

PROPOSED MINOR RELAXATION OF BUILDING HEIGHT RESTRICTION TO ALLOW FOR ONE STOREY OF BASEMENT FOR CARPARKING AND ANCILLARY PLANT ROOM FOR THE PERMITTED HOUSE DEVELOPMENT AT NEW KOWLOON INLAND LOT NO. 754, 4 CUMBERLAND ROAD, KOWLOON TONG, KOWLOON

Town Planning Application No. A/K18/351

Attachment 1: Response-to-Comment Table (Departmental Comments)

<i>Departmental Comments</i>	<i>Response</i>
Planning Department received on 17.6.2026 by email	
1. It is noted that the proposed basement is not more than 76% of the site area, please provide the basement size. Please justify and demonstrate the scale of proposed basement is not excessive.	The basement size is provided in Table 2 of Attachment 2 – Replacement Pages for Supplementary Planning Statement (SPS). With reference to the revised Section 5.3 in Attachment 2, the proposed basement is sized exclusively to accommodate car parking provisions as agreed by the Transport Department and essential ancillary plant rooms, with no portion devoted to any extraneous use. The revised basement-to-site area ratio of about 75.6% falls squarely within the established precedent range of 41% to 76% as set out in Table 1 the SPS. The relatively high ratio is a direct consequence of the constrained site area, noting that the Application Site is only 48% to 66% of the site areas of the reference cases in Table 1 — such that standard car parking spaces, loading/unloading space, and modest ancillary plant room to be housed in the basement will represent a comparatively high proportion of the total site area. The proposed basement is therefore considered to be of an appropriate, justified and not excessive scale in the circumstances of this application.
2. Please justify the increase in site coverage of the proposed scheme compared with the OZP-compliance scheme while most of the aboveground plant rooms and ancillary facilities have been provided in the basement level.	The site coverage is revised. Please refer to Table 2 of the SPS.

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3. It is noted that the greenery ratio for the proposed development will be not less than 20%, situating at G/F and 1/F. Please provide detailed information about the proposed greenery. Please also provide a landscape proposal clearly demonstrate the landscape treatment for our assessment.	The greenery ratio is revised. Please refer to Table 2 of the SPS for the revised pages of the Supplementary Planning Statement, and a new Appendix 3 – Landscape Proposal in Attachment 2 (SPS) .
4. For G/F and 1/F floor plans, please annotate the green dotted area.	The floor plans are revised. Please refer to Appendix 1 – Proposed Scheme and Appendix 2 – OZP-compliant Scheme in Attachment 2 (SPS) .
5. For G/F, it is noted there are three trees, please clarify if they are existing trees or proposed new trees.	As per the latest revised floor plans of Appendix 1 and the new Appendix 3 of Attachment 2 , the proposed new trees constitute a part of the Landscape Proposal.
6. It is noted from the floor plan that there are building structure on 1/F encroached onto the 6m-wide NBA facing from Cumberland Road which will defeat the intention of providing NBA. Please rectify the plans to align with such intention. The setback of 1/F and 2/F from Cumberland Road should also be provided.	Please be clarified that that the building structure on 1/F does not encroach onto the NBA. The building has a setback of about 7.8 meters for 1/F and 2/F from Cumberland Road, please refer to the floor plans in Appendix 1 and Appendix 2 of SPS .
7. Please indicate the lift overrun on R/F plan and show all the ancillary facilities on the section plans for both proposed and OZP-compliant schemes. Please also provide the height of all the ancillary facilities including the stair hood and plant rooms, and the lift overrun.	Heights of all ancillary facilities on R/F are supplemented in Appendix 1 and Appendix 2 of SPS , subject to detailed design.
8. It is noted that the planning statement that the provision of basement facilities will not compromise meaningful at-grade greening by allowing sufficient soil depth proposed in PNAP APP-152. Please elaborate how the proposed basement will not affect the at-grade greening.	According to the new Landscape Proposal (Appendix 3), landscaping opportunities would be a mix of planters and at-grade planting, whereas sufficient soil depth will be provided. Please refer to the revised sections in Appendix 1 .
9. It is noted that the car parking provision for the proposed scheme and OZP compliant scheme are different. Please clarify for a fair comparison provided that the development intensity is the same for the proposed and OZP-compliant schemes.	It is clarified that both the Proposed Scheme and the OZP-compliant Scheme adopt the same development intensity, and the comparison is made on a like-for-like basis. The difference in car parking provision between the two schemes is not an inconsistency but rather a direct illustration of the planning justification for the basement. As the comparison demonstrates, an OZP-compliant scheme at the same development intensity would result in a reduced level of greening,

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	while spatial constraints at grade would further limit the ability to provide adequate car parking for Transport Department's agreement. The Proposed Scheme resolves both constraints without any increase in above-ground bulk by accommodating car parking and ancillary plant rooms below ground.
10. For the section of the OZP-compliant scheme, AHU room is missing in the section submitted in the SI, please update.	Section of the OZP-compliant Scheme is revised in Appendix 2 of SPS .
11. The footprint of the roof plan for the proposed development and the OZP-compliant scheme is different, please clarify and rectify.	Please refer to the revised roof plans in Appendix 1 and Appendix 2 of SPS .
Landscape Unit, Urban Design and Landscape Section, Planning Department received on 17.6.2026 by email	
1. We have reservation on the application from landscape planning perspective. Our detailed comments on the subject application are as follows:	Noted.
2. Based on aerial photo taken in 2024, the Site is located in area of urban landscape character characterised by low-rise residential houses and schools and religious institutions;	Noted with thanks.
3. With reference to DPO's site photos taken on 12.6.2026, the Site was formed with existing building. Some vegetation are found within the Site; and	Noted with thanks.
4. According to Explanatory Statement (ES) of Kowloon Tong OZP (S/K18/21), the construction of the basement should not cause any adverse impacts to the existing tree or deteriorate the distinctiveness of the area as a garden estate. The Excavation Plan submitted by the Applicant indicated that the extent of the excavation area would be close to the site boundary. The Applicant has not provided any supporting information to demonstrate that the proposed basement would not cause adverse impacts on the existing tree or deteriorate the distinctive garden estate.	Please note that there are no existing trees within the Subject Lot. A setback of approximately 1 m to 1.4 m from the site boundary will be reserved around the Subject Lot to facilitate excavation works and to avoid damage to existing trees outside the site. During the excavation works, contractors will be required to be supervised by qualified tree specialists and to adopt the necessary protective measures to prevent any damage to the existing trees.

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	The existing boundary wall enclosing the site, together with its substructure, helps to block most roots from extending into the site. With the above mitigation measures, it is anticipated that the proposed basement would not cause any adverse impact on the existing trees.
5. The applicant should be advised that approval of the application does not imply approval of tree works such as pruning, transplanting and felling. Application for any tree works should be submitted to relevant departments for approval.	Noted with thanks.
6. For compliance of site coverage of greenery requirements under PNAP APP-152, submission should be made to Buildings Department for comments and approval.	Noted with thanks.
Urban Design Unit, Urban Design and Landscape Section, Planning Department received on 17.6.2026 by email	
1. We have no adverse comments on the application from urban design and visual perspectives.	Noted with thanks.
2. The subject site with an area of about 478.48m ² , abutting Cumberland Road, forms part of a street block zoned "Residential (Group C)1" ("R(C)1") with development restriction of maximum plot ratio (PR) of 0.6 and a building height restriction (BHR) of 3 storeys. Since the proposed minor relaxation of BHR only involves an additional basement floor and a 6m-wide non-building area along the western site boundary is proposed in accordance with the Kowloon Tong Outline Development Plan No. D/K18/1A, it would unlikely cause any change to the perceivable massing/bulk of the proposed development above-ground. In view of the above, the proposed development with BH of 4 storeys (including 1 storey of basement) is considered not incompatible with the surrounding area and would unlikely induce significant adverse impact on the visual character of the townscape.	Noted with thanks.

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Architectural Services Department received on 17.6.2026 by email	
1. Based on the information provided, it is noted that the proposed development mainly consists of 1 building with a plot ratio (PR) of 0.6 and a building height (BH) of 4 storeys (including 1 storey of basement), which is a 33% increase in BH from the BH restriction as stipulated in the current Outline Zoning Plan (OZP). Since the design, disposition, and height of the above-ground building structure are largely the same with those of an OZP-complaint scheme, we have no comment from architectural and visual impact point of view, subject to PlanD's view.	Noted with thanks.
Geotechnical Engineering Office, Civil Engineering and Development Department received on 17.6.2026 by email	
1. The Geotechnical Engineering Office (GEO) has no adverse geotechnical comment on the captioned application.	Noted with thanks.
East Development Office, Civil Engineering and Development Department received on 17.6.2026 by email	
1. Please be advised that we have no comment on the captioned from project interface perspective.	Noted with thanks.
Electrical and Mechanical Services Department received on 17.6.2026 by email	
1. Please be advised that we have no comment from our regulatory services perspective.	Noted with thanks.
Fire Services Department received on 17.6.2026 by email	
1. Please be informed that I have no specific comment on the captioned proposal subject to water supplies for firefighting and fire service installations being provided to the satisfaction of the Director of Fire Services.	Noted with thanks.
2. Detailed fire services requirements will be formulated upon receipt of a formal submission of STT/STW, general building plans or	Noted with thanks.

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referral of application via relevant licensing authority. Furthermore, the EVA provision in the captioned work shall comply with the requirements as stipulated in Section 6, Part D of the Code of Practice for Fire Safety in Buildings 2011, which is administered by the Building Authority.	
Hong Kong Police Force received on 17.6.2026 by email	
1. Please note that we have no comment on the proposed application.	Noted with thanks.
Kowloon City District Office received on 17.6.2026 by email	
1. This office has no comment on the subject application providing that the applicant can fulfill the conditions set out by other departments.	Noted with thanks.
District Lands Office/Kowloon East, Lands Department received on 17.6.2026 by email	
1. The application site is located at New Kowloon Inland Lot No.754 ("the Lot") which is subject to a lease term having been extended up to 30 June 2047. Pursuant to the lease governing the Lot, the Lessee shall during the whole of the lease term keep and maintain in the Lot a messuage or dwelling house which is subject to the front and range clause and other conditions as contained in the lease. It is further specified in the lease that the Lessee shall not erect any other messuage or dwelling house on the Lot without prior consent in writing of the Direction of Public Works (now the Director of Lands).	Noted with thanks.
2. If the planning application is approved by the Town Planning Board, the owner of the Lot shall apply to Lands Department ("LandsD") for a consent under lease for the proposed redevelopment or a lease modification to implement the proposal. However, there is no guarantee that such application will be approved. Such application, if received, will be processed by LandsD in the capacity as a landlord and if the application is approved, it will subject to such terms and	Noted with thanks.

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conditions including, inter alia, payment of premium and administrative fee as may be imposed by LandsD.	
Water Supplies Department received on 17.6.2026 by email	
1. No comment on the application.	Noted with thanks.
Transport Department received on 17.6.2026 by email	
1. I have no adverse comment on the proposed 2 nos. of ancillary PC parking spaces, 1 no. of visitor PC parking space, and 1 no. of LGV loading/unloading bay for the proposed development comprising one single family house with GFA >220m ² , and	Noted with thanks.
2. The vehicular access should be provided within the specified X-Z-Y points according to the lease, I have no comment on the proposed clear width of 5m.	Noted with thanks. It should be noted that the prevailing lease has not indicated any specified X-Z-Y points.
3. Noting the car lift and turn table are proposed within the subject development; I have no adverse comment on the manoeuvring space for the carpark area provided that the car lift and turn table will be properly managed and operated.	Noted with thanks.
Drainage Services Department received on 24.6.2026 by email	
1. <u>Sewerage Impact Assessment (SIA)</u> Please note that EPD is the planning authority of sewerage infrastructure, submission of SIA or any sewerage review shall be circulated to SIG/EPD for their comments and approval. Subject to EPD, it may be required to assess and demonstrate the potential sewerage impact to the existing sewerage system, and formulate appropriate mitigation measures if any adverse sewerage impact is identified.	Noted with thanks.

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2. <u>Drainage Impact Assessment</u> Please advise: i. Paved/unpaved area ratio before and after the proposed development; ii. Any change in discharge point which leads to change in flow rate to existing public drainage system; iii. Any change in site formation level.	i. Please note that there is no change in the paved-to-unpaved area ratio before and after the proposed development; it remains at 1:1. ii. There is no change to the existing drainage point with the two drainage pipes running from west to east along the boundary wall and connected and discharging to the existing public drainage system. iii. There is no change for the site formation level.
3. Understanding that there would be basement in the proposed development, please advise whether any resilience measures would be implemented.	Before the excavation for the construction of the basement, sheet piling and lateral supports shall be installed. Tight monitoring for vibrations, tiltings and settlements shall be conducted during the basement excavation works to make sure the integrity and stability of the adjoining buildings/structures will not be affected. The drawings for excavation have to be submitted to BD & GEO for approval.
4. Please note that this is a coordinated reply from the Mainland South Division and the Land Drainage Division of DSD.	Noted with thanks.
Environmental Protection Department received on 24.06.2026 by email	
1. Based on the information provided, we have no adverse comment on the subject planning application from environmental planning perspective.	Noted with thanks.
2. Nevertheless, considering sewerage system is available in the vicinity, the applicant is reminded that the implementation of local sewer connection works shall meet the satisfaction of DSD.	Noted with thanks.
Building Department received on 30.06.2026 by email	
1. All building works are subject to compliance with the Building Ordinance (BO).	Noted with thanks.
2. Detailed comments under the BO on individual sites for private developments such as permissible plot ratio, site coverage, means of escape, emergency vehicular access, private streets, and/or access roads, open space, barrier free access and facilities,	Noted with thanks.

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compliance with the sustainable building design guidelines, etc. will be formulated at the building plan submission stage.	
3. Service lane should be provided in accordance with Building (Planning) Regulation (B(P)R) 28(1), if applicable. Such service lane should be excluded from site area for the purpose of plot ratio and site coverage calculations. B(P)R 23(2)(a) refers.	Noted with thanks.
4. GFA concessions for the proposed basement carpark would be considered subject to compliance with the relevant criteria under PNAP APP-2.	Noted with thanks.
Highways Department received on 30.06.2026 by email	
1. Please be advised that there is no comment on the application from the highway's maintenance point of view.	Noted with thanks.