

Our Ref. HD(P) 8/3/IS27

Tel No. 2761 5301
Fax No. 2761 5870

Your Ref.

Date: 14th June 2024
By Email

Secretary, Town Planning Board
15/F, North Point Government Offices,
333 Java Road, North Point
Hong Kong

Dear Sir/Madam,

**Section 16 Planning Application for Proposed Minor Relaxation of Restrictions of
Plot Ratio and Building Height for the Public Housing Developments at
Tung Chung Areas 133A, 133B and 133C
(Application no. A/I-TCE/4)**

Reference is made to the captioned Section 16 application received by the Town Planning Board on 26.4.2024 and the comments received from Planning Department dated 27.5.2024, 29.5.2024, 7.6.2024 and 11.6.2024. We submit herewith the table summarizing the responses to comments. Refined figures for the Visual Impact Assessment report, which involve no change to the photomontages, and only relate to newly added annotations to provide clarifications, are also attached.

Should you have any queries or need further information, please contact me at 2761 5310. Thank you for your attention.

Yours faithfully,



(Alan LAU)

for Director of Housing

Encl.

S.16 Application No. A/I-TCE/4

**Proposed Minor Relaxation of Restrictions of Plot Ratio and Building Height for the
Public Housing Developments at Tung Chung Areas 133A, 133B and 133C**

Response to Comments

	Comments	Housing Department's Response
1.	<u>Planning Department (Sai Kung & Islands District Planning Office)</u> (7 & 11.6.2024)	
	<p>Please provide the following supplementary info for our processing.</p> <p>Annotation on photomontages of VIA – please add (i) BHR under OZP to baseline scheme; and (ii) BH of proposed scheme; (iii) proposed level of BH relaxation;</p> <p>Definition and Function of Dedicated Pedestrian Zone (DPZ) and Justifications for including “O” zone (i.e. the DPZ”) into the development; and</p> <p>The GFA allocated for Social Welfare Facilities in (i) each of the Sites; and (ii) % of domestic GFA allocated for SWFs in the three Sites in total;</p>	<p>Relevant photomontages amended and attached.</p> <p>The DPZ is a 6.5m wide zone serves as an Emergency Vehicular Access (EVA) and pedestrian path, thus releasing more area for integrated open space and greening. The proposed DPZ does not count toward the plot ratio and local open space within the public housing developments. The DPZ is also accessible to public and could have function of open space.</p> <p>As agreed with SWD, about 5% of domestic GFA for each TC 133B and TC 133C would be allocated for Social Welfare Facilities (ie. TC133B approximately 5,800 sqm and TC133C 6,100 sqm) and no Social Welfare Facilities at TC 133A. The currently proposed Social Welfare Facilities would make up to about 2.3% of total domestic GFA of TC 133A, B & C three sites.</p>

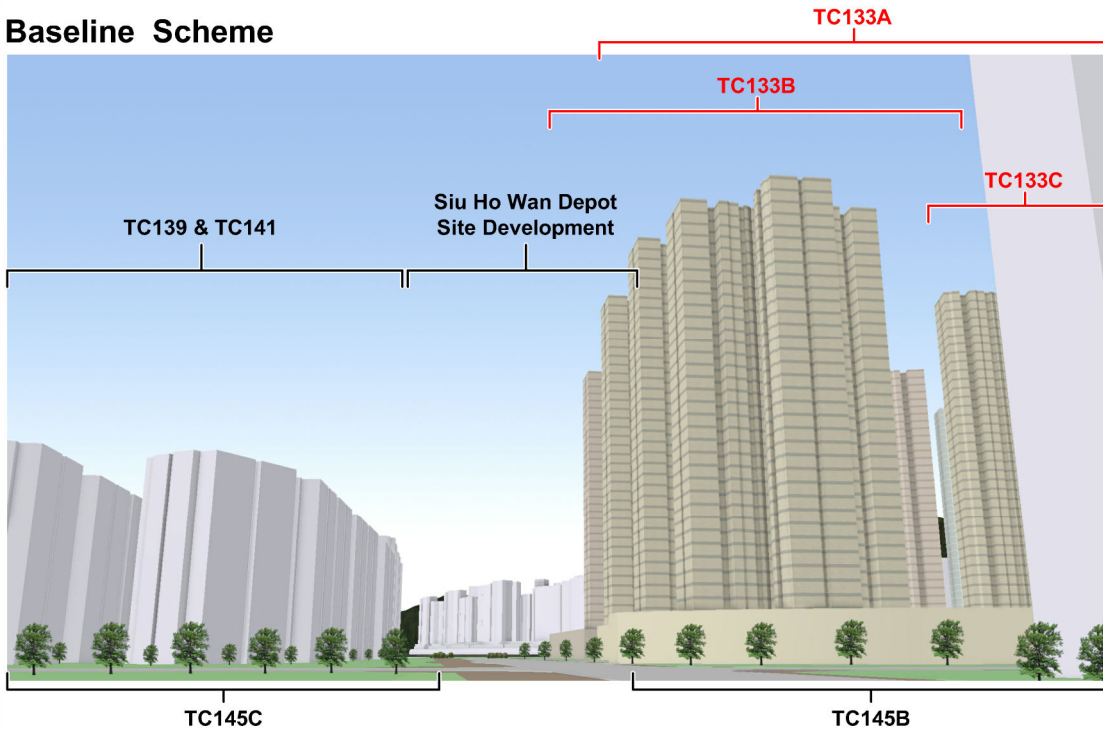
	Comments	Housing Department's Response
2.	<p><u>Public Comment (from Ms. Marry Mulvihill) (24.5.2024)</u></p> <p><u>About Flat size / average household size</u></p> <p>Why the large divergence between the flat production and design population for TC 133A and C while TC 133B is relatively in harmony with around 20% increase in both areas? The different in TC 133A is alarming, 50% increase in production with only 18% in population. So is the plan to reduce the size of the units, to provide more nano flats? This is contrary to public expectations and pledges that the quality and size of housing will improve not diminish.</p> <p><u>About the Open Space</u></p> <p>Then the Open Space. It is incredible that the paper state that there will be 1 sqm. OS per resident with no increase in footprint and with all the OS facilities on one level. By adding additional units the quality of the OS is further compromised and it appears impossible to provide the quantity stated. In addition, the OS is not open, much of it is covered. For TC 133B it is practically all covered and surrounded by high walls. It is obvious that there will be poor ventilation, and little or no penetration of sunlight. The community services will also suffer from poor ventilation and lack of natural light, most alarming as some of these facilities will cater to the elderly, disabled and young children.</p> <p><u>About design of blocks</u></p> <p>The design of some of the blocks is alarming. A significant portion of the towers will have no support. But Tung Chung is a waterside</p>	<p>Please note that an average household size assumption of 3.06 was adopted for the baseline scheme; while the population of current scheme are based on the individual household size of the proposed flat mix or average household size of 2.7, as remarked in table 2-4 in the planning statement.</p> <p>HA has been adopting Modular Flat Design (MFD) in public housing development. There are currently four types of modular flat design: Type A flat (1-2 person), Type B flat (2-3 person), Type C flat (3-4 person) and Type D flat (4-5 person).</p> <p>The current provision of open space is not less than 1 sqm per person which fulfilled the requirement of The Hong Kong Planning Standards and Guidelines. Cross ventilation is provided in passive recreation facilities under cover. The design and provision of community facilities will observe relevant requirements and guidelines.</p> <p>The AVA submitted has demonstrated that there is no adverse impact on air ventilation.</p> <p>The structural design will be complied with relevant statutory requirements.</p>

	Comments	Housing Department's Response
	<p>location, the land is reclaimed. In view of the predictions of ferocious storms in coming decades, is the design even safe? Reclaimed land is highly susceptible to soil liquefaction and other issues.</p> <p><u>About visual impact</u></p> <p>The additional height completely overturns design principles PlanD has trotted out for years, that there be descending levels of height towards the waterfront. These developments are the reverse. They create a significant wall effect both along the waterfront and for those homeowners unlucky enough to have invested in homes behind the sites.</p>	<p>VIA and AVA have been conducted, which demonstrated that there would be no adverse impact to the surrounding from the proposed developments with appropriate design. Besides, the proposed BH fits into the descending building height profile toward the waterfront in TCNTE Area.</p>
3.	<u>Public Comment (from MTRC) (24.5.2024)</u>	
	<p>The Corporation has, in general, no objection to the captioned Section 16 application (Application No. A/I-TCE/4) for a proposed minor relaxation of plot ratio and building height restrictions for the permitted public housing development in Government Land at Areas 133A, 113B and 133C in Tung Chung. As the proposed developments are situated close to the MTR Tung Chung Line (TCL) and the Airport Express (AEL), noise from train operations could have a potential impact on any future occupants.</p> <p>We note from the Environmental Assessment Reports that the design schemes of Areas 133A and 133 C has been changed or refined as compared with the approved Environmental Impact Assessment (EIA) Report for Tung Chung Line Extension (AEIAR-235/2022) (approved EIA). Also, due to the proposed relaxation of the GFA and building height at the application sites, there</p>	<p>We note that MTRC has no objection to our Section 16 application.</p> <p>We note that MTRC has conducted a detailed railway noise impact assessment which covers the proposed residential developments at Tung Chung Area 133A and 133C in their EIA Report for Tung Chung Line Extension (AEIAR-235/2022) (“approved MTRC’s TCLE EIA report”) approved by EPD in 2022. Compared to the building layout plans adopted in the approved MTRC’s TCLE EIA report, the</p>

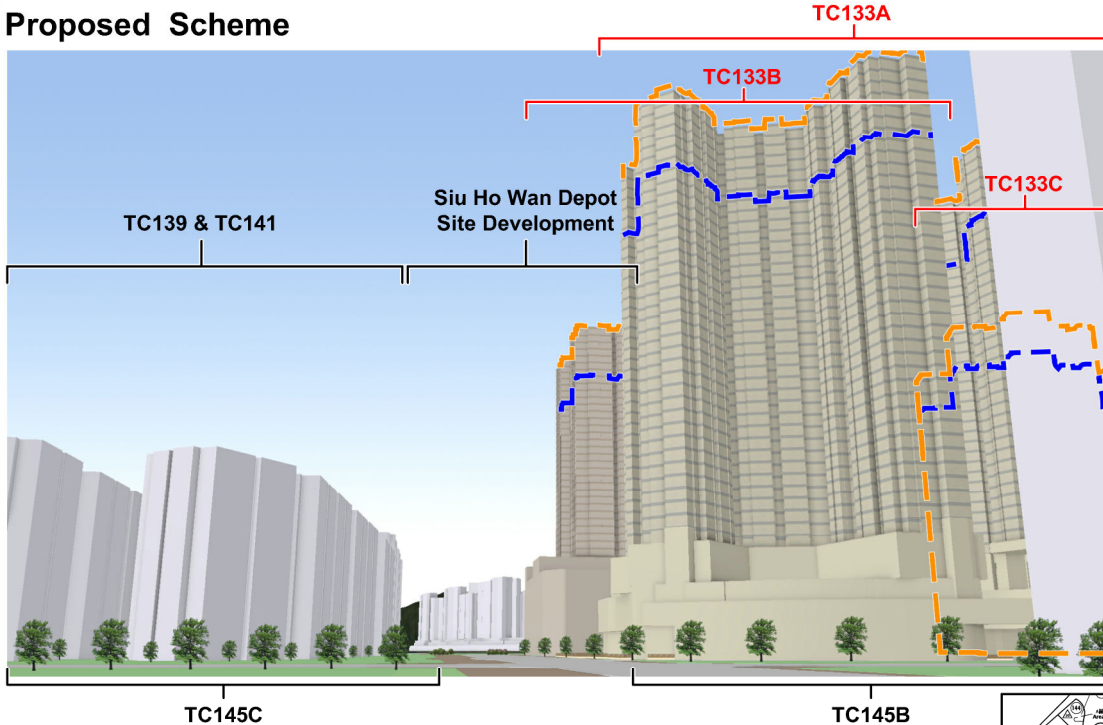
Comments	Housing Department's Response
<p>would be a greater number of occupants who are expected to have potential impact by train noise. The predicted noise levels at the noise sensitive receivers were just evaluated qualitatively by making reference to the results in the approved EIA report, and no detailed noise assessment was carried out based on the revised schemes. In order to have a more comprehensive and accurate estimate of the railway noise impact, we recommend the applicant's consultant to conduct a detailed quantitative noise review based on the latest building layouts of the proposed developments.</p> <p>We have also noticed from the Environmental Assessment Reports that key mitigation measure of railway noise impact is the noise screen structures of the high-rise residential / commercial development and G/IC development at Areas 113, 129, 130, 131, 132, 136 and 137. It is recommended that, should a programme mismatch occur between the implementation of these developments with noise screening structures and occupation of the residential sites at Area 133A and 133C, supplementary noise reviews shall be conducted by the applicant's consultant for the</p>	<p>two residential blocks originally planned at the southwestern corner of Area 133A are now excluded in our revised scheme submitted under this Section 16 application as that portion of the site is now reserved for a public wet market. Other proposed residential blocks in Areas 133A and 133C in our revised scheme have similar setback distance and either smaller or same view angles to the railway compared to the original scheme adopted in the approved MTRC's TCLE EIA.</p> <p>As our revised scheme is optimized with respect to the rail noise impacts compared to the original scheme adopted in the approved MTRC's TCLE EIA report, the "qualitative" rail noise review in our Environment Assessment Study (EAS) Reports by making reference to the findings of the approved MTRC's TCLE EIA can adequately justify the railway noise compliance for the revised scheme for both Areas 133A and 133C and our EAS reports have been approved by EPD. It is considered that the detailed "quantitative" rail noise review suggested by MTRC is not required.</p> <p>It is noted that the Government has conducted an environmental review to confirm the predicted railway noise level and the road traffic noise level of Area 133 will comply with the criteria and considered acceptable under the interim arrangement without the concerned noise screening buildings. EPD has no comments to the Government's environmental review report and placed it in EIAO Ordinance Registry for access by the public.</p> <p>As the Government's environmental review report has concluded no potential rail noise impact on Area 133 under the interim</p>

	Comments	Housing Department's Response
	<p>concerned residential sites. Besides, to cater for the contingency that the noise screening structures are finally built shorter than those assumed in the noise assessment/approved EIA, given some of the flats may have a direct line-of-sight towards the rail lines in such case, we suggest that the applicants' consultant shall conduct supplementary noise assessment, to be reviewed and approved by the Environmental Protection Department, and implement necessary noise mitigation measures to ensure full compliance with statutory requirements.</p> <p>Should approval be granted to the Section 16 Planning Application, we urge the Town Planning Board gives due consideration to our concerns and impose related development requirements through planning approval conditions.</p>	<p>arrangement without the concerned noise screening buildings, it is considered that the supplementary noise assessment suggested by MTRC is not required.</p> <p>As MTRC's concerns mentioned in Items 2 and 3 above have been properly addressed under our EAS reports and the Government's environmental review reports approved by EPD, it is not necessary to impose development requirements through planning approval conditions.</p>

Baseline Scheme

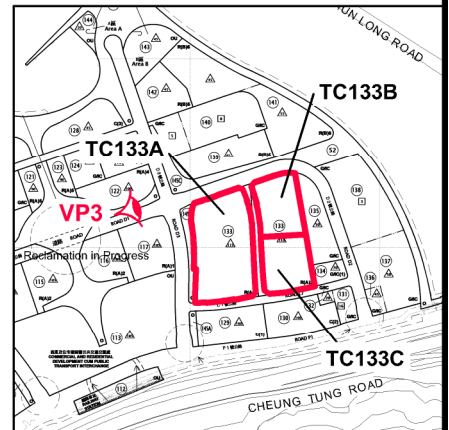


Proposed Scheme



LEGEND:

-  TC133A
-  TC133B
-  TC133C
-  Maximum Building Height Restriction Under OZP at 115mPD for TC133A and 110mPD for 133B & 133C
-  Proposed Maximum Building Height Restriction at 135mPD for TC133A, 130mPD for 133B and 125mPD for 133C



**PHOTOMONTAGE AT VIEWPOINT 3
(VIEW FROM THE PLANNED CENTRAL GREEN
AT TUNG CHUNG AREA 118)**

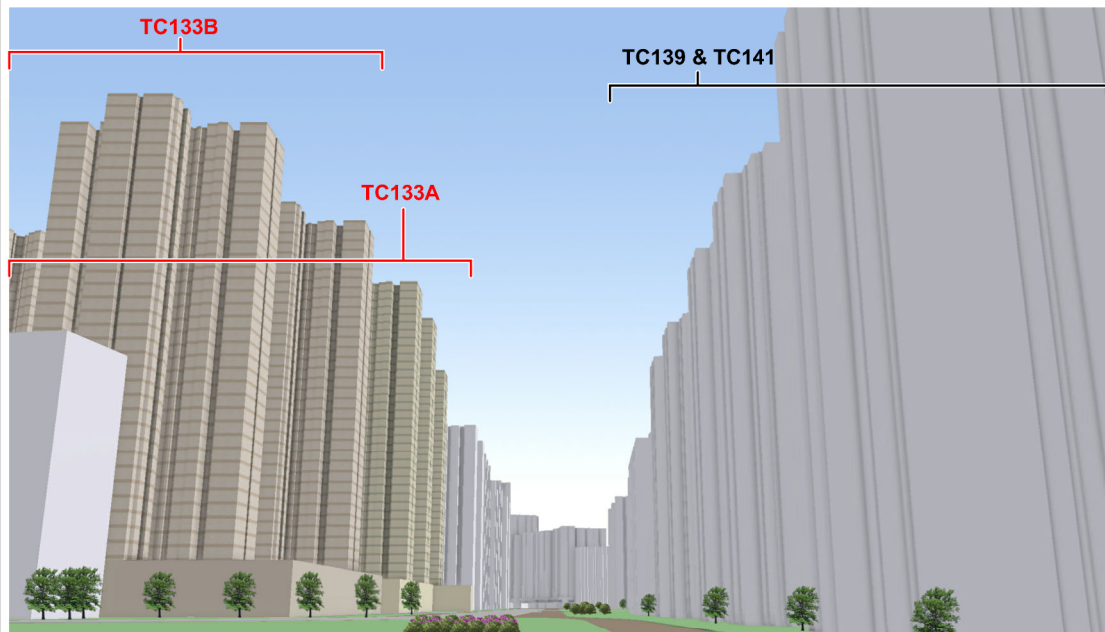


**HOUSING DEPARTMENT
PLANNING SECTIONS**

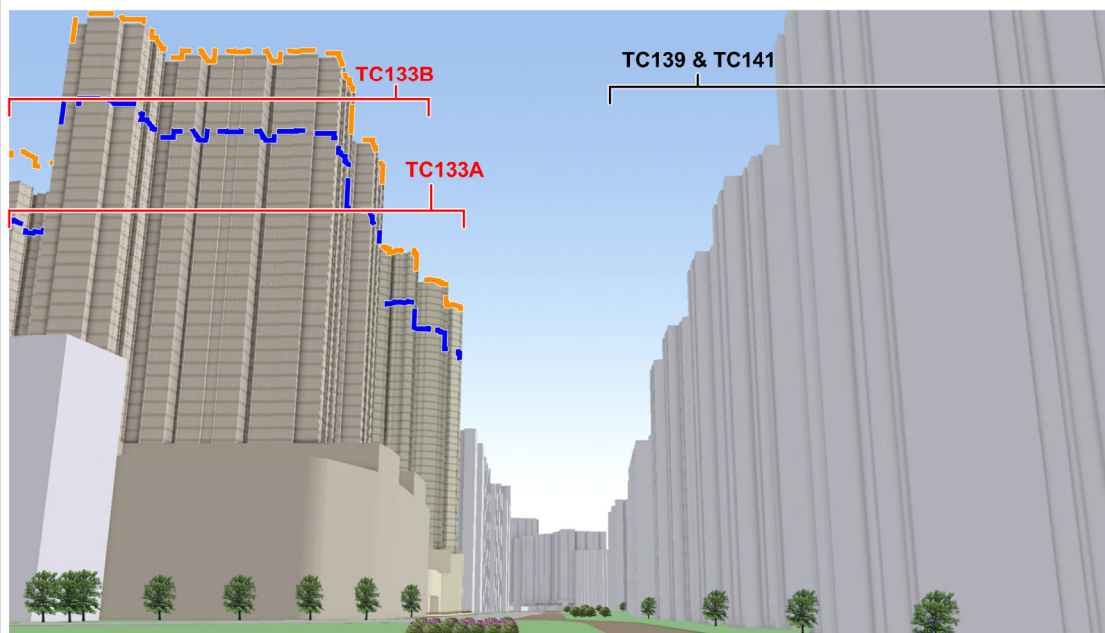
Figure 6

**DATE :
12. 6. 2024**

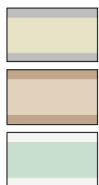
Baseline Scheme



Proposed Scheme



LEGEND:



TC133A

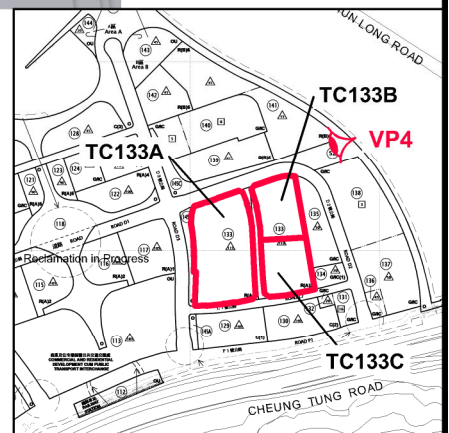
TC133B

TC133C



Maximum Building Height Restriction Under OZP at 115mPD for TC133A and 110mPD for 133B & 133C

Proposed Maximum Building Height Restriction at 135mPD for TC133A, 130mPD for 133B and 125mPD for 133C



**PHOTOMONTAGE AT VIEWPOINT 4
(VIEW FROM THE PLANNED CIVIC WATERFRONT
PARK AT TUNG CHUNG AREA 52)**

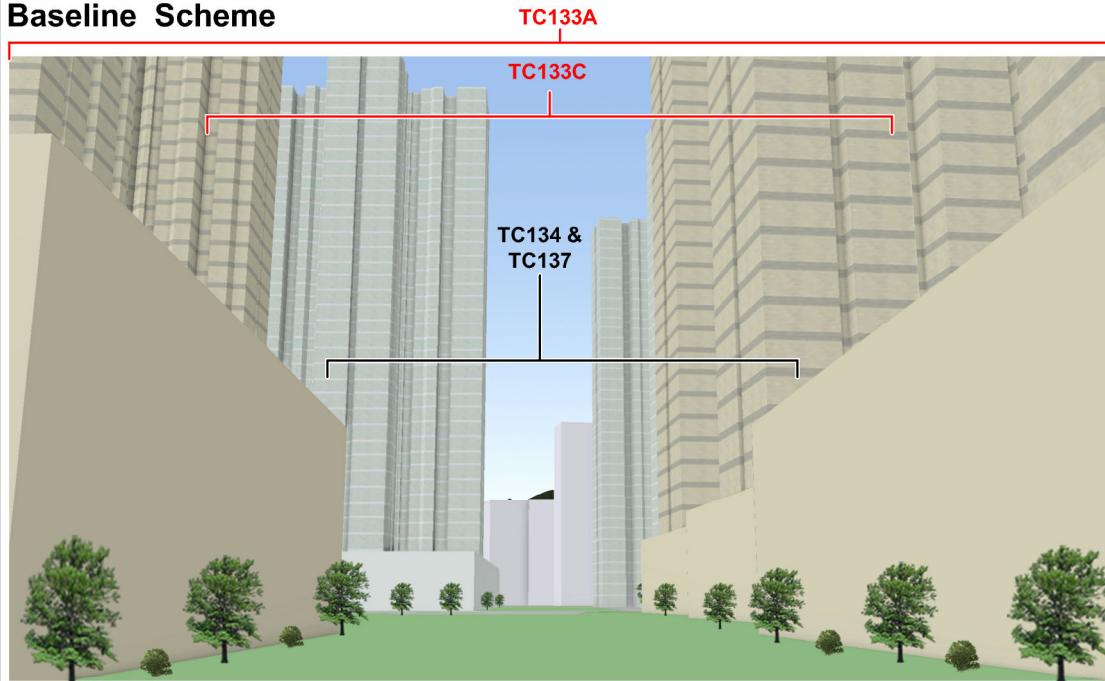


**HOUSING DEPARTMENT
PLANNING SECTIONS**

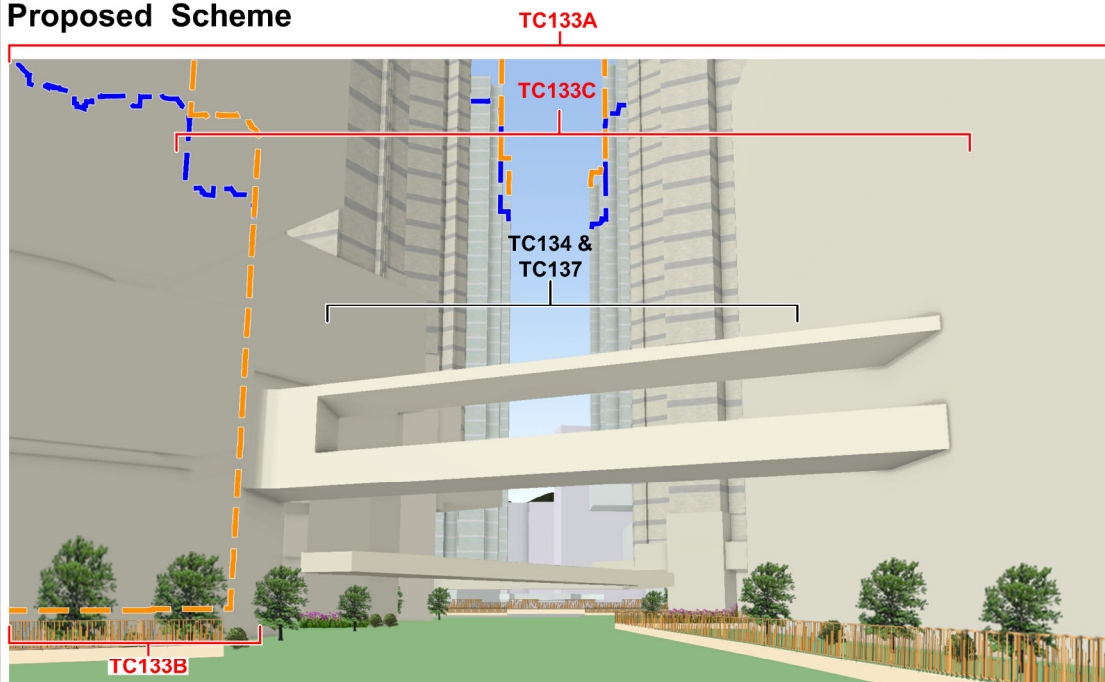
Figure 7

**DATE :
12. 6. 2024**

Baseline Scheme



Proposed Scheme



LEGEND:



TC133A

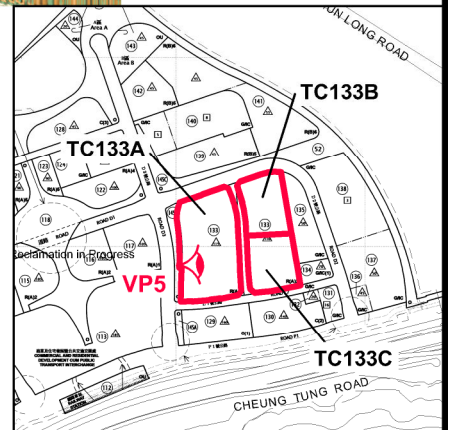
TC133B

TC133C



Maximum Building Height Restriction Under OZP at 115mPD for TC133A and 110mPD for 133B & 133C

Proposed Maximum Building Height Restriction at 135mPD for TC133A, 130mPD for 133B and 125mPD for 133C



**PHOTOMONTAGE AT VIEWPOINT 5
(VIEW FROM THE PLANNED
N-S LINEAR PARK AT AREA 145B)**



**HOUSING DEPARTMENT
PLANNING SECTIONS**

Figure 8

**DATE :
12. 6. 2024**