

PLANNING LIMITED
規劃顧問有限公司

By Email

Our Ref: [REDACTED]

27 May 2026

Secretary, Town Planning Board
15/F, North Point Government Offices
333 Java Road
North Point

Dear Sir/Madam,

**Proposed Minor Relaxation of Building Height Restriction
for Permitted Flat in "Residential (Group A) 1" Zone,
Lot Nos. 2268 S.A, 2268 RP, 2269RP, 2270 RP, 2271, 2272, 2273 S.A RP, 2273 S.B ss.2,
2273 S.B ss.3, 2273 S.B ss.4, 2273 S.B RP, 2273 S.C ss.2, 2274, 2275 in DD120 and
Adjoining Government Land, Kung Um Road, Yuen Long, N.T.
(Planning Application No. A/YL/331)
Further Information No. 1**

Reference is made to the captioned S16 Planning Application which is scheduled for consideration by the Town Planning Board at its meeting on 5 June 2026 and the comments received from various Government Departments via emails from Tuen Mun and Yuen Long West District Planning Office during period from 11 to 15 May 2026.

To address the comments from relevant Government Departments, further information ("FI") has been prepared. This FI consists of:

Responses-to-Comments Table
Annex A – Updated Supporting Planning Statement
Annex B – Replacement Pages of Application Form
Annex C – Proposed Design Measures Plan

Should you have any queries in relation to the above and attached, please do not hesitate to contact Mr Wilson Man [REDACTED] or the undersigned [REDACTED]

Thank you for your kind attention.

Yours faithfully
For and on behalf of
KTA PLANNING LIMITED

A handwritten signature in black ink, appearing to read 'Kitty Wong', with a long horizontal flourish extending to the right.

Kitty Wong

Encl. Responses-to-Comments Table with Annexes A to C

cc. DPO/TM&YL – Ms Zoe Lau/ Ms Carmen Cheung/ Mr Kevin Lam (by email)
the Applicant & Team

PL/KWWM/vy



**Proposed Minor Relaxation of Building Height Restriction for Permitted Flat in
“Residential (Group A) 1” Zone at Various Lots in D.D. 120 and
Adjoining Government Land, Kung Um Road, Yuen Long
(Planning Application No. A/YL/331)**

Comments				Responses
Comments from District Planning Officer / Tuen Mun & Yuen Long West, Planning Department (received on 11 May 2026) (Contact: Ms Carmen CHEUNG; Tel.: 2158 6333)				
(i) Please submit drawing(s) (and further written explanation where applicable) showing the proposed design measures as indicated in the supplementary planning statement section 3.2.				The proposed design measures have been included in the updated Supporting Planning Statement.
(ii) When compared with the OZP conforming scheme, it is observed that the floor-to-floor height (FTFH) of G/F and 1/F of Tower 2 has increased from 5m to 6.25m, while the FTFH of G/F of Tower 1 has increased from 5m to 7.5m, hence an overall increase of 2.5m in absolute building height for both towers. Please provide justifications on why an increase of 1.25m each at G/F and 1/F of Tower 2, and 2.5m at G/F of Tower 1 is required in the proposed scheme.				Upon further review, the FTFH of G/F and 1/F of Tower 2 for the Proposed Scheme has been adjusted from 6.25m to 5m. For Tower 1, the increase in FTFH of G/F from 5m to 7.5m is required to accommodate the additional level of carpark (each with a FTFH of 3.75m). Upon the adjustment, the building height (at main roof) of the Proposed Scheme would be reduced to 92.45mPD, which is the same as that of the Conforming Scheme (Appendix 1 refers).
(iii) With reference to the comments from Buildings Department below (Please refer to P.4-5), a general building plan (GBP) submission has been approved by the Building Authority on 2.4.2026. The following differences between the GBP scheme and proposed scheme are observed:				The initial GBP submission approved in April adhered strictly to the 25-storey limit stipulated under the Outline Zoning Plan (OZP). In anticipation of a planning application for a minor relaxation of the building height restriction, which is currently in progress, the approved set of GBPs has adopted a conservative baseline scheme designed with no basement car park, one fewer storey of typical floor and a reduced total GFA, so that it ensures statutory compliance in the interim while preserving the flexibility to optimize the development’s full potential once the planning approval is secured.
	OZP Conforming Scheme	Proposed Scheme under s.16	Approved GBP on 2.4.2026	
Site Area (m ²)	8,235			
Domestic PR	5	5	4.78	
GFA (m ²)	41,175	41,175	39,403.181	
Building height (main roof)	92.45 mPD	94.95 mPD	89.3 mPD	
No. of storeys	25	26	25	
No. units	1,035	1,035	1,012	
Average unit size (m ²)	39.8	39.8	--	
				The FTFH of the podium of the Approved GBP followed a nominal FTFH height that did not fully taken account for the spatial demands of project-specific requirement on structural design and mechanical, electrical and plumbing (“MEP”) systems. Upon further technical coordination amidst the site constraints, an increase in FTFH is essential for ensure adequate clearance for structural elements, MEP systems and fire safety provisions while realising the full development potential of the site.

Comments				Responses
No. of carparking spaces				
- Private Cars	188	188	178	
- Motorcycle	13	13	14	
- L/UL Bay	2	2	2	
FTFH	- G/F to 1/F: 5m - Flat: 3.15m	Tower 1: - G/F: 3.75m to 7.5m - M/F: 3.75m - 1/F: 5m Tower 2: - G/F to M/F: 3.75m to 6.25m - 1/F: 5m to 6.25m - Flat: 3.15m	Tower 1: - LG/F: 3.75m - M/F: 2.75m Tower 2: - G/F: 5m - 1/F: 5m - Flat: 3.15m	
<p>The approved GBP is for residential development consisting two 22-storey residential towers (i.e. Tower 1 and Tower 2) above a two (for Tower 2) to three-storeys podium (for Tower 1) without basement carpark/floor (i.e. a 25-storeys building for Tower 1 and a 24-storeys building for Tower 2). The three-storeys podium also consists of Mezzanine floor with FTFH of 2.75m with similar floor layout design. As the GBP was approved on the basis of no basement carpark while complying with the statutory planning restrictions at a lower building height of 89.3mPD, the applicant should provide full justifications on why minor relaxation of building height restriction is required under the current proposed scheme and in addition, increase in FTFH of podium levels.</p>				
<p>Comments from the Chief Estate Surveyor / Lands Supply, Lands Department (received on 11 May 2026) (Contact Person: Ms Carey LIN; Tel.: 2155 2438)</p>				
(i)	The application site (“the Site”) comprises 14 old scheduled lots held under Block Government Lease demised for agricultural use and the adjoining Government land. A land exchange application was			Noted.

Comments	Responses
submitted by the land owner for implementing the proposed residential development at the Site. Such land exchange application would be dealt with by Lands Department acting in the capacity as the landlord at its sole discretion. If the land exchange application is approved by Lands Department, it would be subject to such terms and conditions including, among others, the payment of premium and administrative fee as may be imposed by Lands Department.	
(ii) Noting that aboveground parking spaces are proposed to be provided in the Site, Lands Department would follow the prevailing practice for “Gross Floor Area Exemption Arrangement for Aboveground Parking Spaces in Private Developments” under Lands Administration Office Practice Note No. 9/2025 to deal with the GFA exemption arrangement under lease.	Noted.
(iii) As regards the proposed carparking and loading and unloading provisions in the subject s.16 application, Lands Department would reserve comments on their compliance under lease for the proposed land exchange due to the absence of the flat mix and the GFA distribution among domestic GFA and non-domestic GFA (if any) which will be available at the detailed design stage.	Noted.
Comments from the Chief Engineer / Mainland North, Drainage Services Department (received on 11 May 2026) (Contact Person: Mr LOU Tai-yeong; Tel.: 3965 8929)	
(i) No objection in principle to the proposed application. The development should neither obstruct overland flow nor adversely affect existing natural streams, village drains, ditches and the adjacent areas, etc.	Noted.
Comments from Director of Fire Services (received on 11 May 2026) (Contact Person: Mr WONG Cheuk-kei; Tel.: 2733 7737)	
(i) 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.
(ii) 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.
Comments from the Chief Engineer / Construction, Water Supplies Department (received on 11 May 2026) (Contact Person: Mr. Jeffery HO; Tel.: 2152 5740)	

Comments	Responses
(i) No objection to the application.	Noted.
(ii) Existing water mains will be affected as shown on the plan (Annex II). The cost of any necessary diversion shall be borne by the proposed development.	Noted.
(iii) In case it is not feasible to divert the affected water mains, a waterworks reserve within 1.5 metres from the center line of the water main shall be provided to Water Supplies Department. No structure shall be built or materials stored within this waterworks reserve. Free access shall be made available at all times for staff of the Director of Water Supplies or their contractor to carry out construction, inspection, operation, maintenance and repair works.	Noted.
(iv) No trees or shrubs with penetrating roots may be planted within the Waterworks Reserve or in the vicinity of the water main shown on the plan.	Noted.
(v) Government shall not be liable to any damage whatsoever and howsoever caused arising from burst or leakage of the public water mains within and in close vicinity of the site.	Noted.
Comments from the Chief Building Surveyor / New Territories West, Buildings Department (received on 11 May 2026) (Contact Person: Ms Yolly LAU; Tel.: 2626 1435)	
(i) According to our record, there is a general building plan approval granted by the Building Authority (BA) on 2 April 2026 at the Site.	Noted.
(ii) The site shall be provided with means of obtaining access thereto from a street and emergency vehicular access in accordance with Regulations 5 and 41D of the Building (Planning) Regulations (B(P)R) respectively.	Noted.
(iii) The site abuts on a specified street (Kung Um Road) of not less than 4.5m wide. Its permitted development intensity shall be determined under the First Schedule of the B(P)R at the building plan submission stage.	Noted.
(iv) For unauthorized building works (UBW) erected on leased land, enforcement action may be taken by the Buildings Department to effect their removal in accordance with the prevailing enforcement policy against UBW as and when necessary. The granting of any planning approval should not be construed as an acceptance of any existing building works or UBW on the application site under the Buildings Ordinance (BO).	Noted.

Comments	Responses
(v) If the proposed plot ratio is based on the assumption that gross floor area (GPA) exemption will be granted for green/amenity features and non-mandatory/non-essential plant rooms, etc., the pre-requisites in Practice Note for Authorized Persons, Registered Structural Engineers and Registered Geotechnical Engineers (PNAP) APP-151 and APP-152 should be complied with.	Noted.
(vi) If the covered carpark & loading and unloading spaces including those provided above ground and proposed to be disregarded from GPA calculation under the Regulation 23(3) of the B(P)R shall be subject to the requirements laid down in Practice Notes for Authorized Persons, Registered Structural Engineers and Registered Geotechnical Engineers (PNAP) APP-2 and PNAP APP-111.	Noted.
(vii) The ratio of parking spaces for disabled persons specified therein should comply with the ratio of accessible parking spaces required under regulation 72 of B(P)R and Division 3 of the Design Manual: Barrier Free Access 2008.	Noted.
(viii) Any temporary shelters or converted containers for office, storage, washroom or other uses are considered as temporary buildings are subject to the control of Part VII of the B(P)R.	Noted.
(ix) Detailed checking under the BO will be carried out at building plan submission stage.	Noted.
Comments from the Director of Electrical and Mechanical Services (received on 11 May 2026) (Contact Person: Mr Tony TSE; Tel.: 3757 6231)	
(i) Please note that there is a high pressure underground town gas transmission pipeline in the vicinity of the proposed residential development. For any development that will result in a significant increase in population in the vicinity of the said gas installations, a quantitative risk assessment would be required from the project proponent or its consultant to assess the potential risks associated with the gas installation.	Please note that the current Planning Application only involves minor relaxation of building height restriction from 25 to 26 storeys to accommodate the relocation of basement carpark to above-ground. There is no change to the zoning (i.e. "Residential (Group A)1") or maximum domestic plot ratio (i.e. 5.0) of the Site. As the Site is planned for a medium-rise residential development, the Proposed Development would not result in any increase in population. Notwithstanding the above, a Quantitative Risk Assessment (QRA) would be conducted during the detailed design stage, if required, to ensure the compliance of relevant requirements.
(ii) The applicant/consultant/works contractor shall liaise with the Hong Kong and China Gas Company Limited in respect of the exact	Please refer to the response above.

Comments	Responses						
<p>locations of existing and planned gas pipes/gas installations in the vicinity of the application site and any required minimum set back distance away from them during the design and construction stages of residential development.</p>							
<p>(iii) The applicant is required to observe the following requirements of the Electrical and Mechanical Services Department's Publications via the following web-link for reference.</p> <table border="1" data-bbox="282 448 999 730"> <thead> <tr> <th data-bbox="282 448 622 480">Publications</th> <th data-bbox="622 448 999 480">Web Link</th> </tr> </thead> <tbody> <tr> <td data-bbox="282 480 622 635">Guidance Note on Quantitative Risk Assessment Study for High Pressure Town Gas Installations in Hong Kong</td> <td data-bbox="622 480 999 635">https://www.emsd.gov.hk/filemanager/en/content_287/GN_Qntve_Rsk_Asmnt_Study_Hgh_Prsre_Twn_Gas_Instltns_inHK.pdf</td> </tr> <tr> <td data-bbox="282 635 622 730">Code of Practice on "Avoidance of Damage to Gas Pipes" 2nd Edition</td> <td data-bbox="622 635 999 730">https://www.emsd.gov.hk/filemanager/en/content_286/CoP_gas_pipes_2nd_(Eng).pdf</td> </tr> </tbody> </table>	Publications	Web Link	Guidance Note on Quantitative Risk Assessment Study for High Pressure Town Gas Installations in Hong Kong	https://www.emsd.gov.hk/filemanager/en/content_287/GN_Qntve_Rsk_Asmnt_Study_Hgh_Prsre_Twn_Gas_Instltns_inHK.pdf	Code of Practice on "Avoidance of Damage to Gas Pipes" 2 nd Edition	https://www.emsd.gov.hk/filemanager/en/content_286/CoP_gas_pipes_2nd_(Eng).pdf	<p>Please refer to the response above.</p>
Publications	Web Link						
Guidance Note on Quantitative Risk Assessment Study for High Pressure Town Gas Installations in Hong Kong	https://www.emsd.gov.hk/filemanager/en/content_287/GN_Qntve_Rsk_Asmnt_Study_Hgh_Prsre_Twn_Gas_Instltns_inHK.pdf						
Code of Practice on "Avoidance of Damage to Gas Pipes" 2 nd Edition	https://www.emsd.gov.hk/filemanager/en/content_286/CoP_gas_pipes_2nd_(Eng).pdf						
<p>Comments from the Director of Food and Environmental Hygiene (received on 11 May 2026) (Contact Person: Mr Raymond CHAN; Tel.: 3141 1231)</p>							
<p>(i) No Food and Environmental Hygiene Department's (FEHD) facilities should be affected.</p>	<p>Noted.</p>						
<p>(ii) Proper licence / permit issued by this Department is required if there is any food business / catering service / activities regulated by the Director of Food and Environmental Hygiene (DFEH) under the Public Health and Municipal Services Ordinance (Cap. 132) and other relevant legislation for the public. In accordance with Section 4 of Food Business Regulation, Cap.132X, the expression 'food business' means any trade or business for the purpose of which any person engages in the handling of food or food is sold by means of a vending machine but does not include any canteen in work place (other than a factory canteen referred to in section 31) for the use exclusively of the persons employed in the work place. As such, a staff canteen that exclusively use by the staff members of that working place does not require a food business licence from this department. However, if the said canteen provided foods to the outsiders with payment, a food business licence is required. Pursuant to section 4 of the Food Business Regulation (Cap. 132X), the expression of "food business" does not include any club. However, permission to sell restricted</p>	<p>Noted.</p>						

Comments	Responses
<p>foods, such as milk, frozen confections, non-bottled drinks, cut fruit, sushi and sashimi etc., specified in Schedule 2 to the Food Business Regulation, Cap. 132X, is still required.</p>	
<p>(iii) Proper licence issued by this Department is required if related place of entertainment is involved. Any person who desires to keep or use any place of public entertainment for example a theatre and cinema or a place, building, erection or structure, whether temporary or permanent, on one occasion or more, capable of accommodating the public presenting or carrying on public entertainment within Places of Public entertainment (PPE) Ordinance (Cap. 172) and its subsidiary legislation, such as a concert, opera, ballet, stage performance or other musical, dramatic or theatrical entertainment, cinematograph or laser projection display, a circus, a lecture or story-telling, an exhibition of any 1 or more of the following, namely, pictures, photographs, books, manuscripts or other documents or other things, a sporting exhibition or contest, a bazaar, a dance part or an amusement ride and mechanical device which is designed for amusement, a Place of Public Entertainment Licence (or Temporary Place of Public Entertainment Licence) should be obtained from FEHD whatever the general public is admitted with or without payment.</p>	<p>Noted.</p>
<p>(iv) A swimming pool licence must be obtained from FEHD for any artificially constructed pool used for swimming or bathing and to which the public have access (whether on payment or otherwise) or which is operated by any club, institution, association or other organization. A swimming pool licence is not required for any swimming pool which serves not more than 20 residential units and to which the public have no access.</p>	<p>Noted.</p>
<p>(v) There should be no encroachment on the public place and no environmental nuisance should be generated to the surroundings. Its state should not be a nuisance or injurious or dangerous to health and surrounding environment. Also, for any waste generated from such activities/ operation, the applicant should arrange disposal properly at their own expenses.</p>	<p>Noted.</p>
<p>(vi) If provision of cleansing service for new public roads, streets, cycle tracks, footpaths, paved areas etc, is required, FEHD should be separately consulted. Prior consent from FEHD must be obtained and sufficient amount of recurrent cost may have to be provided to us.</p>	<p>Noted.</p>

Comments	Responses
(vii) If domestic waste collection service of FEHD is required in future, prior comments from this Department on the waste collection plan, including the accessibility and maneuverability of RCV to RCP, should be sought.	Noted.
Comments from the Chief Town Planner / Urban Design and Landscape, Planning Department (received on 11 May 2026) (Contact Person: Mr Jason KO; Tel.: 3565 3941)	
<p>On the Visual Appraisal (VA), some observations/ comments were provided below:</p> <p>Photomontage</p> <p>(i) VP1 – the planned residential development (about +89.75 mPD) (i.e. Y/YL/20) is located behind the Emerald Green, which should not be visible from this viewpoint.</p>	Noted. The Visual Appraisal has been updated.
Comments from District Planning Officer / Tuen Mun & Yuen Long West, Planning Department (received on 15 May 2026) (Contact: Ms Carmen CHEUNG; Tel.: 2158 6333)	
<p>We have the following comments on the Master Layout Plan (MLP):</p> <p>(i) It is observed that the pink hatched blue area and pink hatched blue stripped black area on the MLP extend to Park Signature and appear to affect the internal access road or local track road. Please clarify the purpose, the use and/or arrangement of the aforementioned area.</p>	Please be advised the Pink Hatched Blue Area (PHBA) on the MLP are demarcated in strict accordance with the latest draft lease plan of the proposed land exchange. No building or structure or support for building or structure shall be erected on, over, under above, below or within the PHBA.
<p>(ii) Please provide further details on the edged pecked blue area for deferred possession. The applicant should also clarify the arrangement of the proposed bicycle parking spaces provision.</p>	As per the draft lease conditions of the proposed land exchange, the project proponent will be given the possession of the area demarcated edged pecked blue in the MLP not later than 1 January 2029. Open bicycle parking and fence wall / fencing on the boundary will be formed / erected, prior to completion of the development.
<p>(iii) Please clarify the purpose of indicating the centreline of the street on Kung Um Road.</p>	The centreline of the street is indicated to demonstrate compliance with the requirement of Building Setback under Sustainable Building Design (SBD) Guidelines.

Public Comments received During the 3-week Statutory Public Consultation Period

Comments	Responses
<p><u>Fire Hazard Concerns</u></p> <ul style="list-style-type: none"> The proposed buildings are too close to the towers of the existing residential developments which may pose fire hazard concerns. Close proximity of the new buildings to existing residential units could make emergency vehicle access and fire rescue more challenging. 	<p>To minimise the impact to the adjacent residential neighbourhood (such as La Grove and Park Signature), the tower blocks have been purposely designed to maximize building setbacks from surrounding residential blocks. The Proposed Development will strictly comply with all relevant statutory fire safety regulations and the Buildings Ordinance. EVA would be provided in accordance with the Code of Practice for Means of Access for Firefighting and Rescue.</p>
<p><u>Traffic Concerns</u></p> <ul style="list-style-type: none"> Kung Um Road (公庵路) and Shap Pat Heung Road (十八鄉路) are already heavily congested during peak hours. Additional residents and vehicles would overwhelm the existing road network and there are insufficient improvement measures from the proposal. The area lacks a public transport terminal, has only a few bus routes and is not served by the MTR. Adding over 1,000 new flats will dramatically increase the number of vehicles and residents, further straining the already inadequate transport infrastructure. 	<p>A Traffic Impact Assessment was conducted in support of the Land Exchange Application and the results indicated there would not be any adverse impact to the surrounding road network due to the Proposed Development.</p> <p>Public transport demand was also assessed. The current public transport provisions would meet the need of the increased population.</p>
<p><u>Inadequate Community Facilities</u></p> <ul style="list-style-type: none"> There are already shortage in parking spaces, public space and community service in the area. The increase in population will further deteriorate the living quality. 	<p>The Site is zoned “Residential (Group A) 1” which is intended for high-density residential development. As there is no increase in the total domestic plot ratio, it is anticipated that the Proposed Development would not introduce additional planned population to the area.</p> <p>Furthermore, the internal transport facilities, including 188 private car parking spaces, 13 motorcycle parking spaces, and 2 loading/unloading bays will meet the parking need of the future residents without placing any additional burden on the existing parking resources of the surrounding neighbourhood.</p>
<p><u>Air Ventilation Concerns</u></p> <ul style="list-style-type: none"> Potential “wall effect” from proposed high-rise buildings and reduce natural wind flow and affect air circulation of the surrounding residential developments. 	<p>The layout of the Proposed Development has been carefully designed to avoid “wall effect”. The scheme comprises two residential towers with a separation of approximately 30m. which would facilitate wind penetration,</p>

Comments	Responses
	enhance visual permeability, and preserve natural air circulation for surrounding developments.
<p><u>Obstruction of Natural Lighting and View</u></p> <ul style="list-style-type: none"> The relaxation in building height restriction would affect the natural lighting and view of existing residential development. The proposed buildings could cast shadows on existing residential units, potentially reducing natural sunlight and affecting living comfort 	With the 30m wide building separation and building setback from the surrounding residential blocks, the disposition of the towers has purposely minimized the obstruction of views and natural lighting of the adjacent residential developments.
<p><u>Incompatibility with Adjacent Developments</u></p> <ul style="list-style-type: none"> The adjacent area are mainly low-to-medium density development and the approval of the Planning Application for minor relaxation of building height restriction would lead to an incompatible development with the surrounding context. 	The Application Site is located within the "Residential (Group A) 1" "R(A)1", which is intended for high-density residential development. The site is immediately bounded by existing medium-rise developments within the same "R(A)1" zone, including La Grove and Park Signature. Although the Planning Application involves minor relaxation of building height restriction from 25 to 26 storeys, the absolute building height would remain unchanged as that of the Conforming Scheme. The Proposed Development would be compatible with the adjacent low to medium-rise residential development.
<p><u>Infrastructural Concerns</u></p> <ul style="list-style-type: none"> The existing drainage, sewerage network and community facilities were planned in accordance with the needs of Park Signature and La Grove. The existing infrastructure may not be able to support the Proposed Development. 	The Site has always been zoned "Residential (Group A) 1" with the planning intention for high density residential development and the existing infrastructure should have already catered for the Proposed Development. Nevertheless, various technical assessments have been carried out to ensure the technical feasibility of the proposed development.
<p><u>Bicycle Facilities</u></p> <ul style="list-style-type: none"> The bicycle parking spaces are located on Government Land. These facilities should be shared use by the public. 	The bicycle parking spaces are provided within the subject lot for use by the future residents.
<p><u>Inconsistent Land Use Rationale</u></p> <ul style="list-style-type: none"> Turning a site that was previously allocated for rest and entertainment into housing appears to be an unreasonable reallocation of community resources. 	The Site has always been zoned "Residential (Group A) 1" with the planning intention for high density residential development. Hence, there has not been any change in the land use.

Compiled by: KTA
Date: 19 May 2026

**S16 PLANNING APPLICATION
DRAFT YUEN LONG OUTLINE ZONING PLAN NO. S/YL/28**

**Proposed Minor Relaxation of Building Height Restriction
for Permitted Flat in “Residential (Group A) 1” Zone,
Lot Nos. 2268S.A, 2268 RP, 2269 RP, 2270 RP, 2271, 2272, 2273 S.A RP,
2273 S.B ss.2, 2273 S.B ss.3, 2273 S.B ss.4, 2273 S.B RP, 2273 S.C ss.2,
2274, 2275 in DD120 and Adjoining Government Land, Kung Um Road,
Yuen Long, N.T.**

SUPPORTING PLANNING STATEMENT

May 2026

Applicant:

Reach High Development Limited

Consultancy Team:

KTA Planning Ltd.

Ronald Lu & Partners Ltd.



PLANNING LIMITED
規劃顧問有限公司



S3185/PS/V02

Executive Summary

This Supporting Planning Statement is prepared on behalf of Reach High Development Limited (the “Applicant”) to seek approval from the Town Planning Board (“TPB”) under Section 16 of the Town Planning Ordinance for a proposed for the minor relaxation of building height restriction from 25 storeys (excluding basement) to 26 storeys for the permitted Flat at various lots in DD120 and adjoining Government Land, Kung Um Road, Yuen Long (“the Site”). The Site falls within an area zoned “Residential (Group A) 1” (“R(A)1”) on the Draft Yuen Long Outline Zoning Plan No. S/YL/28 (the “Draft OZP”).

The Proposed Development involves the relocation of 1 level of basement carpark to above-ground, resulting in an increase in building height of one storey (above-ground) which exceeds the building height restriction of 25 storeys (excluding basement) allowed under the “R(A)1” zone of the Draft OZP. Hence, a minor relaxation of the building height restriction is required.

The Proposed Development with minor relaxation of building restriction is fully justified by the following main reasons:

- The Proposed Development is totally in-line with the Government’s policy on relaxation of GFA exemption arrangement for car parks in private developments.
- The results of the Visual Appraisal indicated that **there is no difference in terms of building height** as viewed from the chosen public viewpoints. No adverse visual impact would be anticipated.
- The Proposed Development has incorporated various design merits to improve the quality of the living environment.
- To avoid any potential local adverse air ventilation impact, the Proposed Development has allowed a separation of about 30m between the two towers and podium setback from Kum Um Road and Park Signature in order to achieve the concepts of ‘inter-building spacing’ or ‘courtyard’ to facilitate wind penetration. Hence, no adverse air ventilation impact will be resulted.
- The slight increase in building height will not incur any increase in plot ratio / GFA permitted under the zoning. No adverse traffic and infrastructural impact will be anticipated.

In light of justifications given throughout the Supporting Planning Statement, we sincerely request the TPB to give favourable consideration to this Planning Application.

行政摘要

(內文如有差異，應以英文版本為準)

本規劃申請書是代表申請人 Reach High Development Limited(下稱「申請人」)根據城市規劃條例第 16 條，向城市規劃委員會(下稱「城規會」)申請略為放寬位於元朗公庵路丈量約份第 120 約多個地段及毗連政府土地(下稱「申請地點」)的建築物高度限制，由 25 層(不包括地庫)放寬至 26 層。申請地點位於元朗分區計劃大綱草圖編號 S/YL/28(下稱「大綱草圖」)上被劃為「住宅(甲類)1」用途的地方。

擬議發展項目涉及將原先位於地庫的一層地下停車場在地面以上設置，以致建築物地面以上的高度需要增加一層，超出了「住宅(甲類)1」地帶在規劃大綱草圖所容許的 25 層(不包括地下層)的建築物高度限制。因此，建築物的高度限制需要對作出輕微放寬。

擬議略為放寬建築物高度限制的發展計劃主要理據如下：

- 擬議發展完全符合政府對私人發展項目中停車場豁免總樓面面積的優化安排的政策。
- 視覺評估結果顯示，擬議建築物高度不會產生不良的視覺影響。
- 擬議發展項目已加入多項設計優點，以提升居住環境的質素。
- 擬議發展在兩座大樓之間預留約 30 米的間距以及平台從公庵路和漆柏後移，符合「建築物空間」或「庭院」的概念，以在向風的位置提供足夠的建築物空間，不會產生不良的空氣流通的影響。
- 建築物高度的輕微增加不會導致地積比率／總樓面面積的增加。因此，不會對交通及基礎設施造成不利影響。

基於以上各項規劃理據，申請人希望是次的規劃申請能獲城規會支持。

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S16 PLANNING APPLICATION
Draft Yuen Long Outline Zoning Plan No. S/YL/28

**Proposed Minor Relaxation of Building Height Restriction
for Permitted Flat in “Residential (Group A) 1” Zone,
Lot Nos. 2268S.A, 2268 RP, 2269 RP, 2270 RP, 2271, 2272, 2273 S.A RP,
2273 S.B ss.2, 2273 S.B ss.3, 2273 S.B ss.4, 2273 S.B RP, 2273 S.C ss.2, 2274,
2275 in DD120 and Adjoining Government Land
Kung Um Road, Yuen Long, N.T.**

Supporting Planning Statement

1. INTRODUCTION

1.1 Purpose

1.1.1 This Planning Application is prepared and submitted on behalf of Reach High Development Limited (“the Applicant”) to seek approval from the Town Planning Board (“TPB”) under Section 16 of the Town Planning Ordinance for the minor relaxation of building height restriction from 25 storeys (excluding basement) to 26 storeys for the permitted Flat at Lot Nos. 2268S.A, 2268 RP, 2269 RP, 2270 RP, 2271, 2272, 2273 S.A RP, 2273 S.B ss.2, 2273 S.B ss.3, 2273 S.B ss.4, 2273 S.B RP, 2273 S.C ss.2, 2274, 2275 in DD120 and Adjoining Government Land, Kung Um Road, Yuen Long, N.T. (“the Site”). The Site falls within an area zoned “Residential (Group A) 1” (“R(A)1”) on the Draft Yuen Long Outline Zoning Plan No. S/YL/28 (the “Draft OZP”). This Planning Statement is to provide the TPB with relevant information for consideration of this Planning Application.

1.2 Report Structure

1.2.1 Following this introductory section, the site and planning context will be briefly summarised in Section 2. The Indicative Development Scheme is included in Section 3. The planning merits and justifications for the Planning Application will be explained in Section 4. The Planning Statement will be concluded in Section 5.

2. PLANNING AND SITE CONTEXT

2.1 Site Location and Existing Condition

2.1.1 The Site is located at various lots in DD120 and adjoining Government Land, Kung Um Road, Yuen Long. It is bounded by Kung Um Road on the east and existing residential development, La Grove, Park Signature (Towers 1 to 3) and Park Signature (Towers 5 to 10) to its north, west and south respectively. The proposed vehicular access is via Kung Um Road (**Figure 2.1** refers).

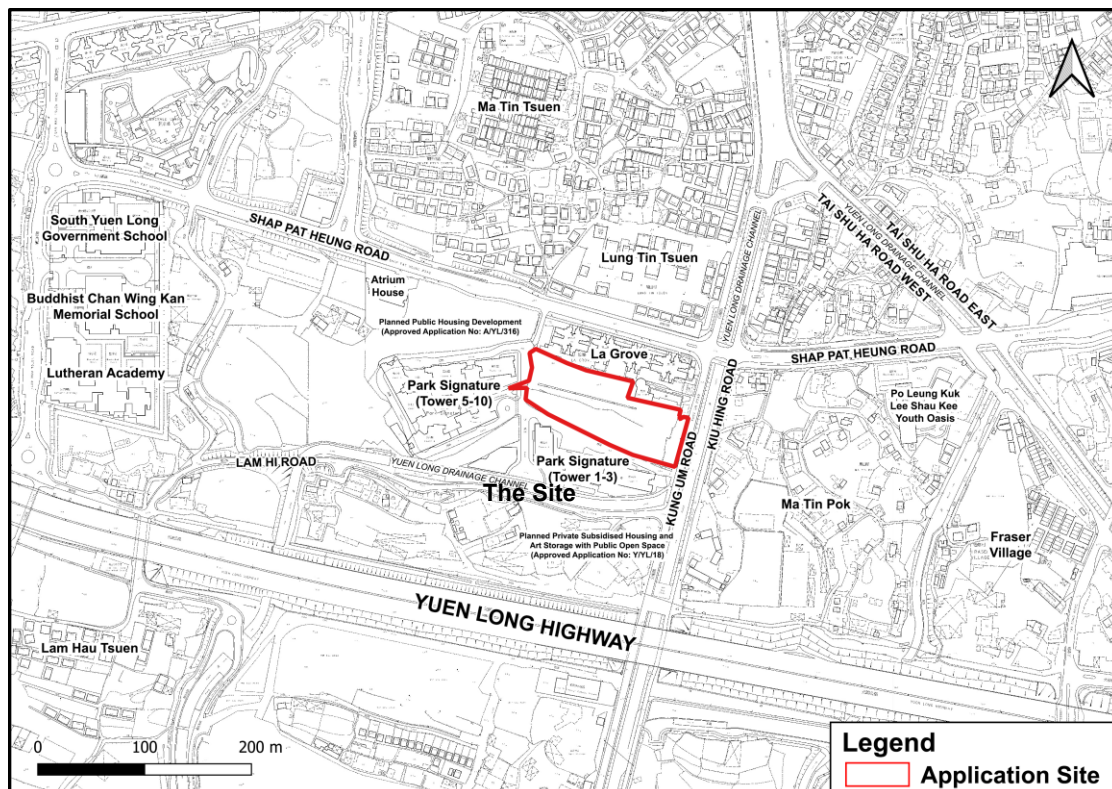


Figure 2.1 Site Location Plan

2.2 Land Status

2.2.1 The Site comprises Lot Nos. 2268S.A, 2268 RP, 2269 RP, 2270 RP, 2271, 2272, 2273 S.A RP, 2273 S.B ss.2, 2273 S.B ss.3, 2273 S.B ss.4, 2273 S.B RP, 2273 S.C ss.2, 2274, 2275 in DD120 and Adjoining Government Land, Kung Um Road, Yuen Long, N.T. (**Figure 2.2** refers). The total site area is approximately 8,235 m², including private land lot of about 6,461 m² and Government land of about 1,774 m². The Applicant is the sole owners of the lots within the Site.

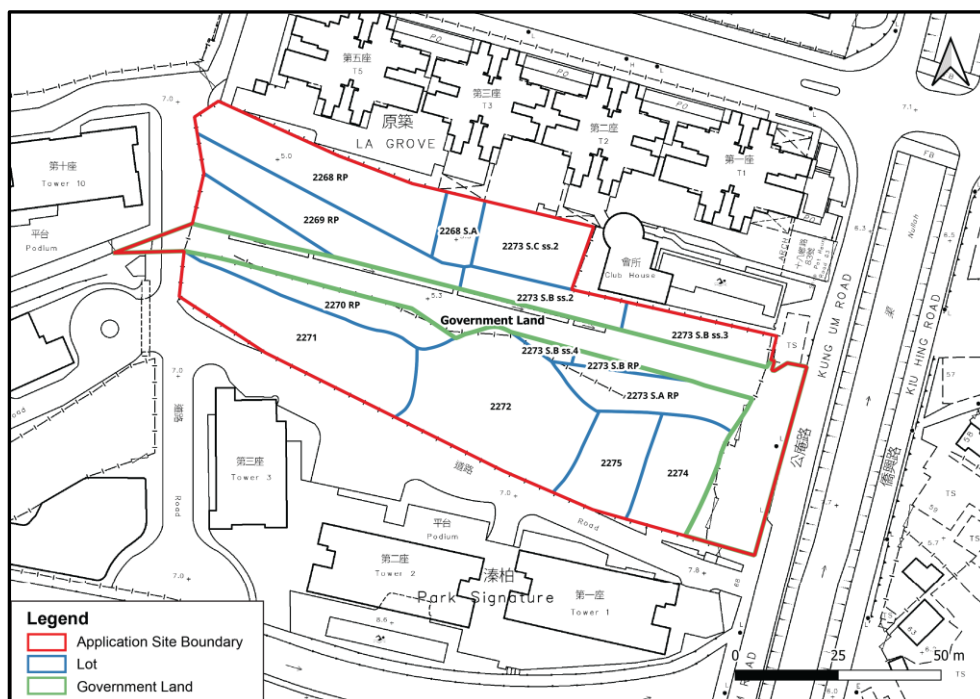


Figure 2.2 Land Status Plan

2.3 Surrounding Context

2.3.1 The Site is surrounded by mainly residential, village and some Government, Institution or Community uses (**Figure 2.1** and **2.3** refer).

- To its immediate north within the same “R(A)1” zone is an existing residential development, La Grove.
- To its immediate south and west within the same “R(A)1” zone is an existing residential development, Park Signature (with 9 towers).
- To its northwest is a planned public housing development providing about 944 nos. of flats.
- To the further northwest is an existing house development, Atrium House.
- To its east across from Kung Um Road and drainage channel is a “Village Type Development” (“V”) zone occupying by village houses.
- To its further north is another “V” zone where Lung Tin Tsuen and Ma Tin Tsuen are located.
- To its further south is a planned private subsidised housing and art storage with public open space located within an area zoned “Other

Specified Uses" annotated "Private Subsidised Housing and Art Storage with Public Open Space" and "Residential (Group A) 7".

- To its further south and west is a strip of "Open Space" zone intended for provision of recreational and sports facilities and serving as a buffer area between Yuen Long Highway and the areas located to the north.
- To its further west is an area zoned "Government, Institution or Community" zone where a number of schools including South Yuen Long Government School, Buddhist Chan Wing Kan Memorial School and Lutheran Academy are located.

2.4 Statutory Planning Context

2.4.1 The Site falls within an area zoned "R(A)1" on the Draft OZP and is subjected to a building height restriction of 25 storeys (excluding basement) (**Figure 2.2** refers). According to the Statutory Notes of the Draft OZP, the planning intention of "R(A)" zone is intended "*primarily for high-density residential development*". It is also stated that "*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*". 'Flat' is a column 1 use which is always permitted by the TPB.

2.4.2 According to the "Remarks" of the "R(A)" zone, it is stated that "*based on the individual merits of a development or redevelopment proposal, minor relaxation of the plot ratio, gross floor area, building height and/or site coverage restrictions as stated in paragraphs (a), (b), (c), (d), (e), (f), (g), (i) and (j) may be considered by the TPB on application under section 16 of the Town Planning Ordinance*".

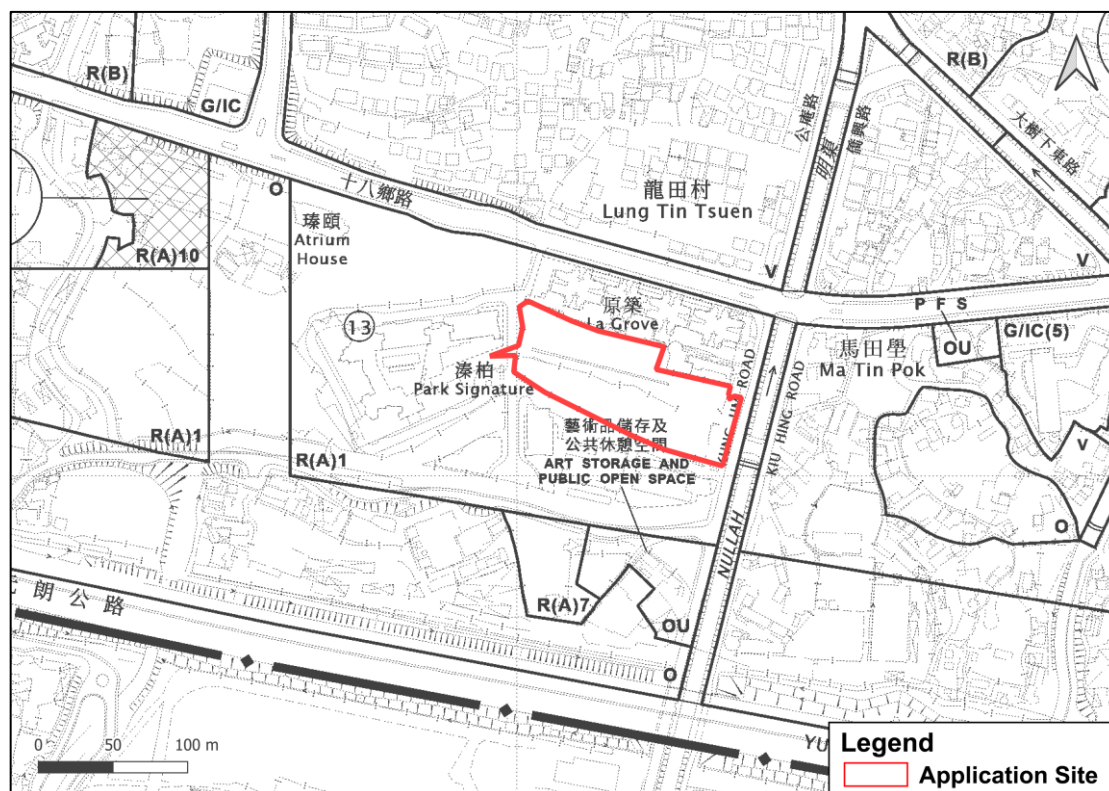


Figure 2.2 Zoning Context Plan (Extracted from Approved OZP)

2.5 Government's Policy on Relaxation of GFA Exemption Arrangement for Car Parks in Private Development

2.5.1 As announced in the Policy Address 2025, the Government is endeavoured to lower the construction costs by streamlining approval processes. Relaxation of GFA exemption arrangement for car parks in private developments was proposed by removing the mandatory requirement of constructing underground car parks as a condition of exemption. Full GFA exemption would be granted if developers are to construct no more than two storeys of above ground car parks. Building Department's updated Practice Note for Authorized Persons, Registered Structural Engineers and Registered Geotechnical Engineers APP-2 was promulgated in November 2025 with details on the enhanced measures. If the aboveground carparks would result in exceedance of building height restriction on the statutory plan, a S16 Planning Application for minor relaxation of building height restriction will be required. Under normal circumstances, only a visual appraisal is required if the relaxation is solely for accommodating the two storeys of aboveground car parks. If the site is situated on major breezeways, a simple review of the air ventilation impacts would be required.

3. PROPOSED DEVELOPMENT SCHEME

3.1 The Development Scheme

3.1.1 Schematic drawings and section for the Proposed Development is presented at **Appendix 1** of this Supporting Planning Statement. Comparison section is also included at **Appendix 2** to demonstrate the car park arrangement under the OZP Compliant (Conforming Scheme) and Proposed Scheme. Relaxation of building height restriction is required for the relocation of 1 level of basement carpark to above-ground. Comparison of major development parameters between the Conforming and Proposed Schemes are summarized in **Table 3.1**. The target completion year of the Proposed development is 2030.

Table 3.1 Comparison of Major Development Parameters for the Conforming and Proposed Scheme

Overall Development	Conforming Scheme (a)	Proposed Scheme (b)	Difference (b-a)
Site Area (about)	8,235 m ²	8,235 m ²	No Change
Domestic Plot Ratio (about)	5.0	5.0	No Change
Total Domestic GFA (about)	41,175 m ²	41,175 m ²	No Change
Site Coverage (not more than)	25%	25%	No Change
Building Height (Main Roof) (about)	92.45mPD	92.45mPD	No Change
No. of Storeys (about)	25 nos. (excluding 1 level of B/F Carpark but including 1 level of G/F carpark/clubhouse and 1 level of landscape deck/clubhouse)	26 nos. (including 2 levels of Carpark and 1 level of landscape deck/clubhouse)	+ 1 no.
Number of Car Parking Spaces (Nos.)			
- Private Cars	188 nos.	188 nos.	No Change
- Motorcycle	13 nos.	13 nos.	No Change
- L/UL Bay	2 nos.	2 nos.	No Change
Number of Units (about)	1,035 nos.	1,035 nos.	No Change
Average Unit Size (about)	39.8 m ²	39.8 m ²	No Change

3.2 Design Considerations

3.2.1 In formulating the Development Scheme, the schematic design has taken into account the various site constraints as well as design considerations in order to ensure that the Scheme is designed to create a high-quality development in harmony with surrounding environment. The Proposed Development adopts a number of sensitive design measures to respond

positively to the surrounding medium-density residential neighbourhood as follows:

Careful Disposition of Tower Blocks

3.2.2 The Site is elongated in shape and is surrounded by various medium-rise residential developments including La Grove and Park Signature. The disposition of the residential towers will have to be carefully designed to achieve a quality living environment for the future residents while respecting the adjacent developments. The form and disposition of tower blocks have been purposely designed to maximize building setback from the adjacent developments. Overlooking of residential units has also been minimized to protect the privacy of the residents.

3.2.3 To reduce the sense of encroachment of pedestrians, the podium has been setback about 10m from the centreline of Kung Um Road which is more than the required 7.5m for fulfilling the setback requirement of Sustainable Building Design Guidelines ("SBDG"). Opportunity has been taken to provide about 142 nos. of bicycle parking spaces at the setback area to offer convenient parking facilities for future residents to facilitate cycling activities.

Adoption of Permeable Design

3.2.4 The Proposed Development comprises two residential towers atop a 3-storey podium. The building footprint of both podium and tower has been optimized taking into the site conditions. The podium has been designed to avoid the area with low rockhead within the Site to minimize the possible complications in the foundation works. Hence, consideration setback of podium structure from Park Signature will also be allowed. A 3-storey podium is required to accommodate the required internal transportation and the ancillary residential supporting facilities as a result. The footprint and form of the towers have also been optimized to provide a separation of about 30m between the towers to facilitate local air ventilation performance and enhance visual permeability of the Site.

Optimized Floor-to-Floor Height

3.2.5 The Proposed Development incorporates optimized floor-to-floor height to enhance spatial quality and functionality. For the carpark floors, a floor-to-floor height of about 3.75m has been adopted while a floor-to-floor height of about 3.15m has been adopted for the residential floors. The proposed floor-to-floor height is not excessive and would meet the functional needs. Although the Proposed Development involves an increase in one storey aboveground, there is no increase in the absolute building height as compared to the Conforming Scheme.

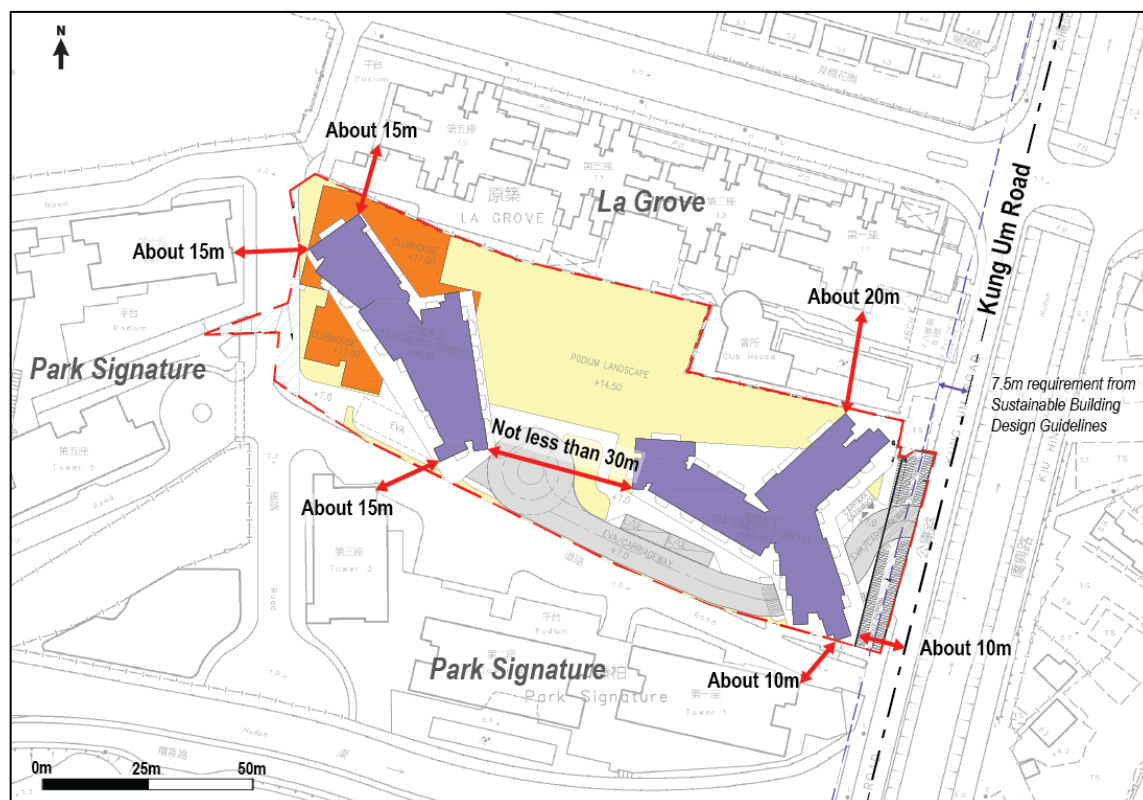


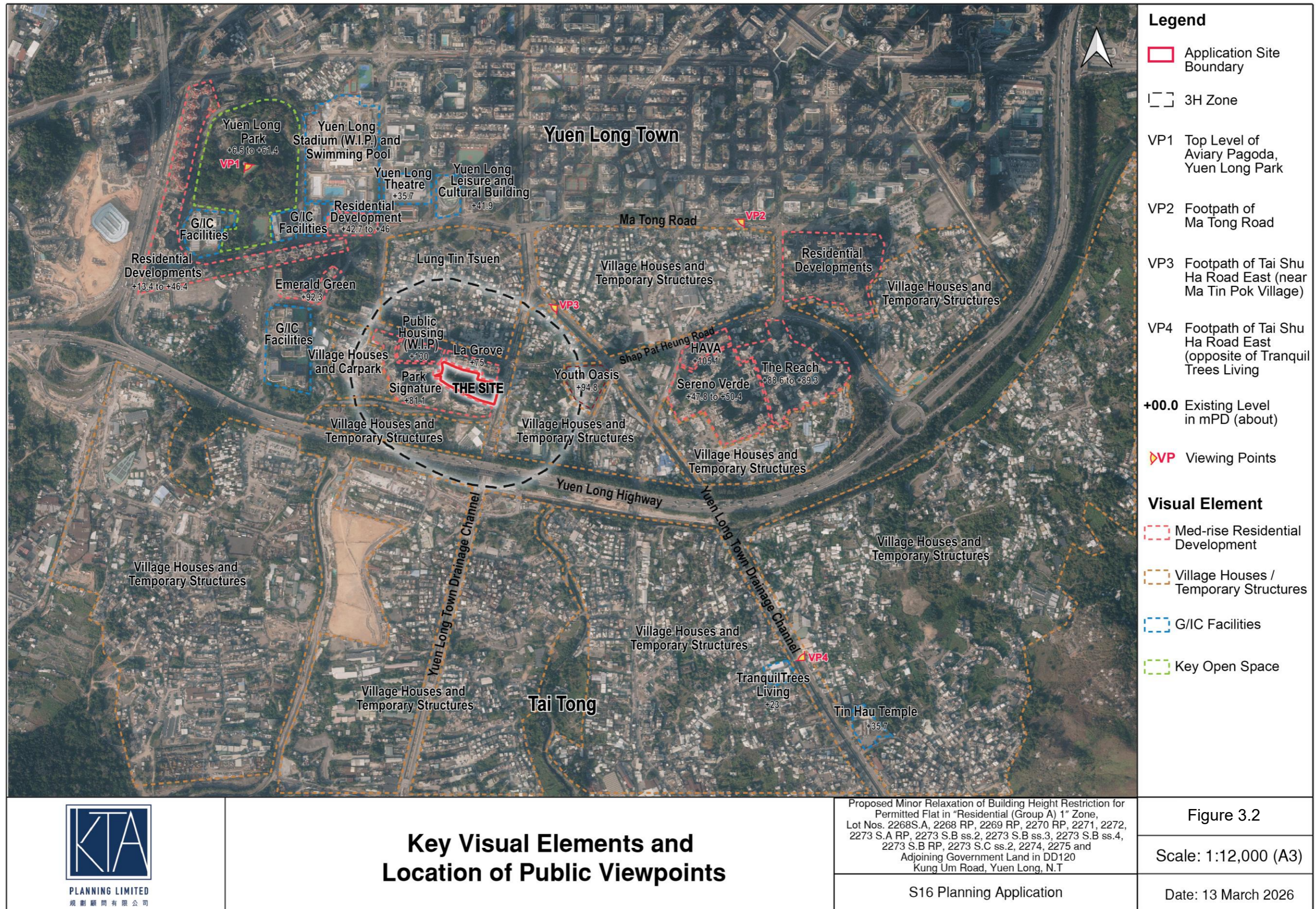
Figure 3.1 Proposed Design Measures

3.3 Visual Appraisal

3.3.1 A Visual Appraisal ("VA") has been conducted to evaluate the potential visual impact associated with the Proposed Development. Local viewing points and viewing points at adjacent neighbourhood have been selected for assessing the visual impact to the public viewers.

Selection of Representative Viewing Points

3.3.2 In this VA, four VPs are selected for assessment on the visual impact of the Proposed Development for demonstrating the potential cumulative impact, which are briefly introduced as follows and summarised in **Table 3.2**. Location of the VPs are illustrated in **Figure 3.2**.



VP1 – Top Level of Aviary Pagoda

Aviary Pagoda is a 7-storey tower located on the hill of Shu Ngau Ling in Yuen Long Park. An aviary is situated at the ground floor of the tower while public viewing platforms are located at the upper levels which offers a panoramic view towards Yuen Long and Tin Shui Wai. The tower is a popular recreational spot for the local residents and visitors.

VP2 – Footpath of Ma Tong Road

This VP is taken from the footpath of Ma Tong Road. Ma Tong Road is a main artery in the southern part of Yuen Long town centre connecting to Ma Tin Road. The road offers an alternative route for commuters apart from the central Castle Peak Road - Yuen Long section. The pedestrians will usually gain access to the various Government, Institution or Community facilities including a number of schools, Yuen Long Jockey Club Squash Court and Yuen Long Yung Fung Shee Clinic Community Nursing Service Centre.

VP3 – Footpath of Tai Shu Ha Road East near Ma Tin Pok Village

This VP is taken from the footpath of Tai Shu Ha Road West near Ma Tin Pok Village. Tai Shu Ha Road East is a main road in the Shap Pat Heung area, situated to the south of Yuen Long Highway. It runs parallel to Tai Shu Ha Road West and the upstream of Yuen Long Nullah. This section of Tai Shu Ha Road East serves mainly the residents of the various villages including Ma Tin Pok Village along the road.

VP4 – Footpath of Tai Shu Ha Road East opposite of "TranquilTrees Living"

This VP is taken from the footpath of Tai Shu Road East, which is opposite to the transitional housing project "TranquilTreesLiving" along Tai Shu Ha Road West. The road serves as the main transport corridor and pedestrian route connecting Tin Hau Temple, Nam Hang Tsuen, and brownfield sites to Yuen Long city centre and is frequently used by pedestrians and drivers.

Table 3.2 Identified Public Viewpoints with Preliminary Analysis

Viewpoints (VPs)	Distance/ Direction (Approx.)	Height in mPD (Approx.)	Viewers	Nature of VP	Popularity by Public	Sensitivity of Viewers
VP1: Top of Aviary Pagoda	725m/ Northwest	+60	Recreational Users of Yuen Long Park	Passive Recreational	Frequent	High
VP2: Footpath of Ma Tong Road	755m/ Northeast	+5.3	Commuters, local residents and pedestrians	Kinetic	Occasional	Low to Medium
VP3: Footpath of Tai Shu Ha Road East near Ma Tin Pok Village	250m/ Northeast	+5.7mPD	Local residents	Kinetic	Occasional	Low to Medium

VP4: Footpath of Tai Shu Ha Road East (opposite of TranquilTrees Living)	1.2km/ Southeast	+10.6	Commuters, local residents and visitors of Tin Hau Temple	Kinetic	Occasional	Low to Medium
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Discussions on Visual Impacts

- 3.3.3 **VP1 (Figure 3.2 refers):** VP 1 is located about 725m to the northwest of the Site. It captures the view of existing developments in Yuen Long Town Centre, Shap Pat Heung and Tai Tong with vegetations in the foreground and the mountain backdrop and open skyview in the background. The main visual elements, including vegetation as well as mountain backdrop and open view of the sky will not be affected. The proposed Shap Pat Heung Road Public Housing Development (Approved Application No.: A/YL/316) with a building height of about 130mPD will be situated to the northwest of the Site and only the upper portion of the proposed residential towers at the Site will be visible at this VP. The public viewers of this VP will often seek for high quality view from the viewing platforms and their visual sensitivity is high. However, as shown in **Figure 3.2**, it is demonstrated that with or without the minor relaxation of building height restriction, the visual change is considered negligible.
- 3.3.4 **VP 2 (Figure 3.3 refers):** VP 2 is located about 755m to the northeast of the Site. This VP captures the existing Ma Tong Road, the roadside planters and vegetation as well as noise barrier in the foreground and the open skyview in the background. The main visual elements include roadside greenery and open view of the sky. Due to the kinetic nature of pedestrians and drivers, their visual sensitivity is considered low to medium. With or without the minor relaxation of building height, the visual change due to the Proposed Development is expected to be negligible.
- 3.3.5 **VP3 (Figure 3.4 refers):** VP3 is located about 250m to the southeast of the Site. This VP captures the Yuen Long Nullah, Ma Tin Pok Village, Public Toilet, and vegetations in the foreground. The open skyview and existing medium rise residential developments including La Grove and Park Signature formed the background. The main visual elements i.e. existing vegetation and open skyview will be maintained upon the completion of the Proposed Development. Given its visual compatibility to surrounding context and will not create any obstruction to the visual resources, the magnitude of visual change experienced by public viewers due to minor relaxation of building height is considered negligible.
- 3.3.6 **VP4 (Figure 3.5 refers):** VP4 is located about 1.2km to the southeast of the Site. This VP captures the Yuen Long Nullah, transition housing "TranquilTrees Living", open storage site and some roadside greenery in the foreground. The background includes the top portion of Park Signature, Po Leung Kuk Lee Shau

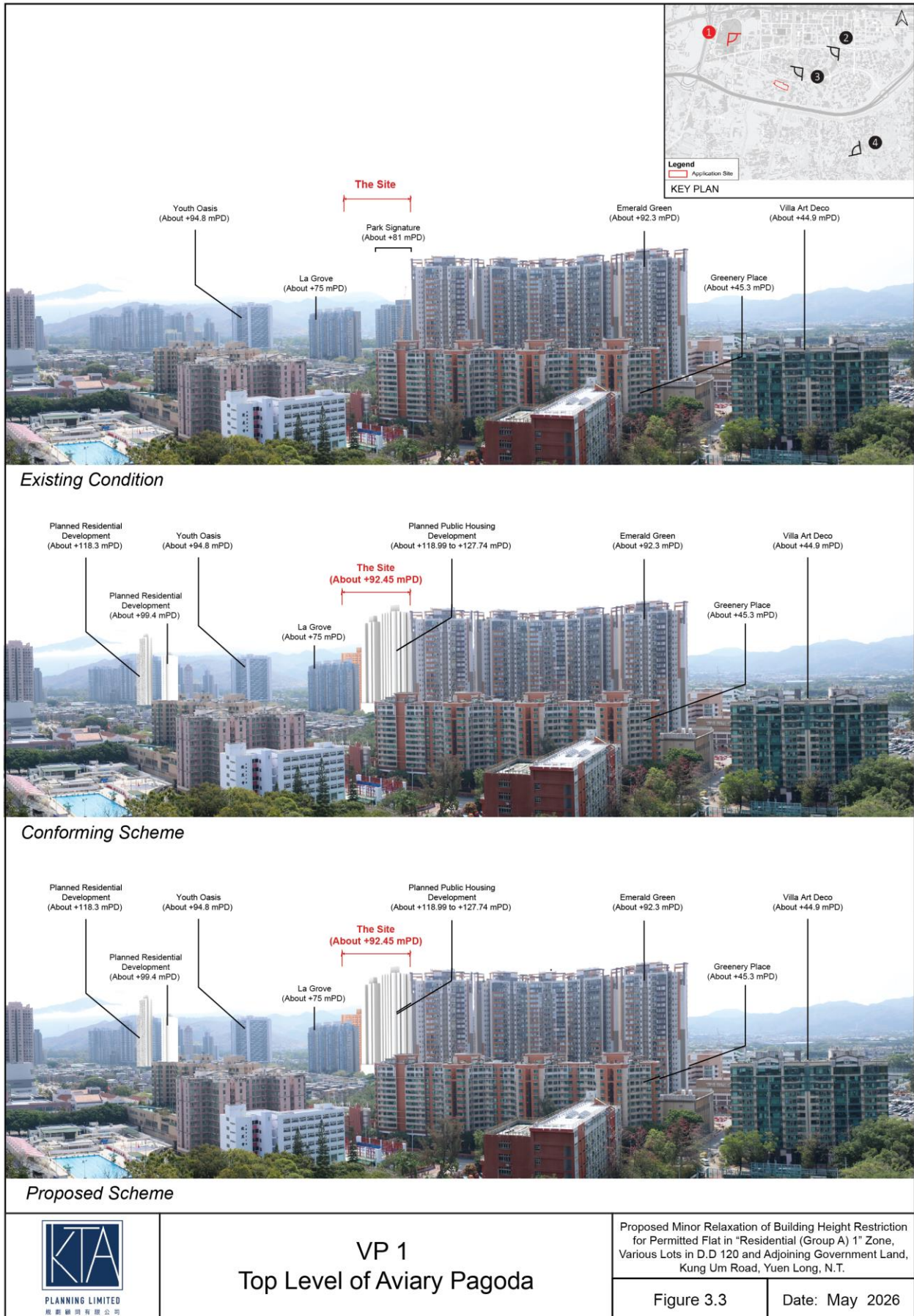
Kee Youth Oasis and the open skyview. The change in visual composition of the Proposed Scheme due to the minor increase of building height with such distance will not be observable. The main visual elements including roadside greenery and open skyview will not be affected. Due to the kinetic nature of pedestrians and drivers, their sensitivity will be low to medium. Hence, with or without the minor relaxation of building height, the change due to the Proposed Development is expected to be negligible.

Conclusion

3.3.7 The proposed development has compatible building height with the existing and planned surrounding context. It is concluded that the overall visual impact induced by the Proposed Development due to the minor relaxation of building height restriction is Negligible.

Table 3.3 Summary of Assessment of Visual Impact

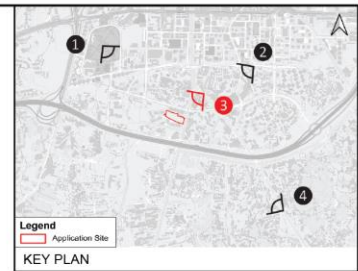
Viewpoint	Location	Visual Impact
VP1	Top of Aviary Pagoda	Negligible
VP2	Footpath of Ma Tong Road	Negligible
VP3	Footpath of Tai Shu Ha Road East (near Ma Tin Pok Village)	Negligible
VP4	Footpath of Tai Shu Ha Road East (opposite of TranquilTrees Living)	Negligible
Overall		Negligible







Existing Condition



Conforming Scheme



Proposed Scheme



VP 3
Footpath of Tai Shu Ha Road East
(near Ma Tin Pok Village)

Proposed Minor Relaxation of Building Height Restriction for Permitted Flat in "Residential (Group A) 1" Zone, Various Lots in D.D 120 and Adjoining Government Land, Kung Um Road, Yuen Long, N.T.

Figure 3.5

Date: May 2026




Existing Condition



Conforming Scheme



Proposed Scheme

	<p>VP 4 Footpath of Tai Shu Ha Road East (opposite of TranquilTrees Living)</p>	Proposed Minor Relaxation of Building Height Restriction for Permitted Flat in "Residential (Group A) 1" Zone, Various Lots in D.D 120 and Adjoining Government Land, Kung Um Road, Yuen Long, N.T.	
		Figure 3.6	Date: May 2026

- 3.4.1 According to the consultancy study of Expert Evaluation on Air Ventilation Assessment of Yuen Long Town (YL AVA(EE) Study) conducted in 2008, the landscape corridor (zoned "O" and to the west of the Site) in Area 13 (to the west of the Site) is a key breezeway in the area and it should be kept free of developments. According to the Explanatory Statement of the Draft OZP, the concepts of 'inter-building spacing' or 'courtyard' by providing adequate space between buildings at wind direction should be applied as far as practicable in the design of future developments in the "R(A)1" zone to avoid potential local adverse air ventilation problem. To improve the local air ventilation performance, the Proposed Development Scheme has incorporated a building separation of about 30m between the two towers. Podium setback has also been provided from Park Signature and Kung Um Road. A landscape garden has been provided at the podium deck to create a 'courtyard' design for enjoyment of the future residents.

4. PLANNING MERITS AND JUSTIFICATIONS

4.1 In-line with Government's Policy on Relaxation of GFA Exemption Arrangement for Car Parks in Private Development

4.1.1 Apart from improving the efficiency of land production to meet the demand for major development projects, long-term economic development and community's housing needs, the Government is also endeavoured to expedite developments by removing the mandatory requirement of constructing underground car parks as a condition of exemption so that construction cost can be lowered and construction time can be reduced. Full GFA exemption would be granted if developers are to construct no more than two storeys of above ground car parks. The only reason why this Planning Application is required is due to the relocation of the one level of basement carpark (which does not need to count towards building height under the "R(A)1" zone) to above-ground and the one extra storey upon relocation would become accountable for building height and exceed the building height restriction of 25 storeys (excluding basement). Without the need of basement construction, the construction time would be shortened by about 6 months. Hence, the Proposed Development is totally in-line with the Government's policy on relaxation of GFA exemption arrangement for car parks in private developments.

4.2 No Change in Overall Building Height and No Adverse Visual Impact is Anticipated

4.2.1 The Site is subjected to a building height restriction of 25 storeys (excluding basement). The relocation of one storey of underground car park to above-ground would result in a building height of 26 storeys thus a minor relaxation of building height restriction is required. According to the Proposed Scheme, floor-to-floor height of the carpark floors has been minimized to about 3.75m only with a standard floor-to-floor height (i.e. 3.15m) for residential units. Hence, the resultant building height (at main roof) is about 92.45mPD which is the same as the building height of the Conforming Scheme. The proposed building height of 26 storeys (i.e. about 92.45mPD) would be compatible with the building height of adjacent developments including La Grove (about 75mPD); Park Signature (about 81.1mPD); planned public housing development within the same "R(A)1" zone (about 130mPD); and planned subsidised housing development in the "OU" and "R(A)7" zones (about 88mPD).

4.2.2 The results of the Visual Appraisal indicated that there is no difference in terms of building height as viewed from the selected public viewpoints as demonstrated in the Visual Appraisal. No adverse visual impact due to the increase in building height would be anticipated.

4.3 Incorporation of Various Design Merits

4.3.1 The building form and disposition of the Proposed Development have been carefully thought-out to respond to the surrounding context. Various sensitive design measures have been incorporated to enhance the living quality of the future residents as well as nearby residents. The form and disposition of tower blocks have been purposely designed to maximize building setback from the adjacent developments to minimize overlooking of residential units for protection of privacy of the residents. Despite the limited buildable area and the need to fulfil tower prescribed window requirement, a separation of about 30m has been incorporated between the two towers. The permeable design would significantly improve the visual permeability and local air ventilation of the area.

4.3.2 Taking into account the site constraint (i.e. low rockhead area) and to enhance the spatial quality of the residential cluster, considerable setback of podium structure from Park Signature has also been incorporated. Furthermore, the podium has also been setback about 10m from the centreline of Kung Um Road to reduce the sense of encroachment for the pedestrians. Bicycle parking spaces will be provided at the setback area to offer convenient parking facilities for future residents. Carefully thought-out building design including architectural articulations and façade treatment will be adopted to enhance the quality of the Proposed Development.

4.4 Technically Feasible with No Insurmountable Impacts

Air Ventilation Aspect

4.4.1 Area 13 (where the Site is located) would enjoy ample breezes. The landscape corridor (zoned "O" and to the west of the Site) in Area 13 which is a key breezeway in the area. To avoid any potential local adverse air ventilation impact, the Proposed Development has allowed a separation of about 30m between the two towers as well as podium setback from Park Signature and Kung Um Road in order to achieve the concepts of 'inter-building spacing' or 'courtyard' to facilitate wind penetration. Hence, no adverse air ventilation impact will be resulted.

Traffic Aspect

4.4.2 The proposed Flat development is always permitted under the "R(A)" zone. The slight increase in building height will not incur any increase in plot ratio / GFA permitted under the zoning. The internal transportation facilities will be provided in accordance with the requirements of the Hong Kong Planning Standards and Guidelines. No adverse traffic impact will be resulted.

Infrastructural Aspect

4.4.3 As there is no increase in plot ratio / GFA as permitted under the "R(A)" zone, the proposed minor relaxation of building height restriction will not pose any adverse infrastructural impact to the surroundings.

5. CONCLUSION AND SUMMARY

5.1.1 In light of the above, it is believed that the Proposed Development with minor relaxation of building height restriction should be favourably considered by the TPB from a planning and technical point of view.

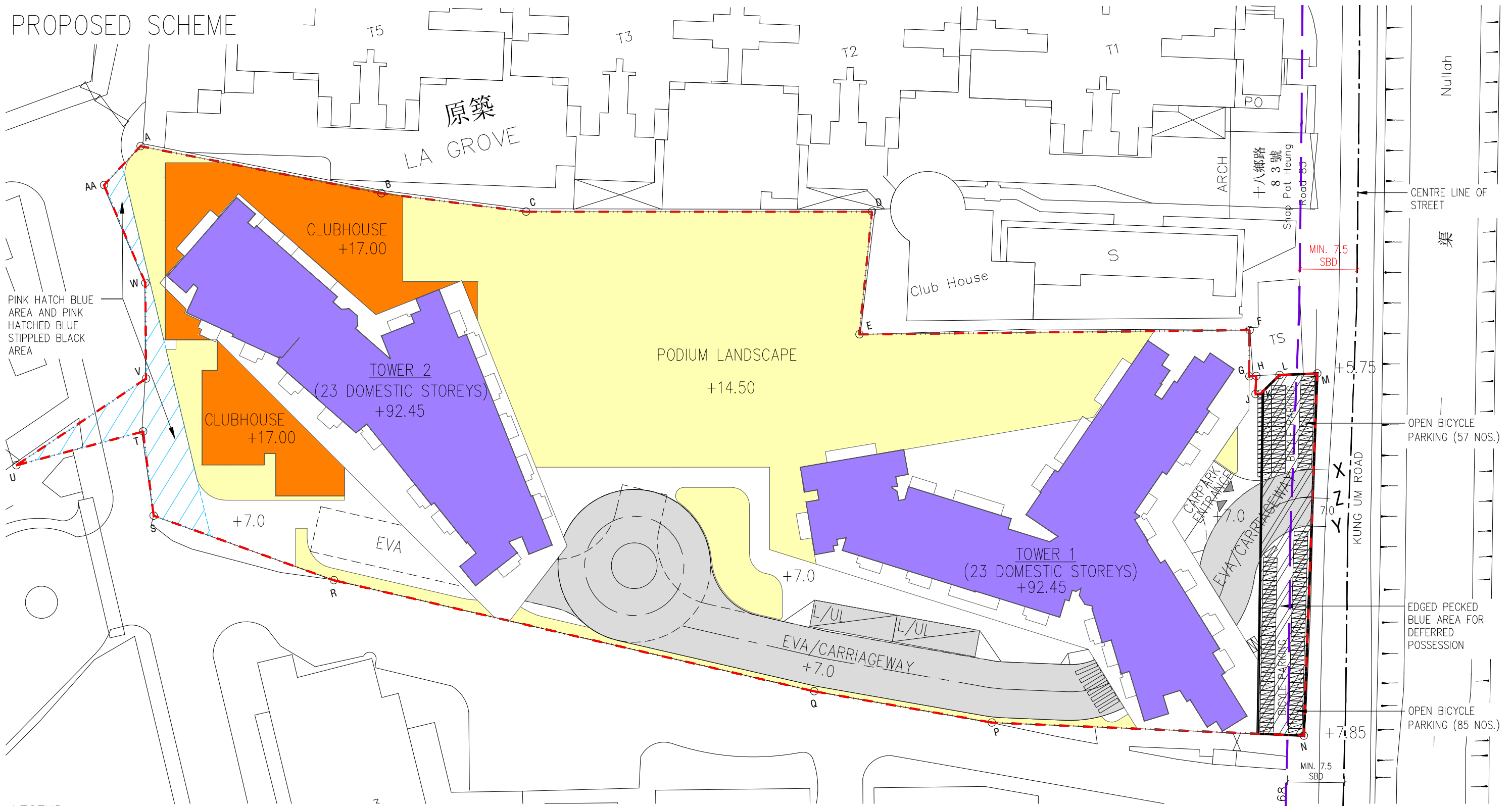
5.1.2 The Planning Department and Members of the TPB are respectfully requested to give favourable consideration to support the on the following main reasons:

- a) The Proposed Development, with the relocation of one-storey of underground car park to above-ground, resulting in minor exceedance of building height restriction (from 25 nos. of storeys (excluding basement) to 26 nos. of storeys) is totally in-line with the Government's policy on relaxation of GFA exemption arrangement for car parks in private developments.
- b) The results of the Visual Appraisal indicated that **there is no difference in terms of building height** as viewed from the chosen public viewpoints. No adverse visual impact would be anticipated.
- c) The Proposed Development has incorporated various design merits to improve the quality of the living environment.
- c) To avoid any potential local adverse air ventilation impact, the Proposed Development has allowed a separation of about 30m between the two towers and podium setback from Kum Um Road and Park Signature in order to achieve the concepts of 'inter-building spacing' or 'courtyard' to facilitate wind penetration. Hence, no adverse air ventilation impact will be resulted.
- d) The slight increase in building height will not incur any increase in plot ratio / GFA permitted under the zoning. No adverse traffic and infrastructural impact will be anticipated.

Appendix 1

Architectural Drawings

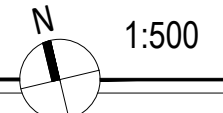
PROPOSED SCHEME



LEGEND

- BOUNDARY
- RESIDENTIAL
- CLUBHOUSE
- LANDSCAPE
- DRIVEWAY, CARPARK
- E/M
- PINK HATCH BLUE AREA
- EDGED PECKED BLUE AREA FOR DEFERRED POSSESSION

MASTER LAYOUT PLAN



PROPOSED RESIDENTIAL DEVELOPMENT
AT KUNG UM ROAD ON LOT NO. 4066 IN D.D. 120

Drawing Number :
S16_MLP

Revision Number :
-

Project No.

25092NT

Issue Date

MAR/26

File Path :
U:\Studio_V\Proj_Data\2025\25092NT Lung Tin Tsuen Phase 2\DRAWING\SUB\Section 16 application\MODEL\S16_MLP.dwg



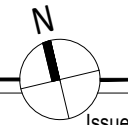
呂元祥建築師事務所

PROPOSED SCHEME



- LEGEND**
- - - BOUNDARY
 - RESIDENTIAL
 - CLUBHOUSE
 - LANDSCAPE
 - DRIVEWAY, CARPARK
 - E/M
 - PINK HATCH BLUE AREA
 - EDGED PECKED BLUE AREA FOR DEFERRED POSSESSION

GROUND FLOOR PLAN 1:500



PROPOSED RESIDENTIAL DEVELOPMENT
AT KUNG UM ROAD ON LOT NO. 4066 IN D.D. 120

Drawing Number : S16_GF Revision Number : - Project No. 25092NT
 File Path : U:\Studio_V\Proj_Data\2025\25092NT Lung Tin Tsuen Phase 2\DRAWING\SUB\Section 16 application\MODEL\S16_GF.dwg
 Issue Date MAR/26

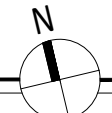
PROPOSED SCHEME



LEGEND

- BOUNDARY
- RESIDENTIAL
- CLUBHOUSE
- LANDSCAPE
- DRIVEWAY, CARPARK
- E/M
- PINK HATCH BLUE AREA
- EDGED PECKED BLUE AREA FOR DEFERRED POSSESSION

MEZZANINE FLOOR PLAN



1:500

PROPOSED RESIDENTIAL DEVELOPMENT
AT KUNG UM ROAD ON LOT NO. 4066 IN D.D. 120

Drawing Number :
S16_MF

Revision Number :
-

Project No.
25092NT

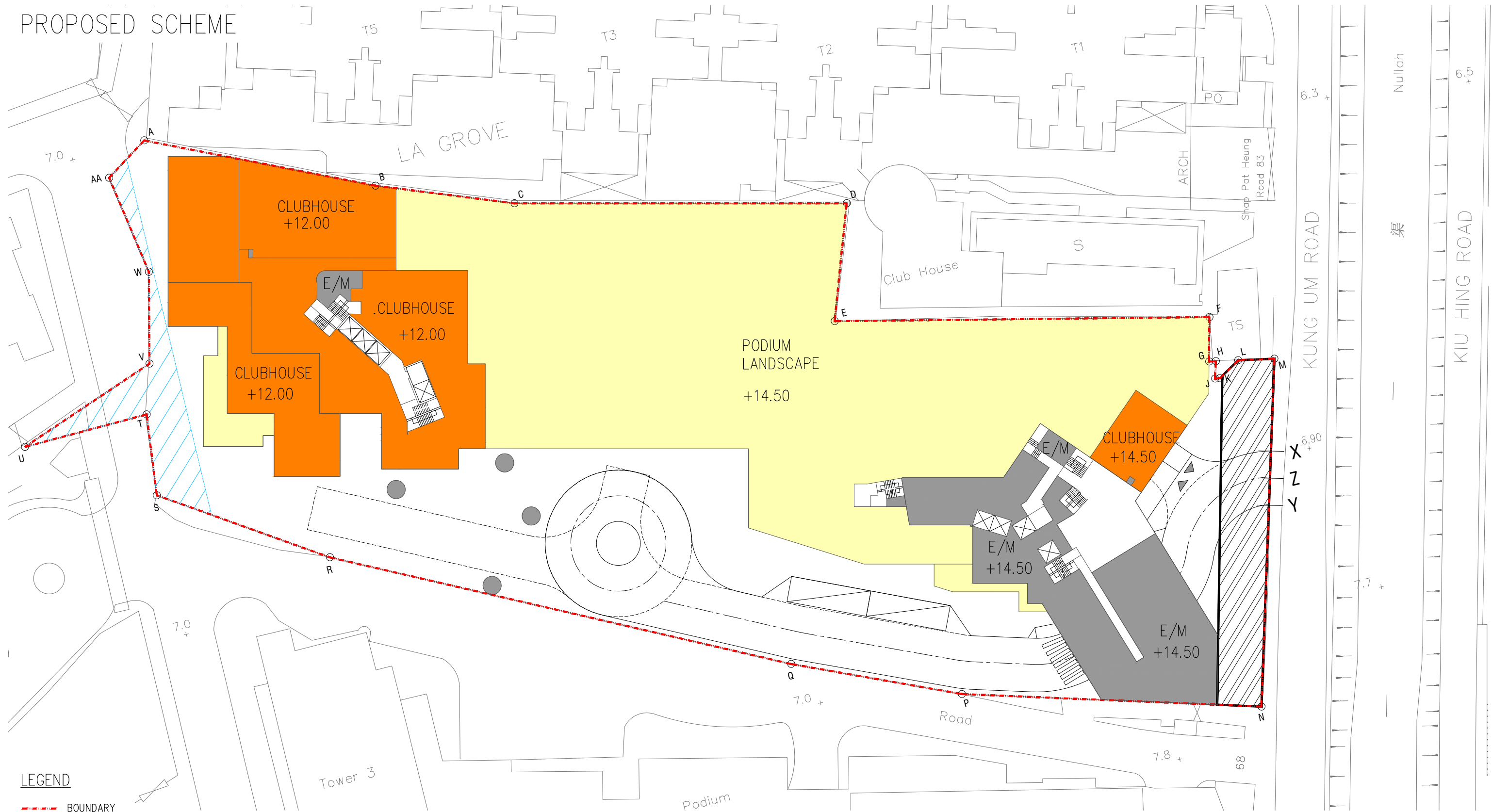
Issue Date
MAR/26

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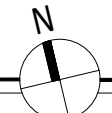
呂元祥建築師事務所

PROPOSED SCHEME



- LEGEND**
- BOUNDARY
 - RESIDENTIAL
 - CLUBHOUSE
 - LANDSCAPE
 - DRIVEWAY, CARPARK
 - E/M
 - PINK HATCH BLUE AREA
 - EDGED PECKED BLUE AREA FOR DEFERRED POSSESSION

FIRST FLOOR PLAN 1:500



PROPOSED RESIDENTIAL DEVELOPMENT
AT KUNG UM ROAD ON LOT NO. 4066 IN D.D. 120

Drawing Number :
S16_1F_PF

Revision Number :
-

Project No.
25092NT

File Path :
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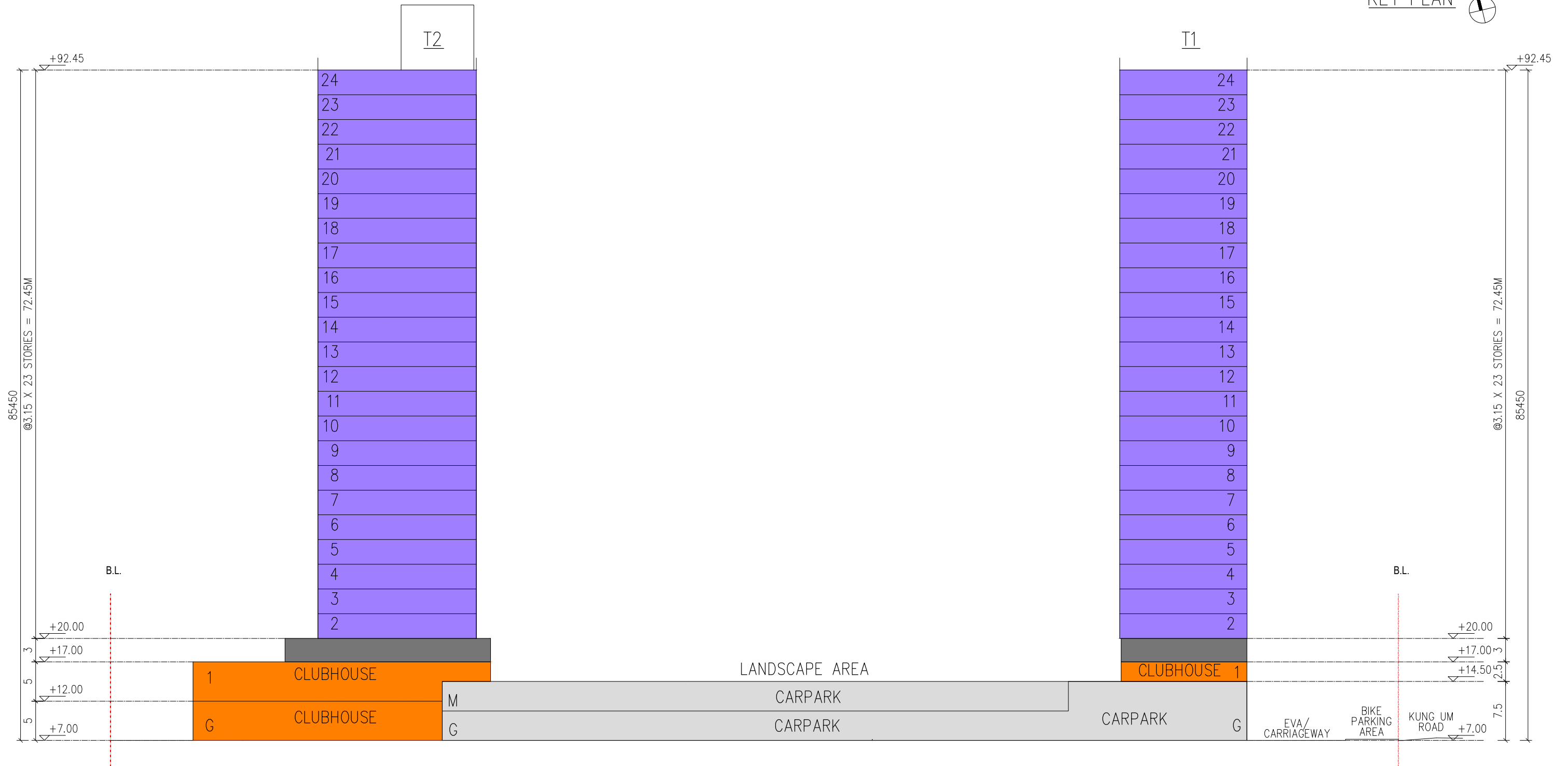
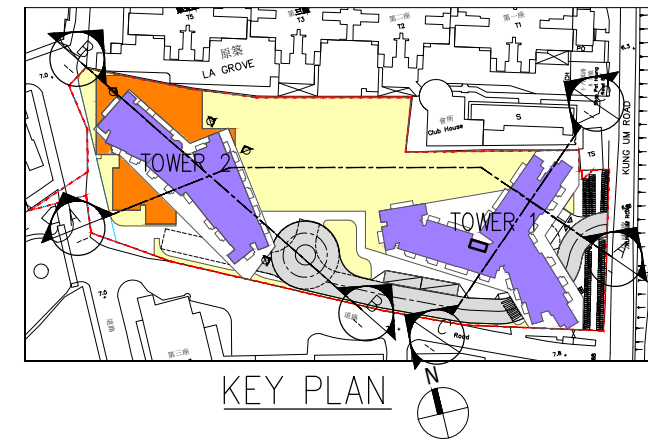
Issue Date
MAR/26



呂元祥建築師事務所

PROPOSED SCHEME LEGEND

- BOUNDARY
- RESIDENTIAL
- CLUBHOUSE
- LANDSCAPE
- E/M
- DRIVEWAY, CARPARK
- PINK HATCH BLUE AREA
- EDGED PECKED BLUE AREA FOR DEFERRED POSSESSION



SECTION A-A

DIAGRAMMATIC SECTION A-A

1:500

PROPOSED RESIDENTIAL DEVELOPMENT AT KUNG UM ROAD ON LOT NO. 4066 IN D.D. 120

Drawing Number : S16_SECTION -
Revision Number :

Project No. 25092NT

Issue Date MAR/26



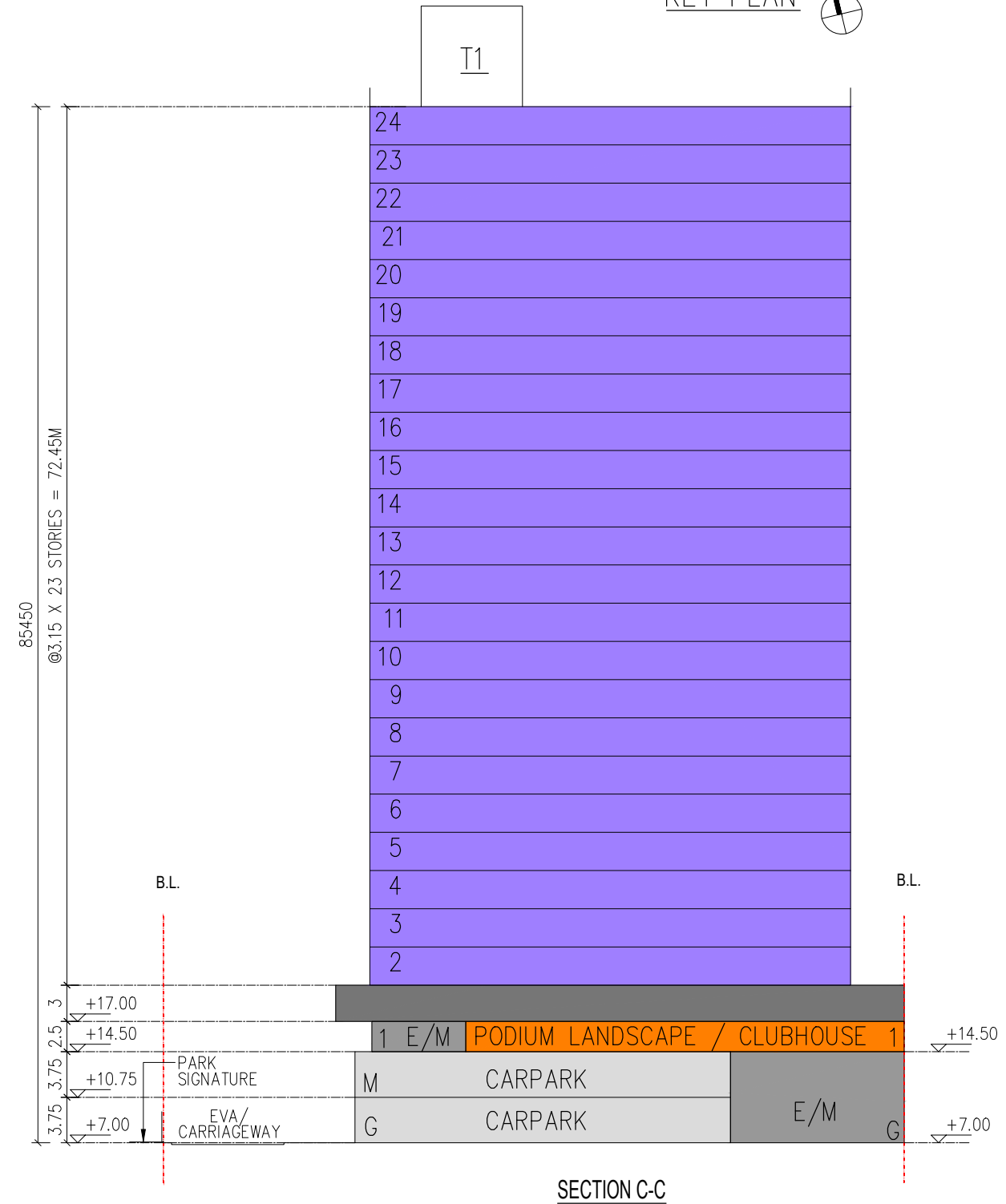
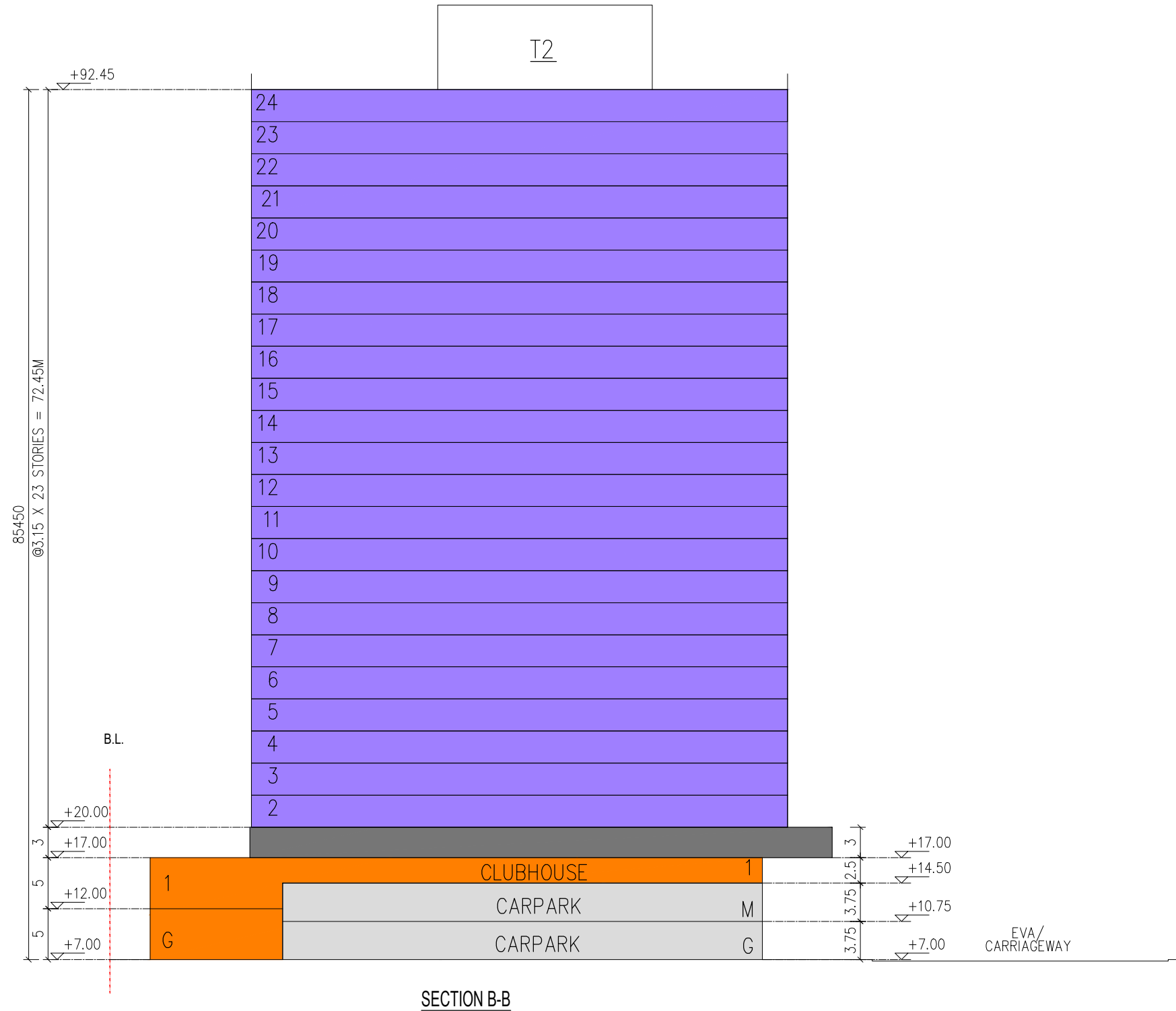
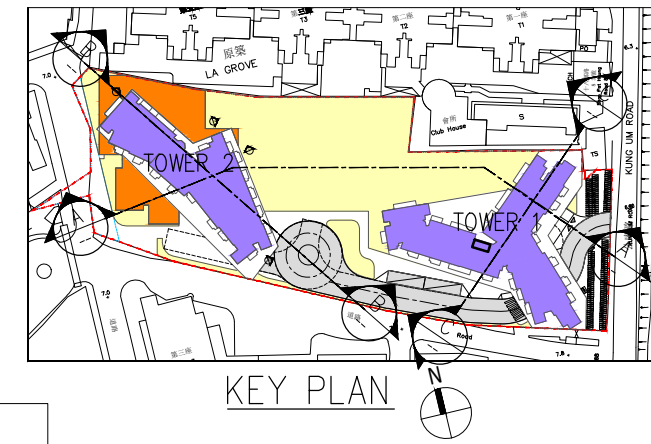
呂元祥建築師事務所

File Path : U:\Studio_VIProj_Data\2025\25092NT Lung Tin Tsuen Phase 2\DRAWING\SUBI\Section 16 application\MODELS\16_SECTION.dwg

PROPOSED SCHEME

LEGEND

- BOUNDARY
- RESIDENTIAL
- CLUBHOUSE
- LANDSCAPE
- E/M
- DRIVEWAY, CARPARK
- PINK HATCH BLUE AREA
- EDGED PECKED BLUE AREA FOR DEFERRED POSSESSION



DIAGRAMMATIC SECTION B-B & SECTION C-C 1:500

PROPOSED RESIDENTIAL DEVELOPMENT AT KUNG UM ROAD ON LOT NO. 4066 IN D.D. 120



呂元祥建築師事務所

Drawing Number : S16_SECTION -
Revision Number :

Project No.

25092NT

Issue Date

MAR/26

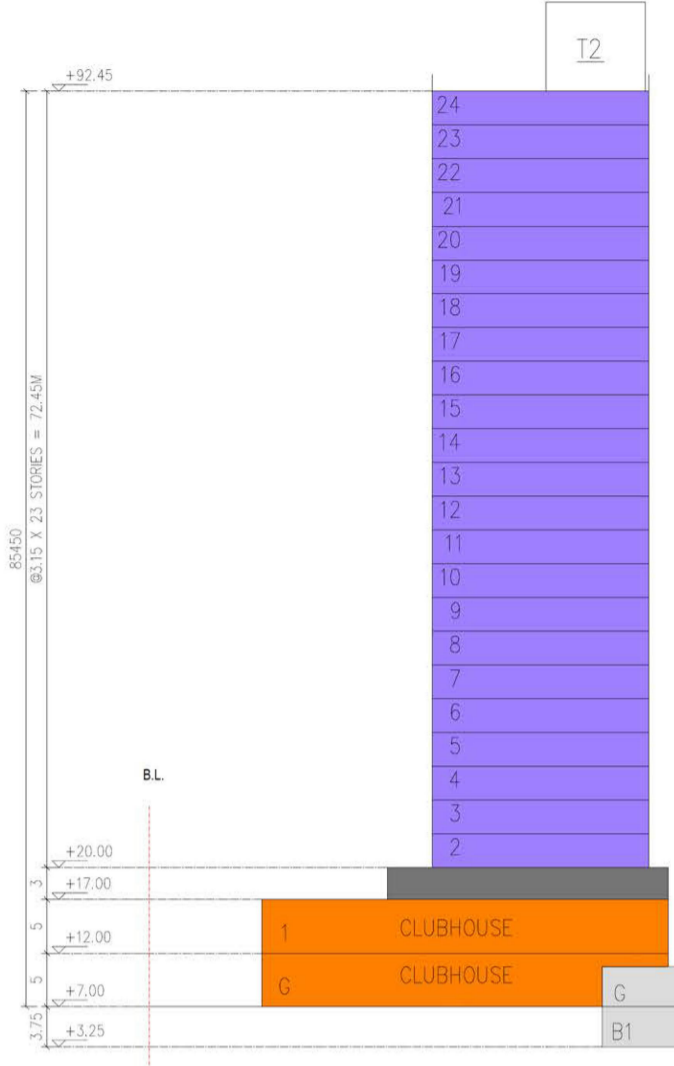
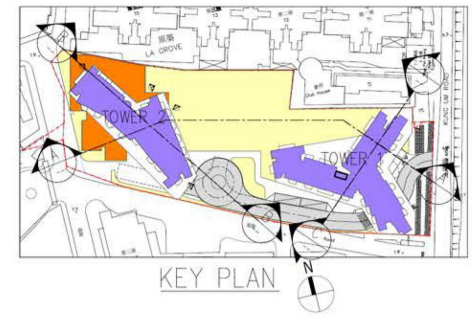
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Appendix 2

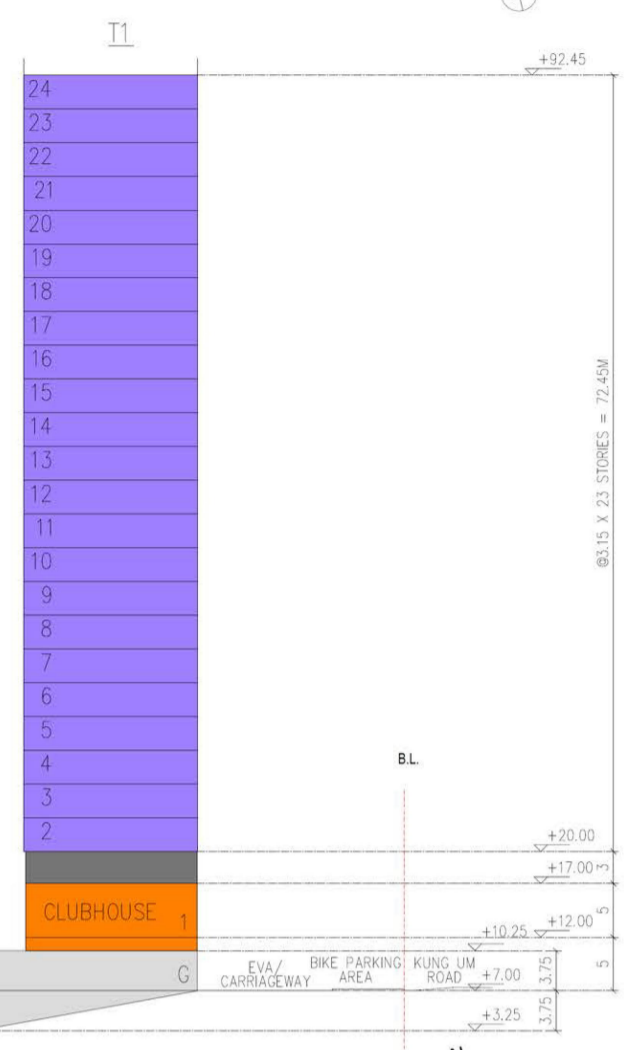
Comparison Plan

CONFORMING SCHEME
LEGEND

- BOUNDARY
- RESIDENTIAL
- CLUBHOUSE
- LANDSCAPE
- E/M
- DRIVEWAY, CARPARK
- PINK HATCH BLUE AREA
- EDGED PECKED BLUE AREA FOR DEFERRED POSSESSION



SECTION A-A



DIAGRAMMATIC SECTION A-A 1:500

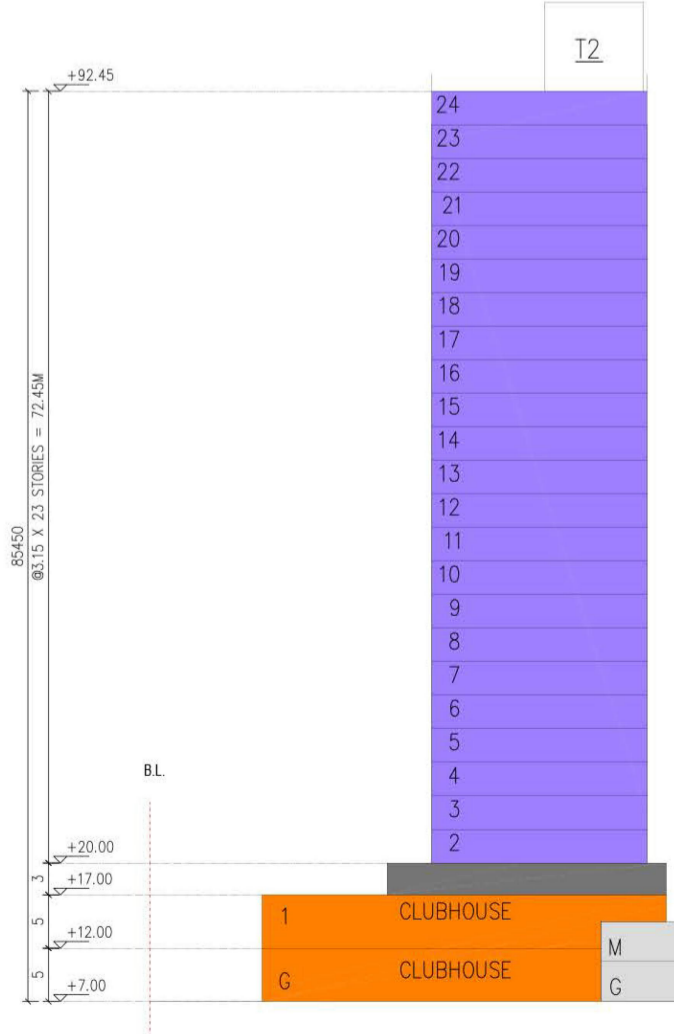
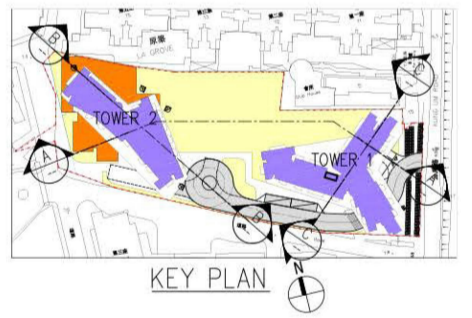
PROPOSED RESIDENTIAL DEVELOPMENT
AT KUNG UM ROAD ON LOT NO. 4066 IN D.D. 120

Drawing Number : S16_SECTION - Revision Number : Project No. 25092NT Issue Date MAR/26
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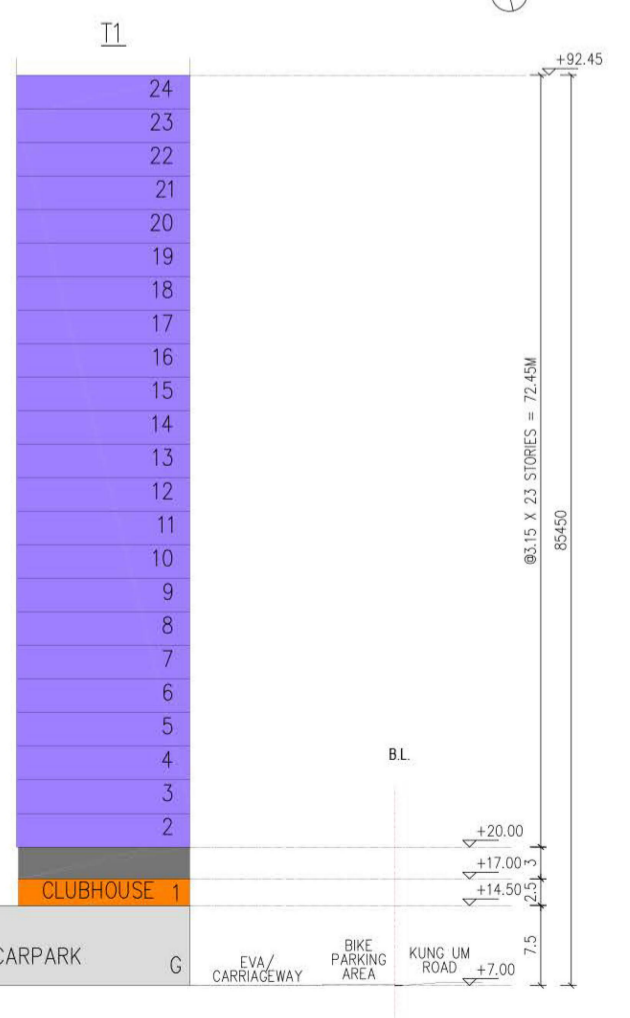


PROPOSED SCHEME
LEGEND

- BOUNDARY
- RESIDENTIAL
- CLUBHOUSE
- LANDSCAPE
- E/M
- DRIVEWAY, CARPARK
- PINK HATCH BLUE AREA
- EDGED PECKED BLUE AREA FOR DEFERRED POSSESSION



SECTION A-A



DIAGRAMMATIC SECTION A-A 1:500

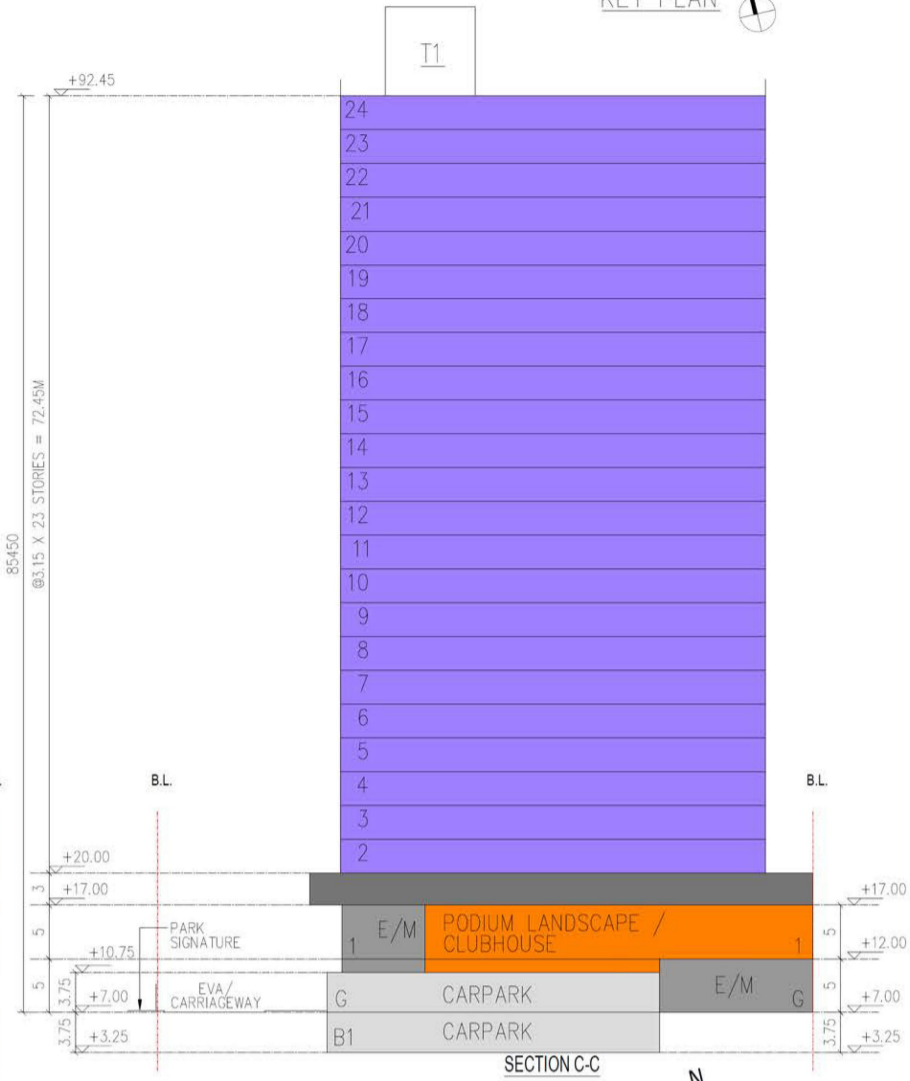
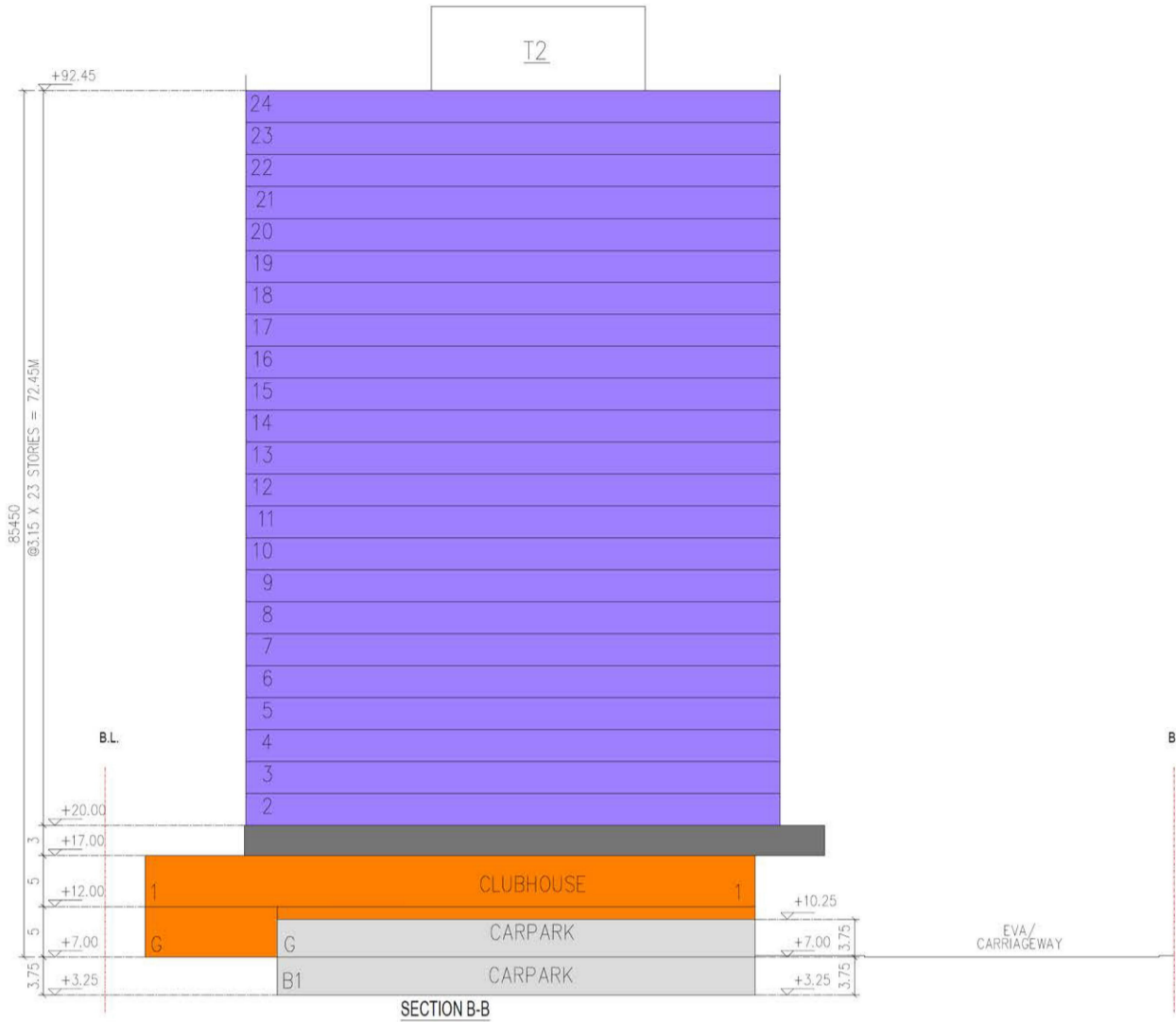
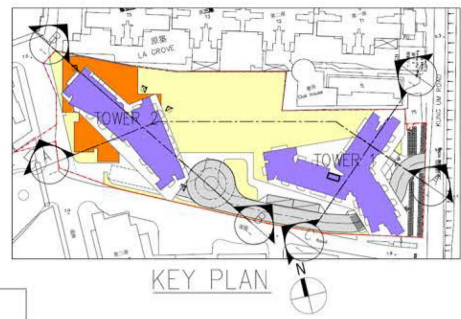
PROPOSED RESIDENTIAL DEVELOPMENT
AT KUNG UM ROAD ON LOT NO. 4066 IN D.D. 120

Drawing Number : S16_SECTION - Revision Number : Project No. 25092NT Issue Date MAR/26
 File Path : U:\Studio_V\Proj_Data\2025\25092NT Lung Tin Tsuen Phase 2\DRAWING\SUB\Section 16 application\MODEL\S16_SECTION.dwg



CONFORMING SCHEME
LEGEND

- BOUNDARY
- RESIDENTIAL
- CLUBHOUSE
- LANDSCAPE
- E/M
- DRIVEWAY, CARPARK
- PINK HATCH BLUE AREA
- EDGED PECKED BLUE AREA FOR DEFERRED POSSESSION



DIAGRAMMATIC SECTION B-B & SECTION C-C 1:500

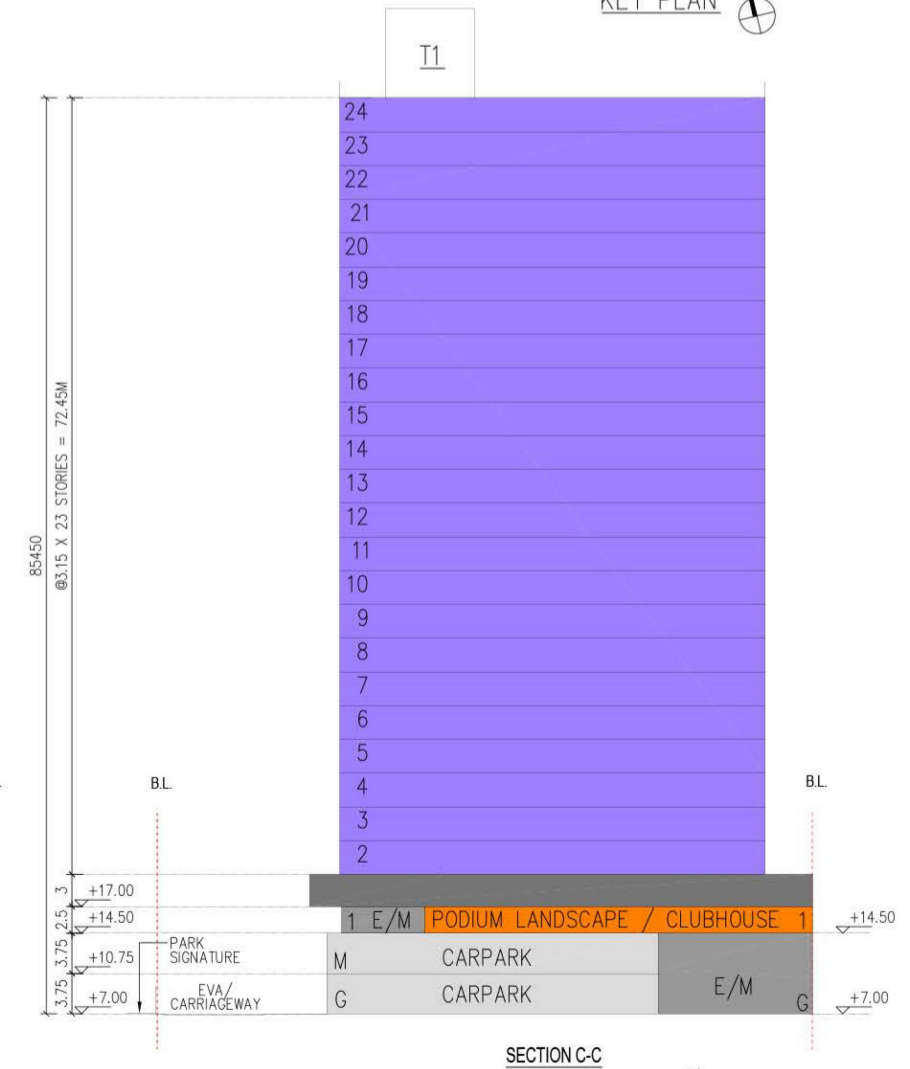
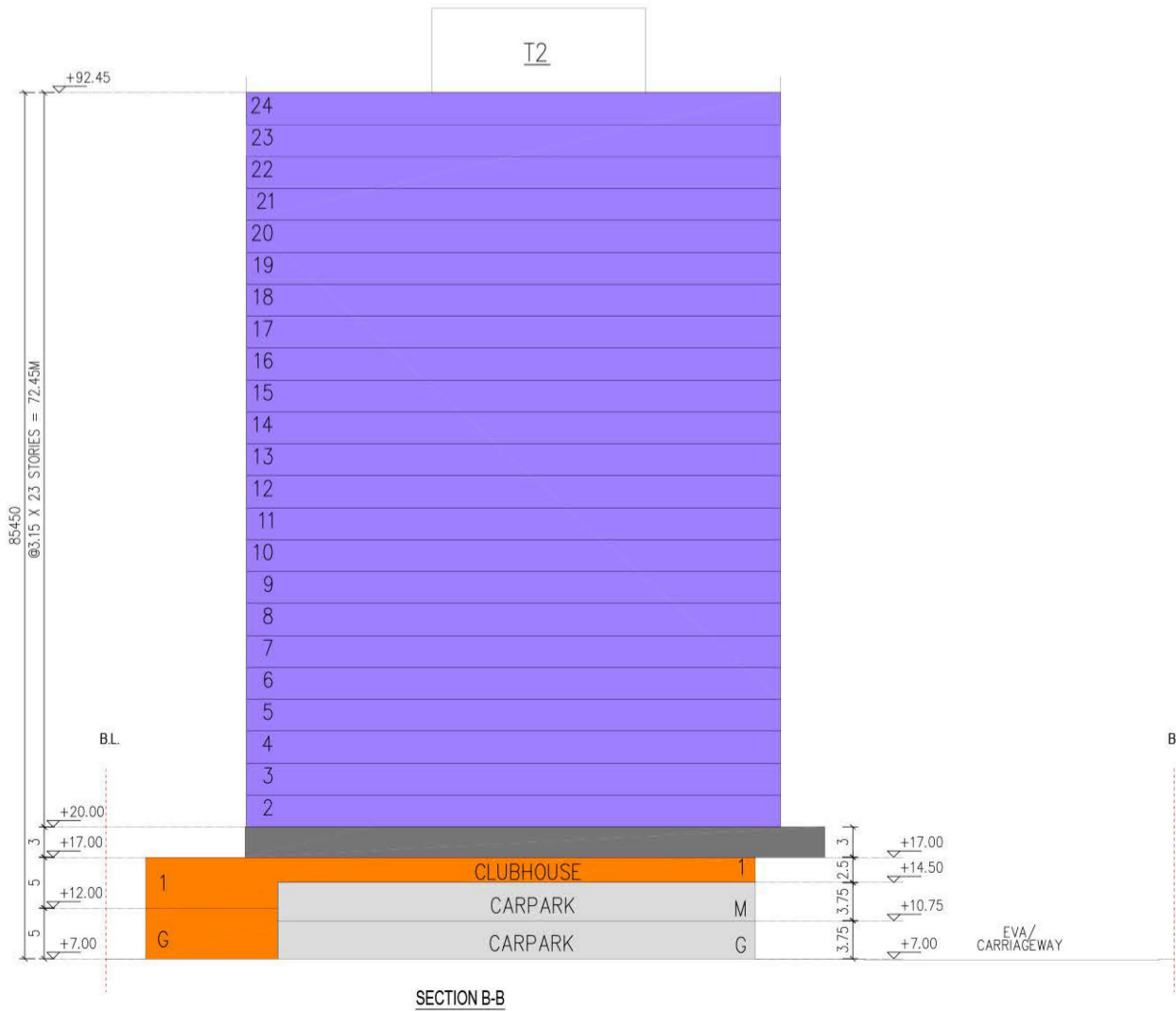
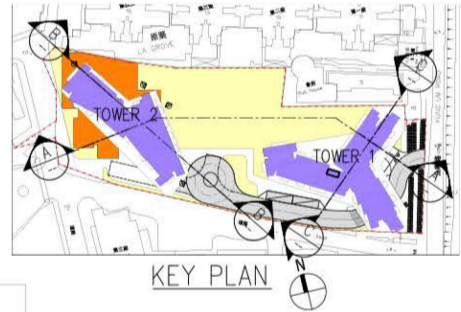


PROPOSED RESIDENTIAL DEVELOPMENT
AT KUNG UM ROAD ON LOT NO. 4066 IN D.D. 120

Drawing Number : S16_SECTION - Revision Number : Project No. 25092NT Issue Date MAR/26
File Path : U:\Studio_VProj_Data\2025\25092NT Lung Tin Tsuen Phase 2\DRAWINGS\SUB\Section 16\application\MODELS16_SECTION.dwg

PROPOSED SCHEME
LEGEND

- BOUNDARY
- RESIDENTIAL
- CLUBHOUSE
- LANDSCAPE
- E/M
- DRIVEWAY, CARPARK
- PINK HATCH BLUE AREA
- EDGED PECKED BLUE AREA FOR DEFERRED POSSESSION



DIAGRAMMATIC SECTION B-B & SECTION C-C 1:500



PROPOSED RESIDENTIAL DEVELOPMENT
AT KUNG UM ROAD ON LOT NO. 4066 IN D.D. 120

Drawing Number : S16_SECTION - Revision Number : Project No. 25092NT Issue Date MAR/26
File Path : U:\Studio_VProj_Data\2025\25092NT Lung Tin Tsuen Phase 2\DRAWINGS\SUB\Section 16\application\MODELS16_SECTION.dwg

Appendix 3

Replacement Pages of Application Form

(iv) For Type (iv) application 供第(iv)類申請

- (a) Please specify the proposed minor relaxation of stated development restriction(s) and **also fill in the proposed use/development and development particulars in part (v) below** –
請列明擬議略為放寬的發展限制並填妥於第(v)部分的擬議用途/發展及發展細節 –

- Plot ratio restriction 地積比率限制 From 由 to 至
- Gross floor area restriction 總樓面面積限制 From 由sq. m 平方米 to 至sq. m 平方米
- Site coverage restriction 上蓋面積限制 From 由% to 至 %
- Building height restriction 建築物高度限制
From 由m 米 to 至 m 米
From 由 mPD 米 (主水平基準上) to 至mPD 米 (主水平基準上)
From 由 **25** storeys 層 to 至 **26** storeys 層
- Non-building area restriction 非建築用地限制 From 由m to 至 m
- Others (please specify) 其他 (請註明)

(v) For Type (v) application 供第(v)類申請

(a) Proposed use(s)/development
擬議用途/發展

**Proposed Minor Relaxation of Building Height Restriction
for Permitted Flat Development**

(Please illustrate the details of the proposal on a layout plan 請用平面圖說明建議詳情)

(b) Development Schedule 發展細節表

- Proposed gross floor area (GFA) 擬議總樓面面積 **41,175** sq.m 平方米 About 約
- Proposed plot ratio 擬議地積比率 **5.0** About 約
- Proposed site coverage 擬議上蓋面積 **Not more than 25** % About 約
- Proposed no. of blocks 擬議座數 **2**
- Proposed no. of storeys of each block 每座建築物的擬議層數 **26 storeys**
- include 包括.....storeys of basements 層地庫
- exclude 不包括.....storeys of basements 層地庫
- Proposed building height of each block 每座建築物的擬議高度 **92.45** mPD 米(主水平基準上) About 約
- **85.45** m 米 About 約

(iii) Building height/No. of storeys 建築物高度／層數	Domestic 住用	About 85.45 m 米 <input type="checkbox"/> (Not more than 不多於)	
		About 92.45 mPD 米(主水平基準上) <input type="checkbox"/> (Not more than 不多於)	
		about 26 storeys Storeys(s) 層 <input type="checkbox"/> (Not more than 不多於) <input checked="" type="checkbox"/> Include 包括 <input type="checkbox"/> Exclude 不包括 <input type="checkbox"/> Carport 停車間 <input type="checkbox"/> Basement 地庫 <input type="checkbox"/> Refuge Floor 防火層 <input checked="" type="checkbox"/> Podium 平台)	
	Non-domestic 非住用	m 米 <input type="checkbox"/> (Not more than 不多於)	
		mPD 米(主水平基準上) <input type="checkbox"/> (Not more than 不多於)	
		Storeys(s) 層 <input type="checkbox"/> (Not more than 不多於) <input type="checkbox"/> Include 包括 <input type="checkbox"/> Exclude 不包括 <input type="checkbox"/> Carport 停車間 <input type="checkbox"/> Basement 地庫 <input type="checkbox"/> Refuge Floor 防火層 <input type="checkbox"/> Podium 平台)	
	Composite 綜合用途	m 米 <input type="checkbox"/> (Not more than 不多於)	
		mPD 米(主水平基準上) <input type="checkbox"/> (Not more than 不多於)	
		Storeys(s) 層 <input type="checkbox"/> (Not more than 不多於) <input type="checkbox"/> Include 包括 <input type="checkbox"/> Exclude 不包括 <input type="checkbox"/> Carport 停車間 <input type="checkbox"/> Basement 地庫 <input type="checkbox"/> Refuge Floor 防火層 <input type="checkbox"/> Podium 平台)	
(iv) Site coverage 上蓋面積	Not more than 25 % <input type="checkbox"/> About 約		
(v) No. of units 單位數目	1,035		
(vi) Open space 休憩用地	Private 私人	sq.m 平方米 <input type="checkbox"/> Not less than 不少於	
	Public 公眾	sq.m 平方米 <input type="checkbox"/> Not less than 不少於	