Appendix I

Justifications for Parking Provisions

Annex A: Parking Provision Justification

1 INTRODUCTION

1.1 Objective

- 1.1.1 The objective of this technical note is to present the proposed car parking and loading/unloading provisions for the proposed redevelopment at No. 4 Tung Yuen Street in Yau Tong, Kowloon, and present justifications in support of adopting the low-end provisions as state in Chapter 8 of the Hong Kong Planning Standards and Guidelines (HKPSG).
- 1.1.2 The justifications presented herein for the proposed provisions are unique and specific for No. 4 Tung Yuen Street Redevelopment, pertaining to infrastructure already constructed and commissioned, and site settings and constraints.

1.2 Development Parameters

1.2.1 The design parameters for the Proposed Development are summarised in **Table 1.1**:

Parameters	Units	
Application Site Area	Approx. 2,419 m ²	
Total Plot Ratio	Not more than 6.9	
Total GFA	Not more than 16,691.1 m2	
Domestic GFA	Not more than 14,514 m ²	
Non-Domestic GFA	Not more than 2,177.1 m ²	
Total Number of Residential Blocks	1	
Total Number of Units	342	
Average Unit Size	About 43 m ²	

 Table 1.1
 Design Parameters for Proposed Development

1.2.2 The parking provision of private residential uses is generally determined with reference to Hong Kong Planning Standards and Guidelines (HKPSG), in which the "Global Parking Standard" (GPS) has a range of <u>1 space per 4 to 7 units</u>, where various adjustment factors are applied to cater for the variation of parking demand associated with flat size (R1), proximity of rail station (R2) and development intensity (R3) respectively, which are tabulated in **Table 1.2** below:

Table 1.2	Parking Requirements by HKPSG for Private Housing	g Developments	(AUG 2021 Edition)

Parking Facilities	HKPSG Requirement	Adj. Flat Size (m ²) Factor		No. of Units	Required Provision (R1 x R2 x R3 / GPS / no. of units)	
			(R1) ⁽⁺⁾		Low-end	High-end
	1 space ⁽²⁾ per <u>4-7 flats</u> with adjustment factors on flat sizes R2 = 1.0 (Outside a 500m-radius of rail station) R3 = 0.9 (Domestic PR > 5.0)	<40	<u>0.5</u>	139	9	16
		40-70	<u>1.2</u>	158	25	43
		70-100	<u>2.4</u>	43	14	24
Car Parking Spaces		100-130	<u>4.1</u>	0	0	0
		130-160	<u>5.5</u>	0	0	0
		>160	<u>7.0</u>	2	2	3
			Total	342	50	86

Parking Facilities	HKPSG Requirement	Adj. Flat Size (m ²) Factor		No. of Units	Required Provision (R1 x R2 x R3 / GPS / no. of units)	
		(R1) ⁽¹⁾	(K1)(-)		Low-end	High-end
		No. of units per resident parking		6.8	4.0	
Visitor Parking Spaces	<u>5 spaces</u> per block	1 Blocks			Į	5
Retail	1 per <u>150-300m²</u> GFA	2,177.1 m ²		8	15	
				Subtotal	63	106

Note:

(1) Demand Adjustment Ratio (R1) on flat size according to the latest HKPSG requirements;

(2) Accessibility Adjustment Ratio (R2=1) and Development Intensity Adjustment Ratio (R3=0.9) have been both incorporated according to the latest HKPSG requirements.

1.2.3 To further account for the site-specific conditions and district characteristics in determining the appropriate level of parking provision, it is also suggested in HKPSG (Chapter 8 Section 7.1.3) to consider the following factors in practical terms:

- (A) Availability of public transport services in the vicinity
- (B) Availability of public car parks in the vicinity
- (C) Proximity to and quality of pedestrian access linking railway stations and other major public transport interchanges
- (D) Traffic conditions of local road networks
- (E) Parking demand and supply condition in the vicinity

2 AVAILABILITY OF PUBLIC TRANSPORT SERVICES

2.1 Evaluation for the Proposed Development

- 2.1.1 With reference to HKPSG (Chapter 8 Section 7.1.1), the provision of parking spaces should be compatible with Government's overall transport policy to promote the use of public transport with railway as backbone. As a general principle, parking should be provided at a level which will not unduly attract potential passengers to use private vehicles in preference over public transport. In particular, for developments which are close to railway stations and large public transport interchanges, lower parking standards should be adopted.
- 2.1.2 For the Proposed Development at No.4 Tung Yuen Street, the existing PT choice is accessible by KMB Route 14X and GMB Route 24. Furthermore, franchised bus and GMB stops are located in Shung Tak Wai, which are immediately east of and adjacent to the project site.
- 2.1.3 In addition, there are one MTR station (Yau Tong Station) and two public transport interchanges (PTI) all located within approximately 500m from the project site. The existing public transport services area summarised in **Table 2.1**.

Route / Metro Line	Service	Destinations	Nearest Stop	Peak Hour Frequency	Approximate Walking Time
14X	KMB	Shung Tak Wai – Tsim Sha Tsui	Shung Tak Wai	20-25 mins	< 3 mins

able 2.1	Existing	Public	Transport	Services

Route / Metro Line	Service	Destinations	Nearest Stop	Peak Hour Frequency	Approximate Walking Time
24	GMB	Lam Tin (Kai Tin Shopping Centre) – Lei Yue Mun	Shung Tak Wai	10-20 mins	< 3 mins
Kwun Tong Line	NATO	Whampoa - Tiu Keng Leng	Yau Tong	3-5 mins	9 mins
Tseung Kwan O Line	IVITK	North Point – Po Lam / LOHAS Park	Station	3-5 mins	8 mins
Ferry	Ferry	Sai Wan Ho - Sam Ka Tsuen	Sam Ka Tsuen Ferry Pier	24-30 mins	9mins

2.1.4 Therefore, in terms of public transport services, the Proposed Development is considered to be very accessible to public transport as compared with other existing developments in Tung Yuen Street.



Figure 2.1. Location of Surrounding Public Transport

3 AVAILABILITY OF PUBLIC CAR PARKS

3.1 Public Car Park in the Vicinity

3.1.1 There are a total of 456 publicly accessible car parking spaces provided at the Montego Bay, One East Coast, and Lei Yue Mun Municipal Services Building. These parking facilities are located within 550m catchment area from the project site, the location of surrounding public car park is shown in Drawing 3.1. A summary of parking spaces in the nearby public car parks is shown in Table 3.1.

Table 3.1 Surrounding Publi	c Car Park Provisions
Public Car Park	Provided Parking Spaces
Montego Bay	122
One East Coast	240
Lei Yue Mun Municipal Services Building	94
Total	456





Figure 3.1. Location of Surrounding Public Car Park

3.1.2 The car parking utilization of the nearby public car parks was reviewed to determine the availability of excess parking. Based on general observations in a normal weekday in February 2025, the total number of surplus car parking spaces available at the nearby car parks that were not utilized is approximately 127, and the occupancy rate of surrounding public car park is about 72%, the publicly accessible parking spaces are still excess capacity available. The detail of occupancy rate of each public car park is shown in Table **3.2**.

Table 512 Sufforming Fable carry and occupancy				
Public Car Park	Provided Parking Space	Available	Occupancy Rate	
Montego Bay	122	34	72%	
One East Coast	240	62	74%	
Lei Yue Mun Municipal Services	94	31	67%	
Building				
Total	456	127	72%	

Table 3.2	Surrounding Public Car Park Occupancy

3.1.3 Therefore, the Proposed Development is considered to be accessible to considerable public car parking facilities in the vicinity.

4 PROXIMITY AND QUALITY OF PEDESTRIAN LINKAGE TO RAIL AND PUBLIC TRANSPORT

4.1 Evaluation for the Proposed Development

- 4.1.1 All the public transport facilities are directly adjacent to or within close walking distance to the project site and most of the facilities are connected with pedestrian access.
- 4.1.2 In addition, there are clear pedestrian access linkage including pedestrian walkway, and crosswalks located immediately adjacent to and in close vicinity to the project site. These pedestrian linkage facilities provide both direct and convenient access to the surrounding land uses and public transport services.



Figure 4.1. Pedestrian routes between the Development and Public Transport in the Vicinity

- 4.1.3 In the future, with the development of Yau Tong Bay Comprehensive Development Area, the provision of open space and pedestrian linkage will be improved as well. Therefore, the pedestrian linkage from subject site to public transport will be more accessible.
- 4.1.4 The Yau Tong MTR station is located within approximately 500m from the project site, which is considered walkable by a sizable population. On the other hand, the quality of the walking route itself is considered relatively well, and as the developed of Yau Tong Bay Comprehensive Development Area, the pedestrian linkage will be improved.

5 TRAFFIC CONDITIONS OF LOCAL ROAD NETWORKS

5.1 Evaluation for the Proposed Development

- 5.1.1 Based on the TIA under the S16 planning application (No. A/K15/132), the traffic generation by the Proposed Development can be well absorbed by the external road network with the proposed road improvement works around the area.
- 5.1.2 Therefore, coped with the fact that there are other planned and committed developments in the area, the future traffic condition is expected to be at acceptable levels upon design year 2035, subjected to the implementation and programme of the committed road improvement schemes by others.

6 PARKING DEMAND AND SUPPLY CONDITION

6.1 Evaluation for the Proposed Development

- 6.1.1 As previously noted in paragraph 3.1.2, there are about 456 existing publicly accessible car parking spaces located within 550m catchment area from the project site with excess capacity available.
- 6.1.2 Additionally, the public parking service could be coordinated by Hong Kong e-Mobility App, allowing users to check the real-time information on the availability of public parking in facilities across Hong Kong.
- 6.1.3 This type of service would enable users more flexibility and options in their selection of parking facility near the site, by creating "shared-use" parking opportunity and therefore, providing more efficient use of the district-wide parking facilities.
- 6.1.4 The parking demand and supply conditions in the vicinity can also be reflected by the level of illegal parking in the surrounding road network.
- 6.1.5 In case of a significant shortfall in background parking provision where demand for facilities substantially exceeds supply, illegal parking is expected to be commonly observed on kerb-side. On the other hand, the parking provision may consider adequate if there are no records of illegal parking in the vicinity.
- 6.1.6 To reveal the level of illegal parking in the vicinity of the Proposed Development relevant to the subject development, MVA conduced on-site visit several times along Tung Yuen Street and Ko Fai Road. It is worth noting that no illegal parking was observed around the project site.
- 6.1.7 Therefore, the parking provision could adequately cope with the parking demand in the vicinity of Proposed Development.

7 LOCAL CATCHMENT OF PROPOSED RETAIL COMPONENT

7.1 Evaluation for the Proposed Development

7.1.1 The proposed retail GFA of 2177.1 sqm is of a relatively small scale and is intended for neighbourhood retail uses which serve demands locally or even from the residents within the site.

7.1.2 Thus, the car parking demands arising from the proposed retail component are considered to be very minimal. The low end of the parking provision (<u>1 car space per 300 sqm retail GFA</u>) is adopted for retail, which is 8 nos. of retail parking.

8 JUSTIFICATION FOR PROPOSED LOADING/UNLOADING PROVISIONS

8.1 **Operational Requirements**

8.1.1 The detail of loading/unloading bay provision as shown in **Table 8.1**.

Table 8	.1 Loading/Unloading	<mark>g Provision</mark>	
Type of Development	HKPSG Requirement	GFA/Block	No. of LUL
Retail	<mark>1 per <u>1,200m²</u> GFA</mark> (low-end)	GFA 2,177.1 m ²	2
Residential	1 per each housing block	<mark>1 block</mark>	1
		Total	<mark>3</mark>

- 8.1.2 The project site will be re-developed into a residential block with 2177.1 sqm commercial area, primarily comprising small retail shops. Therefore, the goods delivery demand for a small-scale commercial area will be considered as minimum and no large cargo or furniture expected. This means that each goods vehicle delivery trip can serve more than one tenant in the retail area.
- 8.1.3 Pre-booking schemes can be arranged with management office. Pre-booking delivery arrangement would distribute the delivery demand throughout the day. And 2 loading/unloading bays for retail can be shared use. As a result, it could effectively arrange the deliveries to maximize the usage of the loading/unloading bays without over-provision to address uncertain peak demands.

9 SITE CONSTRAINTS TO ADOPT HIGH-END CAR PARKING PROVISIONS

9.1 Current Master Plan Layout

9.1.1 Additionally, the HKPSG states:

"Request for provision lower than the parking standards may be considered by TD for small sites, sites with severe constraints, or those carrying unique circumstances, on a case-by-case basis. In handling these requests, TD may consider factors including but not limited to, area and shape of the site, technical constraints attached to the site, insurmountable difficulties of construction of excessively deep levels of basement car parks, significant impact on delivery of flat yield, etc. "

And,

"For any particular on-street location or off-street development, consideration of all of the above factors and deciding on the appropriate level of provision of parking facilities will be the responsibility of the Transport Department (TD). Flexibility may be allowed, within and beyond/below the standard ranges, to meet special circumstances such as redevelopment in the built-up urban areas with severe site constraints. If any project proponent wishes to appeal against the decision of TD, it may provide justifications to TD for further consideration. In consultation with relevant bureaux/departments, TD may determine an appropriate parking provision for such site. "

- 9.1.2 As per current master layout plan (as in Figure 9.1), through maximizing 2 floors in basement levels (B1 and B2) a total of 63 parking spaces are provided to meet the low end parking provision requirement according to HKPSG. A 5m-wide public pedestrian passageway connecting Tung Yuen Street to the 15m-wide voluntary waterfront promenade running along the entire depth of the site can be accommodated in this master layout plan. This can provide significant public planning gain for enabling public's access and enjoyment of the waterfront.
- 9.1.3 If car parking provisions which are higher than the aforesaid provisions are to be accommodated, additional floor/s for the car park would be necessary while maintaining the submitted domestic and non-domestic plot ratio and GFA. However, certain site constraints limit the potential for adding these additional floor/s.



Figure 9.1 Current Master Layout Plan of GF, B1 and B2

9.2 Technical Constraints of the B3 Parking

- 9.2.1 The proximity of the site to the seawall presents challenges for deep basement construction and car park excavation works near the seawall due to unpredictable underground conditions, concerns regarding the seawall's structural integrity, and safety issues related not only our subject site but also to adjoining developments. These factors introduce technical uncertainties that complicate the development process and will seriously delay the anticipated construction programme. As a result, the delivery of promenade for general public's enjoyment will be seriously delayed.
- 9.2.2 An analysis of the basements in the nearby waterfront development, The Coast Line I, also highlights the seawall's impact on basement excavation limits. The cross section of The Coast Line I (Figure 9.2) indicates that the basement walls will be set back from the seawall by over 15m, which encompasses the width of the entire promenade.



Figure 9.2 Cross Section of The Coast Line I (Source: Sales Brochure for The Coast Line I)

9.2.3 Since there is sea wall structure under the 15m-wide promenade area, it is geotechnically not feasible to extend the basement towards the seawall side.

9.3 Technical Constraints of the Aboveground Parking

- 9.3.1 The area surrendered for the ODP required by the government (39.586 m²) and the 15mwide voluntary waterfront promenade (608 m²), which together account for over a quarter of the total site area (2,419 m²), significantly restrict the building volume and capacity for aboveground car parking provisions. Notwithstanding, the means of escape staircases and the lift lobby are essential provisions that need to be catered on the ground level of the site.
- 9.3.2 The Applicants have proposed a voluntary 15m-wide waterfront promenade within the Application Site. Retail shops and eating places with landscaping and outdoor furniture will be provided at the ground floor level to enhance vibrancy and create a welcoming environment along Tung Yuen Street and the waterfront promenade for public enjoyment. Respecting the planning intention of the "R(E)" zone, the Proposed Scheme will achieve a non-domestic plot ratio of 0.9, incorporating 'Shop and Services' and 'Eating Place' uses at the ground and L1/F to provide the needed retail services not only to future residents but also general public. These retail uses at the ground and L1/F will enhance street vibrancy of the area at the pedestrian level, but also foster active shop frontages along Tung Yuen Street and the waterfront promenade which are significantly lacking in the area.
- 9.3.3 Further to the consultation with KTF on 14 Mar 2025, it is noted that the KTF appreciates the Applicants' genuine intention to provide a voluntary waterfront promenade that open for public enjoyment on a 24/7 basis, and to take up management and maintenance responsibilities. Additionally, the provision of retail activities at lower floors is also supported, as it would increase harbourfront vitality.
- 9.3.4 In considering the feasibility of additional car park aboveground, while maintaining the maximum building height of +100mPD, L1 has to be served by a car ramp to access the parking. Since the total site area is relatively small, should an additional car ramp to L1 carpark is present, considerable footprint of the site area will be taken up, and a continuous public passageway supported by nominal retail from Tung Yuen Street to the waterfront promenade would become infeasible. This is demonstrated by the revised layout of GF and L1 shown as below (Figure 9.3), where the public passage could no longer be provided, and the area of retail is greatly reduced.

9.3.5 Due to the uncertainty of the timeline for the construction of the waterfront promenade east to the site, the public planning gain of allowing the public to access and enjoy the waterfront promenade will be greatly compromised.



Figure 9.3 Revised Layout Plan of GF (left) and L1 (right)

9.3.6 In this revised scheme, L1 has been taken up for an additional car park instead of retail, as shown in the section (Figure 9.4). In order to maintain the non-domestic (retail GFA) as required in the "R(E)" zone on the OZP, an additional floor above G/F would be needed to accommodate the required non-domestic GFA. In this case, a further relaxation of building height for the Proposed Development would be required, which will exceed the BH restriction across Tung Yuen Street (100mPD), which will pose adverse visual impact and jeopardise the overall building height profile concept with descending building height profile towards the harbourfront in YTIA.



Figure 9.4 Revised Section

10 SUMMARY AND CONCLUSION

10.1 Summary

- 10.1.1 The parking provision of private residential uses is generally determined with reference to Hong Kong Planning Standards and Guidelines (HKPSG), in which the "Global Parking Standard" (GPS) has a range of <u>1 space per 4 to 7 units</u>.
- 10.1.2 To substantiate by taking account the site-specific conditions and district characteristics, the consideration factors for resident parking provision at the Proposed Development have been evaluated with justifications as summarised in Table 10.1 below:

	Table 10.1	Evaluation of Factors for Resident Parking Provision
fo	Consideration Factors r Resident Parking Provision	Justification for Proposed Development
(A)	Availability of public transport services in the vicinity	 Franchised bus and GMB stops are close to the project site 8-minute walk to Yau Tong MTR station 2 PTIs within approximately 500m from the project site
(B)	Availability of public car parks in the vicinity	• Existing publicly accessible car parking spaces with excess capacity available
(C)	Proximity to and quality of pedestrian access linking railway stations and other major public transport interchanges	 Within Walkable Range in 500m to the nearest rail station – Yau Tong Metro Station A clear pedestrian route to PT stations
(D)	Traffic conditions of local road networks	 Overloading junctions to be mitigated with committed improvements by others, despite the negligible traffic contribution by the development
(E)	Parking demand and supply condition in the vicinity	 Existing publicly accessible car parking spaces with excess capacity available No illegal parking was observed around the project site during site visit on weekday

ble 10.1	Evaluation of Factors for Resident Parking Provision

10.2 Conclusion

- 10.2.1 In view of the evaluation and justification for the consideration factors and site constraints, the findings are considered favourable for adopting low-end parking provisions for the subject site. Therefore, it is proposed that the provision level of resident parking facilities for the Proposed Development may adopt a low end GPS value of **1 space** per 7 units with 50 nos. of resident parking (plus 5 nos. of resident parking for visitors).
- 10.2.2 The commercial area of the site is about 2177.1 sqm, primarily comprising small retail shops for local residents. Therefore, the low end of the parking provision (1 car space per 300 sqm retail GFA) is adopted for retail, which is 8 nos. of retail parking.
- 10.2.3 Based on loading/unloading demands for the small retail shops of this development, it can be concluded that the goods delivery demand for a small-scale commercial area will follow economies-of-scale, therefore, the lower loading/unloading demand is proposed be adopted (1 loading/ unloading bay for goods vehicles for every 1 200 sqm GFA).