

2 October 2026

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

By Fax and By Email

Dear Sir

Section 16 Planning Application for Proposed Mixed-Use Development (Proposed Flat with Permitted Commercial Uses) with Minor Relaxation of Building Height Restriction at Lot 4354 in D.D. 124, Kiu Tau Wai, Yuen Long (Application No. A/HSK/617)

Reference is made to the captioned application submitted to the Town Planning Board (the Board) on 8 June 2026, and the comments received from the Tuen Mun and Yuen Long West District Planning Office (DPO/TMYLW) in October 2026.

As per comments from DPO/TMYLW, the Applicant would like to provide the following clarifications for the Board's consideration:

1. Justifications for Proposed Minor Relaxation in Building Height (BH) Restrictions

(i) Evolving Planning Context Supporting a Higher BH within Surrounding High-Rise Planned Developments

As detailed in the Planning Statement, the existing BH restriction of 135mPD for the Application Site merely reflects the commercial schemes previously approved under Application Nos. A/YL-PS/445 and A/YL-PS/520 back in 2015 and 2017. Nearly a decade has passed since those approvals, and the planning context has changed significantly, with the surrounding sites having been rezoned to "Other Specified Uses (Mixed Use)" ("OU(MU)") and "Commercial" ("C") subject to a BH restriction of 160mPD. The Proposed Development, with a maximum BH of 160mPD, would therefore be fully compatible with the surrounding planned developments in the Hung Shui Kiu/Ha Tsuen New Development Area.

(ii) Change in Permissible Site Coverage for a Mixed-Use Scheme under B(P)R Necessitating Minor Increase in BH

The previously Approved Scheme was a pure commercial development with a higher site coverage permissible under the Building (Planning) Regulations (B(P)R), hence it comprised a relatively more extensive podium with its lowest floors occupying almost the entire site. In contrast, the Proposed Development under the current application is a mixed-use development, with its domestic portion subject to a lower site coverage permissible under the B(P)R. With the total plot ratio remains unchanged as a maximum of 8.0, to ensure compliance with the B(P)R for the mixed-use development, the Applicant has redesigned the scheme to redistribute the GFA vertically with more no. of storeys, resulting in a minor increase in BH as compared to the Approved Scheme.

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(iii) Aboveground Carpark Design Contributing to Minor Increase in BH

As compared with the Approved Scheme, the Proposed Scheme has incorporated an aboveground carpark design in response to the latest Government Policy to allow full GFA exemption for no more than two storeys of aboveground carparks, while removing the mandatory requirement of constructing underground carparks as a condition of exemption. The inclusion of two levels of aboveground carpark in the Proposed Scheme has therefore contributed to the minor increase in BH.

(iv) Residential Floor-to-floor Height (FtFH) Not Excessive

Under the Proposed Scheme, the residential tower has a proposed typical FtFH of 3.15m only. In adopting this FtFH, the Applicant has already kept the floor height to a very moderate level. It is important to note that the proposed typical FtFH of 3.15m is already significantly lower than that of other recent private housing developments, including Belgravia Place (2025), Nexus Grand (2025), HAVA (2025), and Mount Broadcast (2026), which all feature a typical FtFH of up to 3.5m.

(v) Various Design Merits Offered

According to the Notes of the OZP, based on the individual merits of a development or redevelopment proposal, minor relaxation of BH restrictions may be considered by the Board on application under S16 of the Ordinance. In this connection, various planning and design merits have been incorporated into the Proposed Scheme. These include:

- A stepped podium design descending from +32.5mPD to +23.5mPD toward the northeast corner facing TSW MTR Station to softening the building bulk and creating a more inviting pedestrian experience;
- Proposed footbridge connecting to Exit B of TSW Station, with potential connection to the SGMST Station and other "OU(MU)" and "C" sites to the south through the planned elevated pedestrian link, forming an elevated pedestrian network among various sites within the District Commercial Node and major transport hubs;
- Proposed footbridge across the existing nullah to improve at-grade accessibility to the Site, together with a possible nullah deck for landscape area to enhance the streetscape, promote pedestrian comfort, and serve as a welcoming plaza for the development;
- Potential footbridge across Ping Ha Road (subject to further study and detailed design), providing a safer, more efficient alternative to existing street-level crossings;
- Reserved opening along the western boundary to allow for a possible future connection to the adjoining "C(2)" site;

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- Proposed additional bus lay-bys in the westbound direction along Ping Ha Road to strengthen external connections to/from the District Commercial Node;
- Proposed 24-hour pedestrian link within the Commercial/Retail Podium to connect all the above elements, forming a seamless and comprehensive pedestrian network that enables round-the-clock circulation in the neighbourhood.

The proposed minor relaxation in BH restriction from 135mPD to 160mPD under the current application is justified based on the above planning and technical considerations.

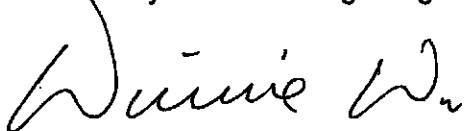
2. Minor Textual Updates to the Planning Statement

Opportunity has also been taken to make minor textual updates on the Planning Statement. The replacement pages of the Planning Statement are provided in **Attachment 1** for reference.

Please note that the current submission is made mainly to provide minor clarifications and responses to comments from DPO/TMYLW. There are no changes to the proposed layout and development parameters with no revised calculations or reassessments involved. Accordingly, it should be exempted from the publication and recounting requirements. We sincerely request that the captioned application be considered by the Board as originally scheduled on 9 October 2026.

Thank you for your kind attention. Should there be any queries, please do not hesitate to contact the undersigned at 2957 9602 or our Mr Arnold Koon at 2957 9667 / Mr Jason Chan at 2957 9612.

Yours faithfully
for Llewelyn-Davies Hong Kong Ltd



Winnie Wu
Planning Director

WW/AK/jc
Encl

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cc (w/ encl)
DPO/TMYLW

Attn: Carman Cheung / Charlotte Lam / Karry Lau (by email)

Attachment 1 –

**Replacement Pages of the
Planning Statement**

available at least 2,000,000m² of commercial floorspace for local, Mainland and international enterprises to provide high-end professional services, including over 1,000,000m² within the HSK Town Centre. In parallel, a consultancy study is currently underway for the development at Lau Fau Shan, Tsim Bei Tsui and Pak Nai Areas (collectively referred to as the “LFS Area”). As outlined in the development proposal published in 2024, the LFS Area will serve as an extension of the HSK/HT NDA and be positioned as a Digital Technology Hub, with 28% of its land use allocated to economic activities creating about 50,000 employment opportunities. Together with other existing and planned development areas, including the Tin Shui Wai New Town, Yuen Long New Town and the Yuen Long South New Development Area, there will be ample supply of commercial floorspace to support the High-end Professional Services and Logistics Hub, as well as the broader NM. This provides scope for review of the distribution of commercial floorspace within the area, ensuring sustainable growth and land use efficiency.

Latest Government Policy to Increase Flexibility for Accommodating Residential Uses in Commercial Sites

2.2.3 To facilitate timely implementation of the developments in NM and taking into account broader market forces and other relevant factors, the Government has announced various policy directives in recent years to increase flexibility in accommodating residential uses at commercial sites, particularly within the HSK/HT NDA:

- In August 2024, the Development Bureau announced that having taken into account industry feedback supporting the inclusion of additional residential uses in the future HSK Town Centre, the Bureau was of the view that some non-domestic GFA at commercial and mixed-use sites near the future HSK Station may be reallocated for residential use;
- Later in February 2025, the Financial Secretary announced in the 2025–26 Budget that in view of the high vacancy rates of offices in recent years and the relatively ample supply expected in the next few years, the Government would consider allowing greater flexibility in land use and consider rezoning some commercial sites into residential use;

- In March 2025, the Secretary for Development announced that the Government would review measures to increase flexibility for commercial sites for incorporation of more residential uses. In particular, for commercial sites within the HSK/HT NDA, the Government would explore further relaxing the reallocation of non-domestic GFA for residential use.

2.2.4 The above-mentioned government directives reflect a policy shift towards greater flexibility in allowing residential uses at commercial sites, particularly within the HSK/HT NDA. Against this backdrop and taking into consideration the ample supply of commercial floorspace in the HSK/HT NDA, it is both timely and appropriate to reassess the development potential and strategic positioning of the Application Site.

Similar Approved Cases for Increasing Residential Proportion in Mixed-Use Developments

2.2.5 In fact, a number of applications proposing to increase the residential proportion of mixed-use developments within the HSK/HT NDA have been approved by the Board in recent years (**Figure 2.4** refers):

- Application No. A/HSK/474 for proposed increase in domestic PR from 4.5 to 5.625 (with the overall PR of 7 remaining unchanged) at an “OU(MU)” site to the southeast of the Application Site was approved by the Board on 26.1.2024. The application was approved on the grounds that it could provide additional residential units to meet the housing demand arising from the growing economic activities in NM, and that the slight reduction of non-domestic GFA in the development would not have significant impact on the overall function of the District Commercial Node;
- Similarly, Application No. A/HSK/573 for proposed increase in domestic PR from 4.5 to 5 (with the overall PR of 7 remaining unchanged) at an “OU(MU)” site near the future HSK Station was approved by the Board on 15.8.2025. The application was supported by the Secretary for Development as it tallied with DevB’s announcement in August 2024 to allow for flexibility on the reallocation of non-domestic GFA for residential uses (as mentioned in Para. 2.2.5 above). The Application was approved on the grounds that the proposed conversion could provide additional residential units and would not affect the positioning of the HSK/HT NDA as High-end Professional Services and Logistics Hub.

5 PLANNING JUSTIFICATIONS AND MERITS

5.1 In Line with Latest Government Policy to Allow Greater Flexibility for Residential Uses within Commercial Zones in the HSK/HT NDA

5.1.1 Since August 2024, the Government has introduced a series of policy directives to increase flexibility in accommodating residential uses within commercial sites, particularly in the HSK/HT NDA. **In particular, the Government indicated that some non-domestic GFA on commercial sites could be reallocated for residential purposes.** This policy is seen as a response to industry feedback as well as a reflection of the broader market changes, and serves as a facilitative measure to enable the timely implementation of developments in NM. In this context, the Proposed Development with mixed commercial/residential uses at the subject “C(2)” site is fully in line with the Government’s latest policy direction.

5.2 Unique Site History Justifying Appropriateness of both Residential and Commercial Uses

5.2.1 As discussed in Section 2.4 above, **the Application Site has a unique site history, with the Board having approved both a residential scheme (Application No. A/YL-PS/407, approved on 12.9.2014) and commercial schemes (Application Nos. A/YL-PS/445 and A/YL-PS/520, approved on 27.3.2015 and 17.3.2017 respectively).** While the current OZP zoning and restrictions, i.e. “C(2)” zone with a maximum PR of 8 and BH of 135mPD, were formulated largely based on the development parameters of the two approved commercial schemes, the approval of the residential scheme demonstrates that both residential and commercial developments at the Application Site were considered compatible in land use terms and feasible in technical terms. Accordingly, the proposed mixed-use development, with its balanced mix of commercial and residential components, is considered appropriate.