

APPLICATION FOR PERMISSION
UNDER SECTION 16 OF THE TOWN PLANNING ORDINANCE

APPLICATION NO. A/TWW/130

- Applicant** : Leverson Limited represented by Llewelyn-Davies Hong Kong Limited
- Site** : Tsuen Wan Inland Lot (TWIL) 5 and Lot 429 in D.D. 399, Ting Kau, Tsuen Wan
- Site Area** : About 6,431m²
- Lease** : TWIL 5
- (a) held under Government lease dated 7.1.1926 for virtually unrestricted purpose and subject to a “rate and range” clause
 - (b) pursuant to a No Objection Letter dated 15.12.2006, five types of offensive trades for Sugar-baker, Oilman, Butcher, Victualler and Tavern-Keeper are permitted
- Lot 429 in D.D. 399
- (a) held under New Grant No. 3650 dated 14.11.1958 as varied or modified by a Modification Letter dated 20.11.2000 for the purpose of garden, open carpark and loading and unloading area ancillary to the use of TWIL 5 and subject to Government Notice (G.N.) No. 364 of 1934 as amended by G.N. No. 50 of 1940 and the Conditions governing TWIL 5, to the Special Condition that no building be allowed on the lot and to a right-of-way in favour of the inhabitants of the headland
 - (b) no right of ingress or egress to or from the lot through Government land for the passage of motor vehicles and the lot owner shall make his own arrangements for acquiring such right of ingress or egress
- Plan** : Approved Tsuen Wan West Outline Zoning Plan (OZP) No. S/TWW/21
- Zoning** : “Residential (Group B) 2” (“R(B)2”)
- (a) maximum gross floor area (GFA) of 29,400m² or the GFA of the existing building, whichever is the greater
 - (b) no part of the structures shall exceed the maximum building height (BH) of 77mPD or the BH of the existing building, whichever is the greater
 - (c) GFA of not less than 760m² for Government, institution or community (GIC) facilities¹
 - (d) for any new development or redevelopment of an existing building, a layout plan (LP) shall be submitted for the approval of the Town

¹ According to the Notes of the “R(B)2” zone under the OZP, in determining the maximum GFA, any floor space that is constructed or intended for use solely as GIC facilities, as required by the Government, may be disregarded.

Planning Board (the Board); and should include the following information:

- (i) the proposed land use(s), and the form, disposition and heights of all buildings (including structures) to be erected on the site;
- (ii) the proposed GFA of various uses and facilities;
- (iii) an environmental assessment (EA) report to examine any possible environmental problems in respect of air quality and traffic noise that may be caused to or by the proposed development and the proposed mitigation measures to tackle them; and
- (iv) such other information as may be required by the Board.

Application : Submission of LP for Permitted ‘Flat’ and ‘Social Welfare Facility’ Uses

1. The Proposal

- 1.1 The applicant seeks planning permission for a LP for redevelopment of an existing building for a proposed private residential development cum social welfare facility within the application site (the Site), which falls within an area zoned “R(B)2” on the approved Tsuen Wan West OZP No. S/TWW/21 (**Plan A-1**). According to the Notes of the “R(B)2” zone under the OZP, ‘Flat’ and ‘Social Welfare Facility’ are Column 1 uses, which are always permitted; and for redevelopment of the existing building therein, a LP should be submitted for the approval of the Board.
- 1.2 The Site is currently occupied by a hotel, namely Royal View Hotel. A previous section 12A application No. Y/TWW/7 for rezoning the Site from “Comprehensive Development Area (1)” (“CDA(1)”), “Green Belt” (“GB”) and an area shown as ‘Road’ to “R(B)2” for a proposed private residential development with provision of social welfare facility through wholesale conversion of the existing hotel development (the S.12A Scheme) (details in paragraph 4 below), was agreed by the Metro Planning Committee (the Committee) of the Board on 2.6.2022. Subsequently, in considering the proposed amendments to the Tsuen Wan West OZP on 25.11.2022, the Committee also agreed that should the existing building be redeveloped, a LP should be submitted to demonstrate that the potential air quality and road traffic noise impacts and the respective mitigation measures could be identified and implemented through section 16 planning application mechanism to ensure acceptable living environment for the future residents.
- 1.3 According the applicant, due to the limited design flexibility of the building design of the existing hotel, there is little room for changing the configuration of the layout to meet the current market needs and further refine the design of the social welfare facility (i.e. a 60-place Day Care Centre for the Elderly (DE) as proposed under the notional S.12A Scheme) and open space to address the Committee’s concerns regarding the flat size and layout, the DE design and

provision of open space for the DE users². In this connection, redevelopment of the existing hotel is proposed by the applicant.

- 1.4 Under the current scheme (the S.16 Scheme), the existing building will be redeveloped into two residential towers, namely Tower 1 and Tower 2, comprising not more than 674 flats. The resultant GFA of not more than 29,400m² and BH of not more than 77mPD (including rooftop structures) conform to the GFA and BH restrictions under the Notes of the OZP. A GIC facility, i.e. a 60-place DE of not less than 760m² to be located on LG/F (i.e. street level) of Tower 1 and handed over to the Social Welfare Department (SWD) as a Government Accommodation, is proposed subject to determination by SWD at the implementation stage to meet the OZP requirement. The LP, floor plans, section plans, Landscape Master Plan (LMP), landscape plans, open space demarcation plan and photomontages of the S.16 Scheme are shown in **Drawings A-1 to A-28**. The major development parameters are set out as follows:

Major Development Parameters	
Site Area - Application Site Area ⁽¹⁾ - Development Site Area ⁽²⁾	About 6,431m ² About 6,066m ²
GFA - Domestic - Non-domestic ⁽³⁾	Not more than 29,400m ² Not less than 760m ² for the 60-place DE ⁽⁴⁾
Maximum BH (including lift machine rooms on the roofs)	Not more than 77mPD
No. of Blocks	2
No. of Storeys - Tower 1 - Tower 2	15 (excluding 2 basement levels) 14 (excluding 1 basement level)
No. of Units	Not more than 674
Anticipated Population ⁽⁵⁾	About 1,820
No. of Car Parking Spaces <i>Residential Portion</i> ⁽⁶⁾ - Private Car - Motorcycle <i>DE Portion</i> - Private Light Bus	122 (including 10 for visitors) 7 3
No. of loading/unloading (L/UL) spaces - Residential Portion - DE Portion	2 1 (private light bus/ambulance)
Private Open Space ⁽⁷⁾	Not less than 1,820m ²

² The relevant minutes can be viewed at https://www.tpb.gov.hk/en/meetings/MPC/Minutes/m696mpc_e.pdf (Agenda Item 3). The paper can also be viewed at https://www.ozp.tpb.gov.hk/api/Doc/Papers?fileName=MPC%2fMPC-20220602%2fTWK%2fY_TWW_7/Y_TW_W_7+Main+Paper.pdf&dType=in for reference.

Major Development Parameters	
Tree Felling/Preservation Proposal	
- No. of existing trees	66
- Trees to be felled	66 (including 5 dead trees)
- New trees to be planted	Not less than 72
Anticipated Completion Year	2028

Notes:

- (1) The application site area is based on the lot boundary of TWTL 5 and Lot 429 in D.D. 399 (**Plan A-2**).
- (2) The development site area excludes the portion of an access road within TWTL 5 of about 365m² (**Plan A-2**).
- (3) The non-domestic GFA excludes the residents' clubhouse which is based on the maximum GFA concession for clubhouse according to PNAP APP-104.
- (4) The type of GIC facility is subject to the determination by SWD at the implementation stage. According to the Notes of the OZP, any floor space that is constructed or intended for use solely as GIC facilities, as required by the Government, may be disregarded. The net operational floor area will be subject to agreement with SWD.
- (5) The anticipated population is derived by assuming 2.7 persons per flat with reference to the average household size of Tsuen Wan District in 2022 under General House Survey by the Census and Statistics Department.
- (6) The number of car parking spaces for the residential portion which is less than the upper end of the Hong Kong Planning Standards and Guidelines (HKPSG)'s requirement is proposed after taking into consideration the proximity to public transport services, availability of public car parking spaces, traffic conditions and conditions of illegal parking in the vicinity of the Site.
- (7) Among the 1,820m² private open space, about 200m² of private open space will be open for shared use by the DE users.

1.5 The main uses by floor of the proposed development are summarised as follows (**Drawings A-2 to A-12**):

Floor	Main Uses	
	Tower 1	Tower 2
B2/F	Carpark	-
B1/F	Carpark and E&M	
LG/F	DE, carpark, L/UL space, private open space (for residents and DE users) and E&M	Carpark and E&M
G/F	Flats, landscape area and private garden	L/UL spaces, clubhouse, landscape area and E&M
Upper part of clubhouse	-	Clubhouse
1/F	Flats	Flats, clubhouse, landscape area and E&M
2/F	Flats	Flats, private flat roof and landscape area
3/F	Flats	Flats, private flat roof and landscape area

Floor	Main Uses	
	Tower 1	Tower 2
4/F – 11/F	Flats	Flats
12/F	Flats	Flats and private flat roof
13/F	Flats and private flat roof	-
R/F	Roof garden and private flat roof	Roof garden and private flat roof

Flat Layout and Size

- 1.6 According to the applicant, in responding to the change in market needs and the concerns of the Committee on the S.12A Scheme about the relatively small flat size, long common corridors and potential interface issues between the residential units and clubhouse on the same floors, the S.16 Scheme will allow flexibility to provide flats in various layouts and sizes to cater for the diverse needs of the future residents and provide a better living environment.

Design of the DE

- 1.7 Under the S.12A Scheme, the DE could only be located on two separate floors (i.e. 2/F and 5/F) with entrance far away from the vehicular access of the Site (**Drawing A-29**). The DE users would have to use the lift on 2/F to access the facilities on 5/F. Apart from the location, the internal layout of the DE was also constrained by the structural walls of the existing building (**Drawing A-30**) and no open space would be provided for the DE users (**Drawing A-31**).
- 1.8 With a view to enhancing accessibility of the DE and convenience for the future users, the DE will be located at the street level on one floor with direct access from the Site entrance under the S.16 Scheme (**Drawings A-4 and A-29**). Moreover, there will be dedicated car parking and L/UL spaces outside the DE for exclusive pick-up/drop-off, which will be separated from the residential portion of the proposed development. The adoption of column structure under the S.16 Scheme will allow linear corridor with activity rooms on both sides in the DE (**Drawing A-30**), so as to enhance efficiency of space usage and provide easy navigation for the DE users.
- 1.9 According to the applicant, an open space of about 200m² adjacent to the DE will be provided for shared use by the DE users (**Drawings A-4, A-17 and A-24**), which could not be provided under the S.12A Scheme. Covered landscape area with canopy of about 2m in width will be provided to enhance comfort of the DE users (**Drawing A-32**). The open space will be used for leisure activities with outdoor seating areas, multi-purpose deck and outdoor lounge area (**Drawing A-33**).

Proposed Vehicular Access

- 1.10 The vehicular access of the proposed development will be served by a two-way access road branching off from Castle Peak Road – Ting Kau (**Drawing A-1**). To facilitate smooth circulation at the proposed development, there will be three separate ingresses/egresses located on the western side of the Site leading to

the pick-up/drop-off of the DE (**Drawing A-4**), Tower 1 and the basement carpark (**Drawing A-4**), and Tower 2 (**Drawing A-5**) respectively under the S.16 Scheme as compared with one shared pick-up/drop-off location for the residential portion and the DE under the S.12A Scheme.

Provision of Open Space

- 1.11 The S.16 Scheme includes not less than 1,820m² private open space (**Drawing A-24**), of which about 200m² will be open for shared use by the DE users. Private open space will be provided at different levels, including open space accessible by the DE users on LG/F of Tower 1 (**Drawings A-4 and A-17**), landscape area on G/F (**Drawings A-5 and A-18**) and roof gardens on the rooftops of Towers 1 and 2 (**Drawings A-12, A-20 and A-34**).

Landscape, Tree Treatment and Urban Design

- 1.12 As revealed by the applicant's tree survey and preservation proposal, 66 existing trees are found within the Site, including one mature tree and five dead trees. All of the trees, which are mostly of common species and in fair to poor health condition, poor structural condition and form with low amenity value, are proposed to be felled due to their conditions, conflict with the proposed layout and unsuitability of transplanting. According to the LMP (**Drawing A-16**), not less than 72 new trees will be planted within the Site for compensation, resulting in a net increase of six new trees.
- 1.13 An overall site coverage of greenery of not less than 20% will be provided in accordance with the Sustainable Building Design Guidelines (SBDG) requirements (**Drawings A-17 to A-20**).
- 1.14 To facilitate air flow and to achieve design enhancement, a building separation of not less than 15m between Towers 1 and 2 will be provided to break down the building mass and allow visual permeability (**Drawing A-1**). As illustrated in the photomontages (**Drawings A-25 to A-28**), the provision of building separation will allow visual permeability when viewing from the key public viewpoints.

Other Design Aspects

- 1.15 According to the applicant, a setback distance of not less than 3.8m between the proposed development and Ting Kau Bridge will be maintained for the bridge maintenance works (**Drawing A-15**), which is the same as that between the existing hotel block and Ting Kau Bridge.

Environmental Aspects

- 1.16 A quantitative Air Quality Impact Assessment (AQIA) has been conducted to evaluate the acceptability of the proposed development in terms of air quality. The air quality impacts during the construction phase and the operation phase have been assessed. The assessment results show that the predicted air quality pollutant concentration of the proposed development will comply with the relevant air quality objectives and be acceptable on air quality aspect.

- 1.17 Also, a Noise Impact Assessment (NIA) has been conducted to evaluate the road traffic noise. With provision of mitigation measures such as acoustic window (baffle type), acoustic balcony (baffle type) and fixed glazing with/without maintenance window (**Drawing A-35**), there will be no exceedance in traffic noise. The proposed development will be acceptable in respect of traffic noise.
- 1.18 In view of the waste generated during the construction phase of the proposed redevelopment, the applicant has formulated a waste management and disposal strategy. Prior to considering the disposal options for various types of waste, opportunities to reduce waste generation, on-site or off-site reuse and recycling have been evaluated in the EA. With the waste management measures including reusing excavated material comprising fill material on-site as backfilling material, recycling inert construction waste and recycling electrical appliances or furniture before demolition, no significant impact is anticipated due to the waste generated by redevelopment of the existing building.
- 1.19 In support of the application, the applicant has submitted the following documents:
- (a) Application form and letter received on 15.8.2024 (Appendix I)
 - (b) Planning Statement with technical assessments received on 15.8.2024 (Appendix Ia)
 - (c) Further Information (FI) received on 22.10.2024[@] (Appendix Ib)
- Remarks:*
@ not exempted from publication and recounting requirements
- 1.20 On 4.10.2024, the Committee agreed to defer making a decision on the application for two months at the request of the applicant.

2. Justifications from the Applicant

The justifications put forth by the applicant in support of the application are detailed in **Appendices I to Ib**. They are summarised as follows:

- 2.1 The proposed development is in line with the planning intention for “R(B)2” zone under the OZP, which is intended primarily for medium-density residential developments. The proposed ‘Flat’ and ‘Social Welfare Facility’ uses are always permitted under the OZP. The proposed development parameters also comply with the GFA and BH restrictions for the “R(B)2” zone. Moreover, a 60-place DE of not less than 760m² will be provided to meet the OZP requirement.
- 2.2 The layout and provision of open space of the DE will be significantly enhanced under the S.16 Scheme as compared to the S.12A Scheme. Under the S.16 Scheme, the DE will be located on one floor at the street level near the Site entrance with exclusive vehicular pick-up/drop-off directly outside the DE (**Drawings A-4 and A-29**), which will be more convenient for the DE users. The regular shape of floor plate with column structure under the S.16 Scheme will

also provide more flexibility and efficiency in terms of layout design and space usage (**Drawing A-30**). Moreover, an open space of not less than 200m² adjacent to the DE will be provided for shared use by the DE users (**Drawings A-4, A-17 and A-24**).

- 2.3 There are also other design merits that can only be achieved under the S.16 Scheme through redevelopment. The building disposition and separation (**Drawing A-1**), which will allow visual permeability and facilitate air flow by breaking down the building mass, can only be provided under the S.16 Scheme. The proposed building separation and building setbacks will comply with the SBDG requirements. Moreover, the variations in flat layout and size can only be realised through redevelopment. The rooftops of the two towers under the S.16 Scheme will also contain accessible roof gardens with landscaping and seating for enjoyment of the future residents instead of accommodating E&M facilities under the S.12A Scheme (**Drawings A-12, A-20 and A-34**).
- 2.4 When considering the S.12A Scheme, the Committee had comments on the layout of the DE, provision of open space for the DE users, interface issues between the residential units and clubhouse on the same floors and interior design of the existing building, such as long common corridors and small-sized flats, which are due to the limitations of wholesale conversion. The S.16 Scheme will fully address the Committee's comments by enhancing the design of the DE, separating floors of clubhouse and residential units with separate accesses (**Drawing A-5**) and providing flats in various sizes with standard common corridor.
- 2.5 In responding to the policy direction to increase housing supply, under the S.16 Scheme through redevelopment, there will be a total of not more than 674 units with greater flexibility in the layout design to suit the needs of the future residents.
- 2.6 As demonstrated by various technical assessments, the S.16 Scheme will not generate adverse impacts on traffic, environmental, drainage, sewerage and geotechnical aspects. Visual and air ventilation aspects have also been taken into considerations for the S.16 Scheme.

3. Compliance with the “Owner’s Consent/Notification” Requirements

The applicant is the sole “current land owner” of the Site. Detailed information would be deposited at the meeting for Members’ inspection.

4. Background

On 2.6.2022, the section 12A application No. Y/TWW/7 for rezoning the Site from “CDA(1)”, “GB” and an area shown as ‘Road’ to “R(B)2” for the proposed private residential development with provision of social welfare facility through wholesale conversion of the existing hotel development was agreed by the Committee of the Board on the grounds that the proposed in-situ conversion was a quick way to increase housing supply; in-situ conversion was an environmentally friendly option compared to redevelopment; hotel use at the location might not be viable in the longer terms taking

into account the planned/existing hotels in the nearby more accessible districts; the proposed small-sized flats would be able to meet some market demand; and the DE would address the shortfall of elderly services in Tsuen Wan area. Subsequently, in considering the proposed amendments to the Tsuen Wan West OZP on 25.11.2022, taking into consideration the Environmental Protection Department's advice that should the existing building be redeveloped in the future, the potential air quality and road traffic noise impacts and the respective mitigation measures should be identified and implemented through section 16 planning application mechanism so as to ensure acceptable living environment for the future residents, the Committee also agreed to incorporate the requirement for submission of a LP to address the environmental concerns. The draft Tsuen Wan West OZP No. S/TWW/20 was gazetted on 16.12.2022 under section 5 of the Town Planning Ordinance and was subsequently approved by the Chief Executive in Council on 14.11.2023.

5. Previous Applications (Plan A-1)

- 5.1 The Site is the subject of nine previous section 16 applications, which were all submitted for approval of Master Layout Plan under the previous “CDA(1)” zone for hotel development in accordance with the previously stipulated development restrictions. They were all approved with conditions by the Committee from 1998 to 2005.
- 5.2 Subsequently, the section 12A application No. Y/TWW/7 for rezoning the Site from “CDA(1)”, “GB” and an area shown as ‘Road’ to “R(B)2” was agreed by the Committee on 2.6.2022 as set out in background in paragraph 4 above.

6. Similar Application

There is no similar application within the OZP.

7. The Site and Its Surrounding Areas

- 7.1 The Site is (**Plans A-1 to A-3**):
- (a) currently occupied by Royal View Hotel completed in 2006;
 - (b) situated at the top of Ting Kau headland to the east of Ting Kau Bridge;
 - (c) sandwiched between Ting Kau Beach to the east and Lido Beach to the west; and
 - (d) accessible from an access road branching off from Castle Peak Road – Ting Kau, which is partly located within the Site.
- 7.2 The surrounding areas have the following characteristics:
- (a) to the east are vegetated slopes (zoned “GB”), low-rise and low-density

villa type developments (zoned “Residential (Group C)” (“R(C)”), Ting Kau Village (zoned “Village Type Development” (“V”)) and Ting Kau Beach (zoned “Open Space”(“O”)) (**Plans A-1 and A-3**);

- (b) to the south are vegetated slopes (zoned “GB”), low-rise and low-density villa type developments (namely Sea Cliff Lodge and Aztec Lodge which are zoned “R(C)1”) and the Ting Kau Sitting-out Area (zoned “O” and with pedestrian access to Lido Beach) (**Plans A-2 and A-3**);
- (c) to the west is Ting Kau Bridge. To the further west is Lido Beach, Casam Beach and Hoi Mei Beach (which are zoned “O”) (**Plan A-1**);
- (d) to the north is Castle Peak Road – Ting Kau and Ting Kau Carpark (**Plan A-2**); and
- (e) there are bus stops and green minibus stands at Castle Peak Road (both Ting Kau and New Ting Kau sections) within 400m walking distance from the Site.

8. Planning Intention

- 8.1 The planning intention of “R(B)2” zone is primarily for medium-density residential developments where commercial uses serving the residential neighbourhood may be permitted on application to the Board.
- 8.2 According to the Explanatory Statement of the OZP, for any new development or redevelopment of an existing building within the “R(B)2” zone, a LP with relevant EA to ensure that the air quality and traffic noise issues could be properly addressed should be submitted for the approval of the Board.

9. Comments from Relevant Government Departments

- 9.1 The following Government departments have been consulted and their views on the application are summarised as follows:

Land Administration

- 9.1.1 Comments of the District Lands Officer/Tsuen Wan and Kwai Tsing, Lands Department (LandsD):
 - (a) the proposed development is considered not contravening the lease conditions governing the Site; and
 - (b) reserves comments on the proposed schematic design which would only be examined in detail during the building plan submission stage. There is no guarantee that the schematic design as presently proposed in the subject section 16 planning application if reflected in future building plan submission(s) will be acceptable under lease.

Traffic

9.1.2 Comments of the Commissioner for Transport (C for T):

as the applicant has provided substantiation to demonstrate the proposed parking provisions which is less than the upper end of the HKPSG's requirement, C for T has no further comment on the Traffic Impact Assessment (TIA) from traffic engineering and operation viewpoints.

9.1.3 Comments of the Chief Highway Engineer/New Territories West, Highways Department (CHE/NTW, HyD):

for the access road indicated on the drawings, please note that only part of the access road (near Castle Peak Road) is maintained by HyD. The applicant may need to conduct necessary assessment and seek comment from the relevant party for the use of the access road.

Environment

9.1.4 Comments of the Director of Environmental Protection (DEP):

- (a) no objection to the application subject to the following conditions:
 - (i) the submission of a revised AQIA to the satisfaction of DEP or of the Board;
 - (ii) the implementation of the noise mitigation measures identified in the NIA to the satisfaction of DEP or of the Board; and
 - (iii) the implementation of the local sewerage upgrading/sewerage connection works identified in the Sewerage Impact Assessment (SIA) to the satisfaction of the Director of Drainage Services or of the Board; and
- (b) other detailed comments are set out at **Appendix II**.

Drainage and Sewerage

9.1.5 Comments of the Chief Engineer/Mainland South, Drainage Services Department (CE/MS, DSD):

- (a) no adverse comment on the Drainage Impact Assessment (DIA). The following approval condition should be imposed if the Board decides to approve the application:

the implementation of the drainage scheme identified in the DIA to the satisfaction of the Director of Drainage Services or of the Board; and
- (b) no comment on the SIA. CE/MS of DSD has no objection to the

incorporation of approval condition as set out in paragraph 9.1.4 (a)(iii) above.

Urban Design, Visual and Landscape Aspects

9.1.6 Comments of the Chief Town Planner/Urban Design and Landscape, Planning Department (CTP/UD&L, PlanD):

Urban Design and Visual

- (a) the Site of about 6,431m² is situated at the top of the headland generally zoned “GB” between Ting Kau Beach to the east and Lido Beach to the west. The Site is bordering Ting Kau Bridge and Castle Peak Road to its west and north respectively. To the east is a cluster of low-density residential developments zoned “R(C)” and “V” with BHs generally ranging from 1 to 3-storey. To the west and north across Ting Kau Bridge and Castle Peak Road are areas generally zoned “GB” scattered with some low-density residential developments zoned “R(C)” with BH generally ranging from 1 to 6-storey. The proposed development parameters would conform to OZP restrictions in terms of GFA and BH. Given the context, the proposed development would unlikely induce significant adverse effects on the visual character of the surrounding townscape;
- (b) as gathered from the submission, the applicant has proposed building separation of not less than 15m between Towers 1 and 2 as a design measure. Landscape treatments in form of tree and shrub planting, planters, roof gardens and feature paving are also proposed. The above design measures may promote visual interest and pedestrian comfort; and
- (c) it is noted that the proposed development will comply with the requirements under SBDG for building separation, building setback and the minimum site coverage of greenery.

Landscape

- (a) no comment on the application from landscape planning perspective;
- (b) with reference to the aerial photo of 2023, the Site is situated in an area of residential urban fringe landscape character predominated by “O”, “GB”, GIC developments and village type developments. The Site is currently occupied by Royal View Hotel;
- (c) according to the tree survey and preservation proposal, there are 66 nos. of existing trees within the Site. All of them are proposed to be felled, including 1 large mature *Bombax ceiba*, T0024 (diameter at breast height: 1000mm). Total 72 nos. of heavy standard size new trees are proposed to be planted within the proposed development;

- (d) according to the landscape plans, open landscape area is proposed on lower ground floor, ground floor, roof floors and the first, second and third floors of Tower 2. Recreation facilities such as swimming pool and sitting out area will be provided on lower ground floor, ground floor and roof floors separately of the proposed development; and
- (e) other detailed comments are set out at **Appendix II**.

Geotechnical Aspect

9.1.7 Comments of the Chief Geotechnical Engineer/Slope Maintenance (CGE/SM), LandsD:

no objection to the application from slope maintenance point of view for the slope feature No. 6SE-C/CR476 in view of the following understanding based on the Geotechnical Planning Review Report (GPRR) and the maintenance records of the Slope Maintenance Section:

- (a) the whole slope feature is outside of and is adjoining the boundary line C-D of the Site;
- (b) the portion of the Site near to the boundary line C-D is demarcated as “unexcavated” in the GPRR; and
- (c) the GPRR stated that “The proposed works area is away from this feature (6SE-C/CR476). The design and construction of the proposed redevelopment is considered in such a way that the effect to this feature is insignificant and vice versa”.

Building Matters

9.1.8 Comments of the Chief Building Surveyor/New Territories West, Buildings Department (CBS/NTW, BD):

- (a) no comment on the application; and
- (b) other detailed comments are set out at **Appendix II**.

Fire Safety

9.1.9 Comments of the Director of Fire Services (D of FS):

- (a) no comment on the application subject to water supplies for firefighting and fire service installations being provided to the satisfaction of D of FS; and
- (b) 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 standard as stipulated in Section 6, Part D of the Code of Practice for Fire Safety in Buildings 2011, which is administered by BD.

Water Supply

9.1.10 Comments of the Chief Engineer/Construction, Water Supplies Department (CE/C, WSD):

- (a) no objection to the application; and
- (b) other detailed comments are set out at **Appendix II**.

Social Welfare

9.1.11 Comments of the Director of Social Welfare (DSW):

- (a) in view of the ongoing trend of an aging population, there has been a substantial demand for elderly services. HKPSG stipulates that the planning ratio of subsidised community care service is 17.2 subsidised service places per 1000 elderly persons aged 65 or above; and
- (b) upon reviewing the projected demand and the latest status of the planned projects in the Tsuen Wan District, primarily in the early or preliminary stages, and considering the absence of nearby DEs, DSW advises that the proposed 60-place DE can meet the service demand of the Tsuen Wan West area. Therefore, a bid for a 60-place DE remains valid.

Other Aspects

9.1.12 Comments of the Chief Engineer/Bridges and Structures (CE/B&S), HyD:

- (a) no objection to the application; and
- (b) it is noted that the minimum horizontal clearance requirement of 3.8m between the proposed structure and Ting Kau Bridge is indicated in the planning statement. CE/B&S of HyD has no comment on the submission from highway maintenance of Tsing Ma Control Area viewpoint.

9.1.13 Comments of the Commissioner of Police:

- (a) no comment on the application; and
- (b) other detailed comments are set out at **Appendix II**.

9.2 The following Government departments have no comment on/objection to the

application:

- (a) Chief Architect/CMD2, Architectural Services Department (CA/CMD2, ArchSD);
- (b) Head of Geotechnical Engineering Office, Civil Engineering and Development Department (H(GEO), CEDD);
- (c) Project Manager (West) (PM(W)), CEDD;
- (d) Project Manager (South) (PM(S)), CEDD; and
- (e) District Officer (Tsuen Wan), Home Affairs Department.

10. Public Comments Received During Statutory Publication Periods

During the statutory public inspection periods, a total of 160 public comments were received, including 142 supportive comments from individuals (**Appendix IIIa**), four objecting comments from the Village Representatives of Ting Kau Village and an individual (two from the same Village Representative) (**Appendix IIIb**) and 14 comments from the management office of Sea Cliff Lodge, a resident of Ting Kau Village and individuals providing suggestions/views on the proposal (**Appendix IIIc**). The major grounds of public views are summarised as follows:

Supporting Views/Providing Positive Views

- (a) in view of the lack of tourism facilities in the area, low accessibility of the Site, low occupancy rate of the existing hotel and sufficient supply of hotel rooms in Tsuen Wan area, the existing hotel is suitable to be redeveloped into a residential development with DE to optimise the use of land resources;
- (b) the proposed development with DE is responding to the housing policy to increase housing supply and support ageing in place;
- (c) in view of the lack of community facilities in the area, the DE in the proposed development will meet the demand for elderly services and enhance the living environment of the elderly;
- (d) the proposed development will generate job opportunities by redevelopment and bring vibrancy to the community by attracting other businesses to the area;
- (e) the flats in small to medium sizes in the proposed development will meet the diverse housing needs of different households;

Objecting Views/Concerns

- (f) the proposed development will cause adverse traffic and environmental impacts on the area. Redevelopment of the existing building will generate a significant amount of construction waste;
- (g) the increase in population of the proposed development will increase burden on the community facilities in the area and undermine the living quality of the local residents, and more community facilities should be provided;

- (h) the demolition of the existing hotel will result in loss in job opportunities and a loss of landmark with historical and cultural value;
- (i) the S.16 Scheme is not in line with the S.12A Scheme and redevelopment of the existing hotel for residential development has all along been the developer's intention;

Providing Suggestions/Views

- (j) the frequency of bus services should be increased in order to accommodate the increased population brought by the proposed development and the existing population;
- (k) given that the access road within the proposed development is the only road accessible to Sea Cliff Lodge (**Plan A-2**), the access road should be safe and barrier-free during the construction stage for the access of the residents of Sea Cliff Lodge;
- (l) there should not be adverse noise, air quality, environmental and geotechnical impacts on the area during the construction stage;
- (m) the demolition of the existing hotel and the construction of the proposed development might affect the building structures of Sea Cliff Lodge. The construction should be strictly and properly managed. If any damage is caused, the owners of Sea Cliff Lodge shall reserve all the rights to take legal actions and claim the damages; and
- (n) redevelopment of the existing building is not appropriate because its condition is not deteriorated.

11. Planning Considerations and Assessments

- 11.1 The applicant submits, for approval by the Board in accordance with the Notes of the OZP, the LP of the proposed redevelopment of the existing Royal View Hotel into a private residential development cum social welfare facility at the Site. The proposed development parameters, including GFA of not more than 29,400m², BH of not more than 77mPD (including rooftop structures) and provision of GIC facility of not less than 760m², conform to the respective restrictions under the Notes of the OZP. The LP has included the major development parameters, the location and broad layout of various uses/facilities, the form, disposition and heights of all buildings (including structures) to be erected on the Site and AQIA and NIA in examining the possible environmental problems and recommending mitigation measures as required under the Notes for the “R(B)2” zone under the OZP;

Planning Intention

- 11.2 The Site falls within an area zoned “R(B)2” on the OZP, which is intended primarily for medium-density residential developments. The proposed uses

including ‘Flat’ and ‘Social Welfare Facility’ are always permitted under the “R(B)2” zone and the development proposal is in line with the planning intention of the “R(B)2” zone.

Layout and Design Merits

Urban Design and Landscape

- 11.3 Under the S.16 Scheme, a building separation of not less than 15m between Towers 1 and 2 is proposed as a design measure to allow air flow and visual permeability (**Drawing A-1**). Moreover, landscape treatments will be provided in the form of tree and shrub planting, planters, roof gardens and feature paving. According to the landscape plans, open landscape area is proposed on LG/F of Tower 1, 1/F, 2/F and 3/F of Tower 2, and G/F and R/F of Towers 1 and 2 (**Drawings A-17 to A-20**). Not less than 1,820m² private open space will be provided at different levels, including the roof gardens on the rooftops of the two towers (**Drawings A-12, A-20 and A-34**). According to the LMP (**Drawing A-16**), a total of 66 existing trees are proposed to be felled and not less than 72 heavy standard size new trees are proposed to be planted within the proposed development. An overall greenery coverage of not less than 20% will be provided in accordance with the SBDG requirements.
- 11.4 In view of the above, CTP/UD&L of PlanD considers that the proposed development would unlikely induce significant adverse effects on the visual character of the surrounding townscape and the proposed design measures may promote visual interest and pedestrian comfort. She has no comment on the S.16 Scheme from urban design and landscape planning perspectives.

Design of the DE

- 11.5 As compared to the S.12A Scheme in which the proposed DE was accommodated on two separate floors, the current DE located on a single floor with separate access from the residential portion under the S.16 Scheme is more desirable (**Drawings A-4 and A-29**) to enhance convenience for the future DE users. With a view to enhancing accessibility of the DE, instead of locating its entrance far away from the Site entrance with lift access under the S.12A Scheme, close and direct access from the Site entrance with dedicated car parking and L/UL spaces will be provided outside the DE at the street level under the S.16 Scheme (**Drawing A-4**). Apart from the location, the internal layout of the DE will also be enhanced under the S.16 Scheme in terms of efficiency of space usage and navigation for the DE users by having linear corridor with activity rooms on both sides (**Drawing A-30**).
- 11.6 In responding to the Committee’s comments on the provision of private open space for the DE users, an open space of about 200m² out of the 1,820m² private open space, adjacent to the DE will be provided for shared use by the DE users under the S.16 Scheme (**Drawings A-4, A-17 and A-24**), which can only be achieved through redevelopment. Moreover, covered landscape area with canopy of about 2m in width will be provided to enhance comfort of the DE users (**Drawing A-32**). DSW has no comment on the design of the DE and

advises that the proposed 60-place DE can meet the service demand of the Tsuen Wan West area.

Other Design Aspects

- 11.7 For the maintenance works of Ting Kau Bridge, a minimum setback distance of 3.8m is proposed between the proposed development and Ting Kau Bridge (**Drawing A-15**), which is the same as that between the existing building and Ting Kau Bridge. In view of the proposed setback distance, CE/B&S of HyD has no comment on the application from highway maintenance of Tsing Ma Control Area viewpoint.

Technical Aspects

- 11.8 The quantitative AQIA and NIA have been conducted to evaluate the environmental problems and identify mitigation measures including regular watering of the haul road and the Site and provision of dust screens, sheeting or netting and vehicle washing facilities to minimise fugitive dust emission during the construction phase and adoption of acoustic window (baffle type), acoustic balcony (baffle type) and fixed glazing with/without maintenance window (**Drawing A-35**) to minimise the noise impact on the proposed development under the S.16 Scheme. DEP has no objection to the application subject to the incorporation of approval condition as set out in paragraphs 12.2 (a) and 12.2 (b) below.
- 11.9 To support the LP, other technical assessments, including TIA, SIA, DIA, EA and GPRR have been submitted. DEP has no comment on the SIA from sewerage planning perspective subject to the incorporation of approval condition as set out in paragraph 12.2 (c) below, and CE/MS of DSD has no objection to the incorporation of the approval condition. CE/MS of DSD has no comment on the DIA subject to the incorporation of the approval condition as set out in paragraph 12.2 (d) below. C for T has no objection to the TIA on public transport services aspect. Other relevant departments consulted including CHE/NTW of HyD, CGE/SM of LandsD, CBS/NTW of BD, D of FS, CE/C of WSD, CA/CMD2 of ArchSD, H(GEO) of CEDD, PM(W) of CEDD and PM(S) of CEDD have no objection to/no adverse comment on the application.

Public Comments

- 11.10 The supporting public comments are noted. Regarding the objections/concerns detailed in paragraph 10, the planning assessment above and the departmental comments in paragraph 9 are relevant. Regarding the concerns on the provision of community facilities, the existing and planned provision of GIC facilities and open space are generally adequate to meet the demand of the overall planned population in accordance with the requirements of HKPSG except shortfalls in provision of school places and hospital beds. As for the shortfalls in social welfare facilities, SWD adopts a wider spatial context/cluster in the assessment of provision of such facilities. These facilities should be carefully planned/reviewed by relevant bureaus/departments, and premises-based GIC facilities could be incorporated in future development/redevelopment in the

wider district when opportunities arise.

12. Planning Department's Views

- 12.1 Based on the assessment made in paragraph 11 above and having taken into account the public comments mentioned in paragraph 10 above, the Planning Department has no objection to the application.
- 12.2 Should the Committee decide to approve the application, it is suggested that the permission shall be valid until 20.12.2028, and after the said date, the permission shall cease to have effect unless before the said date, the development permitted is commenced or the permission is renewed. The following conditions of approval and advisory clauses are suggested for Members' reference:

Approval Conditions

- (a) the submission of a revised Air Quality Impact Assessment to the satisfaction of the Director of Environmental Protection or of the Town Planning Board;
- (b) the implementation of the noise mitigation measures identified in the Noise Impact Assessment to the satisfaction of the Director of Environmental Protection or of the Town Planning Board;
- (c) the implementation of the local sewerage upgrading/sewerage connection works identified in the Sewerage Impact Assessment to the satisfaction of the Director of Drainage Services or of the Town Planning Board; and
- (d) the implementation of the drainage scheme identified in the Drainage Impact Assessment to the satisfaction of the Director of Drainage Services or of the Town Planning Board.

Advisory Clauses

The recommended advisory clauses are attached at **Appendix IV**.

- 12.3 There is no strong reason to recommend rejection of the application.

13. Decision Sought

- 13.1 The Committee is invited to consider the application and decide whether to grant or refuse to grant permission.
- 13.2 Should the Committee decide to approve the application, Members are invited to consider the approval condition(s) and advisory clause(s), if any, to be attached to the permission, and the date when the validity of the permission should expire.
- 13.3 Alternatively, should the Committee decide to reject the application, Members

are invited to advise what reason(s) for rejection should be given to the applicant.

14. Attachments

Appendix I	Application form and letter received on 15.8.2024
Appendix Ia	Planning Statement with Technical Assessments
Appendix Ib	FI received on 22.10.2024
Appendix II	Detailed Departmental Comments
Appendices IIIa to IIIc	Public Comments
Appendix IV	Recommended Advisory Clauses
Drawing A-1	Layout Plan
Drawings A-2 to A-12	Floor Plans
Drawings A-13 and A-14	Section Plans
Drawing A-15	Plan Showing Setback Distance between Ting Kau Bridge and the Proposed Development
Drawing A-16	Landscape Master Plan
Drawings A-17 to A-20	Landscape Plans
Drawings A-21 to A-23	Landscape Section Plans
Drawing A-24	Open Space Demarcation Plan
Drawings A-25 to A-28	Photomontages
Drawings A-29 to A-31	Comparison between the S.12A Scheme and the S.16 Scheme
Drawing A-32	Plan Showing Open Space for the DE
Drawing A-33	Visual Illustrations of Open Space for the DE
Drawing A-34	Photomontage of the Roof Gardens
Drawing A-35	Proposed Noise Mitigation Measures in the Proposed Development
Plan A-1	Location Plan
Plan A-2	Site Plan
Plan A-3	Aerial Photo
Plans A-4 to A-6	Site Photos

**PLANNING DEPARTMENT
DECEMBER 2024**