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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

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Encl

Responses to Departmental Comments

	Departmental Comments	Responses to Comments
1.	Comments of Sai Kung & Islands District Planning Office, Planning Department	
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><u>Extent of M&E Formulated Based on Further Detailed Design</u></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&E provisions, which results in the changes in the extent of M&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&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&E provision taken into account, the extent and scale of M&E is by no means excessive and is provided in accordance with the prevailing requirements as prescribed under BD’s PNAP APP-2.</p>

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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&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&E facilities are also provided to enable EV charging facilities of faster charging standard for the carparking spaces. Accordingly, the relevant M&E facilities are split into 2 levels at G/F and 1/F adjoining the carparking spaces.</p> <p><u>Location and Headroom of Proposed M&E is Optimal</u></p> <p>For clarity sake, an area previously annotated as M&E adjoining the northeastern portion of G/F carparking space should be more specifically referred to as Refuse Storage & 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&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&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&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>

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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>

	Departmental Comments	Responses to Comments
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>