

**Proposed Rezoning From “AGR” & “GB” To “G/IC” for  
a Proposed “Social Welfare Facilities” (Residential Care Homes for The Elderly) (RCHE)  
Lot 232 RP, 232 S.A RP, 232 S.A ss. 1 to 14, 232 S.B RP, 232 S.B ss. 1 to 27,  
232 S.C to 232 S.E, 233 RP, 233 S.A to 233 S.M, 237 RP, 237 S.A to 237 S.R,  
239 RP, 239 S.A to 239 S.G in D.D.23, Tung Tsz, Tai Po, N.T.  
S12A Application for Planning Application No. Y/NE-TK/19  
Response-to-Comment – PlanD  
(Updated 19 February 2025)**

Comments	Response
<p><b>1. Comments of the Chief Town Planner/Urban Design and Landscape, Planning Department as follows:</b></p> <p><b>General Comments</b></p> <p>2. The application site (the Site) forms part of a vegetated land in the “AGR” zone interspersed with a few temporary structures, which is sandwiched between two clusters of village houses/low-rise residential developments (with existing BHs ranging from about 6.8mPD to 28.6 mPD/ 1 to 3 storeys) to the east and west, and flanking the marsh at Shuen Wan to the south across Tung Tsz Road and the densely vegetated hillslopes to the north. Being located at the fringe of the “AGR” zone with a village cluster just across its access road on the west, although the proposed RCHE with its BH of 34.5mPD (10 storeys) is comparatively taller than those low-rise residential dwellings and would bring forth some visual changes to its immediate surrounding, it is not considered totally out of context with the rural locality.</p> <p>3. In view of the above, to substantiate the application it would be advisable to provide justifications for the proposed BH and explain whether the proposed SC has been optimized to lower the proposed BH.</p> <p>4. According to the submission, design measures such as building setback up to 5m near the entrance facing the access road, scattered greenery open spaces surrounding the</p>	<p>Noted.</p> <p>Various setback on Plan has been designed to fulfill the prescribed widen requirement under BO. In addition, curtain Greenery would be provided on Privacy Zone to meet SBDG. The Site Coverage of the Plan has been maximized.</p> <p>Noted.</p>

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<p>LG/F and setback on higher floors, etc. are proposed.</p> <p><b>Specific Comments</b></p> <p><u>SPS</u></p> <p>5. According to the submitted development schedule and Section A-A, the BH of the proposed development is 34.5mPD at R/F, and the BH of roof-top ancillary structures (i.e. plant rooms and lift lobby) is not specified. According to the Joint Practice Note No. 5 – Development Control Parameters Building Height Restriction (BHR), for building with height exceeding 30 m, roof-top ancillary structures which exceed 10% of the BH or 15 m (whichever is the less) (or 5.2 m for lift provision) will be counted towards the height of the buildings for the purpose of administering BHR. Your Office may wish to clarify and consider in this regard.</p> <p>6. Section 3.3 - The statement “NO adverse Impact to the Visual Aspect” arising from the proposed development is not supported by the VIA.</p> <p><u>VIA</u></p> <p>7. There are some observations to the accuracy of the photomontages: for example (a) Figure 5 at VP2 – The proposed development should appear to be wider, shorter and shift slightly to the right in the photomontage; (b) Figure 6 at VP3 – The proposed development should appear to be narrower, shorter, and shift slightly to the left in the</p>	<p>The propose BH to main roof is 31m and the roof top structure including. Lift provision is proposed to be 5.2m. According to JPN No.5 S10 II a) i), for the lift provision less than 5.2m, the roof top structure is disregard from BH.</p> <p>Noted.</p> <p>Revised accordingly. Please refer to Figure 5, 6 and 8.</p>

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<p>photomontage; (c) Figure 8 at VP5 – The proposed development should appear to be shorter and shift to the left in the photomontage (i.e. screened by the vegetation at the front).</p> <p>8. With reference to the Town Planning Board Guidelines on Submission of VIA for Planning Applications to the Town Planning Board (TPB PG-No.41) (Para. 4.10 refers), there are deficiencies in the appraisal of visual changes covering the aspects of visual composition, visual obstruction, effect on public viewers and effect on visual resources, which should be substantiated for a proper appraisal of visual changes to support the conclusion of VIA.</p> <p>9. Sections 4 &amp; 5 (VP2 and VP3) - With reference to the photomontages (taking into account our comments in para.7 above), the proposed development would appear as a new built element amidst the rural locality and cause partial obstruction to open sky view and mountain backdrop/ridgeline. As such, please review if it would be more tenable and consistent to grade the visual impact as “slightly to moderately adverse”.</p> <p>10. Sections 4 &amp; 5 (VP5) – With reference to the photomontage (taking into account our comments in para. 7 above), the proposed development would appear to be screened by the vegetation in front and not visible from the VP. As such, it would be more tenable to grade the visual impact as “negligible” rather than “slightly adverse”.</p>	<p>To be revised.</p> <p>Revised accordingly.</p> <p>Revised accordingly.</p>

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11. All proposed visual mitigation measures should be provided in the VIA.	Vertical green wall would be proposed.
12. According to the TPB PG-No.41, “fully acceptable” is not one of the thresholds of the visual impact.	Noted.
13. Figure 3 Viewpoint Location Plan – The extent of the assessment area of the VIA is not shown in the plan.	Revised accordingly. Please refer to Figure 3.



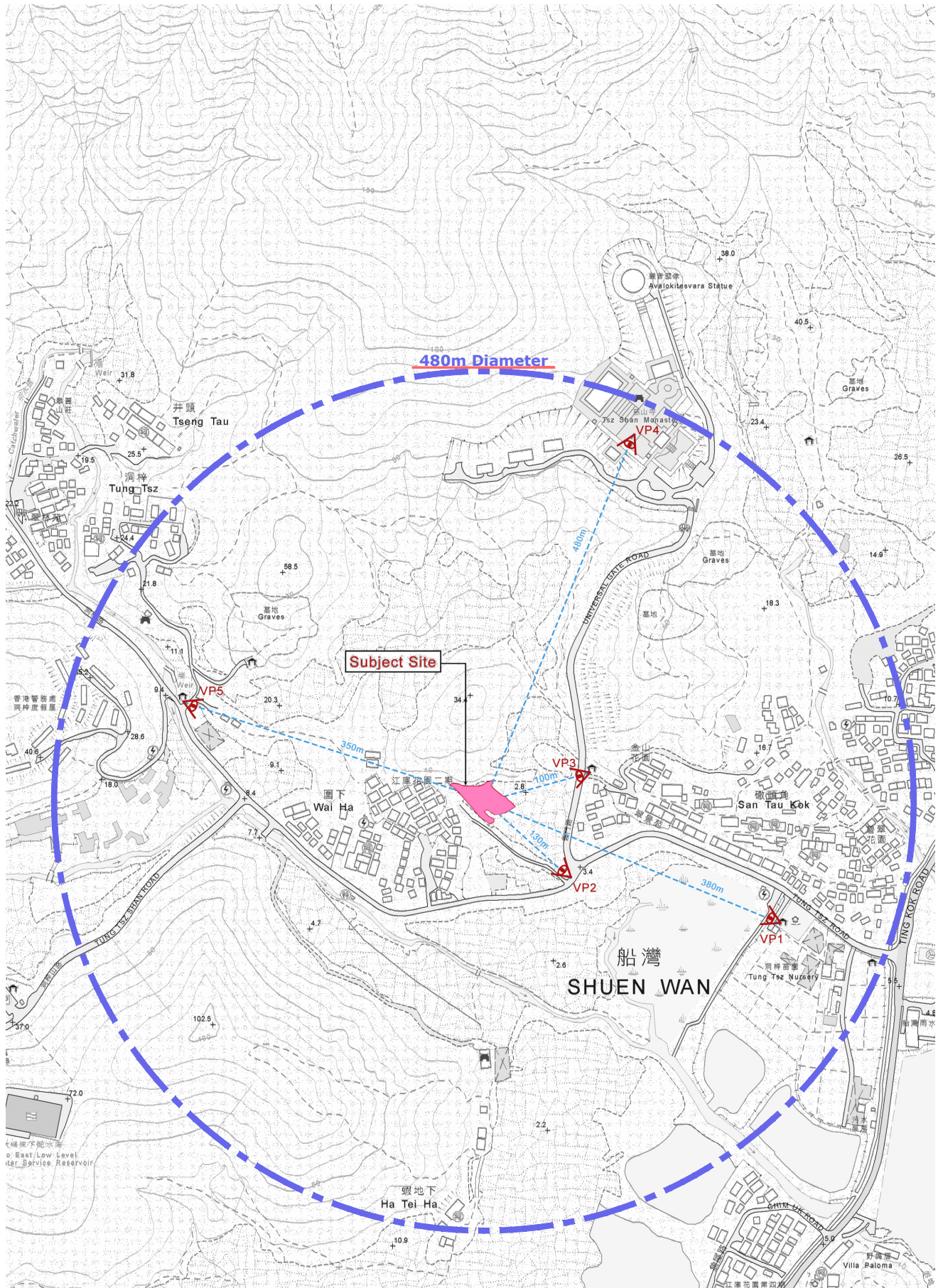


FIGURE NO.

3

TITLE

VIEWPOINT  
LOCATION PLAN

1:6000 (A4)

FEB. 2025

**R LEE ARCHITECTS LTD**







**Existing condition (Scheme A)**



**Proposed development (Scheme B)**

FIGURE NO.

5

TITLE

VIEWPOINT 2

N.T.S. (A4)

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**Existing condition (Scheme A)**



**Proposed development (Scheme B)**

FIGURE NO.

6

TITLE

VIEWPOINT 3

N.T.S. (A4)

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**Existing condition (Scheme A)**



**Proposed development (Scheme B)**

FIGURE NO.

8

TITLE

VIEWPOINT 5

N.T.S. (A4)

FEB. 2025

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4.2 **VP2** : Junction of Access Road and Tung Tsz Road towards North-West (*Figure 5*)

4.2.1 This Medium Range VP2 located South-East of the Site across Tung Tsz Road. It represents the View received by Travellers on foot and by vehicles. Therefore, the visual sensitivity is considered **Medium**. **Scheme B** is visible at the VP.

The Visual Composition comprise a distant view to **Scheme B**, with rows of Village Houses situated to its West. The Hillside to the North, with a hill top level of +34.4 mPD, it serves as a back drop to **Scheme B**.

A significant portion of **Scheme B** is visible in this view point. However, it is softened by heavy vegetation in front and the ridge line to its far back is preserve.

4.2.2 Conclusion :

As a conclusion, the Visual Impact of **Scheme B** would be **slightly to moderately adverse**.



4.3 **VP3** : “慈心亭” along the Universal Gate Road towards South-West (*Figure 6*)

4.3.1 This Short Range VP3 located to the North-East of the Site across Universal Gate Road. It represents the View received by Recreation Users. Therefore, the visual sensitivity is considered **High**. **Scheme B** is partly visible of this View Point.

The Visual Composition comprise heavy Greenery in the front and back. The vegetation partly shields off the Visual Effect.

**Scheme B** is partly visible at this view point. However, the effect is somehow shield off and soften by the Greenery around.

4.3.2 Conclusion :

As a conclusion, the Visual Impact of **Scheme B** would be **slightly to moderately adverse**.

4.5 **VP5** : A Pavilion along Tung Tsz Road towards South-East  
(*Figure 8*)

4.5.1 This Long Range VP5 located on a Pavilion situates at Tung Tsz Road to the North-West about 350 m away from the Application Site. It represents the View received by Recreation Users. The visual sensitivity is considered **High**.

The Visual Composition comprise heavy Greenery in front and **Scheme B** is partly visible in this View Point. This View Point seems to be under-utilized by Residents.

4.5.2 Conclusion :

As a conclusion, the Visual Impact of **Scheme B** compared to **Scheme A** would be **negligible**.





## 5.0 Conclusion

5.1 The Below Table summarize the Visual Impact of Scheme A (vacant Agricultural Land) compared to Scheme B (Proposed RCHE) in the five VPs:-

V.P.	Visual Sensitivity	Visual Impact	Conclusion
VP1: Tung Tsz Road – Shuen Wan Tung Tsz Children's Playground towards North-West	High	Slightly adverse	Slightly adverse
VP2: Junction of Access Road and Tung Tsz Road towards North-West	Medium	Slightly to Moderately adverse	Slightly to Moderately adverse
VP3: “慈心亭” along the Universal Gate Road towards South-West	High	Slightly to Moderately adverse	Slightly to Moderately adverse
VP4: Tsz Shan Monastery towards South-West	High	Negligible	Negligible
VP5: A Pavilion along Tung Tsz Road towards South-East	High	Negligible	Negligible