

Date : 24th March, 2025
Our Ref. : ADCL/PLG-10298/L007

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

By Email

Dear Sir/Madam,

**Section 16 Planning Application for Proposed Minor Relaxation of Plot Ratio and Building Height Restriction for Proposed Flat and Excavation of Land at Lots 2572 RP, 2573 and 2578 in D.D. 104 and Adjoining Government Land, Ngau Tam Mei, Yuen Long, New Territories
(Planning Application No. A/YL-NTM/476)**

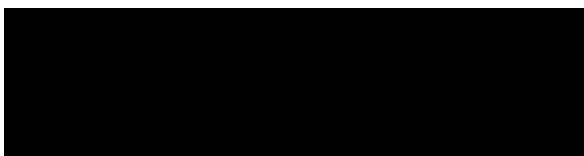
We would like to supplement on the planning merits and justifications of the proposed development under the current application.

Extensive Landscaping and Green Features

- The Applicant intends to undertake extensive landscaping throughout the Application Site, regardless of whether it is required by relevant Government Departments. The proposed development will feature a total greenery area of approximately 968m² to serve the private residential development exclusively. The proposed development achieves a greenery ratio of 48%, significantly exceeding the 20% greenery requirement set out in PNAP APP-152 – Sustainable Building Design Guidelines.
- To further integrate the development with its surroundings, landscaping areas will be provided within the Application Site, complemented by a soft-planted edge at the periphery to enhance visual amenity. The periphery soft planted edge comprises tall roadside trees in association with a minimum 1.8m-tall solid fence wall for screening effect (please refer to the site plan). Compared to the existing conditions, where the surrounding areas are observed with overgrown and unmanaged conditions, the proposed development should significantly enhance the overall landscape and provide visual amenity. The proposed development aims not only to provide a visual retreat but also to enhance the overall microclimate of the area.

Natural and Sensitive Design

- The Applicant is committed to creating extensive landscape and water features at the application site, allowing future residents to enjoy a lush and natural environment at home. By approving the current application, the Application Site—currently used for pot plants—can be transformed into a permanent, verdant landscape. The proposed development also maximises natural lighting and incorporates natural design elements, including a reflective pool is proposed at the southern part of the application site. It is designed to create a scenic reflection of the proposed development and the extensive vegetation at the landscaping area, seamlessly integrating with the existing pond features to the south. The well-designed low-rise residential development is considered fully align with the planning intention of R(D) zone and would upgrade the overall environment.



- The design of the proposed development carefully considers the surrounding area. The Emergency Vehicular Access is located in the western section of the Application Site, with supporting facilities positioned to the east and peripheral planting surrounding the proposed flat development. This proposed configuration creates a buffer that minimizes any visual impact and helps the proposed development integrate the surrounding landscape. Furthermore, the 1.5m voluntary setback from the site boundary, designated as a public passageway, could serve as an additional buffer between the existing pond features located to the east and south of the application site as well as the San Tin Highway. With extensive greenery that will be well-maintained by the Applicant, the proposed development is considered compatible and harmonious with the surrounding landscape.

Serves as a Buffer and Creating a More Harmonious Environment

- The Application Site is currently positioned to serve as a transition and buffer between the San Tin Highway and the adjacent pond located to the immediate east. The proposed development aims to create a seamless transition, acting as a visual barrier that not only enhances the aesthetic appeal of the area while minimizing traffic noise and other disturbances from San Tin Highway. The proposed development promotes a more harmonious environment for both the residents and natural habitats. application for developing low-rise residential development is considered fully in line with the planning intention of R(D) zone.

Fostering a Liveable Community

- While the Application Site is subject to an approved planning application (A/YL-NTM/377) for proposed house development, it is the intention of the Applicant to further optimize land resources and respond to the public call for housing provision by providing more flats in a well-designed and pro-family environment.
- In light of the emphasis on high-standard housing provision, the average flat size of the proposed development is about 77m², in compliance with the latest minimum unit size requirement of at least 26m² promulgated by the Government as from 2022 and respond to the growing public demand for larger living spaces. The proposed development aims to provide spacious living areas and enhance the quality of life for young families in the area. A clubhouse is proposed to offer amenities and promote healthy lifestyles for residents, while the extensive landscaping will create open spaces that encourage a green and low-carbon lifestyle.
- The proposed occupation date is tentatively set for 2028, aligning with the “Hong Kong 2030+: Towards a Planning Vision and Strategy Transcending 2030” initiative, which promotes a “pro-family” environment and advocates active, healthy, and low-carbon lifestyles through suitable urban design.

Provision of Public Passageway and Seating Area

- The Applicant has thoughtfully considered the needs of the adjoining neighbourhood by voluntarily providing a public passageway within the private lots and ensuring no access rights associated with the Application Site are jeopardized. To the south of the Application Site, there are currently some agricultural and rural activities, as well as rural paths that allow occupants to access and maintain the farmland and ponds. Nevertheless, there is no direct and proper access from these inner areas to Chun Shin Road.

- To enhance local connectivity and accessibility, the proposed development voluntarily includes a generous setback to accommodate a public passageway of no less than 1.5m that will be freely accessible by the public at all times without fencing (**Figure 6-II** refers). The setback area is about 290m², which constitutes of about 15% of the Application Site area. The setback area will be paved and designated as the new public pedestrian access to Chun Shin Road and provide a safe and convenient access as well as a pleasant walking environment for the surroundings occupants. The proposed public passageway in the current application would also help unlock the development potential and stimulate permanent development or redevelopment in the inner areas, as intended.
- The voluntary setback area for public passageway will be designed, constructed, maintained, and managed by the Applicant at his own expense to ensure a clean and pleasant walking environment. Additionally, the public passageway will enjoy natural shade from extensive planting associated with the proposed development and outdoor lighting will be installed to ensure safety during nighttime. The proposed public passageway is anticipated to be a green walking corridor that creates a visually appealing and comfortable walking environment and contributes to the rural amenity.
- To further enhance pedestrian walking experience along the lengthy Chun Shin Road, a seating area of about 4m² (with a dimension of about 5m x 0.8m), is proposed as an inviting interim resting spot at the Application Site. This seating area will be free of charge and accessible to the public at all times without any fencing, ensuring it remains a welcoming space for all. The seating area would be constructed and well maintained by the Applicant at his own cost.
- The setback area for public passageway and seating area would be open 24/7 daily and fully accessible by the public.

Optimization of Land Resources

- The current application seeks to utilize the residual Government Land along Chin Shin Road to unlock the development potential of the area. The current application has incorporated a setback of about 15% of the Application Site to provide public benefits (about 290m²). By including Government Land in the proposed development, the Applicant can provide the above-mentioned planning merits to the general public while managing the area at their own expense. The Applicant is committed to maintaining the area and will apply to the Lands Department for a land exchange.
- It is noted that the Government Land involved in the current application is subject to an ongoing planning application (A/YL-NTM/475) for temporary use. The Applicant is committed to liaising with the relevant applicant and departments regarding this matter. By allowing the proposed development with the inclusion of residual Government Land, the overall environment would be upgraded, aligning with the planning intentions of the R(D) zone.

No Substantial Increase in Building Bulk and Minimal Visual Impact

- In consideration of enhancing accessibility and pedestrian walking experience through the provision of an extensive public passageway and seating area, which about 15% of the Application Site area is designated for public use, a minor relaxation of the plot ratio (PR) and building height (BH) restrictions is deemed necessary for the proposed development to create spacious living areas and enhance aesthetic greenery. Nevertheless, the proposed development will remain a natural and prestigious low-

rise, low-density residential project, featuring high-quality design that is fully compatible in form and scale with the surrounding developments (**Figure 6-I** and **6-II** refer).

- Although the current application proposes a slight increase in building height, bringing the total height to 10.65m, it should be noted that the actual building height has included a basement carpark of 3.65m. The building height, measured from ground level is only 7 m. As presented in the photomontages (**Figure 6-I** and **6-II** refer), the proposed development is not visually intrusive from pedestrian eye level.
- In addition, the proposed building height is considered not visually intrusive and deemed insignificant when compared to the adjacent approved transitional housing development, which has a building height of 13.35m, measuring from ground level. The overall bulk and visual impact of the building are viewed as minimal and insignificant.
- In terms of building design, the proposed development would incorporate prescribed windows to mitigate potential noise impact and sound-absorbing materials will be utilized to further enhance sound insulation. The Applicant is committed to adopt the aforementioned measure and the proposed mitigation measures would be incorporated in the Building Plan during the Building Plan submission stage.

No Adverse Traffic Impact

- Noting that Chun Shin Road serves as construction access for the Northern Link main link, the Applicant will provide an implementation programme of the proposed development once available and will keep liaison with Highways Department and MTRCL in the future after approval of the current application. Given that the application will be subject to a further time-consuming land administration process (i.e., land exchange) and uncertainty regarding the actual timing, the Applicant is committed to providing an implementation program to facilitate considerations by relevant departments and parties.

No Obstruction to the Fire Hydrant and Control Valve

- Although the fire hydrant and its control valve are included within the Application Site Boundary, they are positioned within the public seating area along Chin Shin Road without any fencing. There is no intention to relocate or obstruct the existing fire hydrant and the existing fire services facilities would be remained and not be affected. Clear access will be maintained, ensuring that maintenance and usage can occur at all times.

No Adverse Traffic Noise Impact

- The proposed development has been carefully designed to mitigate any potential traffic noise from the west. While the Application Site is bounded by a 1.5m footpath as voluntary setback, an additional 6m ramp is designated at the western portion of the Application site, serving as an additional buffer. The flats are arranged at the inner portion of the Application Site, making them less sensitive to noise.
- Furthermore, a solid fenced wall will be installed along the site boundary (excluding the northern portion along Chun Shin Road), with landscape feature such as planters or vertical green will be implemented to provide additional buffer and screening effect. Peripheral trees will be planted along the site boundary (excluding the northern portion along Chun Shin Road) to act as an effective natural barrier.

It is clarified that the Application Site has an existing site level ranging from about +4.3mPD to +4.5mPD. Therefore, land filling work is proposed to be carried out at the application site of about 1.6m in order to serve the proposed development in a “technically feasible” manner. In general, the Application Site would be filled from +4.3mPD to +5.9mPD. The proposed increase in site level seeks to align with the adjoining developments and is deemed necessary to avoid any potential flooding issues.

It is clarified that no filling of the pond is involved under the current application. According to historic photographic records on public domain, there was a pond located at the southern portion of the Application Site and has been dried up and overgrown with weeds since 2010s. Currently, no pond is present within the Application Site. The Current Application seeks minor relaxation of plot ratio and building height restriction for proposed flat and excavation of land only (**Figure 5** refers), and the proposed use is confirmed to be “Proposed Minor Relaxation of Plot Ratio and Building Height Restriction for Proposed Flat and Excavation of Land.”

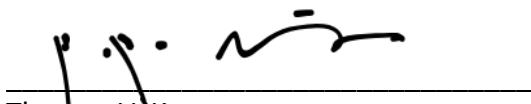
The proposed development involves excavation of land for a basement carpark (3.65m). The proposed excavation area is about 580m² and the depth of excavation is ranging from 2.1 to 3.3m for the site formation of the basement carpark (2.1m) and lift shaft (3.3m). The general depth of excavation for the proposed development sets at 2.1m.

The floor-to-floor height of the roof is about 3m which would be exempted from calculations in accordance with the Joint Practice Note No. 5 “Development Control Parameters Building Height Restriction”.

It is also clarified that the transformer room and switch room are not accountable for GFA calculations.

Thank you for your kind attention and should you have any queries, please do not hesitate to contact our

Yours faithfully,
For and on behalf of
Aikon Development Consultancy Limited



Thomas LUK