

APPLICATION FOR PERMISSION
UNDER SECTION 16 OF THE TOWN PLANNING ORDINANCE

APPLICATION NO. A/H3/437

<u>Applicant</u>	:	Tung Wah Group of Hospitals (TWGHs) represented by Kenneth To & Associates Ltd
<u>Site</u>	:	122A to 130 Hollywood Road, Sheung Wan
<u>Site Area</u>	:	About 1,632m ²
<u>Lease</u>	:	IL 338 Virtually unrestricted except for the non-offensive trades clause
<u>Plan</u>	:	Approved Sai Ying Pun & Sheung Wan Outline Zoning Plan (OZP) No. S/H3/31
<u>Zoning</u>	:	“Government, Institution or Community” (“G/IC”) - restricted to a maximum building height (BH) of 1 storey (western portion) and to a maximum BH of 97mPD (eastern portion), or the height of the existing building, whichever is the greater
<u>Application</u>	:	Proposed Residential Institution (Youth Hostel)

1. The Proposal

- 1.1 The applicant seeks planning permission for a proposed 21-storey youth hostel at the application site (the Site) which is zoned “G/IC” on the approved Sai Ying Pun & Sheung Wan OZP No. S/H3/31 (**Plan A-1**). According to the Notes of the “G/IC” zone, planning permission from the Town Planning Board (the Board) is required for the proposed ‘Residential Institution’ (Youth Hostel) use.
- 1.2 The proposed youth hostel is confined within the eastern portion of the Site currently occupied by the TWGHs Lee Sai Chow Memorial Primary School. The western portion of the Site, where the Man Mo Temple Compound (MMTC) is located, would not be affected by the proposed development.
- 1.3 In support of the application, the applicant have submitted the following documents:

- (a) Application Form received on 18.4.2018 **(Appendix I)**
- (b) Planning Statement **(Appendix Ia)**
- (c) Further Information dated 8.6.2018 providing Geotechnical Assessment Report and responses to departmental comments submitted by the Applicant **(Appendix Ib)**
(not exempted from publication and recounting requirements)
- (d) Further Information dated 12.6.2018 providing responses to departmental and public comments **(Appendix Ic)**
- (e) Further Information dated 28.6.2018 providing responses to departmental comments submitted by the Applicant **(Appendix Id)**
- (f) Further Information dated 12.7.2018 providing responses to departmental comments submitted by the Application **(Appendix Ie)**
- (g) Further Information dated 17.7.2018 providing clarification to departmental comments **(Appendix If)**
- (h) Further Information dated 26.7.2018 providing clarification to departmental comments. **(Appendix Ig)**

1.4 The major development parameters and floor uses of the proposed development are set out as follows:

	<u>MMTC</u> <u>(to be preserved)</u>	<u>Proposed Youth Hostel</u>
Site Area	1,632m ²	
Domestic GFA	-	7,057.99m ²
Domestic PR	-	Not more than 4.33
Non-domestic GFA	About 606.23m ² (existing)	-
Non-domestic PR	About 0.37 (existing)	-
Domestic site coverage (SC)	-	24.75%
Non-domestic SC	About 42.9% (existing)	-
No. of Storey(s)	1 (existing)	21 (incl. 2 mezzanine floors)
BH (at main roof)	-	96.73mPD / 70.4m
No. of Bed Spaces	-	302

	<u>MMTC</u> <u>(to be preserved)</u>	<u>Proposed Youth Hostel</u>
Room Size (NOFA ^{Note 1})	-	13.5m ² to 20.3m ²
Private Open Space		302m ²
Proposed Car Parking Spaces	-	2
Proposed Loading/unloading (L/UL) Bay	-	1
Uses by Floor		
G/F	Man Mo Temple (existing)	Heritage Bazaar / Entrance Lobby / Car Park / L/UL bay / E&M Rooms
M/F (Lv. 31.58mPD/35.58mPD)	-	E&M Rooms / Viewing Platform (Lv. 31.58mPD)
1/F	-	Reading Room / Viewing Platform / E&M Rooms / Storage
2/F	-	Activity Room / Multi-purpose Rooms / Common Kitchen / Viewing Platform / Management Office
3/F to 12/F	-	Bedrooms / Sitting Room / Pantry / Laundry
13/F to 18/F	-	Bedrooms / Pantry
Main R/F	-	Roof Garden / E&M Rooms

Note 1 NOFA is the “Net Operational Floor Area” comprises a summation, round up, of all internal dimensions of rooms/spaces contained within the approved Schedule of Accommodation. This area excludes all structure and partitions, circulation areas, staircases, staircase halls, lift landings, the space occupied by toilet facilities, mechanical and electrical services such as lift and air-conditioning systems.

- 1.5 The site location plan, floor layouts, section plan and photomontage of the proposed development submitted by the applicant are shown in **Drawings A-1 to A-20**.
- 1.6 In order to improve the spatial connection with MMTC, the proposed hostel development has adopted the following design elements which were included in the heritage impact assessment (HIA) that was accepted by the Antiquities and Monument Office (AMO) and supported by the Antiquities Advisory Board (AAB) on 4.6.2015 (**Drawing A-2**):
 - (a) provision of a Heritage Bazaar at G/F with headroom of 11m (higher than the building of MMTC) to serve as a venue for events that promote the social, historical and cultural values of the MMTC;
 - (b) the setback of all structures on G/F by 5.8m from Hollywood Road to align

with the façade of MMTC;

- (c) the setback of the proposed youth hostel tower block by 2.9m from Hollywood Road to improve the spatial quality of Hollywood Road;
- (d) the setback of the column and building structure on G/F abutting the gable wall of MMTC by 0.8m to provide a buffer zone; and
- (e) the demolition of the fence wall between MMTC and the proposed youth hostel to reconnect the Heritage Bazaar and the forecourt of MMTC.

1.7 To address the Board's concerns on how the design of the youth hostel could be improved to better integrate with and minimise any adverse visual impact on MMTC, the applicant has liaised with AMO to further enhance the building design by incorporating the following additional design measures/features:

- (a) to commemorate the schools that had once been built on the subject site, the indicative outline of the former school buildings would be embedded as floor inlay pattern within the Heritage Bazaar (**Drawing A-20**);
- (b) a stairway and viewing platform will be provided at the 31.58mPD level with an opening onto Ping On Lane, creating a linkage between the forecourt of MMTC and Ping On Lane where the doorframe with the words "Tao Wo" is located (**Plan A-5**) ;
- (c) viewing platforms on 1/F and 2/F will be provided facing both Hollywood Road and MMTC, providing different perspectives at a higher level to appreciate MMTC. These viewing platform with recessed space will help to break down the visual mass of the tower at lower level, where the hanging planters will soften the edge of the building structure and enhance the visual quality;
- (d) to keep a low profile, milky white ceramic tiles will be used as wall tiles for the Heritage Bazaar, and smooth-surface wall tiles of similar milky colour tone will be used for the external wall of the tower block.
- (e) to reconnect the MMTC with the former school site, granite stone paving of the forecourt of the MMTC will be extended to the Heritage Bazaar upon demolishing the fence wall between MMTC and the proposed youth hostel site;
- (f) the outdoor units of the air-conditioning facilities between 3/F to 12/F will be relocated to the side facing Ping On Lane, so as to keep the façade facing MMTC free from air-conditioning platforms and to minimise unnecessary interruption or maintenance works at high level of the MMTC; and
- (g) vertical sun-shading screens will be installed to the west facing façade to reduce the heat gain.

1.8 The proposed Heritage Bazaar would be used during festive events as a gathering place for participants of the events. During non-festive seasons, the Heritage Bazaar would be used to exhibit the historical photos, information on the history, architecture and festive events of MMTC, and as a gathering place for guided

tours. Regular art markets with cultural activities such as handicraft display and sales, and art workshop will also be held. The carpark within the Heritage Bazaar will be of infrequent use and both physical and management measures will be implemented to avoid conflict between the public and the manoeuvring of vehicles.

- 1.9 In order to minimize impacts to the MMTC at the demolition, construction and post-construction stages, several mitigation measures would be adopted including provision of a buffer zone; the use of prefabrication; condition survey with monitoring proposals for MMTC, Ladder Street and granite doorframe at Ping On Lane, double-deck catch platform; non-percussive piling methods and limitation on works area.
- 1.10 The applicant has submitted various technical assessments in support of the application including traffic impact assessment, supplementary statement of HIA, visual impact assessment, environmental assessment, air ventilation assessment, a geotechnical assessment and a landscape proposal.

2. Justifications from the Applicant

- 2.1 The justifications put forth by the applicant in support of the application can be summarised as follows:
 - (a) the proposed development is in line with Government's Policy for Youth Hostel Development. In the 2011-2012 Policy Address, the Chief Executive has introduced the Youth Hostel Scheme (YHS) to encourage non-governmental organizations (NGOs) participation in the building and operation of youth hostels on land granted to them by the Government.
 - (b) the proposed youth hostel meets the planning intention of the "G/IC" zone which is to provide GIC facilities serving the needs of the local residents and/or a wider district, region or the territory;
 - (c) the development scale is considered appropriate and no adverse visual impact will be caused. Compared with surrounding residential developments such as Hollywood Terrace (134.95mPD), Centre Hollywood (108.85mPD), Como Como (96.3mPD) and Center Stage (162.6mPD), the scale and bulk of the proposed youth hostel with BH of 21 storeys (96.33mPD) is considered appropriate and not out-of-context.
 - (d) the building design of the lower levels of the proposed youth hostel has been carefully considered to minimise the visual impact at pedestrian level. The high headroom design (11m) at G/F is higher than the BH of the adjacent MMTC, setback of building structures from Hollywood Road and gable wall of MMTC and setback of the tower block would greatly enhance the visual permeability of the proposed development at pedestrian level;
 - (e) the proposed youth hostel will respect the adjacent MMTC which is of high historical, cultural and aesthetic values. Viewing platforms on 1/F and 2/F will allow MMTC to be appreciated from different perspectives. The viewing platform provided at the higher level of Heritage Bazaar will allow

connection between the doorframe at Ping On Lane and the forecourt of MMTC;

- (f) the proposal facilitates the revitalization of an old district and enhances population diversity. Complementing the Central Police Station Revitalisation project (Tai Kwun) and Former Hollywood Road Police Married Quarters (PMQ), the proposed youth hostel which catering for the young residents, will further revitalise the area and make it a more attractive place for people to live and visit;
- (g) the Heritage Bazaar at G/F will provide a space of 280m² for social and cultural activities to complement the MMTC. It would be used for exhibition, festive events for MMTC, gathering point of guided tours, activity space, weekend/monthly art markets, which will increase the public activity space for the community to enhance social cohesion and building up social capital;
- (h) no adverse impact to the surrounding area is anticipated in terms of traffic, noise, air quality, air ventilation, and sewerage;
- (i) the proposed development work is considered to be geotechnically feasible. Detailed ground investigation and ground water monitoring shall be planned to verify the geological condition of the Site and its surrounding. Further review supporting the proposed development will be carried out during the detailed design stage.

3. Compliance with the “Owner’s Consent/Notification” Requirements

The applicant is the sole “current land owner” of the site and has submitted documentary proof of ownership as required in the Town Planning Board Guidelines on Satisfying the “Owner’s Consent/Notification” Requirements under Sections 12A and 16 of the Town Planning Ordinance (TPB PG-No. 31).

4. Background

- 4.1 In the 2011-2012 Policy Address, the Chief Executive (CE) has stated that the Government was aware of the concern of some NGOs about the aspiration of working youths to have their own living space, and would actively support NGOs’ plan to use part of the land granted to them by the Government for “G/IC” use to build hostels for youths. While the youth hostels were not meant to provide a permanent accommodation for youths, the YHS would unleash the potential of under-utilized sites and provide an alternative accommodation option for working youths aged 18-30.
- 4.2 TWGHs was amongst the group of NGOs that had expressed interest in the YHS proposal. The proposed youth hostel development at Hollywood Road is one of the projects that were launched as a pilot scheme. To implement the scheme, the Government would provide full capital funding through the Capital Works Reserve Fund (“CWRF”) subject to the endorsement of the Public Works Subcommittee (“PWSC”) and approval of the Finance Committee (“FC”) of

LegCo. The proposed youth hostel will be operated by the TWGHs under the self-financing mode in which the premises will be managed, operated and maintained at its own expenses.

- 4.3 To facilitate the redevelopment of the existing school into the proposed youth hostel, the applicant submitted a s.12A planning application to rezone the Site from “G/IC” to “G/IC”(2) with stipulation of a BH restriction of 97mPD for the eastern portion of the Site, while the BH restriction of the MMTC in the western portion of the site remains unchanged as 1 storey. The applicant also proposed to amend the Notes of the “G/IC” zone by adding “Residential Institution (Hostel Only)” as a use that is always permitted under the proposed “G/IC(2)” zone. The s.12A application was agreed by the Committee on 13.5.2016.
- 4.4 On 30.9.2016, the proposed amendments involving the rezoning of the Site from “G/IC” to “G/IC(2)” with a BH restriction of 97mPD for the youth hostel part of the Site, and including “Residential Institution (Hostel only) (on land designated “G/IC(2)” only)” as a Column 1 use of the “G/IC” zone, were agreed by the Committee. The draft OZP No. S/H3/30 incorporating the above amendments was gazetted on 21.10.2016. A total of 635 representations were received during the 2-month plan publication period. After giving consideration to the representations on 21.4.2017, the Board decided to partially meet some of the representations by rezoning the site from “G/IC(2)” to “G/IC” and to require planning permission for development of a youth hostel at the Site “to ensure that the building design would be scrutinized by the Board so as to minimize any adverse visual impact it might have on MMTC”. The Board also agreed to retain the building height restriction of 97mPD for the western portion of the site. A total of 41 further representations were received during the statutory plan exhibition period. After giving consideration to the further representations on the proposed amendments on 18.8.2017, the Board decided to amend the OZP as proposed and the draft OZP was approved by the Chief Executive in Council on 5.12.2017.

5. Previous Application

There is no previous application at the application site.

6. Similar Application

- 6.1 There is 1 similar application for residential institution development within “G/IC” zone of the Sai Ying Pun & Sheung Wan OZP. Application no. A/H3/419 is for a proposed student hostel at 10-22 Mui Fong Street and 15-19 Kwai Heung Street, Sai Ying Pun and minor relaxation of the BH restriction from 80mPD to 81.53mPD. The Committee approved the application with conditions on 13.12.2013. The details are at **Appendix II**.

7. The Site and Its Surrounding Areas (Plans A-1 to A-4)

- 7.1 The Site:

- (a) is currently divided into two portions; with the vacant 8-storey Lee Sai Chow Memorial Primary School on the eastern portion of the site and the MMTC, a declared monument, in the western part of the site. The declared monument comprises 3 buildings, i.e. Man Mo Temple, Lit Shing Kung and Kung Sor. Virtue Court, located behind Kung Sor, is a later addition which does not form part of the declared monument; and
- (b) is adjoined by Ladder Street, a declared monument, on the west and by Ping On Lane, not a graded historic structure, on the east.

7.2 The surrounding areas have the following characteristics:

- (a) predominantly residential in nature with a mix of GIC uses including the YMCA Headquarters, King's College Old Boys' Association Primary School, and the Hong Kong News-Expo (former Bridges Street Market);
- (b) several high-rise residential buildings are found in the vicinity such as Como Como (96.3mPD), Centre Hollywood (108.8mPD) and Centre Stage (162.6mPD);
- (c) an open space, the Hollywood Road Children Playground is located to the immediate north;
- (d) The PMQ is located about 100m to the east; and
- (e) the MTR Sheung Wan Station is about 300m away. The area is well served by other means of public transport including buses and minibuses.

8. Planning Intention

- 8.1 The "G/IC" zone is intended primarily for the provision of GIC facilities serving the needs of the local residents and/or wider district, region or the territory. It is also intended to provide land for uses directly related to or in support of the work of the Government, organisations providing social services to meet community needs, and other institutional establishments.

9. Comments from Relevant Government Departments

- 9.1 The following Government departments have been consulted and their views on the application and on the public comments are summarised as follows:

Policy Aspects

9.1.1 Comments of the Secretary of Home Affairs (SHA):

- (a) TWGHs' youth hostel project at the site concerned in Sheung Wan has the policy support of Home Affairs Bureau (HAB). The project has been announced by the then CE in December 2012 as one of the pilot projects under the Youth Hostel Scheme. The HAB considers TWGHs' development proposal acceptable. As a matter of policy,

HAB will continue to assist NGOs in pursuing youth hostel projects in accordance with all relevant legislation and statutory procedures; and

- (b) the proposed youth hostel development is in compliance with the Man Mo Temple Ordinance (Cap.154). HAB consulted the Department of Justice on the matter and was advised that the proposed redevelopment at the Site as a youth hostel falls within the objects of the MMT Fund as provided in section 3 of Cap.154 and powers conferred on TWGHs under section 3A of Cap.154. On the other hand, TWGHs' lawyers gave the legal opinion that TWGHs may, as trustee and manager of the MMT Fund, develop or redevelop any property belonging to the Fund either by pulling down any existing premises or structures and rebuilding thereon or in any other manner as TWGHs see fit in accordance with section 3(c) of Cap. 154, provided that all funds and income derived from the proposed development shall be used for the objects set out under section 3 of the Cap.154.

Land Administration

9.1.2 Comments of the District Lands Officer/Hong Kong West & South, Lands Department (DLO/HKW&S, LandsD):

- (a) the application site falls within the private lot IL 338. The lot is governed by a Government Lease as modified by a Modification Letter dated 17.8.1995. The Government Lease is subject to the restriction of offensive trades clause while the Modification Letter restricts the lot owner not to use that portion of the demised premises where a temple at the time being known as "Virtue Court" (善德宮) now stands for any purpose other than a non-profit-making ancestral tablets hall in connection with Man Mo Temple and ancillary facilities as may be approved by the Director of Lands;
- (b) if any part of the proposed hostel development is to be used for the purpose of restaurant/bar/café facilities, an application for licence to remove several offensive trades from the non-offensive trades clause is required; and
- (c) assuming no restaurant/bar/café facilities are to be provided within the proposed hostel development, the current proposal does not conflict with the lease conditions governing the subject site; and so, if the application is approved by the Board, the applicant is not required to seek lease modification from LandsD to implement it. Therefore, any planning conditions, if imposed by the Board, cannot be written into the lease through lease modification.

Cultural Heritage Aspect

9.1.3 Consolidated comments of the Commissioner for Heritage's Office, Development Bureau (CHO, DEVB) and the Antiquities and Monument Office, Leisure and Cultural Services Department (AMO, LCSO):

- (a) no particular comment on the planning application and the supporting planning statement from heritage conservation viewpoint;
- (b) in view of the possible impact of the proposed youth hostel to the MMTC, a declared monument, the project proponent (TWGHs) has engaged a heritage consultant to conduct a Heritage Impact Assessment ("HIA") in accordance with the HIA mechanism to examine the possible impact of the proposed development to the monument and to devise mitigation measures as appropriate;
- (c) the findings of the HIA and the proposed mitigation measures were presented to the AAB on 4.3.2015. The design of the proposed youth hostel was subsequently revised in accordance with the advice of AAB, and was re-submitted to AAB on 4.6.2015. The revised design of the youth hostel and the proposed mitigation measures were finally accepted by AMO and AAB; and
- (d) TWGHs will also submit condition survey reports and monitoring proposals for the MMTC and Ladder Street to AMO for comments before implementation of the monitoring/protection measures.

Building Aspect

9.1.4 Comments of the Chief Building Surveyor/ Hong Kong East & Heritage, Heritage Unit, Buildings Department (CBS/HKE&H, BD):

- (a) no in-principle objection;
- (b) detailed comments on compliance with the Buildings Ordinance (BO) would be given upon formal building plans submission;
- (c) if the applicant intends to apply for GFA exemptions for the green/amenity features and non-mandatory/non-essential plant rooms, the pre-requisites and the sustainable building design guidelines as stipulated in PNAP APP-151 and 152 should be complied with;
- (d) the request/support from the AAB/AMO for provision of a high headroom on G/F for whatever reasons, such as the reveal of the gable walls of Man Mo Temple shall be produced at the plan submission stage if the high headroom is to be excluded from GFA calculation;
- (e) access for persons with a disability should be provided in accordance with the Design Manual: Barrier Free Access 2008; and
- (f) it is noted that the fireman's lift is not duly provided with a fireman's lift lobby in accordance with Code of Practice for Fire Safety in Buildings 2011.

Transport Aspect

9.1.5 Comments of the Commissioner for Transport (C for T):

- (a) no adverse comments on the findings of the TIA;
- (b) Hollywood Road is a one-way single-lane eastbound local distributor connecting Queen's Road West and Wyndham Street, conveying traffic from Sheung Wan area to the Central Business District (CBD). Traffic flow is high especially in the afternoon and traffic problems at the CBD would result in traffic queue along Hollywood Road. Vehicles parking along roadside for loading/unloading and picking-up/setting-down passengers are observed;
- (c) based on the updated TIA, the additional traffic generated by the proposed development will be minimal (around 10 pcu/hr) owing to its development nature. The TIA also revealed that major junctions in the vicinity of the Site will still perform within capacity after additional traffic and concluded that the proposed development would not generate negative impact on the surrounding road network; and
- (d) in view of the services provided by the youth hostel, it is expected that the traffic generated by the proposed development will not increase the capacity of the nearby coach parking spaces. Hence, the proposed youth hostel would not bring about insurmountable negative impacts on traffic in the area.

Environmental Aspect

9.1.6 Comments of the Director of Environmental Protection (DEP):

- (a) no comment on the SIA;
- (b) it is noted that the EA report is the same report submitted under the previous s.12A rezoning application. The applicant committed a set of mitigation measures to cope with the potential smoke from incense/joss burning at Man Mo Temple to the proposed youth hostel, which include:
 - (i) all units will be served with central fresh air supply system with split type air conditioning;
 - (ii) an air filtration system of 80% odour and particulate removal efficiency will be installed at the central fresh air intake;
 - (iii) a storage room on 1/F of the youth hostel is reserved to explore the possibility of installing a treatment plant to further increase the removal efficiency of air filtration system; and
 - (iv) to tackle the long-term smoke issues at source from the Man Mo Temple, TWGHs will also commence a study to explore the feasibility of improvement works at the Temple to reduce smoke emission from the Temple, ensuring that "*the Guidelines on Air Pollution Control for Joss Paper Burning at Chinese Temples, Crematoria and Similar Places*" could be

followed to minimise the nuisance arising from burning of joss papers;

- (c) no objection to the application, given that the applicant maintained the above mitigation measures in the EA report.
- (d) in addition to the set of air quality mitigation measures undertaken by MMTC to minimise air quality nuisance due to joss burning at the proposed youth hostel, there will also be a noticeable air quality improvement upon the implementation of the proposed redevelopment and associated mitigation measures compared to the current situation at the subject site. The future occupants of the proposed youth hostel would not be subject to insurmountable air quality impacts.

Visual and Urban Design Aspects

9.1.7 Comments of the Chief Town Planner/Urban Design and Landscape, PlanD (CTP/UD&L, PlanD):

in terms of height and scale, the proposed development of 96.73mPD is not incompatible with the existing neighbourhood that is characterised by high-rise residential developments and the high-rise context of the area.

9.1.8 Comments of the Chief Architect/CMD2, Architectural Services Department (CA/CMD2, ArchSD):

- (a) the proposed use, development massing and intensity may not be incompatible with adjacent developments with maximum BH ranging from 120mPD to 150mPD. In this regard, there is no comment from visual impact point of view;
- (b) for provision of 20% greenery area, it is noted that PNAP APP-151 and 152 would be complied with if any GFA exemptions would be applied for. In this regard, there is no further comment at this stage;
- (c) for emergency vehicular access serving the Site, it is noted that the compliance with B(P)R 41D and PNAP APP-136 would be demonstrated in the building plans submission. In this regard, there is no further comment at this stage; and
- (d) for considerable façade area facing west, it is noted that the applicant would review and incorporate sun-shading devices in façade facing west in detailed design stage as far as possible. In this regard, there is no further comment at this stage.

Landscape Aspect

9.1.9 Comments of the Chief Town Planner/Urban Design and Landscape, PlanD (CTP/UD&L, PlanD):

- (a) the proposed development is considered not incompatible with the

urban landscape character;

- (b) for the proposed landscape areas on roof floor, section indicating proposed planting materials, its size and soil depth etc. should be provided to demonstrate the practicality of planting design and support sustainable plant growth. The applicant should ensure additional loading and drainage of landscape areas are allowed for the roof planting;
- (c) the management party to maintain the existing wall tree in the Site is unknown and the applicant should identify accordingly prior to the implementation of tree preservation measures. Such measures, if any, should be carried out by a certified arborist or competent person; and
- (d) should the Board approve the application, an approval condition on “The submission and implementation of landscape proposal to the satisfaction of the Director of Planning or of the Town Planning Board” should be included.

Geotechnical Aspect

9.1.10 Comments of the Head of the Geotechnical Engineering Office (H(GEO)), CEDD:

- (a) no comment on the Geotechnical Assessment Report submitted by the applicant which can be treated as the Geotechnical Planning Review Report;
- (b) the site is within the Mid-levels Scheduled Area and any works within this Area are subject to stringent geotechnical controls under the BO to safeguard public safety and ground stability in this Area. The details of the geotechnical control are highlighted in the Practice Note for Authorized Persons, Registered Structural Engineers and Registered Geotechnical Engineers No. APP-30 which can be downloaded from the website of the Buildings Department (<http://www.bd.gov.hk/english/documents/indexynap.html>).
- (c) the proposed works may involve demolition of existing school and construction of the youth hostel. Due to lack of details at this stage, we reserve our comments on the applicant's statement in the application form that the development involves no excavation work.

Drainage and Sewerage Aspects

9.1.11 Comments of the Director of Drainage Services (D of DS):

- (a) no objection to the application; and
- (b) the SIA for the planning application needs to meet the full satisfaction of EPD, the planning authority of sewerage infrastructure. DSD's comments on the SIA are subject to views

and agreement of EPD.

Tourism Aspect

9.1.12 Comments of the Commissioner for Tourism:

from the heritage and cultural tourism perspective, there is no comment on the application, provided that the adjacent Man Mo Temple, which is a declared monument and a popular heritage attraction among visitors will continue to be preserved, and that the visitors' free access to the temple will not be adversely affected. In addition, the planning application should also be agreeable to all relevant Government departments and other stakeholders.

Fire Services

9.1.13 Comments of the Director of Fire Services (D of FS):

- (a) no objection in-principle;
- (b) subject to fire service installations and water supplies for firefighting being provided to the satisfaction of this Department. Detailed Fire Services requirements will be formulated upon receipt of formation submission of general building plans; and
- (c) the applicant is advised to observe the requirements of EVA as stipulated in Section 6, Part D of the Code of Practice for Fire Safety in Building 2011 which is administered by the Buildings Department.

District Officer's View

9.1.14 Comments of the District Officer (Central & Western), Home Affairs Department (DO(C&W), HAD):

the proposed development was discussed at the Food, Environment, Hygiene and Works Committee under Central and Western District Council (C&WDC) and the C&WDC meeting on 24.7.2014 and 20.10.2016 respectively. While members support the proposed development in general, individual members were concerned about the impact of the buildings and the works on the neighbourhood, and any impact on the air ventilation of the area, in particular the Man Mo Temple. Some commented that the protection should also be given to Man Mo Temple to prevent damage during construction of the development.

9.2 The following Government departments have no objection/ comment on the application:

- (a) Commissioner of Police;

- (b) Chief Highway Engineer/Hong Kong, Highways Department;
- (c) Director of Leisure and Cultural Services;
- (d) Director of Food and Environmental Hygiene;
- (e) Chief Engineer/Construction, Water Supplies Department; and
- (f) Project Manager (South), Civil Engineering and Development Department

10. Public Comments Received During Statutory Publication Period

- 10.1 During the statutory publication periods of the application (ended on 18.5.2018) and its subsequent FI dated 8.6.2018 (ended on 10.7.2018), a total of 742 comments were received. Amongst the public comments received, 602 support the application of which 369 are similar/standard comments from individuals; 113 oppose the application of which 99 are similar/standard comments, and 27 comments did not indicate whether they support or oppose the application.
- 10.2 The supporting comments are submitted by members of the general public, while the opposing comments were received from members of the general public, Legislative Council member Hon Tanya CHAN, Central and Western District Council (C&WDC) members Ms. NG Hoi-yan Bonnie and CHAN Chit-kwai Stephen, and concern groups including the Tsim Sha Tsui Residents Concern Group and the Central and Western Concern Group. A full set of the public comments received are at **Appendix III** for Members' reference.
- 10.3 The major grounds of public comments received are summarised as follows:

Supporting Comments

- (a) the proposed development has balanced various aspects including design, air ventilation, visual impact, etc.;
- (b) the design of the youth hostel respects the historical and cultural significance of MMTC, while injects vibrancy to the area;
- (c) efficient use of the vacant school site and alleviates imminent housing problems faced by the young people in short term;
- (d) the proposed youth hostel can provide affordable and decent housing to young people;
- (e) development of youth hostel is positive to youth development, as it encourages social interaction, promotes independence of young people and allows more personal space for the youths;
- (f) other sports, recreation, entertainment facilities, and restaurants and bars can be included in the youth hostel;
- (g) the admission policies of the youth hostel should be restricted to local youth population, taking into account the applicants' income level, workplace, existing transportation cost and living condition, etc. Other restrictions such as the eligibility of applying for the public rental housing should also

be considered;

Opposing Comments

Traffic

- (a) the development would cause adverse traffic impact to the neighbourhood as the nearby road network is already saturated and congested with coaches;
- (b) the TIA has underestimated the traffic flow, as it has neglected the subject site as a tourist hotspot. Although there are 2 coach-parking spaces opposite to the MMTC, illegal parking of coaches and conflicts between buses and coaches are not uncommon.

Environmental and Geotechnical Concerns

- (c) the proposed development will cause adverse environmental impacts including poor air ventilation of the nearby area and noise during construction;
- (d) the applicant did not provide the actual statistics of the actual air pollution caused by the joss burning activities from MMTC in EA;
- (e) the site is not suitable for residential use due to its close proximity to the Man Mo Temple where joss burning activities will cause adverse air quality impact on the residents. The air pollution may still exceed the limits, even though the youth hostel will be installed with air filtration system;
- (f) the site falls within a geotechnical sensitive area. According to the geotechnical appraisal conducted by the Urban Renewal Authority in 2008 for Wing Lee Street, pile work therein would cause cracks and subsidence in buildings and retaining walls in adjacent areas. Although TWGHs has promised to stop the construction works when unusual subsidence is discovered in the site, Man Mo Temple as a declared monument should not be subject to such unnecessary risk;

Building Design

- (g) development intensity and scale of the proposed building is inappropriate and incompatible with the adjacent one-storey MMTC, which will disrupt the heritage setting of the declared monument and cause adverse visual impact on the surroundings;
- (h) the inappropriate scale and design of youth hostel does not respect history and tradition of MMTC, it makes no architectural references to the form and volume of MMTC. Instead, the concrete overhanging over the large void on the ground floor has emphasised the bulk of the new building;

- (i) the site should be retained as a low-rise facility in harmony with the temple;
- (j) the applicant is trying to transfer the PR from the adjacent site to the school site, which should not be allowed after the MMTC was declared a monument in 2010;
- (k) the viewing platforms for appreciation of the MMTC are for residents only, and the Heritage Bazaar appeared to be just a parking area when it is not open;
- (l) the proposed design of the youth hostel is similar to that proposed in the s.12A application submitted in 2015. The application has not addressed the Board members and representatives concerns about the building design raised in the hearing of OZP amendments in 2016;

Land Use Compatibility

- (m) it is inappropriate to develop the existing school site for residential use as it would violate the Man Mo Temple Ordinance which restricts the usage of the property to establishing schools, renovation/repairing the temple, and sponsoring charitable work of the Chinese community;
- (n) the redevelopment of the school site for hostel is incompatible with the planning intention of the “G/IC” site;
- (o) the existing vacant school premises should be reused for other purposes such as elderly facilities, heritage museum, tourist centre, education centre for liberal studies/history, library and multi-purpose rooms;
- (p) the location is inappropriate, TWGHs/Government should consider other vacant premises for youth hostel development;

Heritage Preservation

- (q) not in line with the international Burra Charter and the local “Old Town Central” and “Conserving Central” policy;
- (r) a buffer zone should be provided in accordance with various heritage conservation guidelines;
- (s) the MMTC including the school site should be retained and preserved as a whole;
- (t) abuse of the Heritage Impact Assessment (HIA), which should be done by an independent assessor;
- (u) the high-rise youth hostel does not respect the long history of the school site for education services and the tradition and historical value of MMTC.

11. Planning Considerations and Assessments

- 11.1 The applicant proposed to redevelop the existing 6-storey vacant school building into a 21-storey youth hostel with 302 bed spaces while preserving the existing MMTC. The proposed youth hostel would be up to 96.73mPD at main roof which is within the building height restriction specified for the site.
- 11.2 The Site is zoned “G/IC” which is intended for the provision of Government, institution or community facilities serving the needs of the local residents and/or a wider district, region or the territory. It is also intended to provide land for uses directly related to or in support of the work of the Government, organizations providing social services to meet community needs, and other institutional establishments. The proposed youth hostel is under the YHS which aims to meet the aspiration of youths aged 18 to 30 by giving them a realistic alternative to having their own living spaces for a period of time and providing them with an opportunity to accumulate savings for future development. As such, the proposed development of youth hostel is not incompatible with the planning intention of the “G/IC” zone.
- 11.3 As explained in para 4.4 above, the main reason for the Board to require a planning application to be submitted for the proposed youth hostel was on the building design and how to minimise any adverse visual impact it might have on MMTC. In this regard, the applicant indicated that sensitive building design measures, in particular at the lower level will be adopted to minimise the potential impacts on the cultural and historical significance of the adjacent MMTC. Some of the design elements such as setback of the columns and stair core from Hollywood Road, setback of the tower block, high headroom at G/F, and removal of the fence wall between MMTC and the proposed youth hostel will bring about planning merits in terms of providing better integration with MMTC and opening up the visibility of MMTC when walking along Hollywood Road. To minimize the visual impact of the youth hostel on MMTC, viewing platforms with recessed space and hanging planters are proposed to soften the edge of the building structure. To keep a low profile, milky white tiles will be used for the external wall of the youth hostel. The façade facing MMTC would also be free from any air conditioning platform. These design elements, particularly those on the integration of the youth hostel with MMTC, were considered acceptable by CHO, DEVB and AMO of LCSD.
- 11.4 To give protection to MMTC during the construction of the proposed youth hostel, various devices would be installed to monitor settlement, tilting and vibration at the construction stage and the monitoring devices and monitoring points would be discussed and agreed with the AMO before commencement of the site works so as to ensure no adverse impact on MMTC. These proposals were accepted by the H(GEO), CEDD.
- 11.5 The technical assessments submitted by the applicant have demonstrated that the proposed development would not generate any adverse impacts in terms of geotechnical, traffic, environmental, air ventilation, visual and landscape aspects.
- 11.6 There are public comments raising concerns on the appropriateness of the

proposed development, the structural impact on MMTC, the traffic impact, environmental and geotechnical impacts, excessive building intensity, visual impact, land use incompatibility, heritage and cultural impact, etc. There are also public comments in support of the application. The views given in paragraphs 11.1 to 11.5 above and the comments of the relevant government department in paragraph 9 are relevant.

12. Planning Department's Views

- 12.1 Based on the assessment made in paragraph 11 and having taken into account the public comments mentioned in paragraph 10, the Planning Department has no objection to the application.
- 12.2 Should the Committee decide to approve application, it is suggested that the permission shall be valid until 3.8.2022, and after the said date, the permission shall cease to have effect unless before the said date, the development permitted is commenced or the permission is renewed. The following conditions of approval and advisory clauses are also suggested for Members' reference:

Approval conditions

- (a) the submission and implementation of landscape proposal to the satisfaction of the Director of Planning or of the Town Planning Board; and
- (b) the provision of fire service installations and water supplies for fire fighting to the satisfaction of the Director of Fire Services or of the Town Planning Board.

Advisory Clause

The recommended advisory clauses are attached at **Appendix IV**.

- 12.3 Alternatively, should the Committee decide to reject the application, the following reason is suggested for Members' reference:

the design of the proposed 21-storey hostel development is not compatible with and will have adverse visual impacts on the Man Mo Temple Compound.

13. Decision Sought

- 13.1 The Committee is invited to consider the application and decide whether to grant or refuse to grant permission.
- 13.2 Should the Committee decide to approve the application, Members are invited to consider the approval condition(s) and advisory clause(s), if any, to be attached to the permission, and the date when the validity of the permission should expire.
- 13.3 Alternatively, should the Committee decide to reject the application, Members are invited to advise what reason(s) for rejection should be given to the applicant.

14. Attachments

Appendix I	Application Form received on 18.4.2018
Appendix Ia	Planning Statement
Appendix Ib	Further Information received on 8.6.2018
Appendix Ic	Further Information received on 12.6.2018
Appendix Id	Further Information received on 28.6.2018
Appendix Ie	Further Information received on 12.7.2018
Appendix If	Further Information received on 17.7.2018
Appendix Ig	Further Information received on 26.7.2018
Appendix II	Similar s.16 planning application
Appendix III	Public Comments (whole set)
Appendix IV	Advisory Clauses
Drawing Nos. A-1 to A-20	Floor layouts, section, photomontages submitted by the applicant
Plan A-1	Location Plan
Plan A-2	Site Plan
Plans A-3 to A-5	Site Photos

**PLANNING DEPARTMENT
AUGUST 2018**