

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)

Responses to Public Comments

Para.	Summary of Public Comments	URA's Responses	Relevant to Public Comment No.
Concerns on potential traffic impact and public vehicle park (PVP) provision			
1.	<u>Concerns on reduction in PVP provision and unassessed cumulative demand</u> The Paragraph 7.9 of the ES of the approved DSP committed an underground public vehicle park of about 300 spaces to address a recognised local shortfall. The current application proposes to reduce the PVP provision to 217 spaces (a ~27.7% reduction), which is justified only by a narrow study area that fails to model the event-day demand of the upcoming Kai Tak Sports Park, notwithstanding the Scheme's role as a key gateway and connection. According to the Legislative Council Panel on Development Affairs meeting dated 28 April 2026 (LC Paper No. CB(1)405/2026(02) / minutes LC Paper No. CB(1)494/2026), and Kowloon City District Council Traffic and Transport Committee papers (2026), there was concerns about reduction of PVP would be inadequate for future demand once Kai Tak Sports Park event-day coach and visitor traffic is taken into account. When KC-015 and KC-017 are read together, area-wide public parking in eastern Kowloon City are being materially	Please noted that that the reduction of PVP provision from 300 nos. under the Approved DSP to 217 nos. has consulted Kowloon City District Council (KCDC) in May 2025 and KCDC had no objection to the proposal. The reduction of PVP provision was based on the updated parking demand and supply assessments outlined in the Technical Note on Public Vehicle Park for KC-015 (the Technical Note). The Technical Note confirmed that only 195 nos. of PVP parking spaces would be adequate to satisfy the local parking demand. Nevertheless, to adopt a conservative approach, 217 nos. of PVP car parking spaces (which includes 22 surplus spaces) are proposed in the current S16 Planning Proposal to address the parking demand estimate. The Technical Note was submitted to TD for comment, and received no in-principle objection from Transport Department (TD) in April 2025 . As discussed and agreed with TD, the study area of the Technical Note did not include the Kai Tak Development Area (KTDA), as the Kowloon City area and the KTDA are physically separated by a major road (namely Prince Edward Road East), while the Kai Tak Sports Park is more than 1km away from KC-015, it is considered highly improbable that visitors or coach traffic would park at KC-015 and then walk to the Kai Tak Sports Park. As such, the parking demand of the KTDA is considered technically irrelevant to the Scheme.	1

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	reduced as a major new demand generator comes online, TD's no-in-principle-objection on reduction of PVP could not address the aggregate effect per application. A revised cumulative parking demand-and-supply study should be provided for the Board's review.		
2.	<u>Concerns on the impact of above-ground carpark on street vibrancy</u> Paragraph 7.9 of the ES of the approved DSP tied the underground PVP to creating "a solution space and... pavement widening in the surrounding area." Relocating parking into a 5-storey above-ground podium removes that mechanism, with the loss of most acute at Carpenter Road frontage and the new private road dedicated to public use. Relocating underground carpark to aboveground would remove vitality from the streetscape.	Please be clarified that relocating a portion of the underground carpark to aboveground levels will not affect the provision of G/F retail shops and street frontage of the Scheme and the "private road for public use" will be retained under the subject S16 Planning Proposal. Under the notional design of the subject S16 Planning Proposal, the aboveground carpark is proposed on 1/F to 4/F of the podium floors which will not affect the G/F retail shops and street frontage of the Scheme, and thus the street vibrancy of the area could be maintained. Meanwhile, the Scheme will provide a split-level sunken plaza of about 1,000sq.m. which will incorporate retail components, sitting area and event space for place-making opportunities to further enhance vibrancy of the neighbourhood. Furthermore, the "private road for public use" under the Approved DSP has been retained. As demonstrated in the Notional Block Plan of the subject S16 Planning Proposal (Figure 3.1 of the Planning Statement refers), an area has been reserved to accommodate this private road for public use.	1,2

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Concerns on potential visual impact			
3.	<u>Enlarged podium bulk and a potentially misleading VP</u> The podium increases from three to five storeys. At VP2, the podium dominates the view, yet the VIA provides no façade treatment for the enlarged podium and relies on wide-angle photomontages that understate the added mass at the pedestrian scale, which is misleading.	Please be clarified that the Visual Impact Assessment (VIA) submitted for the subject S16 Planning Application was prepared in accordance with the Town Planning Board Guidelines (TPB PG-No. 41A), under which façade treatments are not the visual impact consideration under the Guidelines. The detailed architectural design and façade treatments will be carefully considered and confirmed during subsequent detailed design stage. In accordance with the TPB PG-No.41A, the locations of all selected viewpoints in the VIA (including VP2) have been carefully selected and complied with TPB PG-No. 41A requirements to ensure an objective assessment of the building bulk and massing. The photomontages provided could effectively reflect a future notional building mass of the Scheme (including building mass of the podium) at pedestrian scale.	1
4.	<u>Potential wall effect and the reduction in sunlight penetration</u> Potential impact of the wide and high wall effect podium has been ignored. There is no image of visual impact on the streetscape, nor any indication of the impact on sunlight penetration to the streets and surrounding buildings resulting from the bulky podium and wall effect of the proposed higher towers.	Please note that a VIA has been conducted to assess the potential visual impact arising from the proposed increase of BHR from 120mPD to 140mPD based on the notional building bulk (including the podium) of the subject S16 Planning Proposal. The findings of the VIA shows that the minor relaxation of BHR will induce no adverse visual impact and the photomontage shows that the notional design of the podium is compatible with the surrounding environment with no anticipated wall effect. Meanwhile, detailed podium,	2

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		streetscape, and micro-climate (such as sunlight penetration) design considerations, are detailed design matters that will be considered and accommodated as appropriate at detailed design stage subsequent to approval of the subject S16 Planning Application.	
5.	<u>Concerns on compatibility with existing and planned surrounding context</u> The potential "wall effect" will overwhelm the surrounding developments that are 80mPD and less.	Please be clarified that the proposed minor relaxation of BHR from 120mPD to 140mPD is highly compatible with the existing and planned surrounding planning context. It fits harmoniously within the established stepped building height profile of the area, which gradually descends from inland area where buildings across Carpenter Road, i.e. Billionaire Royale and Le Billionaire with building height of 170mPD & 145mPD respectively, down to the proposed 140mPD of the subject S.16 Planning Application, and then the Kai Tak area where buildings step down from 135mPD/125/115/100mPD at KTDA to 55mPD near the waterfront. The proposed building height is well fit in the stepping profile and thus potential "wall effect" is not anticipated. Besides, the Scheme will provide a split-level sunken plaza of about 1,000sq.m. , which creates a 40m buffer distance between residential towers and Prince Edward Road East, which will create visual and spatial comfort in the surrounding dense urban context. Furthermore, the VIA conducted for the subject S16 Planning Application has demonstrated that the proposed BHR of 140mPD is visually compatible with the local context, and no adverse visual impact anticipated.	2

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Concerns on retail connectivity			
6.	<u>Retail element disconnect from the sunken plaza</u> It is a stated objective of the DSP that "commercial space will be provided connecting to the sunken plaza to enable extension of vibrant retail activities from the underground shopping street (USS) of the Kai Tak Development Area (KTDA)" (ES Paragraph 7.5). The current notional scheme disconnects the retail element from this plaza which defeating the objective. This paradoxically reduces the retail's own attractiveness, which depends on the footfall from the plaza and USS. A binding approval condition requiring retail seamlessly connected to the sunken plaza should be required, notwithstanding the non-scheme-based nature of the submission.	Please be clarified that subject S16 notional design would not disconnect the retail element from the sunken plaza. The Scheme is strictly bounded by the statutory planning intention of the subject 'R(A)' zone that "is intended primarily for high-density residential developments with the provision of a sunken plaza and underground public vehicle park. Commercial uses are always permitted on the lowest three floors of a building or in the purpose-designed non-domestic portion of a building connecting to the sunken plaza.". It is the planning intention of the Scheme to provide commercial/retail uses connecting to the sunken plaza and to connect with KTDA via the USS to extend the vibrant retail activities of the wider area. As the planning intention of the subject R(A) zone is already statutory binding in nature, imposing an extra approval condition with similar purpose to enforce the provision of retail connection with the sunken plaza is considered not necessary.	1
Concerns on reduction of retail floor area			
7.	<u>Unsubstantiated retail reduction and relocation commitments to Lung Shing operators</u> The URA previously committed that affected local "character shops" in KC-015/KC-017 could relocate back ("回遷") into the projects to preserve the unique Chiu-Chow/Thai character and small-shop atmosphere of the "Lung	The subject S.16 planning application aims to provide flexibility in future design to increase the domestic PR up to 8.0, with total PR remains at 9.0. There is no restriction to the non-domestic PR to 1.0. There is still flexibility to provide more non-domestic PR for commercial/retail uses to meet the market needs if required. Besides, under the notional design of the subject S.16 planning application, the reduced non-domestic GFA would not	1

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	Shing" area. Reports indicate over 60% of these shops joined the relocation/return scheme, with most selecting KC-015 due to its earlier completion. Reducing KC-015's retail floor area directly undermines the return capacity the URA promised the community. The application should not be supported unless a full DFS report and a quantified retail GFA schedule (approved DSP vs. proposed) are provided.	affect the G/F retail shops, street frontages and street-level vibrancy, and thus will not undermine the return capacity for shops with Chiu-chow/ Thai characters that URA promised to the local community. URA has offered the "Special Arrangement for Preserving Local Character" (保留地區特色特別安排) (the "Special Arrangement") to provide priority leasing (優先租用) and concessionary rents (特惠租金) to the affected operators of the Scheme to facilitate eligible operators (e.g. affected G/F shop operators of the long-established local/Thai eateries and local organizations/ institutions serving the Chiu-Chow/Thai communities) in continuing their businesses within the district. For those operators who signed the memorandum with URA will be able to return to the completed development in-future to lease the ground floor shops to continue their businesses. Furthermore, full Development Facilitation Services (DFS) report and quantified retail GFA schedule are detailed design and operational leasing matters that fall outside the scope of this S16 Planning Application that will be finalized during the detailed design stage subsequent to obtaining the subject S16 planning approval.	
Concerns on planning merits and development control accountability			
8.	<u>Absence of net public planning and design gain to justify the relaxation</u> DSP Notes Remark 8 and ES Paragraph 7.4 permit	Please be clarified that the subject S16 Planning Application is well supported by the following additional planning and design merits when compared with the Approved DSP Proposal:	1, 2

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	relaxation of development restrictions based on "individual planning and design merits." The merits advanced (MiC under JPN No. 8, above-ground carpark under PNAP APP-2, financial viability, marketability and housing supply) are predominantly proponent-side justification. The only arguable public design merit is lower permeability arising from the reduction from three to two towers. The application does not demonstrate a net planning gain exceeding the approved scheme. The justification of enhancing financial viability and increasing housing supply departs from the URA's statutory mandate to improve living environments and reduce density in congested urban areas.	• Deliver Environmental and Social Gains through MiC Adoption: The subject S16 Planning Application facilitates the adoption of MiC to the Scheme, which would optimize environmental and social benefits by reducing construction waste, enhancing site safety, shortening construction timelines, and shifting primary fabrication off-site to minimize localized noise and dust impacts on the neighborhood. • In line with the Government's initiatives of facilitating above-ground carpark design and deliver design merits: The subject S16 Planning Application facilitates reduction of basement car park to two storeys and relocate a portion of the carpark to above ground levels, which could minimize potential excavation risks and potential structural impacts on adjacent buildings. It is also a response to the Government's initiative to facilitate the provision of above-ground carpark in development projects as promulgated in PNAP APP-2. • Increase housing supply to alleviate housing shortage: The subject S16 Planning Application also facilitates minor relaxation of DPR from 7.5 to 8, which is in line with the strategic housing policy of increasing housing supply in Hong Kong. Based on the notional design for the subject S16 Planning Application, it is anticipated that the Scheme could provide about 992 nos. of residential units, which contributes to the housing supply for alleviating the problem of housing	

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		shortage in Hong Kong.	
9.	<u>Non-scheme-based submissions weakens accountability for public benefits</u> The parameter uplifts become binding entitlements, while the public-benefit design elements revert to non-binding indicative status, to be resolved later with a joint-venture developer — noting that the 2024 tender attracted a single bid and was not awarded. This risks capture of the development upside while public gains remain unenforceable.	Please note that the Application Site is zoned “R(A)” in the approved DSP. There is no change of the zoning of the Application Site in the subject S16 Planning Application. Under the Schedule of Use of the subject “R(A)” zone under the DSP, residential development (“Flat” use), with commercial/ retail uses on the lowest three floors, are always permitted uses as of right. The “R(A)” zone only controls the maximum domestic plot ratio (DPR), maximum total plot ratio (PR), and maximum building height restriction (BHR), while minor relaxation of such may be considered by the Town Planning Board (TPB). The control under the “R(A)” zone provides the necessary design flexibility without control on the specific form and layout of the future development, which is considered necessary to facilitate project implementation. The non-scheme-based approach under the subject S16 Planning Application which seek minor relaxation of DPR to 8.0 (total PR remain unchanged as 9.0) and BHR to 140mPD, follows the same spirit as the control provided under the subject “R(A)” zone which provides the necessary design flexibility for project implementation during detailed design stage, while ensuring the future development remains strictly bounded by the maximum permissible parameters approved by TPB. The design flexibility allowed in the non-scheme-based approach enables the future development to respond dynamically to site-specific constraints	1

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		and market needs during the detailed design stage. Upon the subject S.16 planning approval, the Scheme will proceed with detailed design and subsequent GBP submissions for relevant government departments' approval, a concrete scheme layout can only be developed at the detailed design stage/ GBP submission stage for implementation. Throughout the implementation process, the URA, as a statutory public body, will actively safeguard, enforce, and optimize the overall urban design quality and committed public gains.	
Concerns on potential air ventilation impacts			
10.	<u>Elimination of the east-west ventilation corridor without any updates to the Air Ventilation Assessment (AVA)</u> The original 2020 approval linked the permitted height increase to "slimmer building design and wider building gaps," and the previous AVA raised no adverse comments on the approved three-tower form (TPB Paper No. 10542, Paragraph 9.1.11 refers). The proposed two-tower scheme with an enlarged 5-storey podium eliminates the east-west ventilation corridor, yet the application provides no update to AVA and conflates "no adverse air quality impact" (a vehicular-emission assessment) with air ventilation and breathability, which is a distinct matter. Building height and podium bulk are	Please be clarified that as demonstrated in the AVA report of the 2020 approved DSP, which is subsequently incorporated in the ES of the Approved DSP, the Scheme shall provide the following air-ventilation-related good design features: • Provision of the split-level sunken plaza; • A 50m setback of domestic tower (at above 15m) from the intersection point of site boundary where Kai Tak Road and Prince Edward Road East meet); and • Provision of building design elements (e.g. building separation) in accordance with the Sustainable Building Design Guidelines (SBDG). As all air-ventilation-related good design features will be fully retained and incorporated into the subject S16 Planning Proposal, a fresh AVA is considered not necessary. Meanwhile, the subject S16 Planning	1

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	recognised dominant inhibitors of pedestrian-level airflow. A fresh AVA for the revised form should be required.	Proposal has maintained the following air ventilation measures to enhance the east-west air flow with with minor adjustments introduced: • Retain the 11m-wide gap between towers to facilitate penetration of the prevailing annual eastern wind; • Retain the provision of the split-level sunken plaza and 50m setback of towers from Prince Edward Road East to ensure penetration of the prevailing summer south-western wind. • The non-critical 13m-wide gap (flowing from Carpenter Road via the narrow strip between The High Place and the Application Site) has been omitted, as northern wind does not represent a major prevailing wind direction for the area (which is dominated by eastern wind annually and south-western wind in summer).	
11.	<u>Apartment layout will enjoy less cross-ventilation</u> The reduction in the number of towers from three to two means the layout of the apartments will enjoy less cross-ventilation. Apartments with windows facing a single direction experience single-sided ventilation, causing stagnant air, heat buildup, and high moisture, which leads to excessive dependence on air conditioning.	Please be clarified that detailed layout of individual residential units (including location of the windows) and micro-climate (including air ventilation performance within individual units) are detailed design matters that will be finalized at detailed design stage subsequent to approval of the subject S16 Planning Application.	2
Concerns on elements of notional design			
12.	<u>Concern on Site Coverage</u>	Please be clarified that the indicative site coverage for the subject Section 16 Planning Application has fully adhered to	2

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	The proposed site coverage substantially exceeds the guidelines.	the First Schedule of Building (Planning) Regulation on the site coverage requirement. As the subject site is a Class C site, the notional design is fully adhered to a Class C site with building height exceed 61m, which the site coverage is permitted up to 40% for the domestic portion, up to 65% for the non-domestic portion above 15m, and up to 100% for the non-domestic podium of 15m or below. The actual site coverage will be determined in detailed design stage.	
13.	<u>Reduction in Public Realm and Open Space</u> The proposed scheme results in the elimination of existing alleyways, public parks, recreation grounds and open spaces.	Please be clarified that the Scheme aims to rationalise land uses through replanning and restructuring to optimise the site's development potential. Through restructuring the underutilized back lanes and pocket-sized open spaces, the Scheme would introduce a split-level sunken plaza of about 1,000sq.m., that will be opened for public use and will provide retail components, sitting area and event space for place-making opportunities to enrich users' experience and at the same time enhance walkability and connectivity of the area. There is no large-scale public park nor recreation ground exists within the Scheme area, except a small sitting-out area next to Prince Edward Road East. Furthermore, the proposed development of the Subject S.16 planning application will also provide sufficient local open space in accordance with the HKPSG requirement of 1 sq.m. per person.	2