

Reference WNLVFN/AGNES/04
Date 23 September 2024

By HAND 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 received from various Government Departments, including Urban Design and Landscape Unit and District Planning Office of Planning Department on 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/ly

Enc – SIP

cc Client / Team
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HOWARD & SEDDON PARTNERSHIP (United Kingdom)



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Certificate No.: CC844

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 Urban Design and Landscape Unit of Planning Department on 19.9.2024 (Contact Person: Ms Nicole Lee (Tel.: 3565 3945)): | |
| 1. | Our comments on the visual appraisal relating to the assessment area and selected VPs previously raised during the pre-submission stage are not duly addressed. | <p>PlanD's comment that "VPs which are publicly accessible and providing long-range, medium-range and close-range views would be appropriate" and that "they should be determined with reference to the setting of the project and views of local significance" is noted. With reference to the Approved TPB No. A/FLN/30 (which includes the Site as part of its Application) and in determining the VPs to be appraised, three (3) public viewing points that are easily accessible to the public, such as key pedestrian nodes, public areas for outdoor facilities, recreation, rest, leisure, walking, and travel routes were identified.</p> <p>Two VPs were selected from the VIA in support of the Approved S16 Application TPB No. A/FLN/30 relevant to the Application Site were selected, namely VPA5 (View from Ling Shan Road), a short-range static VP that represents the vantage points of pedestrian passers-by, workers of the open-air carpark and nearby residents; and VPF3 (View from Tsung Shan, High Hill), a long-range static VP that represents the viewpoints of visitors of the hiking trail who wish to enjoy the panoramic view of Fanling North New Development Area ("FLN NDA").</p> <p>In view that the VA is conducted in support of the subject S16 Planning Application which solely seeks for Minor Relaxation of the permitted Building Height of 140mPD approved under Planning Application No. A/FLN/30 to 144.14mPD (i.e. +2.96% increase) for a Permitted Composite Residential Development to facilitate MiC adoption, an additional short-range public viewpoint (VP3) was selected to allow for better assessment of the potential visual impact compared to an additional medium-or-longer range VP where the minor increase in BH seen at a farther distance may be visually less distinct. VP3 is a short-range static VP located within the Fen Leng Lau Road Playground, which is considered a highly accessible public area for users and visitors to rest, sitting out, leisure and carry out recreational activities. As demonstrated in Figure 6 of the VA, the Proposed Development can be visible, in addition to other residential developments (including Fan Garden, Wing Fok Centre, and a Planned Residential Development).</p> |

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| Comments/ Suggestions | Applicant's Responses |
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| <p>2. The definition of assessment area as stated in paragraph 4.1 is not accurate. According to the TPB PG-No. 41, the assessment area is expected to cover the area of visual influence within which the proposed development is pronouncedly visible from key sensitive viewers. The actual assessment area, i.e. the visual envelope, should be determined having regard to the size of the proposed development, the distance of the development and its potential visibility from the selected viewing points, and the actual site and surrounding topographical conditions by ground inspection. Please review the defined assessment area.</p> | <p>It is noted that the Assessment Area for Visual Impact Assessments is expected to cover the area of visual influence within which the proposed development is pronouncedly visible from key sensitive viewers. The actual assessment area, i.e. the visual envelope, should be determined having regard to the size of the proposed development, the distance of the development and its potential visibility from the selected viewing points, and the actual site and surrounding topographical conditions by ground inspection.</p> <p>This Visual Appraisal adopts an "Initial Assessment Area Boundary" which is equivalent to approximately three (3) times the overall BH of the Proposed Development which is considered appropriate for the purpose of this Appraisal. Updated Paragraph 4.1 and Figure 3 of the VA is provided in Attachment 2.</p> |
| <p>3. The applicant is required to indicate the BH permitted under OZP and approved application No. A/FLN/30 on the photomontages of the proposed scheme for easy reference.</p> | <p>Figures 4 to 6 of the VA are updated accordingly (Attachment 2 refers).</p> |
| <p>4. Existing views of the selected VPs should be provided for easy reference.</p> | <p>Figures 4 to 6 of the VA are updated accordingly (Attachment 2 refers).</p> |
| <p>5. The current presentation of the photomontages is quite confusing, the consultant may wish to indicate the application site in different colour.</p> | <p>Figures 4 to 6 of the VA are updated accordingly (Attachment 2 refers).</p> |
| <p>6. VPA5 – according to the viewing angle, view fan and VP location as shown in figure 3, the proposed development should be located towards the left edge of the photomontage. The accuracy of the photomontage and/or VP location is in doubt, please review.</p> | <p>The location of VP has been updated accordingly (Updated Figures 3 and 4 of the VA in Attachment 2 refers).</p> |
| <p>7. VP3 – according to the viewing angle, view fan and VP location as shown in figure 3, the proposed development should be located towards the right of the photomontage. The accuracy of the photomontage and/or VP location is in doubt, please review.</p> | <p>The location of VP has been updated accordingly (Updated Figures 3 and 6 of the VA in Attachment 3 refers).</p> |

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| Comments/ Suggestions | | Applicant's Responses |
|-----------------------|--|---|
| B. | Comments received from District Planning Office of Planning Department on 19.9.2024 (Contact Person: Ms Winsome Lee (Tel.: 3168 4044): | |
| 1. | Please confirm the population and tentative completion year of the proposed development; and the increase in flat production compared with the PR and BH permitted under the OZP. | While the Approved S16 Planning Application No. A/FLN/30 assumed an indicative flat production of 1,240 units, 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 (correspondingly a drop of average flat size). Similarly, the Permitted Composite Residential Development under this Application assumes the production of about 2,300 units and is anticipated to be completed in 2029. <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 |
| 2. | Please provide plans showing the landscape treatment, open space provision and greenery provision of the proposed development for indicative purpose. | An indicative Landscape Plan is provided in Attachment 3 . Private Open Space of not less than 1m ² per person (About 6,440m ²) will be provided at the Application Site for resident’s enjoyment according to Hong Kong Planning Standards and Guidelines. A minimum 20% overall site coverage of greenery will be provided in accordance with Sustainable Building Design Guidelines (“ SBDG ”) (PNAP APP-152). The Landscape Design is indicative only and will be further refined during the detailed design stage, will adopt the principles of improving the quality of residents and the environmental quality of the urban space, in particular at the pedestrian and podium level and to mitigate heat island effect. |
| 3. | Please elaborate the planning and design merits to be provided for the proposed development to support the minor relaxation of PR and BH. Please confirm if there is building setback and building separation to be provided in accordance with the Sustainable Building Gridlines/Hong Kong Planning Standards and Guidelines and indicate on the relevant plans. | This S16 Planning Application solely seeks for a very minor relaxation of the BH from 140mPD to 144.14mPD (approx. +4.14m or +2.96% increase from 140mPD approved under TPB No. A/FLN/30) to facilitate MiC adoption. There is <u>no change</u> to the approved PR under TPB No. A/FLN/30. This is fully in line with Government’s policy initiative and JPN No. 8 in actively promoting and encouraging the adoption of MiC in the construction industry. This Application also set a desirable precedent case for promoting MiC application in new developments and is considered to be appropriate and beneficial to the overall Proposed Development, the construction industry and environment. The minor increase in BH is also considered compatible with the surrounding developments without compromising the original planning and urban design principles of Fanling North NDA and continues to respect the |

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| | <p>intended stepped building height profile of the area, stepping down from district nodes towards the periphery and riverside to allow better integration with the adjacent rural setting as well as maintain the height variations within the area.</p> <p>Furthermore, the Non-Building Area (“NBA”) imposed on the Application Site on the Approved OZP is maintained, which preserves the prominent breezeway and continues to allow the diversion and penetration of prevailing annual wind from the eastern quadrant and the prevailing summer wind from the south-western quadrant through NBA on the Site to the wider Fanling area.</p> <p>In addition, the Committed Composite Residential Development will prioritize a Sustainable and Quality Living Environment by incorporating a range of planning and urban design elements, including integration of multi-level greenery, hard and soft landscaped areas and spaces, prioritising pedestrian connectivity through the Site, and energy-efficient building design where applicable. By adopting these strategies, the Applicant intends to create a vibrant community that fosters both environmental sustainability and a high quality of life for residents.</p> <p>Please also be clarified that the Proposed Development will comply with SBDG, including building separation, building setback and site coverage of greenery (SCG) requirements (minimum 20% overall site coverage of greenery). The following aspects are reflected in the General Building Plans approved by Buildings Department:</p> <p><u>Building Separation</u>: The actual projected façade length (Lp) of low zone and high zone are smaller than the maximum Lp of 164.160m and 89.50m respectively, i.e. the building separation requirement is complied.</p> <p><u>Building Setback</u>: Since the width of Ma Sik Road and Planned Road L1 is 48m and 22.5m while no part of the building up to level of 15m above the street level would be within 7.5m from the centreline of the street, the setback requirement of the building fronting the streets was not imposed, i.e. the setback requirement is complied. <u>Site Coverage of Greenery</u>: The proposed design demonstrated both primary zone and overall site coverage of greenery have fulfilled the requirement of minimum overall site coverage of greenery (approx. 2886.4 sq.m.) and the greenery area at primary zone (approx. 1443.2 sq.m).</p> |

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| <p>4. Please elaborate the mitigation measures to be provided in order to address any potential visual and air ventilation impacts.</p> | <p>The above will be further refined as required in subsequent building submissions during detailed design stage. In any event, SBDG will be complied with.</p> <p>Please note that this S16 Planning Application for Minor Relaxation of permitted Building Height approved under A/FLN/30 from 140mPD to 144.14mPD (+2.96% increase) for the Permitted Composite Residential Development is to solely facilitate MiC adoption.</p> <p>As demonstrated in the VA in support of this S16 Planning Application, when compared with the Approved Scheme, the Proposed Scheme with the adoption of MiC would not result any significant or adverse visual impact from the public viewpoints. The minor increase in BH is marginal and would not result in degradation to the visual quality and character of the high-density residential neighbourhood. The Proposed Development is considered compatible with the surrounding high-rise residential developments in terms of scale, height and character.</p> <p>The proposed minor increase in BH for MiC adoption does not lead to a significant increase in the building's bulkiness. <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. The Proposed Development maintains the NBA stipulated on the Application Site on the Approved OZP which continues to allow the diversion and penetration of the prevailing annual wind from the eastern quadrant and the prevailing summer wind from the south-western quadrant through the NBA as the breezeway that facilitate the airflow to the wider Fanling area. The minor increase in BH is unlikely to result in any adverse air ventilation impacts.</p> <p>Furthermore, quality and sustainable building design requirements as stipulated in PNAP APP-151 and APP-152 are complied with to improve air ventilation, enhance the environmental quality at pedestrian level and mitigate heat island effects arising from the undesirable screening effect of long buildings at different levels and building sites.</p> |

Date: 23 September 2024

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