



Reference WNLYFN/AGNES/08
Date 18 November 2024

By HAND & 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.

Further comments from Planning Department was received on 13 November 2024. Please find attached in **Attachment 1** the Responses-to-Comments ("R-to-C") table providing our consolidated and comprehensive response for your information. As demonstrated, this S16 Planning Application for minor relaxation of permitted building height by 4.14m for adopting Modular Integrated Construction (MiC) under JPN No. 8 on the basis of the already approved General Building Plan for the Permitted Composite Residential Development is well justified and warrants favourable consideration by the TPB.

Please note that these responses are consolidated justifications and minor clarifications only, and there are no changes to the S16 Planning Application. Since this Application is only for minor relaxation of building height to facilitate the MiC approach which is in line with the Government's initiatives in promoting the MiC and the Applicant endeavours to take the opportunity to implement such innovative technology in expediting the construction process and housing delivery as early as possible in addressing the acute housing needs of the community, we kindly request the TPB consider the Application at the earliest TPB meeting.

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市
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MAIN HONG KONG OFFICE :

2801, 28th Floor, 148 Electric Road, North Point, Hong Kong
Telephone : (852) 2521 2911 Facsimile : (852) 2521 6631
E-mail address : tcld@townland.com Website : www.townland.com

CHINA OFFICE :

Room 1111, Building 1, Yagang Industry and Trade Building, No.18 Fuan Avenue,
Hehua Community, Pinghu Street, Longgang District, Shenzhen, PRC. Postal Code 518111
Telephone : (86) 181 2417 9366
E-mail address : tcld@townland.com

INDIA OFFICE :

Coworking Space Ministry of New, 3rd Floor, Kitab Mahal,
192 Dr Dadabhai Naoroji Road, Azad Maidan, Fort, Mumbai, India
Telephone : (91) 9819919804
E-mail address : tcpl@townland.com

INDONESIA OFFICE :

Gedung Menara Anugrah, Lantai 21
Kantor Taman E.3.3, Jl. DR. Idr Anak Agung Gde Agung Lot.8.6-8.7
Kawasan Mega Kuningan, Jakarta Selatan 12950, Indonesia
Telephone : (62 21) 2941 0621
E-mail address : tcjkt@townland.com

ASSOCIATED COMPANIES :

TOWNLAND CONSULTANTS (INTERNATIONAL) LIMITED (International)

TOWNLAND CONSULTANTS (SHENZHEN) LIMITED (China)

TOWNLAND CONSULTANTS PVT. LIMITED (India)

PT TOWNLAND INTERNATIONAL (Indonesia)

HOWARD & SEDDON PARTNERSHIP (United Kingdom)



ISO 9001: 2015
Certificate No.: CC844

Reference WNL YFN/AGNES/08
Date 18 November 2024

The Secretary, Town Planning Board
c/o Planning Department

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

cc Client / Team
[REDACTED] STP/ FSSDPO
[REDACTED] TP/ FSSDPO

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.	<u>Comments received from District Planning Office of Planning Department on 13.11.2024 (Contact Person: Ms Winsome Lee (Tel.: 3168 4044):</u>	
1.	Please consolidate the information regarding the development proposal with elaborations on the planning and design merits and mitigation measures to be provided to support the minor relaxation of PR and BH, such as building separation, building setback, provision of greenery features/tree planting, and how the NBA incorporated in the proposed development etc.	<p>As previously indicated, there is <u>no increase to the approved Plot Ratio of 7.2 (of which 6.0 is domestic)</u> per se – vis-à-vis CEDD's approved S16 for the Fanling North New Development Area under TPB No. A/FLN/30 - is proposed under this S16 Planning Application. In fact, Land Grant Clauses have been formulated and relevant General Building Plan (GBP) has already been approved on the basis of the approved Plot Ratio of 7.2.</p> <p>This S16 Planning Application is <u>solely</u> a response to current Government's initiative in promoting green and innovative buildings and adopting MiC, seeking for a minor relaxation of the BH from 140mPD to 144.14mPD (approx. <u>+4.14m</u> or +2.96% increase from 140mPD approved under TPB No. A/FLN/30) to facilitate MiC adoption, amongst others, accommodating the thicker slabs needed by MiC.</p> <p>This S16 Planning Application is well justified on the following grounds: <u>In Line with Government Policy and Desirable Precedent for MiC Adoption</u> This S16 Planning Application 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. Given the MiC approach will manufacture the freestanding volumetric modules and complete with finishes, fixtures, and fittings offsite and the modules are then transported to the construction site for assembly, the approach would significantly uplift the quality control, enhance construction site safety, expedite the construction process, minimise the disturbance and nuisance to the area and reduce waste.</p> <p>To this end, the early approval of this Application will enable the adoption of MiC to accelerate the speed of construction for timely delivery of residential flats in addressing the prevailing acute housing needs of the community. It is considered that the Proposed Development will contribute notable positive impacts to housing sector and the public.</p> <p>It should be noted that Approved GBPs by the Building Authority has already been secured. In this regard, timely approval of this Application in view of the inherent need of the construction method will provide a clear message of supporting the MiC technically for the benefit of the industry and the public at large as aforementioned, or there is lack of incentives for</p>

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Comments/ Suggestions	Applicant's Responses
	<p>the industry to adopt such. It will set a desirable precedent for a wider adoption of MiC approach in future new developments.</p> <p><u>In Line with Statutory Planning Intention and No Increase in Permitted Development Intensity</u></p> <p>The Proposed Development is fully in line with the Statutory Planning Intention of the “R(A)” zone primarily for high-density residential developments and where commercial uses are always permitted on the lowest two floors of a building excluding basements. Furthermore, the Proposed Development is fully compatible with the surrounding high-density residential area. There is an increase in development intensity as approved under TPB No. A/FLN/30.</p> <p><u>Incorporation and Preservation of Non-Building Area within the Permitted Composite Residential Development</u></p> <p>As the fundamental design principle for this case, the Proposed Development has maintained the Non-Building Area (“NBA”) as designated on the Application Site on the Approved OZP. The Proposed Development preserves the prominent breezeway in a northeast-southwest direction that allows the diversion and penetration of prevailing annual wind from the eastern quadrant, as well as the prevailing summer wind from the south-western quadrant through NBA on the Site to the wider Fanling area, as identified in the “Expert Evaluation on Air Ventilation Assessment” done by the Government in respect to this planning scheme area.</p> <p>In addition to facilitating wind penetration to the Fanling Area, the Proposed Development will incorporate suitable landscape greenery with a seamless and well-crafted design for the public enjoyment that is also aesthetically pleasing. As previously indicated, not less than 20% overall site coverage of greenery will be provided in accordance with Sustainable Building Design Guidelines (“SBDG”) (PNAP APP-152). A refined Conceptual Landscape Proposal is provided in Attachment 2 for reference. The Applicant will further review the landscape design during the detailed design stage to incorporate further greenery where practical.</p> <p><u>Maintaining the Stepped Building Height Profile</u></p> <p>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 intended stepped building height profile of the area, stepping down from</p>

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	<p>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 (Figure 5.1 of the Supplementary Planning Statement refers).</p> <p><u>Promotion of Environmental Sustainability and Maximising Greening Opportunities</u></p> <p>Prioritising Sustainable and Quality Living Environment is one of the design concepts for the Permitted Composite Residential Development. As demonstrated in Attachment 2, various planning and urban design elements have been incorporated into the planning and design of the Proposed Development, including integration of multi-level greenery with hard and soft landscaped areas and spaces at G/F and residents' recreational facilities at 2/F and 3/F podium to enhance the overall environment, promote sustainability, and foster a sense of community. Design of private open spaces will be welcoming and inviting so as to encourage movement of pedestrians along safe and attractive corridors and provide comfort and enjoyment to users. In addition, to improve the environmental quality of the urban space, in particular at the pedestrian level and to mitigate heat island effect.</p> <p>The Proposed Development also prioritising pedestrian connectivity through the Site at G/F through the Landscaped Areas and NBA and through thoughtful retail planning of the podium retail spaces to ensure seamless pedestrian circulation so that residents and visitors to the retail podium can move easily and comfortably across the site. During detailed retail planning design, thoughtful retail planning will incorporate wide, inviting entrances that lead directly from pedestrian pathways.</p> <p>Private car parking provision will be provided in accordance with HKPSG recommendations below grade to maximise the areas at G/F for pedestrians and greenery opportunities. This would also avoid additional bulk as a result of carparking should it be provided above grade. The space and greenery opportunities at pedestrian level may be compromised somehow unavoidably.</p> <p>Private Open Space of not less than 1m² per person (About 6,440m²) will be provided at the Application Site for resident's enjoyment according to Hong Kong Planning Standards and Guidelines.</p>

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Comments/ Suggestions	Applicant's Responses
<p>2. Please elaborate the mitigation measures to be provided in order to address any potential visual and air ventilation impacts. Please confirm if there is building setback and building separation to be provided in accordance with the Sustainable Building Guidelines/Hong Kong Planning Standards and Guidelines and indicate on the relevant plans (if any).</p>	<p>Energy-efficient building design will be considered during detailed design where applicable, such as the integration of energy-saving technologies, the careful selection of building materials, and the application of passive design strategies to optimize energy consumption and reduce the overall carbon footprint of the development.</p> <p>The Proposed Development will comply with SBDG, including building separation, building setback and site coverage of greenery (SCG) requirements (not less than 20% overall site coverage of greenery).</p> <p>As demonstrated, the Proposed Development with notable planning and design merits in addition to the benefits brought on by the adoption of MiC has reflected the Applicant's endeavours to create a vibrant community that foster both environmental sustainability and a high quality of life for residents.</p> <p>As demonstrated in the VA in support of this S16 Planning Application, when compared with the Approved Scheme, the Proposed Scheme with an increased BH as result of the adoption of MiC (increase in BH from 140mPD to 144.14mPD (+2.96% increase)) 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>Furthermore, the Applicant has strong intentions to enhance the visual interest of the Permitted Composite Residential Development by incorporating multi-level and vertical greenery, which help soften the building bulk, harmonise with its surroundings and integrate with the setting of Ng Tung River.</p> <p>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. This NBA also offers a visual connection through the Application Site promoting a sense of openness and transparency. The Applicant has strong intention to incorporate via the NBA and strives to maximise the opportunities to enhance air ventilation on the Application</p>

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Comments/ Suggestions	Applicant's Responses
<p>3. The justifications for the increase in flat number and change in average flat size, compared with the last approved application No. A/FLN/30.</p>	<p>Site as far as possible. The minor increase in BH is unlikely to result in any adverse air ventilation impacts.</p> <p>As indicated in our response in A(1), the building separation, building setback and site coverage of greenery (SCG) of the Permitted Residential Development will duly comply with SBDG requirements, which are also reflected in the approved General Building Plans.</p> <p>It is understood that assumptions were made by the Government in the review of the development capacity of FLN NDA, including the Application Site with a view to enhancing development intensity. In this regard, the BH and PR restrictions imposed on the Application Site were relaxed under the Approved TPB No. A/FLN/30. A <u>Plot Ratio of 7.2 (of which 6.0 is domestic)</u> was approved for the Application Site. Under Government's NENT NDA Study and subsequent Planning and Engineering Review in 2014 and 2021, an average Flat Size of 70sqm (with 2.7 persons per flat) was assumed, resulting to an assumed flat production of 1,240. It is noted that this notional scheme in the indicative layout plan and its assumptions under TPB No. A/FLN/30 are prepared for technical assessment purposes in an area context and are subject to change at detailed design stage.</p> <p>Recognizing the urgent demand for housing and evolving market trends, the Applicant has undertaken comprehensive internal assessments to align the development with both current needs and future residential expectations. As a result of these analyses, the Applicant proposes an average flat size of approx. 38.76sqm resulting to approx. 2,300 units under the Proposed Development.</p> <p>General Building Plans ("GBP") Approval (latest Amendment 1) has already been sought on 25 July 2024, of which the development is approved for the development of about 2,300 flats. There is <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. Moreover, no requirement in relation to the flat number and flat size are stipulated in the Land Grant requirements. It is also noted that the Site is zoned "Residential (Group A)1" on the prevailing Outline Zoning Plan and there is no statutory requirement on the flat number and flat size under the planning framework. Given these, a composite development can in fact be readily implemented, whilst this Application is indeed the Applicant's endeavour and incentive to adopt MiC without compromising the living quality of future residents.</p>

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Comments/ Suggestions	Applicant's Responses
<p>4. Please confirm whether the reason (ii) below is correct: The proposed increase of flat number from about 1,024 flats to about 2,300 flats is due to:</p> <p>(i) a reduction in average flat size from 70 sqm to 40 sqm; and</p> <p>(ii) a 10% increase of MiC floor area (i.e. 86,592 sqm x 10%) which can be exempted according to JPN No. 8.</p>	<p>This S16 Planning Application has demonstrated that the Permitted Composite Residential Development providing approx. 2,300 flats will not result in any adverse traffic and infrastructural impacts (Our Letters under Ref: WNLYFN/AGNES/03 and 07 refers).</p> <p>Please refer to response to point 3 above.</p> <p>Please note that the adoption of MiC may involve repetitive double walls between MiC modules, thicker enclosure walls to cater for rigging and hoisting during transportation and assembly on site, as well as lengthened common corridors and internal doorways due to the double or thickened MiC walls, larger core structure, etc. Per JPN No. 08, GFA concessions may be granted under the Buildings Ordinance to facilitate the adoption of MiC and associated floor area that may be needed in MiC under the Building Regime.</p> <p>Under this S16 Planning Application, there is no change to the permitted Domestic GFA (Domestic PR of 6.0) approved under TPB No. A/FLN/30. Possible GFA exemptions / concessions allowable under BO which are predominantly to compensate for floor area required for the adoption of MiC is excluded from the calculation of the Accountable Domestic GFA of not more than 86,592m² (per Domestic PR of 6.0) and will be subject to approval by relevant Authorities during detailed design stage.</p>

Date: 18 November 2024

File Ref: WNLYFN

Attachment 2

REFINED CONCEPTUAL LANDSCAPE
PROPOSAL



LEGEND

- SITE BOUNDARY
- RETAIL
- LANDSCAPE AREA - LAWN
- HARD-PAVED AREA
- RESIDENTIAL LIFT / CIRCULATION CORE
- TREE
- SHRUB

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 Proposed Scheme - GF Plan
 30-07-2024 (Indicative only)
 1:600 (A3)





LEGEND

- SITE BOUNDARY
- RESIDENT'S CLUBHOUSE
- LANDSCAPE AREA - LAWN
- HARD-PAVED AREA
- E&M
- RESIDENTIAL LIFT / CIRCULATION CORE
- SHRUB

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Proposed Scheme - 2F Plan
 30-07-2024 (Indicative only)
 1:600 (A3)





LEGEND

- SITE BOUNDARY
- RESIDENTIAL LIFT / CIRCULATION CORE
- RESIDENT'S CLUBHOUSE
- LANDSCAPE AREA - LAWN
- HARD-PAVED AREA
- E&M
- RESIDENTIAL
- SHRUB

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 Proposed Scheme - 3F Plan
 30-07-2024 (Indicative only)
 1:600 (A3)

