



Date: 16th August 2024

Page(s): 1 + Appendice
BY HAND & EMAIL
(tpbpd@pland.gov.hk)

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

Dear Sir/Madam,

**SECTION 16 APPLICATION
TOWN PLANNING ORDINANCE (CHAPTER 131)**

Proposed Minor Relaxation of Plot Ratio (PR) and Site Coverage (SC) for Proposed Social Welfare Facility (Residential Care Home for the Elderly) (RCHE(s)), Training Centre with Residential Institution and Permitted Residential Development (Flat) in Lot 94 in D.D. 388 and adjoining Government land, Castle Peak Road – Tsing Lung Tau, Tsuen Wan

Application No. A/TWW/129 - Supplementary Information

We refer to the captioned application submitted to the Town Planning Board on 6th August 2024. As per our discussion with the Planning Department, we would like to submit herewith the replacement pages to supersede the original version of the pages:

- Appendix 1: Replacement Pages of Application Form (P. 7 and P.15)
- Appendix 2: Replacement Pages of Planning Statement (P.1, 2, 5, 7, 18, 24)
- Appendix 3: Replacement Pages of Visual Impact Assessment (P.6)

We should be most grateful if you can notify us of any departmental comments or queries on the application for our corresponding action in due course.

Should you have any queries with this submission, please feel free to contact Mr. Mario Li at [REDACTED] or the undersigned at [REDACTED].

Yours faithfully,
FOR AND ON BEHALF OF
DeSPACE (INTERNATIONAL) LIMITED

Greg Lam



Appendix 1

Replacement Pages of Application Form

(P. 7 and P.15)

(iv) For Type (iv) application 供第(iv)類申請

- (a) Please specify the proposed minor relaxation of stated development restriction(s) and **also fill in the proposed use/development and development particulars in part (v) below** –
請列明擬議略為放寬的發展限制並填妥於第(v)部分的擬議用途/發展及發展細節 –

- Plot ratio restriction 地積比率限制 From 由 **2.1** to 至 **5.73**
- Gross floor area restriction 總樓面面積限制 From 由sq. m 平方米 to 至sq. m 平方米
- Site coverage restriction 上蓋面積限制 From 由 **17.5**% to 至 **not exceeding 95%**
- Building height restriction 建築物高度限制
From 由m 米 to 至 m 米
From 由 mPD 米 (主水平基準上) to 至mPD 米 (主水平基準上)
From 由 storeys 層 to 至 storeys 層
- Non-building area restriction 非建築用地限制 From 由m to 至 m
- Others (please specify) 其他 (請註明)

(v) For Type (v) application 供第(v)類申請

(a) Proposed use(s)/development
擬議用途/發展

Proposed Social Welfare Facility
(Residential Care Home for the Elderly) (RCHE(s)),
Training Centre with Residential Institution
and permitted Residential Development (Flat)

(Please illustrate the details of the proposal on a layout plan 請用平面圖說明建議詳情)

(b) Development Schedule 發展細節表

- Proposed gross floor area (GFA) 擬議總樓面面積 **18,942** sq.m 平方米 About 約
- Proposed plot ratio 擬議地積比率 **5.73** About 約
- Proposed site coverage 擬議上蓋面積 **Not exceeding 95** % About 約
- Proposed no. of blocks 擬議座數 **1**
- Proposed no. of storeys of each block 每座建築物的擬議層數 **16** storeys 層
 include 包括.....storeys of basements 層地庫
 exclude 不包括...**1**...storeys of basements 層地庫
Not more
- Proposed building height of each block 每座建築物的擬議高度 **.than 60** mPD 米(主水平基準上) About 約
..... m 米 About 約

(iii) Building height/No. of storeys 建築物高度／層數	Domestic 住用		m 米 <input type="checkbox"/> (Not more than 不多於)
			mPD 米(主水平基準上) <input type="checkbox"/> (Not more than 不多於)
			Storeys(s) 層 <input type="checkbox"/> (Not more than 不多於) (<input type="checkbox"/> Include 包括 <input type="checkbox"/> Exclude 不包括 <input type="checkbox"/> Carport 停車間 <input type="checkbox"/> Basement 地庫 <input type="checkbox"/> Refuge Floor 防火層 <input type="checkbox"/> Podium 平台)
	Non-domestic 非住用		m 米 <input type="checkbox"/> (Not more than 不多於)
			mPD 米(主水平基準上) <input type="checkbox"/> (Not more than 不多於)
			Storeys(s) 層 <input type="checkbox"/> (Not more than 不多於) (<input type="checkbox"/> Include 包括 <input type="checkbox"/> Exclude 不包括 <input type="checkbox"/> Carport 停車間 <input type="checkbox"/> Basement 地庫 <input type="checkbox"/> Refuge Floor 防火層 <input type="checkbox"/> Podium 平台)
	Composite 綜合用途		m 米 <input type="checkbox"/> (Not more than 不多於)
		60	mPD 米(主水平基準上) <input checked="" type="checkbox"/> (Not more than 不多於)
		16 1	Storeys(s) 層 <input type="checkbox"/> (Not more than 不多於) (<input type="checkbox"/> Include 包括 <input checked="" type="checkbox"/> Exclude 不包括 <input type="checkbox"/> Carport 停車間 <input checked="" type="checkbox"/> Basement 地庫 <input type="checkbox"/> Refuge Floor 防火層 <input type="checkbox"/> Podium 平台)
(iv) Site coverage 上蓋面積	Not exceeding 95 % <input type="checkbox"/> About 約		
(v) No. of units 單位數目	Flat: 112 units RCHE: 240 - 320 beds		
(vi) Open space 休憩用地	Private 私人	623	sq.m 平方米 <input checked="" type="checkbox"/> Not less than 不少於
	Public 公眾		sq.m 平方米 <input type="checkbox"/> Not less than 不少於

Appendix 2

Replacement Pages of Planning Statement

(P.1, 2, 5, 7, 18, 24)

EXECUTIVE SUMMARY

The Applicant, **Loi Hing Investment Company Limited**, now seeks town planning permission from the Town Planning Board (TPB) for minor relaxation of Plot Ratio (PR) and Site Coverage (SC) for proposed Social Welfare Facility (Residential Care Home for the Elderly) (RCHE(s)), Training Centre with Residential Institution and permitted Residential Development (Flat) in Lot 94 in D.D. 388 and adjoining Government land, Castle Peak Road – Tsing Lung Tau, Tsuen Wan (The Site).

The Site falls within the “Residential (Group B)” (“R(B)”) zone under the Approved Tsuen Wan West Outline Zoning Plan No. S/TWW/21 (“the OZP”). According to the OZP, “Social Welfare Facility” and “Training Centre” falls into Column 2 use which requires planning permission from the Town Planning Board (TPB) with or without conditions, whereas “Flat” and “Residential Institution” falls into Column 1 use which is always permitted within “R(B)” zone. Any development/redevelopment within the “R(B)” zone is subject to restrictions of maximum PR and SC of 2.1 and 17.5% respectively (for BH over 33m), and a maximum BH of 60mPD. Inasmuch, the Applicant intends to apply for a minor relaxation of PR from 2.1 to 5.73 (2.1 for Flat, 3.55 for RCHE, 0.06 for Training Centre and 0.02 for Residential Institution) and **SC from 17.5% to 95%** for the proposed RCHE(s), training centre with residential institution and permitted flat development.

The Government has launched the enhanced Incentive Scheme to Encourage Provision of Residential Care Homes for the Elderly (RCHEs) in New Private Developments - Time-limited Enhancements (LandsD's Practice Note Issue No. 5/2023) to provide more incentives for developers to build and operate RCHEs in private development projects. Developers are encouraged to increase the PR and SC of their private development projects by applying to the TPB to incorporate RCHE(s) within the buildings.

The Applicant has a genuine intention to leverage market forces for a self-financing development that will provide senior living and care solutions with an elevated level of quality to foster "active ageing". With expertise and resources in the elderly care sector, the Applicant is prepared to provide one-stop, holistic, high quality senior living residential facilities with ageing-in-place care services through this development proposal, to serve the rapidly expanding ageing community in Hong Kong. To proceed with the proposed development, a minor relaxation for PR and SC will be required to promptly respond to the latest policy agenda of enhancing the exempted GFA from 5,400m² to 12,000m².

The proposed composite development is fully justified in terms of planning and social welfare merits. It is anticipated that the proposed composite development would not result in insurmountable impacts to the surroundings. Given the aforementioned justifications, the Applicant respectfully requests the TPB to approve the subject application.

(Disclaimer: This Chinese translation is for reference only. If there is any discrepancy between the Chinese translation and the English original, the English original shall prevail.)

行政摘要

申請人 **Loi Hing Investment Company Limited**，現尋求城市規劃委員會（下稱城規會）批准，在現位於荃灣青山公路青龍頭段，丈量約份第 388 約地段第 94 號及毗鄰政府土地（下稱申請地點），略為放寬地積比率和上蓋面積，以發展擬議的社會福利設施（安老院舍）、訓練中心暨住宿機構和經常准許的分層樓宇用途。

申請地點座落於荃灣西部分區計劃大綱核准圖編號 S/TWW/21（大綱圖）下的住宅（乙類）地帶。根據大綱圖，在住宅（乙類）地帶，「社會福利設施」及「訓練中心」屬於第二欄用途，須先向城規會申請，可能在有附帶條件或無附帶條件下獲准的用途。分層樓宇及「住宿機構」則屬於第一欄用途，為經常准許的用途。在住宅（乙類）地帶，任何新發展或現有建築物的重建，均受限於最高地積比率和上蓋面積，分別為 2.1 和 17.5% 的限制（對於建築物高度超過 33m），以及建築物高度限制為主水平基準上 60 米。因此，申請人作出略為放寬申請，將地積比率從 2.1 放寬至 5.73（2.1 為分層樓宇、3.55 為安老院舍、0.06 為訓練中心及 0.02 為住宿機構）和上蓋面積從 17.5% 放寬至 95%。

政府推出「鼓勵在新私人發展物業內提供安老院舍的計劃 - 優化措施」（地政處作業備考編號 5/2023），為發展商提供更多誘因，鼓勵於私人發展項目中興建和營運安老院舍。政府鼓勵發展商向城規會申請增加地積比率及上蓋面積，將安老院舍納入私人發展項目中。

申請人運用市場力量，以自負盈虧方式發展，提供高質素的安老生活和護理方案，以推動「老有所為」。申請人憑藉在安老領域的專業知識和資源，透過此發展計劃，提供一站式、全方位、高質素的安老服務和設備，服務本港迅速擴張的老齡化社區。推進擬議發展項目，需要略為放寬地積比率和上蓋面積，以回應最新的政策豁免總樓面面積從 5,400 平方米增加到 12,000 平方米。

擬議的綜合發展項目在規劃和社會福祉方面均有充分理據。預計擬議綜合發展項目不會對周圍環境造成不可克服的影響。鑑於上述理據，申請人懇請城規會此准該申請。

（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。）

- 1.3.2 The proposed RCHE(s) are eligible for exemption from GFA calculation under the *Incentive Scheme – Time-limited Enhancements*. It has a non-domestic PR of about 3.55 and **SC of a range of 64% to 95%**, which have exceeded the PR and SC restrictions on the OZP. The Training Centre with Residential Institution is proposed for a non-standard provision within the RCHE area with a non-domestic PR of about 0.06 and a domestic PR of about 0.02. The permitted flat under this proposal has a domestic PR of about 2.1 and **SC of not exceeding 35%**, which also has exceeded the SC restriction.
- 1.3.3 Inasmuch, the applicant intends to apply for a minor relaxation of PR and SC for the proposed RCHE(s), Training Centre with Residential Institution and permitted Flat development. This relaxation would involve increasing the PR from 2.1 to 5.73 and the **SC from 17.5% to 95%**. The primary objective of this relaxation is to accommodate the RCHE(s) and align with policy initiatives. Additionally, the increase in SC for flat development with a permitted PR of 2.1 aims to reduce the visual impact by avoiding alterations to the statutory BH with a maximum at 60mPD.

1.4 Report Structure

- 1.4.1 Section 1 is an introduction. Section 2 gives a brief overview of the Site context. Section 3 presents the planning context to the Site. Section 4 contains a full description of the proposed composite development. Planning and technical justifications for the development are elaborated in Section 5. Section 6 presents the concluding remarks and summarizes the grounds for approval of the Application.

- i. Exempt one or more eligible RCHE(s) premises from payment of land premium in land transactions of lease modification, land exchange and private treaty grant for new private developments (excluding industrial developments)¹ (each "a Proposed Development"); and
- ii. Exempt eligible RCHE(s) premise² from the calculation of total permissible gross floor area under lease.

3 Planning Context

3.1 Statutory Planning Context

- 3.1.1 The Site is currently zoned as "R(B)" under the OZP. The planning intention for this zone is intended primarily for medium-density residential developments where commercial use serving the residential neighbourhood may be permitted on application to the Board.
- 3.1.2 The proposed RCHE(s) are subsumed under the "Social Welfare Facility". In accordance with the Notes of the OZP, "Social Welfare Facility" and "Training Centre" falls into Column 2 use that may be permitted with or without conditions on application to the TPB while the Flat and Residential Institution is a Column 1 use which is always permitted. In addition, any development/redevelopment within the "R(B)" zone is subject to restrictions of maximum PR and SC of 2.1 and 17.5% respectively (for BH over 33m), and a maximum BH of 60mPD.
- 3.1.3 The proposed PR and SC has exceeded the maximum PR and SC under the subject zone from 2.1 to 5.73, and from 17.5% to 95% respectively. The proposed BH does not exceed the restriction.
- 3.1.4 As a matter of fact, the proposed social welfare facility (RCHEs) and training centre with residential institution is considered not incompatible with the surrounding area which is of residential in nature in a seaside setting comprising open seaview. The proposed social welfare facility is to serve the surrounding neighbourhood in which no RCHE has been found in Tsing Lung Tau.

¹ Addition to or alteration or conversion of existing building(s) will not be considered as constituting a new private development.

² The eligible RCHE premises has to comply with the Town Planning Ordinance (Cap. 131) ("TPO") and the Buildings Ordinance (Cap. 123) ("BO"), among others. Planning application under Section 12A or section 16, as appropriate, of the TPO is required if the proposed RCHE is not always permitted and/or has resulted in exceedance of the maximum plot ratio/GFA/building height permissible under the Notes of the respective Outline Zoning Plan ("OZP"). The Town Planning Board will consider each application based on individual merits of the case. RCHE in private development is GFA accountable under the Building (Planning) Regulations. During the Pilot Period, the Building Authority is prepared to grant modification to permit a higher plot ratio/GF A to accommodate the additional GF A of the RCHE in the development site under the BO taking into account the Planning Department ("PlanD")'s advice on the planning intention as well as whether the provisions and requirements under the OZP or planning approval have been complied with when processing the general building plans.

Table 3: Proposed Key Development Parameters

Application Site Area (approx.)	Total: 3,306 m ²
Private Land	1,904 m ²
Government Land	1,402 m ²
(¹)Total GFA (approx.)	Total: 18,942 m ²
(²)Flat	6,942 m ² (excluding clubhouse of about 347 m ²)
RCHE(s)	11,750 m ²
(⁶)Training Centre	200 m ²
(⁶)Residential Institution	50 m ²
(¹)Plot Ratio (PR)	5.73
Flat	2.1
(³) RCHE(s)	3.55
(⁶)Training Centre	0.06
(⁶)Residential Institution	0.02
(¹)Site Coverage (SC) (approx.)	Not exceeding 95%
No. of Building Block	1
No. of Storeys	16 storeys (excluding 1 basement floor)
Flat	8 storeys
RCHE(s)	8 storeys
Building Height	Not more than 60mPD (Absolute Building Height = 54.8 m) (NB: The mean street level is +5.2mPD)
No. of beds of RCHE(s)	240-320
No. of Flat	112
Anticipated Population	623
(⁴)Flat	303
RCHE(s)	320
No. of Car Parking Spaces for RCHE(s)	16 (including 1 accessible parking)
Private Car	2
Light Bus/ Ambulance Parking Space	
No. of Car Parking Spaces for Flat	31 (including 1 accessible parking)
Private Car	5
Visitor	2
Motorcycle	1
HGV Loading/Unloading Bay	
Private Open Space	Not less than 623 m²
Greenery Area	About 20%
(⁵)Tree Felling/Preservation Proposal	
No. of existing trees	20
Trees to be felled	20
New trees to be planted	30 (compensation ratio of 1: 1.5)

Remarks:

(¹) According to the Remarks under the Notes of the OZP, In determining the maximum plot ratio/site coverage or GFA, any floor space that is constructed or intended for use solely as car park, loading/unloading bay, plant room and caretaker's office, or caretaker's quarters and recreational facilities for the use and benefit of all the owners or occupiers of the domestic building or domestic part of the building, provided such uses and facilities are ancillary and directly related to the development or redevelopment, may be disregarded. Please be invited to note that the current "R(B)" zone is subject to restriction of maximum SC at 17.5% and the proposed SC is to allow RCHE provision with GFA not exceeding 12,000m² while maintaining the BHR at 60mPD unchanged.

(²) The floor area of the proposed clubhouse shall be exempted from GFA calculation, subject to the decisions by the Building Authority (BA) at building plan submission stage.

(³) As long as the premises is to be used as licensed RCHE(s), the Applicant may lease or sell the premises as one whole unit, or operate the RCHE in the premises by themselves or by entrusting an organisation, whereby the service fees will be set by the developer or operator(s). (Pursuant to the Incentive Scheme to Encourage Provision of Care Homes for the Elderly Premises in New Private Developments - Time-limited Enhancements)

(⁴) Based on Average household size of 2.7 with reference to 2022 Population by-Census: Average household size of Tsuen Wan DC district https://www.censtat.gov.hk/en/web_table.html?id=130-06806

(⁵) The landscape proposal and tree preservation and removal proposal under planning application A/TWW/122 have been approved and will be adopted without any changes in the current proposal

(⁶) The training centre with residential institution is planned to be located within the RCHE(s) area. This non-standard provision is proposed to be considered eligible for exemption from payment of land premium under the Incentive Scheme, pending further deliberation and approval from the Labour and Welfare Bureau and relevant Departments.

necessary aged care and residential options. It will help the elderly maintain independence for as long as possible, allowing them get around and get on with their daily activities safely, reach out to on-site care services and available support whenever needed, to age in place within their own familiar homes and neighbourhoods. It presents an innovative new model responding to the government policy of “age in place with institutional care as backup”.

5.6 No Adverse Visual Impact

- 5.6.1 The Site is located in an urban area that is predominantly characterized by medium-rise residential buildings such as Hong Kong Garden, L'Aquatique, and Royal Sea Crest, with building heights ranging from 60mPD to 120mPD. A 16-storey composite building is proposed to be erected on the site, which adheres to the BH of 60mPD specified in the OZP. Only the SC of the proposed development has exceeded its respective restriction, with the lower portion from the G/F to 7/F having a SC from 64% to 95%, and the remaining upper portion having a SC of not exceeding 35%.
- 5.6.2 While respecting the stepped building height profile, the proposed development is considered in an optimal scale, as a result of a balance of (i) maintaining a harmonised and compatible massing in relation to the local context with a medium-rise character on one hand, and also (ii) providing sufficient quality bed spaces to alleviate the pressing need of social welfare facilities on the other.
- 5.6.3 The main visual impacts of the proposed development arise from the increased SC. A Visual Impact Assessment (VIA) is conducted on 5 viewpoints in support of this planning application. It is assessed to compare the visual impact of the proposed development against the existing condition. Please refer to the **Appendix 4 – Visual Impact Assessment**. It is anticipated that the increase in SC would not generate adverse visual impact to the surrounding.

5.7 No Adverse Traffic Impact

- 5.7.1 There is currently no proper vehicular ingress/egress point to the Site. The proposed vehicular ingress/egress is provided at the south-eastern corner of the Site after realignment of the existing footbridge NF437 to meet the sightline requirement without affecting the noise barrier and to provide adequate distance from the existing bus stop.
- 5.7.2 The internal transport facilities provided for Residential Use comply with the maximum recommendations of the HKPSG. Since the HKPSG has no recommendation on the provision of internal transport facilities for RCHE, the internal transport facilities provided for RCHE is based on the operational need with reference to the similar RCHE. The summary of internal transport facilities for the development is shown in the table below. The layout of the car park is shown in **Appendix 2 – Development Scheme**.

Appendix 3

Replacement Pages of Visual Impact Assessment (P.6)

Table 1 – Major Development Parameters	
Major Development Parameters	Proposed Scheme
Application Site Area (approx.)	Total: 3,306 m ²
Private Land	1,904 m ²
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(¹)Total GFA (approx.)	Total: 18,942 m ²
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Remarks:

(¹) According to the Remarks under the Notes of the OZP, In determining the maximum plot ratio/Site coverage or GFA, any floor space that is constructed or intended for use solely as car park, loading/unloading bay, plant room and caretaker's office, or caretaker's quarters and recreational facilities for the use and benefit of all the owners or occupiers of the domestic building or domestic part of the building, provided such uses and facilities are ancillary and directly related to the development or redevelopment, may be disregarded. Please be invited to note that the current "R(B)" zone is subject to restriction of maximum SC at 17.5% and the proposed SC is to allow RCHE provision with GFA not exceeding 12,000m² while maintaining the BHR at 60mPD unchanged.

(²) The floor area of the proposed clubhouse shall be exempted from GFA calculation, subject to the decisions by the Building Authority (BA) at building plan submission stage.

(³) As long as the premises is to be used as licensed RCHE(s), the Applicant may lease or sell the premises as one whole unit, or operate the RCHE in the premises by themselves or by entrusting an organisation, whereby the service fees will be set by the developer or operator(s). (Pursuant to the Incentive Scheme to Encourage Provision of Care Homes for the Elderly Premises in New Private Developments - Time-limited Enhancements)

(⁴) Based on Average household size of 2.7 with reference to 2022 Population by-Census: Average household size of Tsuen Wan DC district https://www.censtatd.gov.hk/en/web_table.html?id=130-06806

(⁵) The landscape proposal and tree preservation and removal proposal under planning application A/TWW/122 have been approved and will be adopted without any changes in the current proposal.

(⁶) The training centre with residential institution is planned to be located within the RCHE(s) area. This non-standard provision is proposed to be considered eligible for exemption from payment of land premium under the Incentive Scheme, pending further deliberation and approval from the Labour and Welfare Bureau and relevant Departments.