

**llewelyn  
davies**

ARCHITECTS PLANNERS DESIGNERS  
Llewelyn-Davies Hong Kong Ltd

30 April 2026

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

***By Hand and Email***

Dear Sir

**Proposed Residential Development at Area 106B, Tung Chung, TCTL No. 55  
Section 16 Planning Application for Proposed Minor Relaxation of Maximum Building  
Height Restriction for Permitted Flat Use in "Residential (Group B) 3" Zone  
(Application No. A/I-TCE/7)**

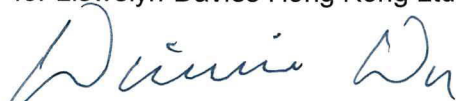
Reference is made to the captioned application submitted to the Town Planning Board (the Board) on 9 January 2026 and the subsequent submissions of Further Information (FI) made in January to April 2026.

In accordance with the TPB Guidelines PG-No. 32B, the Applicant herewith submits 5 copies of Consolidated Planning Statement to consolidate and supersede all previous submissions of Planning Statement and FIs to facilitate the Board's easy reference and consideration of the captioned application. Responses to departmental comments under previous FI submissions have been consolidated in **Appendix A** for reference.

Please note that this Consolidated Planning Statement only serves to consolidate all previously submitted materials and does not contain any new information. Accordingly, it should be exempted from the publication and recounting requirements. The Board is cordially invited to consider the captioned application at the meeting on 8 May 2026 as scheduled.

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

Yours faithfully  
for Llewelyn-Davies Hong Kong Ltd



Winnie Wu  
Planning Director

WW/AK/el  
Encl

Proposed Residential Development at Area 106B, Tung Chung, TCTL No. 55  
Section 16 Planning Application for Proposed Minor Relaxation of  
Maximum Building Height Restriction for Permitted Flat Use in  
“Residential (Group B) 3” Zone

Consolidated  
Planning Statement

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April 2026

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## **EXECUTIVE SUMMARY**

The subject planning application is submitted to the Town Planning Board (the Board) in support of the proposed minor relaxation of maximum building height (BH) restriction for permitted flat use in "Residential (Group B) 3" ("R(B)3") zone on the Approved Tung Chung Extension Area Outline Zoning Plan (OZP) No. S/I-TCE/2 under Section 16 (S16) of the Town Planning Ordinance (the Ordinance) (CAP. 131).

The Application Site is currently zoned "R(B)3" with a BH restriction of 70mPD imposed thereon. A set of General Building Plan (GBP) for residential development with a max. BH of 70mPD and 1 storey of basement carpark was approved in September 2025 (hereafter referred to as the Approved GBP Scheme).

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.

In response to the above mentioned policy initiative, the current planning application proposes a minor relaxation of BH restriction from 70mPD to 76.5mPD (+6.5m & +9.29%) to facilitate incorporation of the aboveground carparks design into the permitted residential development on the Application Site. Opportunities are also taken to include some design enhancement measures in the development. Basically, the Proposed Scheme is largely the same as the Approved GBP Scheme in terms of the general layout, building disposition and floor-to-floor height arrangement.

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 is for the incorporation of the aboveground carparks only with no major change in the floor-to-floor heights as in the Approved GBP Scheme;

- the proposed magnitude of increase in building height is minor and comparable to other similar approved planning applications for minor relaxation of building height restriction;
- the Proposed Scheme, with a minor increase in building height, is still in line with the urban design concept of the Tung Chung Extension Area, with stepped building height profile and air ventilation / view corridor preserved;
- the Proposed Scheme has included additional design measures as compared with the Approved GBP Scheme;
- the Proposed Scheme has no significant change in visual and air ventilation aspects; and
- no other technical impacts are anticipated, as the Proposed Scheme conforms to the planning intention, land uses and maximum plot ratio restrictions of the OZP, and all other development parameters remain the same as per the Approved GBP Scheme.

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《城市規劃條例》第 16 條 (第 131 章)，向城市規劃委員會 (下稱「城規會」) 遞交規劃申請，在東涌擴展區分區計劃大綱圖編號 S/I-TCE/2 一幅劃作「住宅(乙類)3」的地帶，擬議略為放寬最高建築物高度限制，作已核准的住宅發展(下稱擬議發展)。

申請地盤目前被劃作「住宅(乙類)3」地帶，其最高建築物高度為不多於主水平基準以上 70 米。申請地盤亦於 2025 年 9 月獲批准一套住宅發展的建築圖則 (以下簡稱「已核准方案」)。已核准方案的最高建築物高度為不多於主水平基準以上 70 米，並設有一層地下停車場。

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

基於上述政策，申請人現提交規劃申請，擬議將建築物高度限制由主水平基準以上 70 米放寬至主水平基準以上 76.5 米(增加 6.5 米及 9.29%)，以在申請地盤將地面停車場納入經常准許的住宅發展項目中。此外，申請人亦把握機會在擬議發展加入一些設計增益及改善措施。基本上，擬議發展在整體佈局、建築物設計及樓層高度，均與已核准方案大致相同。

以下為支持是次規劃申請的發展理據及增益：

- 擬議發展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；
- 擬議略為放寬最高建築物高度限制僅用於容納地面停車場，擬議發展並沒有大幅度改變任何已核准方案的樓層高度；
- 擬議建築物高度的增加幅度較小，並與其他已核准的類似規劃申請(略為放寬最高建築物高度限制)相當；

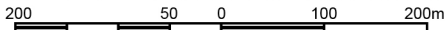
- 擬議發展在略為增加最高建築物高度後，仍然符合東涌擴展區的城市設計概念(即仍然保留東涌擴展區的階梯式建築物高度及通風廊/觀景廊)；
- 與已核准方案相比，擬議發展包含額外的設計增益；
- 擬議發展在視覺及通風方面沒有重大變化；及
- 擬議發展符合分區計劃大綱圖的規劃意向、土地用途及最高地積比率限制，所有其他發展參數均與已核准方案保持一致，因此擬議發展預計不會產生其他技術層面的影響。

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 maximum building height (BH) restriction for permitted flat use in "Residential (Group B) 3" ("R(B)3") zone on the Approved Tung Chung Extension Area Outline Zoning Plan (OZP) No. S/I-TCE/2 under Section 16 (S16) of the Town Planning Ordinance (the Ordinance) (CAP. 131) (**Figure 1.1** refers).
- 1.1.2 The Application Site is currently zoned "R(B)3" with a BH restriction of 70mPD imposed thereon. A set of General Building Plan (GBP) for residential development, with all development parameters conform to the OZP restrictions (i.e. a maximum BH of 70mPD) and 1 storey of basement carpark was approved in September 2025 (hereafter referred to as the Approved GBP Scheme).
- 1.1.3 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.
- 1.1.4 In response to the above mentioned policy initiative, the current planning application proposes a minor relaxation of BH restriction from 70mPD to 76.5mPD (+6.5m & +9.29%) to facilitate the incorporation of the aboveground carparks design into the permitted residential development on the subject "R(B)3" site. Opportunities are also taken to include some design enhancement measures in the development. Basically, the Proposed Scheme is largely the same as the Approved GBP Scheme in terms of the general layout, building disposition and floor-to-floor height arrangement.



Application Site 

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Title  
Extract of the Approved Tung Chung Extension Area Outline Zoning Plan No. S/I-TCE/2

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Scale	N/A		Figure 1.1

## **1.2 Report Structure**

1.2.1 This planning statement includes the following sections:

- Section 2: describes and analyses the Application Site, its site, surrounding, 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 located at the waterfront area of the Tung Chung Extension Area and has a total site area of about 10,648m<sup>2</sup>. The site is about 650m (about 7-minute walk) to the northwest of the planned Tung Chung East Station. It is also accessible via the existing Wui Tung Street (planned Road L3 of the Tung Chung Extension Area).

### 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 planning application is required for minor relaxation of BH restriction for accommodating 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. For those application sites situated on major breezeways, a simple review of the air ventilation impacts might be required in support of the relevant planning applications. The above measures have taken effect starting from November 2025.

#### Statutory Planning Context and Urban Design Concept for Tung Chung Extension Area

2.2.3 The Application Site falls within an area zoned "R(B)3" on the Approved Tung Chung Extension Area OZP No. S/I-TCE/2. According to the Notes of the subject OZP (**see Attachment 1**), the subject "R(B)3" zone is intended primarily for medium-density residential developments, subject to a maximum plot ratio (PR) of 3.5 and maximum building height (BH) of 70mPD.

- 2.2.4 According to the Explanatory Statement of the subject OZP, a stepped BH profile is adopted by which BHs are gradually reduced from the mountain backdrop in the south to the waterfront area in the north. The Application Site is situated at the waterfront area in the northwest of the Tung Chung Extension Area, the BH of the area gradually stepped down from the various high-rise "Residential (Group A)" zones to the southeast of the Application Site (i.e. 95-140mPD) to the various "R(B)" zones at the waterfront (i.e. 70mPD). Such stepped BH profile creates a distinctive outline that respects the current setting of the mountain and the sea.
- 2.2.5 Besides, according to the Urban Design Concept Plan for the subject Tung Chung Extension Area (**see Figure 2.1**), various major breezeways / view corridors have been strategically placed in order to (i) create a comprehensive breezeway system to promote better air ventilation and urban climate and (ii) provide views to the mountain backdrop and the sea from various nodes and open spaces within the area. It is noteworthy that two breezeways / view corridors have been planned for the Application Site. These two breezeways / view corridors running alongside the eastern and western edges of the site are designated as the non-building areas (NBAs) under the Tung Chung Extension Area Outline Development Plan (ODP). The same designation has been reflected in the land Lease for the subject site, with the concerned areas being designated as "Pink Hatched Blue" and Pink Hatched Blue Stippled Black" areas under Lease<sup>1</sup> (**see Figure 2.2**).

#### Planning Applications Approved for Minor Relaxation of Building Height Restriction

- 2.2.6 There are a number of approved planning applications for minor relaxation of BH restriction for the residential sites within the same Tung Chung Extension Area (i.e. A/I-TCE/3, A/I-TCE/4 and A/I-TCE/5). The magnitude of increase in BH of these approved planning applications ranges from about 3.2% to 18.2%. There is also an approved planning application for a G/IC site (i.e. A/I-TCE/6) with a magnitude of increase in BH of about 50%. From these, the proposed magnitude of increase in BH for the subject "R(B)3" site (about 9.29%) is considered minor and comparable with other similar approved cases in the vicinity. The details of the list of the above-mentioned planning applications are stipulated in **Table 2.1** below.

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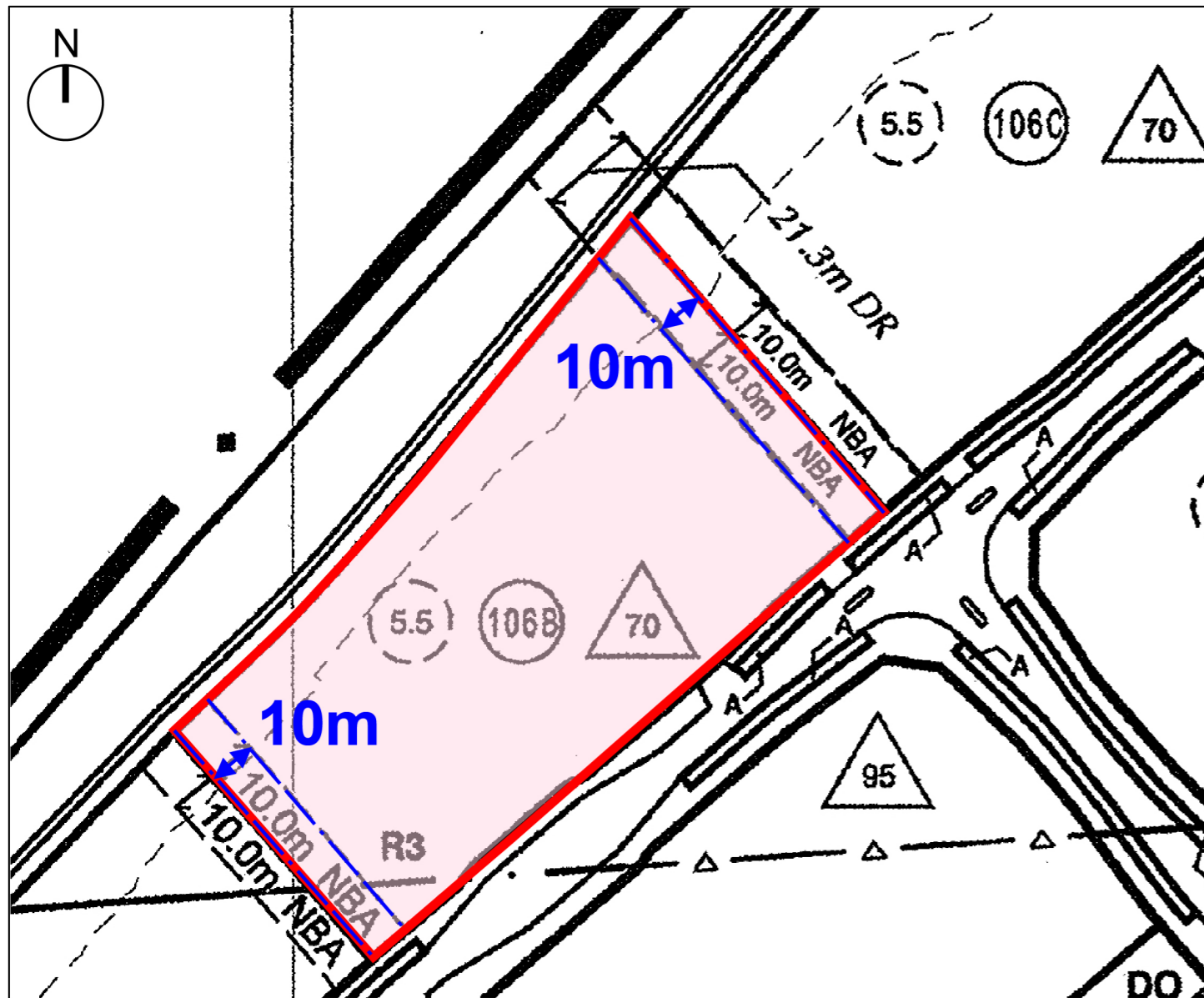
<sup>1</sup> Both "Pink Hatched Blue" and "Pink Hatched Blue Stippled Black" areas refer to a 10m-wide strip of land within the subject lot, being stipulated with "no building, structure, support for any building or structure, projection, boundary walls, fences, landscape works or tree works are allowed at and above 3mPD" under Lease. Additionally, the "Pink Hatched Blue Stippled Black" and "Pink Stippled Black" areas are also stipulated as Drainage Reserve under Lease.



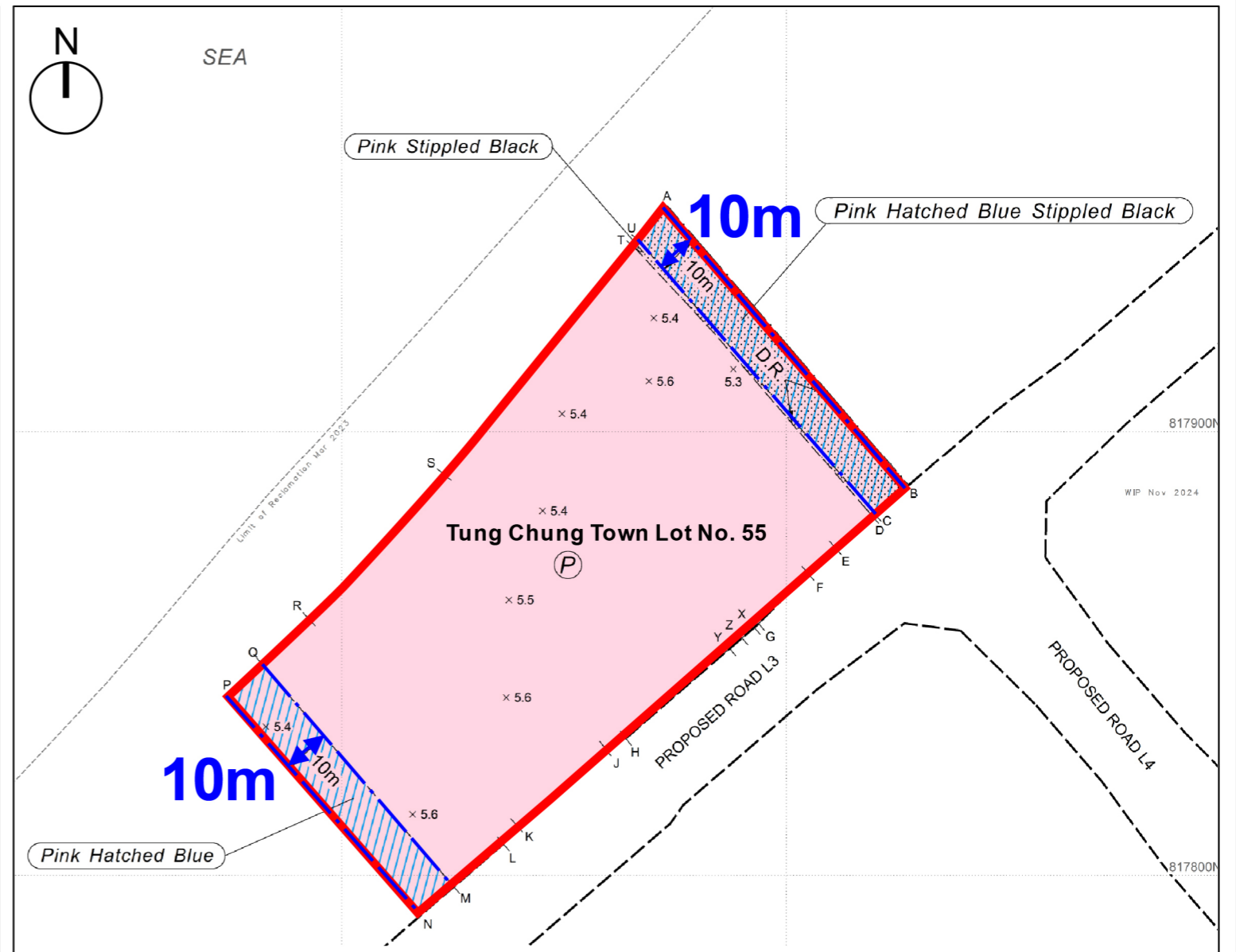
Legend			
	Application Site		
	Residential Development Intensity		
	Government, Institution of Community		
	Commercial Facilities		
	Proposed Road		
	Existing Road		
	Proposed Cycling Route		
	Existing Cycling Route		
	Key Pedestrian Route		
	Major Breezeway/View Corridor		
	Activity Node		
	Railway Station		

Title: Extract of Urban Design Concept Plan under the Explanatory Statement of the OZP

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Scale		Figure	2.1



**Extract of Tung Chung Extension Area  
Outline Development Plan (ODP)**



**Extract of Lease Plan**

Legend	
Application Site	

Title  
Non-Building Area within the Application Site to Serve as Breezeways and View Corridors

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Scale	Figure 2.2		

**Table 2.1 – List of Approved Applications with Minor Relaxation of BH in the Vicinity**

Approved Planning Applications	Existing BH Restriction	Approved BH	Magnitude of Increase
A/I-TCE/3	110mPD	125mPD	+15m (+13.64%)
A/I-TCE/4	110mPD 115mPD	130mPD 135mPD	+20m (+18.18%) +20m (+17.39%)
A/I-TCE/5	105mPD	108.39mPD	+3.39m (+3.23%)
A/I-TCE/6	70mPD	105mPD	+35m (+50%)

### 2.3 Land Status and Approved GBP Scheme

2.3.1 The Application Site, also known as Tung Chung Town Lot No. 55 (TCTL 55), is a land sale site which was awarded to the Applicant through public tender in February 2025. The site covers an area of about 10,648m<sup>2</sup>. After being awarded the site, the Applicant has proceeded with the detailed design of a residential development and in September 2025, a set of general building plan (GBP) for a residential development with one storey of basement carpark was approved by the Government for the site. This 2025 Approved Scheme (i.e. the Approved GBP Scheme) complies with the OZP restrictions (including the maximum BH restriction of 70mPD) and Lease conditions (including the building setbacks from the two NBAs to allow breezeways / view corridors to run alongside the eastern and western edges of the subject lot). The details of the Approved GBP Scheme and its comparison with the Proposed Scheme are depicted in **Section 3** below.

### 3 INDICATIVE DEVELOPMENT SCHEME

#### 3.1 Indicative Development Scheme

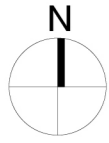
3.1.1 The Proposed Scheme, as compared to the Approved GBP Scheme, is mainly to relocate the carpark from underground to aboveground. Opportunities are also taken to include some design enhancement measures in the Proposed Scheme. The Indicative Block Plan, Floor Plans and Section Plans of the Proposed Scheme are shown in **Figures 3.1 to 3.5**. The key development parameters of the Proposed Scheme as well as its comparison with the Approved GBP Scheme are stipulated in **Table 3.1** below.

**Table 3.1 – Indicative Development Schedule (Comparison with Approved GBP Scheme)**

Development Parameters	Approved GBP Scheme (a)	Proposed Scheme (b)	Difference (b) – (a)
<b>Site Area</b>	About 10,648m <sup>2</sup>	About 10,648m <sup>2</sup>	No change
<b>Total Domestic GFA</b>	Not more than 37,268m <sup>2</sup>	Not more than 37,268m <sup>2</sup>	No change
<b>Total Domestic Plot Ratio</b>	Not more than 3.5	Not more than 3.5	No change
<b>Maximum Building Height (to the main roof)</b>	Not more than 70mPD	Not more than 76.5mPD	+6.5m (+9.29%)
<b>No. of Storeys (aboveground)</b>	19 <sup>(1)</sup>	20 <sup>(2)</sup>	+1
<b>Site Coverage</b>			
• <b>Height not exceeding 15m</b>	Not more than 100%	Not more than 100%	No change
• <b>Height over 15m</b>	Not more than 33.33%	Not more than 33.33%	No change
<b>No. of Residential Blocks</b>	2	2	No change
<b>No. of Units</b>	745	745	No change
<b>Average Flat Size</b>	About 50 m <sup>2</sup>	About 50 m <sup>2</sup>	No change
<b>Anticipated Population<sup>(3)</sup></b>	About 1,937	About 1,937	No change
<b>Resident's Clubhouse<sup>(4)</sup></b>	Not more than 1,677.06m <sup>2</sup>	Not more than 1,677.06m <sup>2</sup>	No change
<b>Private Open Space</b>	Not less than 1,937m <sup>2</sup>	Not less than 1,937m <sup>2</sup>	No change

Remarks:

- (1) Including 1 storey of E&M and 18 residential floors, above 1 level of basement carpark (excluding transfer plate).
- (2) Including 2 levels of aboveground carparks / E&M, 1 level of landscaped podium and 17 residential floors (excluding transfer plate).
- (3) The anticipated population is assumed to be 2.6 person-per-flat, with reference to Census and Statistics Department's website released in March 2025 ([https://www.censtatd.gov.hk/en/web\\_table.html?id=130-06806](https://www.censtatd.gov.hk/en/web_table.html?id=130-06806)) which shows Islands District average household size in 2024.
- (4) The residents' clubhouse GFA is not more than 4.5% of the domestic GFA and is exempted from plot ratio calculation.



TUNG CHUNG BAY



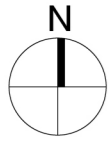
**Legend**

- Application Site Boundary
- Covered Walkway
- Residential
- Flat Roof Area / Landscape (Covered / Uncovered Area)
- Pool
- EVA / Driveway
- Carpark
- Transfer Plate
- Pink Hatched Blue Stippled Black Area (Under Lease)
- Pink Hatched Blue Area (Under Lease)
- Pink Stippled Black Area (Under Lease)

Title

Indicative Block Plan

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Scale	Figure		3.1



TUNG CHUNG BAY



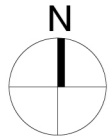
### Legend

- - - Application Site Boundary
- Lift Lobby to Residential Towers
- Flat Roof Area / Landscape (Covered / Uncovered Area)
- M&E
- Refuse Storage & Material Recovery Chamber
- EVA / Driveway
- Carpark
- Pink Hatched Blue Stippled Black Area (Under Lease)
- Pink Hatched Blue Area (Under Lease)
- Pink Stippled Black Area (Under Lease)

Title

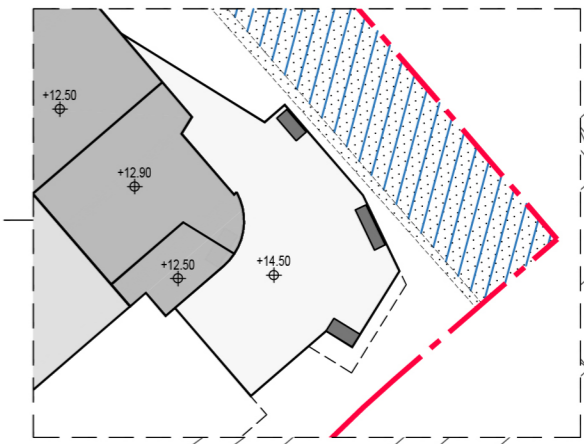
Indicative G/F Plan

Checked	DH	Drawn	PW
Rev	0	Date	Apr 2026
Scale		Figure 3.2	



TUNG CHUNG BAY

Part Plan at High Level



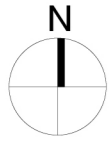
Legend

- - - Application Site Boundary
- Lift Lobby to Residential Towers
- Flat Roof Area / Landscape (Covered / Uncovered Area)
- Clubhouse
- M&E
- M&E Services at High Level
- Carpark
- Pink Hatched Blue Stippled Black Area (Under Lease)
- Pink Hatched Blue Area (Under Lease)
- Pink Stippled Black Area (Under Lease)

Title

Indicative 1/F Plan

Checked	DH	Drawn	PW
Rev	0	Date	Apr 2026
Scale	Figure		3.3



TUNG CHUNG BAY



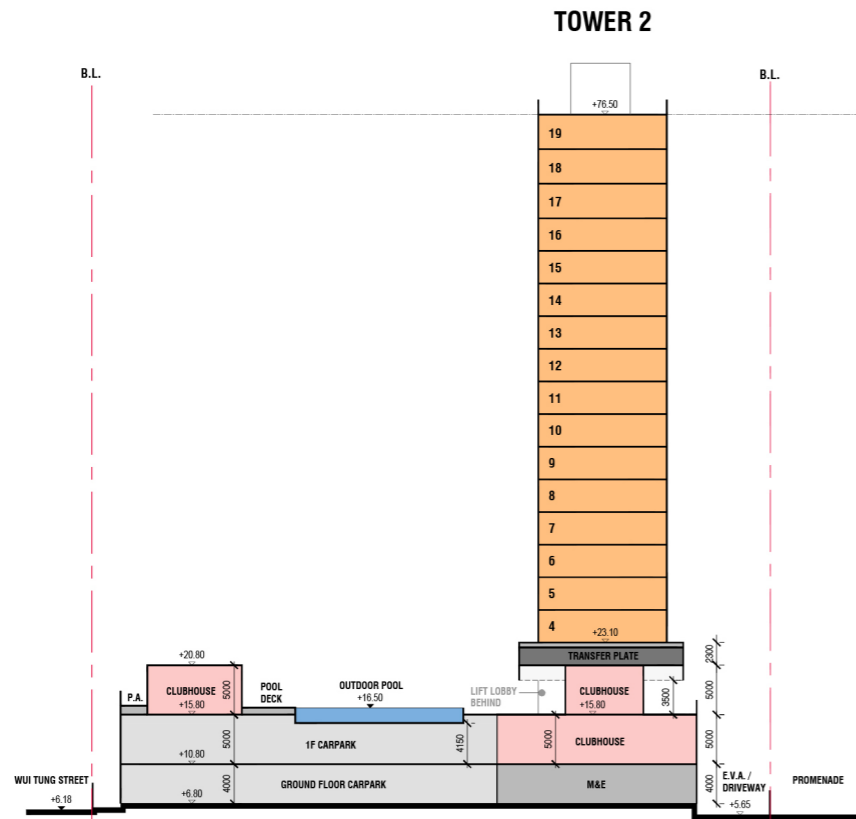
### Legend

- - - Application Site Boundary
- Covered Walkway
- Lift Lobby to Residential Towers
- Flat Roof Area / Landscape (Covered / Uncovered Area)
- Clubhouse
- Pool
- M&E
- Transfer Plate
- Pink Hatched Blue Stippled Black Area (Under Lease)
- Pink Hatched Blue Area (Under Lease)
- Pink Stippled Black Area (Under Lease)

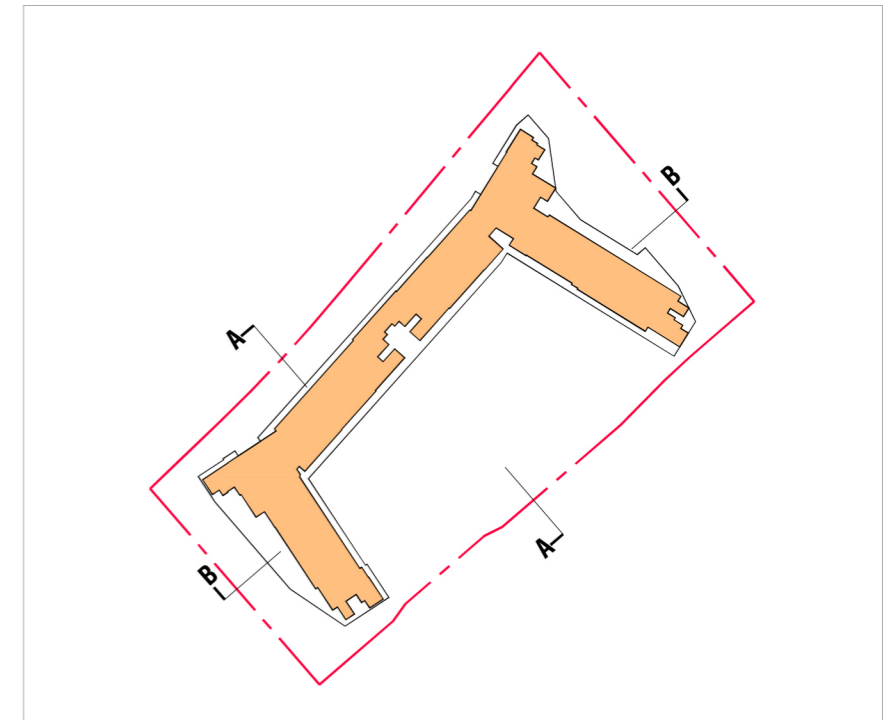
Title

Indicative 2/F Plan

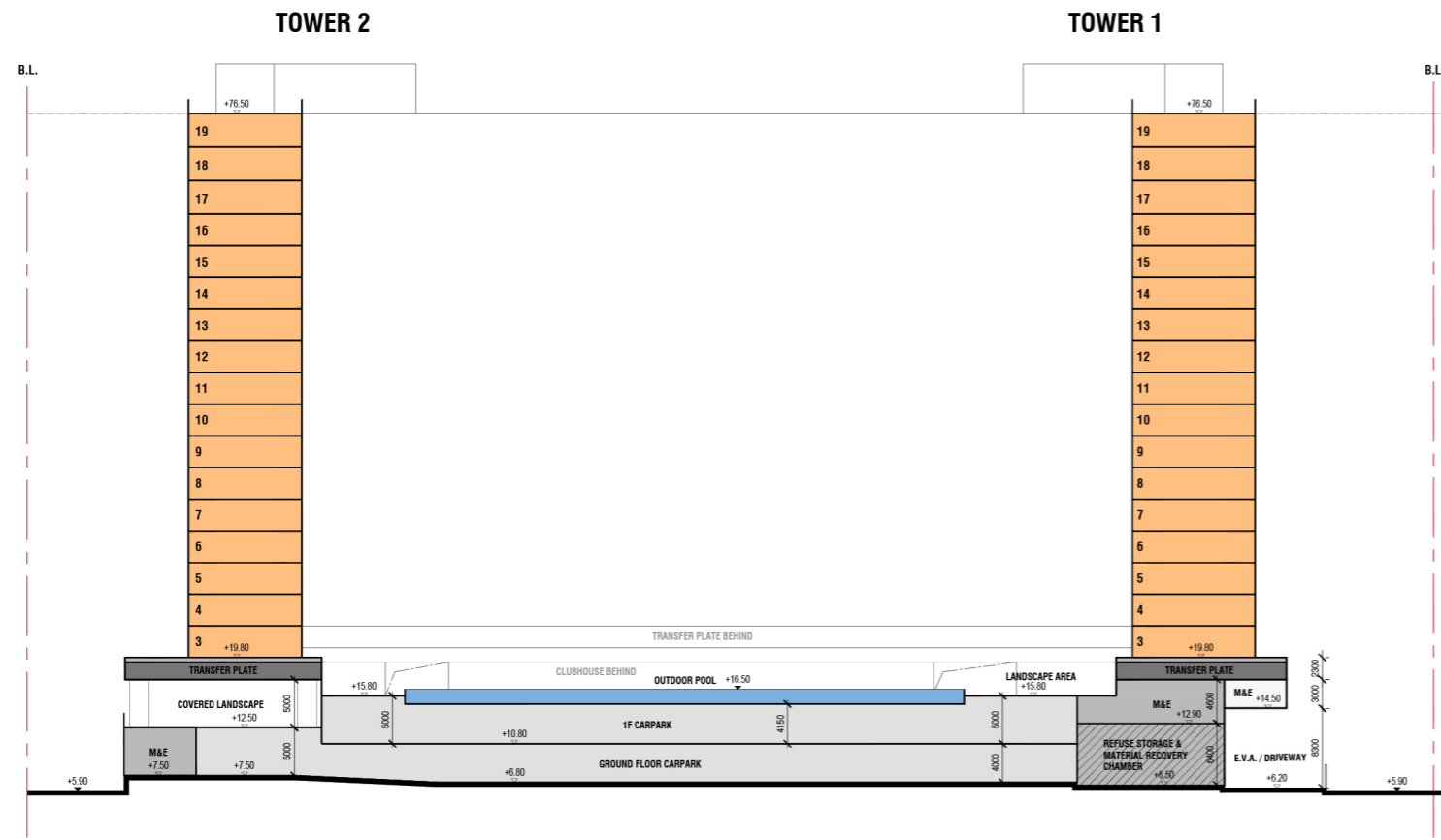
Checked	DH	Drawn	PW
Rev	0	Date	Apr 2026
Scale	Figure		3.4



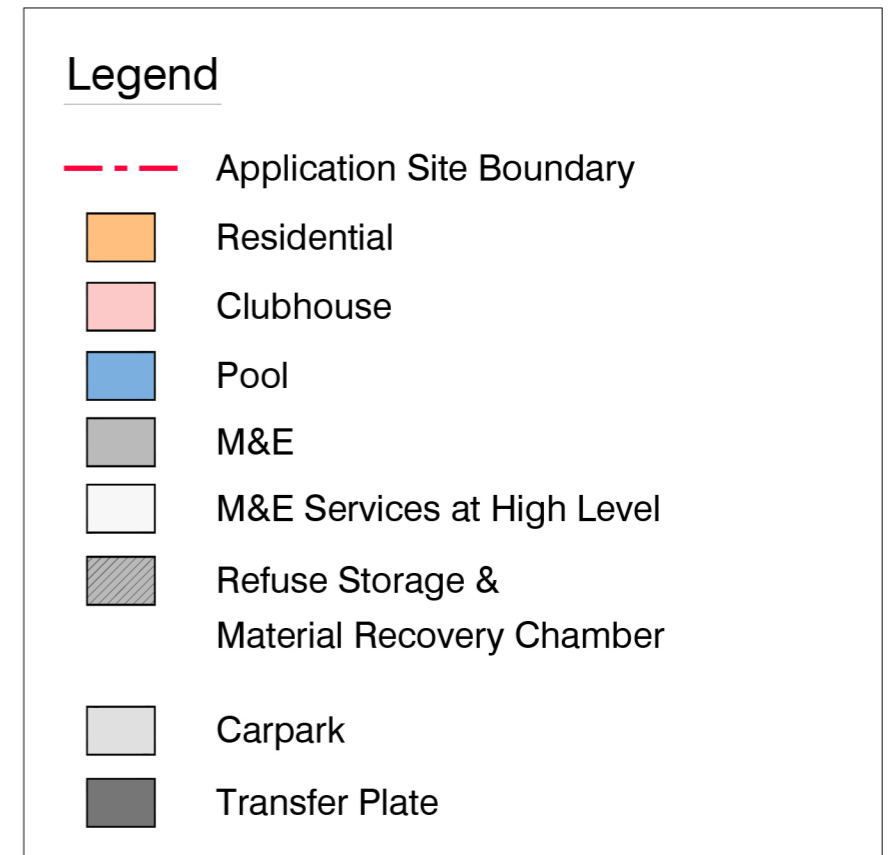
Section A-A



KEY PLAN



Section B-B



Title

Indicative Section Plans

Checked	DH	Drawn	PW
Rev	0	Date	Apr 2026
Scale	Figure 3.5		

### **3.2 Comparison with Approved GBP Scheme and Design Measures of Proposed Scheme**

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

- 3.2.1 When compared with the Approved GBP Scheme, the Proposed Scheme has relocated the carpark from the basement level to the aboveground level, which results in a minor increase in building height by 6.5m.
- 3.2.2 Under the Approved GBP Scheme, given that the whole basement floor could largely be utilized to accommodate car parking spaces, 1 storey of basement was found sufficient to accommodate all the required car parking spaces. Yet, under the Proposed Scheme, given that aboveground floors need to accommodate various other uses (e.g. residents' lift lobbies, clubhouse facilities, E&M / plant rooms, landscape areas, driveway / uncovered EVA, vehicular entrance area, etc.), the aboveground carparks have to be split up into portions, occupying part of G/F and part of 1/F of the residential development.
- 3.2.3 After splitting up into 2 storeys, the floor-to-floor height of each aboveground carparks under the Proposed Scheme (i.e. not more than 4m on the ground floor and not more than 5m on the first floor) remains similar to the original floor-to-floor height of the basement carpark under the Approved GBP Scheme, which was not more than 5m.

#### Same Development Parameters and Floor-to-Floor Height as per the Approved GBP Scheme

- 3.2.4 Other than the changes in building height due to the aboveground carparks, all other development parameters remain the same as per the Approved GBP Scheme. When compared with the Approved GBP Scheme, the Proposed Scheme has the same maximum GFA / plot ratio, site coverage, no. of blocks, no. of units, as well as the same floor-to-floor height for typical residential floors (i.e. 3.3m) and top three storeys of residential floors (i.e. 3.5m).

### Similar Building Layout and NBAs

3.2.5 The Proposed Scheme also has similar tower layout and disposition when compared with the Approved GBP Scheme. Same as the Approved GBP Scheme, the Proposed Scheme has provided the two 10m-wide NBAs along the north-eastern and south-western boundaries of the site to serve as breezeways / view corridors in accordance with the urban design concept plan for the Tung Chung Extension Area.

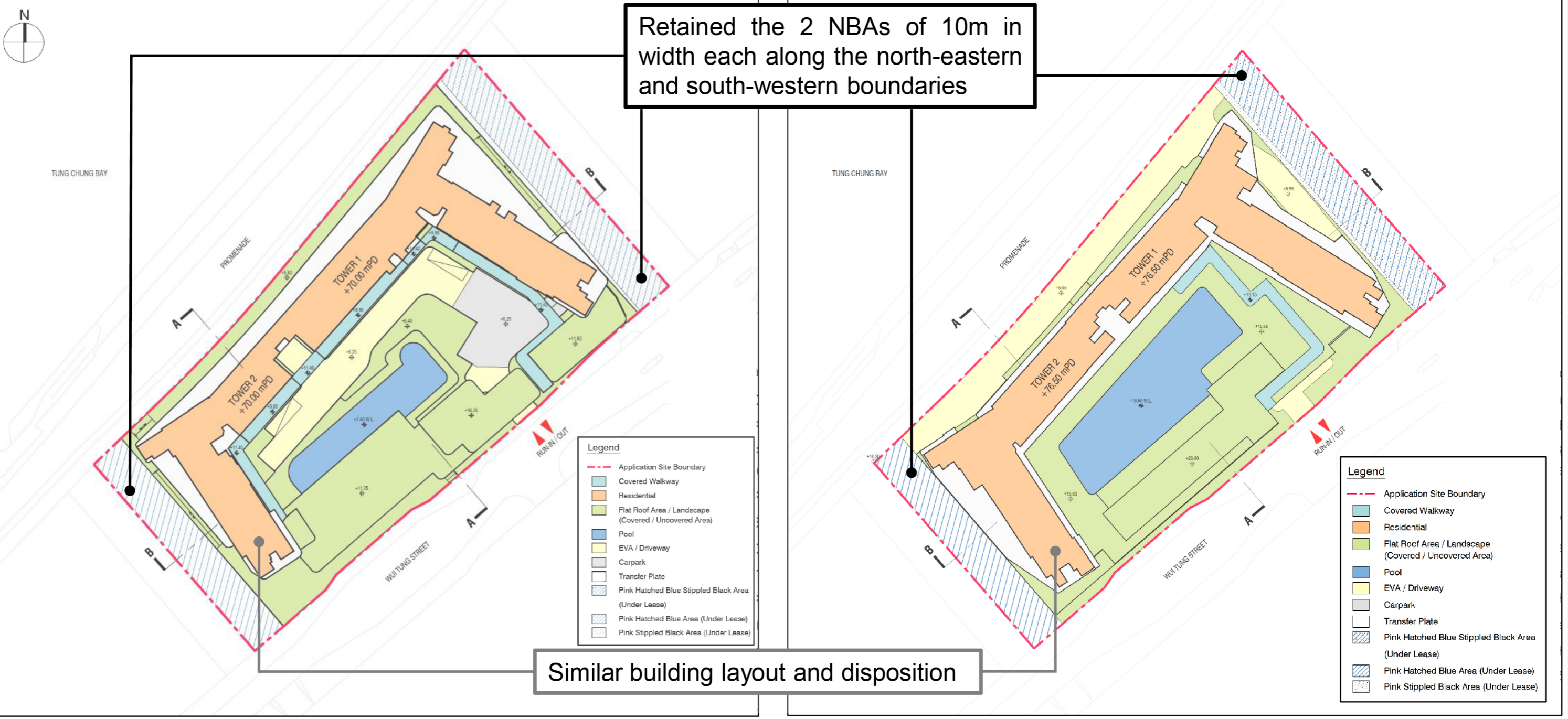
### Further Podium Setback from the Waterfront and Incorporation of More Permeable Design

3.2.6 Under the Approved GBP Scheme, the podium was generally setback along the north-western boundary of the site from the promenade by about 3.7m. Under the Proposed Scheme, the Applicant has taken the opportunity to further setback the podium by about 2.3m ~ 3.75m, hence, the podium is now generally setback along the north-western boundary from the promenade by about 7.45m (with approximately 6m at the narrowest point). In addition, a permeable design with the provision of two void areas (each about 6m in width and 3.5m in height) are proposed on 2/F under the Proposed Scheme. These design measures intend to further enhance the permeability of the Application Site as far as practicable.

3.2.7 The comparison between the Approved GBP Scheme and the Proposed Scheme is illustrated in **Figures 3.6 to 3.9**.

## **3.3 Access, Circulation and Car Parking Provision**

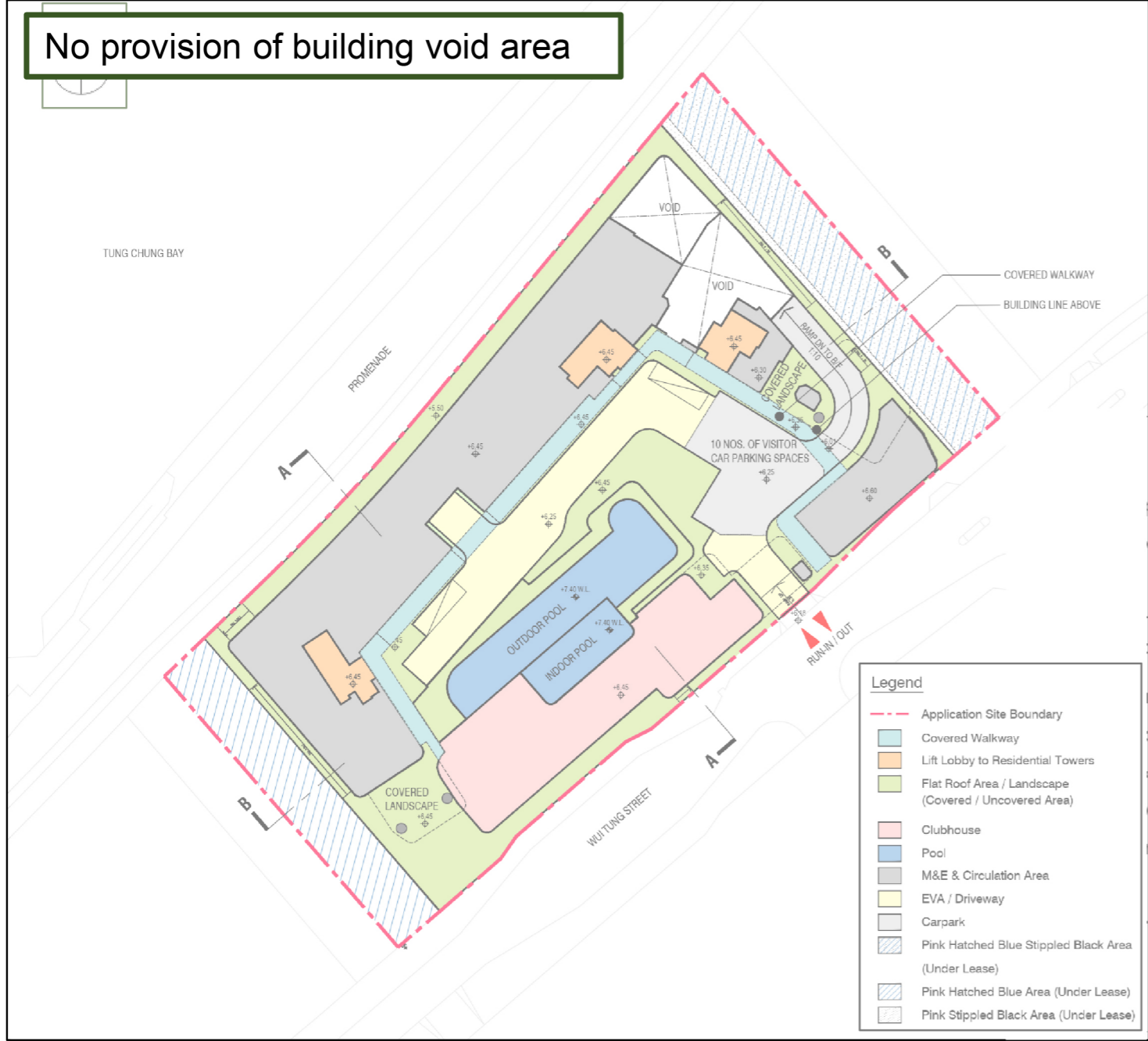
3.3.1 The Application Site is served by the existing Wui Tung Street (i.e. Road L3 of the Tung Chung Extension Area). Since the Proposed Scheme has the same no. of flats as compared with the Approved GBP Scheme, the proposed internal car parking and servicing provision are largely the same as the Approved GBP Scheme. The details of such provision are summarised in **Table 3.2**.



**Approved GBP Scheme (MLP)**

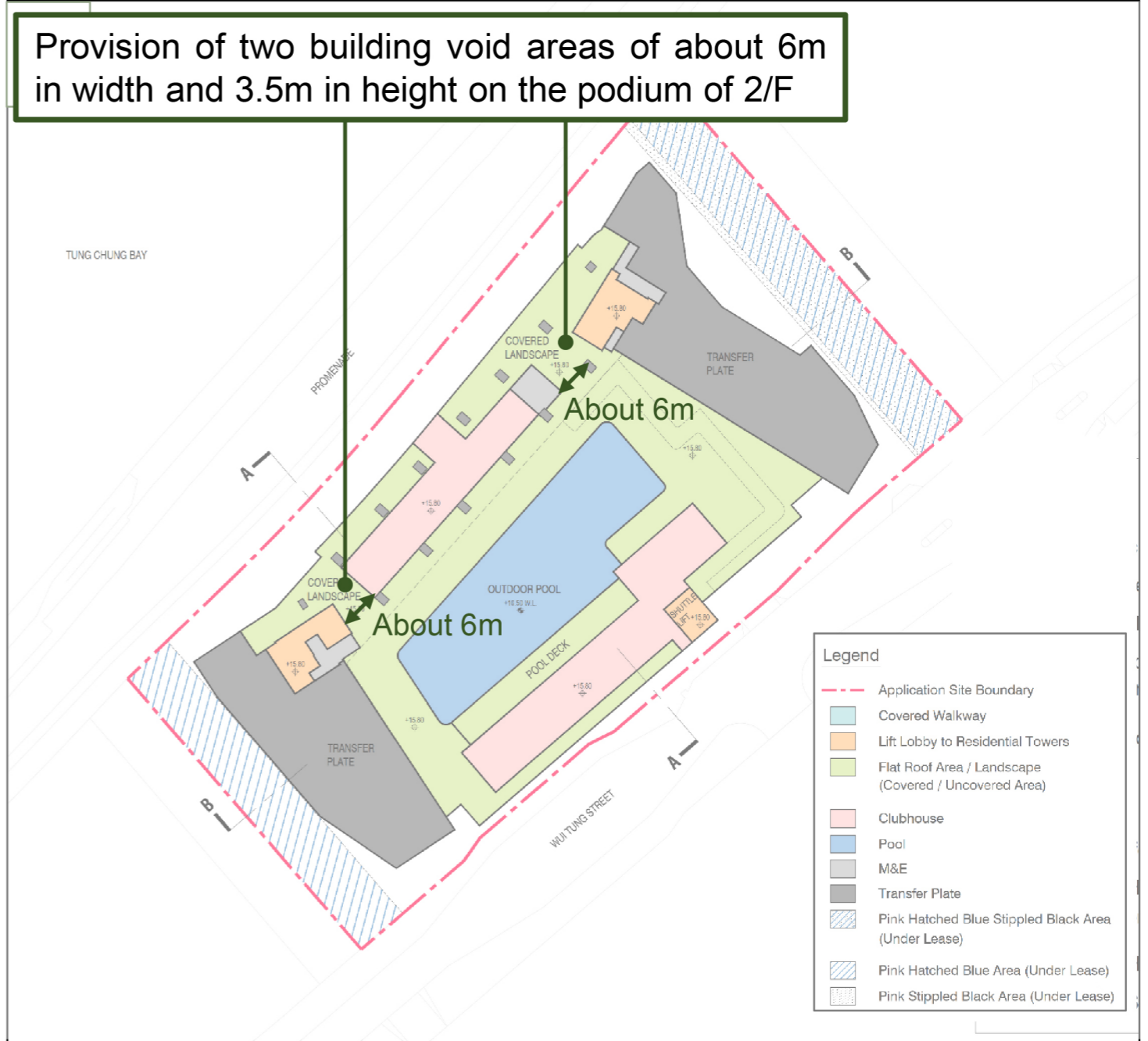
**Proposed Scheme (MLP)**

No provision of building void area

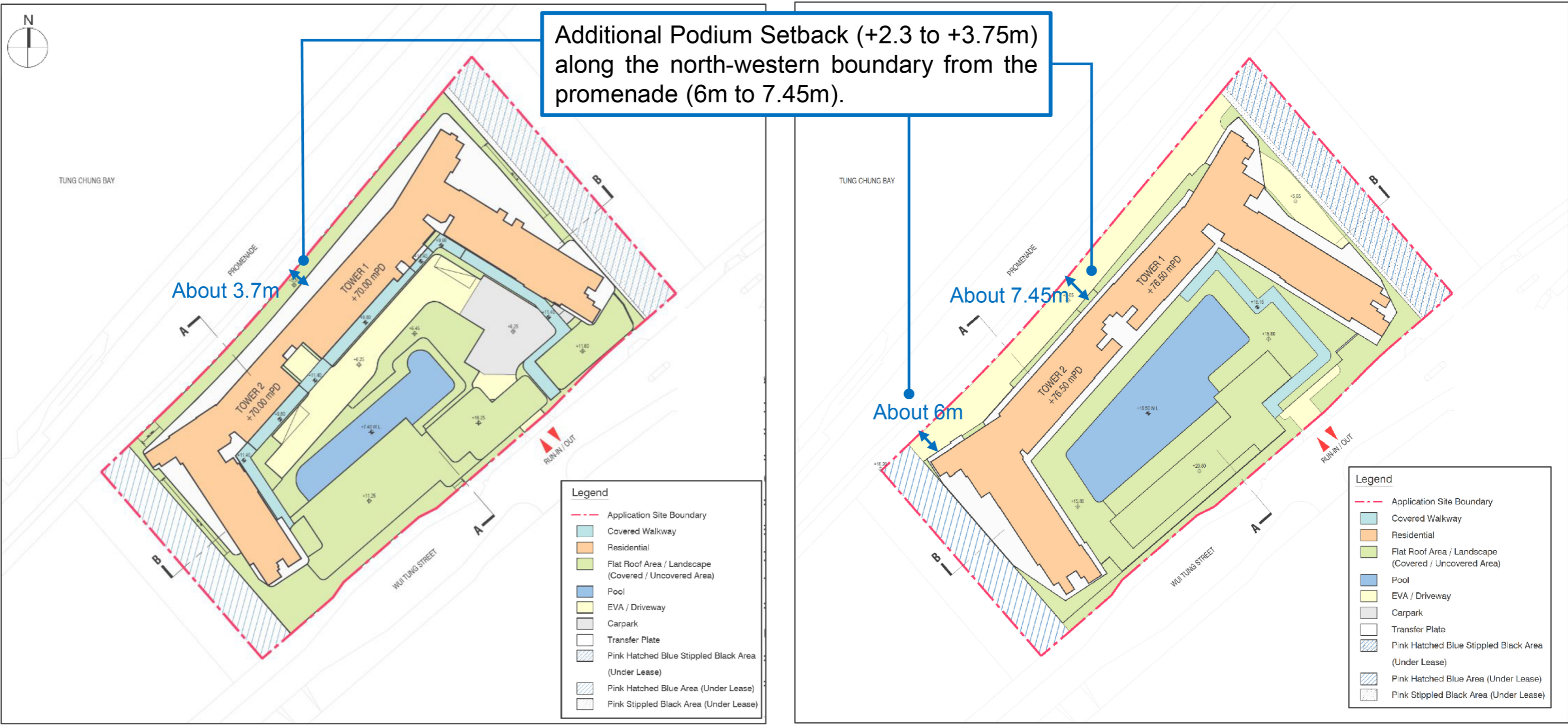


**Approved GBP Scheme (G/F Plan)**

Provision of two building void areas of about 6m in width and 3.5m in height on the podium of 2/F



**Proposed Scheme (2/F Plan)**



**Approved GBP Scheme (MLP)**

**Proposed Scheme (MLP)**

Same floor-to-floor height for typical residential floors (i.e. 3.3m) and top three storeys of residential floors (i.e. 3.5m)

**Legend**

- Application Site Boundary
- Residential
- Clubhouse
- Pool
- M&E & Circulation Area
- Carpark
- Transfer Plate

**Legend**

- Application Site Boundary
- Residential
- Clubhouse
- Pool
- M&E
- M&E Services at High Level
- Refuse Storage & Material Recovery Chamber
- Carpark
- Transfer Plate

Proposed floor-to-floor height of the proposed above-ground car park is similar to that of the approved GBP scheme

Basement Carpark  
Not more than 5m

Not more than 5m on the 1/F  
Not more than 4m on the G/F

**Approved GBP Scheme (Section)**

**Proposed Scheme (Section)**



**Table 3.2 - Parking and Servicing Facilities Provisions (Comparison with Approved GBP Scheme)**

<b>Components</b>	<b>Approved GBP Scheme (a)</b>	<b>Proposed Scheme (b)</b>	<b>Difference (b) – (a)</b>
Private Car Parking Space	201	202	+1 (+0.5%)
Visitor Car Parking Space	10	10	No Change
Motorcycle Parking Space	8	8	No Change
Bicycle Parking Space	44	44	No Change
Loading/ Unloading Bay	2	2	No Change

### **3.4 Tentative Completion Year**

3.4.1 The Proposed Development is tentatively scheduled for completion by 2030.

## 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 (i) a visual appraisal and (ii) simple review of the air ventilation impact assessment if the site involves major breezeways. 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 and a simple review on air ventilation aspect were conducted and summarized below.

### 4.1 Visual Appraisal

4.1.1 Assessment on the visual impact of the planned developments in the Tung Chung Extension Area (including the permitted residential use in the Application Site and its adjacent sites) has been conducted by the government under the Tung Chung New Town Extension Study. The visual appraisal prepared for the current planning application largely follows the visual envelope of this government study, but with the relevant 3D models / photomontages updated based on the Approved GBP Scheme (to serve as the baseline case) and the Proposed Scheme. A total of 3 viewpoints ("VPs") are selected that can best facilitate the Board to visualize and compare the Approved GBP Scheme and the Proposed Scheme at the Application Site with the surrounding context.

#### Vantage Points

4.1.2 The Application Site is located at the waterfront area of the Tung Chung Extension Area, which is opposite to the Chek Lap Kok area across Tung Chung Bay. Having considered the surrounding context, the following VPs are selected:

*VP 1 – Chek Lap Kok Road*

- 4.1.3 Chek Lap Kok Road is located in proximity to the Hong Kong International Airport and the Hong Kong Zhuhai Macao Bridge Hong Kong Port, which are all located to the north of the planned Tung Chung Extension Area across the Tung Chung Bay. The road is frequently used by international and cross-boundary commuters of the airport and the bridge.

*VP 2 – Scenic Hill Pavilion*

- 4.1.4 Scenic Hill is a popular hiking location in the Chek Lap Kok area, which is in proximity to the Tung Chung town centre. To the peak of the hill is the scenic hill pavilion, which enjoys a panoramic view towards the existing Tung Chung town centre and the planned Tung Chung Extension Area. The pavilion is frequently visited by local residents and hikers for leisure and recreational activities.

*VP 3 – Tung Chung New Development Pier*

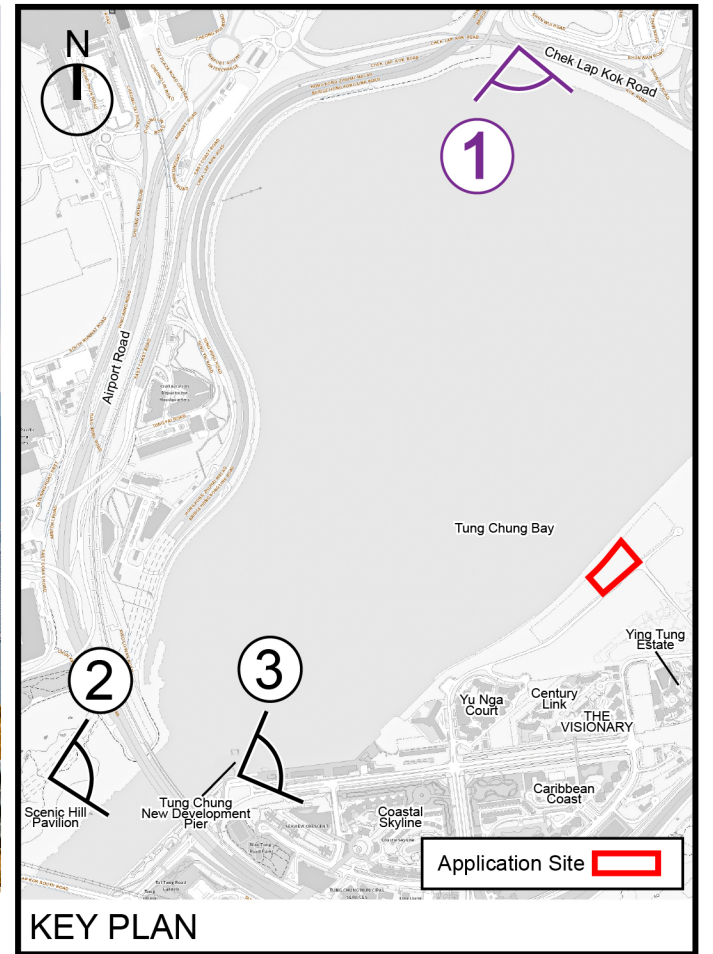
- 4.1.5 Tung Chung New Development Pier is located at Tung Chung East Promenade in proximity to Tung Chung town centre. The pier offers ferry route to Tuen Mun and Tai O and is frequently used by local residents of Tung Chung.

*Discussions on Visual Impacts on VPs*

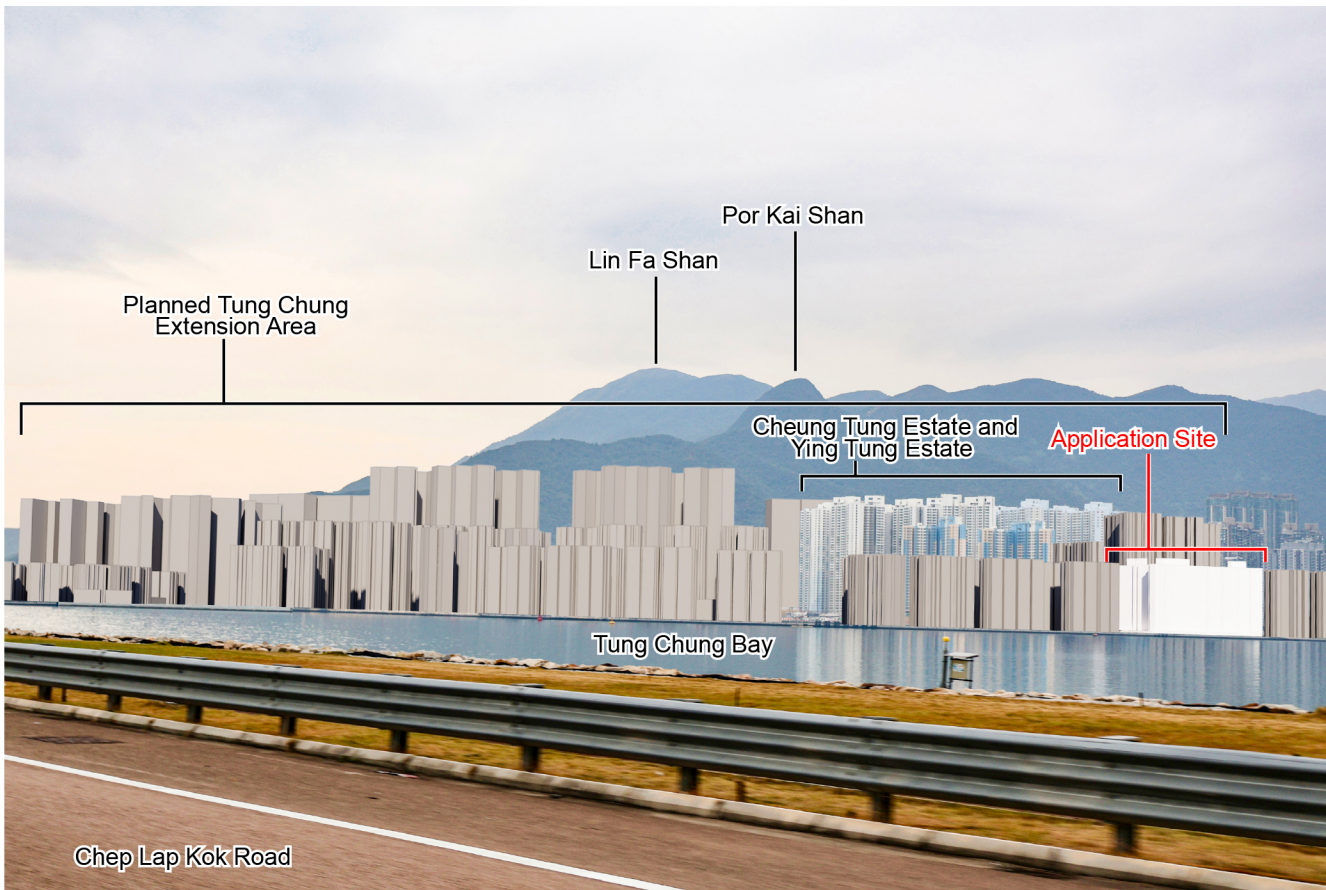
- 4.1.6 **VP 1 (Photomontage in Figure 4.1):** VP 1 is located about 1.5km to the north of the Application Site across the Tung Chung Bay. The visual composition of the Proposed Scheme is largely similar to the Approved GBP Scheme with only a very minor increase in BH, which is compatible with the surrounding planned medium-to-high-rise developments of the Tung Chung Extension Area. The main visual elements, which are Tung Chung Bay in the foreground as well as mountain backdrop and open view of sky in the background will not be affected. The overall stepped building profile will also be preserved considering the increase of BH of 6.5m only. The change in visual context is expected to be negligible as compared to the Approved GBP Scheme.



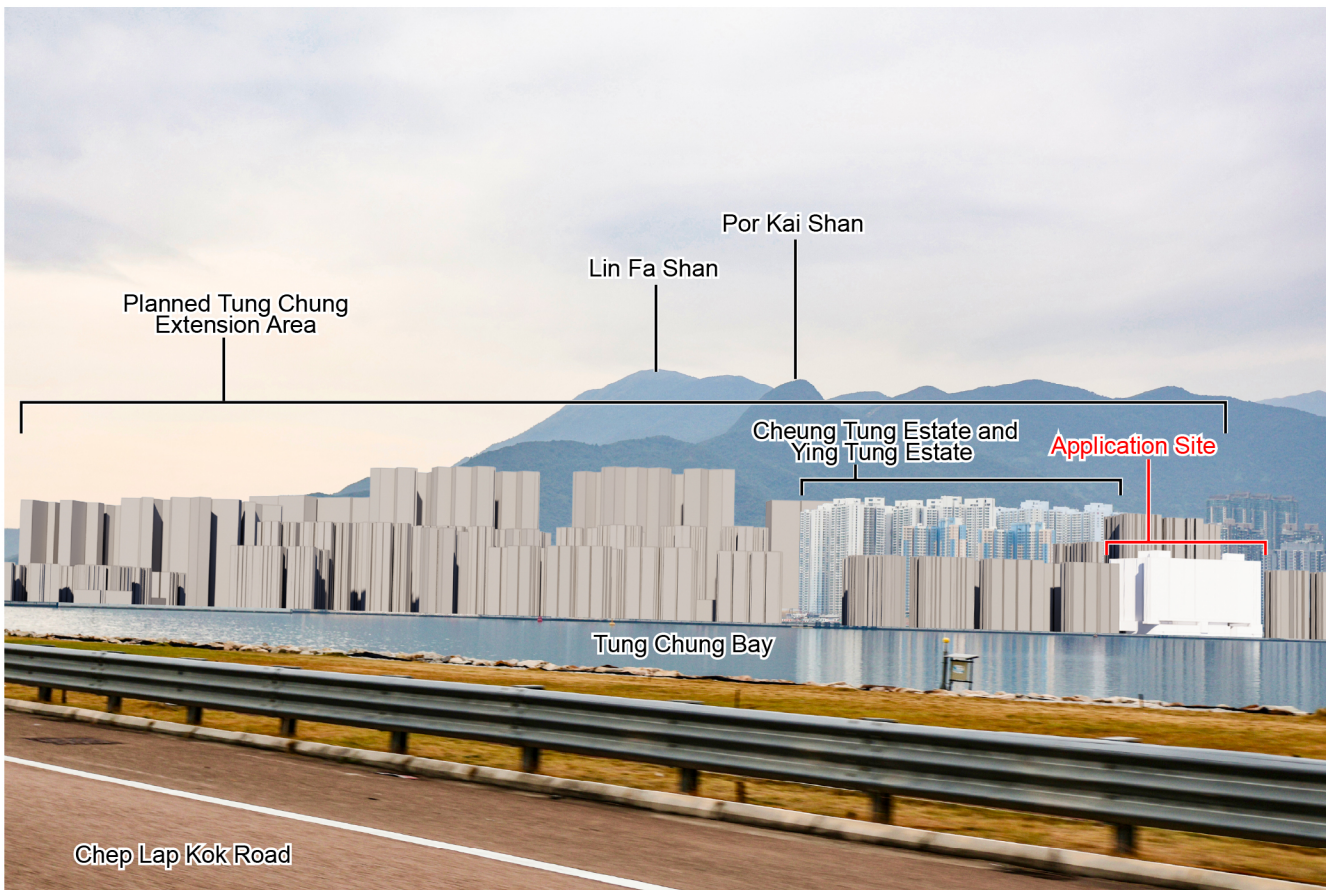
Existing Condition



KEY PLAN



Approved GBP Scheme – After the Implementation of the Tung Chung Extension Area



Proposed Scheme – After the Implementation of the Tung Chung Extension Area

4.1.7 **VP 2 (Photomontage in Figure 4.2):** VP 2 is located about 1.6km to the southwest of the Application Site. With such distance and elevated location, 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 medium-to-high-rise developments of the Tung Chung Extension Area. The main visual elements, which are vegetation and Tung Chung Bay 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 as compared to the Approved Scheme.

4.1.8 **VP 3 (Photomontage in Figure 4.3):** VP 3 is located about 1.2km to the southwest of the Application Site. With such viewing angle, the Proposed Scheme is able to blend in well with the surrounding planned medium-to-high-rise developments of the Tung Chung Extension Area. The main visual elements, which are Tung Chung Bay in the foreground and open view of sky in the background will not be affected. The change in visual context is expected to be negligible as compared to the Approved Scheme.

### Conclusion

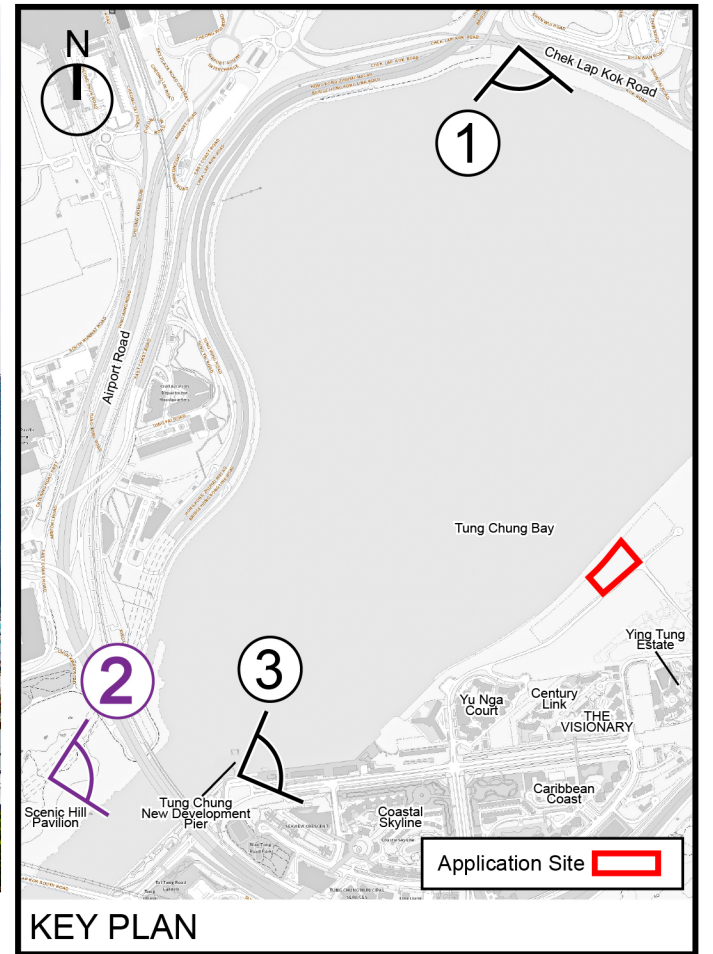
4.1.9 With consideration of the existing and planned surrounding context of the Application Site, it is concluded that the overall visual impact induced by the Proposed Scheme due to the minor relaxation of BH as compared to the baseline case (i.e. the Approved GBP Scheme) is negligible.

## **4.2 Air Ventilation Considerations**

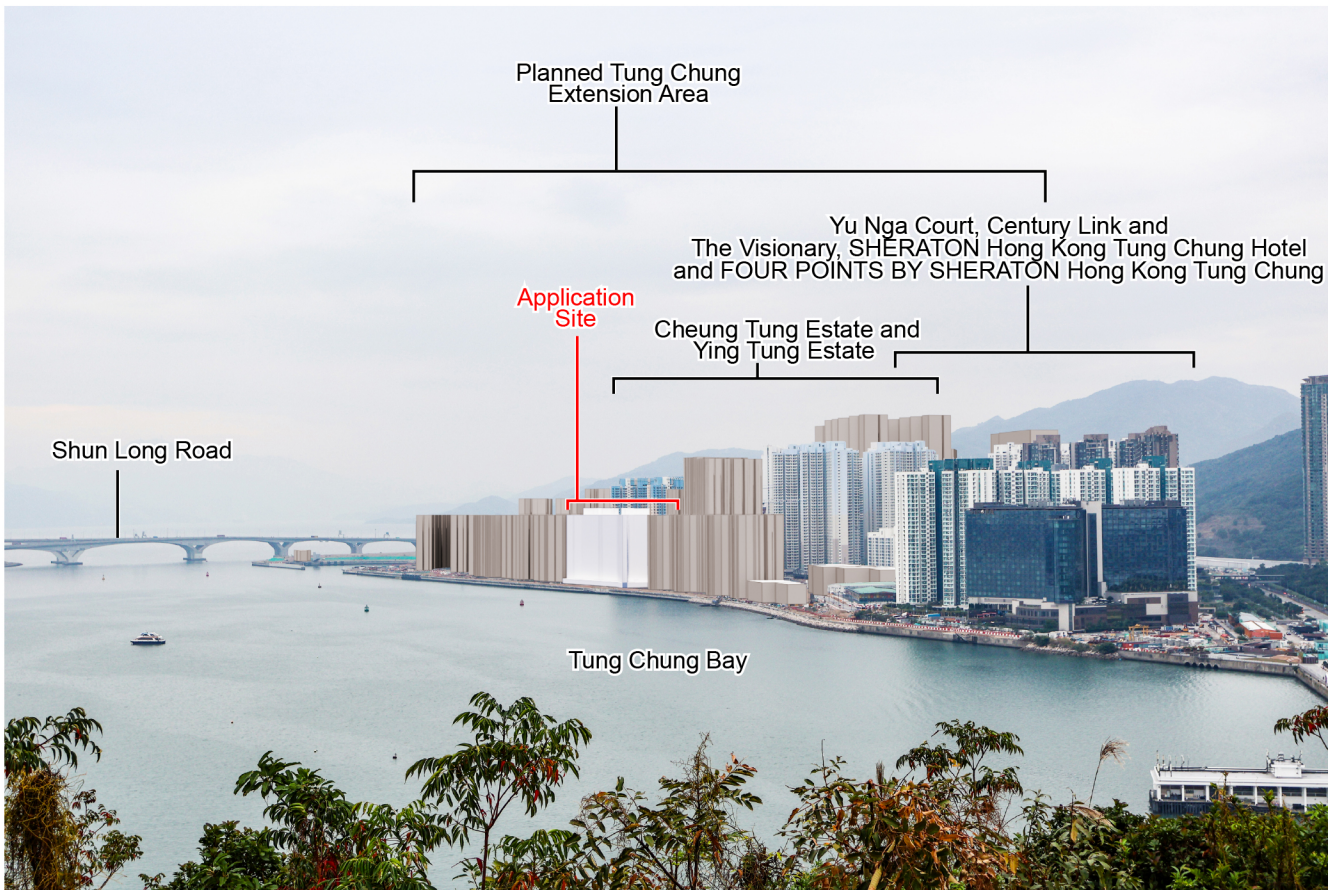
4.2.1 Assessment on air ventilation of the planned developments in the Tung Chung Extension Area (including the permitted residential use in the Application Site and its adjacent sites) has also been conducted by the Government in the Tung Chung New Town Extension Study. As mentioned in **Section 2.2**, there are two NBAs, planned to serve as the breezeways / view corridors, running alongside the eastern and western edges of the site boundary. As mentioned in **Section 3.2**, the Proposed Scheme has retained these two NBAs (10m wide for each) along the north-eastern and south-western boundaries of the site. These two NBAs, together with the other breezeways / view corridors in the Tung Chung Extension Area serve the purpose of (i) creating a comprehensive breezeway system to promote better air ventilation and urban climate and (ii) providing views to the mountain backdrop



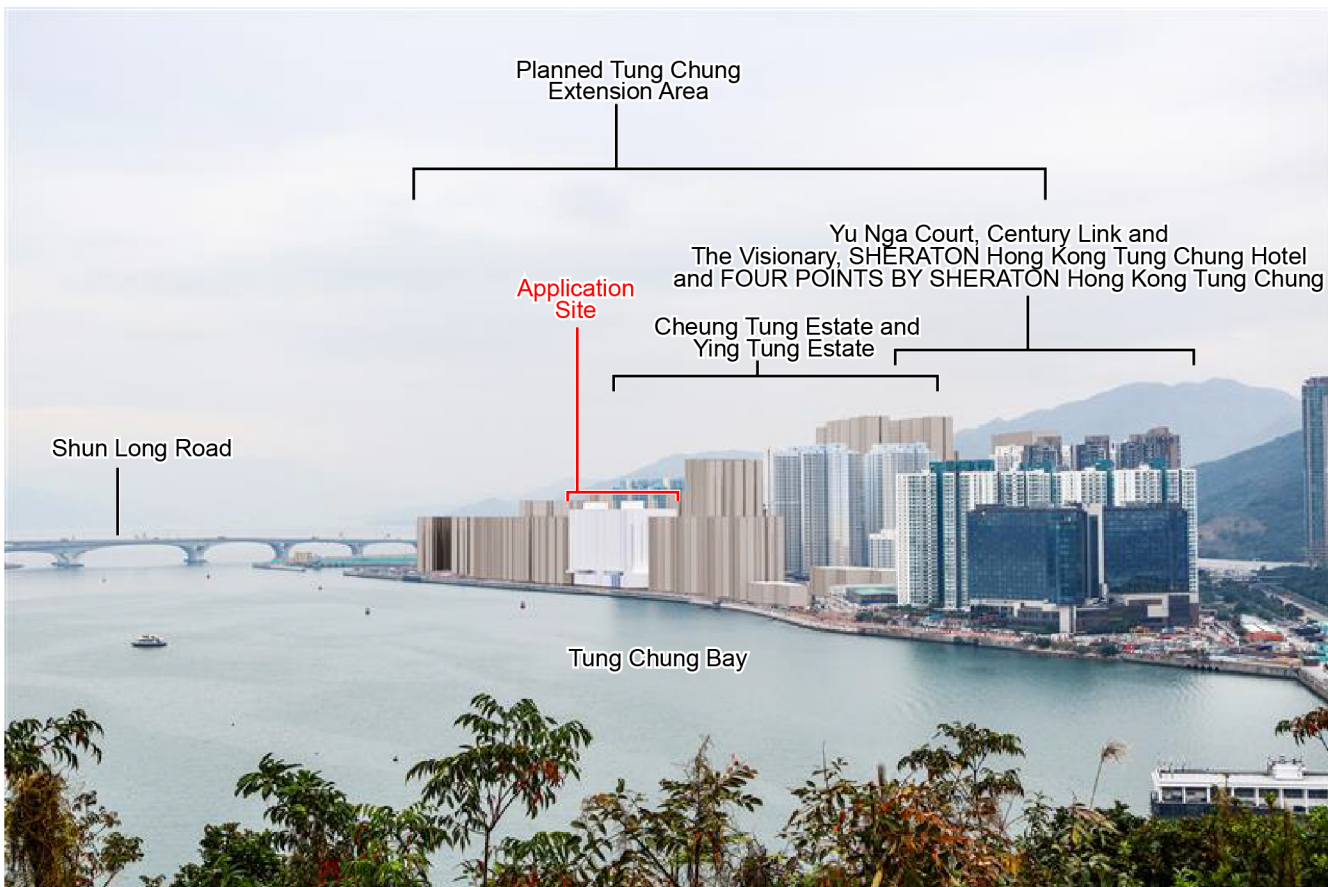
Existing Condition



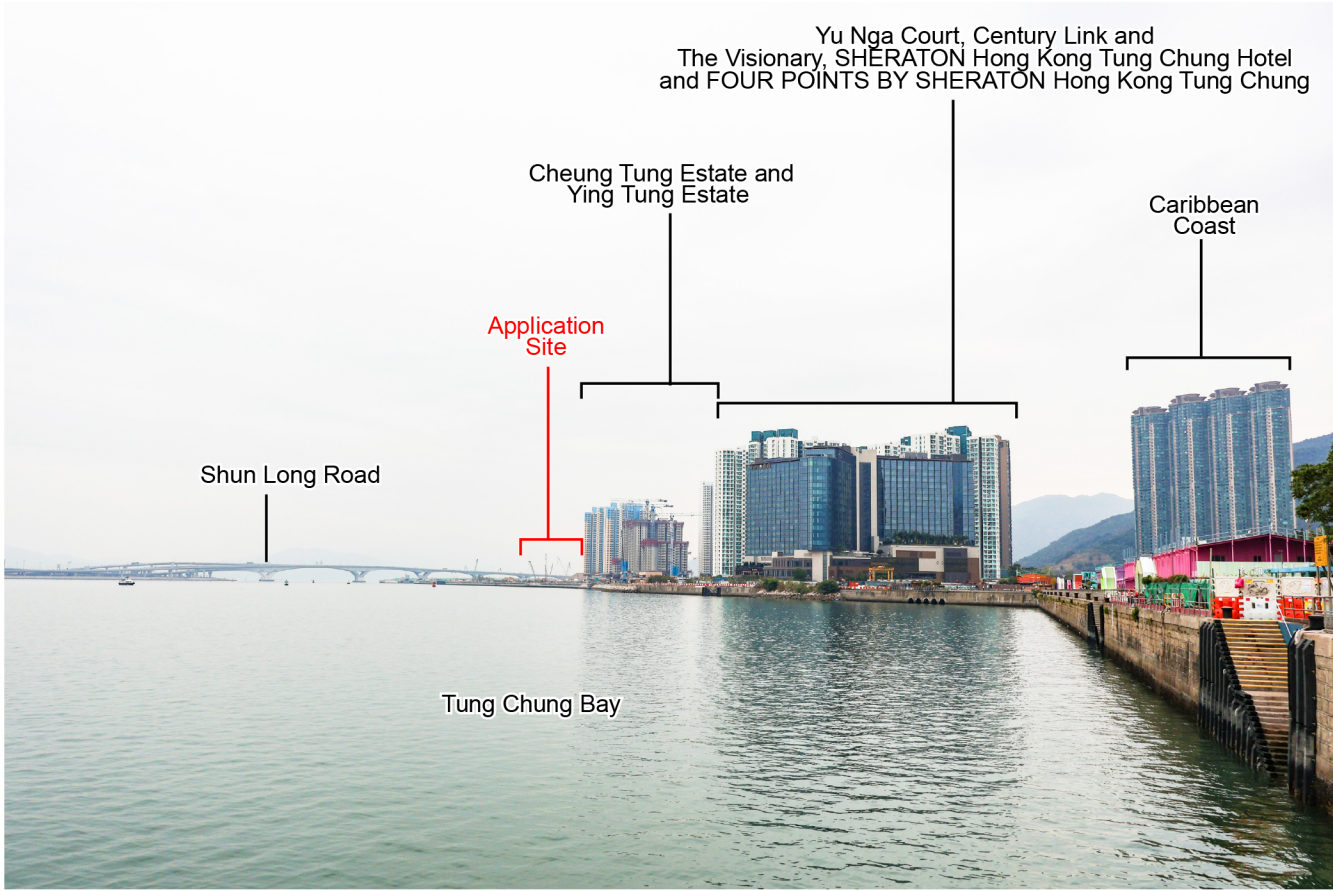
KEY PLAN



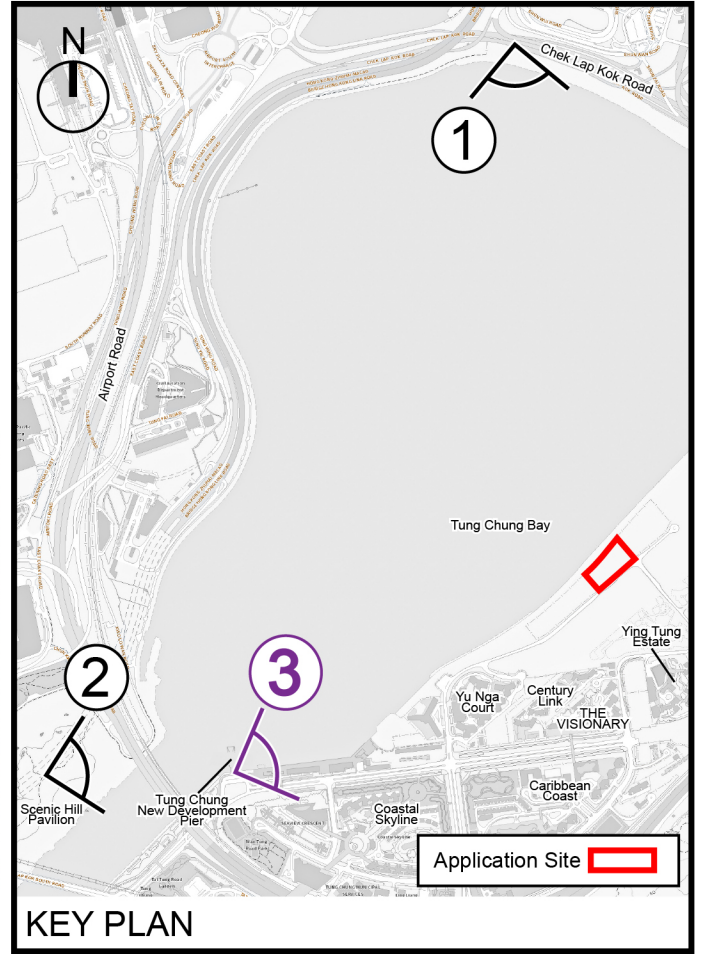
Approved GBP Scheme – After the Implementation of the Tung Chung Extension Area



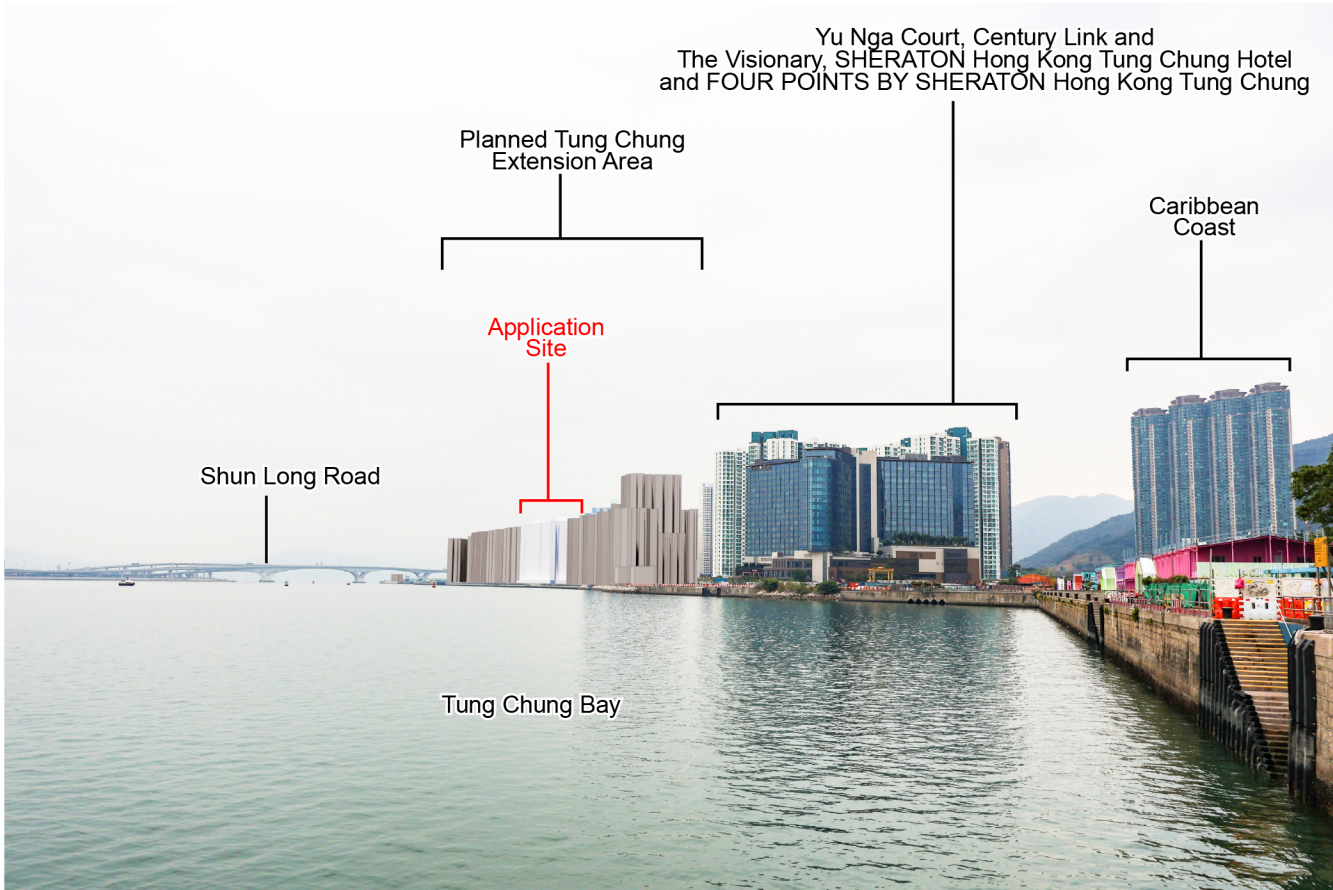
Proposed Scheme – After the Implementation of the Tung Chung Extension Area



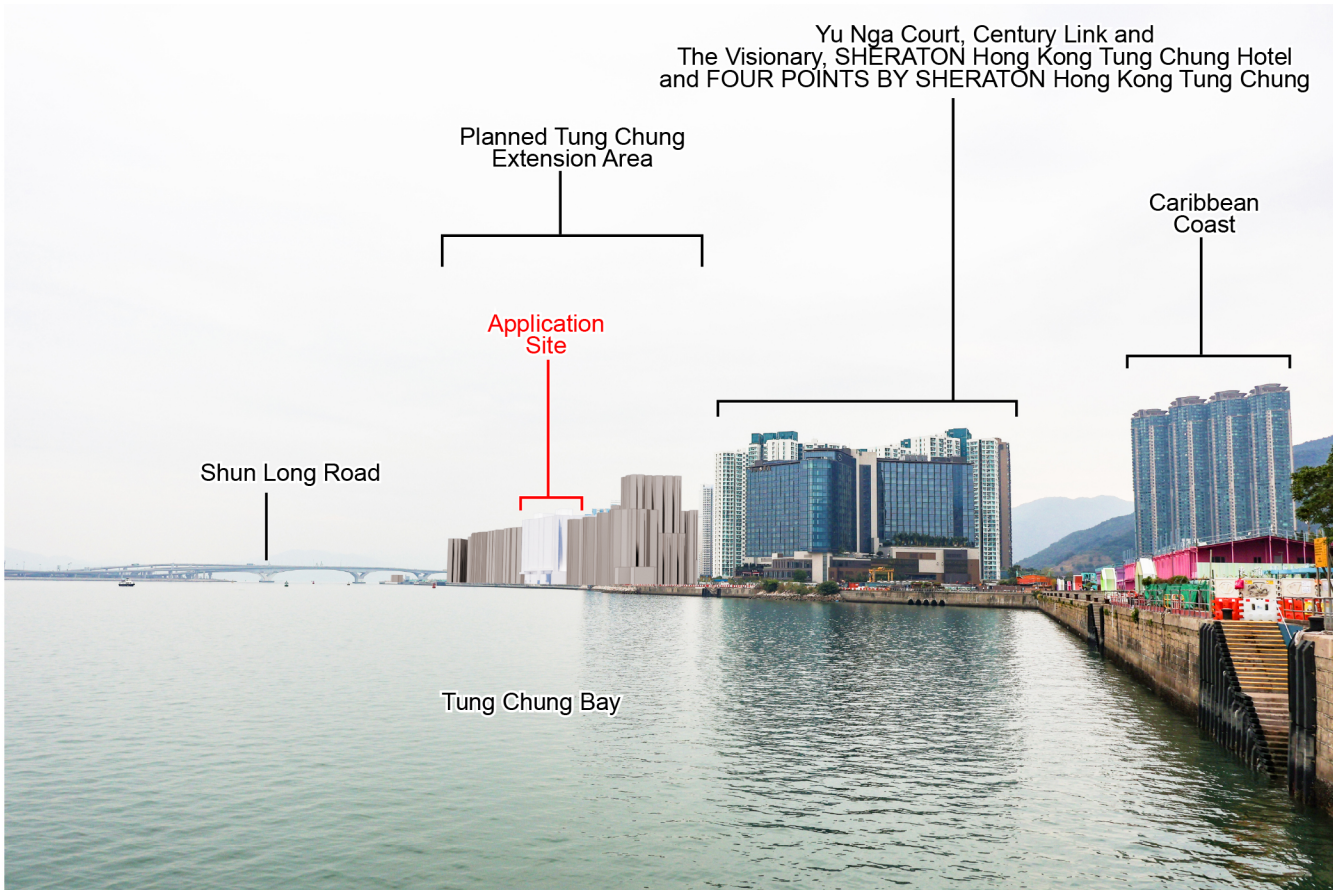
Existing Condition



KEY PLAN



Approved GBP Scheme – After the Implementation of the Tung Chung Extension Area



Proposed Scheme – After the Implementation of the Tung Chung Extension Area

and the sea from various nodes and open spaces within the area. With these two NBAs maintained in the Proposed Scheme, it is anticipated that the overall air ventilation of the Tung Chung Extension Area would not be affected.

4.2.2 In addition, when compared to the Approved GBP Scheme, the Proposed Scheme has taken the opportunity to include (i) additional podium setback of about 2.3m ~ 3.75m along the north-western boundary from the promenade and (ii) permeable design by providing two void areas (each about 6m in width and 3.5m in height) on 2/F of the Proposed Scheme (**see Figures 3.6 to 3.9**). Such design measures can further enhance the permeability of the proposed residential development as far as practicable.

### 4.3 Other Considerations

4.3.1 Since the Proposed Scheme conforms to the planning intention, land uses and plot ratio restriction of the OZP, and maintains the same development parameters (including the GFA, no. of units and car parking provision) as the Approved GBP Scheme, the proposed minor relaxation of BH for the proposed development will not induce additional traffic and engineering impacts to its surrounding. In terms of aircraft / helicopter noise, according to the approved EIA report for Expansion of Hong Kong International Airport into a Three-Runway System (Ref.: AEIAR-185/2014), the Application Site is located outside the Noise Exposure Forecast (NEF) 25 Contour of the Hong Kong International Airport (HKIA). On the other hand, it is also noted that the Application Site is located in close proximity to the HKIA and helicopter holding areas/ flying routes, and therefore may be subject to aircraft/ helicopter noise disturbances. Under such circumstances, better insulation would be considered for the proposed residential development at detailed design stage subject to further review and study. In future, the prospective buyers or future residents will also be duly informed of such potential noise impact, e.g. via sales brochure. The Proposed Scheme is therefore not anticipated to have any other technical impacts.

## **5 DEVELOPMENT JUSTIFICATIONS AND MERITS**

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

5.1.1 The Proposed Scheme, as compared to the Approved GBP Scheme, is mainly 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. 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 and a review on air ventilation (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.

### **5.2 Proposed Minor Relaxation of Building Height is for the Incorporation of Aboveground Carparks only with No Changes to the Floor-to-Floor Heights as per the Approved GBP Scheme**

5.2.1 Since relocating the carpark from basement to aboveground will inevitably be constrained by other uses / facilities ancillary to the residential development (e.g. the vehicular entrance area, EVA / driveway, landscape areas, lift lobbies, clubhouse facilities, E&M / plant rooms, etc.) which have already been planned for / provided on the aboveground levels, the original single storey basement carpark occupying almost the entire floor / storey has to be split up into 2 storeys, with a portion on G/F and a portion on 1/F, in order to accommodate the same no. of car parking spaces. After splitting up into 2 storeys, the floor-to-floor height of each aboveground carparks under the Proposed Scheme (i.e. not more than 4m on the ground floor and not more than 5m on the first floor) remains similar to the original floor-to-floor height of the basement carpark under the Approved GBP Scheme, which was not more than 5m.

5.2.2 After accommodating the residents' carpark partly to G/F and partly to 1/F, the location and headroom of other residential ancillary uses originally accommodated in the podium (including the clubhouse facilities, covered landscape areas, M&E zones, etc.) have been reshuffled so that the Proposed Scheme will have a total increase in BH by not more than 6.5m. When compared with the Approved GBP

Scheme, the Proposed Scheme has also adopted the same floor-to-floor height for typical residential floors (i.e. 3.3m) and top three floors (i.e. 3.5m).

### **5.3 Magnitude of Increase in Building Height is Minor and Overall Building Height still Compatible to Surrounding Developments**

5.3.1 The Application Site is subject to a maximum BH restriction of 70mPD under the OZP. The proposed relaxation of BH by 6.5m (or about 9.3%) is minor in nature. There are similar approved planning applications for minor relaxation of BH restriction in the surrounding area (including Application Nos. A/I-TCE/3, A/I-TCE/4, A/I-TCE/5 and A/I-TCE/6), which have a magnitude of increase in BH ranging from about 3.2% to about 50%. The magnitude of increase under the subject planning application (i.e. about 9.3%) is considered comparable to these similar approved planning applications and by no means considered excessive.

5.3.2 Besides, to the southeast of the Application Site, there are various high-rise "Residential (Group A)" zones with a maximum BH restriction ranging from 95mPD to 140mPD. Therefore, by slightly relaxing the maximum BH restriction of the Application Site to 76.5mPD, the proposed development is still compatible with these surrounding developments.

### **5.4 In Line with the Urban Design Concept of the Tung Chung Extension Area**

5.4.1 The proposed minor relaxation of BH from 70mPD to 76.5mPD will not jeopardise the stepped BH profile under the subject OZP. The BH of the Tung Chung Extension Area will still be able to gradually step down from the mountain backdrop in the south (i.e. high-rise "R(A)" zones of 95-140mPD) to the waterfront area to the north (i.e. various "R(B)" zones of 70mPD and the Proposed Development of 76.5mPD).

5.4.2 Also, same as the Approved GBP Scheme, the Proposed Scheme has retained two 10m-wide NBAs along the north-eastern and south-western boundaries of the site to serve as breezeways / view corridors in accordance with the urban design concept plan for the Tung Chung Extension Area.

## **5.5 Opportunity has been Taken to Include Additional Design Measures as Compared with the Approved GBP Scheme**

5.5.1 The Applicant has taken the opportunity to include additional design measures in the Proposed Scheme. While the Proposed Scheme is largely the same as the Approved GBP Scheme in terms of the overall layout of the proposed residential development, the Proposed Scheme has taken the opportunity to include (i) additional podium setback of about 2.3m ~ 3.75m along the north-western boundary from the promenade (about 6m ~ 7.45m) and (ii) permeable design by providing two void areas (each about 6m in width and 3.5m in height) on 2/F of the Proposed Scheme (**see Figures 3.6 to 3.9**). Such design measures can further enhance the permeability of the proposed development.

## **5.6 No Significant Changes in Visual and Air Ventilation Aspects**

5.6.1 According to the visual and air ventilation review as provided in **Section 4**, it is concluded that the overall visual impact induced by the Proposed Scheme due to the minor relaxation of BH by 6.5m (or about 9.3%) is considered negligible as compared to the baseline case (i.e. the Approved GBP Scheme). With the two NBAs maintained in the Proposed Scheme, it is also anticipated that the overall air ventilation of the Tung Chung Extension Area would not be affected.

## **5.7 No Other Technical Impacts Anticipated**

5.7.1 Since the Proposed Scheme conforms to the planning intention, land uses and plot ratio restriction of the OZP, and all development parameters (e.g. GFA, no. of units, and car parking provision) proposed are basically the same as the Approved GBP Scheme, 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 "R(B)3" zone on the Approved Tung Chung Extension Area OZP No. S/I-TCE/2 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 is for the incorporation of the aboveground carparks only with no major change to the floor-to-floor heights as in the Approved GBP Scheme;
- the proposed magnitude of increase in building height is minor with magnitude of increase comparable to other similar approved planning applications with minor relaxation of building height restriction;
- the Proposed Scheme, with a minor increase in BH, is still in line with the urban design concept for the Tung Chung Extension Area, with stepped building height profile and air ventilation / view corridor preserved;
- the Proposed Scheme has included additional design enhancement measures as compared with the Approved GBP Scheme;
- the Proposed Scheme has no significant change in visual and air ventilation aspects; and
- no other technical impacts are anticipated, as the Proposed Scheme conforms to the planning intension, land uses and plot ratio restriction of the OZP, and all other development parameters remain the same as per the Approved GBP Scheme.

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

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**Attachment 1**

**Extract of the Notes and Explanatory Statement  
of the Approved Tung Chung Extension Area**

**OZP No. S/I-TCE/2**

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RESIDENTIAL (GROUP B)

Column 1 Uses always permitted	Column 2 Uses that may be permitted with or without conditions on application to the Town Planning Board
Flat Government Use (Police Reporting Centre, Post Office only) House Library Residential Institution School (in free-standing purpose- designed building only) Utility Installation for Private Project	Eating Place Educational Institution Government Refuse Collection Point Government Use (not elsewhere specified) Hospital Hotel Institutional Use (not elsewhere specified) Market Mass Transit Railway Vent Shaft and/or Other Structure above Ground Level other than Entrances Off-course Betting Centre Office Petrol Filling Station Place of Entertainment Place of Recreation, Sports or Culture Private Club Public Clinic Public Convenience Public Transport Terminus or Station Public Utility Installation Public Vehicle Park (excluding container vehicle) Recyclable Collection Centre Religious Institution School (not elsewhere specified) Shop and Services Social Welfare Facility Training Centre

(Please see next page)

RESIDENTIAL (GROUP B) (Cont'd)

Column 1 Uses always permitted	Column 2 Uses that may be permitted with or without conditions on application to the Town Planning Board
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On land designated “R(B)1”, “R(B)2”, “R(B)4” and “R(B)5”, the following uses are always permitted (a) on the lowest three floors of a building, taken to include basements; or (b) in the purpose-designed non-residential portion of an existing building, both excluding floors containing wholly or mainly car parking, loading/unloading bays and/or plant room:

Eating Place  
School (Kindergarten only)  
Shop and Services

Planning Intention

This zone is intended primarily for medium-density residential developments where commercial uses serving the residential neighbourhood may be permitted with or without application to the Town Planning Board.

Remarks

- (a) On land designated “R(B)1” to “R(B)6”, no new development, or addition, alteration and/or modification to or redevelopment of an existing building shall result in a total development and/or redevelopment in excess of a maximum plot ratio specified below, or the plot ratio of the existing building, whichever is the greater:

<u>Sub-area</u>	<u>Maximum Plot Ratio</u>
R(B)1	3.9
R(B)2	3.8
R(B)3	3.5
R(B)4	3.4
R(B)5	2.8
R(B)6	2.5

(Please see next page)

RESIDENTIAL (GROUP B) (Cont'd)

Remarks (Cont'd)

- (b) No new development, or addition, alteration and/or modification to or redevelopment of an existing building shall result in a total development and/or redevelopment in excess of the maximum building height in terms of metres above Principal Datum as stipulated on the Plan, or the height of the existing building, whichever is the greater.
- (c) In determining the relevant maximum plot ratio for the purposes of paragraph (a) above, any floor space that is constructed or intended for use solely as car park, loading/unloading bay, plant room and caretaker's office, or caretaker's quarters and recreational facilities for the use and benefit of all the owners or occupiers of the domestic building or domestic part of the building, provided such uses and facilities are ancillary and directly related to the development or redevelopment, may be disregarded.
- (d) Based on the individual merits of a development or redevelopment proposal, minor relaxation of the plot ratio and/or building height restrictions stated in paragraphs (a) and (b) above may be considered by the Town Planning Board on application under section 16 of the Town Planning Ordinance.

development or redevelopment, may be disregarded. Any floor space that is constructed or intended for use solely as GIC facilities as required by the Government may be disregarded.

- 8.2.5 On land designated “R(A)3”, any floor space that is constructed or intended for use solely as public transport terminus as required by the Government may be disregarded.
- 8.2.6 To provide flexibility for innovative design adapted to the characteristics of particular sites, minor relaxation of the PR and/or BH restrictions may be considered by the Board through the planning permission system. Each proposal will be considered on its individual planning merits.

8.3 “Residential (Group B)” (“R(B)”) : Total Area 17.00 ha

- 8.3.1 This zone is intended primarily for medium-density residential developments where commercial uses serving the residential neighbourhood may be permitted with or without application to the Board.
- 8.3.2 Areas 106, 110, 125 to 127, 139, 141 and 142 are zoned “R(B)1” to “R(B)6”. Development and redevelopment within “R(B)1”, “R(B)2”, “R(B)3”, “R(B)4”, “R(B)5” and “R(B)6” zones are subject to maximum PRs of 3.9, 3.8, 3.5, 3.4, 2.8 and 2.5 respectively and maximum BHs ranging from 45mPD to 70mPD. A kindergarten each with GFA of 642m<sup>2</sup> consisting of not less than 6 classrooms shall be provided in Areas 139 and 142. For sites located along the Linear Parks, pedestrian corridors and/or the waterfront promenade, shop and services and eating place uses are encouraged to be provided along the site boundary fronting the pedestrian corridor / open space to encourage street life, and to provide local commercial uses serving the residents. As such, limited commercial uses are always permitted on the lowest three floors of a building or in the purpose-designed non-residential portion of an existing building within the “R(B)1”, “R(B)2”, “R(B)4” and “R(B)5” zones.
- 8.3.3 In determining the relevant maximum PR, any floor space that is constructed or intended for use solely as car park, loading/unloading bay, plant room and caretaker’s office, or caretaker’s quarters and recreational facilities for the use and benefit of all the owners or occupiers of the domestic building or domestic part of the building, provided such uses and facilities are ancillary and directly related to the development or redevelopment, may be disregarded.
- 8.3.4 To provide flexibility for innovative design adapted to the characteristics of particular sites, minor relaxation of the PR and/or BH restrictions may be considered by the Board through the planning permission system. Each proposal will be considered on its individual planning merits.

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**Appendix A –**

**Previous Responses to Departmental Comments**

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(Previously submitted under Further Information dated  
29.1.2026, 20.3.2026 and 28.4.2026)

*(All departmental comments have been addressed and incorporated into the  
consolidated planning statement where appropriate)*

**llewelyn  
davies**

ARCHITECTS PLANNERS DESIGNERS  
Llewelyn-Davies Hong Kong Ltd

29 January 2026

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

**By Fax and Email  
(2877 0245)**

Dear Sir

**Proposed Residential Development at Area 106B, Tung Chung, TCTL No. 55  
Section 16 Planning Application for Proposed Minor Relaxation of Maximum Building  
Height Restriction for Permitted Flat Use in "Residential (Group B) 3" Zone  
(Application No. A/I-TCE/7)**

We refer to the captioned application submitted to the Town Planning Board (the Board) on 9 January 2026 and the clarification submitted to the Board on 21 January 2026.

In responses to the comments received from the District Planning Office/ Sai Kung & Islands in January 2026, we would like to provide herewith a Response-to-Comments (RtoC) table for the Board's consideration.

Please note that the enclosed RtoC serves only for the purpose of clarification with no change to the major development parameters of the Proposed Scheme as indicated in the submission on 9 January 2026.

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

Yours faithfully  
for Llewelyn-Davies Hong Kong Ltd



Winnie Wu  
Planning Director

WW/AK/el  
Encl

**Responses to Departmental Comments**

	Departmental Comments	Responses to Comments
1.	<b>Comments of Sai Kung &amp; Islands District Planning Office, Planning Department</b>	
1.1	It seems that the extent of M&E at G/F and 1/F of the Proposed Scheme is excessive, as compared with the Approved GBP Scheme. Justifications should be provided for the increase in M&E extent and their proposed locations.	<p><b><u>Extent of M&amp;E Formulated Based on Further Detailed Design</u></b></p> <p>Further to the approval of building plans by the Buildings Department (BD) in September 2025 (i.e. the Approved GBP Scheme), the Applicant has proceeded to further detailed design of the development, including the detailed design and arrangement of M&amp;E provisions, which results in the changes in the extent of M&amp;E plant rooms as reflected in the Proposed Scheme.</p> <p>In response to Government's policy of popularisation of electric vehicles (EVs), new buildings are mandated to be EV-ready and provision of sufficient M&amp;E facilities is the necessary infrastructure for installation of EV charging facilities. For instance, pursuant to the latest requirements as stipulated in PNAP APP-2 issued by BD, the 2 storeys of above ground carpark have been designed to incorporate the installation of medium EV chargers (with output power of not less than 7kW, which is a faster charging standard) to support simultaneous charging at all parking spaces for private cars and motorcycles. Each EV charger will be equipped with the requisite EV charging-enabling facilities. Such latest requirements will have direct bearing on the spatial requirements of the carpark design as well as the supporting electrical facilities. Therefore, with detailed M&amp;E provision taken into account, the extent and scale of M&amp;E is by no means excessive and is provided in accordance with the prevailing requirements as prescribed under BD's PNAP APP-2.</p>

	Departmental Comments	Responses to Comments
1.1 (Con't)		<p>Besides, as substantiated under the Planning Statement submitted to the Town Planning Board on 9.1.2026, given that the ground level would need to accommodate various other uses (e.g. driveway / uncovered EVA, loading / unloading bay, vehicular entrance area, residents' lift lobbies, M&amp;E facilities etc.), there is not sufficient space to co-locate a total of 212 nos. private carparking spaces using ground level only. Hence, 2 levels of aboveground carpark is proposed. As elaborated above, apart from supporting various building services for the proposed residential development, the M&amp;E facilities are also provided to enable EV charging facilities of faster charging standard for the carparking spaces. Accordingly, the relevant M&amp;E facilities are split into 2 levels at G/F and 1/F adjoining the carparking spaces.</p> <p><b><u>Location and Headroom of Proposed M&amp;E is Optimal</u></b></p> <p>For clarity sake, an area previously annotated as M&amp;E adjoining the northeastern portion of G/F carparking space should be more specifically referred to as Refuse Storage &amp; Material Recovery Chamber, which requires higher headroom requirement. Please refer to Indicative G/F and Section Plans submitted to the Town Planning Board on 21 January 2026. Besides, please also be clarified that portion of the M&amp;E spaces underneath Tower 1 is actually located at high-level (i.e. 14.90mPD) immediately underneath the structural transfer plate of the said residential tower (please refer to the Indicative 1/F and Section Plans submitted to the Town Planning Board on 21 January 2026). Such M&amp;E spaces located at high level is for accommodating the transfer zone of drainage pipeworks leading from the residential floors above, in which the high level space also provides safe maintenance access and working environment for workers to such building services.</p> <p>Please be reiterated that it is not the Applicant's intention to enlarge the extent of M&amp;E facilities in exchange for a higher building height. The proposed minor relaxation of building height restriction is based on ongoing detailed design and various technical considerations.</p>

	<b>Departmental Comments</b>	<b>Responses to Comments</b>
1.2	<p>Under the Approved GBP Scheme, the clubhouse is of 2 storeys which is detached from residential towers and facing Wui Tung Street. Under the Proposed Scheme, the clubhouse facilities are designated in 3 storeys (i.e. 1 storey detached from residential towers above carpark podium facing Wui Tung Street; and 2 storeys underneath residential towers facing the promenade). The 2 storeys of clubhouse underneath residential towers will lead to increase in maximum building height. Justifications should be provided for such arrangement.</p>	<p>Under the Approved GBP Scheme (with basement carpark), the clubhouse facilities consisted of 2 storeys and were designed as detached structures above the podium level. With the carpark facilities now proposed to be incorporated aboveground, it is necessary to review the spatial planning of all the facilities accommodated at the podium, including the clubhouse facilities. Hypothetically, if the clubhouse facilities remain to be detached structures accommodated above the podium level, after incorporating the aboveground carpark, the overall height of the podium facing Wui Tung Street will become overly excessive, reaching a height of about 20m (i.e. at least 9m for 2 storeys of above ground carpark + at least 10m for 2 storeys of clubhouse further above + raised level of about 1m from mean street level). The resultant building bulk of the podium is considered excessive which would significantly reduce the visual and wind permeability at pedestrian level along Wui Tung Street.</p> <p>Therefore, under the current Proposed Scheme, with 1 storey of clubhouse facilities co-locating with carpark on 1/F, and with the remaining clubhouse facilities evenly distributing across two frontages on 2/F (at the podium facing Wui Tung Street and at the podium near the two residential lift lobbies facing the promenade), could help break up the building bulk of the podium level facing Wui Tung Street (i.e. podium height reduced from 20m measured from mean street level as assumed under the hypothetical scenario discussed above, to 15m measured from mean street level as now proposed under the current Proposed Scheme).</p> <p>Besides, such clubhouse arrangement under the current Proposed Scheme could also allow for a more permeable podium design through the incorporation of voids underneath the residential towers facing the promenade. As a result, the Proposed Scheme is able to increase the efficacy in cross-ventilation and visual permeability at lower levels for the benefit of pedestrians.</p>

	<b>Departmental Comments</b>	<b>Responses to Comments</b>
1.3	Please justify the adopted floor-to-floor height of 3.3m and 3.5m for the Proposed Scheme.	<p>Please note that the residential floor-to-floor height of the Proposed Scheme does not exceed that of the Approved GBP Scheme (i.e. 3.3m and 3.5m). Besides, when compared to the Approved GBP Scheme, the number of residential storeys in the Proposed Scheme has been reduced from 18 to 17 as a means of limiting the extent of additional building height, while still ensuring effective use of scarce land resources.</p> <p>Furthermore, the proposed residential floor-to-floor height of 3.5m will be able to provide better sunlight penetration and air ventilation to the indoor living environment of each residential unit, which is in line with the Government's policy of promoting better indoor living environment.</p>
1.4	Please clarify if there is any landscape provision at the two non-building areas (NBAs) running alongside the eastern and western edges of the Application Site.	<p>In compliance with the relevant Lease conditions, the Applicant will be responsible for the site formation of the two NBAs and will hand over to the Government. The Applicant will also need to provide landscaping provision within the two NBAs, subject to further liaison and agreement with the relevant government departments at detailed design stage, including the materials used. In fact, under the recently submitted GBP, the Applicant has already taken the initiative to indicate preliminary design concept/ landscaping provision within the two NBAs for consideration by the relevant government departments.</p>

**llewelyn  
davies**

ARCHITECTS PLANNERS DESIGNERS  
Llewelyn-Davies Hong Kong Ltd

20 March 2026

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

***By Email and Hand***

Dear Sir

**Proposed Residential Development at Area 106B, Tung Chung, TCTL No. 55  
Section 16 Planning Application for Proposed Minor Relaxation of Maximum Building  
Height Restriction for Permitted Flat Use in "Residential (Group B) 3" Zone  
(Application No. AI-TCE/7)**

We refer to the captioned application submitted to the Town Planning Board (the Board) on 9 January 2026, the clarification submitted to the Board on 21 January 2026, the Further Information submitted to the Board on 29 January 2026 and the departmental comments received from the District Planning Office/ Sai Kung & Islands (DPO/SKIs) in February 2026

Further to our request for deferment on 27 February 2026, we would like to reactivate the captioned application by submitting herewith 4 copies of the Further Information comprising an Response-to-Comments (RtoC) table in **Attachment 1** as well as revised set of drawings, development schedule and supplementary drawings for the Proposed Scheme in **Attachments 2 and 3** of the current submission respectively for the Board's consideration.

In response to the comments from DPO/SKIs regarding the proposed site formation level, taking into account the impact of potential flood risk and the road level of Wui Tung Street, there is scope to reduce the site formation level from 7.2mPD to 6.8mPD (-0.4m). Accordingly, **the maximum building height of the Proposed Scheme is reduced from 76.9mPD to 76.5mPD (-0.4m)**. Apart from the slight reduction in maximum building height and the corresponding adjustments in levels for various floors, there is no change to the layout of the Proposed Scheme. The revised key development parameters and relevant supplementary drawings are in **Attachments 2 and 3** of the current submission.

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

Yours faithfully  
for Llewelyn-Davies Hong Kong Ltd



Winnie Wu  
Planning Director

WW/AK/el  
Encl

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**Attachment 1**

**Responses to Comments Table**

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## **Table of Contents**

### **Responses to Departmental Comments**

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	Departmental Comments	Responses to Comments
1.	<b>Comments of District Planning Office/ Sai Kung &amp; Islands, Planning Department</b>	
1.1	<p><u>General Comments</u></p> <p>According to the Notes of the approved Tung Chung Extension Area Outline Zoning Plan No. S/I-TCE/2 (the OZP), minor relaxation of Building Height (BH) restrictions of "R(B)3" zone may be considered by the Town Planning Board on application under section 16 of the Town Planning Ordinance <b>based on a development proposal with strong individual merits for the development proposal.</b> The submissions indicate that the application for relaxing BH restrictions involves not only converting a single basement parking level into a two-storey above-ground parking podium but also includes alterations to the site formation level. This allows for a more relaxed floor-to-floor height between 3.3m and 3.5m for domestic storeys, a 2.3m transfer plate, as well as additional E&amp;M facilities within the parking podium. While the recent government initiative from DEVB in relation to above-ground carpark podiums may serve as justification for the resulting height from the conversion, the justifications related to the additional parking floor, layout changes (such as non-domestic uses like lift lobbies and a clubhouse) and extra E&amp;M provisions to support residential development and EV charging are weak and lack sufficient design merits.</p>	<p>Noted. Please refer to the revised set of drawings, development schedule and supplementary drawings for the Proposed Scheme, which further elaborate on the design merits and justifications of the Proposed Scheme <b>(see Attachments 2 and 3).</b></p>
1.2	<p>In addition to providing strong justifications beyond those related to converting the basement carpark to an aboveground with individual planning merits for the additional changes as stated above, the applicant is suggested to review the scheme to strengthen its individual merits and planning gains. This could involve exploring the potential for further site coverage reduction by setting the podium back from the NBAs or further setback from the waterfront possibility for an enhanced greening ratio, and etc.</p>	<p>Please note that while there is no setback requirement imposed under the OZP, additional podium setback of about 6m to 7.45m along the north-western boundary facing the waterfront promenade has been incorporated in the Proposed Scheme to help reduce the visual bulk. Besides, as required under lease, there are two strips of non-building area (NBA) designated along the north-eastern and south-western boundary of the Application Site. The Applicant has taken the initiative to create a further setback of about 7.3m at G/F level with high headroom abutting the north-eastern NBA. The further setback from NBA can enhance the openness through the Application Site between waterfront promenade and Wui Tung Street.</p>

	<b>Departmental Comments</b>	<b>Responses to Comments</b>
1.2 (Con't)		<p>For greenery provision, in accordance with the requirement of the Sustainable Building Design Guidelines (PNAP APP-152), the overall minimum site coverage of greenery required for the entire Application Site is 20%.</p> <p>Given that the two strips of non-building area (NBA) along the northeastern and southwestern boundary will be surrendered back to the Government, in order not to reduce the overall greenery provision for the Application Site, the Applicant has distributed all the proposed greenery within the development site area (i.e. area outside NBAs). The greenery provision within the development site area is therefore able to achieve a coverage of not less than 23%. Besides, according to the lease, the Applicant will also need to provide landscaping provision within the two NBAs, subject to liaison and agreement with relevant government departments at detailed design stage. In turn, the two strips of NBAs might be able to provide additional greenery provision on top of those within the development site area, which will further enhance the streetscape of the Application Site.</p> <p>Please also refer to the revised set of drawings, development schedule and supplementary drawings for the Proposed Scheme in <b>Attachments 2 and 3</b> for details.</p>

	<b>Departmental Comments</b>	<b>Responses to Comments</b>
<p>1.3</p> <p>1.4</p>	<p><u>Specific Comments</u></p> <p>The justifications provided in the Supplementary Planning Statement for the application for minor relaxation of building height from 70mPD to 76.9mPD at the site are generally based on a comparison with an approved GBP that includes a basement carpark. It is unjustifiable to consider the proposed BH relaxation is acceptable due to its largely conformation of the approved GBP as this scheme is just one of many development options for the proposed residential development. Therefore, the applicant should strengthen the individual merits and planning gains associated with the requested minor BH relaxation for the Site.</p> <p>Please provide compelling justifications for the 50% increase in no. of storeys for the proposed car parking provision, given that this scheme maintains largely the same no. of parking spaces (i.e. a total of 202 car parking spaces).</p>	<p>Noted. The revised set of drawings, development schedule and supplementary drawings for the Proposed Scheme have been prepared in <b>Attachments 2 and 3</b> to further depict the design merits and justifications of the Proposed Scheme with minor relaxation of BH height restriction for incorporation of a 2-storey above ground carpark, without comparing with the Approved GBP Scheme with basement carpark design.</p> <p>It should also be noted that, upon further review on site formation level in relation to flood level and abutting street level, the site formation level has been reduced by 0.4m. The maximum BH for the Proposed Scheme has also been reduced to 76.5mPD accordingly.</p> <p>Please note that, with basement carpark design, apart from avoiding encroachment into the two NBAs and unexcavated areas reserved along the site boundaries, the area available for the floor plate of carparking area could cover majority of the Application Site. However, for the Proposed Scheme with above ground carpark design, the area available for carpark is constrained by other provisions above ground, such as the necessary EVA arrangement for firefighting, ingress/egress points, etc. These facilities would not be provided at basement level. As a result, it is not feasible to accommodate all of the 202 nos. of carparking spaces on a single floor (i.e. G/F). Therefore, some of the required carparking spaces would have to be accommodated on another floor (i.e. 1/F). Accordingly, a 2-storey above ground carpark is required for the Proposed Scheme.</p> <p>Please also refer to the revised set of drawings, development schedule and supplementary drawings for the Proposed Scheme in <b>Attachments 2 and 3</b> for details.</p>

	<b>Departmental Comments</b>	<b>Responses to Comments</b>
1.5	In view of the increase in the building bulk by converting the car parking provisions from the basement to aboveground podiums, please clarify whether the proposed site coverage and floor-to-floor heights for the residential and podium floors represent the most sensible development option. If so, please provide justifications explaining how the proposed site coverage would result in a less intrusive building bulk for the proposed residential development at the site.	<p>Please note that the Applicant has already paid his best effort to reduce site coverage with justifications provided for the floor-to-floor height as well as layout arrangements to minimise the building bulk.</p> <p>Please also refer to the revised set of drawings, development schedule and supplementary drawings for the Proposed Scheme in <b>Attachments 2 and 3</b> for details.</p>
1.6	The existing site formation level of the site is about +5.4mPD to +5.7mPD. According to the submitted floor plans, the proposed site formation level at G/F (i.e. +7.2mPD) exceeds the existing site formation level for the residential development. Please clarify how the proposed site formation level of +7.2mPD (including the site formation levels for the carparking floor and EVA/driveway) is technically justified from an engineering perspective.	<p>The Application Site is located at a waterfront location. In view of the extreme weather condition Hong Kong experienced in the recent years, minimising flood risk is one of the major concerns when formulating the Proposed Scheme. According to the 50-year storm with climate change projected to the end of 21<sup>st</sup> Century, the flood level of the Tung Chung area is about 5.99mPD (based on the nearest Shek Pik Tide gauge). To also tie in with the street level of Wui Tung Street at 6.18mPD, which is also the ingress/egress point of the Application Site, a reasonable site formation level of 6.8mPD is proposed.</p> <p>As compared with the original scheme submitted to the Town Planning Board in January 2026, the site formation level has been reduced from 7.2mPD to 6.8mPD.</p> <p>Please also refer to the revised set of drawings, development schedule and supplementary drawings for the Proposed Scheme in <b>Attachments 2 and 3</b> for details.</p>
1.7	Please clarify on whether the proposed BH for the residential development would be subject to any aircraft noise impact.	Please refer to our responses on Items 2.3 and 2.4 of this RtoC table below.

	<b>Departmental Comments</b>	<b>Responses to Comments</b>
<b>2.</b>	<b>Comments of Civil Aviation Department</b>	
2.1	<p><u>Airport Height Restriction and Lighting</u></p> <p>AHR must be strictly observed at all times. No part of any structures and equipment used during construction or for maintenance after the completion of the construction works shall exceed the AHR limits; and</p>	<p>The Applicant will take into account the airport height restriction (AHR) and ensure that no part of the building and associated construction machinery will exceed the ARH limits.</p>
2.2	<p>All lights, including those installed for construction works, shall not form a source of glare or in any way affect pilots in flight and air traffic controllers in the Air Traffic Control Towers.</p>	<p>All lights of the Proposed Development, including those installed for construction works, or for maintenance after the construction works, would not be projected in a way that form a source of glare or in any way affecting pilots in flight and air traffic control towers at all time.</p>
2.3	<p><u>Aircraft / Helicopter Noise</u></p> <p>In view that the subject site is located in close proximity to the Hong Kong International Airport (HKIA) and helicopter holding areas/flying routes, it is expected that the proposed development will be subject to aircraft/helicopter noise disturbances, even though the site is situated outside the Noise Exposure Forecast (NEF) 25 contour of the HKIA. Such potential noise disturbance is especially pronounced during the night-time period when the ambient background noise levels are low. In fact, we are aware of aircraft noise complaints lodged by the residents in Tung Chung from time to time.</p>	<p>According to the approved EIA report for Expansion of Hong Kong International Airport into a Three-Runway System (Ref.: AEIAR-185/2014), the Application Site is located outside the Noise Exposure Forecast (NEF) 25 Contour of the Hong Kong International Airport (HKIA). On the other hand, it is also noted that the Application Site is located in close proximity to the HKIA and helicopter holding areas/flying routes, and therefore may be subject to aircraft/ helicopter noise disturbances.</p>

	<b>Departmental Comments</b>	<b>Responses to Comments</b>
2.4	It is noted that the enclosed Planning Statement does not include any description or environmental assessment related to aircraft noise impact. It is therefore suggested that the expected aircraft noise situation should be reflected in the aforesaid document. In this connection, implementation of appropriate noise mitigation measures (e.g. use of acoustic insulation, etc.) should be considered in order to minimize the aircraft noise impact on future occupants. Also, we suggest that perspective buyers or future residents should be duly alerted of the potential aircraft noise impact.	Under such circumstances, better insulation would be considered for the proposed residential development at detailed design stage subject to further review and study. In future, the perspective buyers or future residents will also be duly informed of such potential noise impact, e.g. via sales brochure.
<b>3.</b>	<b>Comments of Transport Department</b>	
3.1	Please confirm that there is (i) no change in GFA together with no change in flat units and size; (ii) no reduction of parking spaces; and (iii) no change in run-in/out compared to the approved GBP scheme.	When compared with the Approved GBP Scheme, the Proposed Scheme has (i) no change in GFA; (ii) no change in no. of units and average flat size; (iii) no reduction of parking spaces; and (iv) no change in run-in/out.
<b>4.</b>	<b>Comments of Drainage Services Department</b>	
4.1	Please be reminded that no structure including temporary or movable should be erected on top or within the Drainage Reserve Area. This Division shall have free access at all time to the Drainage Reserve Area (including headroom) for the purpose of laying, repairing and maintaining drains, sewers and all other services across through or under it which may require.	Noted.

	<b>Departmental Comments</b>	<b>Responses to Comments</b>
<b>5.</b>	<b>Comments of Electrical and Mechanical Services Department</b>	
	<u>Town Gas Safety</u>	
5.1	Please be informed that an intermediate pressure underground town gas pipeline may be present in the area.	Noted.
5.2	The project proponent/consultant/works contractor shall liaise with The Hong Kong and China Gas Company Limited in respect of the exact locations of existing or planned gas pipes/gas installations in the vicinity of the works site and any required minimum set back distance away from them during the design and construction stages of development.	Noted.
5.3	The project proponent/consultant/works contractor is required to observe the Electrical and Mechanical Services Department's requirements on the "Avoidance of Damage to Gas Pipes 2nd Edition" for reference. The webpage address is: <a href="https://www.emsd.gov.hk/filemanager/en/content_286/CoP_gas_pipes_2nd_(Eng).pdf">https://www.emsd.gov.hk/filemanager/en/content_286/CoP_gas_pipes_2nd_(Eng).pdf</a>	Noted.
<b>6.</b>	<b>Comments of Fire Services Department</b>	
6.1	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.
6.2	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.

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**Attachment 2**  
**Revised Drawings and**  
**Development Schedule (Changes in Bold and Italic)**

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### **Indicative Development Schedule of the Proposed Scheme**

<b>Development Parameters</b>	<b>Proposed Scheme</b>
<b>Site Area</b>	About 10,648m <sup>2</sup>
<b>Total Domestic GFA</b>	Not more than 37,268m <sup>2</sup>
<b>Total Domestic Plot Ratio</b>	Not more than 3.5
<b>Maximum Building Height (to the main roof)</b>	<b><i>Not more than 76.5mPD</i></b>
<b>No. of Storeys (aboveground)</b>	20 <sup>(1)</sup>
<b>Site Coverage</b> <ul style="list-style-type: none"> <li>• Height not exceeding 15m</li> <li>• Height over 15m</li> </ul>	Not more than 100% Not more than 33.33%
<b>No. of Residential Blocks</b>	2
<b>No. of Units</b>	745
<b>Average Flat Size</b>	About 50 m <sup>2</sup>
<b>Anticipated Population<sup>(2)</sup></b>	About 1,937
<b>Resident's Clubhouse<sup>(3)</sup></b>	Not more than 1,677.06m <sup>2</sup>
<b>Private Open Space</b>	Not less than 1,937m <sup>2</sup>

**Remarks:**

- (1) Including 2 levels of aboveground carparks / E&M, 1 level of landscaped podium and 17 residential floors (excluding transfer plate).
- (2) The anticipated population is assumed to be 2.6 person-per-flat, with reference to Census and Statistics Department's website released in March 2025 ([https://www.censtatd.gov.hk/en/web\\_table.html?id=130-06806](https://www.censtatd.gov.hk/en/web_table.html?id=130-06806)) which shows Islands District average household size in 2024.
- (3) The residents' clubhouse GFA is not more than 4.5% of the domestic GFA and is exempted from plot ratio calculation.



TUNG CHUNG BAY



**Legend**

- Application Site Boundary
- Covered Walkway
- Residential
- Flat Roof Area / Landscape (Covered / Uncovered Area)
- Pool
- EVA / Driveway
- Carpark
- Transfer Plate
- Pink Hatched Blue Stippled Black Area (Under Lease)
- Pink Hatched Blue Area (Under Lease)
- Pink Stippled Black Area (Under Lease)

Rev.	Date
-	23 FEB 2026
Scale	Figure
1:750 [A3]	



TUNG CHUNG BAY



**Legend**

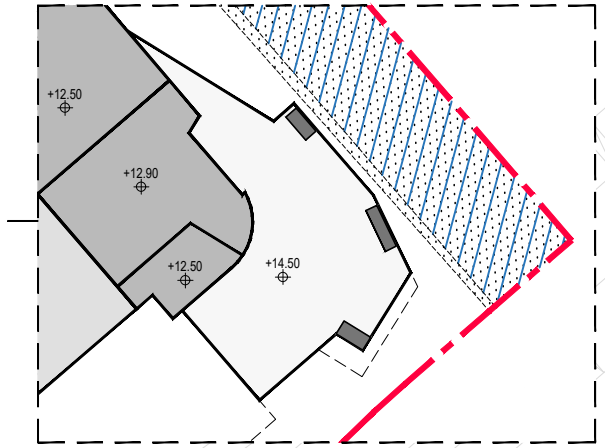
- Application Site Boundary
- Lift Lobby to Residential Towers
- Flat Roof Area / Landscape (Covered / Uncovered Area)
- M&E
- Refuse Storage & Material Recovery Chamber
- EVA / Driveway
- Carpark
- Pink Hatched Blue Stippled Black Area (Under Lease)
- Pink Hatched Blue Area (Under Lease)
- Pink Stippled Black Area (Under Lease)













TUNG CHUNG BAY



Part Plan at High Level



**Legend**

-  Application Site Boundary
-  Lift Lobby to Residential Towers
-  Flat Roof Area / Landscape (Covered / Uncovered Area)
-  Clubhouse
-  M&E
-  M&E Services at High Level
-  Carpark
-  Pink Hatched Blue Stippled Black Area (Under Lease)
-  Pink Hatched Blue Area (Under Lease)
-  Pink Stippled Black Area (Under Lease)

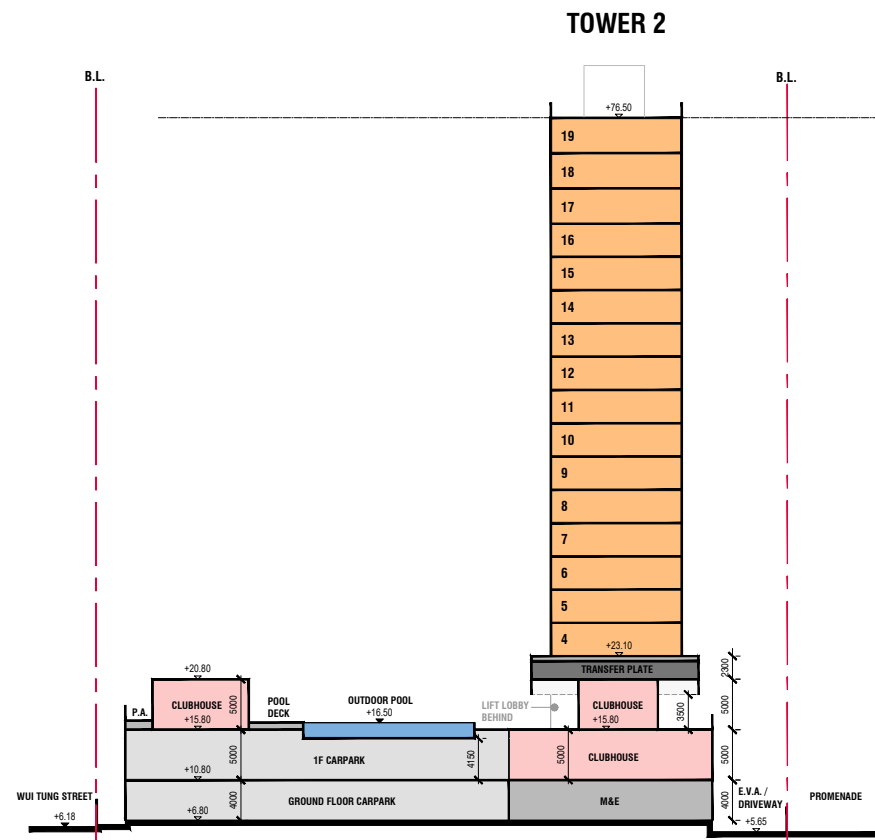


TUNG CHUNG BAY



### Legend

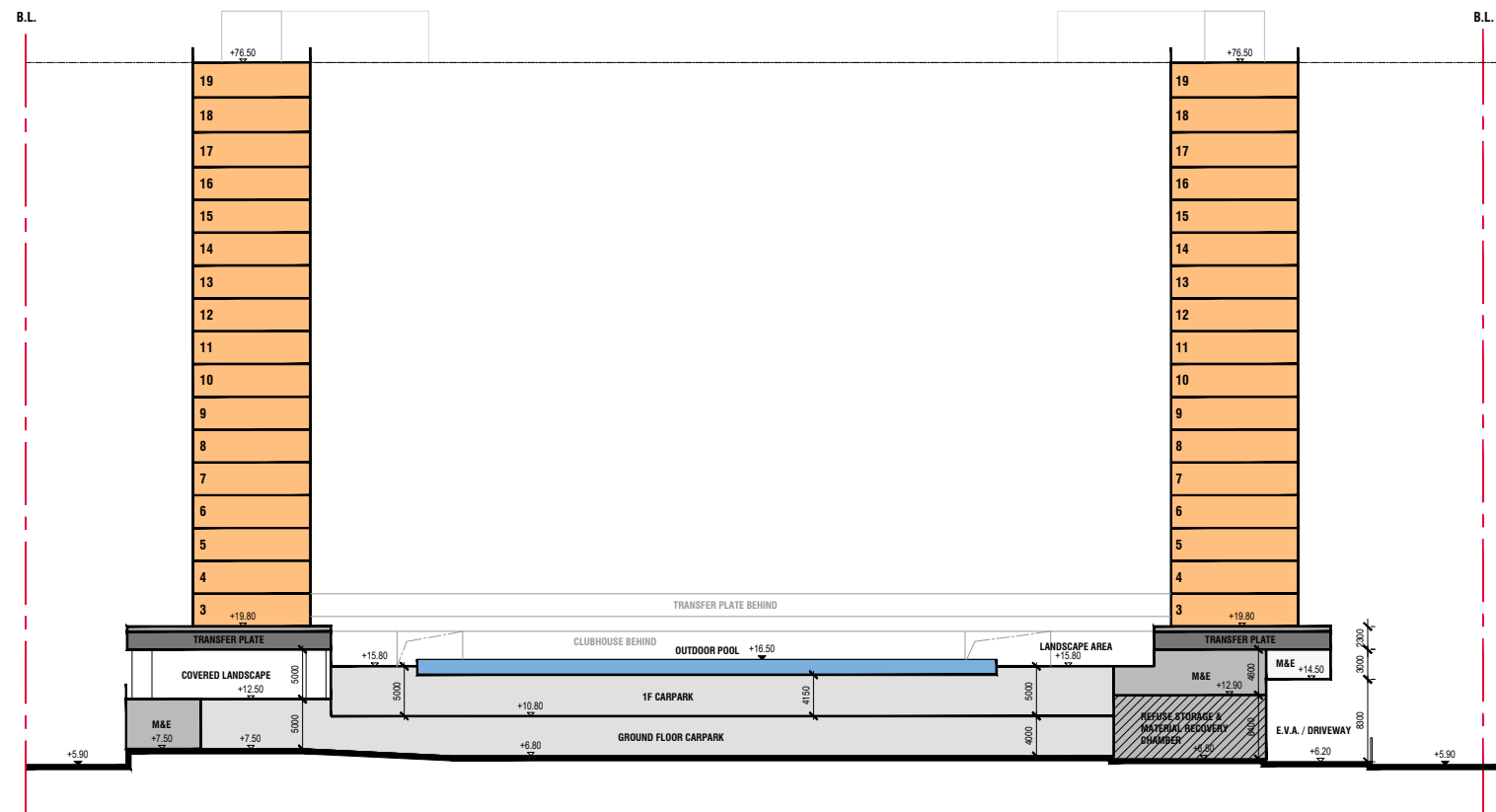
- - - Application Site Boundary
- Covered Walkway
- Lift Lobby to Residential Towers
- Flat Roof Area / Landscape (Covered / Uncovered Area)
- Clubhouse
- Pool
- M&E
- Transfer Plate
- Pink Hatched Blue Stippled Black Area (Under Lease)
- Pink Hatched Blue Area (Under Lease)
- Pink Stippled Black Area (Under Lease)



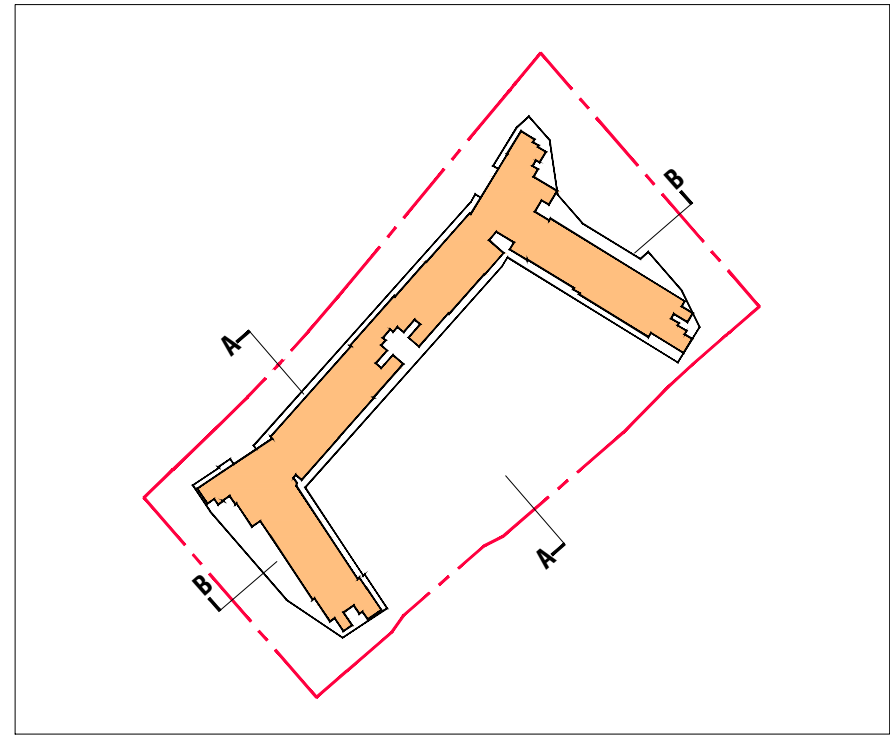
Section A-A

TOWER 2

TOWER 1



Section B-B



KEY PLAN

Legend

- - - Application Site Boundary
- Residential
- Clubhouse
- Pool
- M&E
- M&E Services at High Level
- Refuse Storage & Material Recovery Chamber
- Carpark
- Transfer Plate

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**Attachment 3**  
**Supplementary Drawings**

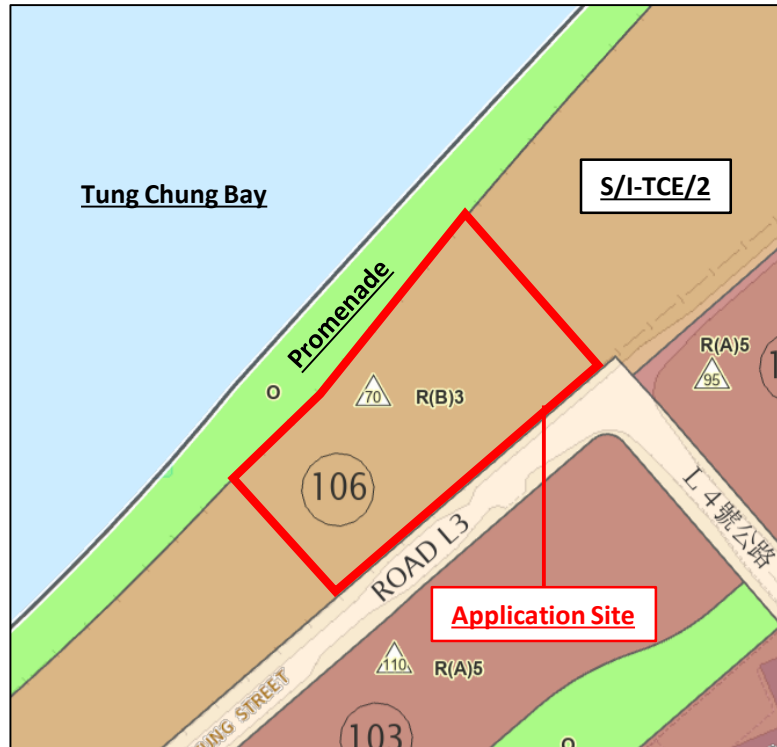
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- 1. DESIGN MERITS OF PROPOSED SCHEME**
- 2. JUSTIFICATIONS FOR CAR PARK ARRANGEMENT**
- 3. JUSTIFICATIONS FOR LAYOUT OF CLUBHOUSE**
- 4. JUSTIFICATIONS FOR SITE LEVELS AND FLOOR HEIGHTS**
- 5. CONCLUSION**

# **1. DESIGN MERITS OF PROPOSED SCHEME**

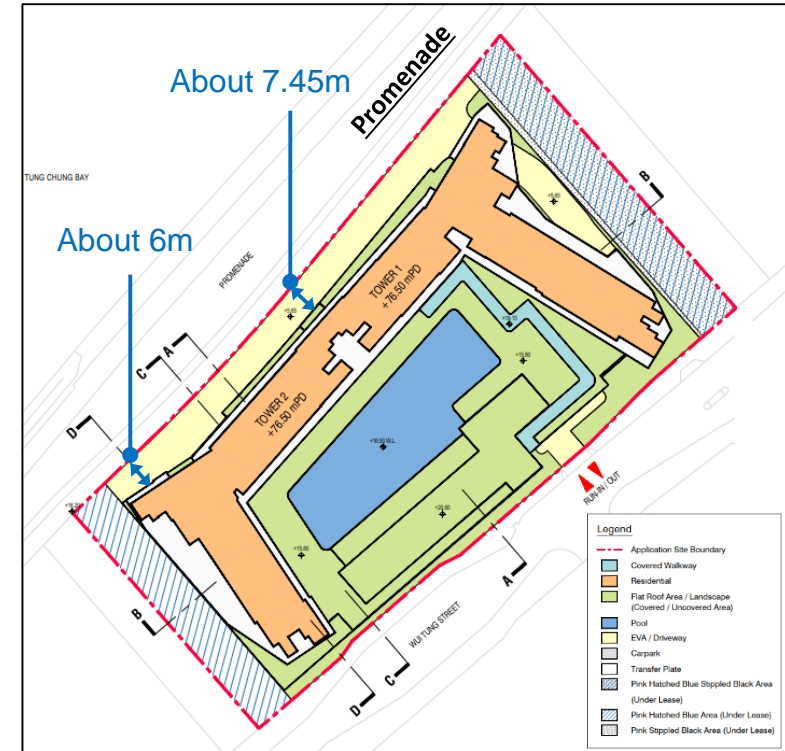
**Figure 1: Provision of Additional Setback from Promenade**

***Under OZP (and Lease)***



- There is no setback requirement from the promenade under OZP (also none under lease).

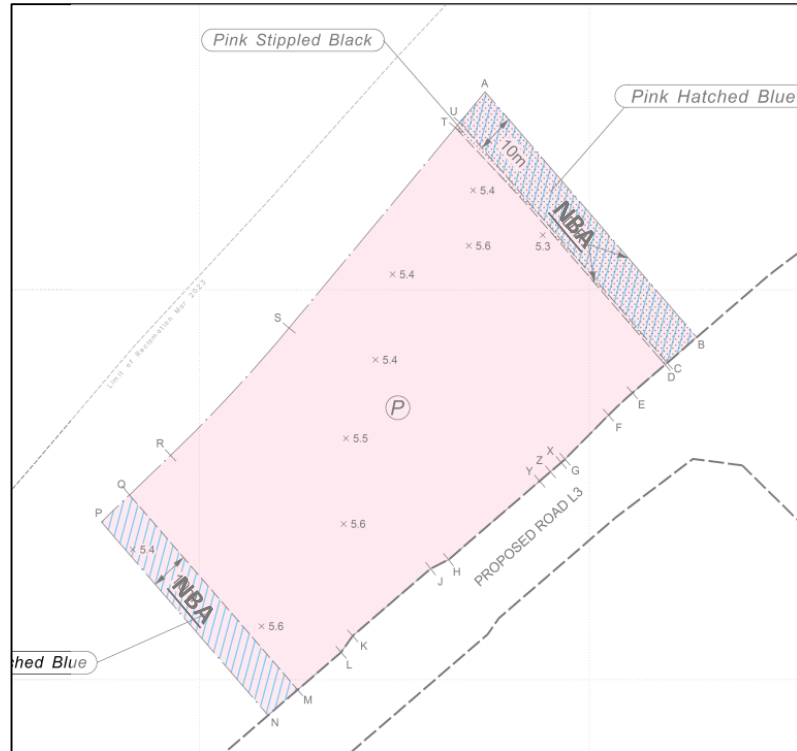
***Proposed Scheme***



- Setback from the promenade is provided along the north-western boundary, which now ranges from about 6m to 7.45m to help reduce visual bulk along the promenade.

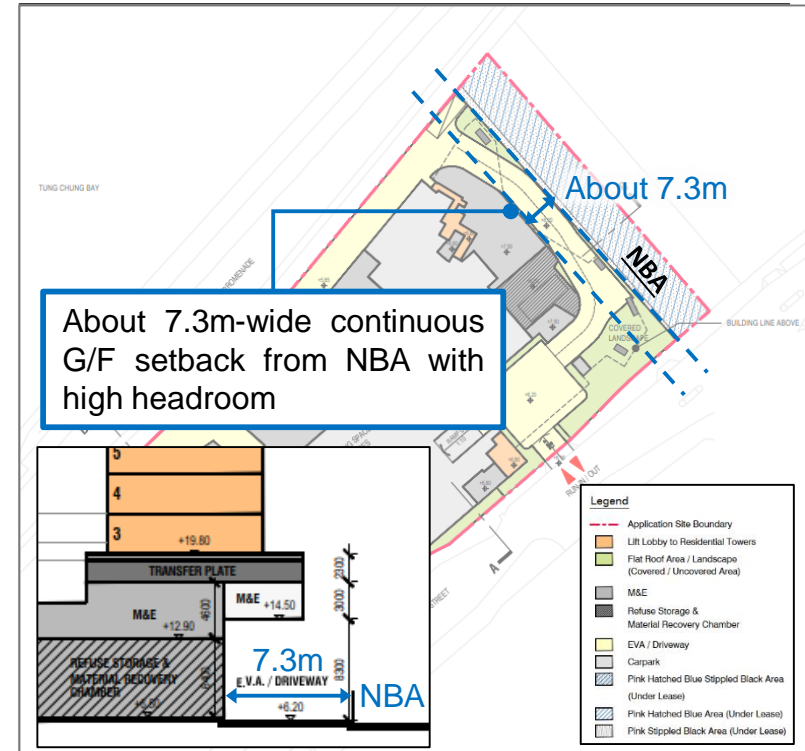
## Figure 2: Provision of Further Setback in Addition to NBA Requirement

### Under Lease



- Under lease, there are two strips of non-building area (NBA), one along the northeastern boundary and one along the southwestern boundary.
- There is [no setback requirement from the NBA](#) under lease.

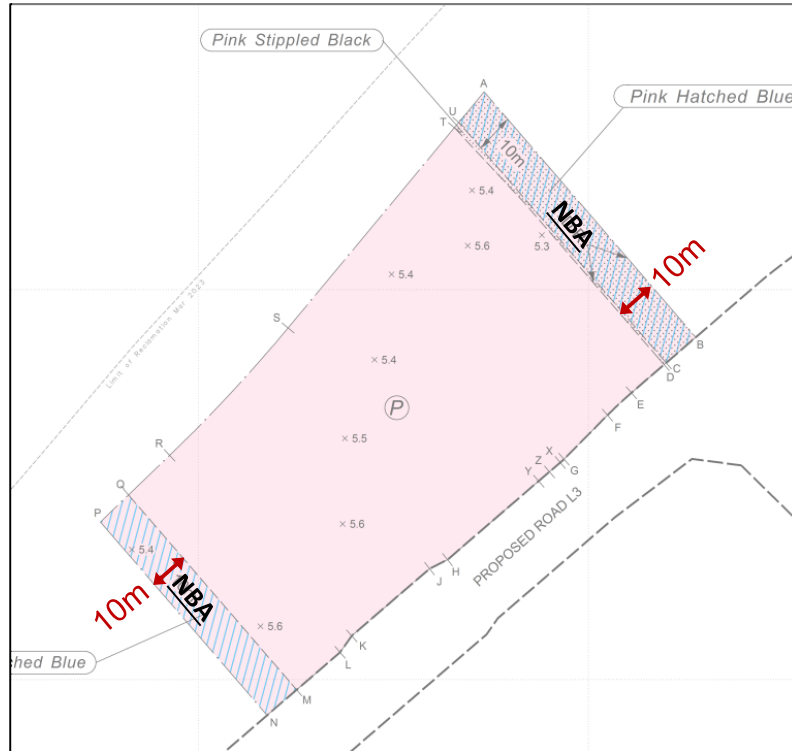
### Proposed Scheme



- Has respected the NBAs.
- A [continuous G/F setback of about 7.3m from the northeastern strip of NBA](#) is provided, which enhances openness facing the NBA.

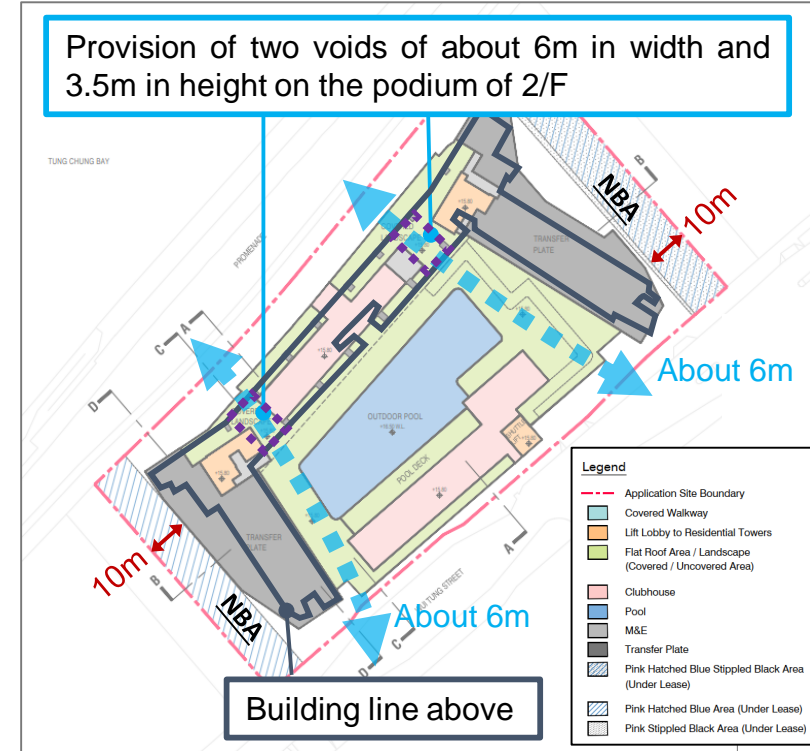
# Figure 3: Building Permeability Further Enhanced under Proposed Scheme

## Under Lease



- Under lease, there are two strips of non-building area (NBA), one along the northeastern boundary and one along the southwestern boundary.
- Both NBAs are 10m in width, to allow air permeability through the site.

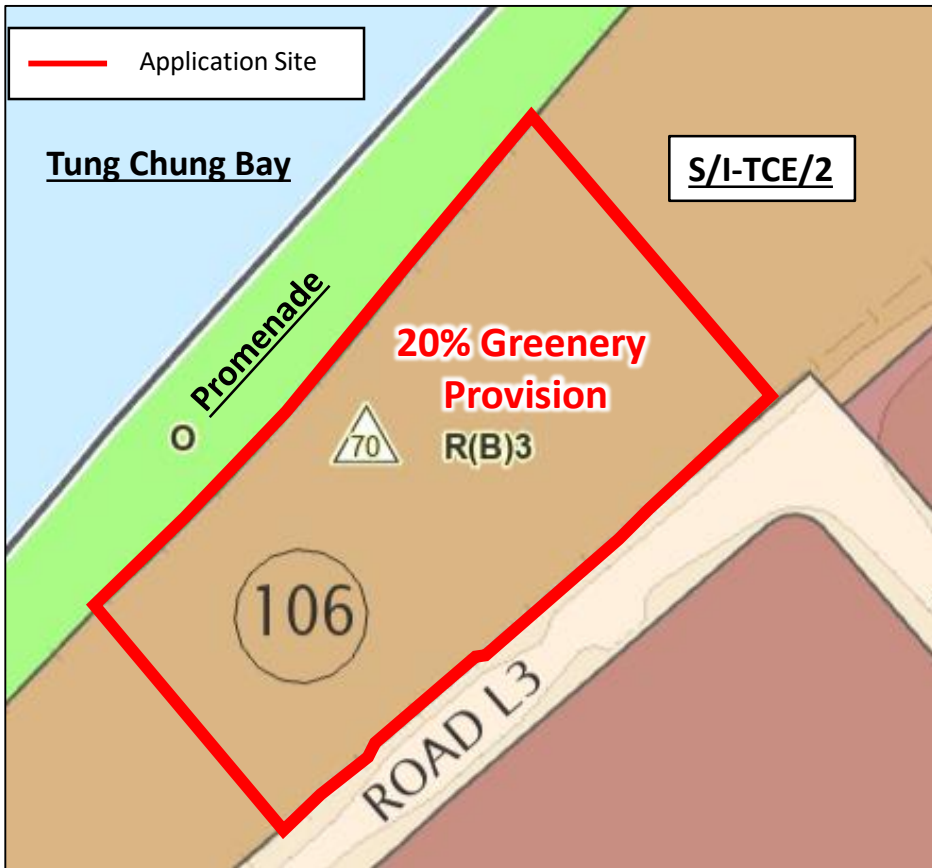
## Proposed Scheme



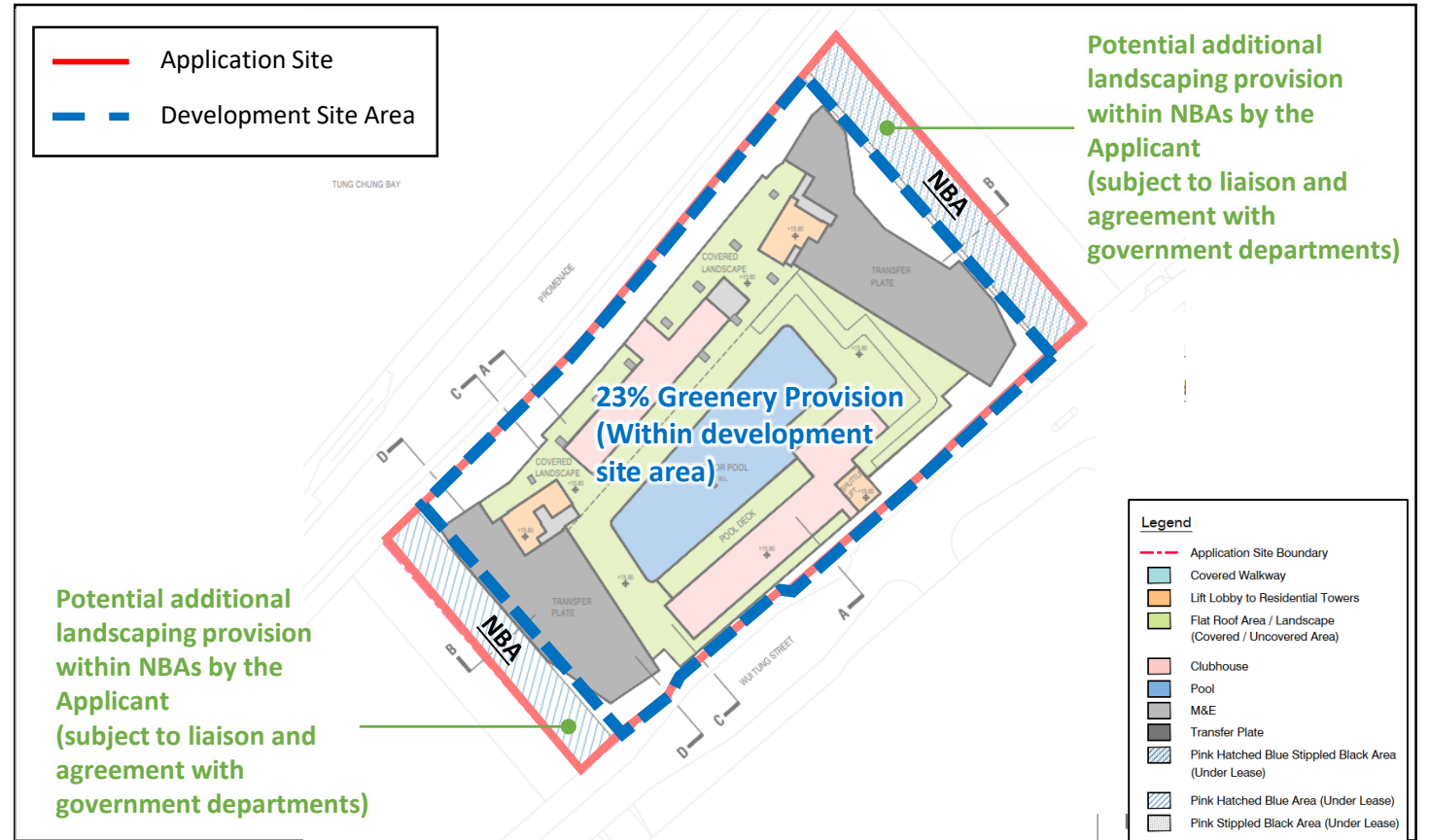
- Has respected the NBAs.
- Effort has been made to include additional design measure for air permeability.
- Two voids of about 6m in width and 3.5m in height are provided on the podium of 2/F to enhance permeability.

# Figure 4: Additional Greenery Provision within Development Site Area

## Minimum Greenery Provision under PNAP APP-152



## Additional Greenery Provision within Development Site Area



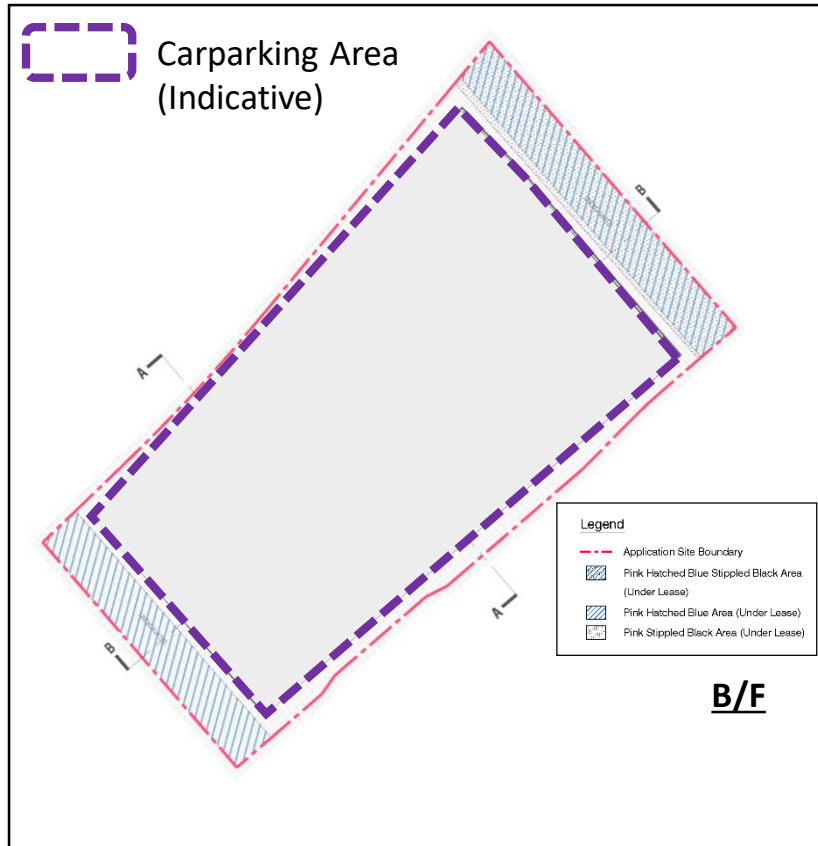
- In accordance with the requirement of the Sustainable Building Design Guidelines (PNAP APP-152), the overall minimum site coverage of greenery required for the entire Application Site is 20% (i.e. area within the red line).

- Given that the two strips of non-building area (NBA) along the northeastern and southwestern boundary will be surrendered back to the Government, in order not to reduce the overall greenery provision for the Application Site, the Applicant has distributed all the proposed greenery within the development site area (i.e. demarcated in blue dotted line). The greenery provision within the development site area is therefore able to achieve a coverage of not less than 23%.
- Besides, according to the lease, the Applicant will also need to provide landscaping provision within the two NBAs, subject to liaison and agreement with relevant government departments at detailed design stage. In turn, the two strips of NBAs might be able to provide additional greenery provision on top of those within the development site area, which will further enhance the streetscape of the Application Site.

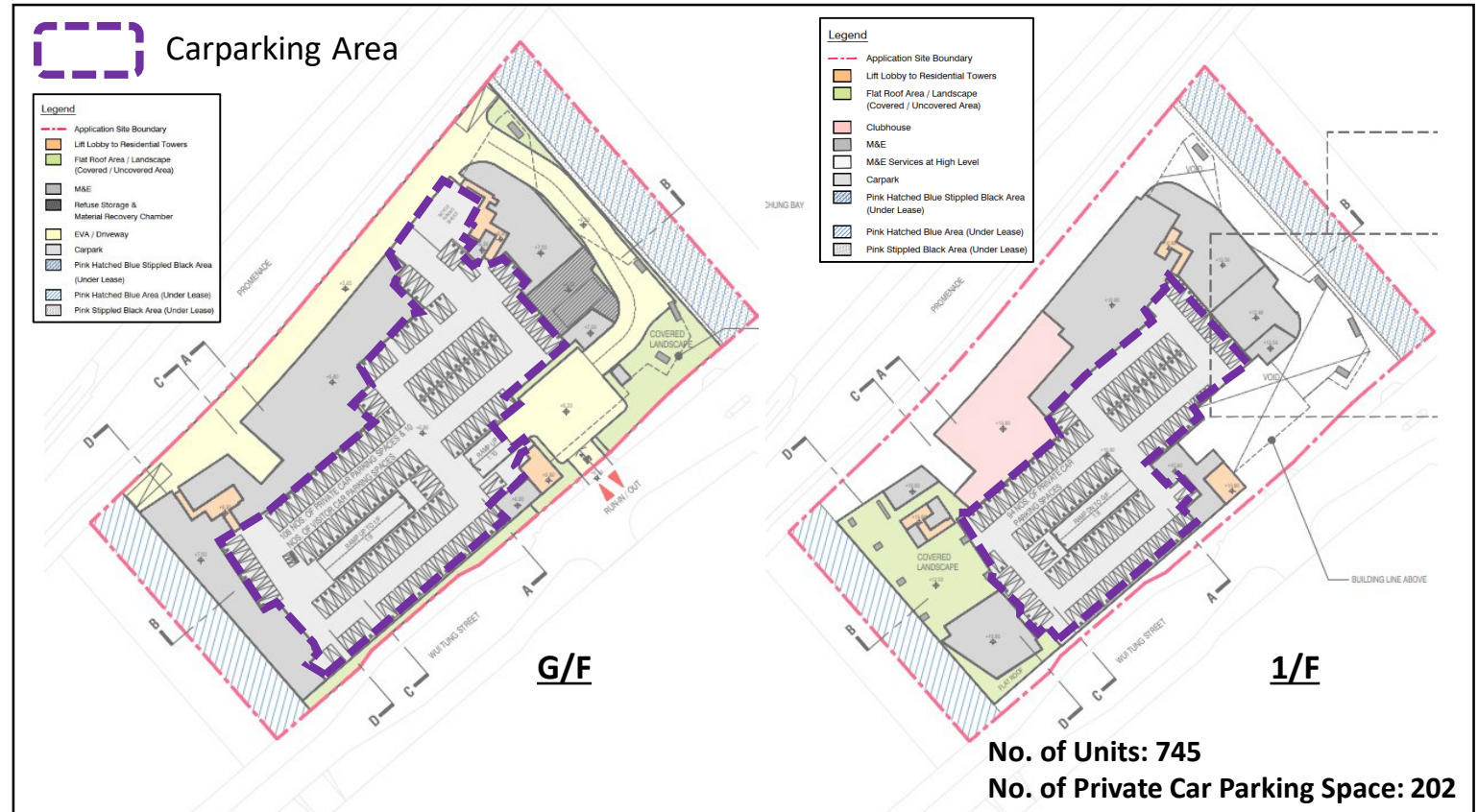
## **2. JUSTIFICATIONS FOR CAR PARK ARRANGEMENT**

# Figure 5: Carparking Extent Being Minimal to Minimise Building Bulk

## Indicative Basement Carpark Design Approach



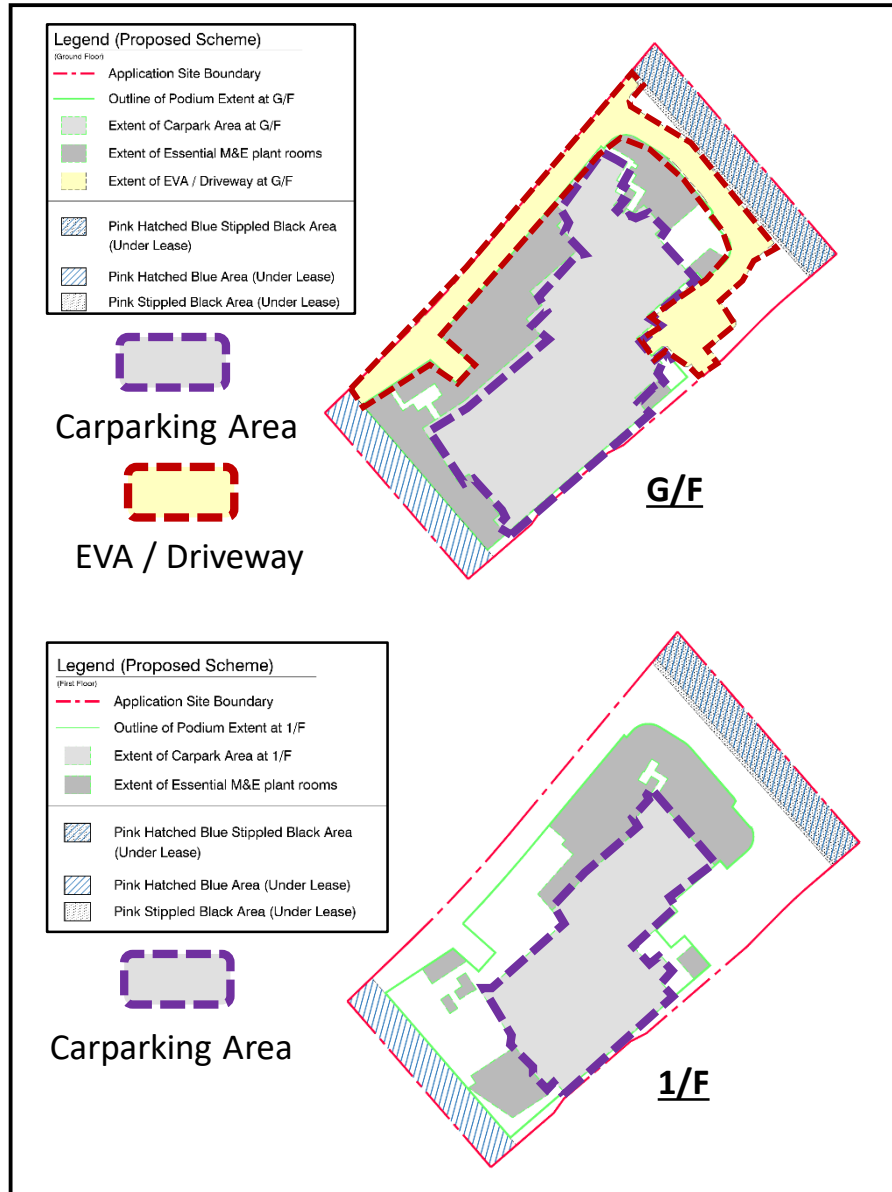
## Proposed Scheme (Detailed G/F & 1/F Plan) (Indicative Only)



- Number of car parking provision [based on the carparking ratio stipulated under Lease.](#)
- With basement carpark design, [apart from the NBAs and unexcavated areas reserved along site boundaries, the floor plate available for carpark could cover majority of the Application Site.](#)
- For the Proposed Scheme with carpark relocated above ground, [after taking into account the necessary EVA arrangement, ingress/egress points, etc., it is \*\*not\*\* feasible to accommodate all the car parking spaces on a single floor \(i.e. G/F\). Some of the required car parking spaces have to be accommodated on another floor \(i.e. 1/F\).](#)
- As shown in the above illustrative diagrams with detailed indicative carparking layout, the [maneuvering space provided in the carparking areas under the Proposed Scheme \(in 2 levels\) is reasonable. No excessive parking area is created to raise the building height.](#)

**Figure 6: Carparking Extent Constrained by EVA / Driveway Provision and 2 Carparking Storeys Are Necessary**

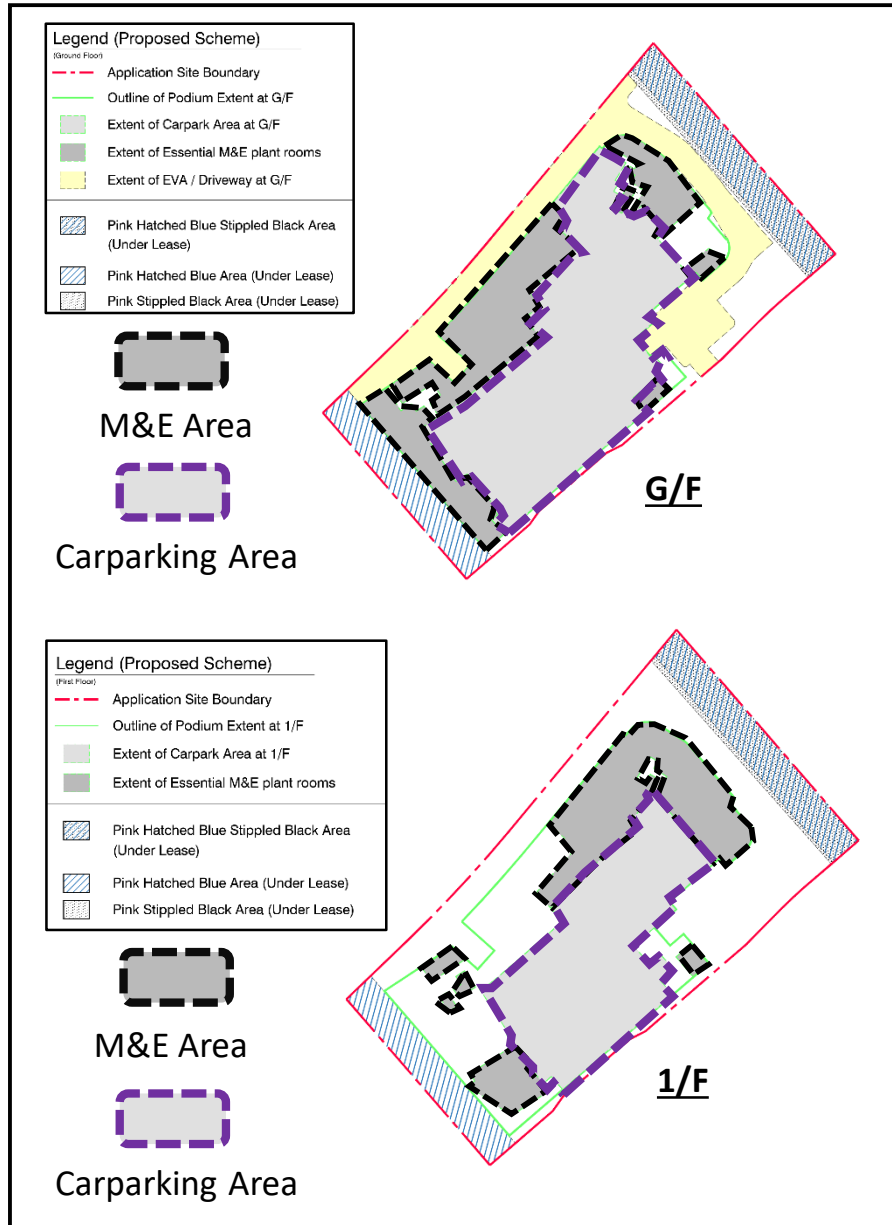
***Proposed Scheme***



- Under the Proposed Scheme with carparking floor provided above ground, there will be direct interfacing between the EVA / driveway and ground floor carpark structure.
- To achieve a more efficient carparking layout, [the EVA / driveway of the Proposed Scheme will need to be realigned to run along the edge of the Application Site to maximize the central portion of the G/F of the site for carparking structure.](#)
- Such interface issue would also [confine the carparking spaces to a smaller site coverage.](#) As a result, [2 storeys are required to accommodate largely the same number of carparking spaces under the Proposed Scheme.](#)

**Figure 7: M&E Provision and Layout Being Reasonable**

**Proposed Scheme**

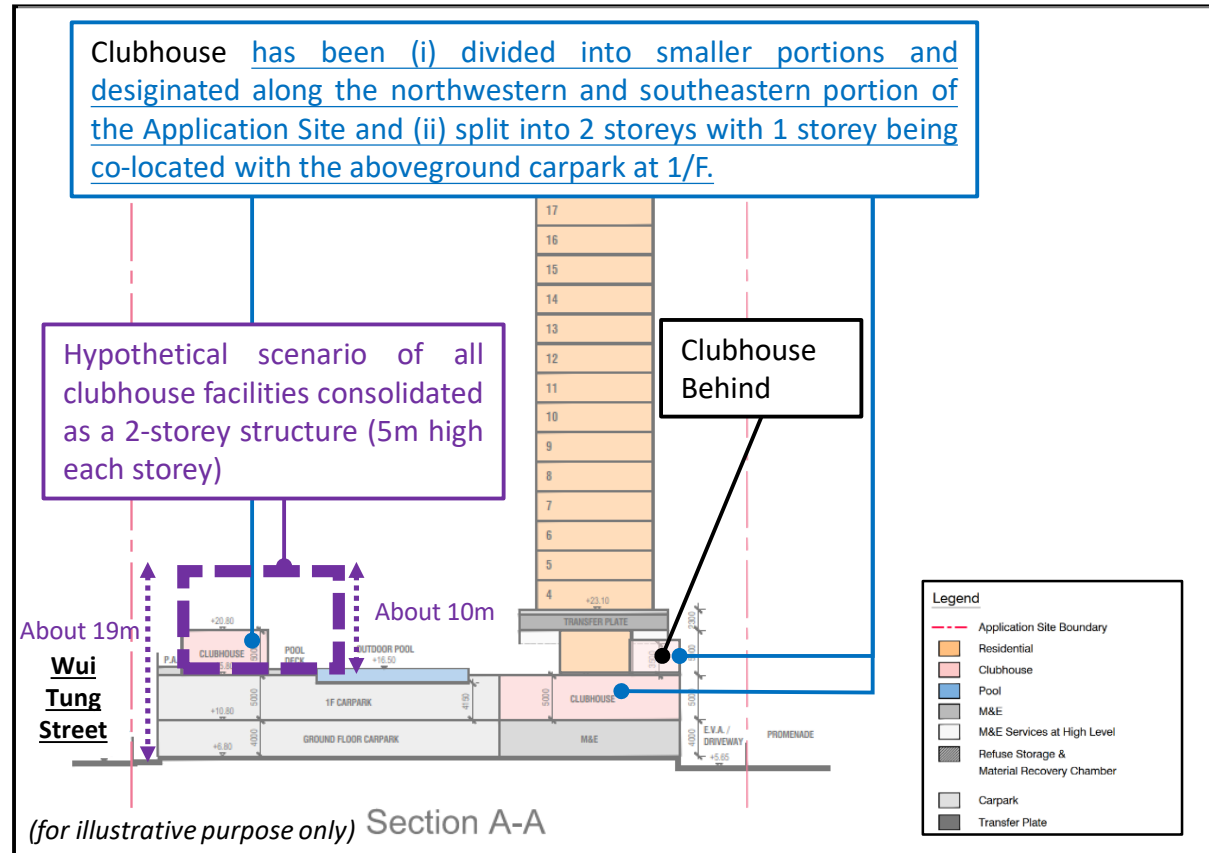


- The M&E plant room areas within the podium of the Proposed Scheme include [essential services which serve the entire development in addition to the carpark](#). To minimize building bulk of the development, the major M&E facilities are accommodated in the podium together with the carparking areas.
- Besides, [based on the latest Technical Guidelines for Electric Vehicle \(EV\) Charging-enabling for Car Parks of New building Developments published by the Government](#), all parking spaces shall be equipped with an EV charger with output power not less than 7kW, and a diversity factor of 1.0 is required to be satisfied (instead of 0.8 previously). [As such, about 50% extra area is required for transformer rooms and their associated main switch rooms due to the increased electrical load](#). Furthermore, version 16 of [CLP's Code of Practice No. 101 for Distribution Substation Design](#) requires [enlargement of transformer rooms when compared to the previous version](#), which further increases the required area.

### **3. JUSTIFICATIONS FOR LAYOUT OF CLUBHOUSE**

# Figure 8 Rationalise the Clubhouse Design to Avoid Excessive Height after Accommodating Aboveground Carpark

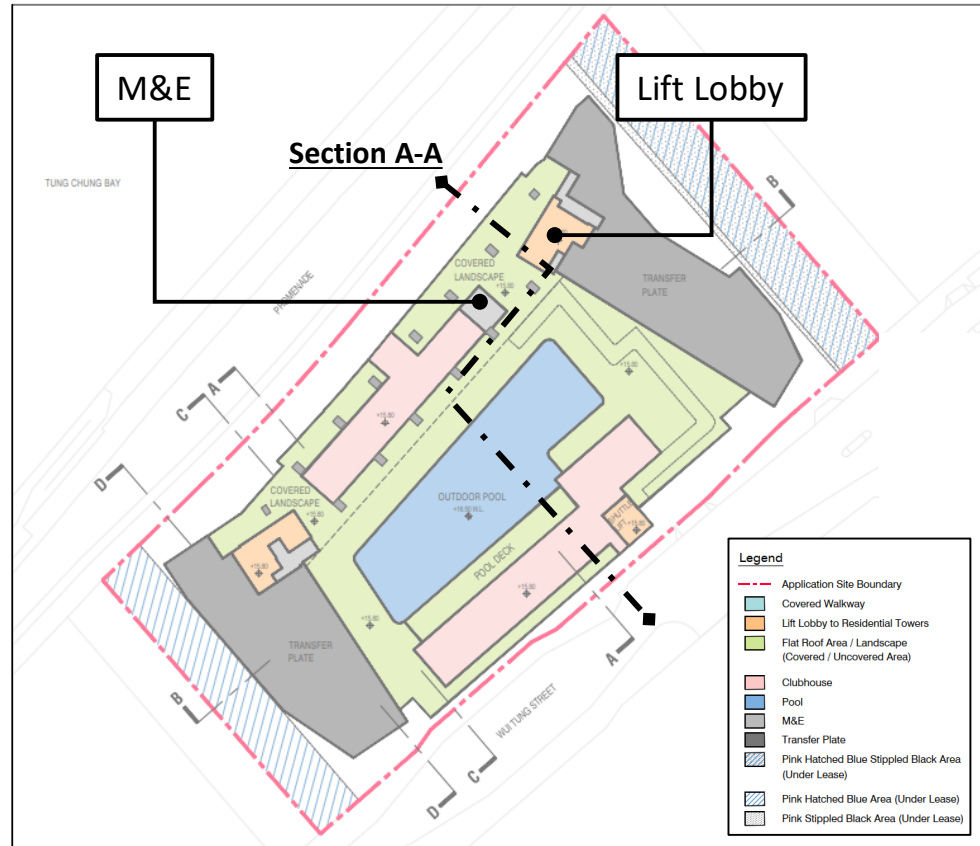
## Proposed Scheme



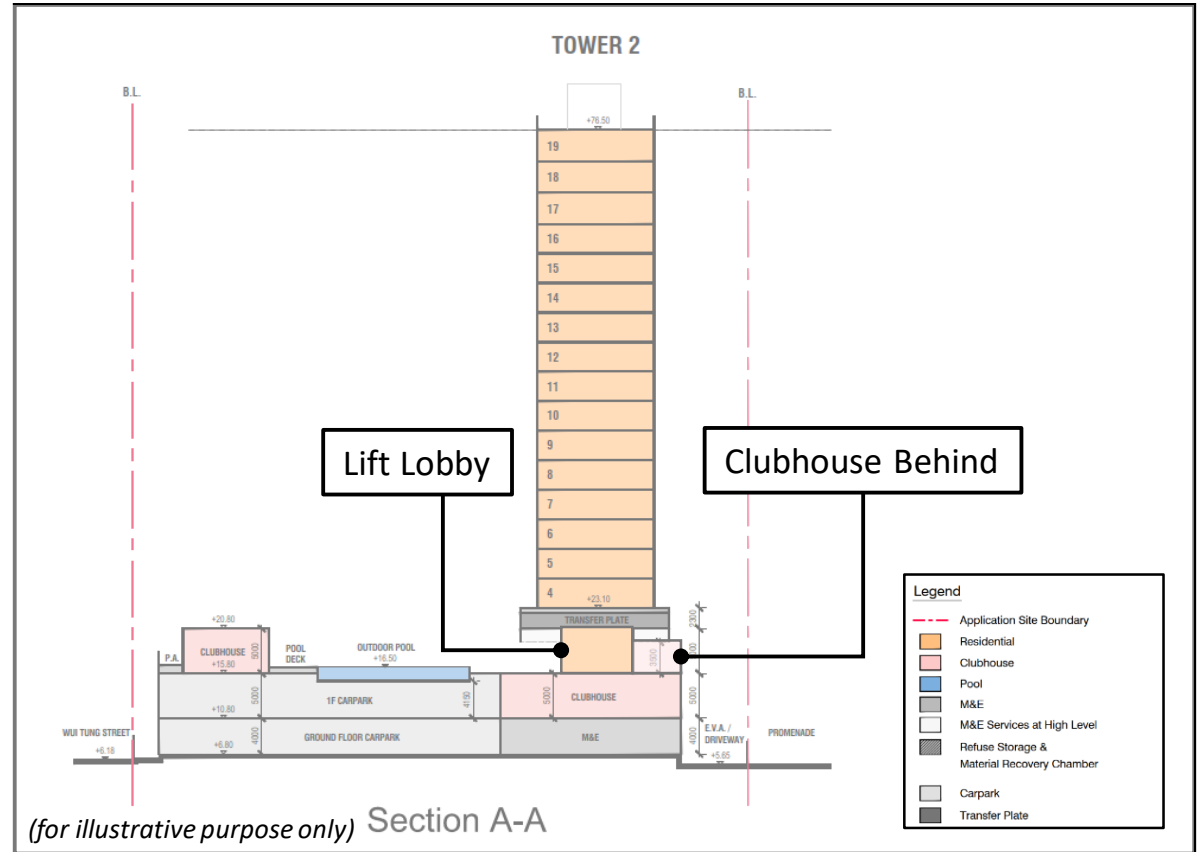
- Hypothetically, if the clubhouse facilities are consolidated as a 2 storey structure above podium, the overall height of the podium facing Wui Tung Street would become overly excessive (i.e. about 19m) after incorporating the aboveground carpark.
- The bulk of the clubhouse has been (i) divided into smaller portions and designated along the northwestern and southeastern portion of the Application Site and (ii) split into 2 storeys with 1 storey being co-located with the aboveground carpark at 1/F. Such design allows for reduction in podium bulk and enhance visual and wind permeability at pedestrian level especially along Wui Tung Street.

**Figure 9: Rationalise the Clubhouse Design to Avoid Excessive Height after Accommodating Aboveground Carpark**

**Proposed Scheme (2/F Plan)**



**Proposed Scheme (Section)**

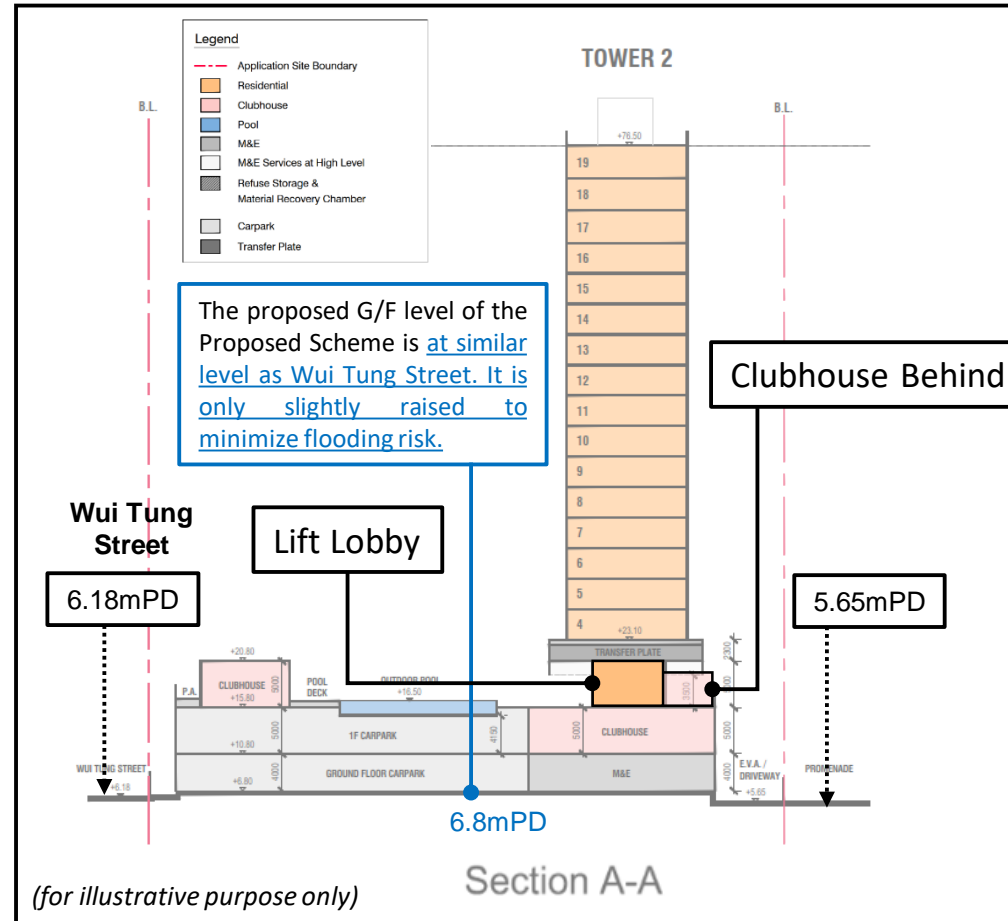


- Rather than dedicating 2/F solely for clubhouse, [clubhouse facilities are being co-located with the necessary lift lobbies and E&M facilities](#), as shown in the above 2/F Plan and Section A-A.
- The building height and building bulk has been minimized by [avoiding further stacking the clubhouse and residential lobby/ E&M on top of each other](#).

## **4. JUSTIFICATIONS FOR SITE LEVELS AND FLOOR HEIGHTS**

**Figure 10: Proposed Site Formation Level Being Reasonable**

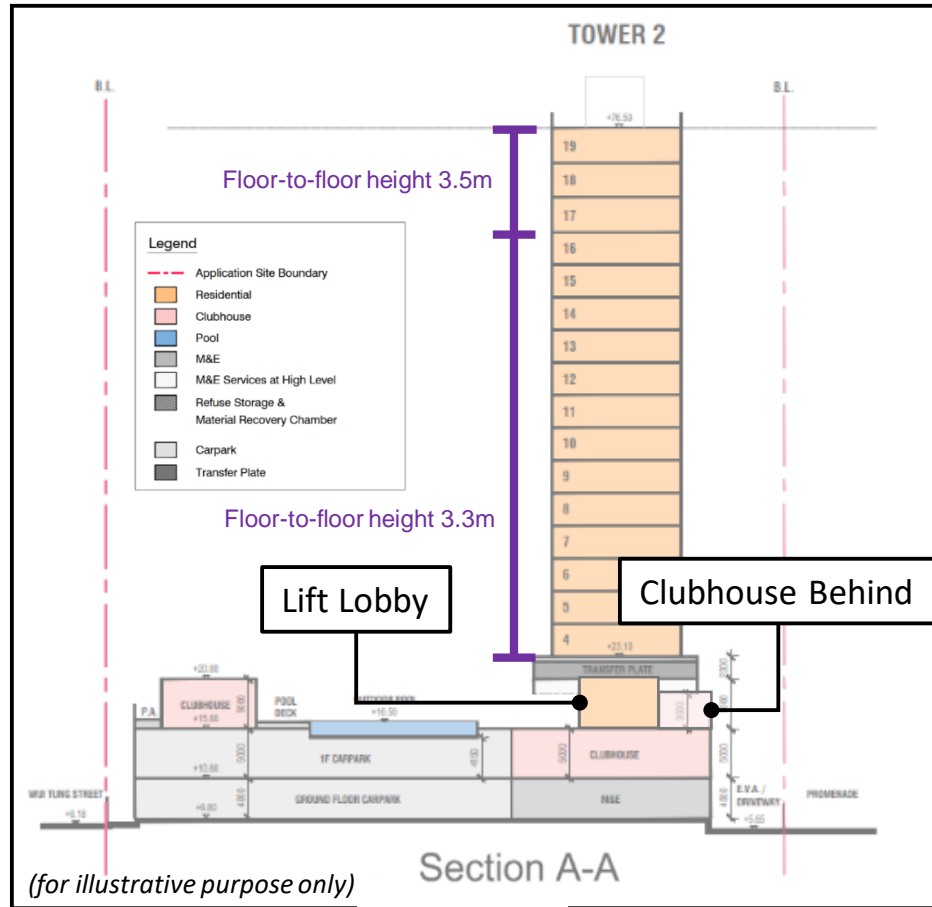
**Proposed Scheme**



- The proposed site formation level of 6.8mPD is [to mainly tie in with the street level of Wui Tung Street at 6.18mPD which is the ingress/egress point of the site.](#)
- According to the 50-year storm with climate change projected to the end of 21<sup>st</sup> Century, the flood level of the Tung Chung area is about 5.99mPD (based on the nearest Shek Pik Tide-gauge). [The proposed G/F level of 6.8mPD is slightly raised to minimize flood risk within the Application Site.](#)

**Figure 11: Proposed Residential Floor-to-Floor-Height Could Help Achieve Gold Rating of BEAM Plus as Required under Lease**

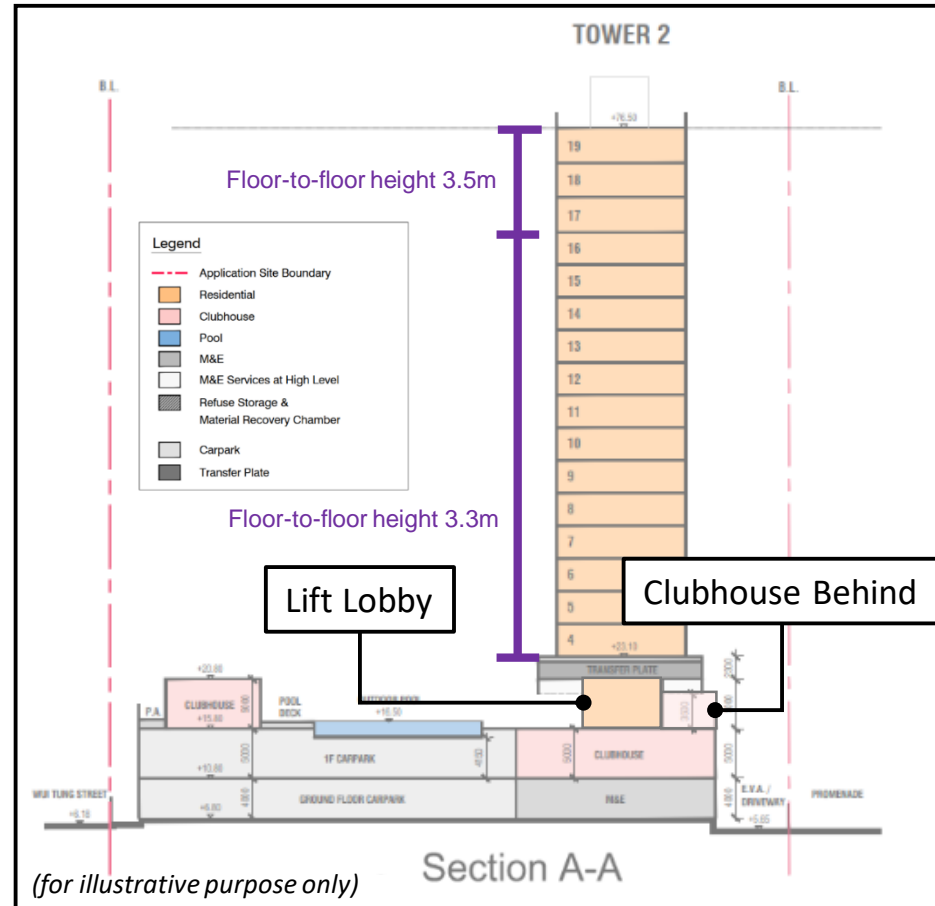
***Proposed Scheme***



- The development is [required under lease to obtain a Provisional Gold Rating](#), assessed under *BEAM Plus New Buildings Version 2.0*. To achieve a Gold Rating, it is a prerequisite condition to [meet ventilation requirements which are beyond the regulatory standards stipulated in Cap. 123F Building \(Planning\) Regulations](#) (i.e. the required size of the openable window would be [increased from 6.25% of the room's floor area to 7%](#)). The proposed typical storey height of 3.3m would contribute immensely towards [meeting the enhanced ventilation standards](#).
- The proposed typical floor-to-floor height of 3.3m will also be able to [provide better sunlight penetration and air ventilation to the indoor living environment of each residential unit](#), which is in line with the Government's policy of promoting better indoor living environment.

**Figure 12: Proposed Residential Floor to Floor Height Being Reasonable**

***Proposed Scheme***

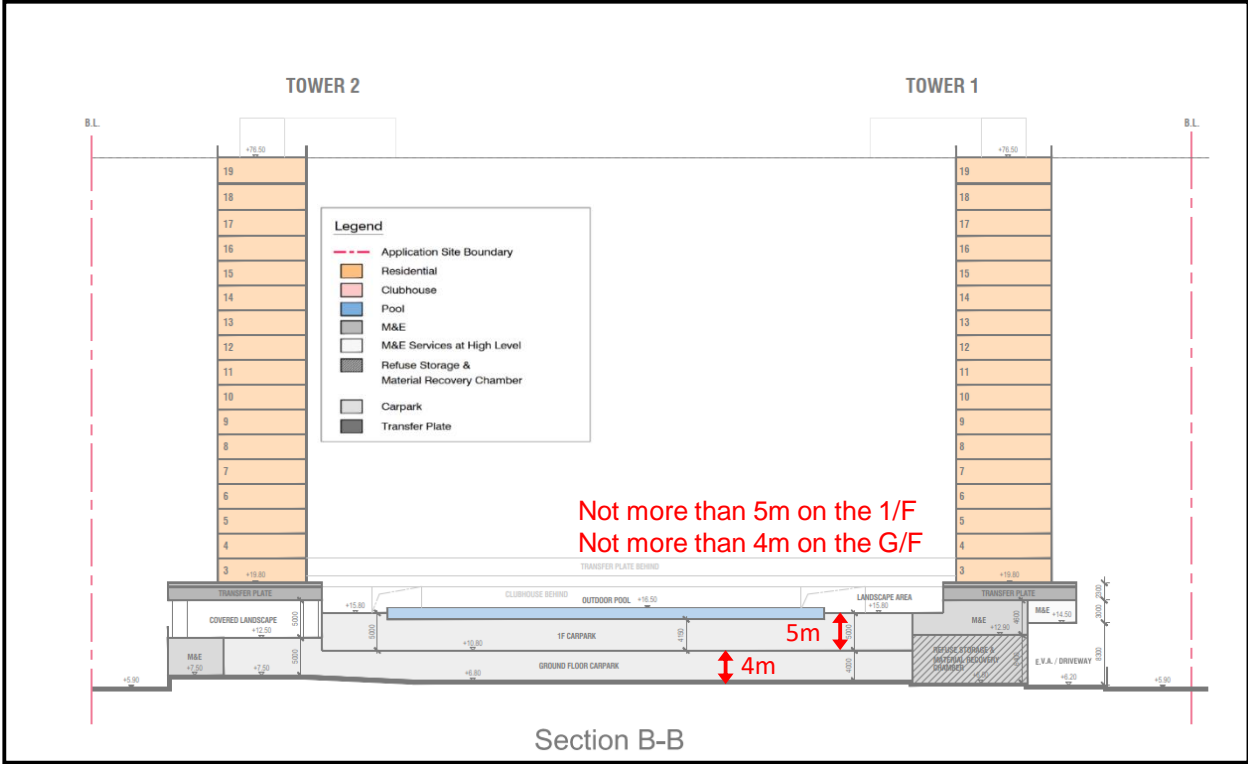


- The proposed typical floor-to-floor height of 3.3m is also the [prevailing market trend within the housing market in recent years](#). (e.g. *The Corniche 凱玥* (completed in 2022) [3.5m]; *One Park Place 柏景峰* (to be completed in 2027) [3.3m]; *Park Seasons* (completed in 2025) [3.325m]; and *Villa Garda 凱柏峰* (completed in 2024) [3.3m])
- The proposed floor-to-floor height also [does not exceed the maximum typical floor height \(i.e. 3.5m\) as stipulated under PNAP APP-5 of Buildings Department](#).



**Figure 14: Floor to Floor Height for Carpark Minimised**

***Proposed Scheme***



- For typical residential developments, it is common to adopt a headroom of 5m for carparking floors.
- Instead of designating both carparking floors with 5m high for the Proposed Scheme, the headroom of G/F is reduced to 4m, in order to reduce the overall building height as far as practicable while maintaining the minimum headroom requirement.

## **5. CONCLUSION**

## Conclusion

1. The Proposed Scheme has provided various [additional design merits](#) when compared with OZP conforming scenario, which includes:
  - About 6m to 7.45m setback of podium from promenade;
  - In addition to NBA, further setback of about 7.3m at lower levels is provided along northeastern NBA; and
  - Further enhanced building permeability with provision 2 nos. of voids of about 6m in width and 3.5m in height on the podium of 2/F.
  - Additional greenery provision within development site area with potential landscaping provision within NBAs.
2. The Proposed Scheme has provided [valid justifications for its carparking arrangement and E&M provision, with reasonable layout based on technical requirements.](#)
3. The Proposed Scheme has provided [valid justifications for its clubhouse layout, with the bulk of clubhouse facilities sub-divided into a few smaller bulk and location rationalized to minimize building bulk.](#)
4. The Proposed Scheme has provided [valid justifications for its site levels \(to address flood risk\) and floor heights.](#)

# llewelyn davies

ARCHITECTS PLANNERS DESIGNERS  
Llewelyn-Davies Hong Kong Ltd

28 April 2026

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

**By Fax and Email  
(2877 0245)**

Dear Sir

**Proposed Residential Development at Area 106B, Tung Chung, TCTL No. 55  
Section 16 Planning Application for Proposed Minor Relaxation of Maximum Building  
Height Restriction for Permitted Flat Use in "Residential (Group B) 3" Zone  
(Application No. A/I-TCE/7)**

Reference is made to the Further Information submitted to the Town Planning Board (the Board) on 20 March 2026 and the subsequent comments received from the District Planning Office/Sai Kung & Islands (DPO/SKIs) in April 2026.

As requested by DPO/SKIs, on behalf of the Applicant, we would like to hereby provide clarifications for the Board's consideration regarding the following aspects:

**Provision of Setback from Promenade**

- Despite having no setback requirement from the promenade under the Outline Zoning Plan and Lease, the Proposed Scheme **will commit to provide a setback of not less than 6m-wide from the promenade.**
- Similar to other residential developments in Hong Kong, boundary fencing will be provided along the Development Site boundary of the proposed residential development for security reasons, and the portion of fencing facing the promenade along the northeastern Development Site boundary will be of **permeable design** (e.g. metal grille). Accordingly, **the subject setback of not less than 6m will be designated along the northwestern boundary fronting the promenade behind boundary fencing.**

**Provision of Setback Facing the Northeastern Non-building Area**

- In accordance with the Lease, there are two strips of non-building area (NBA), one along the northeastern boundary and one along the southwestern boundary. **The Proposed Scheme has respected the NBAs.**
- While there is no setback requirement from the NBA under Lease, **the Proposed Scheme will commit to provide a continuous setback of about 7.3m-wide continuously at G/F along the northeastern strip of NBA.**

.../2

**No Adverse Air Ventilation Impact Anticipated**

- The Applicant would like to highlight that a comprehensive assessment on air ventilation of the planned developments in the Tung Chung Extension Area (including the permitted residential use in the Application Site and its adjacent sites) has been conducted by the Government under the Tung Chung New Town Extension Study (the Tung Chung Study). According to the Tung Chung Study, several **NBAs are planned to serve as breezeways taken into account of prevailing wind to improve air circulation and/or to provide major view corridors from the hillside to the sea area to the north. They are strategically placed in order to create a comprehensive breezeway system to promote better air ventilation and urban climate.**
- While there is no NBA requirement under OZP for the Application Site, the recommendations under the Tung Chung Study have been reflected in the Explanatory Statement (ES) of the Notes of the OZP as well as the Lease of the subject lot. Two NBAs (10m wide for each) are required along the northeastern and southwestern boundaries, which serve as breezeways under the Tung Chung Study. **In other words, with provision of the two NBAs within the Application Site as stipulated under the Lease, any residential developments on the site without encroaching upon the two NBAs would deem acceptable in general from air ventilation perspective. As the Proposed Scheme has maintained and fully respected the two NBAs, no adverse air ventilation impact is anticipated.**
- Besides, under the First Schedule of the Building (Planning) Regulations, **100% site coverage is permitted for the subject non-domestic podium of the Proposed Development up to 15m above ground (without encroachment on the two NBAs).** However, the Applicant **has taken an initiative to reduce the bulk of the podium (including further setbacks from the promenade and facing the northeastern NBA at the street level). Since air ventilation performance concerns more at the pedestrian level, the abovementioned design measures, together with maintaining the two NBAs, no adverse air ventilation impact is anticipated from the Proposed Development, despite the minor relaxation of building height.**

**No Change in Other Development Parameters and Internal Transport Provision**

- In response to comments from the Transport Department, please be clarified that when compared to the latest Approved GBP Scheme (February 2026), the Proposed Scheme has (i) **no change in GFA;** (ii) **no change in no. of units and average flat size;** (iii) **slight reduction of 6 nos. in parking spaces due to adjustment in flat mix (calculated in accordance with the carparking scale under lease);** and (iv) **no change in run-in/out.**

Town Planning Board  
Page 3 of 3  
28 April 2026

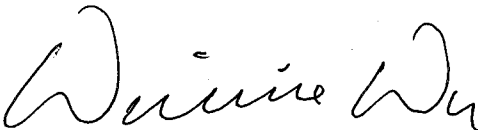
**Enhancements Made under the Proposed Scheme as Compared with the Latest Approved GBP (February 2026)**

- The Applicant would also like to provide elaboration on the comparison between the latest Approved GBP (February 2026) and enhancements made under the Proposed Scheme regarding (i) site formation level; (ii) podium levels; and (iii) residential floors. For details, please refer to **Attachment 1**.

The above Further Information only provide clarifications and elaborations as per comments received from DPO/SKIs. There are no changes to the Proposed Scheme, nor any development parameters and technical assessments. Hence, the Applicant sincerely requests the Board to consider the captioned application favourably in its meeting scheduled on 8 May 2026.

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

Yours faithfully  
for Llewelyn-Davies Hong Kong Ltd



Winnie Wu  
Planning Director

WW/AK/el  
Encl

[REDACTED]

**Attachment 1 – Enhancements Made under the Proposed Scheme as Compared with the Latest Approved GBP (February 2026)**

Items	Latest Approved GBP (February 2026)	Enhancements Made under Proposed Scheme
<p><b>Site Formation Level</b></p>	<p>Being constrained by the overall BH restriction of 70mPD, site formation level was set at 5.2mPD, which was in fact sunken by approximately 1m below the street level of Wui Tung Street at 6.18mPD. The sunken design would be prone to a higher risk of flooding, and is an undesirable compromise that does not fully exemplify the advantages of an aboveground carpark.</p>	<p>With proposed minor relaxation of the maximum BH restriction, more desirable and appropriate arrangement could be allowed for the site formation level:</p> <p><b><u>Site Level Rationalized to Match with Street Level</u></b>                      The proposed site formation level of 6.8mPD is to mainly tie in with the street level of Wui Tung Street at 6.18mPD which is the ingress/egress point of the site.</p> <p><b><u>Minimising Flood Risk</u></b>                      According to the 50-year storm with climate change projected to the end of 21st Century, the flood level of the Tung Chung area is about 5.99mPD (based on the nearest Shek Pik Tide-gauge). The proposed G/F level of 6.8mPD is slightly raised to minimize flood risk within the Application Site and therefore upholding the safety of future residents.</p> <p><b><u>In Line with Government’s Policy Intent of Aboveground Carpark</u></b>                      The carpark design under the Approved GBP Scheme with lowering of site level is indeed a “sunken” aboveground carpark with excavation involved. The current design of carpark is truly an aboveground carpark that fully materialize the policy intent of Government’s facilitation measures on provision of aboveground carpark.</p>

Items	Latest Approved GBP (February 2026)	Enhancements Made under Proposed Scheme
<p><b>Podium Levels</b></p>	<p>Being constrained by the overall BH restriction of 70mPD, the headroom of various podium levels were very stringent and could only meet bare minimum headroom requirements (about 3.7m at the lowest point) for the necessary structural and building services zones; ventilation would also have to be achieved via mechanical means despite being located aboveground. The constrictive headroom requirements also result in frequent level changes at podium of 2/F.</p>	<p>With proposed minor relaxation of the maximum BH restriction, more desirable and appropriate headroom for podium levels could be allowed:</p> <p><b><u>Higher Headroom for Safety and Ventilation</u></b></p> <p>A more appropriate headroom (4m and 5m for G/F and 1/F respectively) in the Proposed Scheme would allow for more sufficient space to be provided for building services maintenance, which could reduce the potential hazards associated with restricted working spaces. The higher headroom also has potential for natural ventilation of the carparking areas, thus making full use of the aboveground aspect of the Proposed Scheme.</p> <p><b><u>Promoting Elderly-Friendly Building Design</u></b></p> <p>The provision of sufficient headroom for podium floors at G/F and 1/F translates to a consistent podium level at 2/F, allowing for ramps/steps-free circulation across the entire landscaped deck for the benefit and enjoyment of future residents across all age groups. This enhancement would align with the Legislative Council's aim of promoting elderly-friendly building design, which was announced in November 2024.</p>

Items	Latest Approved GBP (February 2026)	Enhancements Made under Proposed Scheme
<b>Residential Floors</b>	Being constrained by the overall BH restriction of 70mPD, the floor-to-floor-height of typical residential floors was proposed as 3.15m.	<p>With proposed minor relaxation of the maximum BH restriction, more desirable floor-to-floor-height of typical residential floors with 3.3m could be adopted, which offers the following merits:</p> <p><b><u>Better Indoor Living Environment</u></b> The higher floor-to-floor height is able to provide better sunlight penetration and air ventilation to the indoor living environment of each residential unit, thus in line with the Government’s policy of promoting better indoor living environment.</p> <p><b><u>Facilitate Higher Standard of BEAM Plus</u></b> Moreover, the development is required under lease to obtain a Provisional Gold Rating, assessed under BEAM Plus New Buildings Version 2.0. To achieve a Gold Rating, it is a prerequisite condition to meet ventilation requirements which are beyond the regulatory standards stipulated in Cap. 123F Building (Planning) Regulations (i.e. the required size of the openable window would be increased from 6.25% of the room’s floor area to 7%). The proposed typical storey height of 3.3m would contribute immensely towards meeting the enhanced ventilation standards.</p> <p><b><u>Keep Up with Prevailing Market Trend</u></b> The proposed typical floor-to-floor height of 3.3m is also the prevailing market trend within the housing market in recent years. (e.g. The Corniche 凱玥 (completed in 2022) [3.5m]; One Park Place 柏景峰 (to be completed in 2027) [3.3m]; Park Seasons (completed in 2025) [3.325m]; and Villa Garda 凱柏峰 (completed in 2024) [3.3m]).</p> <p><b><u>Not Excessive and In Line with PNAP APP-5</u></b> Besides, the proposed floor-to-floor height does not exceed the maximum typical floor height (i.e. 3.5m) as stipulated under PNAP APP-5 of Buildings Department.</p>