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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.**

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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.**

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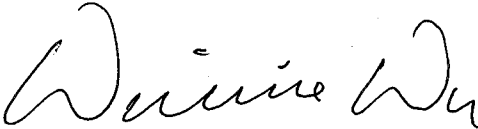
Enhancements Made under the Proposed Scheme as Compared with the Latest Approved GBP (February 2026)

- 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 [REDACTED]

Yours faithfully
for Llewelyn-Davies Hong Kong Ltd



Winnie Wu
Planning Director

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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>Site Formation Level</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><u>Site Level Rationalized to Match with Street Level</u> 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><u>Minimising Flood Risk</u> 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><u>In Line with Government’s Policy Intent of Aboveground Carpark</u> 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>Podium Levels</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><u>Higher Headroom for Safety and Ventilation</u> 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><u>Promoting Elderly-Friendly Building Design</u> 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
Residential Floors	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><u>Better Indoor Living Environment</u> 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><u>Facilitate Higher Standard of BEAM Plus</u> 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><u>Keep Up with Prevailing Market Trend</u> 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><u>Not Excessive and In Line with PNAP APP-5</u> 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>