S16 PLANNING APPLICATION
APPROVED CHA KWO LING, YAU TONG, LEI YUE MUN OUTLINE ZONING PLAN NO. S/K15/29

Proposed Minor Relaxation of Building Height Restriction for Public Housing Development at Ex-Cha Kwo Ling Kaolin Mine, Kwun Tong

Supporting Planning Statement

November 2026

香港房屋委員會
Hong Kong Housing Authority

Executive Summary

This Planning Application is submitted by the Hong Kong Housing Authority ("HKHA") to seek approval from the Town Planning Board ("TPB") under Section 16 ("s.16") of the Town Planning Ordinance for minor relaxation of building height restriction ("BHR") by 5m, from 135mPD to 140mPD (+3.7%) for northern part and from 140mPD to 145mPD (+3.6%) for southern part of the permitted public housing development at Ex-Cha Kwo Ling Kaolin Mine ("ex-CKLKM") ("The Site"), Kwun Tong. The aim is to enhance the overall layout and urban design of the proposed public housing development for higher compatibility with the surrounding context and to optimise the development potential by providing about 2,114 flats.

The Site is zoned "Residential (Group A)9" ("R(A)9") on the approved Cha Kwo Ling, Yau Tong, Lei Yue Mun Outline Zoning Plan No. S/K15/29 ("the OZP"). According to the Notes of the OZP, 'Flat', 'Social Welfare Facility' and 'School' (on the lowest three floors of a building) uses are always permitted and no planning permission from the TPB is required. However, the Site is subject to maximum Plot Ratios (PRs) of 7.5 for a domestic building or 9.0 for a building that is partly domestic and partly non-domestic, as well as stepped BHRs of 135mPD in the south and 140mPD in the north.

The proposed minor relaxation of BHR (the Proposal) is fully justified with the following main reasons:

- The Proposal under this s.16 application has considered TPB members' suggestions on urban design during the rezoning stage in 2021/22. Site-specific building layout and disposition have been adopted for higher compatibility with the surrounding context. In particular, increasing the number of domestic blocks from three to four as compared to the Notional Scheme for rezoning can reduce the building bulk and enhance cross air ventilation and visual permeability.
- Optimisation of public housing production, such as increasing the average flat size for improving residents' living environment. It is in line with the Government's recommendation on home space enhancement as outlined in the "Hong Kong 2030+: Towards a Planning Vision and Strategy Transcending 2030" promulgated in 2021 and HKHA's plan to increase the internal floor area of units by approximately 10%, where feasible, for public housing projects to be completed in 2031-32 and onwards.

- Transfer plates are added to the domestic blocks to achieve a higher efficiency in design of facilities at podium and reduced podium bulk.
- The proposed building height under this Proposal has been optimised with consideration of various site constraints and saving of construction time and cost.
- The Proposal with minor relaxation of BHR will be visually compatible with the stepped building height profile of the surrounding area.
- The enhancement of overall design has incorporated the concepts of Housing Bureau's newly promulgated Well • being Design Guide.
- The proposed minor relaxation of BHR by 5m has duly considered the Harbourfront Planning Principles and relevant guidelines.
- The Proposal still meets the prevailing planning intention of "R(A)9" zone under the OZP.
- Technical assessments conclude that the proposed minor relaxation of BHR by 5m will not result in adverse impact to the surrounding area in air ventilation, visual and environmental terms.
- The proposed minor relaxation of BHR has been consulted with relevant stakeholders including both the Kwun Tong District Council and the Harbourfront Commission with no objection received.

In view of the above, the TPB is sincerely requested to give favourable consideration on the proposed minor relaxation of BHR of the Site.

行政摘要

(聲明：此中文譯本僅供參考，如中文譯本和英文原文有差異時，應以英文原文為準。)

是項規劃申請是由香港房屋委員會（下稱「房委會」）向城市規劃委員會（下稱「城規會」）提出，旨在根據《城市規劃條例》第16條，向城規會申請規劃許可，將前茶果嶺高嶺土礦場准許的公營房屋發展計劃（下稱「本地盤」）的建築物高度限制略為放寬五米，即北面部分由主水平基準以上135米放寬至主水平基準以上140米（增幅百分之三點七），而南面部分則由主水平基準以上140米放寬至主水平基準以上145米（增幅百分之三點六）。此舉旨在優化擬議公營房屋發展的整體佈局及城市設計，提升與周邊環境的兼容性，並善用地盤發展潛力，以提供約2,114個單位。

本地盤於《茶果嶺、油塘、鯉魚門分區計劃大綱核准圖編號S/K15/29》（下稱「大綱核准圖」）上劃為「住宅（甲類）9」地帶。根據大綱核准圖的註釋，「分層住宅」、「社會福利設施」及「學校」（在建築物的最低三層）屬經常准許用途，且毋須取得城規會的規劃許可。然而，該地帶發展受限於最高地積比率為7.5倍(整幢為住用建築物)或9倍(一幢建築物內住用與非住用各佔部分)，以及梯級式建築物高度限制，在本地盤的南面和北面分別為主水平基準以上135米和140米。

擬議略為放寬建築物高度限制（下稱「本方案」）的主要理據如下：

- 是項規劃申請所述方案已考慮城規會委員於 2021/22 年改劃階段時就城市設計所提出的改善建議。項目採用因地制宜的建築佈局及排列，有助提升與周邊環境的兼容性。與改劃階段的「概念方案」相比，住宅大廈的數目由三幢增加至四幢，以減低樓宇體積，並增強空氣流通及視覺通透度。
- 優化公營房屋供應，例如增加平均單位面積，以提升居民的居住環境。此舉配合政府於 2021 年公布的《香港 2030+：跨越 2030 年的規劃遠景與策略》中提及的「改善居住空間」建議，以及房委會計劃在 2031-32 年度起落成的公營房屋項目，在可行的情況下落實增加單位室內樓面面積約百分之十的安排。
- 住宅大廈亦增設結構轉換層，以設計更高效率的基座平台設施，並縮減基座平台的體積。
- 在充分考慮各項地盤限制，及節省建造時間與成本的前提下，本方案的擬議建築物高度已作優化。
- 本方案所擬議的略為放寬建築物高度限制，在視覺上與鄰近地區的梯級式建築物高度輪廓相容。
- 整體設計已作改良，以加入房屋局最新頒布的《幸福設計指引》內的概念。
- 擬將建築物高度限制略為放寬五米，已充分考慮海濱規劃原則及相關指引。
- 本方案仍符合「大綱核准圖」上「住宅（甲類）9」地帶的規劃意向。
- 技術評估結果顯示，建築物高度限制略為放寬五米的建議，在空氣流通、視覺及環境等方面均不會對周邊地區帶來不良影響。
- 已就略為放寬建築物高度限制的建議，諮詢相關持份者，包括觀塘區議會及海濱事務委員會，並無收到反對意見。

基於以上各點，懇請城規會批准略為放寬本地盤的建築物高度限制。

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1 INTRODUCTION

1.1 This Application seeks the Town Planning Board ("TPB")'s permission under Section 16 ("s.16") of the Town Planning Ordinance for proposed minor relaxation of building height restriction ("BHR") by 5m, from 135mPD to 140mPD (+3.7%) for southern part and from 140mPD to 145mPD (+3.6%) for northern part (i.e. increase by +4.6% to +4.9% measured in terms of absolute building heights from the site formation level of 32mPD), for the permitted public housing development at Ex-Cha Kwo Ling Kaolin Mine ("ex-CKLKM") ("The Site"), Kwun Tong.

2 SITE CONTEXT

2.1 Planning Context

2.1.1 To maximise the development potential of the Site with a gross site area of about 1.45 hectares ("ha"), the Civil Engineering and Development Department (CEDD) commenced a Design Review[1] in 2018 to examine the feasibility of relaxing the development intensity of the Site from medium to high-density development, from domestic plot ratio (PR) of 3.3 - 5.0 to 7.5. In addition, the cumulative impacts of the proposed public housing development at the Site and the adjoining Cha Kwo Ling Village (CKLV) were assessed in a separate Feasibility Study[2] commenced by CEDD in 2019. The findings of the above studies confirmed that there is no insurmountable technical problem for the high-density public housing development at the Site. The Site was subsequently rezoned from three "Residential (Group B)" ("R(B)") subzones (namely "R(B)2", "R(B)3" and "R(B)4") and "Open Space" to "Residential (Group A)9" ("R(A)9"). The concerned approved Cha Kwo Ling, Yau Tong, Lei Yue Mun Outline Zoning Plan (OZP) No. S/K15/27[3] was gazetted on 18 November 2022.

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[1] Under "Agreement No. CE 3/2014 (CE) Development of ex-CKLKMS – Design and Construction", technical aspects including sewerage, water supply, air quality, noise, water quality, tree preservation proposal, geotechnical, drainage and utilities were reviewed/assessed.

[2] Under "Agreement No. CE 60/2018 (CE) Site Formation and Infrastructural Works for Proposed Public Housing Developments at Kowloon East – Feasibility Study", the potential cumulative traffic/transport, visual and air ventilation impacts of the ex-CKLKMS Phase 2 development (including ex-CKLKM Site in the south and a school site in the north) and the CKLV development were assessed in one go.

[3] According to the Metro Planning Committee (MPC) paper no. 8/21 for rezoning, ex-CKLKM were assumed to provide about 2,250 flats with population of about 6,400 persons, an average flat size of about 45 m^2 and an average household size of about 2.8 persons per flat.

2.1.2 The Site falls within an area zoned "R(A)9" on the approved Cha Kwo Ling, Yau Tong, Lei Yue Mun OZP No. S/K15/29 ("the OZP") (**Plan 1** refers). According to the Notes of the OZP, 'Flat', 'Social Welfare Facility' and 'School' (on the lowest three floors of a building) uses are always permitted and no planning permission from the TPB is required. Furthermore, development at the Site is subject to a maximum PR of 7.5 for a domestic building or 9.0 for a building that is partly domestic and partly non-domestic, and a stepped BHR of 135mPD in the south and 140mPD in the north. Based on the individual merits of the development proposal, minor relaxation of the BHR may be considered by the TPB on application under s.16 of the Town Planning Ordinance.

2.2 Surrounding Land Uses

Referring to **Plan 1**, the Site falls within a high-density residential cluster. It is situated to the southwest of Sai Tso Wan Recreation Ground as well as high-rise residential development of Ping Tin Estate (with existing building height up to about 200mPD) and Sceneway Garden (with existing building height up to about 153mPD); to the east of the former Cha Kwo Ling Village (CKLV); to the south of existing private housing developments including Laguna City (with existing building height up to about 92mPD) and KOKO HILLS (with existing building height up to about 110mPD); and to the northwest of the Eastern Harbour Crossing. The adjacent CKLV site abutting the waterfront is designated for high-density public housing development to be developed by the Hong Kong Housing Society (with maximum OZP building height restriction of 110mPD and 130mPD), as well as a joint-user government complex for Government, Institution or Community (GIC) facilities and a sub-divisional fire station cum ambulance depot.

2.3 Accessibility

2.3.1 The vehicular access is proposed at +32mPD of Ko Ling Road, which will be completed by CEDD by end of 2027 tentatively. There is a new road under construction by CEDD to link Ko Ling Road and Cha Kwo Ling Road for convenient access to the waterfront area.

2.3.2 The main pedestrian entrances for both residents and users of the social welfare facilities and kindergarten are proposed at +37mPD of Ko Ling Road. A secondary

pedestrian entrance for residents is also provided at +32mPD of Ko Ling Road to provide a convenient access to and from the nearby proposed bus and mini-bus stops.

2.3.3 A public transport interchange is planned at the joint-user government complex by the government adjacent to CKLV Project, which can provide public transport services to serve the residents of the nearby developments, including the Site. A new pedestrian link connecting the joint-user government complex with the abovementioned new access road between Ko Ling Road and Cha Kwo Ling Road, as proposed by other Government Departments, would enhance the connectivity between the Site, CKLV development and Lam Tin Mass Transit Railway ("MTR") Station. The Site is located about 650m to the Lam Tin MTR Station and within an easy walking distance of about 10 minutes.

2.4 Design Considerations

2.4.1 The layout is sensibly designed by taking into account the site constraints, as listed below and demonstrated in **Plan 2**:

- The Site is located at hilltop with a relatively high platform at +32mPD, while BHRs of +135mPD and +140mPD have been imposed to the Site;
- a 5m setback from Ko Ling Road for domestic blocks and air-sensitive users to comply with air quality standards under the HKPSG;
- the new access road adjacent to the Site descends from the existing Ko Ling Road at +37mPD to the southwestern end at +32mPD, instead of a flat road, which pose constraints on the design of podium level;
- the Site has to adopt building separation, building setback and site coverage of greenery in order to comply with the Practice Note for Authorized Persons, Registered Structural Engineers and Registered Geotechnical Engineers (PNAP) APP-152 for Sustainable Building Design Guidelines (SBDG) for Gross Floor Area (GFA) concession;
- the Site partially falls within the harbourfront area that due regard shall be given to the Vision Statement for Victoria Harbour, the requirements under the Protection of the Harbour Ordinance (Cap. 531) and the Harbour Planning Principles of the Harbourfront Commission;

- the Site is partially within 250m from the Sai Tso Wan landfill consultation zone.

3 DEVELOPMENT PROPOSAL

3.1 The Proposed Development Parameters and Conceptual Design Merits

3.1.1 While the domestic PR of about 7.5 and total PR of about 8.22 at the Site fulfill the OZP requirements, the proposed increase of BHR by 5m (i.e. to not more than 140mPD at the southern part and 145mPD at the northern part) is required in accommodating four site-specific domestic blocks of 30 to 34 domestic storeys atop a podium of 3 to 4 storeys, to accommodate social welfare facilities, a six-classroom kindergarten, ancillary parking facilities, and recreational facilities. In total, about 2,114 flats will be produced for a design population of about 5,497 persons. Not less than 5,497 m^2 of local open space in accordance with the Hong Kong Planning Standards and Guidelines ("HKPSG") requirement of 1 m^2 per person will be provided within the Site (**Appendix 3**).

3.1.2 In terms of landscape, there is no existing tree within the Site when handed over to HKHA. The indicative landscape design (**Appendix 2**) under this s.16 Application aims to maximise greening and recreational opportunity as far as practicable to cater for the enjoyment of the residents. The landscaped areas are proposed at podium with multiple levels, which will provide both active and passive recreational facilities including communal play and fitness areas as well as viewing deck, to create a sustainable lifestyle with sense of well-being and a vibrant environment for enjoyment of residents. A minimum of 20% site coverage of greenery will be maintained, and at least half of the greenery will be provided at-grade or easily accessible to pedestrians (**Appendix 4**).

3.1.3 Detailed enhancement review of the Notional Scheme under rezoning has also been conducted. The comparison of conceptual layout for Notional Scheme under rezoning and Refined Scheme under this s.16 Application is shown on **Plan 3**. Subject to detailed design, the major changes include:

- Increased the number of building block from three to four with site-specific block design for reducing the building mass and creating building separations, in order to enhance both cross air ventilation and visual permeability and the compatibility with the surrounding areas;
- adjusted building disposition to create an agglomerated local open space for improving spatial quality and enhancing vibrancy in harbourfront area;
- incorporated transfer plate (about 3m in height and subject to detailed design) at each domestic block enabling higher efficiency in design of facilities at podium, enhancing air penetration at landscape area and reducing podium bulk;
- increased the BHR by 5m to maintain stepped building height effect descending from Ping Tin Estate (max. 200mPD) to the waterfront CKLV development site (max. 110mPD and 130mPD), which is visually compatible with the development in the locality;
- increased the average flat size from about 45 m^2 assumed in the rezoning stage to about 51 m^2 (calculated based on the current domestic GFA and flat no. and subject to detailed design), which is in line with the Government's recommendation on home space enhancement as outlined in the "Hong Kong 2030+: Towards a Planning Vision and Strategy Transcending 2030" promulgated in 2021 and HKHA's plan to increase the internal floor area of units by approximately 10%, where feasible, for public housing projects to be completed in 2031-32 and onwards.

3.1.4 The key development parameters of the Refined Scheme are set out in **Table 1** below, which is in line with the Planning Brief endorsed by the relevant Government Departments in July 2026. A set of schematic drawings illustrating the conceptual layout and design is provided at **Appendix 1**.

Table 1 Key Development Parameters of ex-Cha Kwo Ling Kaolin Mine

Development Parameters	**Refined Scheme (Proposed)**
Site Area[1] Gross/Net	About 1.45ha
PR - **Total**[2] - **Domestic** - **Non-Domestic**[3]	About 8.22 About 7.5 About 0.72

GFA - **Total** - **Domestic** - **Non-Domestic**[3]	 About 119,250 m^2 About 108,750 m^2 About 10,500 m^2
Maximum Building Height (at Main Roof Level)	Not more than 140mPD (southern part) and 145mPD (northern part)
No. of Building Block	4
No of Storey	About 34-37 (including about 3-4 storeys of podium)
Flat Production[4]	About 2,114
Design population[5]	About 5,497
Site Coverage - **Domestic** - **Non-Domestic** Building height >15m Building height <=15m	 Not more than 33.3% Not more than 60% Maximum 100%
Green Coverage (% of Gross Site Area)	Not less than 20%
Education Facilities	
Kindergarten (no.)[6]	1 (6 classrooms)
Recreational Facilities	
Local Open Space	Not less than 5,497 m^2
Children's Play Area	Not less than 440 m^2
Social Welfare Facilities[7]	
- Residential Care Home for the Elderly - Integrated Vocational Rehabilitation Services Centre - Hostel for Moderately Mentally Handicapped Persons	About 5,580 m^2 GFA (Subject to change as per SWD's request at detailed design stage)
Parking Facilities[8]	
Car Parking Spaces (Domestic)[9]	200
Car Parking Spaces (Visitors)[9]	20

Motorcycle Parking Spaces	20
Light Goods Vehicle and Light Bus Parking (Domestic)[10]	9
Loading/Unloading (L/UL) Bay (Domestic)[11]	8
Car Parking Spaces (Welfare Facilities) [12]	2
L/UL Bay (Welfare Facilities) [12]	1
Lay-by (Kindergarten) [13]	1

Note:

1. Subject to detailed survey and layout finalisation.
2. The submitted Air Ventilation Assessment-Expert Evaluation and Visual Appraisal are conducted based on the Refined Scheme with a total PR of about 8.22.
3. Non-domestic uses include a six-classroom kindergarten (about 765 m^2 GFA) and facilities ancillary to the development (e.g. circulation area), subject to detailed design. Based on the endorsed Planning Brief, no retail facilities have been proposed at this development, in view that there is ample existing provision in the local built-up area. Nevertheless, the provision of retail facilities is to be determined by HKHA, subject to review and detailed design.
4. Average flat size of 51 m^2 is assumed, subject to detailed design.
5. Based on average household size of 2.6.
6. As requested by Education Bureau (EDB) and subject to requirements of EDB.
7. Based on a total Net Operational Floor Area (NOFA) of about 3,480 m^2, as requested by Social Welfare Department (SWD) and subject to confirmation of government funding by relevant bureau/department. Government, institution or community facilities as required by the Government are exempted from PR/GFA calculation under the OZP.
8. Full PR/GFA exemption for ancillary parking facilities related to the development under the OZP. Parking provision in accordance with the HKPSG and with TD's agreement.
9. Shared-use by van-type Light Goods Vehicles or Taxis is allowed.
10. Shared-use by LGV and light buses parking is allowed.
11. Shared-use by coaches/buses and Medium/Heavy Goods Vehicle (M/HGV) L/UL bays for service vehicles and overnight parking, with due consideration of the site constraint and local situation.
12. Parking facilities for social welfare facilities are subject to requirements of SWD.
13. Subject to the requirements of HKHA according to the HKPSG.

3.2 Implementation Programme

3.2.1 Tentatively, piling works of the Site would be commenced in 2027/28 for planned building completion in 2031/32.

4 PLANNING JUSTIFICATIONS AND MERITS

4.1 Improvement of Urban Design for Higher Compatibility with the Surrounding

4.1.1 During the rezoning stage in 2021/22, TPB members suggested that the project proponent to focus on the quality of urban design to create an ambience for the area

and to include permeable elements at podium level. In view of this, the Refined Scheme has adopted four site-specific blocks with reduced building bulk of each block as compared to the three blocks in rigid building form adopted in the Notional Scheme for rezoning (**Plan 3**). The proposed slightly taller and smaller building footprint allows creation of building separation not only in NE-SW direction, but also in NW-SE direction, enhancing cross air ventilation and visual permeability along two axles and avoiding potential "wall-effect" under the Notional Scheme. The perception of building bulk at street level would be minimised in the Refined Scheme. It is more responsive to the surrounding context and adjoining developments which enhances the overall urban design.

4.2 **Addition of Transfer Plate to Enhance Podium Design**

4.2.1 A transfer plate of about 3m (subject to detailed design) has also been added to each domestic block which can avoid sub-dividing the covered podium garden by densely spaced upper-level walls for higher efficiency in design of facilities at podium and also reduced podium bulk. Open space will then be agglomerated (**Plan 3**) to foster a comfortable living environment for social interactions and physical activities for future residents. The visual connectivity and air permeability at both the podium and pedestrian levels will also be improved, which echoes with TPB members' suggestion at rezoning stage.

4.3 **Optimised Building Height with Consideration of Site Constraints and Construction Time and Cost**

4.3.1 Efforts have been made to reduce the building height of the proposed development against the site constraints as listed in Section 2.4 above. The floor-to-floor heights of domestic portion (about 2.75m), which is typical for adoption in public housing developments, and parking facilities (about 5m) have been optimised based on the prevailing standards. The control of site coverage and building setback in the SBDG limits the possibility of providing more flat units or more non-domestic accommodations at low zones.

4.3.2 Consider the Site is adjoining Ko Ling Road rising from +32mPD in the south towards +37mPD in the north, locating the ancillary carpark (about 5m in height) aboveground instead of underground can better utilize the aboveground space in

between the two road levels. The podium garden proposed at +37mPD on top of the carpark and plant rooms can allow residents' seamless access to and from the landscaped areas, the domestic lift lobbies and the proposed primary entrance at +37mPD of Ko Ling Road (**Ground Floor Plan** of **Appendix 1** refers). Besides, omitting the need for additional excavation of basement floor can avoid extra substantial cost to be incurred and significant implication on the construction programme, which complements with other means by HKHA to expedite the supply of public housing units, such as partial adoption of Modular Integrated Construction (MiC) for the proposed development [4].

4.4 **Compatible with the Stepped Building Height Profile in the Locality**

4.4.1 The proposed building height of maximum 145mPD for taller building blocks at the upper hillside and maximum 140mPD for lower building blocks towards the waterfront is visually compatible with the developments in the locality, i.e. descending from Ping Tin Estate (max. 200mPD) to the CKLV development (max. 130mPD) abutting the waterfront, and would not induce significant adverse effects to the visual character of the surroundings. As demonstrated in the photomontage of Viewing Point 8 in **Appendix 6**, the view of the background ridgeline from the East Coast Boardwalk and the stepped building height profile of the surrounding area remains preserved under the Refined Scheme.

4.5 **Incorporation of the Concepts of Housing Bureau's Newly Promulgated Well • being Design Guide**

4.5.1 In September 2024, the Housing Bureau and the HKHA announced the launch of "Well • being Design Guide", covering eight well-being concepts and serves as a reference for the future design of new public housing estates. In response, various design adjustments (e.g. site-specific block layout and inclusion of transfer plates as mentioned in Sections 4.1 and 4.2) have been made for enhancing the spatial quality of the podium space at different levels.

[4] The proposed partial adoption of MiC (subject to detailed design) at this development is not entitled to the concession on minor relaxation of BHR under the Joint Practice Note No.8 and would not lead to the proposed 5m increase in building height.

4.5.2 Adoption of site-specific block layout instead of rigid building form has allowed the concentration of local open space in the centre of the development, creating a focal point (such as multi-function plaza and lawn with seatings) for residents to stimulate social interactions and physical activities, and in turn achieve the well-being concepts of "health & vitality" and "intergenerational & inclusive living". Meanwhile, the introduction of transfer plate has avoided extensive blocking of walls or building structures at the covered landscaped areas underneath the building blocks, creating all-weather spaces for flexible use, communal play and fitness areas of different ages, as well as direct views towards the harbourfront area, which can achieve the well-being concepts of "family & community connection" and "urban integration". The permeable podium design with provision of various greening types (**Appendix 4**) creates a comfortable environment for residents to enjoy the well-being concept of "green living & sustainability".

4.6 **In line with the Harbourfront Planning Principles and Relevant Guidelines**

4.6.1 The site is located inland without direct harbourfront frontage. As detailed in the consultation paper endorsed by the Task Force on Harbourfront Developments in Kowloon, Tsuen Wan and Kwai Tsing in September 2026, the proposed 5m BHR relaxation would have a minimal impact on harbourfront accessibility and overall visual quality.

4.6.2 The Refined Scheme preserves key harbour vistas, including the view of the background ridgeline from the East Coast Boardwalk (i.e. Viewing Point 8 in **Appendix 6**), while respecting the stepped height profile from inland to the shore. In addition, visual permeability towards the harbourfront is strengthened through reduced building bulk, the provision of viewing deck at podium, and improved NW-SE and NE-SW building separations. Multi-level pedestrian entrances (at +32mPD and +37mPD) will also be provided to ensure convenient pedestrian access to nearby public transport facilities and easy access to waterfront.

4.6.3 The agglomerated local open space and accessible podium garden within the Site, with an overall target of 20% greening ratio of gross site area to be maintained, will in turn improve the visual connectivity and air penetration towards the harbourfront

at both the podium and pedestrian levels. As a result, the vibrancy towards the harbourfront will be enhanced.

4.7 **In Line with the Prevailing Planning Intention of "R(A)9" zone under the OZP**

4.7.1 The proposed minor relaxation of BHR for the Site conforms with the prevailing planning intention of the OZP for "R(A)9" zone which is for high-density residential development. The proposed increase of maximum BH from 135mPD to 140mPD (+3.7%) and from 140mPD to 145mPD (+3.6%) are considered minor in nature, with extant permissible PR as stipulated under the OZP remains unchanged. Therefore, the Refined Scheme would continue to meet the prevailing planning intention of "R(A)9" zone. In case the s.16 planning application for minor relaxation of BHR is not approved, the building height will be confined to the current BHR with the flat number reduced to about 2,016 (i.e. a loss of about 98 flats).

4.8 **No Adverse Technical Implications**

4.8.1 The flat number and design population are within the limit (i.e. maximum 2,284 flats with a population of 6,394 persons) of the technical assessments in the Feasibility Study and Design Review Report for rezoning in 2021/22, including Traffic Impact Assessment (TIA), Noise Impact and Air Quality Impact Assessment, Sewerage Impact Assessment, Drainage Impact Assessment, Water Supply Impact Assessment, Geotechnical Assessment and Utilities Impact Assessment, etc. conducted by CEDD during the rezoning stage. The above studies concluded that no insurmountable impact arising from the proposed public housing development is anticipated. Hence, the proposed minor relaxation of BHR will not result in adverse infrastructural impacts on the surrounding areas. Further assessments on air ventilation, visual and environmental aspects have been conducted in support of this s.16 Application with no insurmountable adverse impact anticipated.

<u>No Adverse Impact on the Air Ventilation</u>

4.8.2 An Air Ventilation Assessment - Expert Evaluation (AVA-EE) (**Appendix 5** refers) has been prepared for the Refined Scheme. Building separations of about 15m based on the SBDG are proposed to achieve a satisfactory wind environment annually. There would be no adverse air ventilation impact to the surrounding environment.

No Adverse Visual Impact

4.8.3 A Visual Appraisal ("VA") (**Appendix 6** refers) has been conducted in accordance with the Town Planning Board Guidelines No. 41A – Submission of Visual Impact Assessment. A total of eight Visual Sensitive Receivers ("VSR") are selected to evaluate the visual compatibility and degree of anticipated visual impacts of the Refined Scheme compared against the baseline, which is the Notional Scheme for rezoning.

4.8.4 Based on the analysis, the visual impact due to the minor relaxation of BHR will be "negligible" to "slight". The building bulk is reduced and visually compatible with the surrounding high-rise and medium-rise residential development. The proposed building separations in turn create visual corridor through the adjoining planned CKLV development to connect the waterfront. With adoption of sensitive design/mitigation measures, the proposed increase of BHR by 5m would not create significant adverse visual impact on the VSRs.

No Adverse Environmental Impact

4.8.5 A Design Review report has been conducted by CEDD to identify and assess the potential environmental impacts in respect of air quality, noise, water quality, waste management and landfill gas hazard to support the rezoning in 2021. The proposed minor relaxation of BHR would not cause insurmountable environmental problem.

4.8.6 An Environmental Assessment Studies ("EAS") has been conducted and submitted to Environmental Protection Department (EPD) for approval in September 2026, and no adverse comment was received on 3 November 2026. The assessment results concluded that the predicted road traffic and fixed noise levels at all representative noise sensitive receivers comply with the relevant noise criteria and no insurmountable problem is anticipated. With sufficient horizontal separation between the kerb of nearby roads and the domestic blocks, sufficient separation between the development platform and the portals and ventilation buildings of Tseung Kwan O – Lam Tin Tunnel and Central Kowloon Bypass (formerly named as Trunk Road T2), as well as sufficient buffer between the domestic blocks and the restored landfill, no adverse air quality impact from vehicular emission and odour is anticipated. With the implementation of gas protection measures to control the

passage of landfill gas into the Site, no adverse landfill gas hazard impact is anticipated.

No Other Adverse Technical Implications

4.8.7 The proposed increase of BHR would not result in insurmountable issues from other technical aspects (e.g. traffic, sewerage, drainage, fresh and salt water supply, geotechnical etc.) and would not affect the results of the relevant technical assessments under CEDD's Design Review Report for the ex-CKLKM to support the rezoning in 2021, as confirmed by CEDD.

4.9 Support from Public Consultation

4.9.1 On 18 July 2023, the Housing Department consulted the Kwun Tong District Council (Housing, Planning, Lands, Development and Redevelopment Committee) on the proposed public housing development. Members had no objection to the public housing development at the Site with higher building heights [5] .

4.9.2 On 16 September 2026, a consultation paper regarding the proposed minor relaxation of BHR by 5m was circulated to the Task Force on Harbourfront Developments in Kowloon, Tsuen Wan and Kwai Tsing and subsequently no objection was received from the members.

5 CONCLUSION

5.1.1 It has been demonstrated in this Supporting Planning Statement that the proposed minor relaxation of BHR by 5m, from 135mPD and 140mPD to 140mPD and 145mPD respectively, for public housing development at ex-CKLKM has enhanced the building design, layout and disposition in response to the site constraints and has optimised the development potential of the Site to provide public housing units with larger average flat size and accommodate various ancillary and community facilities.

[5] The Proposal presented to the District Council has suggested higher building heights of not more than 146mPD and 154mPD (subject to TPB's approval). Flexibility has been allowed in the DC paper with a rider that the development parameters in the proposed scheme are preliminary in nature for reference only and subject to detailed planning and design.

5.1.2 The Refined Scheme is compatible with surrounding development context with reference to Harbourfront Planning Principles, strengthens the stepped building height profile, and in line with the planning intention of the "R(A)9" zone. As demonstrated in the technical assessments, the proposed minor relaxation of BHR will have no insurmountable technical impacts, in particular on the air ventilation, visual and environmental aspects.

5.1.3 In view of the above, the TPB is sincerely requested to give favorable consideration on this application for the proposed minor relaxation of BHR at the Site.