



CLIENT
Loi Hing Investment
Company Limited

PLANNING CONSULTANT
DeSPACE (International) Limited

SECTION 16 PLANNING APPLICATION

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

AUGUST 2024

TABLE OF CONTENTS

EXECUTIVE SUMMARY	1
1 INTRODUCTION	3
1.1 Purposes	
1.2 Applicant's Background	
1.3 Intended Minor Relaxation	
1.4 Report Structure	
2 SITE CONTEXT	6
2.1 Local Site Context	
2.2 Surrounding Area of the Site	
2.3 Land Status	
3 TOWN PLANNING CONTEXT	7
3.1 Statutory Planning Context	
3.2 Non-Statutory Planning Context	
3.3 Previous Planning Application	
3.4 Similar Planning Application(s)	
4 PROPOSED DEVELOPMENT	15
4.1 Planning Concepts	
4.2 Proposed Scheme	
4.3 Proposed RCHE(s)	
4.4 Permitted Flat	
4.5 Planning and Design Merits	
5 PLANNING AND DEVELOPMENT JUSTIFICATIONS	22
5.1 In Line with Planning Intention	
5.2 Compatible with Surrounding Area	
5.3 Shortage of Quality RCHEs and the Prevailing Policy Support for RCHE(s) with GFA Exemption	
5.4 Providing an Elderly Housing Option Which Helps Diversify the Housing Market	
5.5 Promoting "Ageing in Place as the Core, with Institutional Care as a Backup"	
5.6 No Adverse Visual Impact	
5.7 No Adverse Traffic Impact	
5.8 No Adverse Environmental Impacts	
5.9 No Adverse Drainage Impact	
5.10 No Adverse Sewerage Impact	
5.11 No Significant Air Ventilation Impact	
5.12 No Adverse Landscape Impact	

LIST OF TABLES

Table 1	Minor Relaxation of PR and SC in R(B) zone under the same OZP
Table 2	Minor Relaxation of PR in Residential Zone of Different OZP
Table 3	Proposed Key Development Parameters
Table 4	Summary of internal transport facilities for the development

LIST OF FIGURES

Figure 1	Location Plan
Figure 2	Lot Index Plan

LIST OF APPENDICES

Appendix 1	Incentive Scheme – Time-limited Enhancements
Appendix 2	Development Scheme
Appendix 3	RCHE SoA Table
Appendix 4	Visual Impact Assessment
Appendix 5	Traffic Impact Assessment
Appendix 6	Environmental Assessment
Appendix 7	Drainage Impact Assessment
Appendix 8	Sewerage Impact Assessment
Appendix 9	Air Ventilation Assessment – Expert Evaluation

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 Introduction

1.1 Purposes

- 1.1.1 DeSPACE (International) Limited acts on behalf of the Applicant, **Loi Hing Investment Company Limited**, to submit this Section 16 planning application to seek 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.
- 1.1.2 In 2023, the Government introduced the "*Incentive Scheme to Encourage Provision of Residential Care Homes for the Elderly Premises in New Private Developments - Time-limited Enhancements*" (LandsD's Practice Note Issue No. 5/2023) (hereinafter referred to as "*the Incentive Scheme – Time-limited Enhancements*") with the aim of incentivizing developers to construct and operate RCHEs within private development projects. The *Incentive Scheme – Time-limited Enhancements* offers **exemptions for eligible RCHE premises, allowing them to be excluded from the calculation of the total permissible gross floor area of the development projects** as stipulated in the land lease. This scheme serves as a proactive measure to promote development of RCHEs within private developments.
- 1.1.3 Pursuant to this policy and taking into account the acute demand for RCHEs in Hong Kong, the Applicant as the sole registered owner of the private lot intends to develop a RCHE(s) together with the permitted Residential Development (Flat) on the captioned land (hereinafter referred to as "the Site") (See **Figure 1 and Figure 2**).
- 1.1.4 In addition, a Training Centre (about 200m²) with Residential Institution (about 50m²), is proposed within the RCHE(s) area. It is used for conducting training programmes in connection with the profession and/or educational institutions. The ancillary dormitory (about 50m²) is provided to accommodate student undergoing overnight duty placements. The purpose is to nurture young talents of allied health professionals through training and in-situ placement in particular night shift training where there's no such opportunity for the students at the moment. 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**.

1.2 Applicant's Background

- 1.2.1 The Applicant, being the subsidiary company of the Chinachem Group (the Group), has a corporate commitment to maintaining a balance among 'People, Prosperity, and Planet' in all their business endeavors, with a strong dedication to creating

positive impacts on the society. While aging is often accompanied by various health challenges, and with the number of family households in Hong Kong getting smaller and senior singletons increasing, many families need appropriate aged care and nursing support for their seniors in an era of HK's rapidly ageing population. The traditional RCHEs in Hong Kong with highly intensive and attentive nursing cares and residents, presents one type of residential option only, which may not meet the lifestyle aspirations of different seniors. The Group sees and aims to address this "gap" or "imbalance":- a shortage of high-quality residential options for elderly looking for a more refined/graceful way of living, living less like a patient and with their holistic health and well-being well taken care of with quality services and environment provided.

- 1.2.2 The Group possesses the expertise and resources of the experienced, reputable provider in the elderly care sector – the Pine Care Group, which has been providing the highest quality of personalised elderly care services for over 30 years. The Pine Care Group has been striving to continuously enhance the quality of its elderly care services with new approaches, fresh innovations, professional insights and the latest technology, and has launched its "Silverage Collection" in recent years. Furthermore, the Group has also set up a consultant team with members having prior rich experience in the planning, design, development and operations of seniors independent living projects integrated with RCHEs and Daycare. With this professional expertise and the experience, the Group is prepared to provide one-stop, holistic, high quality senior living residential facilities with ageing-in-place care services to serve the rapidly expanding ageing community in Hong Kong.
- 1.2.3 Through this project proposal, the Group is leading the way as the pioneer in the private sector to redefine senior living and care solutions with an elevated level of quality. It proposes on an innovative and wide-reaching initiative of an "Age-friendly Community Service Hub" that premises on serving the community and to promote inter-generational integration. The proposed Senior Hub, being self-financed, will provide elderly accommodations, high-quality RCHE(s) services and accessible supporting facilities and social activities to foster "ageing in place" under one single roof of the proposed composite development. At the same time, the Hub also aims to foster an inclusive, caring, harmonious and socially diverse neighbourhood where the elderly are able to enjoy healthy and active ageing through a wide variety of programmes and community support services offered.

1.3 Intended Minor Relaxation

- 1.3.1 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 Plot Ratio (PR) and Site Coverage (SC) of 2.1 and 17.5% respectively (for BH over 33m), and a maximum BH of 60mPD.

- 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.

2 Site Context

2.1 Local Site Context

2.1.1 The Site with a site area of about 3,306m², including about 1,402m² (42%) of government land (**Figure 1 and Figure 2**), situated within the residential area. It is observed with the following site characteristics:

- i. The Site is a vacant land which is generally flat and surrounded by the Yale Villa – Hong Kong Garden to the north (zoned “R(B)1”), Hong Kong Garden to the west (zoned “R(B)1”) and Hong Kong Garden Commercial Complex to the east (zoned “C”).
- ii. The Site is abutting Castle Peak Road – Tsing Lung Tau to the south, which is partly covered by a semi-closure noise barrier. There is currently no proper vehicular ingress/egress point to the Site. There is an existing Highway Department’s footbridge (NF437) across Castle Peak Road providing pedestrian linkage between the waterfront and inland.
- iii. The Site is bounded by a platform (with formation level of 12.2mPD) to the north, a backlane of Hong Kong Garden’s commercial complex to the east and a man-made slope (6SW-D/C 408) within Hong Kong Garden to the west; and
- iv. The Site is vegetated with trees mainly located along the western boundary.

2.2 Surrounding Area of the Site

2.2.1 The surrounding areas have the following characteristics:

- i. Tsing Lung Tau is generally characterised by medium-rise and medium-density residential developments, with a group of high-density residential developments along the coast (zoned “R(A)”); and
- ii. To the immediate west, north and east is the Hong Kong Garden comprising residential towers with a stepped building height profile (120mPD, 95mPD, 90mPD and 60mPD). To the immediate east is the 3-storey Hong Kong Garden Commercial Complex (zoned “C”).

2.3 Land Status

2.3.1 A land exchange is currently in progress in accordance with the previously approved residential development (A/TWW/122). In the event of approval by the TPB, it will be required to apply to Lands Department (LandsD) for a land exchange/lease modification to facilitate the proposed composite development.

2.3.2 It is noted that the Applicant will apply for the *Incentive Scheme – Time-limited Enhancements* (**Appendix 1**) and the LandsD may grant the following concessions (collectively “the Concessions”):-

- 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.

3.2 Non-Statutory Planning Context

3.2.1 *Scheme to Encourage Provision of Residential Care Home for the Elderly Premises*

3.2.1.1 In the 2023-24 Budget, it was announced that the Government would not only continue to exempt the GFA of eligible private RCHEs from premium payment, but would also increase the GFA that can be exempted for each development project to incentivize the private market to provide purpose-built premises for RCHEs. These enhanced measures are introduced in Practice Note No. 5/2023 issued by the Lands Department and are being implemented as part of a three-year under the *Incentive Scheme – Time-limited Enhancements* pilot period from 20 June 2023, to 19 June 2026.

3.2.1.2 On 12 June 2023, the Panel on Welfare Services of the Legislative Council held further discussions³. The main points of the discussion are summarized below:

- i. The Development Bureau (“DEVB”) added that relevant Government departments, including the Buildings Department, the Lands Department (“LandsD”) and the Planning Department, would implement streamlined administrative procedures in tandem, wherever possible, to facilitate applications and expedite process.
- ii. DEVB would also provide guidance to individual developers in their development projects if necessary.
- iii. In response to Members’ suggestion of attracting more developers to participate in the Scheme by increasing the plot ratio for small private development projects, DEVB explained that **developers could apply to the Town Planning Board for a change of plot ratio for their development sites**.
- iv. LWB advised that to place parts of the RCHE used for dormitory purpose 24 metres above the ground, the RCHEs should comply with additional management and building fire safety requirements.
- v. LWB would impose additional requirements for private RCHEs participating in the Enhanced Bought Place Scheme (“EBPS”) on requirements such as staffing and equipment which would be reviewed from time to time. It would be a commercial decision for private RCHEs to incorporate gerontechnology products to meet their operational needs and to enhance their service quality.

3.2.1.3 As explained by DEVB, the Government's policy is aimed at encouraging private developers in utilizing their market influence to create more high-quality premises for RCHE and meet the diverse demands of the community. **Developers are encouraged to increase the plot ratio of their private development projects**

³ Source: LC Paper No. CB(2)729/2023

<https://www.legco.gov.hk/yr2023/english/panels/ws/minutes/ws20230612.pdf>

by applying applications to the Town Planning Board (TPB) to incorporate RCHE(s) development within the buildings. Please be invited to note that this intended Section 16 planning application is tailored made and prepare in timely response to the government policy to increase quality RCHE GFA in Hong Kong.

3.2.2 *Surging Demand for RCHEs*

3.2.2.1 With the rapidly ageing population in Hong Kong, the foreseeable risk of pressing demand for elderly services and residential facilities has been a focus of wide range of policy initiatives. According to the Census and Statistics Department's population projection, the percentage of elderly persons aged 65 and above in the total population will gradually increase from 20.8 per cent in mid-2022 to 26.9% by 2030 and 31.6% by 2040 and 33.6% by 2050.

3.2.2.2 In light of these demographic projections, it becomes crucial to assess the current availability of RCHEs beds. With reference to the official statistics from Social Welfare Department (SWD) as at 31 December 2023⁴, there are about 79,000 RCHE beds. Of these, 70% are provided by private sector. As at 31 January 2024, there are about 16,756 elderly persons on the waitlist for subsidized long-term care services, with an average waiting time of 8-12 months. These figures underscore the urgency of ensuring a sufficient supply of private RCHE places in the market to meet increasing future demand. It is essential to address the pressing demand for elderly services, and residential and daycare facilities, considering the projected increase in our elderly population over the coming years.

3.2.3 *Community Care Service Voucher for the Elderly*

3.2.3.1 The Government has been consistently working towards improving elderly services, focusing on both quality and quantity under the policy regime of "ageing in place as the core, with institutional care as a backup."

3.2.3.2 In 2013, the SWD launched the Pilot Scheme on Community Care Service Voucher (CCSV) for the Elderly. This scheme allows eligible elderly persons to use CCSVs to purchase suitable community care services from Recognised Service Providers (RSPs) under the "money-following-the-user" funding mode. The Scheme has been implemented in three phases: Phase 1 in September 2013, Phase 2 in October 2016, and Phase 3 in October 2020. Since the implementation of the first phase of the Scheme in 2013, the public has gained a deeper understanding of the Scheme and the number of CCSV users gradually increased from about 1 000 at the end of the first phase to about 7377 in July 2023⁵.

⁴ Source: 2022-23 Annual Service Provision and Statistics
https://www.swd.gov.hk/en/pubsvc/elderly/elderly_info/elderly_ah_sps/elderlysp/rcse/

⁵ Source: Regularisation of Pilot Scheme on Community Care Service Voucher for the Elderly
<https://www.info.gov.hk/gia/general/202309/01/P2023083100318.htm?fontSize=2>

3.2.3.3 In the Chief Executive's 2022 Policy Address, the Government announced the regularisation of the Pilot Scheme on CCSV in the third quarter of 2023 to further support elderly individuals in ageing in place. The regularised CCSV Scheme was implemented on 1 September 2023, with an increase in the number of beneficiaries from the existing 8,000 to 10,000 in 2023/24 and further to 12,000 in 2025/26, responding to the high demand for community care services.

3.2.3.4 Any non-subsidised RCHE that meet the space standard, staffing requirements as well as specified track record criteria are eligible to apply as RSPs. The Applicant, with the expertise and resources of the Pine Care Group, will be eligible to apply for participating in the Scheme⁶ when fulfilling the following criteria in the proposed RCHE development:

- i. Providing residential care services for elderly persons under a Government contract awarded through open tender;
- ii. Private RCHE(s);
- iii. Have an Area of Floor Space of at least 9.5m² for each resident;
- iv. Be providing non-subsidised residential care service places; and
- v. Meet the minimum staffing requirements as specified in Annex I of the Service Specifications

3.2.3.5 Given this context, the Applicant intends to develop an "Age-friendly Community Service Hub" that not only offers residential care services and more housing options for the elderly with different care levels, but also providing centre-based day care services to elderly persons from the community. The aim is to promote active and healthy ageing, help the elderly maintain independence for as long as possible via preventive health and health screening, allowing them get around and get on with their daily activities safely, offer early intervention and outreaching care services and readily available whenever needed, and age within their own familiar homes and neighbourhoods. This will also help reduce the healthcare burden on HK Government services, if seniors can age in place for as long as possible.

3.3 Previous Planning Application

3.3.1 The Site is the subject of a previous planning application (No. A/TWW/122) for proposed minor relaxation of PR from 2.1 to 2.52 (+20%) for a permitted residential development, which was approved with conditions by the Committee on 12 August 2022, mainly on the considerations that:

- i. The proposed development generally follows the policy objective of increasing flat supply;
- ii. It was in line with the planning intention;
- iii. It was not incompatible with the surrounding areas;

⁶ Source: Invitation for Applications Residential Care Service Voucher Scheme for the Elderly (Recognised Service Providers)
[https://www.swd.gov.hk/storage/asset/section/22/en/IOP8_of_RCSV_\(Open_Invitation\)_\(eng\)_3-1-2024.pdf](https://www.swd.gov.hk/storage/asset/section/22/en/IOP8_of_RCSV_(Open_Invitation)_(eng)_3-1-2024.pdf)

- iv. It has incorporated various design merits in support of the relaxation of PR sought; and
- v. There were no adverse comments from concerned government departments.

3.3.2 The current application is submitted by the same Applicant for incorporating RCHE(s) development with the permitted flat use under one roof in pursuit of the *Incentive Scheme – Time-limited Enhancements*. The proposed minor relaxation of PR and SC aims to respond to the growing demand for quality RCHE(s) and pursuant to the latest policy initiative.

3.3.3 With a genuine intention to minimize the visual impact, the Applicant will propose the PR for the permitted residential development at 2.1 (instead of the recently approved PR at 2.52).

3.4 Similar Planning Application(s)

3.4.1 There is a similar S16 application that seeks a minor relaxation of PR and SC in accordance with the Government Policy. This application is for the same zoning and falls under the same OZP. Please refer to the **Table 1** below.

Table 1 – Minor Relaxation of PR and SC in R(B) zone under the same OZP

Case No.	Application	Planning Justifications
A/TWW/107 (Approved on 16/08/2013) R(B) Zone	Proposed Minor Relaxation of Plot Ratio and Site Coverage Restrictions for Permitted “Residential (Group B)” Development [PR from 2.1 to 2.52 SC from 17.5% to 20.2%]	<p>✓ The proposed minor relaxation was to <u>optimise the utilisation of scarce land resources and meet the general housing demand</u> in the Territory. The proposed development restrictions were based on a layout testing, which had taken account of various factors including urban fringe character, the waterfront setting, the existing stepped building height profile of Tsing Lung Tau area, the existing BH restrictions of 60mPD of the site, building setback and requirements of the Sustainable Building Design Guidelines. <u>There was no change to the BH.</u> The difference in the indicative block layouts under the proposed and current restrictions was negligible. The proposed increase in PR and SC could be regarded as minor;</p> <p>✓ The applicant demonstrated that there would be no significant difference in the resultant visual effect under the current and proposed development restrictions. <u>The proposed increase in development intensity was considered compatible with the visual context of the surrounding area.</u> On air ventilation aspect, based on the Expert Evaluation on Air Ventilation Assessment for the Tsuen Wan</p>

		<p>West area, <u>the application would not cause air ventilation problem to the surrounding area;</u></p> <p>✓ According to the Chief Executive’s 2013 Policy Address, the Government was committed to increasing flat production to meet the housing demand. Development intensity of unleased and unallocated residential sites should be increased as far as allowable in planning terms. The application to increase development intensity through minor relaxation of the development restrictions would achieve the policy objective of increasing flat supply to meet the public demand for housing, which was in the public interest. The proposed minor relaxation to increase flat supply was in line with Government policy and had planning merits.</p> <p>(Extracted from the Minutes of 495th Meeting of the MPC on 16/08/2013)</p>
--	--	---

3.4.2 There is also a similar S16 applications that seeks a minor relaxation of PR for proposed composite developments that include both flats and social welfare facilities in different OZP. It is relevant to the current application. Please refer to **Table 2** below.

Table 2 – Minor Relaxation of PR in Residential Zone of Different OZP

Case No.	Application	Planning Justifications
<p>A/YL/304 (Approved on 22/12/2023) <u>R(E) Zone</u></p>	<p>Proposed Minor Relaxation of Plot Ratio and Building Height Restrictions for Flat with Shop and Services/ Eating Place and Social Welfare Facility Uses</p> <p>[PR from 5 to 6 and BH from 85mPD to 100.75mPD]</p>	<p>✓ In this regard, the proposed uses are generally <u>in line with the planning intention at the “R(E)2” zone and the applicant has proposed various environmental mitigation measures</u> such as acoustic window, enhanced acoustic balcony, fixed glazing and noise barrier to address the environmental and I/R issues, and DEP has no in-principle objection to the application.</p> <p>✓ The proposed relaxation of domestic PR restriction from 5 to 6 (i.e. 20%) <u>echoes with the PA 2022 on adopting a higher PR in the Northern Metropolis</u>, which can contribute to the housing supply.</p> <p>✓ As for the BH, the applicant proposes to relax the BH restriction from 85mPD to 100.75mPD (i.e. +18%), and to adopt a stepped height design for Tower 2 from 91.3mPD to 97.6mPD and 100.75mPD along southeast to northeast direction of the Site to enhance visual interest to the urban skyline. Considering the BHs of</p>

		<p>the existing developments in TTIA with maximum up to about 96mPD, and Yuen Long Town Centre to the south of the Site which is predominated by high-rise residential developments near Long Ping MTR Station with BH up to about 109mPD (Plan A-1), <u>CTP/UD&L advises the proposed development is not incompatible with the surrounding developments.</u> She also advises that the proposed minor relaxation of BH restriction will only result in slightly adverse visual impacts when compared to the permissible BH of 85mPD on the OZP. In this regard, both CA/CMD2, ArchSD and CTP/UD&L have no adverse comment on the application from architectural and urban design perspectives.</p> <ul style="list-style-type: none"> ✓ Various design measures proposed in the s.12A application stage have been maintained at the proposed development, including a 15m-wide building separation between the two residential blocks towers as wind corridor, an 1.5m full-height setback along Wang Yip Street East and an at-grade open space along Po Yip Street. In this regard, CTP/UD&L considers the proposed measures would help to mitigate the potential visual impact, improve pedestrian environment and provide visual integration with the nearby open spaces. ✓ The proposed development would <u>provide two GIC facilities, including a Main-base of STFAST and HCS for Frail Elderly Persons (2-team size non-kitchen based), to serve the local community.</u> The applicant proposes that the floor spaces dedicated for those GIC facilities as required by the Government may be discounted from PR calculation. DSW has no comment on the application in this regard. ✓ The Chairman suggested and Members agreed to include an additional advisory clause to request the applicant to improve the building layout and design of the proposed development for better air ventilation, in particular at the Keung Yip Street Rest Garden, during the detailed design stage. <p>(Extracted from the Minutes of 733rd Meeting of the RNTPC on 22/12/2023)</p>
--	--	--

3.4.3 The subject proposed composite development is designed to leverage market forces and innovations in quality, to join hands with the Government for meeting the community needs timely. Sufficient car parking spaces are provided for the convenience of visiting family members of the elderly. The RCHE(s) design adheres to the practices recommended by the SWD and includes ample open spaces and greenery for elderly to use. The subject application shares similarities with the abovementioned approved applications in the following aspects:

- ✓ Enhance the efficient utilization of limited land resources and address the pressing demand for elderly care and suitable residential needs;
- ✓ Compatible with the surroundings context of the site which is of residential urban fringe character;
- ✓ Policy intention to incorporate RCHE premises in private development and maintaining the same GFA and BH for the residential (flats) development;
- ✓ Insignificant effects on the visual character of the surrounding townscape; and
- ✓ No technical impacts arising from the proposed composite development are anticipated.

4 Proposed Development

4.1 Planning Concepts

- 4.1.1 The government has long advocated for "ageing in place as the core, with institutional care as a backup", to strengthen the support for elderly persons with both hardware and software. The proposed composite development aligns with this government standing policy by achieving both goals in a high-quality manner, thereby expanding the range of residential options and services available to the elderly. It can serve both those with more significant physical and mental needs, as well as independent living options for the able-bodied elderly.
- 4.1.2 The proposed composite development introduces an innovative and far-reaching initiative with an "Age-friendly Community Service Hub". This initiative aims to create a strong and comprehensive framework and dedicated place for integrated elderly care services and living environment. It will foster an environment where seniors can age gracefully, live happily with dignity and autonomy, and receive professional care and rehabilitation services on site. It will provide high-quality, "one-stop" services for the elderly, including independent living (beds/flats), assisted living (RCHEs), skilled nursing care and rehabilitation. Quality professional services, amenities and designs tailored to the specific needs of the elderly population of different care levels will be provided, ensuring that senior residents can enjoy a sense of well-being, peace of mind, carefreeness and an active fulfilling life.
- 4.1.3 To support "ageing in place", the Applicant is willing to provide community support services (i.e. center-based day care services). The aim is to promote active and healthy ageing, help the elderly maintain independence for as long as possible via preventive health and health screening, allowing them get around and get on with their daily activities safely, offer early intervention and outreaching care services and readily get support whenever needed, and age within their own familiar homes and neighbourhoods. Thereby avoiding premature admission to RCHE(s) and reducing overall healthcare costs in the community.

4.2 Proposed Scheme

- 4.2.1 The Applicant plans to pursue the *Incentive Scheme – Time-limited Enhancements* by developing quality RCHE(s) with a total GFA of 12,000m² within its private development, which shall be exempted from GFA calculation under the policy. In addition, the upper portion of the development is designated for senior living (Flat).
- 4.2.2 The schematic plans and section are provided in **Appendix 2**. The key development parameters are set out in the **Table 3** below.

4.2.3 Major Amenities

- 4.2.3.1 The proposed RCHE(s) (G/F to 7/F) is specifically intended for "Assisted Living". It is tailored to provide day-to-day residential aged care services, nursing care services and rehabilitation to elderly who require continuous and seamless care as their physical and mental conditions change over time. A portion of the 2/F area is designated as a training centre with residential institution.
- 4.2.3.2 The permitted Flat (8/F to 15/F) is intended for "Independent Living". These units are designated for elderly who are more capable of taking care of themselves independently. It offers such seniors an alternative housing option (integrated with care services) for seniors in the private market, which is currently underprovided.
- 4.2.3.3 The disposition and layout of the composite development have been carefully designed to consider the site configuration and the surrounding environment. To enhance landscaping opportunities and create a leisure-oriented environment, the development has been set back from the eastern, western and northern boundaries of the Site. The podium garden on 8/F clearly separates the areas designated for the RCHE(s) and other flat uses. The clubhouse, which is exempt from the calculation of GFA pending decisions by the Building Authority (BA), as well as the swimming pool, are designed specifically for the flat residents' use.

4.2.4 Vehicular and Circulation Arrangement

- 4.2.4.1 The application boundary and location of ingress or egress (XYZ) to or from the Site for the passage of motor vehicles adhere to the last approved S16 application A/TWW/122. A drop off area and a loading/unloading area are designed on G/F. A floor of basement is designed to provide sufficient private vehicle car parking spaces for both residents of the RCHE(s) and the flats. These parking spaces are provided in accordance with the Hong Kong Planning Standards and Guidelines (HKPSG) to meet the needs of the operation and users.
- 4.2.4.2 There are two separate entrances designated for RCHE(s) and flats to avoid interfacing problems. Separate lift lobby designated for RCHE(s) and residential development are provided on G/F.

4.2.5 Planning and Design for Well-being

- 4.2.5.1 The Applicant, who is also the owner of the Hong Kong Garden Commercial Complex (HKGCC) to the adjacent east of the Site, plans to make good use of this locational advantage to create a well-served neighbourhood. With the planned footbridge on 2/F, the commercial complex of the HKGCC will offer the future residents a convenient place for consuming groceries and daily necessities with varieties, and encourage social interactions as a communal space of the community. The lease arrangements and technical aspects will be investigated at the later stages.

4.2.6 **Set Back Area**

4.2.6.1 A 1.7m to 2.4m-wide landscaped setback area (about 126m²) within the Site fronting Castle Peak Road to form part of the existing public footpath is proposed. Tall shrubs and at-grade planters will be provided within the setback area to enhance the environment and pedestrian walkability.

4.2.7 **Relocation of Footbridge**

4.2.7.1 There is an existing Highway Department's footbridge (NF437) across Castle Peak Road providing pedestrian linkage between the waterfront and inland. Same as the previous planning application (No. A/TWW/122), it is proposed to modify the alignment of the footbridge ramp such that the new vehicular ingress/egress can be provided at the south-eastern corner of the Site to meet the sightline requirement without affecting the noise barrier and to provide adequate distance from the existing bus stop.

4.2.7.2 It is well noted that the Applicant shall be responsible for the erection of temporary direction signs and guiding pedestrians during the lift maintenance and inspection period. Temporary traffic management will be submitted to relevant parties for vetting and approval in good time prior to the proposed works implementation.

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 m ²
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.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.

4.3 Proposed RCHE(s)

- 4.3.1 The proposed RCHE(s) is designated from G/F to 7/F in the composite building to optimise the development potential according to the policy initiative of the *Incentive Scheme – Time-limited Enhancements* and in response to the pressing societal need for residential care service across the territory. With reference to the Practice Note, the proposed RCHE(s) can be managed and operated by more than one licensed RCHE operator.
- 4.3.2 A designated area on the 2/F is allocated for a non-standard provision of a Training Centre with Residential Institution. The integration of a Training Centre with Residential Institution within the RCHE area represents an innovative and forward-thinking approach to elderly care and healthcare education. The Applicant will invite and collaborate with relevant professions and/or educational institutions to implement this concept. The objective is to enhance the quality of care through on-site, practical training for caregivers and allied health professionals. By bridging the gap between classroom learning and real-world application, the facility offers students unique opportunities to apply theoretical knowledge in a practical setting. The ancillary dormitory enables crucial night shift training. Furthermore, the facility serves as a platform for research and innovation in gerontology. By combining training and care facilities, this cost-effective model maximizes resource utilization, providing mutual benefits to both the RCHE and educational institutions. Ultimately, this holistic approach not only enhances elderly care quality but also plays a crucial role in developing a skilled and well-prepared workforce for the future of elderly care.
- 4.3.3 The proposed RCHE(s) would duly comply with the licensing requirements as stipulated in the Residential Care Homes (Elderly Persons) Ordinance, Cap.459, its subsidiary legislation and the Code of Practice of Residential Care Homes (Elderly Persons). All requirements of the *Incentive Scheme – Time-limited Enhancements* as set out in the Practice Note would be complied with. It is well noted that all the facilities provided for elderly will be situated at a height of not more than 24m above ground level, measuring vertically from the ground of the building to the floor of the premises. The floor spaces from G/F to 7/F are used for dormitory purpose which situated at a height of 24m above the ground floor (i.e. 29.2mPD – 5.2mPD).
- 4.3.4 All kinds of necessary functions rooms will be provided with reference to the requirement of the Schedule of Accommodation for RCHE(s), including disabled toilets, laundry room, kitchen, staff rest room, staff toilets, staff changing room, office, interview room, nurse station, sick/isolation/quiet room, multi-functional room, living room and dining room, etc. Natural lighting and ventilation will be provided for habitation area, including but not limited to the dormitory, end-of-life care room and sick/isolation/quiet room etc. Please refer to the **Appendix 3 – RCHE SoA Table**.

4.4 Permitted Flat

- 4.4.1 Flats are provided from 8/F to 15/F which targets mainly to serve those seniors who are capable of living independently without the need for higher level care and attention. It offers an accommodation option for the elderly to maintain independence for as long as possible. Elderly-friendly design will be adopted to 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.
- 4.4.2 Subject to detailed design, a relatively larger unit (average unit size of about 41m² GFA) and elderly-friendly design in unit layout have been proposed to cater for their residential needs, that is suitable for elderly daily life activities and functionality. A balcony design is designated in every single unit for their leisure uses and promote healthy living. The flats are spatially separated from the RCHE(s) use.

4.5 Planning and Design Merits

4.5.1 “One-stop” Integrated Elderly Community

- 4.5.1.1 The “Age-friendly Community Service Hub” serves the well-being of elderly residents all in one neighbourhood, including accessible healthcare services, inclusive and supportive social network, daily necessities, rehabilitations, recreation, etc. It presents a new innovative model reflecting and integrating multiple government policies of providing quality RCHE services, ageing in place, with institutional care as backup and offering an alternative senior housing option.

4.5.2 Healthy Multi-level Green Trail for the Elderly

- 4.5.2.1 The development features an accessible and age-friendly leisure green trail along both the eastern and western site boundaries, extended from the G/F all the way to 2/F. The continuous trail is specifically designed to encourage seniors to engage in outdoor activities and access to open air conveniently from various floor levels. The trail will play a big part in promoting mobility, mental health, community engagement, friendships, a sense of belonging and the overall well-being of the elderly residents. Safety, comfort, navigability and barrier-free access from the seniors’ perspectives will be a focus in designing the trail.

4.5.3 A Rehab Hub for the Elderly

- 4.5.3.1 A Rehabilitation hub on 2/F is dedicated to rehabilitation services activities and with equipment tailored to the different therapeutic needs of seniors including physical, cognitive, and communicative abilities, thereby promoting their overall functional independence and well-being. With a multidisciplinary team of healthcare professionals on-site, seniors can receive comprehensive care and support on different aspects of their rehabilitation journey.

4.5.4 **Central Garden with Multi-level Green Terraces for the Elderly**

4.5.4.1 A landscaped courtyard located on 3/F has been thoughtfully designed to create a central courtyard garden which senior residents of all care levels can enjoy visually or physically from every level of the building. The courtyard garden features a void that opens up to 7/F and sky, while green terraces are available on 4/F to 7/F, allowing seniors to enjoy outdoor spaces while looking downward to the garden. The visual and sensory stimulation provided by the garden's therapeutic design creates a sense of natural well being and openness and sense of community, which can alleviate feelings of confinement and improve mental health for all. By offering different terraced levels to enjoy the garden view, the design fosters a sense of connection with nature and provides a visually pleasing environment that contributes to the residents' overall well-being.

5 Planning and Development Justifications

5.1 In Line with Planning Intention

5.1.1 The proposed composite development aligns with the planning intention of the “R(B)” zone, which primarily allows for medium-density residential developments. The Site has been left vacant and underutilized for years. By developing a RCHE(s) with residential flats, the potential of the land can be maximized for beneficial uses, including addressing the pressing demand for care home services, promoting “ageing in place” and senior housing options, which the uses are also largely residential in nature as in line with the planning intention. To proceed with the 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, with a genuine intention to deliver a high-quality and purpose-built RCHE(s). The proposed composite development offers a comprehensive residential solution with community facilities that cater to the diverse needs and well-being of the ageing population.

5.2 Compatible with Surrounding Area

5.2.1 The surrounding area is primarily characterized by residential use, along with village type development, GIC and commercial facilities. The proposed composite development, which consists mainly of dormitories and health care services, will be compatible with the residential setting, provide additional community facilities in the neighbourhood and integrate seamlessly into the existing fabric of the neighborhood.

5.2.2 The Tsing Lung Tau area has an upward sloping terrain, where the altitude gradually increases from the waterfront to the hilly areas. The OZP specifies height restrictions that progressively increase from 60mPD at the waterfront, to 90mPD, 95mPD and 120mPD in the uphill areas. The proposed application aims to relax the PR and SC limitations only to cater for the additional floor space required without compromising the planned stepped building height profile of the area.

5.3 Shortage of Quality RCHEs and the Prevailing Policy Support for RCHE(s) with GFA Exemption

5.3.1 The importance of allocating resources to strengthen and enhance elderly services is widely acknowledged by both society and the government. In the market, the supply of private RCHE places is crucial, as it accounts for 70% of the total RCHE bedspaces. Currently, there is a significant demand for subsidized long term care services, with approximately 16,756 elderly individuals on the waiting list. The average waiting time for these services is around 8-12 months. The proposed composite development, aims to address the immediate shortfall in elderly facilities by providing a sufficient number of bedspaces and to age in place in a familiar community.

5.3.2 The *Incentive Scheme – Time-limited Enhancements* permits eligible RCHE premises to be excluded from the total permissible GFA calculation under the lease. With the abovementioned visions of the Group, the Applicant intends to pursue this policy by incorporating the proposed RCHE(s) on the lower portion of the building, with floors for the facilities provided for elderly situated at a height of not more than 24m above ground level. It is aimed to maximize social benefits under the "single site, multiple use" model while maintaining compatibility in terms of planning and technical considerations.

5.3.3 The proposed composite building is suitable for the development of private RCHE(s) in terms of its suitable location and local context. It is designed to leverage market force to join hands with the Government for meeting the community needs timely. The RCHE design adheres to the practices recommended by the SWD and includes ample open spaces and greenery for the elderly use. The intended S16 application is an appropriate way to relax the PR and SC to allow for a faster completion of the proposed composite development in addressing the social needs.

5.4 Providing an Elderly Housing Option Which Helps Diversify the Housing Market

5.4.1 The Government has consistently prioritized increasing the housing supply as a crucial policy. In the Chief Executive's 2023 Policy Address, it was emphasized that ensuring sufficient land and housing supply is essential for making Hong Kong a better place to live and work.

5.4.2 With the number of family households in Hong Kong getting smaller, and increasing number of elderly singletons, many families and single elderly need special aged care support to ensure that their elders receive appropriate care and attention, but whose health and mobility conditions however may not necessarily demand intensive and attentive nursing cares as provided by conventional RCHE(s). The Applicant recognizes the lack of accommodation options provided by the private sector to support elderly of different needs. While the Hong Kong Housing Society has made significant efforts over the years to introduce progressive senior housing projects such as The Tanner Hill and those under the Senior Citizen Residences Scheme, there are still limited players in the private market offering options of integrated senior housing with care that can serve the broader elderly population, despite rising demand.

5.4.3 In light of the demand and provision gap, and the abovementioned visions of the Group, this project present as an opportunity to provide independent living options to meet the demand of this "silver market".

5.5 Promoting "Ageing in Place as the Core, with Institutional Care as a Backup"

5.5.1 The proposed composite development offers a wide spectrum of amenities to support seniors, such as RCHE(s) for "Assisted Living", Flats for "Independent Living". A comprehensive range of services and support tailored to the specific needs of the seniors will be provided ensuring that seniors will have access to

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**.

Table 4: Summary of internal transport facilities for the development

Car Parking Spaces	Proposed Provision
<u>RCHE(s)</u>	
Private Car	16 (including 1 accessible parking)
Light Bus/Ambulance Parking Space	2
<u>Flat</u>	
Private Car	31 (including 1 accessible parking)
Visitor	5
Motorcycle	2
HGV Loading/Unloading Bay	1

5.7.3 A Traffic Impact Assessment (TIA) has been conducted to examine the traffic and pedestrian impact on the local road network in the vicinity of the subject site. Please refer to the **Appendix 5 – Traffic Impact Assessment**. It is concluded that the proposed development will result in no adverse traffic impact to the surrounding road network.

5.8 No Adverse Environmental Impacts

5.8.1 An Environmental Assessment (EA) has been conducted to evaluate the potential environmental noise, air quality impact and risk of land contamination. Please refer to the **Appendix 6 – Environmental Assessment**.

5.8.2 Potential Chimney Emission

5.8.2.1 The surrounding is residential in nature and no industrial use identified in the vicinity, where no chimneys are found within 200m distance from the Site. Hence, no adverse air quality impact from industrial emission is anticipated.

5.8.3 Potential Vehicular Emission

5.8.3.1 For local road traffic, with reference to the Annual Traffic Census 2022 published by the Transport Department (TD), Castle Peak Road – Tsing Lung Tau is classified as a rural road. There is no specific buffer requirement for rural road under the HKPSG. As conservative approach, 10m buffer distance (equivalent to District Distributor) from the road kerb of the Castle Peak Road – Tsing Lung Tau, to the boundary of the proposed composite development, is adopted. In addition, the Tuen Mun Road to the further north of the Site, which is classified as an expressway, is situated more than 20m away from the air-sensitive uses of the proposed composite development. Other local carriageways serving Hong Kong Garden is situated more than 5m (equivalent to Local Distributor) away from the air-sensitive uses of the proposed composite development. Therefore, no adverse air quality impact from vehicular emission is anticipated.

5.8.4 Potential Air Impact During Construction Stage

5.8.4.1 During construction stage, construction dust and gaseous emissions from construction equipment and vehicles are possibly generated. Dust control

measures as stipulated under the Air Pollution Control (Construction Dust) Regulation, together with proper site management and good housekeeping, will be implemented to minimize potential fugitive dust impact during construction stage. In addition, under the Air Pollutant Control (Non-road Mobile Machinery) (Emission) Regulation, only approved or exempted non-road mobile machinery are allowed to be used in the Site.

5.8.5 Potential Noise Impact

5.8.5.1 Road traffic would be the major source of noise nuisance during the project operation. Habitable rooms that rely on the openable window for ventilation are considered to be noise sensitive receivers (“NSRs”) of traffic noise impact. The main sources of noise are the traffic generated on Castle Peak Road – Tsing Lung Tau and Tuen Mun Road.

5.8.5.2 Taking into account the existing semi-enclosure cantilever noise barriers along Castle Peak Road – Tsing Lung Tau as well as others buildings of Hong Kong Garden providing noise screening effect, the residual impact, if any, can be practicably mitigated by noise mitigation measures such as acoustic window/enhanced acoustic balcony. It is anticipated that there will be no adverse impact arising from the road traffic after mitigations.

5.8.5.3 Based on the noise survey, there is no industrial use in the surrounding. Yet, fixed noisy equipment such as HVAC of the adjacent Hong Kong Garden Commercial Complex at its rooftop is identified. As communicated with the management company representative of these identified noisy equipment, it is agreed that the management company would conduct appropriate retrofitting work to control noise generation so that future development at the application site would not be subject to any unacceptable noise impact by-law.

5.8.6 No Change to Potential Land Contamination Issue

5.8.6.1 In the last approved planning application A/TWW/122, it was found that the Application Site was occupied as acid factory before and used for open storage as well without details. There is also no information suggesting the use of unknown building structure identified in aerial photo. In addition, information of chemical producer, accident records, etc. are still pending up to the report submission date. Therefore, further Land Contamination Review/ Assessment was recommended to be submitted to EPD in later stage. After approval of the planning application A/TWW/122 and up to present, the Application Site is still abandoned and there is no further update of uses. The previous recommendation to conduct further land contamination review/assessment is still applicable. Construction works or development of the Subject Site shall be commenced before the approval of the Land Contamination Review / Assessment from EPD.

5.9 No Adverse Drainage Impact

- 5.9.1 A Drainage Impact Assessment (DIA) has been conducted to assess the potential drainage impact as a result of the proposed development. Please refer to the **Appendix 7 – Drainage Impact Assessment**.
- 5.9.2 A new stormwater terminal manhole (STMH-1) will be constructed at the south west of the Site to collect the surface runoff from the Site. A diameter 450mm drainage pipe would be constructed to connect with the existing government stormwater manhole SSH4000781. Assessment is updated based on the latest DSD Stormwater Drainage Manual Corrigendum No. 01/2024 & 02/2024 where applicable. Based on the DIA results, the existing and proposed drainage system will have adequate capacity to cater for additional flow from the Application Site after development.

5.10 No Adverse Sewerage Impact

- 5.10.1 A Sewerage Impact Assessment (SIA) has been conducted to assess the potential sewerage impact as a result of the proposed development. Please refer to the **Appendix 8 – Sewerage Impact Assessment**.
- 5.10.2 The sewage generated from the Site will be discharged to manhole no.: FMH4052284 (S1). It is noted that the ramp of the footbridge will be relocated to southeast corner outside the Site and will be on top of the proposed connection. As advised, the supporting structure will be designed to take into account the proposed alignment of the sewer and avoid any conflict.
- 5.10.3 Based on the SIA results, it is found that the capacity of some of the existing sewerage sewer would not be sufficient to cater for the sewage generation from the proposed development and nearby catchment areas. Upgrading works of sewers from diameter of 500mm to diameter of 600mm will be required.
- 5.10.4 It is anticipated that the sewerage system after upgrading will have adequate capacity to cater for the proposed development and the nearby catchments. Therefore, no adverse sewerage impact arising from the proposed development is anticipated.

5.11 No Significant Air Ventilation Impact

- 5.11.1 An Air Ventilation Assessment – Expert Evaluation (AVA-EE) has been conducted to evaluate if the proposed development would have any impact on the overall air ventilation performance of the assessment area by comparing the Proposed Development of current proposal with the approved scheme in previous planning application (No. A/TWW/122) Please refer to the **Appendix 9 – Air Ventilation Assessment – Expert Evaluation**.
- 5.11.2 Similar to the scheme in the approved planning application A/TWW/122, the current proposal is designed to incorporate good design measures to enhance

its air ventilation performance where practicable. Yet, since there is a limit of maximum height/floors that RCHE can be allowed, and special design with internal courtyard is necessary to protect habitable room (for medical consultation purpose) which otherwise cannot comply with the stringent noise standard (L10(1hr) 55dB(A)), the footprint of the RCHE cannot be further reduced. Nevertheless, building setback from site boundary at lowest 3 levels (pedestrian level) (at least 3m from northern boundary, about 4.5m from east/west boundaries, more than 9m from southern boundary at lower portion) is allowed. At higher elevation, L-shaped block is adopted to vacate the southwest portion so that summer prevailing southeasterly wind can pass through the Application Site. With the proposed design measures in place, the current proposal would unlikely impose significant impact on the surrounding sites from air ventilation perspective.

5.12 No Adverse Landscape Impact

- 5.12.1 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. The proposal states that 20 existing trees will be felled, and a minimum of 30 new trees will be planted within the Site. The compensation ratio to the tree lost in term of quantity is 1:1.5. Further details regarding the species and sizes of the compensatory tree planting will be formulated during the detailed design stage.
- 5.12.2 The proposed private open space will be provided at a ratio of at least 1m² per person according to HKPSG. The greenery area provided is no less than 20% as per the PNAP APP-152. The landscape design aims to provide a high-quality living environment for the seniors while preserving and enhancing the existing landscape context.

6 Conclusion

6.1 This section 16 planning application is submitted to seek planning permission from the 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.

6.2 The TPB is cordially invited to note that the Applicant has a genuine intention to redefine senior living and care solutions, with the aim of continuously enhancing the quality of elderly care services. This proposal aligns with the prevailing town planning context and supports multiple policy objectives of the Government. The proposed minor relaxation of PR and SC for proposed RCHE(s), Training Centre with Residential Institution and permitted Flat is justified based on the following planning grounds:

- ✓ In line with the planning intention of R(B) zone;
- ✓ Not incompatible with surrounding land use nature, development scale and intensity;
- ✓ Leverage market force to join hands with the Government for meeting the community needs timely;
- ✓ Strengthen the role of private sector for the provision of wider range of elderly accommodation options with services and support to meet the demand of “silver market” ;
- ✓ Echo with the policy of “age in place with institutional care as backup” ; and
- ✓ No adverse visual, traffic, air, noise, drainage, sewerage, land contamination, air ventilation and landscape impacts as a result of the proposed development.

6.3 The proposal is comprehensively 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.