

Reference WNLYFN/AGNES/03
Date 20 September 2024

By FAX and EMAIL

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

Dear Sir / Madam,

**Section 16 Planning Application
The Town Planning Ordinance (Chapter 131)**

**Proposed Minor Relaxation of Maximum Building Height and Plot Ratio
Restrictions for Permitted Composite Residential Development at
Wu Nga Lok Yeung, Fanling, New Territories**

**Minor Relaxation of Permitted Building Height Approved under
TPB No. A/FLN/30 to Facilitate Adoption of Modular Integrated Construction (TPB Ref: A/FLN/32)**

*(FSSTL 182 S.A, Lot Nos. 2020 S.A and 2021 S.B in D.D. 51
and Adjoining Government Land) [New Lot to be known as FSSTL No. 297]*

We write regarding the captioned Planning Application submitted to the Town Planning Board ("TPB") on 16 August 2024 and comments from various Government Departments were received, including Transport Department ("TD") and Water Services Department ("WSD") on 9 September 2024, Environmental Protection Department ("EPD") on 16 September 2024 and Drainage Services Department ("DSD") 19 September 2024.

Please find attached the Responses-to-Comments ("R-to-C") table in **Attachment 1** which has fully addressed the comments received. Please note that these responses are clarifications only and there are no changes to the S16 Planning Application.

Should there be any queries, please do not hesitate to contact Ms Agnes Leung or the undersigned.

Yours faithfully,
FOR AND ON BEHALF OF
TOWNLAND CONSULTANTS LIMITED



Vincent Lau
Associate Director
VIN/AGNES/yv

Enc – SIP

cc Client / Team
Ms. LEE Wing Sum, Winsome TP/ FSSDPO

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PT TOWNLAND INTERNATIONAL (Indonesia)

HOWARD & SEDDON PARTNERSHIP (United Kingdom)



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PROPOSED MINOR RELAXATION OF MAXIMUM BUILDING HEIGHT AND PLOT RATIO RESTRICTIONS FOR PERMITTED COMPOSITE RESIDENTIAL DEVELOPMENT AT WU NGA LOK YEUNG, FANLING, NEW TERRITORIES

MINOR RELAXATION OF PERMITTED BUILDING HEIGHT APPROVED UNDER TPB NO. A/FLN/30 TO FACILITATE ADOPTION OF MODULAR INTEGRATED CONSTRUCTION (TPB REF: A/FLN/32)

Comments/ Suggestions		Applicant's Responses
A.	Comments received from Transport Department on 9.9.2024 (Contact Person: Mr Hoffman Chu (Tel.: 2399 6933)):	
1.	It is understood that the proposed development would provide about 2,300 flats under the current application, which is about +85.5% or 1,060 flats compared with the approved application No. A/FLN/30. In this connection, would the Applicant please carry out a traffic impact assessment to support the application.	<p>Please be clarified that the subject S16 Planning Application solely seeks for Minor Relaxation of the permitted Building Height approved under Planning Application No. A/FLN/30 for a Permitted Composite Residential Development to facilitate adoption of Modular Integrated Construction (“MiC”). Specifically, this application is submitted under Clause 11 of the Joint Practice Note No.8: https://www.bd.gov.hk/doc/en/resources/codes-and-references/practice-notes-and-circular-letters/joint/JPN08.pdf</p> <p>Please also note that the Site is zoned “Residential (Group A)1” on the prevailing Outline Zoning Plan, and <u>no increase to the approved Plot Ratio of 7.2 (of which 6.0 is domestic)</u> is proposed under this S16 Planning Application, in which no adverse traffic impact is anticipated. Please also note that the Permitted Composite Residential Development is subject to General Building Plans (“GBP”) Approval (latest Amendment 1) approved on 25 July 2024, of which the development is approved for the development of about 2,300 flats. Accordingly, all internal transport provisions will be provided in accordance with the Land Grant requirements.</p> <p>Notwithstanding, a Traffic Review has been conducted to evaluate the traffic impact due to the change of the number of flats from 1,240 to 2,300 (Attachment 2 refers). The Traffic Review concludes that the traffic impact on critical junctions and road links in the vicinity of the Permitted Composite Residential Development taking into account the traffic generation and attraction induced by the change of the number of flats from 1,240 to 2,300 (correspondingly a drop of average flat size) would be insignificant and could be absorbed by the adjacent road networks. Hence, it is anticipated there will be no adverse traffic impact due to the Permitted Composite Residential Development from traffic engineering point of view.</p>

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Comments/ Suggestions	Applicant's Responses
<p>B. <u>Comments received from Construction Division of Water Supplies Department on 9.9.2024 (Contact Person: Mr Nelson C C Lo (Tel.:2152 5748)):</u></p>	
<p>1. <u>Major Comments on the Application/Main Reasons of Objection:</u></p> <p>a. (a) Please provide the population intake date;</p> <p>b. (b) Please include a water main connection proposal in your submission.</p> <p>2. <u>Other Detailed Comments (if applicable):</u></p> <p>Existing water mains inside the proposed site as shown in the MRP may be affected. The applicant is required to either divert or protect the water mains found on site.</p> <p>If diversion is required, existing water mains inside the proposed site areas are needed to be diverted outside the site boundary of the proposed site 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 proposal to WSD for consideration and agreement before the works commence.</p> <p>If diversion is not required, the following conditions shall apply:</p>	<p>Please note that the date of population intake is tentatively 2029.</p> <p>Please be clarified that the subject S16 Planning Application solely seeks for Minor Relaxation of Permitted Building Height approved under Planning Application No. A/FLN/30 for a Permitted Composite Residential Development to facilitate MiC adoption. Besides the increase in Building Height, no other changes to the approved GBP scheme is anticipated under this S16 Planning Application submitted in line with Clause 11 of Joint Practice Note No. 8 on Enhanced Facilitation Measures for Buildings Adopting Modular Integrated Construction. Relevant submissions to Relevant Government Departments, including Water Main Connection Proposal will be made during the detailed design stage as required and WSD's approval will be sought should there be any relocation of the existing Government Water Mains in accordance to the Land Grant Conditions.</p> <p>Noted.</p>

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Comments/ Suggestions		Applicant's Responses
a.	Existing water mains are affected as indicated on the site plan and no development which requires resiting of water mains will be allowed.	Noted.
b.	Details of site formation works shall be submitted to the Director of Water Supplies for approval prior to commencement of works.	Noted.
c.	No structures shall be built or materials stored within 1.5 metres 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 Director of Water Supplies or their contractor to carry out construction, inspection, operation, maintenance and repair works.	Noted.
d.	No trees or shrubs with penetrating roots may be planted within the Water Works Reserve or in the vicinity of the water main(s) shown on the plan. No change of existing site condition may be undertaken within the aforesaid area without the prior agreement of the Director of Water Supplies. 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.	Noted.
e.	No planting or obstruction of any kind except turfing shall be permitted within the space of 1.5 metres around the cover of any valve or within a distance of 1 metre from any hydrant outlet.	Noted.
f.	Tree planting may be prohibited in the event that the Director of Water Supplies considers that there is any likelihood of damage being caused to water mains.	Noted.
C.	<u>Comments received from Environmental Protection Department on 16.9.2024 (Contact Person: Ms Trista Lau (Tel.:2835 1152)):</u>	
1.	The standard Noise Impact Assessment and Sewerage Impact Assessment clauses have been incorporated into the relevant land exchange documents. EPD has no in-principle objection to the planning application from environmental planning perspective.	Noted.

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<p>2.</p>	<p>Due to significant increase in the flat numbers, the applicant is required to briefly elaborate if adverse environmental impact (in particular sewage, noise) will happen or not for the sake of better presentation.</p>	<p>Please note that the subject S16 Planning Application solely seeks for Minor Relaxation of the permitted Building Height approved under Planning Application No. A/FLN/30 for a Permitted Composite Residential Development to facilitate MiC adoption. No adverse environmental impacts are anticipated arising from the relaxation of the BH from 140mPD approved Planning Application No. A/FLN/30 to 144.14mPD (i.e. +2.96% increase) to facilitate MiC adoption. <u>There is no change to the approved PR under Planning Application No. A/FLN/30.</u></p> <p>Please note that per the Land Grant Conditions, a Sewage Impact Assessment (“SIA”) has been separately conducted to the satisfaction of Sewage Infrastructure Group of Drainage Services Department (“DSD”). As the capacity of the existing sewage pipe along Ma Sik Road is limited, it is advised that there will be another sewage pipe at the east of the Site after coordination with DSD and Civil and Engineering and Development Department (“CEDD”). Subject to the increase of flat numbers and the corresponding increment on sewerage flow generated, two discharge outlet points will be adopted (Existing pipe at Ma Sik Road and proposed pipe at the eastern portion of the Site) to reduce the flow for each pipe. As such, it is anticipated there will not be an adverse impact in terms of sewerage aspect after distributing the generated sewerage to two discharge points.</p> <p>In respect to potential noise impacts, as indicated in A/FLN/30, the Noise Impact Assessment concluded that no exceedance of the traffic noise standard was predicated with the adoption of a number of committed and proposed noise mitigation measures at adjacent roads, i.e. Mak Sik Road and Road L1, and with at-source mitigation measures in place. As per the Land Grant Conditions, a Noise Impact Assessment will be conducted to EPD’s satisfaction at the detailed design stage to further evaluate the potential noise impacts. Noise mitigation measure (e.g. baffle type acoustic window) and the proposed at-source mitigation measures mentioned in A/FLN/30 will be reviewed and updated as necessary upon detailed design to ensure compliance to relevant noise standards. With the insignificant change of traffic attraction/generation as mentioned in Item A1 above, no adverse noise impacts are expected. Furthermore, while MiC adoption can help to reduce nuisances arising from on-site construction due to the reduced site works, the construction noise during development will be controlled through contract clauses with noise mitigation measures and good site practices implemented where necessary to ensure the compliance of Noise Control Ordinance (Cap. 400). In this regard,</p>
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Comments/ Suggestions		Applicant's Responses
		construction noise impact is anticipated to be insignificant.
D.	<u>Comments received from Drainage Services Department on 19.9.2024 (Contact Person: Mr Keith Liu (Tel.: 2300 1595):</u>	
1.	No in-principle objection on the application from public drainage point of view.	
2.	Owing to the significant increase in the flat numbers (+85.5%), the applicant is required to briefly elaborate if adverse sewage impact will be incurred or not in the application for better clarity.	<p>Please note that the subject S16 Planning Application solely seeks for Minor Relaxation of the permitted Building Height approved under Planning Application No. A/FLN/30 for a Permitted Composite Residential Development to facilitate MiC adoption. No adverse environmental impacts are anticipated arising from the relaxation of the BH from 140mPD approved Planning Application No. A/FLN/30 to 144.14mPD (i.e. +2.96% increase) to facilitate MiC adoption. <u>There is no change to the approved PR under Planning Application No. A/FLN/30.</u></p> <p>Please note that per the Land Grant Conditions, a SIA has been separately conducted to the satisfaction of Sewage Infrastructure Group of DSD. As the capacity of the existing sewage pipe along Ma Sik Road is limited, it is advised that there will be another sewage pipe at the east of the Site after coordination with DSD and CEDD. Subject to the increase of flat numbers and the corresponding increment on sewerage flow generated, two discharge outlet points will be adopted (Existing pipe at Ma Sik Road and proposed pipe at the eastern portion of the Site) to reduce the flow for each pipe. As such, it is anticipated there will not be an adverse impact in terms of sewerage aspect after distributing the generated sewerage to two discharge points.</p>

It is noted that the following Government Departments has no objections to /no adverse comments to the S16 Planning Application:

- Highways Department
- Hong Kong Police Force
- Social Welfare Department

Date: 20 September 2024

File Ref: WNLYFN