

Section 16 Planning Application for Proposed Minor Relaxation of Domestic Plot Ratio and Building Height Restrictions for the URA Kai Tak Road / Sa Po Road Development Scheme (KC-015) (Planning Application No. A/K10/281)

Response to Departmental Comments Table

Nos.	Comments received from:
1.	Director of Environmental Protection (DEP)
2.	Chief Town Planner/Urban Design & Landscape, Planning Department (CTP/UD&L, PlanD)
3.	Director of Social Welfare (DSW)
4.	District Lands Office/Kowloon West, Lands Department (DLO/KW, LandsD)
5.	Commissioner for Transport, Transport Department (C for T, TD)

Appendix 1: Replacement pages of the Environmental Assessment

Appendix 2: Replacement pages of the Visual Impact Assessment

Appendix 3: Replacement pages of the Planning Statement

Appendix 4: Replacement pages of the Application Form

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1. Comments of the Director of Environmental Protection (DEP)	
<i>Received via email dated 10 July 2026</i>	
1. Please state clearly in Section 5 of EA why quantitative air quality impact assessment is conducted.	Noted. It is supplemented in Section 5.6.1 of the replacement pages of the Environmental Assessment (EA) report in Appendix 1 that the separation distances between the ASRs within the Application Site and the nearby roads are insufficient under the Notional Design for the subject S16 Planning Application. Therefore, a quantitative AQIA have been conducted.
2. The conclusion (Section 10) is not matched with Section 5 to 9 in the EA. Please critically review.	The conclusion (Section 10) has been revised to ensure consistency with Section 5 to 9 of the EA report. The corresponding replacement pages are enclosed in Appendix 1 . This revision is only to rectify editorial errors and would not affect the original assessment results/ findings under the EA report submitted on 16 June 2026.
3. Please also submit the Air Modelling files for checking.	The air modelling files have been submitted to EPD separately on 13 July 2026 for review.
<i>Received via email dated 3 August 2026</i>	
1. The applicant (Urban Renewal Authority (URA)) seeks planning permission for the proposed minor relaxation of Domestic Plot Ratio (DPR) and Building Height Restrictions (BHR) for permitted residential development with Government, Institution or Community (GIC), commercial/retail uses, and proposed 'Public Vehicle Park' use for URA's development scheme (KC-015) at Kai Tak Road/Sa Po Road (the Site). The captioned application proposed to be "non-scheme-based" submission for illustration purpose for technical assessment. Based on the findings of the Environmental Assessment (EA) submitted under Planning Statement, insurmountable environmental impact associated with the proposed development is not anticipated and summarized as follows:	Noted with thanks.

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i. On air quality, quantitative Air Quality Impact Assessment (AQIA) has been conducted for the Site and the predicted results indicated that no air sensitive receiver (ASR) is located in the Air Quality Objectives (AQO) exceedance zone at G/F. Thus, adverse air quality impact is not anticipated; ii. On noise and sewerage, insurmountable noise and sewerage impacts are not anticipated. Noise Impact Assessment (NIA) Clause (72) and Sewerage Impact Assessment (SIA) Clause (71) have been imposed under the Agreement and Conditions of Grant by Private Treaty Grant (PTG) executed by URA on 6 March 2026. In this connection, the noise and sewerage impacts arising from the proposed minor relaxation of DPR and BHR will be addressed under land lease mechanism.	
2. On the above basis, insurmountable environmental impacts associated with the proposed development are not anticipated. Hence, we have no objection to the captioned application from environmental perspective. However, we have some comments on the EA as provided in Annex A for follow up please.	Noted. EPD's 'no objection' to the subject S16 Planning Application is gratefully acknowledged. The technical comments on the EA will be addressed accordingly at detailed design stage subsequent to the approval of the subject planning application.
2. Comments of the Chief Town Planner/Urban Design & Landscape, Planning Department (CTP/UD&L, PlanD)	
<i>Received via email dated 3 August 2026</i>	
1. While the proposed increase in BH of about 9m for aboveground carpark is considered reasonable, the proposed increase in BH of about 11m for MiC appeared to be excessive;	Please be clarified that the proposed 11m increase in Building Height (BH) for MiC is a technically necessary solution to facilitate adoption of MiC, delivery of the committed planning gains, accommodate site constraints and further providing urban design merits: • Address the technical requirements for MiC: Under current technology, double slabs between MiC modules are required

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	and typically adopted by current market practice. The floor-to-floor height is required to increase for about 0.15m to accommodate the double slabs thickness. To physically absorb this cumulative thickness along with the 10% GFA exemption for MiC floor areas allowed under JPN No. 8, a BH increase of about 11m (i.e. about 2 additional residential floors) is technically required. Facilitate delivery of committed planning gains: The Scheme would deliver major planning gains committed under the approved DSP, including a 1,000 sq.m. sunken plaza and a 50m tower setback from Prince Edward Road East to enhance wind penetration of the area. These at-grade spatial commitments would inevitably constraint the horizontal building mass and the layout's design flexibility and thus the proposed 11m increase in BH is essential to accommodate the required MiC floor area vertically. Accommodate site constraints: The Application Site is interspersed by two existing buildings, namely the High Place and Carlson Court along Sa Po Road, resulting in an irregular site configuration, which constraints the flexibility and spatial efficiency of the horizontal building layout. The proposed 11m increase in building height directly addresses this physical constraint by allowing the permissible development parameters to be distributed vertically and enable the adoption of a more regular tower footprint that enhances the building's architectural form and fits harmoniously within the surrounding urban fabric. Enhance urban design and visual comfort: Accommodating the 10% exempted GFA for MiC floor areas allowed

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	under JPN No. 8 vertically rather than horizontally provides the design flexibility necessary to further provide design merits that could further enhance urban design and visual comfort for the local built environment, including: - The 11m BH increase allows the Scheme to reduce the number of residential towers to 2 nos. which allows for a much wider building separation between residential towers, enhancing visual and spatial comfort for future residents. - Repositioning the residential towers away from Kai Tak Road opens up the views of the neighbouring developments (e.g. the Carlson Court, AVA 55 and existing developments along Kai Tak Road), enhancing visual permeability and comfort of the surrounding area.
2. The Applicant has submitted a Visual Impact Assessment (VIA) for the Notional Scheme in support of the application. The VIA concluded that the overall visual impacts of the proposed development from the identified public viewing points (VPs) range from “negligible” to “slight” when compared with the approved DSP Proposal, taking into account the existing and planned developments in the surroundings. Design measures including the provision of a sunken plaza of 1,000m² and 50m setback of domestic tower from Prince Edward East as proposed in the approved DSP Scheme are retained in the Notional Scheme. However, the following rectifications should be noted for the VIA:	Noted.
(i) the VIA should be prepared in accordance with the latest promulgated Town Planning Board Guidelines on Submissions of VIA	Noted. The VIA has been updated in accordance with the latest promulgated Town Planning Board Guidelines on submissions of Visual Impact Assessment for Planning

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for Planning Applications to the Town Planning Board (TPB PG-No. 41A);	Applications to the Town Planning Board (TPB PG-No. 41A). The relevant replacement pages of the VIA report have been provided in Appendix 2 .
(ii) VSRs should read key public viewers in accordance with TPB PG-No. 41A;	Noted. The VIA has been updated in accordance with TPB PG-No. 41A. 'The term 'key public viewers' has been adopted, and the relevant updated pages are provided as replacement page of the VIA report in Appendix 2 .
(iii) para. 3.2.1 – as per TPB PG-No. 41A regarding visual envelope, the extent of assessment area should be equal to three times of the <u>actual BH</u> of the proposed development instead of the proposed BH restriction;	Noted. Paragraph 3.2.1 of the Visual Impact Assessment (VIA) has been updated in accordance with TPB PG-No. 41A. The extent of the assessment area has been revised based on three times of the actual building height of the proposed development. Since the actual building height as per the notional design for the Current S16 Planning Proposal is about 134m (i.e. the proposed BHR of 140mPD minus the site formation level of about 6mPD), the visual envelope (VE) is therefore covering a radial area of about 402m (i.e. 134m x 3). Figure 3.1, 3.4 and 5.1-5.7 have been revised and provided in replacement pages of the VIA report are provided in Appendix 2 .
(iv) Table 4.1 – it would be more tenable to grade the sensitivity of VP3 (Kowloon Walled City Park) as <u>high</u> rather than medium;	Noted. The visual sensitivity of VP3 has been updated to "high" in Tables 4.1 and 6.1 in the VIA report, please refer to the replacement pages provided in Appendix 2 .
(v) Tables 4.1 and 5.2 (VP4) – VP4 (the future GIC Complex of KC-017) should be located to the northwest, rather than the west, of the Site;	Noted. The relevant paragraph under Tables 4.1 and 5.2 (VP4) have been updated and provided as replacement page of the VIA report in Appendix 2 .
(vi) Tables 5.2 and 6.1 (VP7) – according to the photomontages, the Notional Scheme would further obstruct the open sky view compared with the approved DSP Proposal. In this connection, the overall visual impact for VP7 (Tung Tau Estate)	Noted. The visual sensitivity of VP7 has been updated to "slight" in Tables 5.2 and 6.1 in the VIA report, please refer to the replacement pages provided in Appendix 2 .

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should be graded as <u>slight</u> rather than negligible;	
(vii) Figure 3.1 – the annotation of VP2 should be shifted to the north of Kai Tak Road in accordance with the photograph on Figure 5.2.	Noted. Figure 3.1 and 5.2 have been updated and provided as replacement page of the VIA report in Appendix 2 .
3. Comments of the Director of Social Welfare	
<i>Received via email dated 3 August 2026</i>	
1. We understand that URA now proposes to seek minor relaxation of domestic plot ration and building height restrictions for permitted residential development at KC-015. According to our previous exchange with URA, SWD has proposed and URA has agreed to incorporate a 100-place Child Care Centre thereat.	Noted.
2. On the understanding that URA will ensure all requirements for the Child Care Centre as stipulated in the Conditions of Grant and Technical Schedule as well as all current and prevailing ordinances and regulations will be fulfilled, and there will be ongoing liaison with us during the detailed design stage, we have no adverse comment on the planning application.	Noted.
4. District Lands Office/Kowloon West, Lands Department (DLO/KW, LandsD)	
<i>Received via email dated 4 August 2026</i>	
1. The application site is located at New Kowloon Inland Lot No. 6658 (“the Lot”) which is held under the Conditions of Grant No. 20457 dated 6.3.2026 (“the Lease”) for a term of 50 years commencing from 6.3.2026.	Noted.
2. Pursuant to SC(12)(c)(ii) of the Lease, the total gross floor area (“GFA”) of any building or buildings to be erected on the Lot for private residential purpose shall not exceed 39,802 m ² . Under the current proposal, the	Noted.

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maximum domestic GFA will be increased to about 42,456 m² which would be in breach of the Lease. Should the planning application be approved by the Town Planning Board (“TPB”), the Grantee is required to apply to Lands Department (“LandsD”) for a lease modification to implement the proposal. However, there is no guarantee that the lease modification application would be approved. If the application is eventually approved by LandsD in the capacity as the landlord at its sole discretion, it will be subject to such terms and conditions including, among others, payment of premium and administrative fee as may be imposed by LandsD.	
3. Noting that more than 2 floors of aboveground car park is proposed under the planning application, the Grantee is required to obtain written approval from the Director of Lands (“the Director”) (subject to payment of any premium and administrative fee as determined by the Director) pursuant to SC(53)(a)(i) of the Lease for not taking into account any parking spaces (including public vehicle park) in any floor in addition to 2 floors of parking spaces at or above the ground level of the building or buildings erected on the Lot for the purpose of calculating the total GFA provided that they have been excluded by the Building Authority from the calculation of GFA under the Buildings Ordinance.	Noted.
5. Commissioner for Transport, Transport Department (C for T, TD)	
<i>Received via email dated 4 August 2026</i>	
1. Unlike the previously approved TIA which featured two run-ins (at Kai Tak Road and Sa Po Road), the revised proposal relies solely on a single run-in at Sa Po Road. This arrangement increases the likelihood of traffic queues tailing back onto public roads.	Please note that the proposed vehicular access arrangement proposed under Section 2.2 of the Traffic Impact Assessment (TIA) report submitted on 16 June 2026, with one ingress at Sa Po Road and one egress at Kai Tak Road for all types of vehicles, aligned with the

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Consequently, the applicant shall provide detailed assessments and mitigation measures to prevent traffic queue from building up on the public road network under this revised scheme.	arrangement under GBP submission approved in February 2026. Meanwhile, the proposed vehicular access arrangement has paid due considerations to prevent any potential traffic queue. A drop bar with an integrated camera system will be installed to minimize operation time, as a result vehicle queuing on Sa Po Road is not anticipated. Additionally, any potential queuing will be accommodated entirely within the site boundary along the internal ramp through active traffic management and physical design, ensuring Sa Po Road remains completely clear from traffic tailbacks.
2. I have no comment on the following proposed parking and L/UL spaces to be provided within the Development provided that the relevant lease conditions are complied with:- <u>For Residential Use (310 units < 40m², 682 units >40m² but <70m² in 2 towers)</u> 69 ancillary PC parking spaces, 10 visitor PC parking spaces, 10 MC parking spaces and 2 L/UL spaces for HGV; <u>For Non-Industrial Use (GFA: 5307m²)</u> 27 PC parking spaces, 3 MC parking spaces, 5 L/UL spaces for HGV and 2 L/UL spaces for LGV; and <u>PVP</u> 217 PC parking spaces	Noted.
3. Figure 2.4 - Given the reduction in PVP parking spaces from 300 to 217 and the keen demand for parking spaces in Kowloon City Area, the applicant shall retain the existing on-street metered parking spaces at Sa Po Road and Kai Tak Road as far as practicable, in particular at locations not directly affected by the proposed run-in/out.	Please note that the aim of the subject S16 Planning Application is to seek minor relaxation of DPR and BHR to facilitate adoption of MiC and above-ground car parking at the Application Site. The concerned on-street metered parking spaces along Sa Po Road and Kai Tak Road fall outside the boundary of the subject Application

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	Site and the scope of the subject S16 Planning Application. While it is noted of TD's concern on the arrangement of the on-street metered parking spaces adjoining the site, on-going liaison with TD would be made separately to reach an agreement with TD during the detailed design/ construction stages of the Project subsequent to the approval of this S16 Planning Application.
4. Table 5.3 and Table 5.4 on Pedestrian Walkways LOS - Please substantiate why the pedestrian flows for 2033 Design Scenario (with KC-015)(s16) are in general lower than that for 2033 Reference Scenario (without KC-015) (without s16) at PM Peak.	With reference to pedestrian walkway assessment methodology provided under Section 4.2.3 of the TIA report submitted on 16 June 2026, please be clarified that the 2033 Reference Scenario does not represent the scenario without KC-015, but represent the scenario with the Approved DSP but without the subject S16 Planning Application, while the 2033 Design Scenario represent the scenario with the subject S16 Planning Application. The pedestrian flow for the 2033 Design Scenario (i.e. with the subject S16 Planning Application) is derived by taking the 2033 Reference Scenario baseline (i.e. with the Approved DSP but without the subject S16 Planning Application) and applying the net difference in pedestrian trip generation resulting from the adjusted development parameters with the subject S16 Planning Application. Under the notional design for the subject S16 Planning Application, the retail plot ratio and its corresponding GFA have been reduced. As such, this reduction in retail floor area results in lower pedestrian trip generation during the PM peak period as shown in Table 4.10 of the TIA report submitted on 16 June 2026, which cause the PM peak pedestrian flows in the 2033 Design Scenario (i.e. with the subject S16 Planning Application) appears lower than that in the 2033 Reference Scenario (i.e. with the Approved DSP but without the subject S16 Planning Application).

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5. It is noted from Figure 2.2 at Appendix A of the TIA that the proposed 2 levels of aboveground car park will occupy less than 10m of building height. TD is not in a position to comment on the proposed building height relaxation of 20m which exceeds the spatial requirement for the 2 levels of aboveground car park.	Noted.