



DeSPACE (International) Limited

Date: 10<sup>th</sup> February 2025

BY EMAIL

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

Dear Sir/Madam,

**SUBMISSION OF APPLICATION FOR PERMISSION  
UNDER SECTION 12A OF THE TOWN PLANNING ORDINANCE (CAP. 131)**

\*\*\*\*\*

**TO REZONE THE APPLICATION SITE FROM "RESIDENTIAL (GROUP A)" TO  
"RESIDENTIAL (GROUP A)9" FOR PERMITTED FLAT WITH SHOP AND SERVICES AND  
SOCIAL WELFARE FACILITY (RESIDENTIAL CARE HOME FOR THE ELDERLY) USES  
AT LOT NO. 3678 IN D.D. 120, YUEN LONG, NEW TERRITORIES**

**FURTHER INFORMATION (3) – Technical clarifications**

Reference is made to the captioned Section 12A application. In order to address Social Welfare Department's comments regarding the captioned application, attached please the table of responses-to-comments (R to C).

Please be advised that this FI(3) should be exempted from the publication requirement and/or the recounting requirement in accordance with TPB PG-No. 32B since the R to C is only a technical clarification/response to comments of relevant Government department WITHOUT changing the nature of the application, the proposed uses nor the proposed scheme submitted; and does NOT involve major changes in the assumptions and methodologies, findings and proposed mitigation measures of the assessments.

Should you have any queries with this pre-submission, please feel free to contact Mr. Endy CHENG at [REDACTED] or the undersigned at [REDACTED]

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

*P.P.*  
  
Greg Lam



**Section 12A Application to rezone the application site from "Residential (Group A)" to "Residential (Group A)9" and to amend the Notes of the zone applicable to the site (Application No. Y/YL/21)**

Departmental Comments (Email from Planning Department dated 3.2.2025)	
Departmental Comments	Response
<b><u>1. Social Welfare Department (3.2.2025)</u></b>	
<p>In view of the pressing demand for residential care service for the elderly over the territory, the application is supported from social welfare perspective on the conditions that –</p> <ul style="list-style-type: none"> <li>a) The subject RCHEs shall incur no financial implication, both capital and recurrent, to the Government, and</li> <li>b) The design and construction of the RCHEs shall be in full compliance with relevant prevailing Ordinances, Regulations and Codes of Practice enforcing in Hong Kong and any licensing requirement issued by the Social Welfare Department (SWD).</li> </ul>	<p>It is hereby confirmed that:</p> <ul style="list-style-type: none"> <li>a) The subject RCHEs shall incur no financial implication, both capital and recurrent, to the Government, and</li> <li>b) The design and construction of the RCHEs shall be in full compliance with relevant prevailing Ordinances, Regulations and Codes of Practice enforcing in Hong Kong and any licensing requirement issued by the Social Welfare Department (SWD).</li> </ul>
<p>It is noted that the applicant would like to apply for the time-limited enhancements under the Incentive Scheme to Encourage Provision of Residential Care Home for the Elderly Persons in Private New Developments (the Incentive Scheme). Subject to the result of this application of planning permission for the development of RCHE, the applicant shall indicate his intention to join the Incentive Scheme when submitting relevant land transaction application to LandsD. SWD would render comments on the detailed design of the RCHE upon the receipt of LandsD's referral and would seek policy support from LWB on the application when suitable.</p>	<p>Noted with thanks. The applicant intends to and will indicate his intention to join the Incentive Scheme when submitting relevant land transaction application to LandsD.</p>
<p>Upon reviewing the draft layout plan and the schedule of accommodation attached to the captioned application, the following salient</p>	<p>Noted. The Applicant will kindly take note of the requirements, review and revise the schematic design as appropriate during the</p>

<p>design issues of the proposed 170-p RCHE are noted which warrant the review and revision by the applicant –</p>	<p>post-planning approval and detailed design stage, and provide the required information for SWD’s comments.</p>
<p>24m height requirement of a RCHE</p>	
<p>1. According to the Supplementary Planning Statement, we note that the proposed RCHE(s) is located on 3/F to 9/F in the single composite building. All the dormitories provided for the elderly are situated from 3/F to 7/F where are at a height of not more than 24m above the ground level, measuring vertically from the ground of the building to the floor of the premises. The proposed office and back-of-house are situated on 8/F and 9/F which are situated at a height of more than 24m.</p> <p>2. While it is stipulated in Para. 5.3.1 of CoP that "...no part of an RCHE shall be situated at a height more than 24m above the ground floor, measuring vertically from the ground of the building to the floor of the premises in which the RCHE is to be situated...", would the applicant please take note of the above and ensure the height of RCHE is in full compliance with statutory and licensing requirements.</p>	<p>According to Para. 5.3.3 of the CoP concerned, “if an RCHE operator can prove that the RCHE possesses facilities for fire safety, evacuation and rescue, and appropriate evacuation, contingency and fire drill plans to the satisfaction of the DSW, the DSW may approve the ancillary facilities of the RCHE to which the residents normally do not have access (eg. kitchen, laundry room, office, staff resting room) to be situated at a height more than 24m above the ground”.</p> <p>In consultation with experienced RCHE operators, it is generally considered that these back-of-house facilities for administration and management purposes are much needed for a better work environment and support for staffs, and storage of services commodities such as masks, Personal Protective Equipment (PPE), milk powder, diapers, medical equipment, medicines and furniture. The use of 8-9/F is thus considered necessary for supporting the 160 to 220-place RCHE.</p> <p>The Applicant will kindly review the fire safety, evacuation, rescue and other relevant requirements and revise the schematic design as appropriate during the post-planning approval and detailed design stage, and provide the required information for SWD’s comments.</p>
<p>Draft Layout Plan (Appendix 2 “Proposed Development Scheme”)</p>	
<p>1. Dormitory (3/F – 7/F)</p>	<p>Please be advised that the dormitory on each</p>

<ul style="list-style-type: none"> <li>• Please review and advise whether the Dormitory on each of the floors is a cellular room.</li> <li>• Please advise whether the Accessible Toilet cum Shower Room attached to each Dormitory is able to allow the manoeuvring of shower trolley bed measuring 2100 mm x 780 mm x 870 mm, which is used by frail elderly residents with assistance of care worker in bathing.</li> <li>• Please indicate the Accessible Toilet cum Shower Room(s) on the plan.</li> <li>• For our easy reference, please mark the location of each notional bed in size of no less than 970 mm x 2 030 mm on the plan.</li> </ul>	<p>floor will be accommodated in cellular rooms and in compliance with the relevant CoP. The comments are related to matters of detailed design. The Applicant will kindly take note of the requirements, review and revise the schematic design as appropriate during the post-planning approval and detailed design stage, and provide the required information for SWD's comments.</p>
<p>2. Pantry for Residents (3/F – 7/F)</p>	
<ul style="list-style-type: none"> <li>• To avoid confusion, please rename each of the Pantry on 3/F to 7/F to “Pantry for Residents”.</li> <li>• Please review and advise whether the Pantry for Residents on each of the floor with the provision is a cellular room.</li> </ul>	<p>The comments are related to matters of detailed design. The Applicant will kindly review and revise the schematic design as appropriate during the post-planning approval and detailed design stage, and provide the required information for SWD's comments.</p>
<p>3. Nursing Station cum Medical Consultation Room (3/F – 7/F)</p>	
<ul style="list-style-type: none"> <li>• One nursing station at 10 sqm shall be provided on each floor having dormitory rooms or multi-purpose room provision, and for every 50 residents. If there are more than one nursing station, one of them should be attached with a medical consultation corner at 8 sqm. Please review and provide a breakdown of NOFA among the nursing stations across 3/F to 7/F.</li> </ul>	<p>The comments are related to matters of detailed design. The Applicant will kindly review and revise the schematic design as appropriate during the post-planning approval and detailed design stage, and provide the required information for SWD's comments.</p>
<p>4. Sick/ Isolation/ Quiet Room (3/F – 7/F)</p>	
<ul style="list-style-type: none"> <li>• For infection control, please provide a protected lobby via the entrance of each of</li> </ul>	<p>The comments are related to matters of detailed design. The Applicant will kindly</p>

<p>the Sick/ Isolation/ Quiet Room on 3/F to 7/F.</p> <ul style="list-style-type: none"> <li>• One room at 8 sqm should be provided for every 50 residents on each floor with provision of dormitory rooms. Please review and provide a breakdown of NOFA among the Sick/ Isolation/ Quiet Rooms across 3/F to 7/F.</li> <li>• Please advise whether the Accessible Toilet cum Shower Room attached to each Sick/ Isolation/ Quiet Room is provided and able to allow the manoeuvring of shower trolley bed measuring 2100 mm x 780 mm x 870 mm, which is used by frail elderly residents with assistance of care worker in bathing.</li> <li>• Please indicate the attached Accessible Toilet cum Shower Room(s) on the plan.</li> </ul>	<p>take note of the requirements, review and revise the schematic design as appropriate during the post-planning approval and detailed design stage, and provide the required information for SWD's comments.</p>
<p>5. End-of-life Care Room (3/F)</p>	
<ul style="list-style-type: none"> <li>• As a habitation area, End-of-life Care Room should be located at an area equipped with openable window(s).</li> </ul>	<p>The comments are related to matters of detailed design. The Applicant will kindly take note of the requirements, review and revise the schematic design as appropriate during the post-planning approval and detailed design stage, and provide the required information for SWD's comments.</p>
<p>6. Soiled Utility Room (3/F – 7/F)</p>	
<ul style="list-style-type: none"> <li>• Referring to the draft layout plan, there is 1 no. of Soiled Utility Room on each floor of the RCHE with a combined NOFA of 37 sqm, which is considerably above the 10% deviation allowed for functional rooms. For the provision of Soiled Utility Room, it requires one room at 4 sqm on each floor having dormitory rooms, and for every 50 residents. Please review.</li> </ul>	<p>The comments are related to matters of detailed design. The Applicant will kindly take note of the requirements, review and revise the schematic design as appropriate during the post-planning approval and detailed design stage, and provide the required information for SWD's comments.</p>

<ul style="list-style-type: none"> <li>For infection control, please consider re-locating all of the Soiled Utility Room(s) across 3/F to 7/F, as they are close to habitation areas such as Dining/Multipurpose Room (3/F) and Dormitory (4/F to 7/F).</li> </ul>	
<p>7. Dumb Waiter (3/F – 7/F)</p>	
<ul style="list-style-type: none"> <li>Please review and advise whether the Dumb Waiter on each of the floor with the provision is a cellular room.</li> <li>Floor openings, shaft enclosure, pit and machine room for the Dumb Waiter shall be provided.</li> </ul>	<p>The comments are related to matters of detailed design. The Applicant will kindly take note of the requirements, review and revise the schematic design as appropriate during the post-planning approval and detailed design stage, and provide the required information for SWD’s comments.</p>
<p>8. Clean Utility Room (8/F)</p>	
<ul style="list-style-type: none"> <li>Please review the location(s) of the Clean Utility Room and the Refuse Room on 8/F. For infection control, these two rooms shall not be located near to each other.</li> </ul>	<p>The comments are related to matters of detailed design. The Applicant will kindly take note of the requirements, review and revise the schematic design as appropriate during the post-planning approval and detailed design stage, and provide the required information for SWD’s comments.</p>
<p>9. Refuse Room (8/F)</p>	
<ul style="list-style-type: none"> <li>Please see the comments on the above “8. Clean Utility Room” and revise the location(s) of the two rooms on 8/F accordingly.</li> </ul>	<p>The comments are related to matters of detailed design. The Applicant will kindly take note of the requirements, review and revise the schematic design as appropriate during the post-planning approval and detailed design stage, and provide the required information for SWD’s comments.</p>
<p>10. Superintendent’s Office, Assistant Superintendent’s Office, &amp; General Office (9/F)</p>	
<ul style="list-style-type: none"> <li>Please review and consider removing the wall blocking the access to Reception</li> </ul>	<p>The comments are related to matters of detailed design. The Applicant will kindly</p>

<p>area, Conference Room, and the adjacent lifts.</p>	<p>take note of the requirements, review and revise the schematic design as appropriate during the post-planning approval and detailed design stage, and provide the required information for SWD's comments.</p>
<p>11. Conference Room (9/F)</p>	
<ul style="list-style-type: none"> <li>Please see the comments on the above "10. Superintendent's Office, Assistant Superintendent's Office, &amp; General Office" and revise accordingly.</li> </ul>	<p>The comments are related to matters of detailed design. The Applicant will kindly take note of the requirements, review and revise the schematic design as appropriate during the post-planning approval and detailed design stage, and provide the required information for SWD's comments.</p>
<p>12. Female/ Male Staff Changing Room and Rest Room cum Pantry (9/F)</p>	
<ul style="list-style-type: none"> <li>For the provision of Staff changing room, Sleep-in room, and Restroom &amp; Pantry, they respectively require 39.3 sqm, 11.8 sqm, and 5.9 sqm on pro rata basis. Please review and provide a breakdown of NOFA among the rooms.</li> <li>Please indicate the above-mentioned rooms as cellular rooms on the plan for our easy reference.</li> </ul>	<p>The comments are related to matters of detailed design. The Applicant will kindly take note of the requirements, review and revise the schematic design as appropriate during the post-planning approval and detailed design stage, and provide the required information for SWD's comments.</p>
<p>13. Communal Toilet (3/F – 9/F)</p>	
<ul style="list-style-type: none"> <li>Please indicate the provision on the plan.</li> </ul>	<p>The comments are related to matters of detailed design. The Applicant will kindly take note of the requirements, review and revise the schematic design as appropriate during the post-planning approval and detailed design stage, and provide the required information for SWD's comments.</p>
<p>Schedule of Accommodation</p>	
<p>1. Please revise the description and NOFA under the column "Provision on pro rata</p>	<p>The comments are related to matters of detailed design. The Applicant will kindly</p>

<p>basis (B)” of Item No. 6. Description of this item should be “Nursing Station cum Medical Consultation Room”. The NOFA of this item under the column “Provision on pro rata basis (B)” should be at 58 sqm (one nursing station at 10 sqm each across 3/F – 7/F and one medical consultation corner at 8 sqm).</p>	<p>take note of the requirements, review and revise the SoA as appropriate during the post-planning approval and detailed design stage, and provide the required information for SWD’s comments.</p>
<p>2. Please revise the description and NOFA under the column “Provision on pro rata basis (B)” of Item No. 7. Description of this item should be “Sick/ Isolation/ Quiet Room”. The NOFA of this item under the column “Provision on pro rata basis (B)” should be at 32 sqm (one room at 8 sqm for every 50 residents).</p>	<p>The comments are related to matters of detailed design. The Applicant will kindly take note of the requirements, review and revise the SoA as appropriate during the post-planning approval and detailed design stage, and provide the required information for SWD’s comments.</p>
<p>3. Please revise the NOFA under the column “Provision on pro rata basis (B)” of Item No. 12 “Soiled Utility Room”. The NOFA of this item under the column “Provision on pro rata basis (B)” should be at 20 sqm (one room at 4 sqm on each floor having dormitory rooms).</p>	<p>The comments are related to matters of detailed design. The Applicant will kindly take note of the requirements, review and revise the SoA as appropriate during the post-planning approval and detailed design stage, and provide the required information for SWD’s comments.</p>
<p>4. Please revise the “Floor Distribution” of Item no. 16 “Dumb Waiter”, as the provision of Dumb Waiter spreads across 3/F – 8/F.</p>	<p>The comments are related to matters of detailed design. The Applicant will kindly take note of the requirements, review and revise the SoA as appropriate during the post-planning approval and detailed design stage, and provide the required information for SWD’s comments.</p>
<p>5. Please revise the description and NOFA under the column “Provision on pro rata basis (B)” of Item no. 19 “Interview Room/ Family Room”. Description of this Item should be “Interview/ Meeting/</p>	<p>The comments are related to matters of detailed design. The Applicant will kindly take note of the requirements, review and revise the SoA as appropriate during the post-planning approval and detailed design</p>



<p>Family Room”. The NOFA of this item under the column “Provision on pro rata basis (B)” should remain at 14 sqm (one room at 8 sqm and one room at 6 sqm).</p>	<p>stage, and provide the required information for SWD’s comments.</p>
<p>6. Please revise the description of Item No. 26 as “Female/ Male Staff Changing Room and Rest Room cum Pantry”.</p>	<p>The comments are related to matters of detailed design. The Applicant will kindly take note of the requirements, review and revise the SoA as appropriate during the post-planning approval and detailed design stage, and provide the required information for SWD’s comments.</p>
<p>7. It is noted that rooms/areas, such as Linen Room, Dish Washing Area, Cold Food Store, and Dry Food Store on 8/F as well as IT/Server Room on 9/F, on the plan are missing from the SoA table in Appendix. Please review and revise accordingly.</p>	<p>The comments are related to matters of detailed design. The Applicant will kindly take note of the requirements, review and revise the SoA as appropriate during the post-planning approval and detailed design stage, and provide the required information for SWD’s comments.</p>
<p>8. Please note that the proposed NOFA for individual functional rooms/ areas should be within 10% deviation from the provision of standard SoA and the overall NOFA should be within 5% deviation, respectively. If there are any consequential changes in the proposed area arising from the revision of layout plan, would the applicant please update the SoA table for our consideration.</p>	<p>The comments are related to matters of detailed design. The Applicant will kindly take note of the requirements, review and revise the SoA as appropriate during the post-planning approval and detailed design stage, and provide the required information for SWD’s comments.</p>
<p>Please note that the above comments are from service and operation point of view. Would the applicant please ensure that the design and construction of the proposed RCHE shall comply with all relevant licensing and statutory requirements including but not limited to the (i) Residential Care Homes</p>	<p>Noted with thanks. At the detailed design stage, the Applicant will ensure that the design and construction of the proposed RCHE shall comply with all relevant licensing and statutory requirements including but not limited to the (i) Residential Care Homes (Elderly Persons) Ordinance</p>

<p>(Elderly Persons) Ordinance (Cap. 459) and its subsidiary legislation and (ii) Code of Practice for Residential Care Homes (Elderly Persons).</p>	<p>(Cap. 459) and its subsidiary legislation and (ii) Code of Practice for Residential Care Homes (Elderly Persons).</p>
<p>The provided departmental comments on the planning application may be subject to revision should there be a change in circumstances.</p>	<p>Noted with thanks.</p>