

**Previous Applications involving the Application Sites Since the Gazettal of the
First Outline Zoning Plan for Kwu Tung North and Fanling North**

Approved Applications

	Site(s) Involved	Application No.	Proposed Use(s) / Development(s)	Date of Consideration (RNTPC/TPB)
1.	F1 to F8	A/FLN/30	Proposed Minor Relaxation of Plot Ratio (PR) and Building Height (BH) Restrictions for Permitted Public and Private Housing Developments; and Proposed Social Welfare Facilities, Shop and Services and Eating Place within Public Housing Developments	23.9.2022 (approved by RNTPC)
2.	K1 to K12	A/KTN/93	Proposed Minor Relaxation of PR and/or BH Restrictions for Proposed/Permitted Public and Private Housing Developments, and Proposed Shop and Services and Eating Place within Public Housing Developments, and Proposed Public Transport Terminus, Shop and Services and Eating Place uses within a Private Housing Development	23.9.2022 (approved by RNTPC)
3.	F4	A/FLN/32	Proposed Minor Relaxation of PR and BH Restrictions for Permitted Composite Commercial/Residential Development	22.11.2024 (approved by RNTPC)
4.	F4	A/FLN/33	Proposed Minor Relaxation of the Non-building Area Restriction for Proposed Footbridges and Covered Walkways Connecting the Permitted Commercial/ Residential Development	24.10.2025 (approved by RNTPC)

Similar Applications

Approved Applications

	Application No.	Proposed Use(s) / Development(s)	Date of Consideration (RNTPC/TPB)
1.	A/KTN/54	Proposed Minor Relaxation of Plot Ratio (PR) and/or Building Height (BH) Restrictions for 8 Sites in Fanling North and Kwu Tung North New Development Areas and Proposed Residential, Commercial, Government, Institution or Community and Market Development in 2 Areas Shown as 'Road' in Site K1	16.11.2018 (approved by RNTPC)
2.	A/FLN/28	Proposed Minor Relaxation of PR, BH and Non-building Area Restrictions for Permitted Public Housing Development	18.2.2022 (approved by RNTPC)
3.	A/KTN/83	Proposed Minor Relaxation of PR Restriction for Dedicated Rehousing Estate	18.2.2022 (approved by RNTPC)
4.	A/KTN/84	Proposed Minor Relaxation of PR and BH Restrictions for Permitted Public Housing Development	22.4.2022 (approved by RNTPC)
5.	A/KTN/97	Proposed Minor Relaxation of PR and BH Restrictions for Permitted Residential Development	3.3.2023 (approved by RNTPC)

Recommended Advisory Clauses

- (a) to note the comments from Chief Engineer/Construction, Water Supplies Department (WSD) that:
- (i) existing water mains inside the application sites (the Sites) may be affected. The applicant is required to either divert or protect the water mains found on site;
 - (ii) if diversion is required, existing water mains inside the proposed site areas are needed to be diverted outside the site boundary of the Sites to lie in Government land. A strip of land of minimum 1.5m in width should be provided for the diversion of existing water mains. The cost of diversion of existing water mains upon request will have to be borne by the applicant; and the applicant shall submit all the relevant preproposal to WSD for consideration and agreement before the works commence;
 - (iii) if diversion is not required, the following conditions shall apply:
 - existing water mains are affected and no development which requires resiting of water mains will be allowed;
 - details of site formation works shall be submitted to the Director of Water Supplies (DWS) for approval prior to commencement of works;
 - no structures shall be built or materials stored within 1.5m from the centre line(s) of water main(s) shown on the plan. Free access shall be made available at all times for staff of the DWS or their contractor to carry out construction, inspection, operation, maintenance and repair works;
 - no trees or shrubs with penetrating roots may be planted within the Water Works Reserve or in the vicinity of the water main(s). No change of existing site condition may be undertaken within the aforesaid area without the prior agreement of DWS. Rigid root barriers may be required if the clear distance between the proposed tree and the pipe is 2.5m or less, and the barrier must extend below the invert level of the pipe;
 - no planting or obstruction of any kind except turfing shall be permitted within the space of 1.5m around the cover of any valve or within a distance of 1m from any hydrant outlet; and
 - tree planting may be prohibited in the event that the DWS considers that there is any likelihood of damage being caused to water mains.
- (b) to note the comments from the Chief Town Planner/Urban Design and Landscape, Planning Department that the applicant is advised that approval of the application does not imply approval of tree works such as pruning, transplanting and felling. Application for any tree works should be submitted to relevant departments for approval;

- (c) to note the comments from the Director of Fire Services that detailed fire services requirements will be formulated upon receipt of a formal submission of Short Term Tenancy/Short Term Waiver, general building plans or referral of application via relevant licensing authority. Furthermore, the Emergency Vehicular Access provision in the captioned work shall comply with the requirements as stipulated in Section 6, Part D of the Code of Practice for Fire Safety in Buildings 2011, which is administered by the Building Authority;
- (d) to note the comments of the Director of Food and Environmental Hygiene (DFEH) that:
- (i) if any Food and Environmental Hygiene Department's (FEHD) facility is affected by the development, FEHD's prior consent must be obtained. Reprovisioning of the affected facilities by the project proponent up to the satisfaction of FEHD may be required. Besides, the project proponent may be required to provide sufficient amount of additional recurrent cost for management and maintenance of the reprovisioned facilities to FEHD;
 - (ii) if FEHD is requested to take up management responsibility of new facilities, 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;
 - (iii) if provision of cleansing service for new 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;
 - (iv) no environmental nuisance should be generated to the surroundings. Also, for any waste generated from the operations and works, the project proponent should arrange its disposal properly at their own expenses;
 - (v) if the captioned project will lead to significant population increase, sufficient amount of recurrent costs may have to be provided to FEHD in order to provide various types of environmental hygiene services for increased population, such as inspection to food premises, hawker control, handling of complaints, etc.;
 - (vi) 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 refuse collection vehicle to refuse collection point (RCP), should be sought. For any waste generated from the commercial/trading activities, the applicant should handle on their own/at their expenses. The refuses collection points of domestic waste and the commercial waste should be clearly separated. The share use of RCP for both domestic and commercial waste is not recommended;
 - (vii) proper licence / permit issued by FEHD is required if there is any food business / catering service / activities regulated by the DFEH under the Public Health and Municipal Services Ordinance (Cap. 132) and other relevant legislation for the public. Pursuant to section 4 of the Food Business Regulation (Cap. 132X), the expression of "food business" does not include any club and 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 club or a staff canteen is exempted from obtaining food business licence from this department except for permission to sell restricted foods specified in Schedule 2 to the Food Business Regulation. FEHD staff may conduct inspection of the staff canteen / club on regular basis. If the said canteen provided foods to the outsiders with payment, a food business licence is required; and

- (viii) proper licence issued by FEHD 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 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 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.

致城市規劃委員會秘書：

專人送遞或郵遞：香港北角渣華道 333 號北角政府合署 15 樓

傳真：2877 0245 或 2522 8426

電郵：tpbpd@pland.gov.hk

To : Secretary, Town Planning Board

By hand or post : 15/E, North Point Government Offices, 333 Java Road, North Point, Hong Kong

By Fax : 2877 0245 or 2522 8426

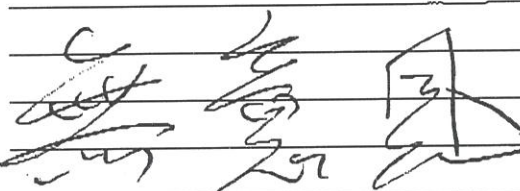
By e-mail : tpbpd@pland.gov.hk

有關的規劃申請編號 The application no. to which the comment relates

A/KTN/111

意見詳情 (如有需要，請另頁說明)

Details of the Comment (use separate sheet if necessary)



「提意見人」姓名/名稱 Name of person/company making this comment

侯志強議員

簽署 Signature



日期 Date

2026-6-18

就規劃申請/覆核提出意見 Making Comment on Planning Application / Review

參考編號

Reference Number:

260618-145002-33795

提交限期

Deadline for submission:

07/07/2026

提交日期及時間

Date and time of submission:

18/06/2026 14:50:02

有關的規劃申請編號

The application no. to which the comment relates:

A/KTN/111

「提意見人」姓名/名稱

Name of person making this comment:

先生 Mr. 彭嘉榮

意見詳情

Details of the Comment :

本人就申請編號 A/KTN/111 (粉嶺北新發展區 F2-F8 一帶放寬地積比率及建築物高度限制) 提交意見，明確表示反對有關申請。

第一，區內人口密度已非常高，原有規劃及相關環評、交通評估等，都是按既定的地積比率及高度限制而制訂。若在此基礎上再放寬 F2-F8 地帶的發展參數，實際上是額外「加入加樓面」，會令整體人口承載超出原來的新發展區規劃上限，增加對醫療、教育、社區設施及公共空間的壓力，削弱居民生活質素。

第二，粉嶺 / 上水及粉嶺北一帶目前交通已十分緊張，繁忙時間道路擠塞、公共交通非常擠迫已是區內居民的日常經驗。雖然政府正興建及規劃多項道路及公共運輸設施，但均是以原訂人口及單位數目為前提。現時在未有新一輪、具透明度的交通影響評估前，便額外提高發展密度，難以確保日後道路及公共交通在尖峰時段仍可承受，存在很大風險。

第三，本人現時居住於 One Innovalle，一帶屬較低密度住宅發展，樓宇高度及布局令區內仍保留一定開揚感及通風。若鄰近 F2-F8 地帶大量加高樓宇及提高地積比率，將造成明顯的壓迫感，遮擋景觀及日照，亦可能影響風環境，與新發展區原先強調營造宜居、以人為本社區的方向不符。居民早前置業時是按照現行規劃作出重大人生及財政決定，現時大幅提高周邊密度，對居民並不公平。

第四，古洞北及粉嶺北新發展區的法定圖則是經多年研究及諮詢後才獲批准，現有地積比率及高度限制是平衡房屋供應、交通承載及環境質素後的結果。任何放寬，都不應視為輕微技術改動，而應被視為實質改變整體規劃前提。若申請人未能提交足以證明額外密度「可被交通及環境承受」的最新交通影響評估、環境及風環境評估、社區設施供求分析等資料，本人認為城規會不應批准該申請。

本人明白並支持在粉嶺北 / 古洞北新發展區增加商業及就業項目，以及改善公共車輛總

站及停車場等交通設施，有助本區創造職位及減少跨區通勤壓力，方向上是正面及必要的。然而，是次 A/KTN/111 申請將上述設施與放寬地積比率及建築物高度、增加大量私營住宅單位「綁在一起」，以增加居住人口作為代價，實屬本末倒置。區內交通及社區設施的承載力只按原有規劃人口設計，如今在沒有充分交通及環境評估的情況下再大幅加密住宅，只會令現有及將來居民飽受人口過度密集、交通擠塞及居住環境被嚴重壓迫之苦。本人支持多一點商業及就業項目、以及合理的交通及停車設施，但堅決反對透過放寬地積比率及高度限制去無限制增加居住人口。

基於上述理由，本人懇請城市規劃委員會拒絕 A/KTN/111 申請，維持現有粉嶺北新發展區 F2-F8 地帶原有的地積比率及建築物高度限制，以保障區內現有及未來居民的生活質素及交通安全。

3

致城市規劃委員會秘書：

專人送遞或郵遞：香港北角渣華道 333 號北角政府合署 15 樓

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有關的規劃申請編號 The application no. to which the comment relates

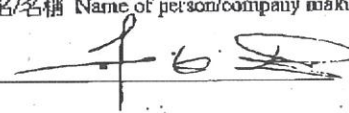
AK/TN/11

意見詳情 (如有需要，請另頁說明)

Details of the Comment (use separate sheet if necessary)

沒有意見

「提意見人」姓名/名稱 Name of person/company making this comment _____

簽署 Signature  日期 Date 24-6-2016

編號 0854

P. 1

22日 6月2020年 9時34分

tpbpd/PLAND

寄件者: [REDACTED]
寄件日期: 2026年07月07日星期二 23:23
收件者: tpbpd/PLAND
主旨: A/KTN/111 Fan Ling North and Kwu Tong NDAs CEDD
類別: Internet Email

A/KTN/111 CEDD

Planning Areas 10NW (including FSSTL No. 307), 13E, 14W, 14S (FSSTL No. 297), 16NW, 16NE, 16SW and 16SE of Fanling North New Development Area; Planning Areas 20E, 25E, 14, 22W, 22E, 26W, 26E, 15N, 15C, 15S, 23N, 23C and 23S of Kwu Tung North New Development Area

Site area: About 331,632sq.m (Includes Government Land of about 308,056sq.m)

Fanling North Portion: About 102,667sq.m (Includes Government Land of about 79,091sq.m)

Kwu Tung North Portion About 228,965sq.m (Includes Government Land of about 228,965 sq.m)

Zoning:

FLN OPX: "Res (Group A) 1", "Res (Group A) 3", "Res (Group B)" and "Other Specified Uses" annotated "Commercial/Residential Development with PTI"

KTN OZP: "Res (Group A) 1", "Res (Group B)", "Green Belt" and area shown as 'Road'

Proposed Relaxation MR and BHR Private Housing Developments and PTI / 20 Towers – 22,380 Units / Shop and Services and Eating Place. PR 7.2 / 155 – 135mPD.

Dear TPB Members,

So a 20% increase in PR and up to almost 20mta in height.

"Being situated adjacent to Ng Tung River with hilly terrain to the north, FLN NDA is planned to be developed as a 'Riverside Community' capitalising on the riverside setting, beautiful scenery and hilly backdrop."

Really, any view of the hilly backdrop that was retained under the approved plan will be wiped out by the profusion of even taller ugly monotonous towers.

The consultants must be laughing all the way to the bank as they know that all these CEDD developments will be incrementally increased in PR and BH that require hundreds of pages of updated assessments in order to demonstrate that the outcome will only be more slightly adverse.

☐Urgent ☐Return receipt ☐Expand Group ☐Restricted ☐Prevent Copy

*"The Indicative Layouts present various design features to mitigate the impact arising from the increase in BHs. For instance, **sufficient building separations will be maintained** to enhance airflow, improve street-level environmental quality, and mitigate urban heat island effect. The building separations would also enhance visual permeability and reduce the perceivable building bulk, preserving a more open and visually porous urban environment. The NBAs stipulated at the Application Sites are respected to retain their strategic functions in facilitating prevailing winds penetrating through the Application Sites and reaching the downstream areas. Furthermore, for Application Sites that were assumed with podium-free development, the proposed podium carparks are also broken down with adequate building separation as far as practicable to minimise the impact on air ventilation performance at the pedestrian level"*

But these building separations were already indicated in the previous plan. The site size remains the same so this is playing with words. That the visibility will be enhanced is risible as putting the parking above ground will crease higher and mor bulky podiums and result in a more claustrophobic wall effect. More over parking lots are lit 24/7 creating light pollution and their exterior walls are ugly.

The increases are solely intended to reduce construction costs at the expense of providing a pleasant environment at street level and to increase the number of units and revenue. Note that no data is provided with regard to changes in the number of units or their dimensions.

We are not fooled but of course the application will be streamlined and rubber stamped in line with similar previous applications.

Mary Mulvihill

致城市規劃委員會秘書：

Seq.1 5

專人送遞或郵遞：香港北角渣華道 333 號北角政府合署 15 樓

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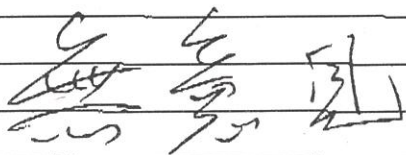
By e-mail : tpbpd@pland.gov.hk

有關的規劃申請編號 The application no. to which the comment relates

A/KTN/111 Received on 26/08/2026

意見詳情 (如有需要，請另頁說明)

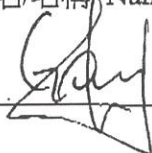
Details of the Comment (use separate sheet if necessary)



「提意見人」姓名/名稱 Name of person/company making this comment

侯志強 謹啟

簽署 Signature



日期 Date

2026-9-1

就規劃申請/覆核提出意見 Making Comment on Planning Application / Review**參考編號**

260902-110302-95075

Reference Number:**提交限期**

18/09/2026

Deadline for submission:**提交日期及時間**

02/09/2026 11:03:02

Date and time of submission:**有關的規劃申請編號**

A/KTN/111

The application no. to which the comment relates:**「提意見人」姓名/名稱**

小姐 Miss Jovalina Ho

Name of person making this comment:**意見詳情****Details of the Comment :**

Comprehensive Analysis: Statutory Planning Mechanisms and Land Allocation for Kwu Tung North Areas 32 and 34 in Relation to Planning Application No. A/KTN/111

Introduction

The statutory planning and land development framework for the New Development Areas in the Northern Metropolis involves distinct administrative, statutory, and executive procedures. When reviewing Town Planning Board Application No. A/KTN/111—which seeks a minor relaxation of plot ratio and building height restrictions across multiple planning areas in Fanling North and Kwu Tung North—a recurring query is why Kwu Tung North Planning Areas 32 and 34 are not included alongside Fanling North Area 14W. More specifically, questions arise as to whether the omission of Areas 32 and 34 signals a change in the Government's policy commitment to grant three dedicated land parcels to the Urban Renewal Authority. A detailed examination of the planning history reveals that their omission is purely a reflection of differing statutory Outline Zoning Plan mechanisms rather than any cancellation of land allocation, confirming that the commitment to grant all three sites to the Authority remains intact.

The Policy Context of Land Allocation to the Urban Renewal Authority

As detailed in Government policy addresses and Legislative Council Development Panel papers, the Government formulated a land-grant strategy to support the Urban Renewal Authority's long-term urban regeneration efforts. Under this initiative, the Government identified three dedicated sites across the Kwu Tung North and Fanling North New Development Areas, comprising approximately four hectares in total. These parcels are earmarked for the Authority to construct dedicated rehousing and replacement units, thereby reinforcing the viability of its "Flat-for-Flat" Scheme and facilitating the decanting of affected residents from aging urban districts.

The three identified parcels comprise:

Fanling North Area 14W, situated within the Fanling North New Development Area.

Kwu Tung North Area 32, located along the Sheung Yue River corridor in the western sector of Kwu Tung North.

Kwu Tung North Area 34, situated adjacent to Area 32 in the same western corridor.

Statutory Planning Pathways: Why Area 14W is Included but Areas 32 and 34 are Omitted

The fundamental reason why Fanling North Area 14W appears in Application No. A/KTN/111 while Kwu Tung North Areas 32 and 34 are absent lies in their respective Outline Zoning Plan histories and the exact statutory mechanism utilized to implement the Government's policy of uplifting development intensity by twenty percent.

For Kwu Tung North Areas 32 and 34, the sites were originally zoned as "Other Specified Uses" annotated "Business and Technology Park" with a base plot ratio of 3.0. When the Government subsequently restructured the land use to provide residential capacity, these two plots underwent a comprehensive, formal rezoning exercise under the Outline Zoning Plan to "Residential (Group B) 1". As part of that formal plan amendment, the enhanced maximum domestic plot ratio of 4.2—incorporating the full twenty percent intensity uplift—was written directly into the statutory Schedule of Notes of the approved Outline Zoning Plan. Because the statutory maximum plot ratio of 4.2 is already legally secured within the plan itself, there is no legal basis or necessity to include Areas 32 and 34 in a Section 16 minor relaxation application.

In contrast, Fanling North Area 14W, along with the other sites listed in Application No. A/KTN/111, was already zoned for residential development under earlier Outline Zoning Plan baselines with a standard plot ratio of 3.5. To implement the twenty percent density increase to a plot ratio of 4.2 without undertaking a lengthy, full-scale Outline Zoning Plan amendment for every individual site, the authorities submitted a Section 16 application for minor relaxation. Thus, Area 14W requires the approval of Application No. A/KTN/111 to achieve the plot ratio of 4.2, whereas Areas 32 and 34 have already achieved that statutory ceiling through their prior rezoning.

Distinction Between Statutory Planning Controls and Land Allocation Mechanisms

When preparing representations or comments regarding Town Planning Board matters, it is vital to distinguish between statutory planning control under the Town Planning Ordinance and administrative land allocation executed by the Lands Department and the Executive.

A Section 16 planning application addresses purely technical and urban planning considerations, such as infrastructural capacity, traffic impact, visual compatibility, and building massing. The presence or absence of a land parcel in a planning application does not confer, alter, or revoke land ownership, lease conditions, or government land allocation commitments. The administrative allocation of Areas 32, 34, and 14W to the Urban Renewal Authority is managed through executive policy directives and future private treaty grant procedures. The fact that Areas 32 and 34 do not require planning relaxation under Section 16 has no negative implication whatsoever on their planned allocation to the Authority.

Conclusion

In summary, the non-inclusion of Kwu Tung North Planning Areas 32 and 34 in Application No. A/KTN/111 is the result of proper statutory procedure: both sites already possess full statutory entitlement to build up to a plot ratio of 4.2 under their gazetted "Residential (Group B) 1" zoning notes. Their exclusion does not indicate that the sites will not be granted to the Urban Renewal Authority. All three designated parcels across Kwu Tung North and Fanling North remain allocated under prevailing Government policy for the Authority's replacement housing initiatives.

P. 1

編號0944

致城市規劃委員會秘書：

專人送遞或郵遞：香港北角渣華道333號北角政府合署15樓

傳真：2877 0245 或 2522 8426

電郵：tpbpd@pland.gov.hk

To : Secretary, Town Planning Board

By hand or post : 15/F, North Point Government Offices, 333 Java Road, North Point, Hong Kong

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P.001

有關的規劃申請編號 The application no. to which the comment relates

A/KTN/111 Received on 26/08/2026

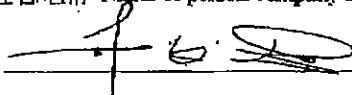
意見詳情 (如有需要，請另頁說明)

Details of the Comment (use separate sheet if necessary)

沒有意見

「提意見人」姓名/名稱 Name of person/company making this comment

簽署 Signature



日期 Date

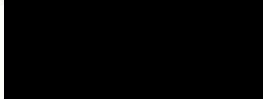
10/9/2026

10日 9月2026年 15時01分

10-SEP-2026 15:23

Keep York Limited

c/o Project Management Department
Sun Hung Kai Real Estate Agency Limited



Our Ref: PM-457/B-36

15th September, 2026

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



Dear Sirs,

Re: Comments on S16 Planning Application for Proposed Minor Relaxation of Plot Ratio and Building Height Restrictions for Proposed / Permitted Private Housing Development and Proposed Public Transport Terminus, Shop and Services and Eating Place within a Permitted Private Housing Development at Planning Areas 10NW (incl. FSSTL No. 307), 13E, 14W, 14S (FSSTL No. 297), 16NW, 16NE, 16SW and 16SE of Fanling North New Development Area; Planning Areas 20E, 25E, 14, 22W, 22E, 26W, 26E, 15N, 15C, 15S, 23N, 23C and 23S in Kwu Tung North New Development Area, New Territories
(Application No. A/KTN/111)

Reference is made to the Further Information (FI) submitted under the captioned planning application and received by the Town Planning Board (the Board) on 26.8.2026.

We are Keep York Limited, the current registered landowner of FSSTL No. 307, i.e. **Planning Area 10NW** of the Fanling North New Development Area (FLN NDA) or **Site F1** under the captioned planning application (hereafter referred to as the 'Subject Site'), which is one of the private housing sites included in the captioned application. We write to express our strong objection to the latest Further Information (received by the Board on 26.8.2026) submitted by the Civil Engineering & Development Department (CEDD) for the captioned application. Our grounds are set out below:-

1. **Proposed Minor Relaxation of Building Height (BH) Should Provide Genuine and Sufficient Flexibility for the Future Development**

It is understood that the captioned planning application submitted by CEDD is to seek minor relaxation of BH restrictions for various housing sites in FLN NDA and Kwu Tung North NDA, with a view to allowing flexibility for future housing developments to adopt the Modular Integrated Construction (MiC) method and/or the aboveground carpark structure.

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We generally support the objective of relaxing the BH restrictions as proposed in the current planning application from CEDD to allow a greater design flexibility for private housing within the Application Sites. However, we strongly object to the latest FI submission which specifies different maximum building heights permissible only on particular or specific conditions, e.g. adoption of a particular construction method (e.g. MiC construction method) and/or adoption of a particular podium structure (e.g. podium incorporating the aboveground carpark) for each Application Site. We consider the proposed BH relaxation for a new town extension like the FLN NDA should be broadbrush in nature to reflect a general situation or a general trend of a higher building height required for the adoption of new construction methods and/or a new building / podium design in housing development. The proposed relaxation should not involve “micro-control” on the magnitude of change in BH under particular construction method(s) or podium design(s) adopted. We consider the BH relaxation should offer genuine design flexibility for future housing developments within the Application Sites to meet the market needs and public aspirations on better living environment, thereby addressing the housing needs.

2. Assumed Floor-to-Floor (F-t-F) Heights are Unduly Restrictive and not Aligned with Prevailing Market Trends

It is noted that the assumed floor-to-floor (F-t-F) heights (for both residential and non-residential floors) adopted in the latest FI submission from CEDD to formulate the proposed BH for all the Application Sites appear to be on the low side.

Residential Floors

A F-t-F height of 3.15m is assumed for residential floors without the adoption of the MiC method, whereas a F-t-F height of 3.3m is assumed for residential floors with the adoption of the MiC method. Obviously, such assumptions on F-t-F heights fail to cater to the latest residential market trends and public's aspirations for better living environment. As a matter of fact, the recently completed private residential developments in different districts across Hong Kong with higher F-t-F heights have increasingly been adopted and well-received in the property market. Some examples are provided below:-

HAVA in Yuen Long, completed in 2025, provides a typical residential F-t-F height of 3.5m and top-floor heights ranging from 3.7m to 4.35m.

Nexus Grand in Fanling, completed in 2025, provides a typical residential F-t-F height of 3.5m and a top-floor height of 4m.

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Bondlane in Cheung Sha Wan, completed in 2024, provides a typical residential F-t-F height of 3.5m.

The Holborn in Quarry Bay, completed in 2023, provides a typical residential F-t-F height of 3.5m and a top-floor height of 3.8m.

The above examples (particularly Nexus Grand in Fanling, which is in close proximity to the Application Sites and shares similar local characteristics) demonstrate that a typical residential F-t-F height of 3.5m is a practical and relevant market standard adopted in the recent years. Therefore, the FI submission from CEDD should adopt a comparable residential F-t-F height in formulating their BH relaxation proposal for the Application Sites to provide sufficient capacity for future housing developments. It should be emphasized that the typical residential F-t-F height of 3.5m is a permissible floor height promulgated under PNAP APP-5 by the Buildings Department. The adoption of which in the BH relaxation exercise is reasonable and well responds to the prevailing market trends. It would allow greater design flexibility for future housing developments on the Application Sites and improve the quality of indoor living environments.

Non-residential Floors

Similarly, we consider the F-t-F height assumptions for non-residential storeys should better reflect the practical requirements of the latest private residential developments. In particular, the assumption of 4m F-t-F height for car parks as adopted in the FI submission from CEDD is considerably below the prevailing market standard. The assumption fails to take into account of the genuine need of provision of sufficient height to accommodate various structural beams and essential mechanical, electrical and plumbing systems. A F-t-F height of approximately 5m should therefore be adopted by CEDD in the FI submission for the carpark floors to better align with current market practice and the practical realities of private residential developments.

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3. **Proposed BH Relaxation Should Not Be Lower than the Original BH Restriction under the Outline Zoning Plan (OZP) or Undermine the Existing Development Entitlements**

It is also noteworthy that, as stated / substantiated in the latest FI submission from CEDD, the propose BH relaxation for some of the Application Sites under different development scenarios would result in a maximum BH which is even lower than the original maximum BH as of right permitted under the current OZP. For example, as illustrated in Table 3.1.2 of the Planning Statement included in the FI submission, for the Subject Site (i.e. Site F1, which is owned by us with land exchange executed and the relevant GBP approved for residential development), the proposed maximum BH permissible under a scenario of “adopting MiC method” is only 75mPD, which is lower than 80mPD permitted as of right under the current OZP for the same site. Similar situation of “the proposed maximum BHs lower than the as-of-right permitted maximum BHs” is observed for Sites K5, K6 and K11, where the proposed maximum BHs under the scenario of adopting MiC method are only 73mPD, 73mPD and 83mPD respectively, which are all lower than the OZP permitted maximum BH of 75mPD, 75mPD and 90mPD respectively. (Please refer to paragraph 3.1.5 of the Planning Statement included in the FI clearly submission states that “*In the event that the future developers of the Application Sites elect to pursue either the incorporation of aboveground carpark or adoption of MiC method only, reduction in corresponding BH may be required to the Proposed BH.*”)

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Table 3.1.2 Proposed BH under Scenarios of Adopting MiC Method Only or Adopting Aboveground Carpark Only

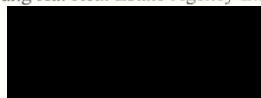
Site	Planning Area	Permissible BH*	Proposed BH	Proposed BH under Scenario of Adopting MiC Method Only*	Proposed BH under Scenario of Adopting Aboveground Carpark Only*
F1	10NW	80mPD	85mPD	75mPD	83mPD
F2	13E	75mPD	95mPD	83mPD	91mPD
F3	14W	110mPD	135mPD	120mPD	126mPD
F4	14S	115mPD	155mPD	144.14mPD [®]	147mPD
F5	16NW	110mPD	135mPD	122mPD	127mPD
F6	16NE	110mPD	135mPD	122mPD	127mPD
F7	16SW	110mPD	135mPD	122mPD	127mPD
F8	16SE	110mPD	135mPD	122mPD	127mPD
K1	20E	115mPD	130mPD	119mPD	125mPD
K2	25E	115mPD	130mPD	120mPD	126mPD
K3	14	80mPD	110mPD	95mPD	103mPD
K4a	22W	75mPD	95mPD	83mPD	92mPD
K4b	22E	75mPD	95mPD	83mPD	92mPD
K5	26W	75mPD	85mPD	73mPD	82mPD
K6	26E	75mPD	85mPD	73mPD	82mPD
K7	15N	85/95mPD	115mPD	101mPD	110mPD
K8	15C	85mPD	105mPD	90mPD	99mPD
K9	15S	80mPD	95mPD	82mPD	91mPD
K10	23N	95mPD	115mPD	112mPD	108mPD
K11	23C	90mPD	95mPD	83mPD	92mPD
K12	23S	90mPD	90mPD ^s	N/A	N/A

3.1.5 In the event that the future developers of the Application Sites elect to pursue either the incorporation of aboveground carpark or adoption of MiC method only, reduction in corresponding BH may be required to the Proposed BH as indicated under Table 3.1.1. For avoidance of doubt, Table 3.1.2 furnishes the Proposed BH under the scenario where only MiC method is adopted and where only aboveground carpark is adopted.

Extract of the Revised Planning Statement submitted under the Further Information received by the Board on 26.8.2026 of the captioned planning application

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Such an arrangement is considered illogical and defeats the purpose of the captioned planning application. The purpose of the application should be to provide reasonable flexibility for future development to adopt MiC method and/or incorporate aboveground carparks, rather than to prejudice the development entitlement already permissible under the extant OZP. In particular, the planning application should not lead to a situation where the future development is subject to a maximum BH lower than that permitted under the current OZP merely because the developer elects to adopt either MiC method or aboveground carparks only. Such an outcome would in effect undermine the future developer's ability to pursue development up to permissible BH, and would be contrary to the objective of providing greater design flexibility. The proposed BH should therefore not be lower than the original maximum BH permissible under the OZP in any scenario for any of the Application Sites (e.g. for the Subject Site, the proposed BHs under all scenarios should be equal to or greater than 80mPD). Furthermore, even if the future developers of the Application Sites elect to pursue either the incorporation of aboveground carpark or adoption of MiC method only, there should not be any requirement to reduce the corresponding BH below the level already permitted under the extant OZP.

4. Proposed BH for the Subject Site is Not Aligned with the Surrounding BH Context and Stepped BH Profile in FLN NDA

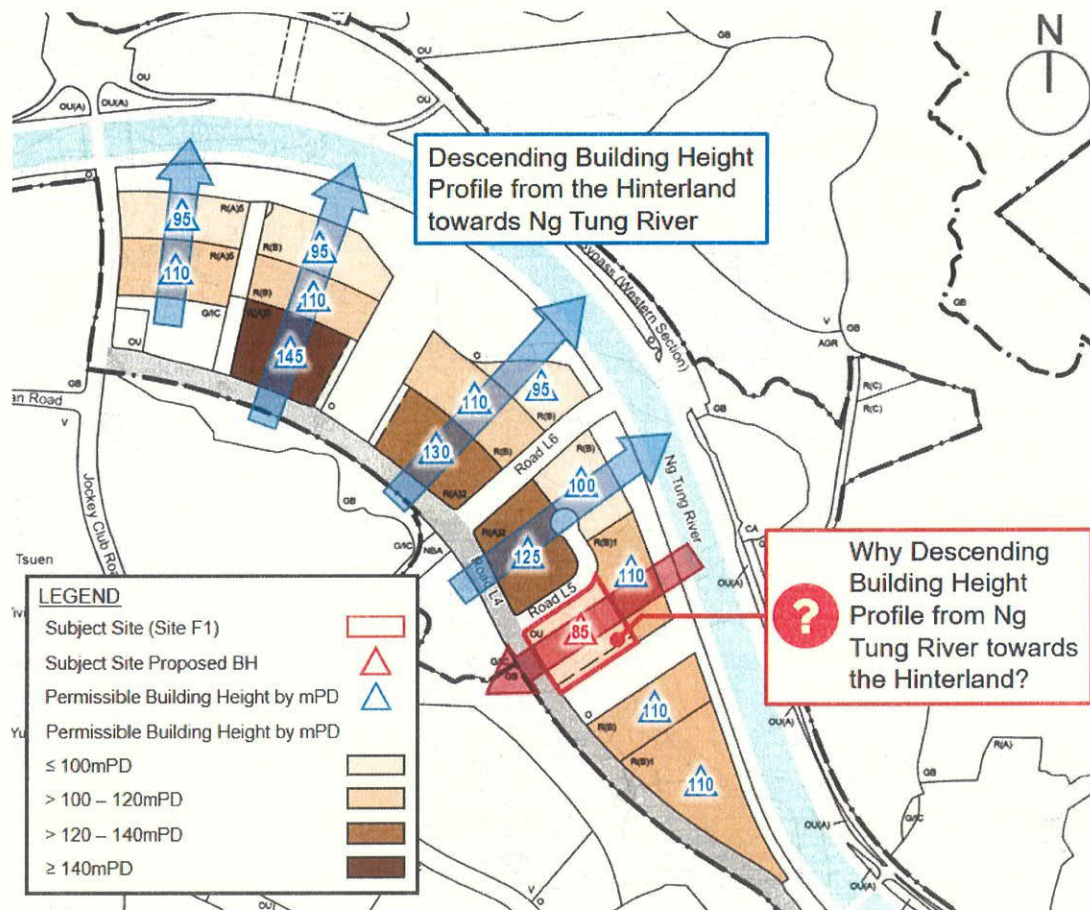
With specific reference to the Subject Site (i.e. Site F1), the proposed BH of 85mPD for the Subject Site under the captioned application does not appear to be aligned with the planned BHs of the surrounding developments sites, particularly given that the permissible BHs of nearby sites have been increased to 100mPD, 110mPD and 125mPD respectively under the latest OZP amendment (for the pilot area of large-scale land disposal in FLN NDA) and the previous planning approvals. The proposed maximum BH of only 85mPD for the Subject Site is substantially lower than that permitted for its surrounding sites and fails to materialize the stepped BH profile concept (i.e. descending BH profile from the hinterland towards Ng Tung River) as intended under the current FLN OZP. In particular, some of the adjoining development sites located near the riverside promenade have a higher maximum BH than that permissible for the Subject Site, notwithstanding that the Subject Site is located further inland. Such BH arrangement does not appear to be logical or consistent with intended stepped BH profile, in which BH of the development sites at the hinterland should be generally higher, and with BH gradually decreasing towards Ng Tung River.

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Building Height Profile of Fanling North New Development Area

The proposed BH of 85mPD for the Subject Site would therefore not only limit the design flexibility of the future development but also result in an inconsistent building height profile in relation to the surrounding development sites. It is considered that a more appropriate BH should be permitted at the Subject Site, having regard to its hinterland location, the BH of surrounding development sites, the overall stepped BH profile under the FLN OZP.

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Conclusion

For the reasons as set out above, we respectfully invite the Board and CEDD to further review the proposed BH for the Subject Site and the overall BH framework under the captioned planning application.

Moreover, upon our further review of the permitted BHs for the Subject Site and the proposed BHs as per CEDD's scenarios in the FI submission, we opine that the proposed BHs for the Subject Site should be revised as follows:-

Scenario 1 (with MiC only): Under JPN 8, for adoption of MiC, 4% increase of total building height is allowed. As such the revised building height should be **no less than 83.2mPD** (based on +4% of the existing 80mPD BHR under OZP).

Scenario 2 (with aboveground carpark only): under the approved GBP submission for the Subject Site, the storey height of the basement carpark is about 7m. As such, if aboveground carpark is adopted, the BH should be **no less than about 87mPD**.

Scenario 3 (with both MiC and aboveground carpark): incorporating the design elements above, the resultant BH for the future development under this scenario should be **no less than 90.2mPD**.

The proposed BH relaxation under the current application from CEDD should provide genuine and sufficient flexibility for future development sites to adopt MiC method and/or incorporate aboveground carparks, while also allowing future residential developments to respond to the latest market trends through the provision of appropriate F-t-F heights and a better indoor living environment. In particular, the application from CEDD should not result in a set of BH restrictions which is more restrictive than that imposed under the current OZP. Furthermore, the BH relaxation as proposed under the current CEDD's application for the Subject Site should be appropriately increased, having regard to its location & context, the maximum BH permissible for its adjacent sites, and the planned intention of the stepped BH profile (i.e. descending BH profile from the hinterland towards Ng Tung River) for the FLN NDA.

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For the avoidance of doubt, whether or not the captioned planning application from CEDD is approved by the Board, we reserve all rights and entitlements in respect of the Subject Site under the current Lease executed, the extant OZP and all applicable laws and procedures. Nothing that in the captioned application, any approval or refusal thereof, or any associated planning submission should be construed as affecting such rights and entitlements (including the right to pursue development up to the building height permitted under the extant OZP), subject always to obtaining all approvals and complying with all requirements applicable to the development proposal concerned.

Yours faithfully,
for and on behalf of
KEEP YORK LIMITED

A handwritten signature in dark ink, appearing to read 'Grant Yuen'.

Grant Yuen
Senior Project Manager

GY/ph

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tpbpd/PLAND

寄件者: [REDACTED]
寄件日期: 2026年09月18日星期五 0:40
收件者: tpbpd/PLAND
主旨: Re: A/KTN/111 Fan Ling North and Kwu Tong NDAs CEDD
類別: Internet Email

Dear TPB Members,

Note that the response to public comments was selective. No reference to the impact of higher and more bulky podiums and their appearance.

*"Slight visual impact is anticipated, the implementation of mitigation measures ((e.g. soft landscaping including screen planting, green roof, vertical greening or compensatory planting, etc) will be adopted to minimise the preserved visual change. Furthermore, only **minimal** air ventilation impacts are anticipated"*

Define SLIGHT and MINIMAL, like MINOR in minor relaxation??

The green planting is green wash. Any member who takes Lion Rock Tunnel can note that none of the mitigation and greening measures promised for Wheelock's The Monet have been implemented and this is a supposedly luxury development. It is a big lump of naked concrete and glass with not a single green element provided. These towers will be for regular units so even less prospect of any relief.

Members should be lobby for the introduction of measures to preserve landmark views and ridgelines in NT before they are all wiped out.

Mary Mulvihill

From: [REDACTED]
To: tpbpd <tpbpd@pland.gov.hk>
Date: Tuesday, 7 July 2026 11:23 PM HKT
Subject: A/KTN/111 Fan Ling North and Kwu Tong NDAs CEDD

A/KTN/111 CEDD

Planning Areas 10NW (including FSSTL No. 307), 13E, 14W, 14S (FSSTL No. 297), 16NW, 16NE, 16SW and 16SE of Fanling North New Development Area; Planning Areas 20E, 25E, 14, 22W, 22E, 26W, 26E, 15N, 15C, 15S, 23N, 23C and 23S of Kwu Tung North New Development Area

Site area: About 331,632sq.m (Includes Government Land of about 308,056sq.m)

Fanling North Portion: About 102,667sq.m (Includes Government Land of about 79,091sq.m)

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Kwu Tung North Portion About 228,965sq.m (Includes Government Land of about 228,965 sq.m

Zoning:

FLN OPX: "Res (Group A) 1", "Res (Group A) 3", "Res (Group B)" and "Other Specified Uses" annotated "Commercial/Residential Development with PTI

KTN OZP: "Res (Group A) 1", "Res (Group B)", "Green Belt" and area shown as 'Road'

Proposed Relaxation MR and BHR Private Housing Developments and PTI / 20 Towers – 22,380 Units / Shop and Services and Eating Place. PR 7.2 / 155 – 135mPD.

Dear TPB Members,

So a 20% increase in PR and up to almost 20mts in height.

"Being situated adjacent to Ng Tung River with hilly terrain to the north, FLN NDA is planned to be developed as a 'Riverside Community' capitalising on the riverside setting, beautiful scenery and hilly backdrop."

Really, any view of the hilly backdrop that was retained under the approved plan will be wiped out by the profusion of even taller ugly monotonous towers.

The consultants must be laughing all the way to the bank as they know that all these CEDD developments will be incrementally increased in PR and BH that require hundreds of pages of updated assessments in order to demonstrate that the outcome will only be more slightly adverse.

*"The Indicative Layouts present various design features to mitigate the impact arising from the increase in BHs. For instance, **sufficient building separations will be maintained** to enhance airflow, improve street-level environmental quality, and mitigate urban heat island effect. The building separations would also enhance visual permeability and reduce the perceivable building bulk, preserving a more open and visually porous urban environment. The NBAs stipulated at the Application Sites are respected to retain their strategic functions in facilitating prevailing winds penetrating through the Application Sites and reaching the downstream areas. Furthermore, for Application Sites that were assumed with podium-free development, the proposed podium carparks are also broken down with adequate building separation as far as practicable to minimise the impact on air ventilation performance at the pedestrian level"*

But these building separations were already indicated in the previous plan. The site size remains the same so this is playing with words. That the visibility will be enhanced is risible as putting the parking above ground will create higher and more bulky podiums and result in a more claustrophobic wall effect. More over parking lots are lit 24/7 creating light pollution and their exterior walls are ugly.

The increases are solely intended to reduce construction costs at the expense of providing a pleasant environment at street level and to increase the number of units and revenue. Note that no data is provided with regard to changes in the number of units or their dimensions.

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We are not fooled but of course the application will be streamlined and rubber stamped in line with similar previous applications.

Mary Mulvihill