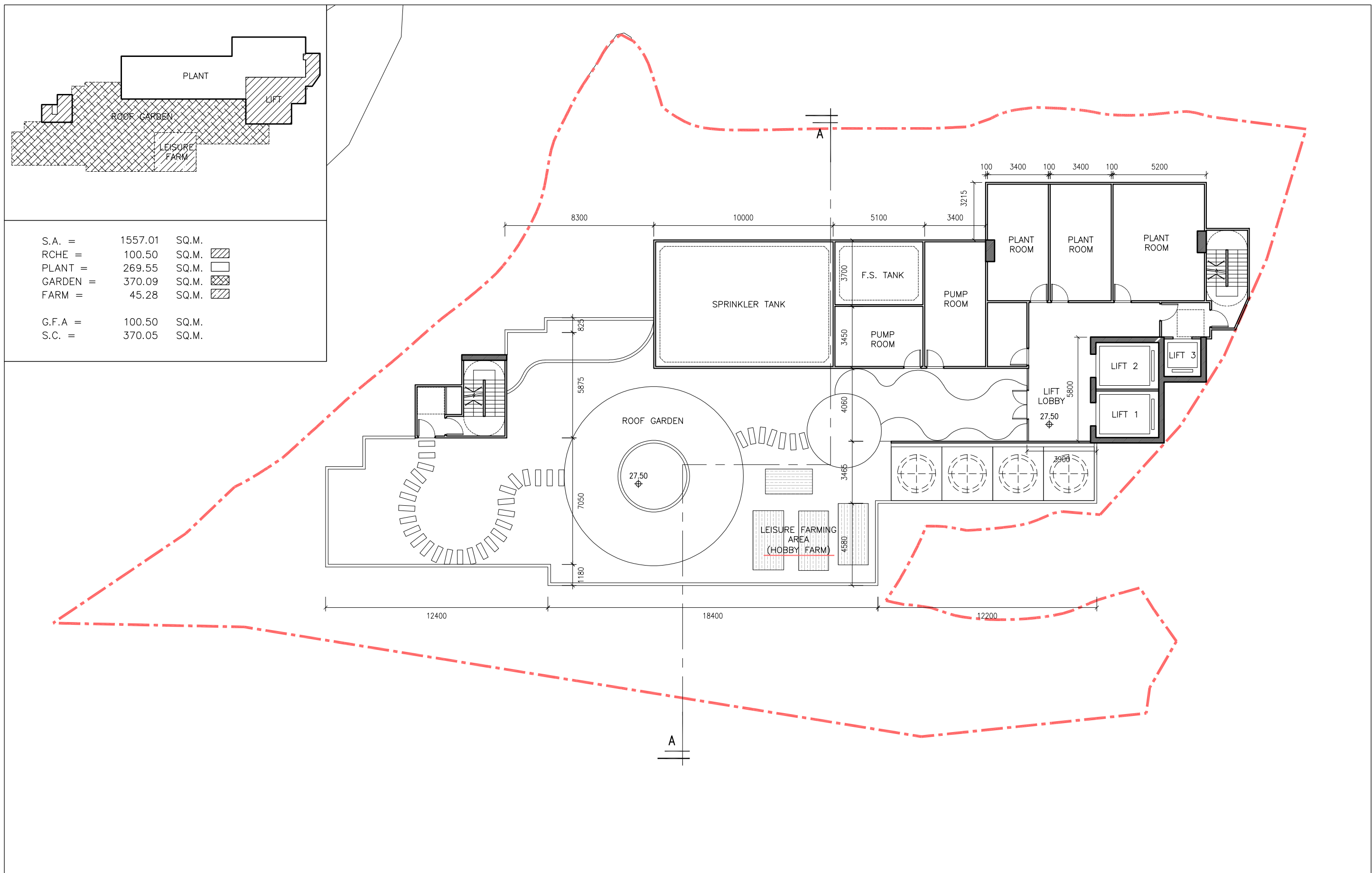
No. of beds						
Floor	No. of storey	Dorm		Isolation room		Staff
		Each floor	Sub-total	Each floor	Sub-total	
1/F-3/F	3	41	123	2	6	0
4/F	1	18	18	0	0	0
5/F	1	11	11	0	0	0
6/F	1	0	0	0	0	12
Total		152		6		12





S.A. =	1494.67	SQ.M.
ADMIN.OFFICE =	742.23	SQ.M.
PLANT =	1.41	SQ.M.
G.F.A =	742.23	SQ.M.
S.C. =	743.64	SQ.M.





S.A. =	1557.01	SQ.M.
RCHE =	100.50	SQ.M. 
PLANT =	269.55	SQ.M. 
GARDEN =	370.09	SQ.M. 
FARM =	45.28	SQ.M. 
G.F.A =	100.50	SQ.M.
S.C. =	370.05	SQ.M.



BOUNDARY LINE

2483

PROPOSED RCHE DEVELOPMENT
at TUNG TSZ,
TAI PO, N.T.

ROOF PLAN
ROOF GARDEN

G-08

1:200 (A3)
1:300 (A4)

G
F
E
D

JUL. 2026
MAY. 2026
OCT. 2025
AUG. 2025

Do not scale drawing.
Contractors are required to verify exact dimensions on site.
The drawings show the design intent of the architect only, contractors are required to submit shop drawings where appropriate.
The design remains to be the property of "R Lee Architects Ltd" unless otherwise specified.
This drawing is not for construction purposes unless expressly certified.

R LEE ARCHITECTS LTD





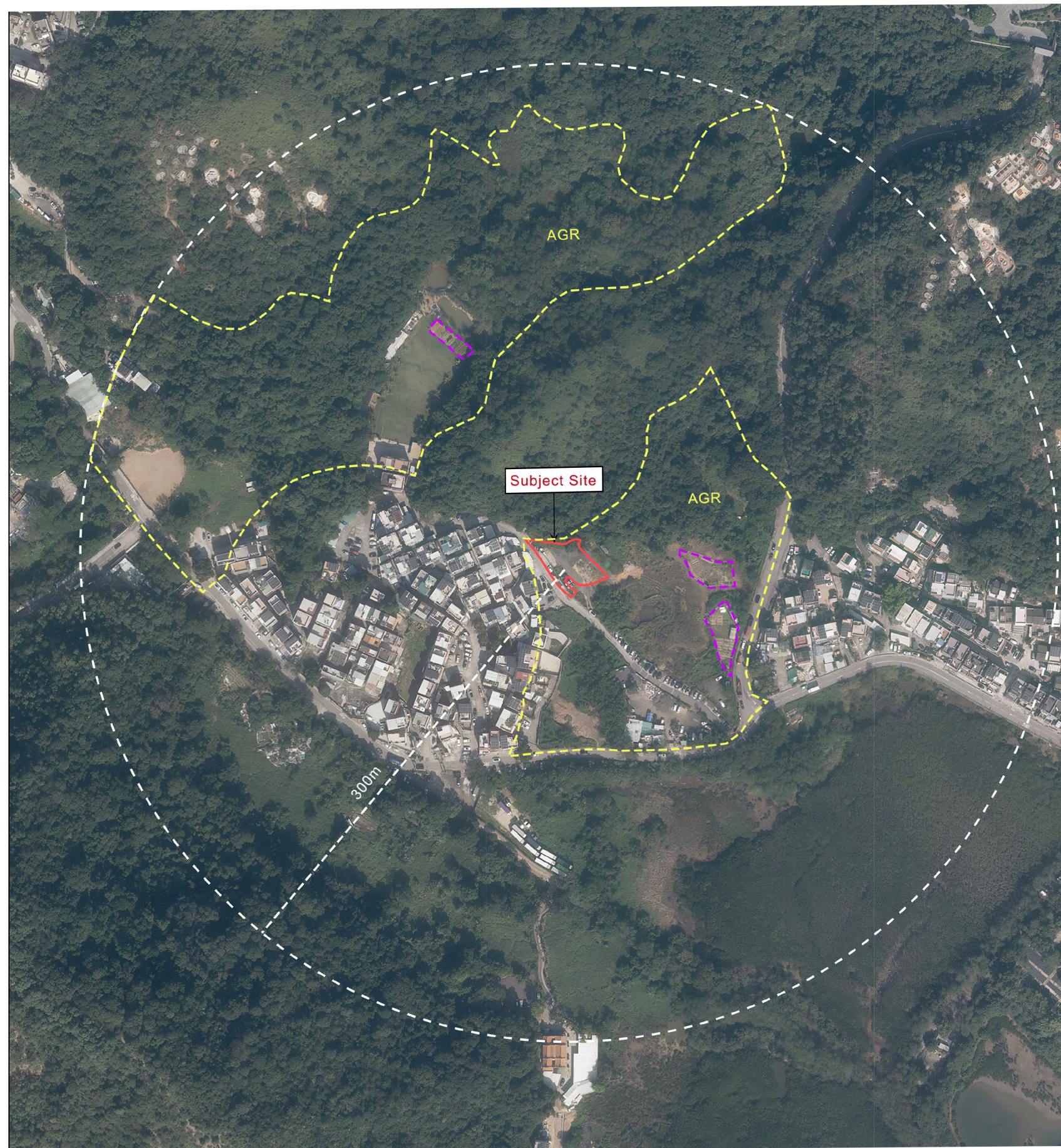
AGR Zone
within 300m
= 88,674 sm

Farmland
within 300m
= 620.72 sm

% of utilized Farmland
= 0.7%

Farmland utilities
in Year 2003





AGR Zone
within 300m
= 88,674 sm

Farming Area
within 300m
= 1,733.48 sm

% of utilized Farmland
= 2%

Farmland utilities
In Year 2022



⑫-Urban Farming

- 8.15 The Farming area is located in the middle of the Roof Garden. The 300m soil layer for farming would be sunken to ensure the user remains accessed at the same level as other sections of the Roof Garden. Four deeper planters will also be provided for the diversity of vegetation planting experiences in urban farming. Both Farming and its products can consequence a better communication and social relationship for the resident to support their mental and psycho-health during accommodation.

⑬-Vertical Greenery and Steel Rope/ Climber

- 8.16 6.55m (W) x 12.00m (H) and 3.40m (W) x 15.00m (H) Vertical Greenery and Steel Rope support/ Climber system located on the southeast facade of the proposed development to mitigate the observation disturb to the viewer from the southeast side.

Climbing plants are rooted in roof garden and supported by a network of stainless steel cable or rods fixed to the facade.

Advantage

No complex hydroponic or modular substrate systems; plants draw water and nutrients from soil, simplifying irrigation and fertilisation.

Lower capital and operational costs compared to modular living walls; longer service life with minimal maintenance.

Reduced structural loading, making it suitable for high-rise or wind-exposed elevations.

Safety Requirement

- 9.13 All outdoor facilities will be designed, constructed, and operated in full compliance with relevant safety standards and guidelines.

Maintenance Plan

9.14 Long-Term Maintenance Plan for Vertical Greenery

A comprehensive maintenance regime has been developed to ensure the ongoing health, safety, and aesthetic quality of the vertical greenery system. The plan is structured around routine inspections, scheduled servicing, performance monitoring, and clear accountability.

9.14.1 Roles, Responsibilities, and Contractual Arrangements

A dedicated horticultural contractor will be appointed through the property management framework, with scope and key performance indicators (KPIs) clearly defined in the contract.

Maintenance access, including building maintenance units (BMU), safety anchor points, and/or mobile elevated work platforms, has been incorporated into the design to facilitate safe and efficient access for all servicing tasks.

A maintenance budget has been allocated at the design stage to cover routine servicing, plant replacement, and periodic system upgrades.

9.14.2 Maintenance Frequency and Scope of Works

The maintenance programme follows a tiered approach: monthly routine servicing, quarterly detailed inspections, annual comprehensive reviews, and biennial to triennial major interventions.

Monthly Servicing

Pruning of overgrown or dead foliage to maintain coverage density and visual quality.

Inspection for pests and diseases, with targeted treatment or preventive spraying as required.

Testing and calibration of the automated irrigation system, including drip emitters, supply lines, filters, and controllers.

Monitoring of substrate moisture levels and adjustment of irrigation scheduling based on seasonal conditions.

Clearing of drainage channels and collection gutters to prevent blockages and water overflow.

Quarterly Inspections

Structural inspection of support frameworks, cables, trellises, and anchorage points for signs of corrosion, loosening, or deformation.

Assessment of plant health and coverage; replanting of areas with significant dieback and optimisation of species distribution based on microclimatic performance.

Wind damage assessment, particularly for upper levels and wind-exposed elevations.

Annual Comprehensive Review

Full system testing, including water pressure tests, electrical safety checks on control panels, and replacement of worn filtration components.

Major repairs or replacement of modular panels, substrate renewal in degraded zones, and large-scale replanting where necessary.

Submission of an Annual Greenery Maintenance Report, including photographic records, plant survival rates, irrigation water consumption data, fault logs, and remedial actions taken.

Every 2–3 Years

Comprehensive plant renewal or species optimisation based on longevity and performance data.

Corrosion protection and structural refurbishment of support elements (e.g., stainless steel cable inspection, protective coating repairs).

9.14.3 Plant Selection and Sustainability Strategy

Slow-growing, drought-tolerant, and wind-resistant species have been prioritised to minimise pruning frequency, water demand, and replacement rates.

Preference has been given to species native to or well-acclimatised with Hong Kong's subtropical climate to reduce pest susceptibility and improve resilience.

Zoning of plant species has been adopted: shade- and moisture-tolerant species at lower levels; sun- and wind-tolerant species at exposed upper zones, particularly on the southeastern facade.

9.14.4 Monitoring and Performance Indicators (KPIs)

To ensure accountability and long-term viability, the following quantifiable KPIs have been established:

Minimum plant coverage: $\geq 80\%$ outside of seasonal transition periods.

Maximum allowable plant mortality: $\leq 10\%$ at any quarterly inspection.

Irrigation fault response time: Rectification within 48 hours of fault detection.

Reporting: Annual maintenance report submitted within 30 days of year-end, in a format acceptable to the Authority.

5.4 WASTE MANAGEMENT IMPLICATIONS OF THE OPERATIONAL PHASE

The project site will be converted into a residential care home for elderly. Wastes generated during operation phase includes:

- General refuse; and
- Clinical waste.

5.4.1 General Refuse

General refuse during the operation phase mainly comes from daily living of residents in the care home, e.g., food waste, packaging of goods, used plastic and glass bottles, bedding and blankets, etc., which are similar to those from general households. Considering the number of residents is low, the quantity of general waste should not be significant.

Solid waste should be properly kept in covered containers/storage areas to avoid attracting of vermin or pests. Recycling containers are recommended to be provided at suitable locations to encourage recycling in the care home.

General refuse are proposed to be disposed once a day.

5.4.2 Clinical Waste

Residential care home for elderly is considered as a small clinical waste producer. It is likely that some types of clinical wastes, particularly needles and sharps, would be generated from its operation. As such, the Operator of the care home should complete the “*Clinical Waste Producer Premises Code Request Form*” and manage the clinical waste in accordance with the *Code of Practice for the Management of Clinical Waste – Small Clinical Waste Producers*.

Clinical waste should be segregated from other wastes. Used needles and sharps are classified as Group 1 clinical waste and should be stored safely in sharps box, before transferring to a disposal site. Colour of the sharps box should be either in yellow or a combination of yellow and white and sealed with proprietary closure.

The care home operator shall engage the service of licensed collectors to collect and transport clinical waste to the CWTC for proper disposal. Alternatively, the clinical waste may also be delivered by a health professional under the clinical waste producer, if there is any, and subject to compliance of additional requirements as stipulated in the *Code of Practice for the Management of Clinical Waste – Small Clinical Waste Producers*.

The care home operator must also keep all the records of the clinical waste consigned to a licensed collector or delivered to a collection point or licensed disposal facility. To achieve it, it is suggested to retain the Waste Producer Copy of the Clinical Waste Trip Tickets of each delivery.