

Section 16 Planning Application

**Proposed Development of
Hong Kong Sheng Kung Hui St. Christopher's Complex
at Remaining Portion of Taxlord Lot No. T77 in DD 34, Tai Po**

**Proposed Minor Relaxation of Building Height Restriction
for Permitted Social Welfare Facility**

Planning Statement

December 2024

EXECUTIVE SUMMARY

- S1. This Section 16 (s.16) planning application seeks planning permission from the Town Planning Board (TPB) for proposed minor relaxation of building height restriction (BHR) for permitted social welfare facilities at Tai Po Road – Tai Po Kau section (the Site). The Site falls within an area zoned “Government, Institution or Community” on the Approved Tai Po Outline Zoning Plan No. S/TP/30 (the OZP), where ‘Social Welfare Facility’ is a Column 1 use and is always permitted. The Site is subject to a building height restriction of 8-storey under the OZP. This application seeks permission for minor relaxation of the BHR to 10-storey so that the development can maximize its use of land in providing a range of permitted social welfare facilities.
- S2. The proposed development aligns with various Government policies, such as the “Special Scheme on Privately Owned Sites for Welfare Uses” and “Single Site, Multiple Uses” policies, in addressing the pressing demand for social welfare facilities, especially the caring facilities for the elderly and the supporting facilities for children in need.
- S3. The Applicant intends to develop a social welfare complex that accommodates a wide range of facilities. The proposed development is considered compatible to the surrounding environment and is technically feasible. It will provide significant benefits to the community, and help address the demand for social welfare facilities, especially Residential Care Home for the Elderly and Small Group Homes.
- S4. The proposed development is an outcome of careful consideration and assessments, and is a balanced design having addressed various site constraints and operational requirements. In view of the above, the TPB is invited to give favorable consideration on the proposed minor relaxation of maximum BHR at the Site.

行政摘要

(聲明：此中文譯本僅供參考，如中文譯本和英文原文有差異時，應以英文原文為準。)

- S1. 本第 16 條規劃申請是向城市規劃委員會（下稱「城規會」）申請略為放寬位於大埔道大埔滘段的建築物高度限制，以作准許的社會福利設施用途。申請地點位於《大埔分區計劃大綱核准圖編號 S/TP/30》上的「政府、機構或社區」地帶，當中「社會福利設施」屬於第一欄經常准許的用途。該地帶的建築物高度限制為八層。本申請希望可以將建築物高度限制略為放寬至十層，以善用申請地點提供多元化的准許社會福利設施。
- S2. 擬議的發展配合政府的政策，包括「私人土地作福利用途特別計劃」及「一地多用」的兩項政策，以助解決公眾對社福設施（特別是給有需要的長者及幼兒的照顧服務）的迫切需求。
- S3. 申請人有意發展一幢綜合社區服務大樓，提供多項社會福利設施。大樓設計與毗鄰環境相融，並在技術上可行。大樓的落成可為社區帶來裨益，並有助緩解社區對護理安老院及兒童之家的需求。
- S4. 擬議方案經仔細考量及評估，平衡了各項考慮因素，當中包括場地限制和運營要求。基於以上各點，懇請城規會從優考慮略為放寬申請地盤的最高建築物高度限制。

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Appendix 7: Sewerage Impact Assessment

Appendix 8: Setback Diagram

Consultants

Ho Wang SPB Limited	- <i>Traffic Engineer</i>
JMK Consulting Engineers Limited	- <i>Structural, Civil and Geotechnical Engineer</i>
LWK & Partners (HK) Limited	- <i>Lead Consultant & Architect</i>
Masterplan Limited	- <i>Planning Consultant</i>
Otherland Limited	- <i>Landscape Architect</i>
Urban Green Consultants Limited	- <i>Environmental Consultant</i>
WSP Hong Kong Limited	- <i>Building Services Engineer</i>

1. Introduction

- 1.1. This Section 16 (s.16) planning application is submitted on behalf of Hong Kong Sheng Kung Hui Welfare Council Limited (HKSKHWCL) (the Applicant) to seek planning permission from the Town Planning Board (TPB) for minor relaxation of building height restriction (BHR) for permitted social welfare facilities at the Remaining Portion of Taxlord Lot No. T77 in DD 34, Tai Po (the Site).
- 1.2. The Site falls within an area zoned "Government, Institution or Community" ("G/IC") on the Approved Tai Po Outline Zoning Plan No. S/TP/30 (the OZP), where 'Social Welfare Facility' is a Column 1 use and is always permitted. The Site is subject to a maximum building height restriction (BHR) of 8-storey under the OZP. Minor relaxation of BHR may be considered by the TPB on application under s.16 of the Town Planning Ordinance based on the individual merits of the development proposal.
- 1.3. The Applicant intends to develop a 10-storey social welfare complex, accommodating a range of facilities at the Site, the scope of which is agreed by the Social Welfare Department (SWD). The proposed development is to be named as Hong Kong Sheng Kung Hui St. Christopher's Complex (the SC Complex). This application requests for minor relaxation of BHR from 8 to 10-storeys so that the development can maximize its use in accommodating the permitted social welfare facilities.

2. Background

2.1. The Site

- 2.1.1. The Site is situated on a hillside of a long sloping terrain which stretches from the Tolo Highway to +400mPD uphill. The Site is located at Tai Po Road - Tai Po Kau Section. A rural road is located to the southeast across a piece of vacant government land connecting a low-density residential development at Deerhill Bay to Tai Po Road - Tai Po Kau Section. **Figures 1 and 2** below and **Appendix 1** show the location of the Site.
- 2.1.2. The Site is currently a hummock covered with vegetation with no building structures (**Figure 4**). It is generally rectangular in shape with an area of about 2,191.3m² and is at an elevation of about +78mPD to about +86mPD.

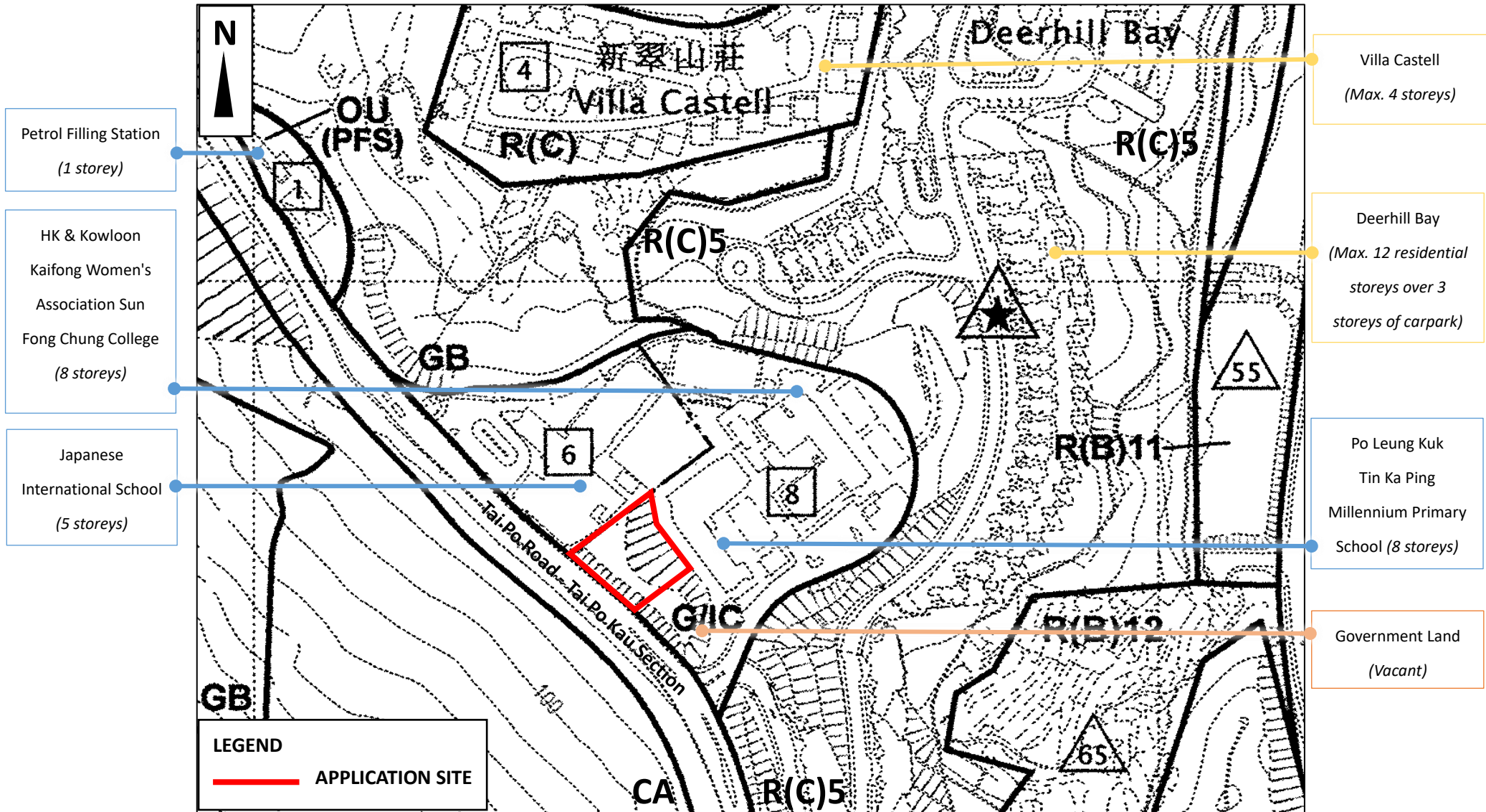


Figure 1: The Site and its neighbourhood shown on the Approved Tai Po Outline Zoning Plan No. S/TP/30 and surrounding building height profile

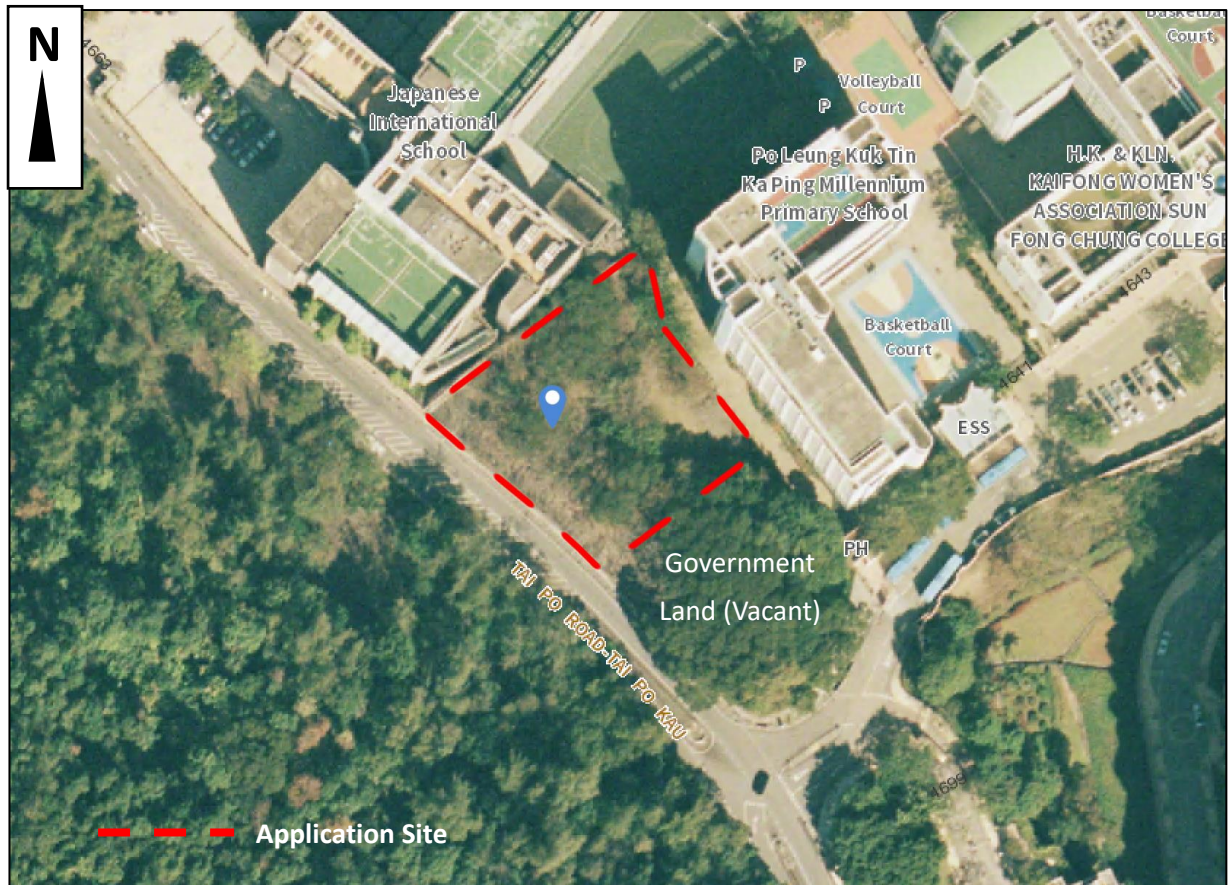


Figure 2: Satellite image of the Application Site and its surroundings (image from GEOINFO MAP, The Government of Hong Kong SAR)

2.2. The Neighbourhood

2.2.1. The surrounding of the Site is characterised by various land uses (**Figure 1**), mainly with “G/IC” in the immediate vicinity. To its north and northeast of the Site are three schools within the “G/IC” zone, namely Japanese International School (JIS) with a BHR of 6-storey; Po Leung Kuk Tin Ka Ping Millennium Primary School (PLKTKPM Primary School) with BHR of 8-storey and Hong Kong & Kowloon Kaifong Women's Association Sun Fong Chung College (SFCC) with BHR of 8-storey under the OZP. To the southeast across a piece of vacant government land is the Deerhill Bay development within an area zoned “Residential (Group C)5” (“R(C)5”) zone with BHR of 12 residential storeys over 3 storeys of car park under the OZP. The existing conditions of the key developments in the vicinity are in **Figure 3** below.

2.2.2. The immediate surroundings of the Site have low building height profile of not more than 12 storeys, which are dominated by low-rise residential development and schools (**Figures 1, 3** and **4** refer). Relaxation of BHR for a development to 10 storeys is not out of context in terms of building height profile of the surrounding area.

	
<p>Po Leung Kuk Tin Ka Ping Millennium Primary School (PLKTKPM Primary School): About +106.3mPD (8-storey)</p>	<p>DeerHill Bay: About +106.5 to +112.8mPD (12-storey over 3-storey of carpark)</p>
	
<p>Japanese International School (JIS): About +99.2mPD (5-storey)</p>	<p>Petrol filling station adjacent to JIS (1-storey)</p>

Figure 3: Key developments in the vicinity of the Site and their characteristics

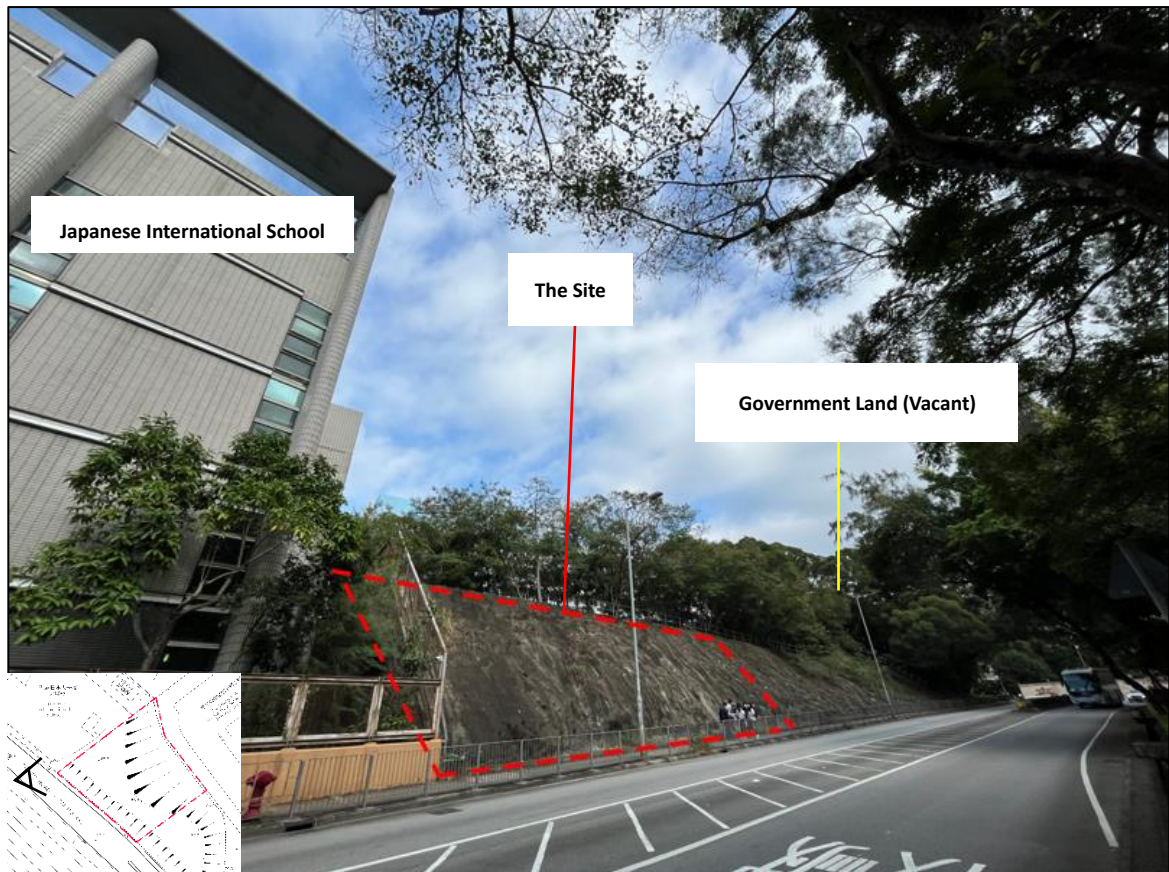


Figure 4: Adjacent Government Land and the Site together is a hummock covered with trees

2.3. Site Constraints

2.3.1. The design of the proposed development has considered a number of site constraints. They include the existing uneven terrain within the site, traffic noise and emission from Tai Po Road - Tai Po Kau Section, as well as the relationship of the proposed SC Complex with the adjacent school blocks that are built closely to the Site's boundary (**Figure 5**). The design would also have to strike a balance between providing enough floor space to accommodate the necessary functions while keeping outdoor area as much as possible for enjoyment of the residents, as well as fulfill various government regulation and requirements, and to address the site constraints mentioned. The relevant design considerations are detailed in **section 7 and paragraph 8.6.2** below.

Technical Feasibility Study (TFS) and capital costs of the project.

3.1.2. The proposed SC Complex is one of the project proposals under Special Sites Scheme. HKSKHWCL had reached an agreement with SWD on the service scope and floor area requirements of the project and had received funding support from the Lotteries Fund. The funding received had helped the Applicant formulate and submit a TFS to SWD.

3.2. **Shortage of Residential Child Care Services (RCCS) and Small Group Homes (SGHs)**

3.2.1. It is evident that there is a clear demand of more RCCS especially SGHs. In 2022-2023, the average occupancy rate for ordinary service of SGH is 93%¹. 388 number of children are recorded at waitlist on average each month, the highest amongst RCCS and related services. In the Committee on Review of Residential Child Care and Related Services chaired by the Director of Social Welfare (2022), SWD is recommended to identify suitable sites for setting up new RCCs or SGHs through various channels such as development and re-development projects, so as to provide children under the age of 6 with family-based care and a secure environment for growing up and meeting the service demand².

3.3. **Shortage of Residential Care Services for the Elderly**

3.3.1. Given Hong Kong's ageing population and the longer average life expectancy, the residential care service ("RCS") places for the elderly have been in acute demand. As at 31 March 2023, there are about 16 800 elderly persons waitlisted for subsidized RCS³. In light of the pressing demand, the Government is taking a multi-pronged approach to increase residential care places for the elderly. This includes the "Special Site Scheme" which the proposed development is a part of. In the proposed development, the places of the Residential Care Home for the Elderly will be available for eligible people on the SWD waiting list or through application to the operator.

3.4. **Policy of "Single Site, Multiple Uses" (SSMU)**

3.4.1. Inadequate land within the territory for development has been a challenge of the Government for decades. The Chief Executive's (2018) Policy Address states that shortage of land supply not only leads to a shortage of housing supply, but also affects people's quality of life. The impact covers "*from child care centres to elderly care facilities; from basic education and healthcare services to leisure open space...*". The Policy Address proposes SSMU policy to better utilise valuable land resource and increase the yield of development land. This proposal is in line with

¹https://www.legco.gov.hk/yr2024/english/panels/ws/ws_mcpa/papers/ws_mcpa20230122cb2-25-4-e.pdf

²https://www.legco.gov.hk/yr2024/english/panels/ws/ws_mcpa/papers/ws_mcpa20230122cb2-25-4-e.pdf

³ <https://www.legco.gov.hk/yr2023/english/panels/ws/papers/ws20230612cb2-535-5-e.pdf>

the Government policy of increasing social welfare facilities and better utilization of land resources, where technical feasibility permits.

4. Planning Context

4.1. Statutory Planning Context

4.1.1. The Site falls within an area zoned "G/IC" on the OZP. The proposed development is for 'Social Welfare Facility' use, which is listed as a Column 1 use under the OZP and is always permitted (details of the proposed facilities is in **Section 6** below). The proposed development is in line with the planning intention of "G/IC" zone, which is primarily for the provision of government, institution or community facilities serving the needs of the local residents and/or a wider area.

4.1.2. Under the OZP, the Site has a BHR of 8-storey and any basement floor(s) may be disregarded in determining the maximum number of storeys for BHR. There is neither GFA nor plot ratio restrictions imposed on the Site. According to the Notes of the OZP, minor relaxation of BHR may be considered by the TPB on application under s.16 of the Town Planning Ordinance based on the individual merits of the development proposal. As such, a s.16 planning application is required to apply for minor relaxation of the BHR for the proposed 10-storey development.

4.1.3. According to the Explanatory Statement of the OZP, to provide incentive for developments/redevelopments with design merits/planning gains, each application for minor relaxation of BHR under section 16 of the Ordinance will be considered on its own merits and the relevant criteria for consideration of such relaxation are as follows:

- a) amalgamating smaller sites for achieving better urban design and local area improvement;
- b) accommodating the bonus plot ratio granted under the Buildings Ordinance in relation to surrender/dedication of land/area for use as a public passage/street widening;
- c) providing better streetscape/good quality street level public urban space;
- d) providing separation between buildings to enhance air and visual permeability;
- e) accommodating building design to address specific site constraints in achieving the permissible plot ratio under the OZP; and
- f) other factors such as need for tree preservation, innovative building design and planning merits that would bring about improvements to townscape and amenity of the locality and would not cause adverse landscape and visual impacts.

4.1.4. The proposed development is in line with consideration of relaxation of BHR under Explanatory

Statement of the OZP, in particular it fulfills criteria (c) where the landscape treatment is proposed on G/F (at a level meeting the adjoining Tai Po Road (details in **paragraphs 6.2.2 and 8.5.3** below)) to create visual interest and an improved walking environment along Tai Po Road, and criteria (e) where the proposed SC Complex has been designed to address various site constraints mentioned in **paragraph 2.3** above, while achieving its maximum development potential.

4.2. Previous Application

4.2.1. There are no previous planning applications submitted at the Site.

5. Land Matters

5.1 The Site is an agricultural lot which falls within the Remaining Portion of Taxlot Lot No. T77 in D.D.34 (RP T77 DD 34), which is held under Block Government Lease. The lease term is to be expired on 30.6.2047. The registered owner is "The Bishop of Victoria Hong Kong" ("The Hong Kong Sheng Kung Hui Foundation" is formerly known as "The Bishop of Victoria Hong Kong").

5.2 The lot is an agricultural lot and no building can be erected without the prior approval from Lands Department (LandsD). Based on the proposed development, a lease modification application will need to be submitted to LandsD.

6. Development Proposal

6.1. Proposed Facilities at the Site

6.1.1. The proposed building will accommodate the following services: -

- a) Special Child Care Centre (SCCC, 100 subvented places)
- b) Residential Care Home for the Elderly (CoC Home, 240 subvented places and 49 self-financing places)
- c) Small Group Home (SGH, 30 subvented places, 4 flats)
- d) Foster Care Services and Agency-based Enhancement of Professional Staff Support Services (FSC & ABPSS, subvented)
- e) Child Care Centre (CCC, 65 aided places)
- f) Staff Training Unit (STU, self-financed)

6.1.2. The proposed development comprises of one 10-storey block including 2 storeys of podium, over

two levels of basement. The development accommodates mainly training rooms, activity rooms and residential homes for children and elderly persons. A vehicular access is proposed at Tai Po Road-Tai Po. The target completion year of the proposed development is March 2030. The development would be carried out in one phase. The development parameters and accommodation of floors of the proposed SC Complex are in **Tables 1 and 2** below respectively.

Table 1: Development Parameters of the Proposed St Christopher's Complex

Development Parameters	Details
Site Area	2,191.3 m ² (about)
Mean Site Formation level	+79.2mPD (about)
Building Height <ul style="list-style-type: none"> • No. of Storeys • Meters from mean site formation level • mPD 	10 (excluding two levels of basement) 36m (about) +115 mPD (about) (main roof level)
Site Coverage	not exceeding 42% (above 15m) not exceeding 85% (15m or below)
Total GFA <ul style="list-style-type: none"> • SCC • CoC • SGH • FCS & ABPSS • CCC • STU • Area for common connection, vehicular circulation, car park and back of house facilities (E&M and sewage treatment plant) 	12,521.1 m ² (about) 968.4 m ² (about) 4,769.8 m ² (about) 941.2 m ² (about) 94.7 m ² (about) 549.5 m ² (about) 194 m ² (about) 5,003.5 m ² (about)
Plot Ratio	5.7 (about)
No. of parking spaces <ul style="list-style-type: none"> • Private Car • Light Bus • Light Goods Vehicle (LGV) • Coach Space • Motorcycle 	7* 2 1 2 2
No. of Bay / Layby <ul style="list-style-type: none"> • Ambulance Bay • Private Car Layby 	1 1

Development Parameters	Details
<ul style="list-style-type: none"> Heavy Goods Vehicle (HGV) L/UL Bay 	1
Open Space	Not less than 325 m ² **

*Include. 1 accessible parking space

** Base on the calculation of 1m²/person for an intended population of 325 at the proposed development.

Table 2: Accommodation of Floors of the proposed St Christopher's Complex

Floors	Uses*
Roof	E&M
8/F and 9/F	SGH and Landscaped Area
7/F	<ul style="list-style-type: none"> STU and FSC & ABPSS Supporting facilities of CoC Home (including staff office, staff toilet/bathroom, general store) Landscaped Area
3/F – 6/F**	CoC Home
2/F	<ul style="list-style-type: none"> CoC Home Landscaped Area
1/F	<ul style="list-style-type: none"> CoC Home, SCCC and CCC Landscaped Area
G/F	<ul style="list-style-type: none"> CoC Home, SCCC and CCC Ambulance bay, HGV L/UL space, coach parking space, and private car layby Landscaped Area
Basement (B1/F – B2/F)***	<ul style="list-style-type: none"> Carpark and Sewage Treatment Plant (STP) Supporting facilities of CoC Home, SCCC and CCC

*Ancillary back of house services (including plantrooms and E&M) are not shown in the table from basement level to 9/F.

**Floor level of 6/F is at about 23.1m above ground (i.e. less than 24m above ground), fulfilling requirements in paragraph 7.2 below.

*** B2/F is a partial floor accommodating sewage treatment plant only.

6.1.3. Master Layout Plan, Layout Plans of CoC Home on 2/F and SGH on 8/F, and a Section are shown in **Figures 6 to 9** below. The full set of architectural drawings is in **Appendix 1**.



Figure 6: Master Layout Plan



Figure 7: 2/F Plan



Figure 8: 8/F - Layout Plan of Small Group Home

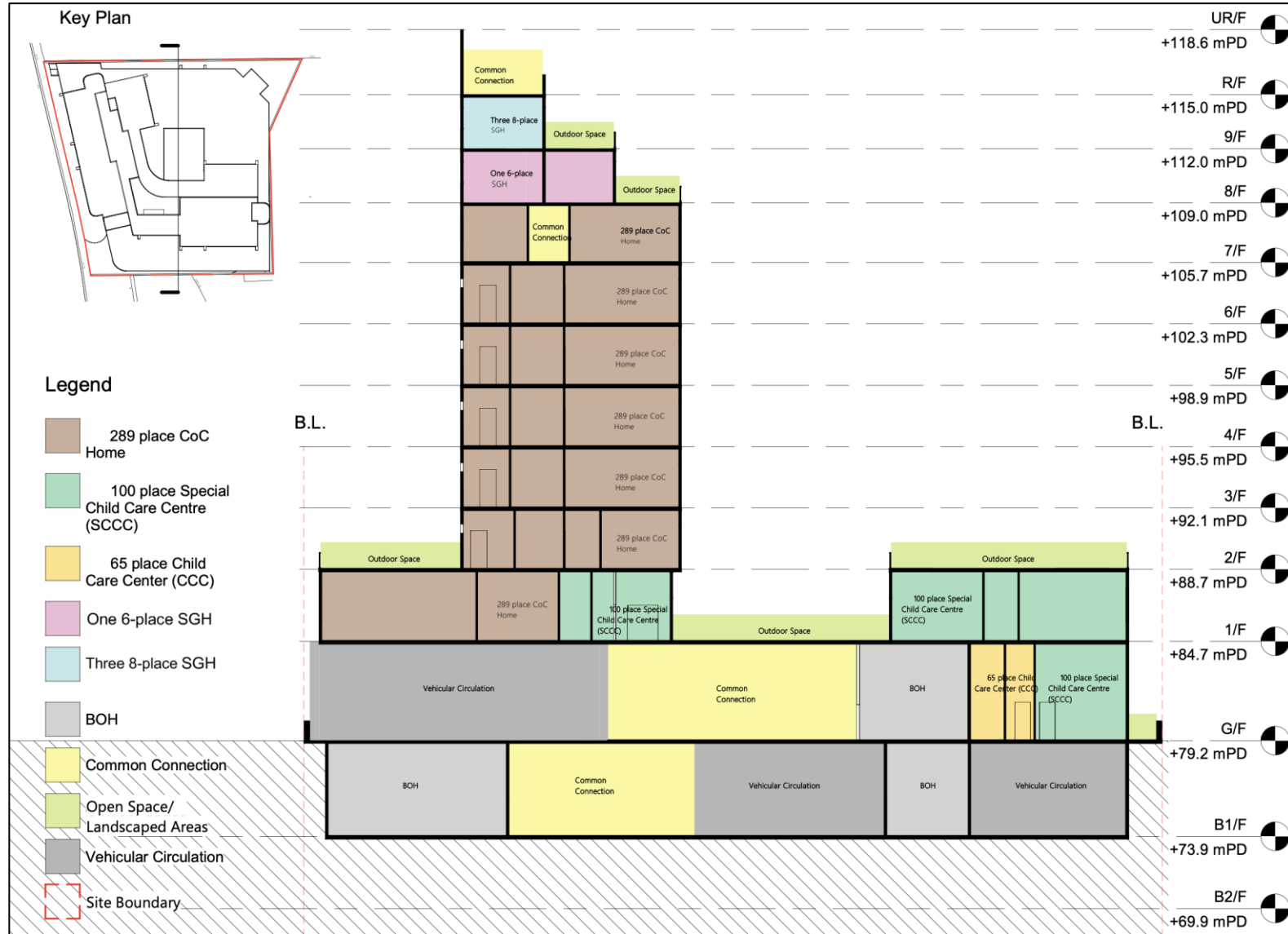


Figure 9: Section of the proposed development

6.2. Landscaping, Recreational and Leisure Spaces

6.2.1. Various resting and landscaped spaces are incorporated into the design of the proposed development. A brief description of the location and the uses are shown in **Table 3**:

Table 3: Landscaping, Recreational and Leisure Spaces

Floor	Landscaping Spaces	Remarks
Roof	Lawn	Green feature not intended for regular users
8/F	Landscape garden with minigolf facilities, herb garden and seatings	for residents/visitors *
7/F and 9/F	Landscape garden with herb garden and seatings	for staff
2/F	Landscape garden with farming area, herb garden, sensory garden, water features, pebble walk and seatings	for residents/visitors*
1/F	Deck with seatings	for residents/visitors*
G/F	Landscape area	for residents/visitors*

*"Visitors" refer to visitors of the residents from SC Complex and not the general public.

6.2.2. The landscape and recreational spaces are proposed to provide a pleasant and comfortable environment for residents, visitors, and staff of the proposed social welfare complex. For example, the landscaping on the G/F act as a buffer between the proposed SC Complex and surrounding traffic and adjacent developments of TPKM Primary School and JIS, as well as to create visual interest and an improved walking environment along Tai Po Road (**Figure 10**). For those located on the upper floors, landscape venues are suitable for resting and recreational uses. Green spaces and sensory areas have benefits for the mental and physical well-being of the users of social welfare facility in the proposed complex. **Figure 11** shows the landscape layout plan for 2/F of the proposed development. An open space area of not less than 325m² is incorporated in the proposed development. Details of the landscape proposal could be found in **Appendix 2**.

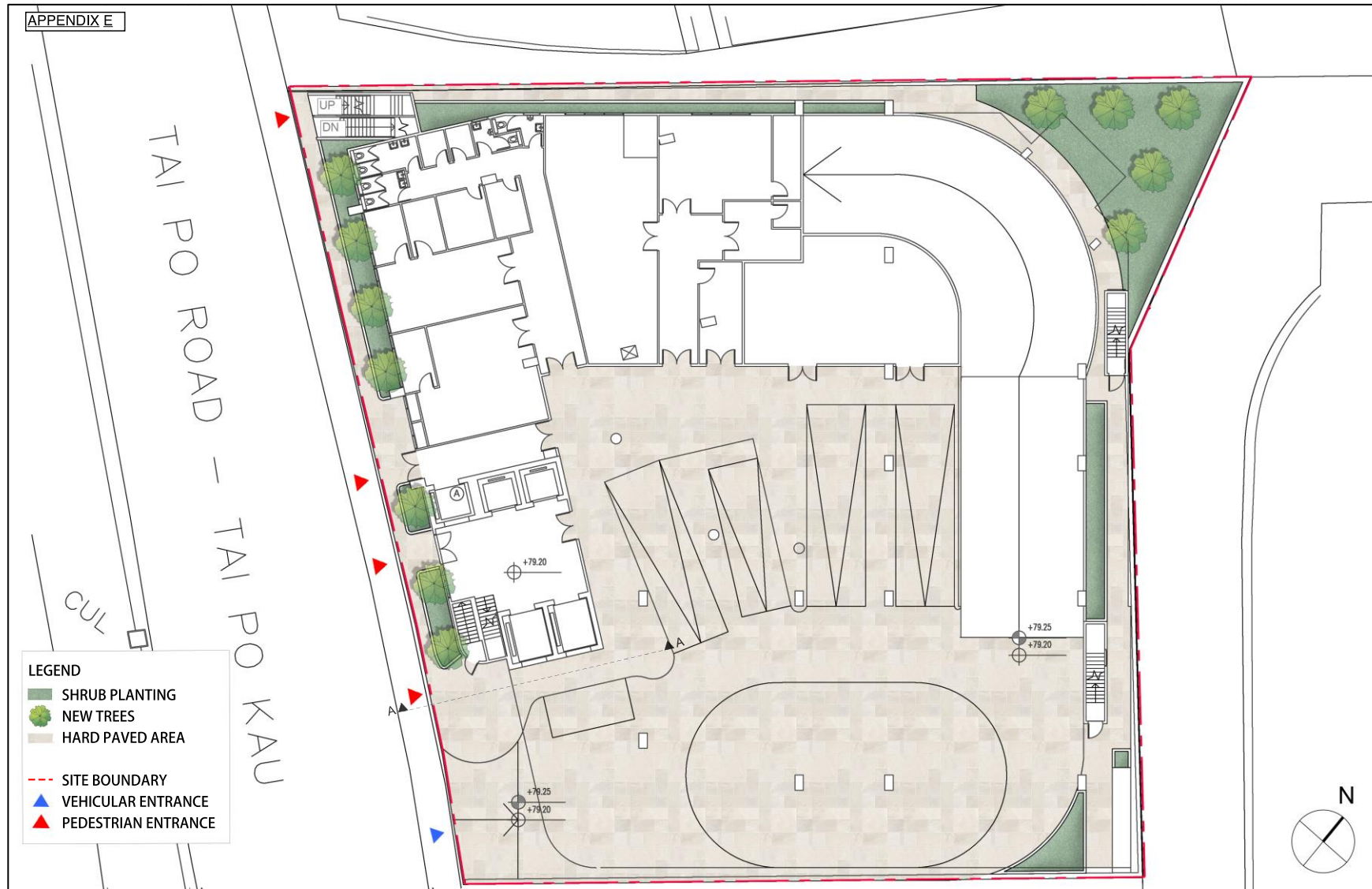


Figure 10: G/F Landscape layout plan of the proposed SC Complex



Figure 11: 2/F Landscape layout plan of the proposed SC Complex

6.3. Internal Transport Provision

6.3.1. The Internal Transport Provision of the Proposed SC Complex is shown in **Table 1** above. There is no specific car parking and loading/unloading requirements for social welfare facilities development based on the latest Hong Kong Planning Standards and Guidelines (HKPSG). With regards to Item 1(b) in Statement of Intent of Table 11 – “Parking Standard” of HKPSG Chapter 8, *“The provision of parking for community facilities should generally be limited to operation requirements. Users of community facilities will generally be expected to use public transport or public car parks.”*

6.3.2. The car parking and loading/unloading provisions advised by SWD have been confirmed by HKSKEWCL to fulfil their operational need. Details of internal transport provision for the proposed development are in **Appendix 3**.

7. Design Considerations

7.1. Design Theme and Placemaking

7.1.1. The Site is located in the tranquil rural area, and enjoys scenic views towards the mountain and Tolo Harbour. The design approach is to create a lively and comfortable environment for the elderly and children to live and reside, with proper building orientation and carefully created open spaces.

7.1.2. There are 2 schools adjacent to the site, JIS to the northwest and PLKTKPM Primary School to the northeast (**paragraph 2.3 refers**). In order to avoid the overlooking of the dormitory and comply with the lighting and ventilation requirement of B(P)R 29-30, the complex is designed with an L-shape tower sitting on a small rectangular podium. There are several benefits: The building core is placed at the “kink” of the “L” for efficient circulation and effective building management. The two wings of the “L” point to the two adjoining schools, with windows opening sideways, so that overlooking and distraction to classrooms are minimised. The L-shape tower shaped the space on podium garden, which would be enjoyed by the users in the complex and served as a visual buffer to neighbours. It also shields the inside against traffic noises from Tai Po Road. The landscaping and greening at the site also soften the building edge to minimize its potential visual impact to surrounding environment. The adoption of building design with use of compatible finishing materials/colour/facade treatment will also be considered at the detail design stage to alleviate the potential visual impacts. The “L” shape proposed also avoided fully build up the whole site to achieve maximum floor area. The site coverage is thus limited to within 42% above 15m.

7.2. Relevant Ordinances, Regulations and Guidelines

7.2.1. The design of the proposed SC Complex respects and complies with a number of relevant ordinances, regulations and guidelines as follow:

- i. Height restrictions for welfare facilities:
 - According to the Child Care Services Regulation Cap. 243A (CSSR), CCC is subject to a maximum height rule of 12m for age under 2 and 24m for other age range. The CCC and SCCC are located at G/F and 1/F which are within 12m from ground level.
 - As regards CoC, it is subject to the height restriction of 24m above ground according to the Residential Care Homes (Elderly Persons) Ordinance (Cap. 459A) (RCHEO). Considering this, CoC Home is proposed at 2/F-6/F, which is under 24m.
- ii. Regulation 21(4) CSSR requires the ceiling of every room of the SCCC to be not less than 3m above the floor level of the room. The proposed development follows this requirement (see **Figure 9** above).

7.3. Building Setback (Appendix 8)

7.3.1. As Tai Po Road - Tai Po Kau Section is considered a rural road, no setback from the road is required according to HKPSG. Besides, a 7.5m building setback from the centreline of the road is fulfilled as per SBDG PNAP APP 152. The separation distance for prescribed window as required by the Building (Planning) Regulation is also complied with. The proposed development has purposefully been designed to optimise setbacks to JIS and TKPM Primary School, ensuring adequate air and visual permeability of the proposed development to adjacent schools, and that overlooking and distraction to classrooms are minimised. About 3m-4m and 8m podium setback (from G/F to 2/F) from JIS and PLKTKPM Primary School respectively, and about 4m-29m and 7m - 31m tower setback (from 3/F and above) from JIS and PLKTKPM Primary School respectively will be provided.

7.4. Greenery and Open View

7.4.1 The building design also incorporates sufficient greenery by introducing multi-level garden spaces and balconies, corresponding to the use of each floor. The majority of the greenery is proposed at G/F, 2/F, and 8/F landscape gardens. The landscape gardens incorporate facilities for both children and the elderly to fit the purpose of each floor. It encourages children, elderly and

staff to be physically active and promotes a healthier lifestyle. It also allows cross-generation activities to be held on special occasions. Balconies and gardens enhance natural ventilation, lighting and improve indoor air and living quality.

7.4.2 The greenery features and the compensatory trees on G/F and 2/F landscape garden will provide visual amenity and comfort. The open view towards Tolo Harbour is available at the north of the site, between JIS and TKPM Primary School, to which the building layout oriented. The provision of the greenery will fulfill the relevant guideline. Details of Landscape Proposal is in **Appendix 2**.

7.5. Sustainable Environmentally Friendly Elements

7.5.1 The Applicant proposes to create a sustainable development at the SC Complex, and aims to obtain the sustainable building performance of "Gold Rating" for the "BEAM Plus New Buildings V2.0" assessment. The measures for achieving this will be further explored in detail design stage.

7.6. Area and Headroom Requirements of Welfare Facilities

7.6.1 The design of the proposed SC Complex has taken account of the following:

- i. The Net Operating Floor Areas (NOFAs) of the proposed welfare facilities which have been agreed with SWD.
- ii. For typical floors (i.e. 3/F-6/F), a general clear height of not less than 2.5m measured vertically from the finished floor.

7.7. Basement and Extent of Excavation Works

7.7.1 Considering the requirements to locate various social welfare facilities below 24m (**paragraph 7.2** above refers), there is a need for a basement to accommodate the supporting facilities for the operation of the social welfare complex. They include a carpark, plant rooms and other back of house uses required to support the operation of the complex.

7.7.2 In particular, the basement will accommodate facilities which are often associated with unwelcoming impressions, including the on-site STP. The periodic collection of dewatered sludge generated from the STP would be done in the basement to minimise the nuisance to the users of the SC Complex.

7.7.3 The amount of excavation work is minimised as far as practicable, the proposed area for the underground is all from necessity. Floor space has been fully utilised in the most efficient manner.

8. Technical Considerations

8.1. Landscape Proposal

8.1.1. The Landscape Proposal in **Appendix 2** comprises an assessment of the impacts on existing trees and presents a proposed landscape layout. It provides a strategy to enhance the proposed development and its integration with its environment. Tree survey has been conducted in accordance with LAO PN No.2/2020 –Tree Preservation and Removal Proposal for Building Development in Private Projects Compliance of Tree Preservation Clause under Lease. A total of 77 trees are surveyed within the Site, among which most are common species. All the trees are proposed to be felled and 46 trees would be compensated within the site. The ratio is optimised given the site constraints such as the building layout, run-in-out, and that new trees has been proposed with minimum 4m spacing to ensure sufficient space for growth.

8.1.2. Amenity planting and landscape treatments including shrubs, groundcover and trees, promotes visual interest and alleviate the potential visual impacts. The total greenery coverage within the Site is not less than 438.26 m² and not less than 212.13 m² in the primary zone (i.e. meeting the required 20% overall greenery coverage and 10% greenery coverage at primary zone in SBDG PNAP APP 152).

8.1.3. Landscape garden at various floors with seating, farming areas, mini golf as well as soft landscaping mentioned, serve as open recreational space for creating a visually pleasing and enjoyable environment for the proposed development and surroundings.

8.2. Traffic Impact Assessment and Transport Considerations

8.3. The traffic impact assessment (TIA) in **Appendix 3** concluded that the proposed development will not generate adverse traffic impacts. The traffic impact assessment demonstrated that all 5 concerned junctions and 4 concerned road links will operate with adequate capacity in the AM and PM Peak periods in year 2033. The assessment also shows that the franchised buses service is adequate to accommodate the additional passenger demand generated by the proposed development. However, one additional GMB services (to Shatin direction) is required to accommodate the future passenger demands generated by the proposed development in AM and PM peak period respectively. The performance of concerned footpath sections and bus layby will operate with no capacity problem during the peak periods in design year 2033. The proposed social services development is therefore supported from the traffic engineering point of view.

8.4. Visual Impact Assessment

8.4.1. The VIA (**Appendix 4**) was carried out to assess the potential visual impact of the proposed development to the surrounding environment. The Town Planning Board Guidelines on Submission of Visual Impact Assessment for Planning Applications to the Town Planning Board (TPB PG-No. 41) was taken into consideration.

8.4.2. The Visual Envelope (VE) was formed by the surrounding area of Nature Reserve, Institutional and Residential building such as Tai Po Kau Nature Reserve, JIS, TKPM Primary School and Deerhill Tower Deerhill Bay. Within the VE, the visual impacts of 6 View Points (VPs) are assessed. The visual impacts of VPs range from “negligible” to “moderately adverse”. It is concluded that the proposed development does not amount to pronounced increase in development scale and intensity and visual changes from key public VPs. It would not adversely impact on the existing visually sensitive areas, visual amenities and visual resources enjoyed by the public.

8.5. Geotechnical Considerations

8.5.1. A Geotechnical Planning Review Report (GPRR) for the proposed development is in **Appendix 5**.

8.5.2. The geological map indicates the regional area around the Site is underlain Lapilli Lithic-Bearing Coarse Ash Crystal Tuff and Tuffite of Yim Tin Tsai Formation. There are 3 nos. of registered geotechnical features lying within or in the vicinity of the Site, including Feature Nos. 7NE-C/C392, 7NE-C/C440 and 7NE-C/C403.

8.5.3. For the proposed development at the Site, it is proposed to form a flat platform to meet the level of adjoining Tai Po Road. It is required to carry out temporary excavation and lateral support works for the construction of basement structure and foundation works at the Site.

8.5.4. For the site formation works on the side adjoining the boundary of Japanese International School (JIS), two schemes are considered:

- Scheme 1: Removal of Feature no. 7NE-C/C403 along the boundary of JIS

After this development, Feature no. 7NE-C/C403 becomes obsolete and removal of this feature reduces the associated geotechnical risk and enables a more efficient use of available space. For ELS works, it would be carried out after the site formation works is down to the proposed ground level +79.2mPD. The pipe pile wall with lagging plates and 3 layers of waling and corner struts are proposed for basement and footing construction. Prior agreement will be obtained before the site formation work related

to feature no. 7NE-C/C403 along the boundary of JIS is carried out.

- Scheme 2: Retain of Feature no. 7NE-C/C403 along the boundary of JIS

In case the lot owner of Feature no. 7NE-C/C403 does not agree the removal of this feature, strengthening works for this slope is required. Furthermore, to allow the minimum spacing for the slope for maintenance, the building in the Site is required to set back from the retained slope.

8.5.5. For the site formation works on the side adjoining the government land, since LandsD does not agree to permanently cut back the topographical feature, a new soldier pile wall within the Site would be created to retain the topographical feature on the adjoining vacant government land.

8.5.6. Based on the study performed, it can be concluded that the proposed development is considered feasible from geotechnical point of view. The construction would be straight forward and unlikely to pose particular problems to the surrounding area under careful planning, proper execution and vigilant supervision.

8.6. Environmental Assessment Report

8.6.1. An Environmental Assessment (EA) is prepared to identify potential environmental impacts and relevant environmental requirements related to the proposed development (**Appendix 6**). No significant adverse impact on air quality, noise, water quality, waste management, and water contamination is anticipated from the proposed development.

8.6.2. It is highlighted that the traffic noise impact was assessed based on the projected peak hour flows for the worst year within 15-years from the date of occupancy. The predicted traffic noise levels at all noise sensitive uses can comply with the HKPSG standard of 70 dB(A) with the installation of the proposed acoustic windows. No adverse traffic noise impact is anticipated.

8.7. Sewerage Impact Assessment

8.7.1. A Sewerage Impact Assessment (SIA) has been conducted to evaluate the potential impacts due to the sewerage generation from the proposed development (**Appendix 7**).

8.7.2. The proposed development will serve approximately 904 people and the estimated sewerage generation from the proposed development will be approximately 168.41m³/day. As there is no existing public sewerage in the vicinity of the Site and, to fulfil the required discharge standards, an underground STP is proposed and provided by the applicant. It will be designed, constructed,

operated and maintained in accordance with the "Guidelines for the Design of Small Sewerage Treatment Plants" published by the EPD to ensure the sewerage generated from the proposed development will be treated to acceptable standards before discharge to the receiving water. Effluent discharge location from the proposed underground STP will be discharged into the existing drainage system to the west of the Site. No adverse water quality impact due to sewerage generation from the proposed development is anticipated.

8.7.3. The flow of the sewerage generated and stormwater runoff from the Site will, however, exceed the capacity of the existing drainage system. Upgrading works of the drainage pipes will be required to cater the treated sewerage and drainage discharge. With the proposed upgrading works, it is concluded that there shall be no sewerage impact arising from the proposed development.

9. Planning Merits and Justification

9.1. Addressing Urgent Need for Social Welfare Facilities

9.1.1. The proposed development is in line with the Government's policy objectives of enhancing the provision of social welfare facility for elders and the purpose of the Special Sites Scheme. The proposed SC Complex will provide a total of 289 CoC Home places which will help alleviate the pressing demand for RCHE facilities. Furthermore, the proposal will be able to provide various "Family and Child Welfare" services for the community, including SCCC, FCS & ABPSS. There will be 30 SGH places provided which will increase the capacity of the currently highly enrolled SGH services.

9.2. Aligning with Government Policies of Developing Multi-purpose Facility Buildings

9.2.1. The SSMU policy was first put forward in the 2018 Policy Address to accommodate multiple uses in a single site, to optimise the development potential of the Site, which in turn helps address the limited land supply. The SC Complex will accommodate a range of social welfare facilities with various landscape features. Its development aligns with the SSMU policy promulgated by the Government which is for better utilisation of the scarce land resource.

9.3. Need for Minor Relaxation of the BHR due to Site Constraint

9.3.1. The Site is stipulated with a BHR of 8-storey under the OZP. However, with various site constraints being located directly adjacent to other school developments and the need to accommodate social welfare facilities of high demand (**paragraph 2.3** refers), good design solution for the proposed development is limited. The proposed SC Complex has purposefully been designed to

optimise setbacks to JIS and TKPM Primary School, ensuring adequate air and visual permeability of the proposed development to adjacent schools, and that overlooking and distraction to classrooms are minimized (**paragraph 7.3** refers).

9.3.2. Furthermore, the magnitude of the requested relaxation of building height from 8-storey to 10-storey is also minor in relation to the large amount of GFA to be accommodated in the SC Complex. Also, under the Notes of the OZP, any basement floor(s) may be disregarded in determining the maximum number of storeys for BHR. Therefore, the need to request for a minor relaxation of the BHR is justified.

9.4. **Support from Social Welfare Department**

9.4.1. During the s.16 planning application pre-submission stage in March 2022, SWD stated that the proposed SC Complex is in line with the Special Sites Scheme, and its application for minor relaxation of the BHR as necessitated by the development is thus supported by SWD from social welfare perspective.

9.5. **Meeting the Planning Intention for the "G/IC" zone of the Outline Zoning Plan**

9.5.1. The proposed SC Complex meets the planning intention of the "G/IC" zone under the OZP, providing social welfare facilities primarily serving the needs of local residents and/or wider district, region or the territory. The Applicant is a well-known and long-established NGO which has provided a generous amount of social welfare services for the community in Hong Kong.

9.6. **Proposed SC Complex Fulfills the Criteria for Minor Relaxation of BHR**

9.6.1. The proposed development of the SC Complex has positively responded to some of the criteria for minor relaxation of BHR (**paragraph 4.1.4** refers).

9.7. Proposed Development is Compatible with Surrounding

9.7.1. The proposed SC Complex fits in well with the existing gently sloping profile (**Figure 12**). It reflects the taller mountain backdrop, whilst the other surrounding developments act as a transition to lower building height, and gradually descending towards the sea following a stepped building height profile. The proposed development as well as its landscape proposal have given due respect to the existing natural elements at the site.



Figure 12: Stepped building height concept still maintained with the proposed SC Complex

9.7.2. The minor increase in building height will not create an unacceptable building bulk and visual impact that would adversely affect the neighbourhood. A VIA can be viewed in **Appendix 4**.

9.8. Need for Underground Carpark

9.8.1. The proposed SC Complex accommodates various social welfare facility (with a height restriction of 24m space above G/F), and requires vehicular and carparking spaces for its daily operation and emergency services. Excavation works for basement have been minimized as far as practicable, the proposed area for the underground is all from necessity. Floor space has been fully utilised in the most efficient manner.

9.8.2. There are several advantages of prioritising essential services on the G/F and lower floors of the SC Complex, and having the remaining operational and car parking facilities in the LG1/F:

- i. Optimum efficiency for emergency and essential services whilst maximises safe mobility and security for elders, children, disabled or other vulnerable users or visitors to access the building;
- ii. Eliminates the need for a taller building and minimises the building bulk;
- iii. Reduces the need for queuing of vehicles on the street level, which may cause traffic jam at Tai Po Road;

- iv. Opens up opportunities for incorporating more landscaping and improving the pedestrian streetscape;
- v. Better hygiene and environment to have traffic and E&M facilities separate from major human activities; and
- vi. Unattractive E&M facilities are hidden from the streetscape and public.

9.9. **No Adverse Technical Impact**

9.9.1. Various technical assessments attached in this planning application has demonstrated that there are no adverse technical impacts from the proposed SC Complex.

9.10. **Design Respects the Relevant Requirements, Regulations and Guidelines**

9.10.1. The design of the proposed development has taken account of the licensing requirements and regulations of the social welfare facilities as well as the regulation and safety requirements. It satisfies with the CSSR and RCHEO (**paragraph 7.2** refers).

9.11. **Commitment Towards a Sustainable Development**

9.11.1. The Applicant proposes to create a sustainable development at the SC Complex, and aims to obtain the sustainable building performance of "Gold Rating" for the "BEAM Plus New Buildings V2.0" assessment. The measures for achieving this will be further explored in detail design stage.

10. **Conclusion**

10.1 This s.16 planning application relates to the development of the SC Complex. All proposed uses included in the scheme are Column 1 uses and are permitted as of right in the "G/IC" zone under the OZP. A s.16 planning application for minor relaxation of BHR is required because the proposed development of 10-storey exceeds the BHR of 8-storey imposed on the Site.

10.2 The proposed 10-storey design is needed to accommodate the facilities which serve the community and the wider region. The 10-storey design also respects the neighbouring school development to provide visual relief and better air and light penetration to the proposed development as well as to the adjacent schools.

10.3 The SC Complex is considered technically feasible and will provide significant benefits to the

community, and helps to alleviate the high-demand for social welfare facilities especially CoC and SGHs. Furthermore, it meets various Government policy objectives, such as the Special Sites Scheme and the SSMU policy. This will address the urgent community needs and enable better utilisation of the valuable land resources in the territory.

- 10.4 The proposed development is an outcome of careful consideration, as a balanced design having addressed various site constraints and operational requirements. The TPB is invited to give favourable consideration to this s.16 planning application so that the SC Complex could be implemented to serve the community.