

**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. A/I-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

Attachment 1

Responses to Comments Table

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Responses to Departmental Comments

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	Departmental Comments	Responses to Comments
1.	Comments of District Planning Office/ Sai Kung & Islands, Planning Department	
	<p><u>General Comments</u></p> <p>1.1 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 based on a development proposal with strong individual merits for the development proposal. 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&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&M provisions to support residential development and EV charging are weak and lack sufficient design merits.</p> <p>1.2 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>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 (see Attachments 2 and 3).</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>

	Departmental Comments	Responses to Comments
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 Attachments 2 and 3 for details.</p>

	Departmental Comments	Responses to Comments
	<p><u>Specific Comments</u></p>	
1.3	<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>Noted. The revised set of drawings, development schedule and supplementary drawings for the Proposed Scheme have been prepared in Attachments 2 and 3 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>
1.4	<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>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 Attachments 2 and 3 for details.</p>

	Departmental Comments	Responses to Comments
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 Attachments 2 and 3 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 21st 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 Attachments 2 and 3 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.

	Departmental Comments	Responses to Comments
2.	Comments of Civil Aviation Department	
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>

	Departmental Comments	Responses to Comments
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.
3.	Comments of Transport Department	
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.
4.	Comments of Drainage Services Department	
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.

	Departmental Comments	Responses to Comments
5.	Comments of Electrical and Mechanical Services Department	
	<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: https://www.emsd.gov.hk/filemanager/en/content_286/CoP_gas_pipes_2nd_(Eng).pdf	Noted.
6.	Comments of Fire Services Department	
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.

Attachment 2

Revised Drawings and

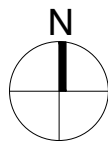
Development Schedule (Changes in Bold and Italic)

Indicative Development Schedule of the Proposed Scheme

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

Remarks:

- (1) Including 2 levels of aboveground carpark / 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) 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.



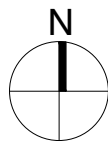
TUNG CHUNG BAY



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]	



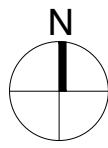
TUNG CHUNG BAY



Legend

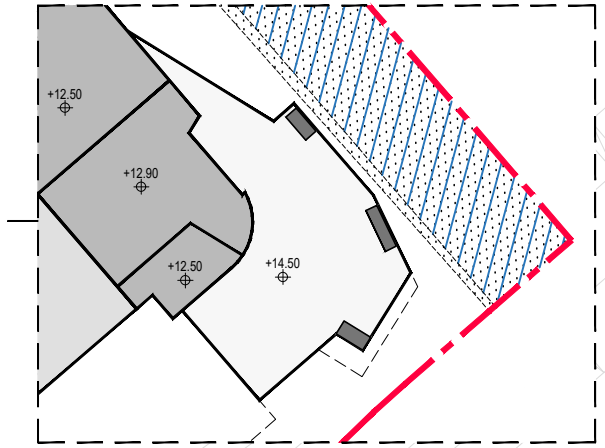
- Application Site Boundary
- Lift Lobby to Residential Towers
- Flat Roof Area / Landscape (Covered / Uncovered Area)
- M&E
- Refuse Storage & Material Recovery Chamber
- EVA / Driveway
- Carpark
- Pink Hatched Blue Stippled Black Area (Under Lease)
- Pink Hatched Blue Area (Under Lease)
- Pink Stippled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

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













TUNG CHUNG BAY

Part Plan at High Level



Legend

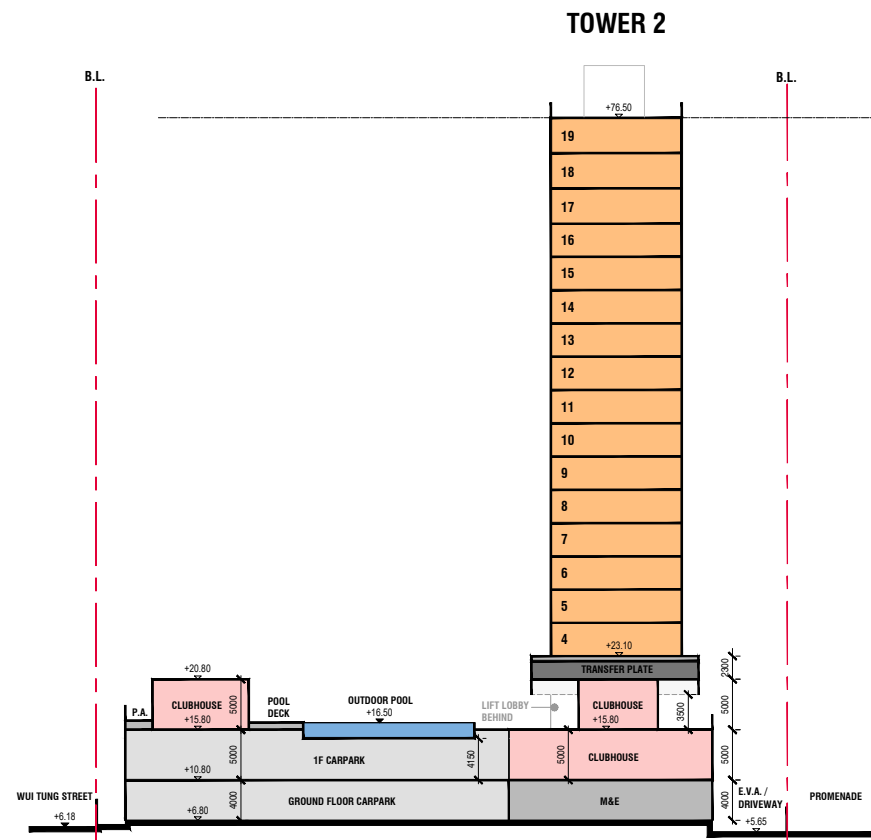
-  Application Site Boundary
-  Lift Lobby to Residential Towers
-  Flat Roof Area / Landscape (Covered / Uncovered Area)
-  Clubhouse
-  M&E
-  M&E Services at High Level
-  Carpark
-  Pink Hatched Blue Stippled Black Area (Under Lease)
-  Pink Hatched Blue Area (Under Lease)
-  Pink Stippled Black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



TUNG CHUNG BAY



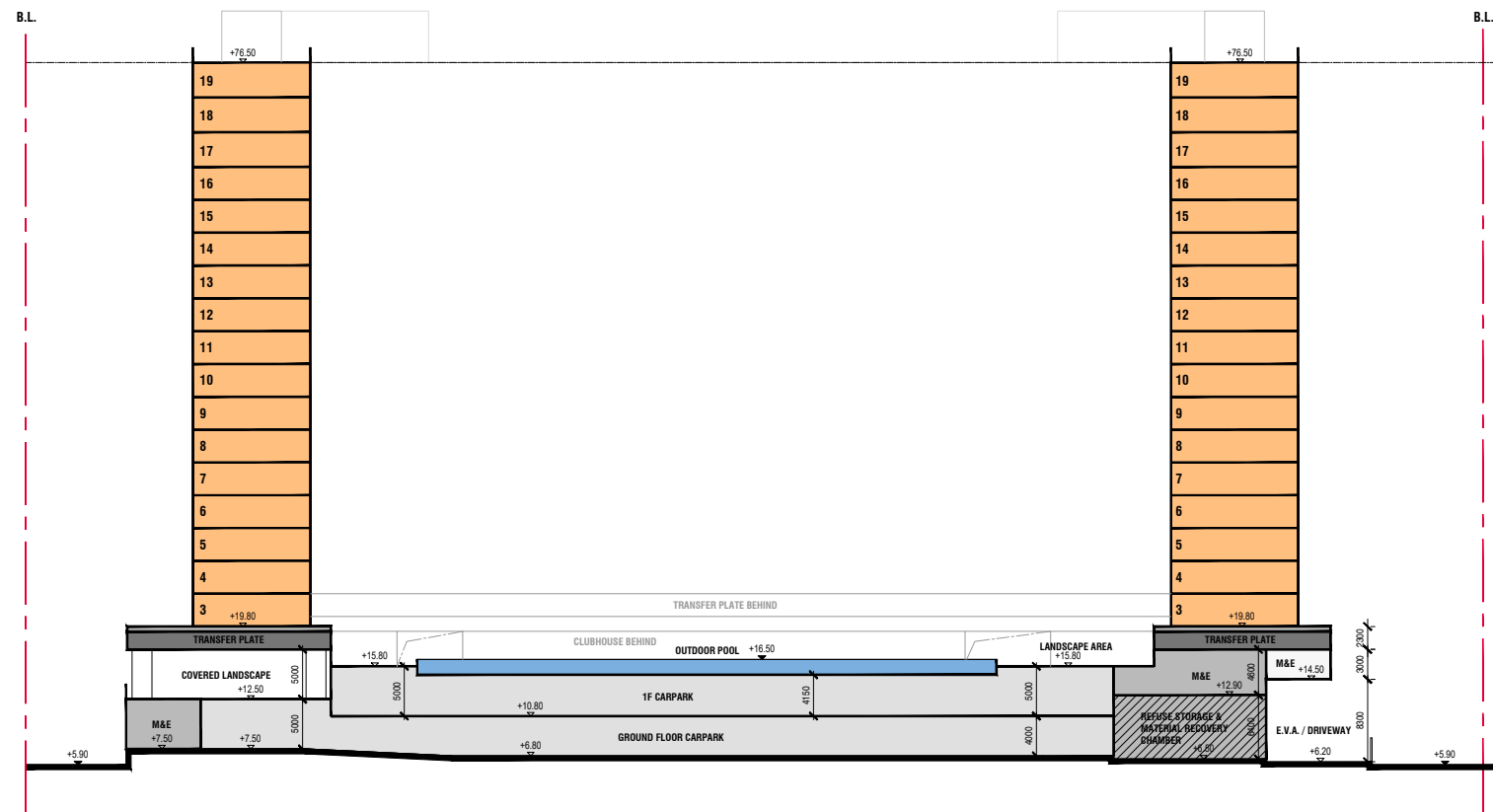
Legend	
	Application Site Boundary
	Covered Walkway
	Lift Lobby to Residential Towers
	Flat Roof Area / Landscape (Covered / Uncovered Area)
	Clubhouse
	Pool
	M&E
	Transfer Plate
	Pink Hatched Blue Stippled Black Area (Under Lease)
	Pink Hatched Blue Area (Under Lease)
	Pink Stippled Black Area (Under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



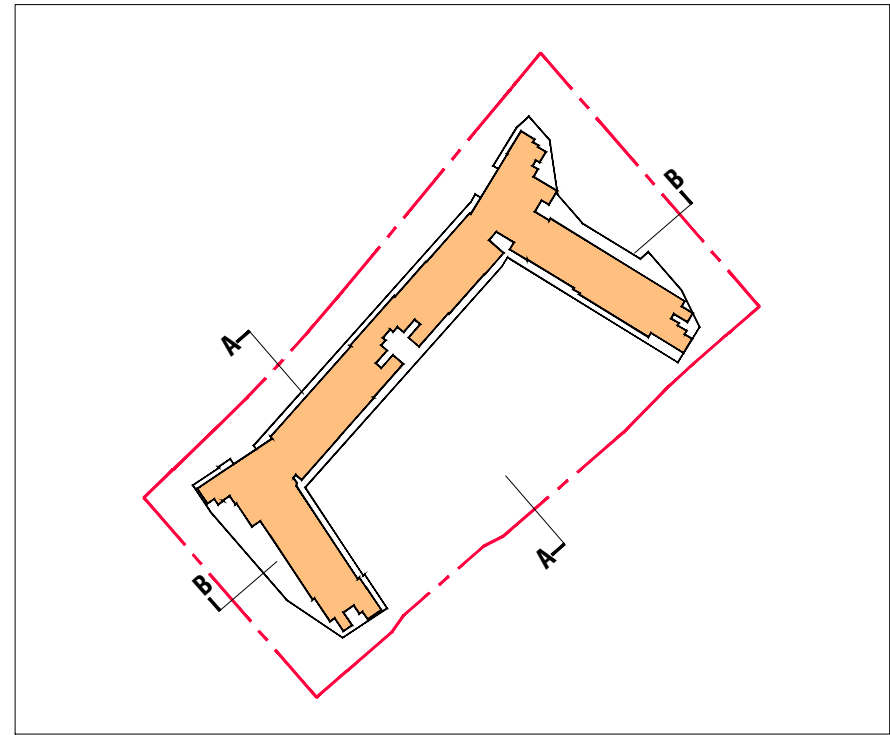
Section A-A

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

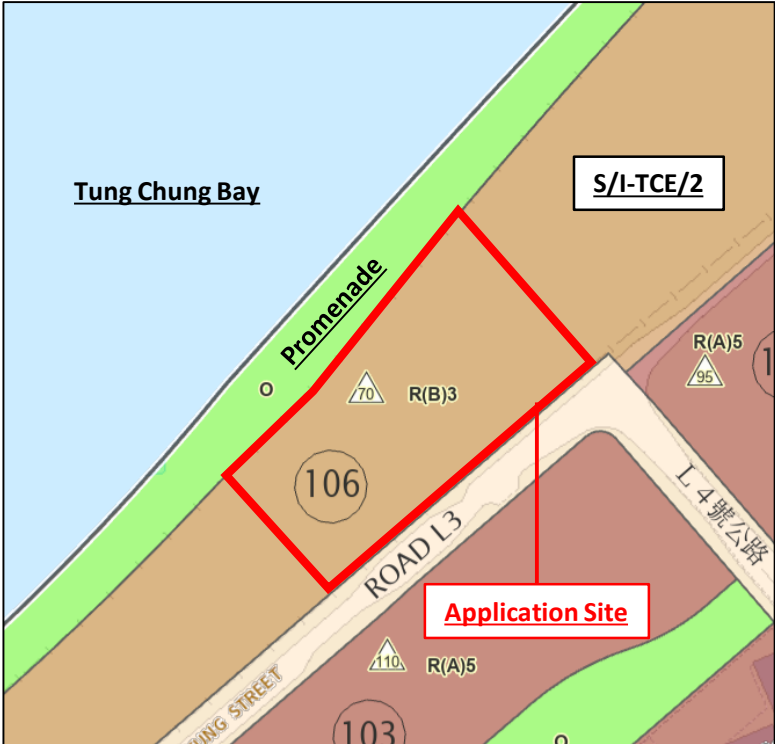
Attachment 3
Supplementary Drawings

- 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

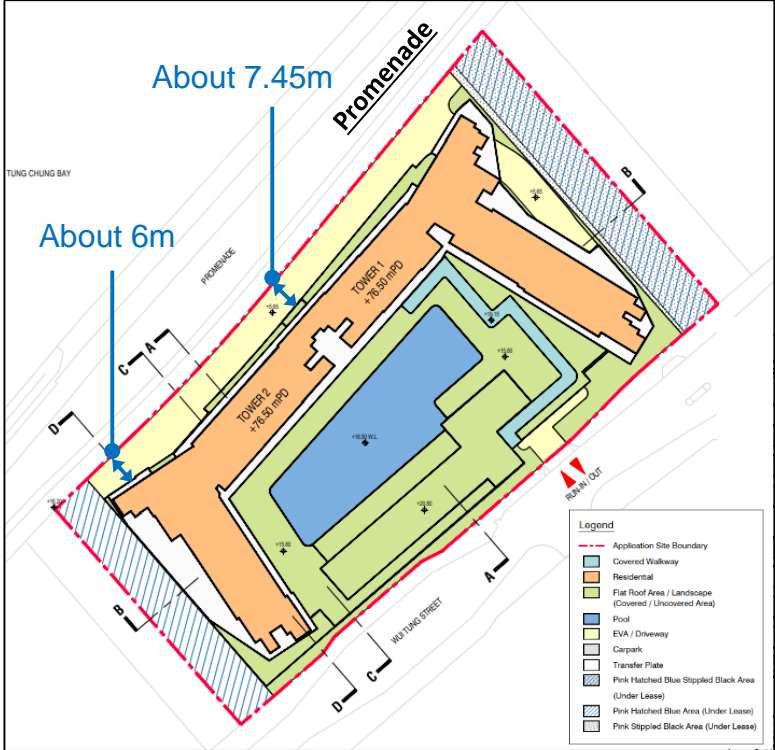
Figure 1: Provision of Additional Setback from Promenade

Under OZP (and Lease)



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

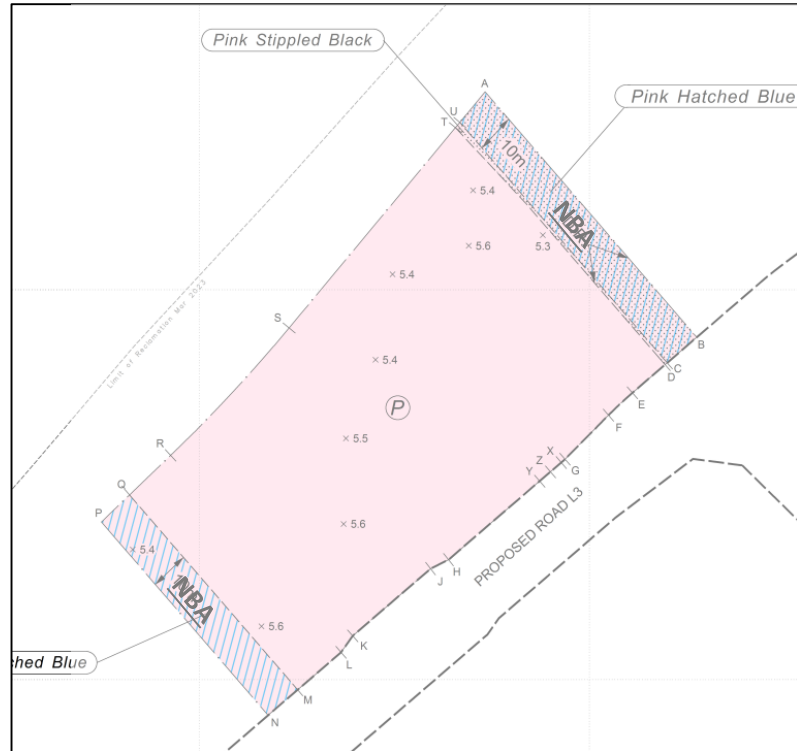
Proposed Scheme



- 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.

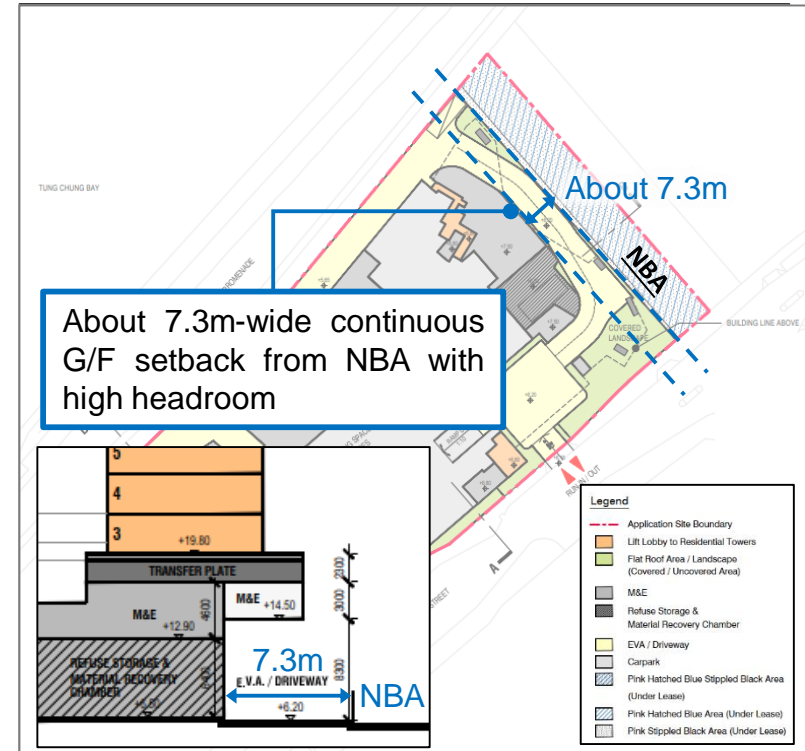
Figure 2: Provision of Further Setback in Addition to NBA Requirement

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.

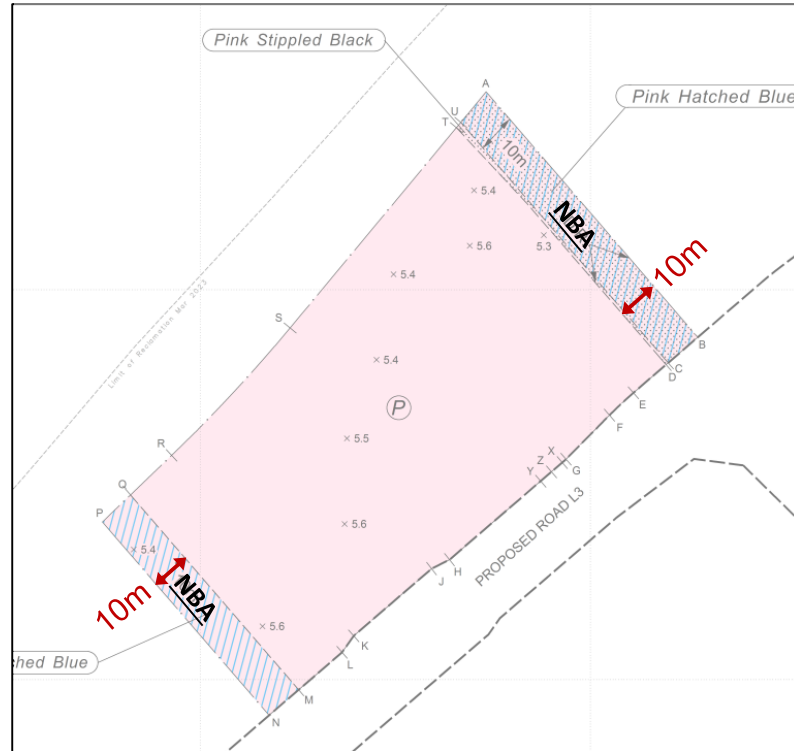
Proposed Scheme



- 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.

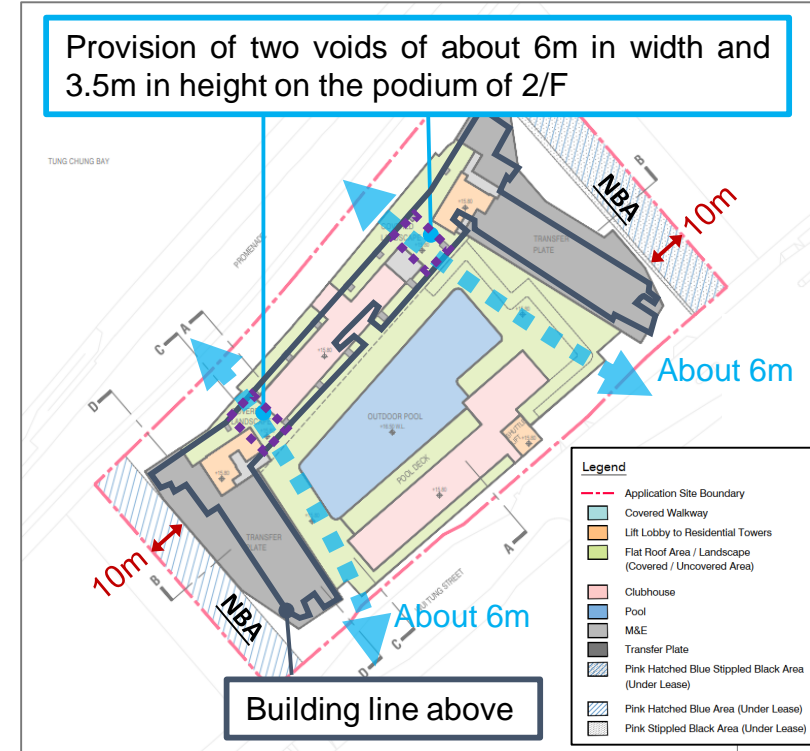
Figure 3: Building Permeability Further Enhanced under Proposed Scheme

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.

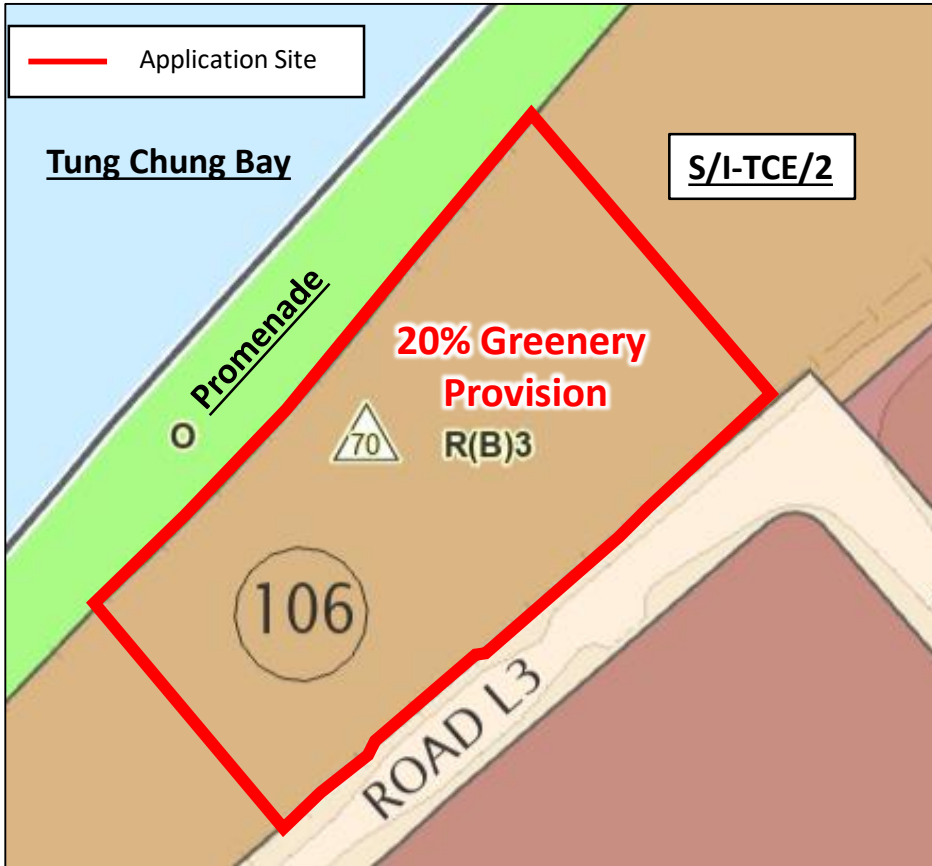
Proposed Scheme



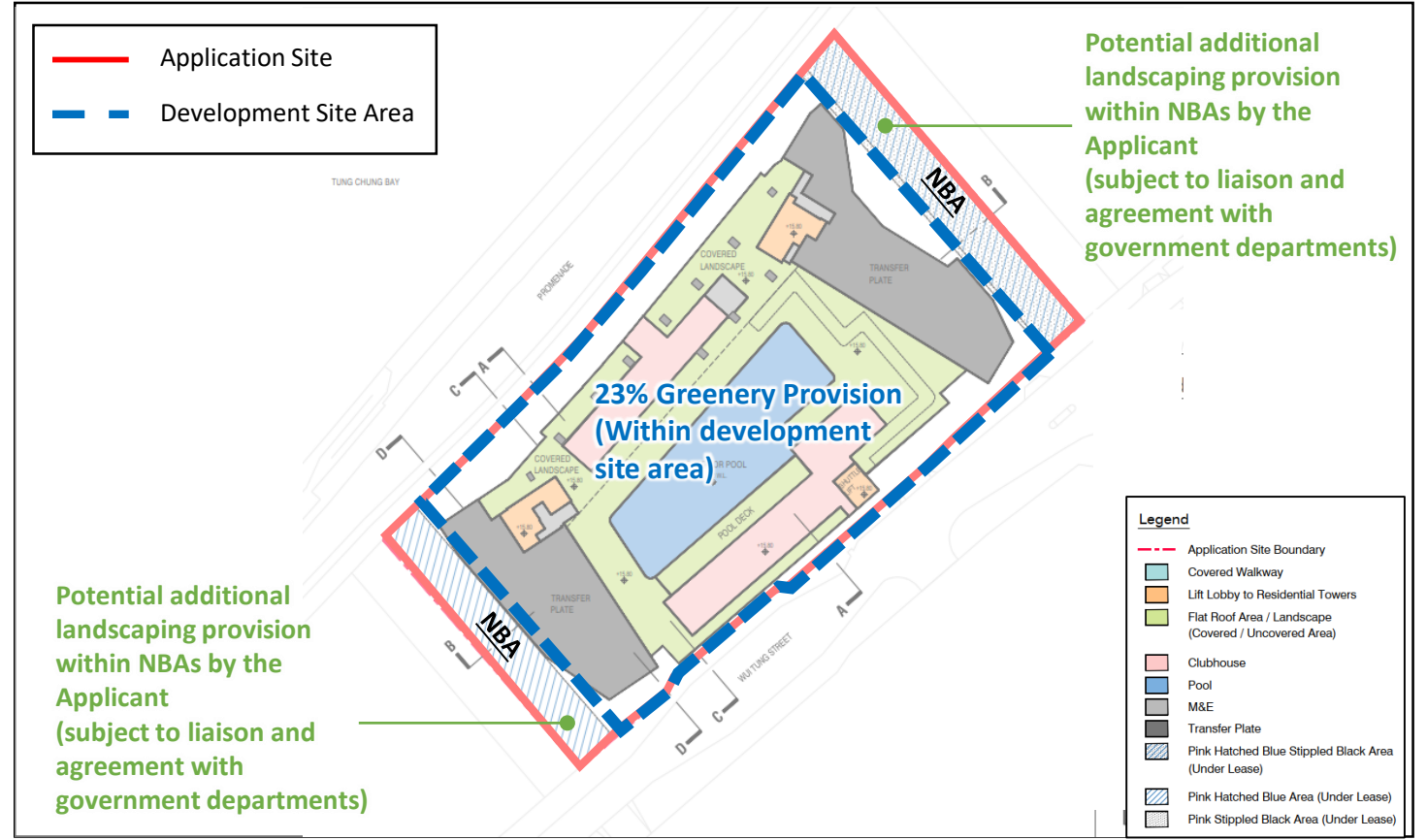
- Has respected the NBAs.
- Effort has been made to include additional design measure for air permeability.
- Two voids of about 6m in width and 3.5m in height are provided on the podium of 2/F to enhance permeability.

Figure 4: Additional Greenery Provision within Development Site Area

Minimum Greenery Provision under PNAP APP-152



Additional Greenery Provision within Development Site Area



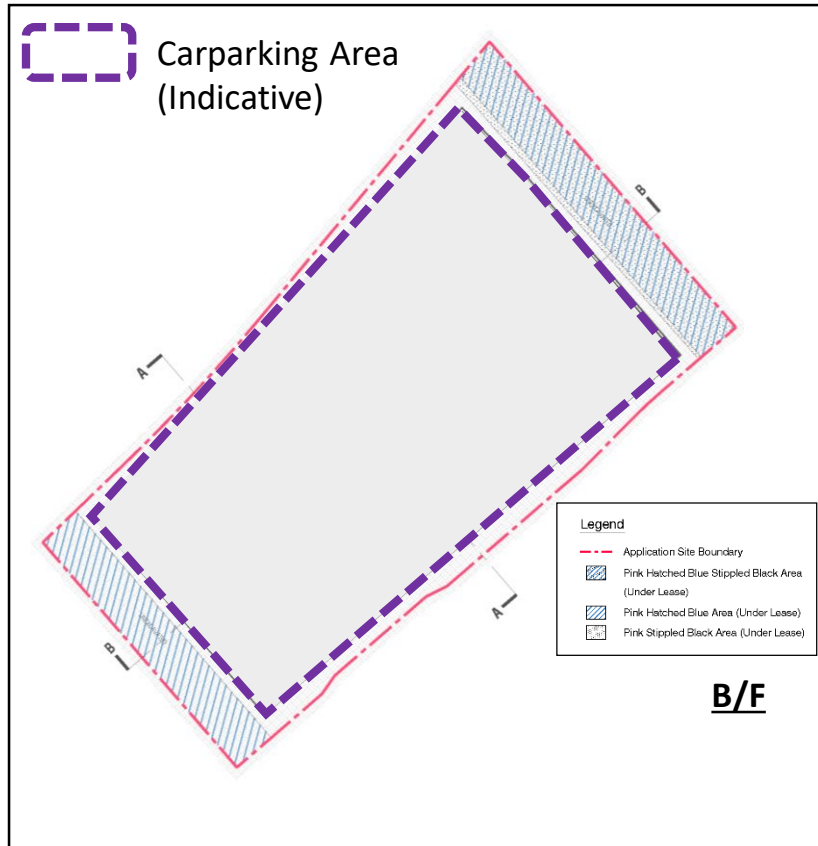
- In accordance with the requirement of the Sustainable Building Design Guidelines (PNAP APP-152), the overall minimum site coverage of greenery required for the entire Application Site is 20% (i.e. area within the red line).

- 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.

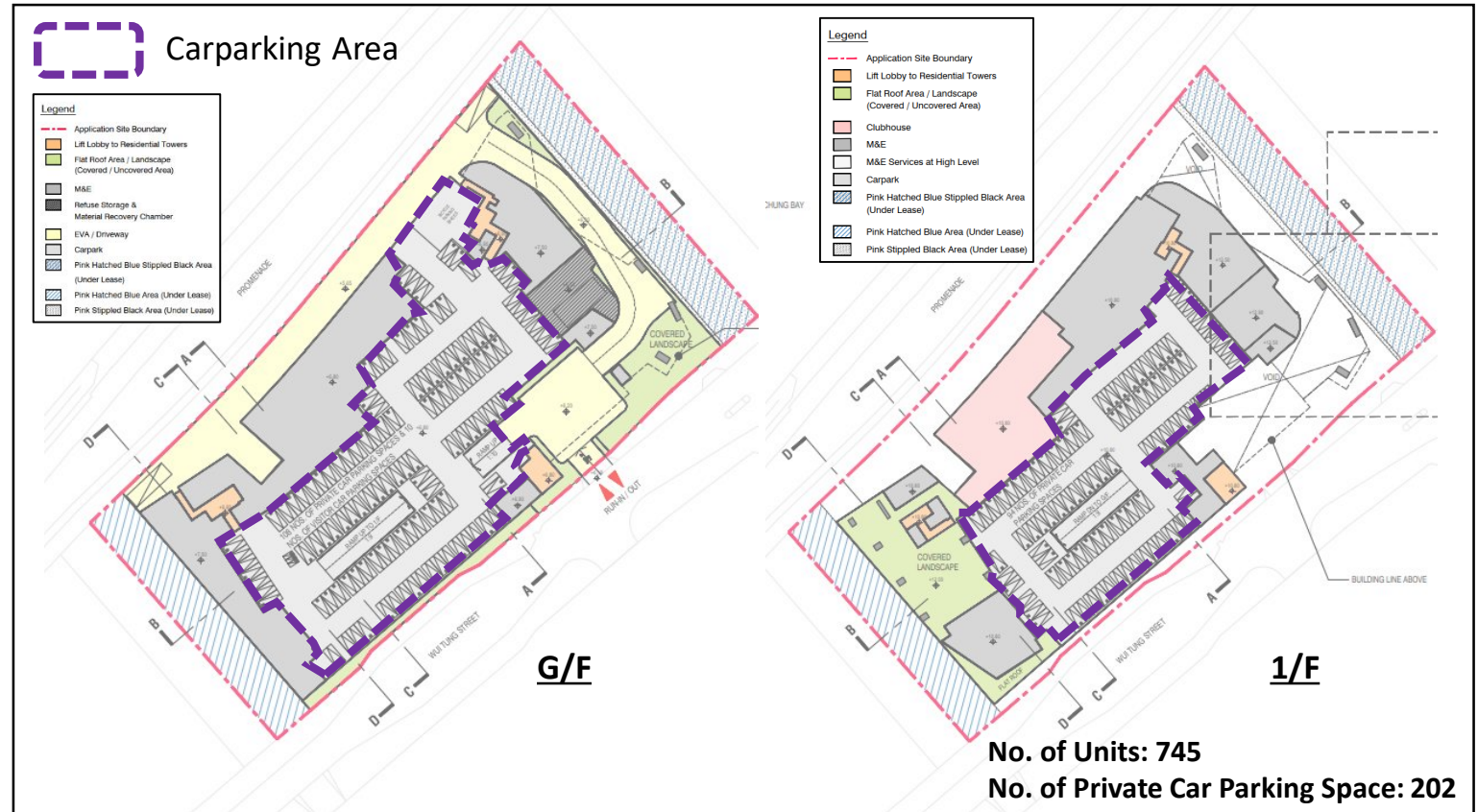
2. JUSTIFICATIONS FOR CAR PARK ARRANGEMENT

Figure 5: Carparking Extent Being Minimal to Minimise Building Bulk

Indicative Basement Carpark Design Approach



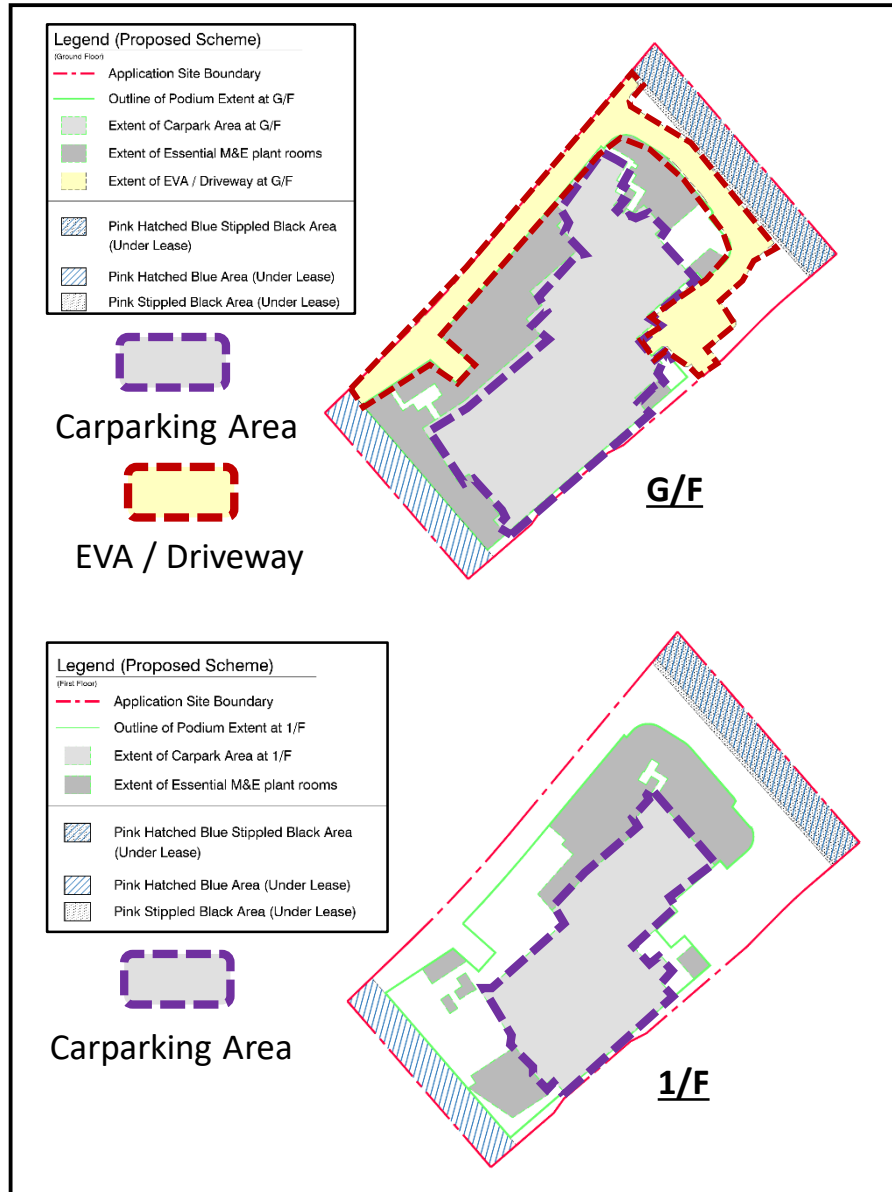
Proposed Scheme (Detailed G/F & 1/F Plan) (Indicative Only)



- 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

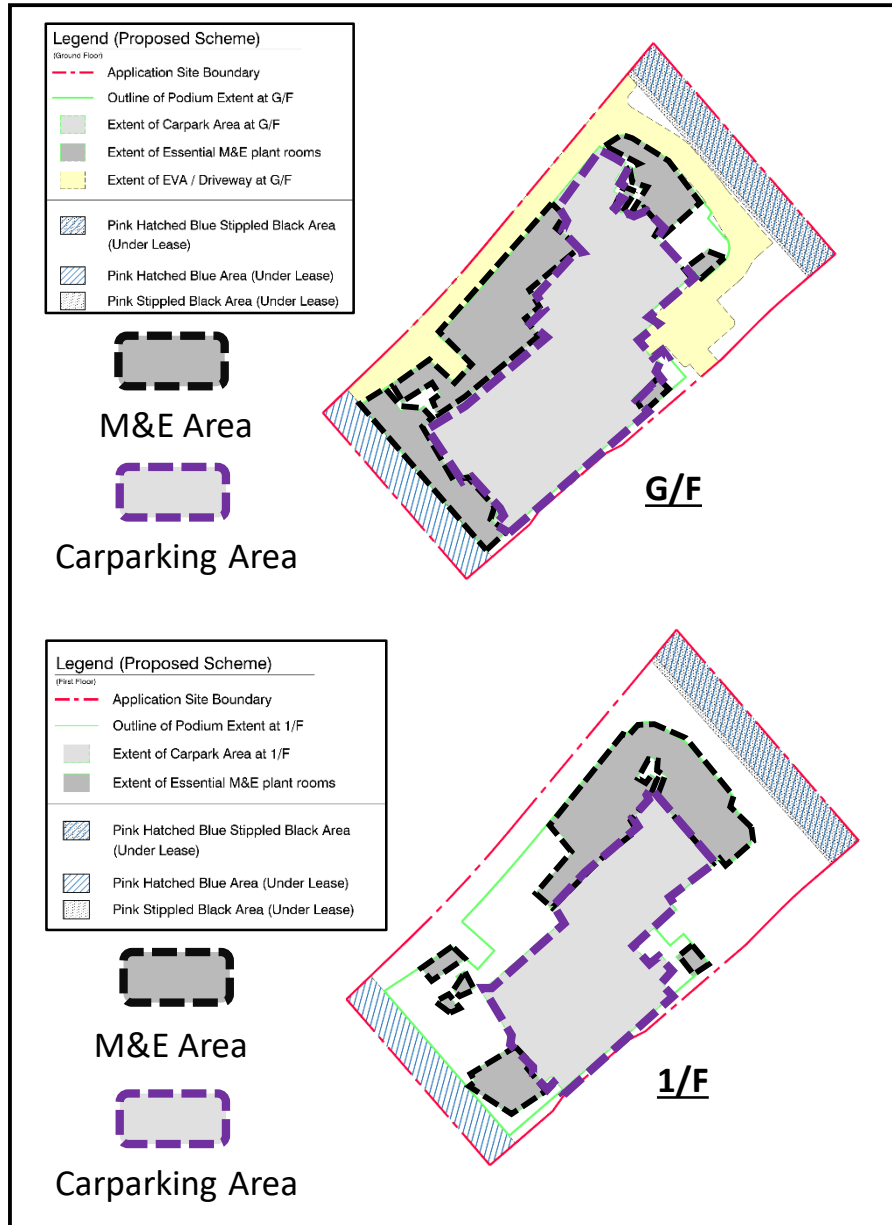
Proposed Scheme



- 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

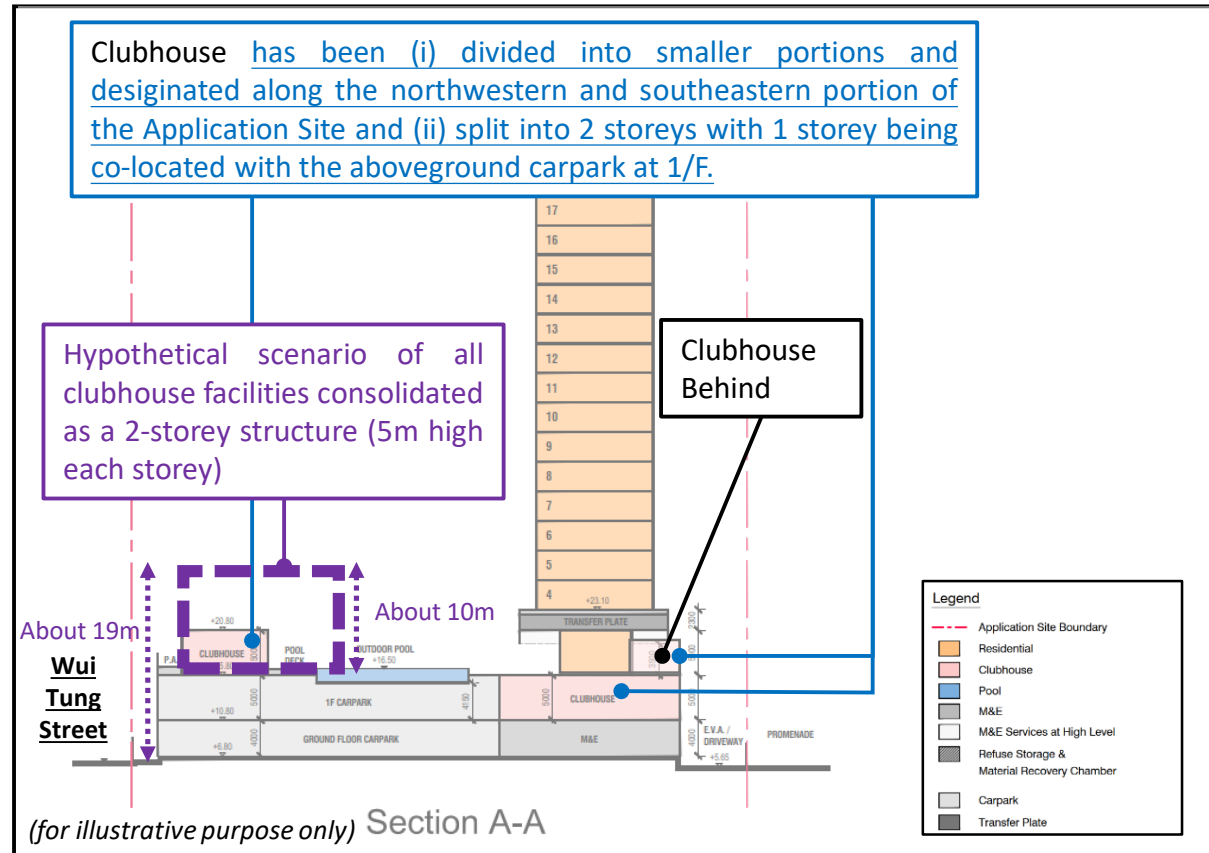


- The M&E plant room areas within the podium of the Proposed Scheme include [essential services which serve the entire development in addition to the carpark](#). To minimize building bulk of the development, the major M&E facilities are accommodated in the podium together with the carparking areas.
- 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

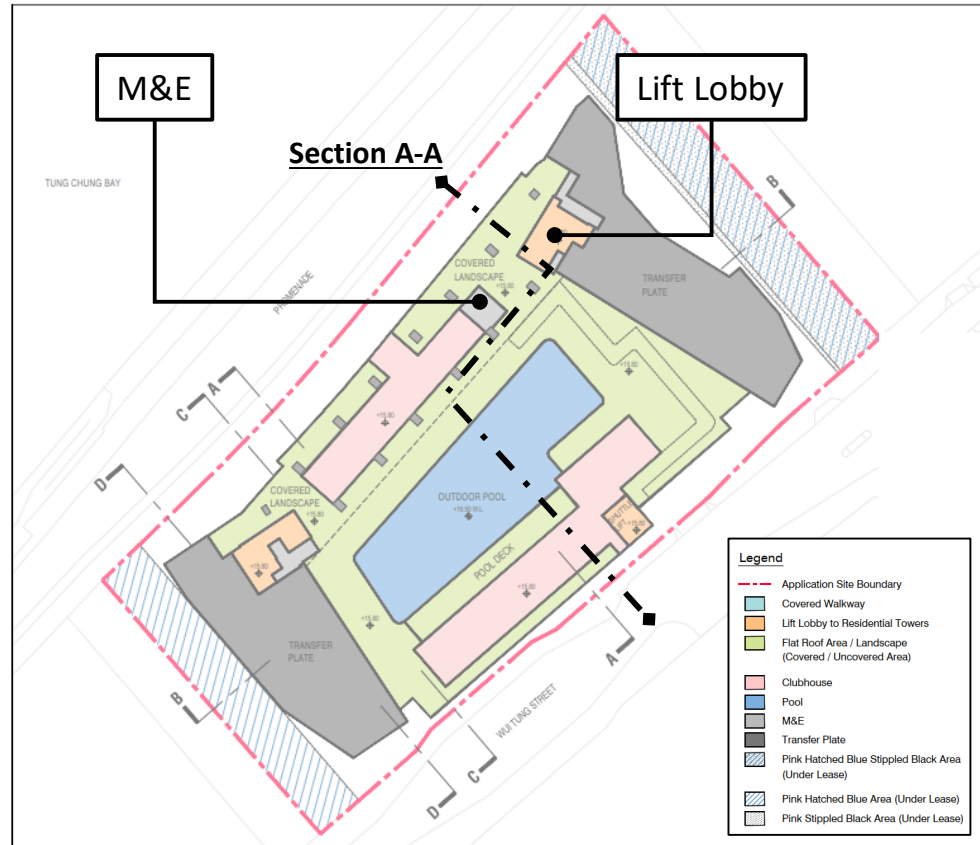
Proposed Scheme



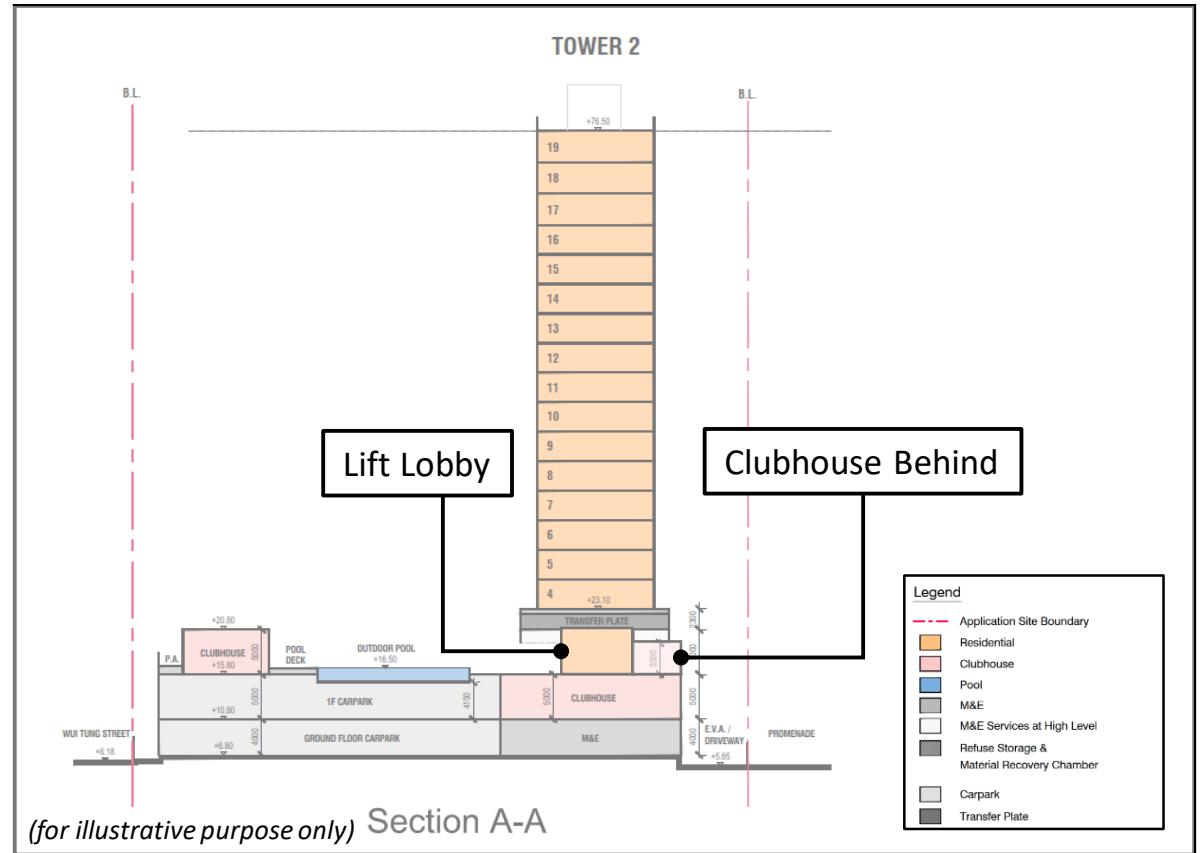
- Hypothetically, if the clubhouse facilities are consolidated as a 2 storey structure above podium, the overall height of the podium facing Wui Tung Street would become overly excessive (i.e. about 19m) after incorporating the aboveground carpark.
- The bulk of the clubhouse has been (i) divided into 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)

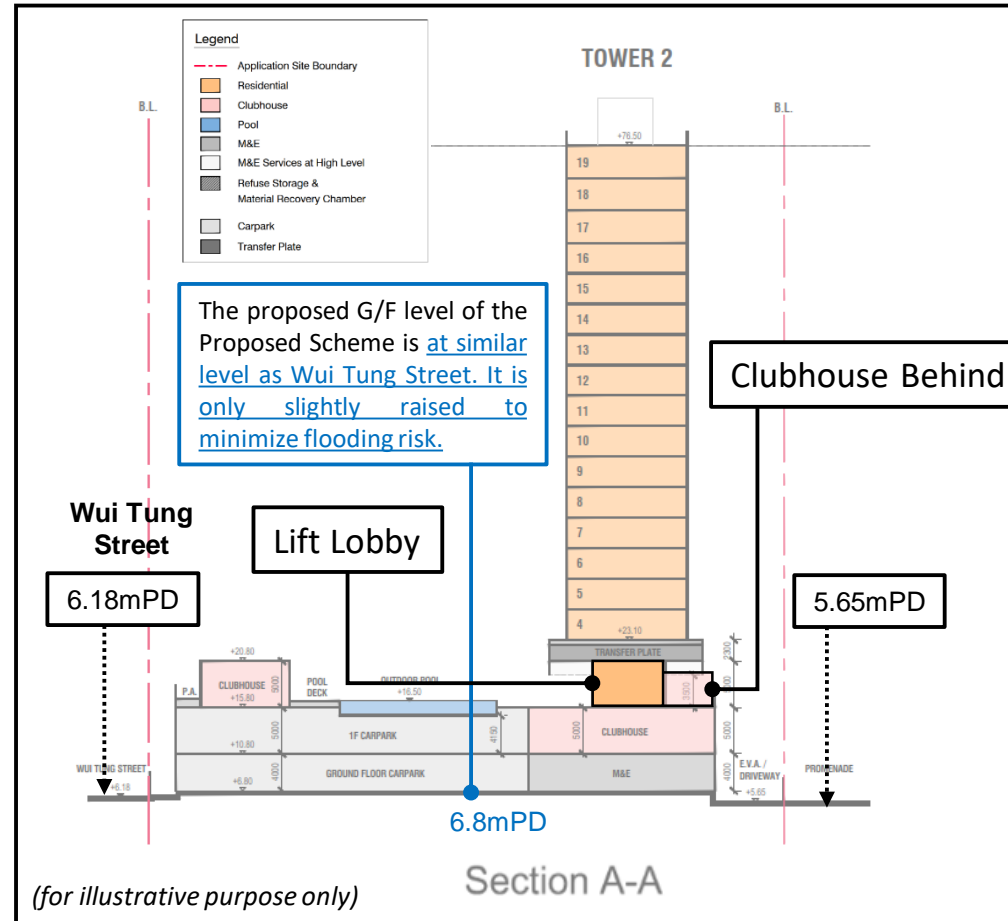


- Rather than dedicating 2/F solely for clubhouse, [clubhouse facilities are being co-located with the necessary lift lobbies and E&M facilities](#), as shown in the above 2/F Plan and Section A-A.
- The building height and building bulk has been minimized by [avoiding further stacking the clubhouse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

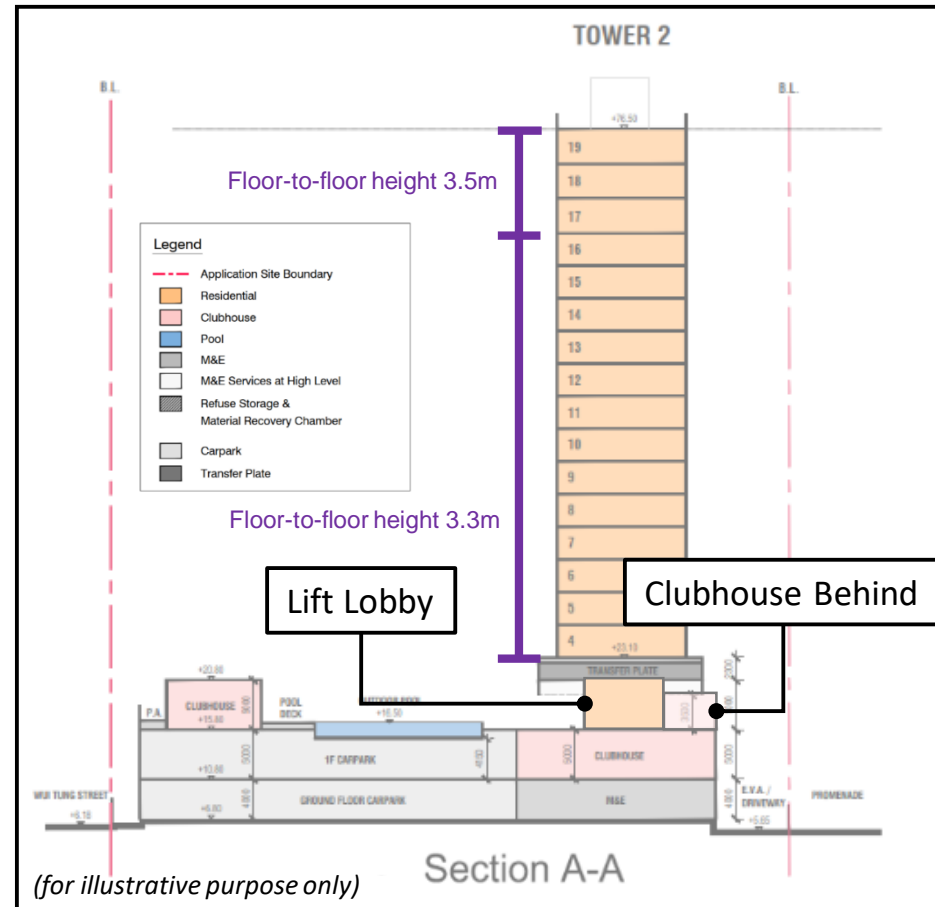
Proposed Scheme



- 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 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.](#)

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

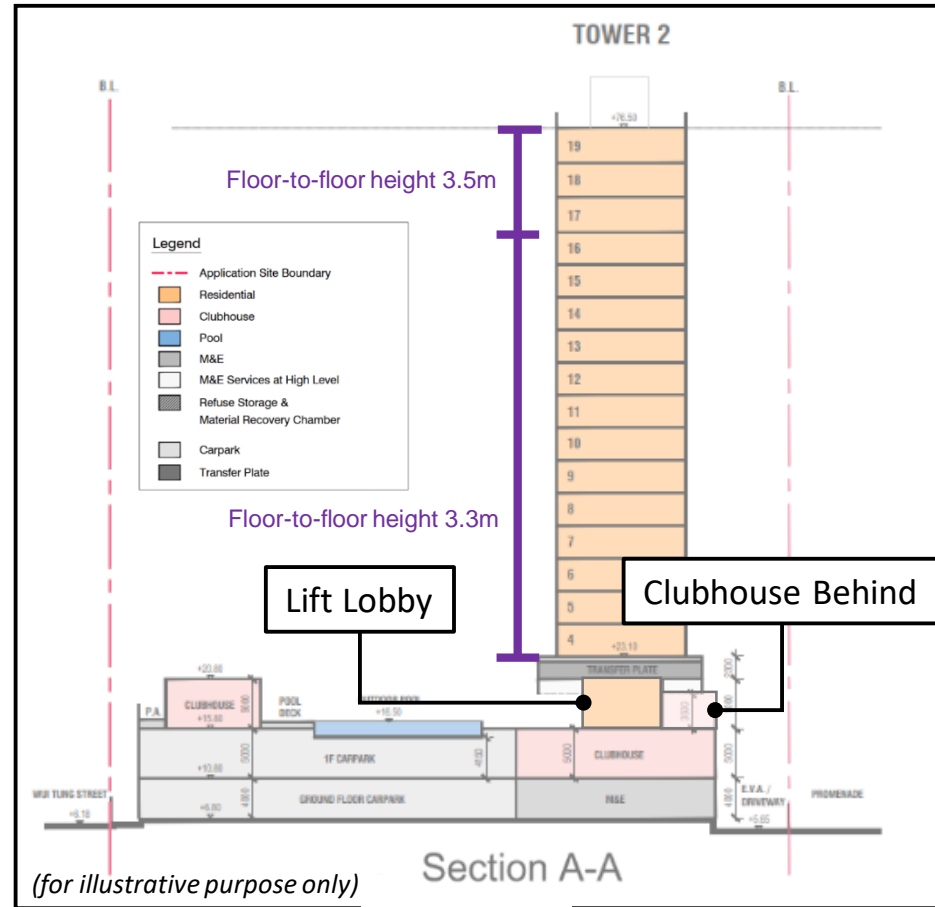
Proposed Scheme



- 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.

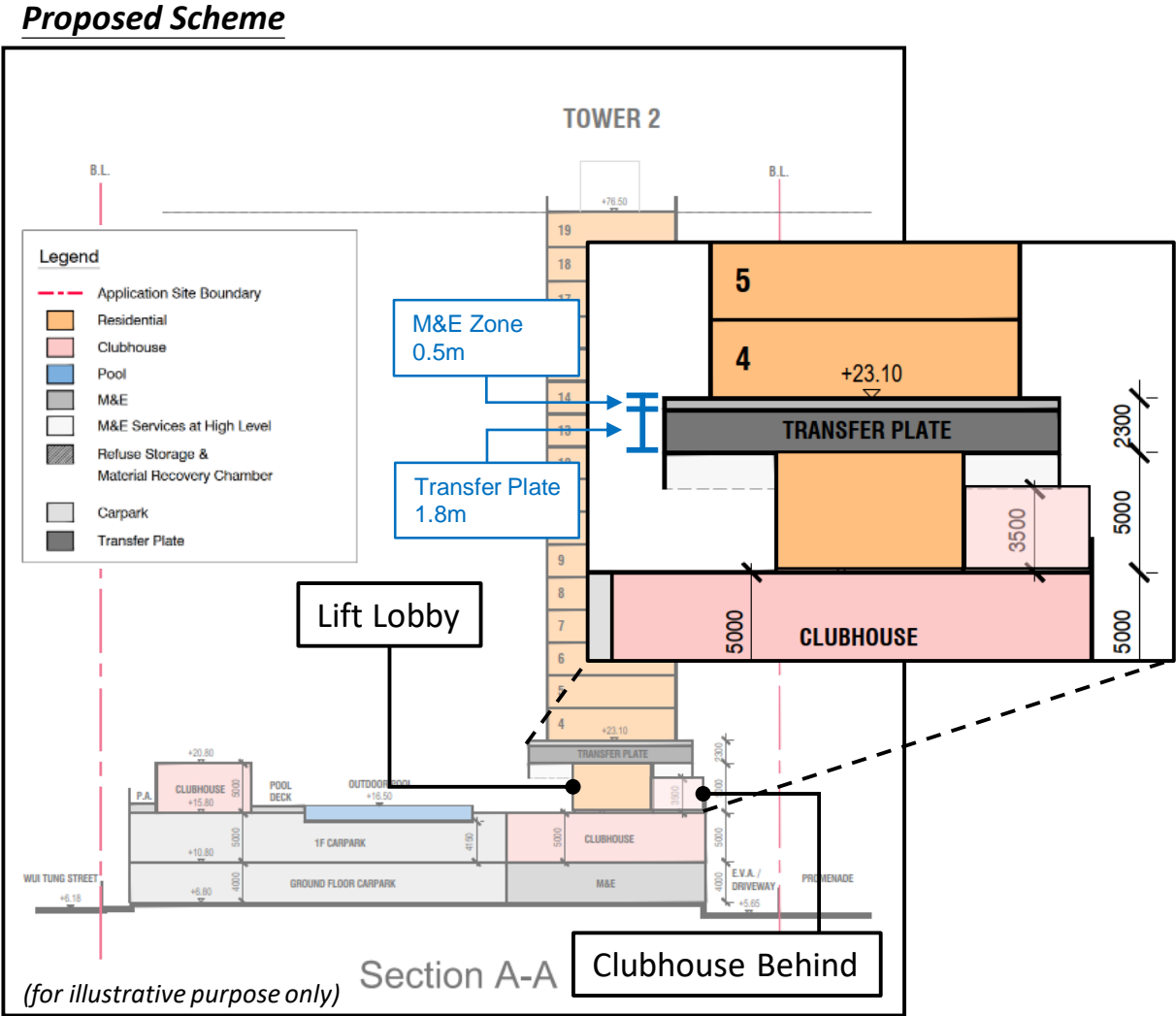
Figure 12: Proposed Residential Floor to Floor Height Being Reasonable

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](#).

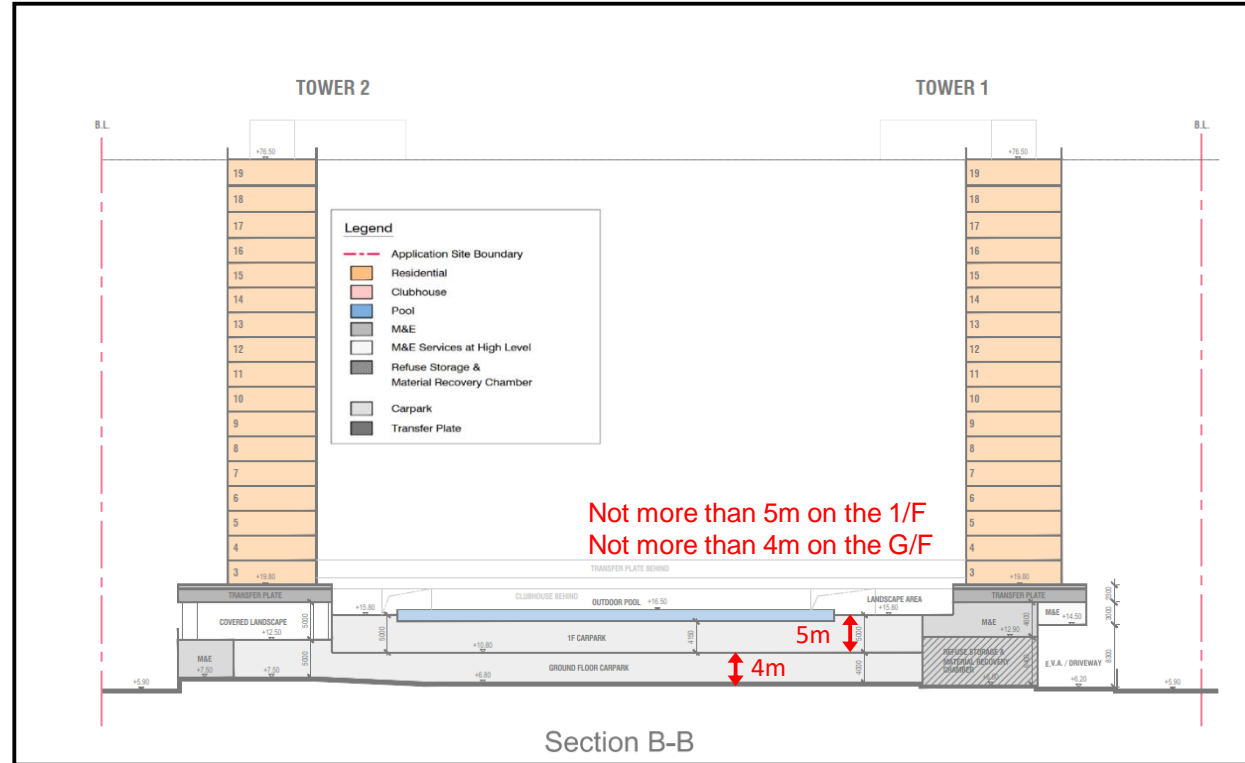
Figure 13: Proposed Building Height for Transfer Plate and M&E Zone Being Reasonable



- The Proposed Scheme [height for transfer plate \(i.e. 1.8m\)](#) and [M&E Zone \(i.e. 0.5m\)](#) (i.e. a combined height of 2.3m) are reasonable.

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.](#)