

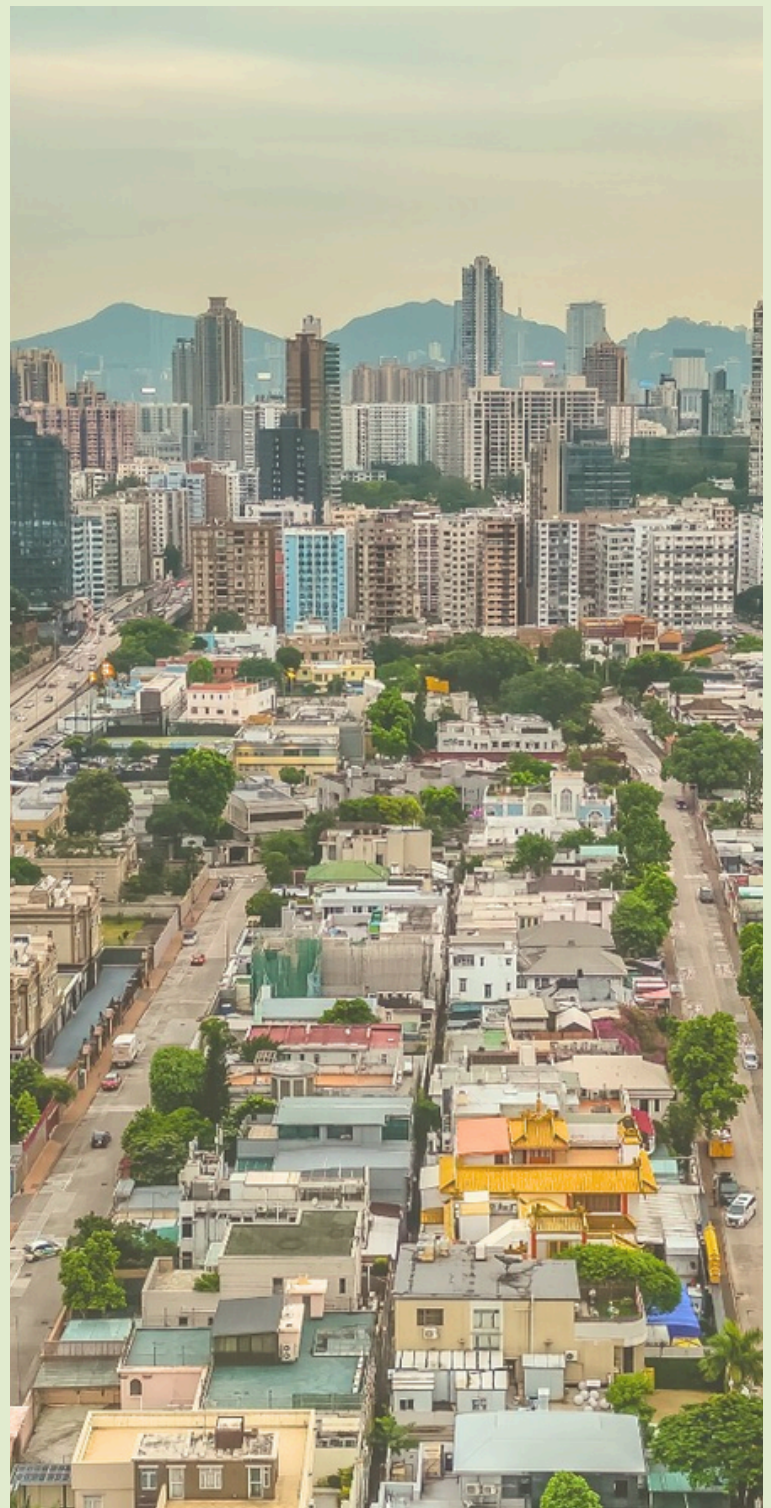
SECTION 16 TOWN PLANNING APPLICATION

SUPPLEMENTARY PLANNING STATEMENT

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

REVISED IN LATE JULY 2026



APPLICANTS

PLANNING AND LANDS CONSULTANT

ARCHITECT

AUTHORIZED PERSON AND STRUCTURAL ENGINEER

SHENG FANG & YANG JUAN



DeSPACE (INTERNATIONAL) LIMITED



LOCUS ASSOCIATES LIMITED



S.T. WONG AND PARTNERS LIMITED

4. THE PROPOSED REDEVELOPMENT

TABLE 2 – KEY DEVELOPMENT PARAMETERS

Development Parameters	OZP-compliant Scheme	Proposed Scheme	Compliance
Site Area	About 478.48 sq. m. (or 5,150.47 sq. ft.)		N/A
Gross Floor Area ("GFA")	About 287.0 sq. m.	About 287.0 sq. m. (1)	B(P)R complied
Plot Ratio ("PR")	About 0.60	About 0.60	OZP Complied
Building Height ("BH")	12m (25.55mPD at roof level)	12m (25.55mPD at roof level)	JPN5 complied
No. of Storeys	3 storeys	4 storeys (including 1 level of basement)	Minor relaxation to be sought
Site Coverage ("SC")	42% (about)	30% (About)	Within the range to cases in Table 1
Basement Area	N/A	362 sq.m. (about 75.6% of site area)	Within the range to cases in Table 1
Greening Ratio	About 10% (or 47.8 sq.m.)	Not less than 20% (or not less than 95.6 sq.m.)	Within the range to cases in Table 1
Car Parking	2 Private Car Parking Spaces (including 1 Accessible Visitor Car Parking Space)	<u>3 Private Car Parking Spaces (including 1 Accessible Visitor Car Parking Space)</u>	Within an acceptable range in relation to site area compared to cases in Table 1
Loading/ Unloading ("L/UL") Facilities	N/A	<u>1 Private Car, Van-type Light Goods Vehicle ("LGV") Space</u>	Within an acceptable range in relation to site area compared to cases in Table 1

(1) According to the Practice Note for Authorised Persons, Registered Structural Engineers and Registered Geotechnical Engineers (PNAP) No. APP-2, the GFA of the proposed basement private car park, ancillary plant rooms, and access staircases can be disregarded under the Buildings Ordinance.

4. THE PROPOSED REDEVELOPMENT

4.2.4 Enhanced Greening Ratio

The Proposed Redevelopment commits to achieve a greenery ratio of not less than 20%. This is made possible precisely because of the basement, which confines the building footprint to a compact area below grade and frees up the remaining at-grade areas and rooftop for generous soft landscaping. An OZP-compliant scheme without a basement would be less able to achieve a desirable level of greenery, as the building footprint at grade would occupy a proportionally greater share of the site area due to the necessary provision of plant rooms. The provision of a basement therefore directly enables a higher standard of greening that would otherwise be unattainable.

4.2.5 Relocation of Ancillary Facilities to Basement

The proposed basement accommodates all private car parking spaces and ancillary plant rooms below ground. By consolidating these facilities within the basement, the Proposed Redevelopment eliminates the visual clutter that would otherwise result from the placement of bulky plant and equipment at ground and roof level, as would be required under an OZP-compliant scheme. The outcome is a clean, unencumbered roofscape that enhances the local townscape when viewed from surrounding properties and elevated vantage points, and a building form that presents a more refined and carefully considered appearance in keeping with the residential character of the KTGE.

5. PLANNING CONSIDERATIONS

5.3 APPROPRIATE DEVELOPMENT SCALE

5.3.1 The proposed basement is of a proportionate and justified scale, sized exclusively to accommodate uses that are functionally necessary for the Proposed Redevelopment. With a basement footprint of about 75.6% of the site area, the extent of the basement is directly dictated by two categories of operational requirement: HKPSG-compliant car parking provision comprising 3 private spaces with 1 accessible visitor space, together with the circulation and manoeuvring areas that such provision requires; and essential building services plant including water tanks, mechanical and electrical facilities. No portion of the basement is devoted to any discretionary or extraneous use.

5.3.2 Given the constrained site area, basement provision is the only viable means of satisfying both the parking requirement and the need to consolidate building services without consuming at-grade land that would otherwise be available for landscaping. An OZP-compliant scheme without a basement would be less effective in accommodating parking at grade in line with HKPSG, would require bulky plant rooms to be distributed across the ground and roof levels, and would result in a reduced level of greening generally demonstrated in similar developments. By accommodating these functional elements below ground, the Proposed Redevelopment achieves a materially superior planning outcome in every measurable respect.

5.3.3 Since the basement floor area for car parking and ancillary plant rooms is disregarded under PNAP APP-2, both the plot ratio of 0.6 and site coverage of about 30% are strictly observed, with no increase in above-ground bulk resulting from the basement. Assessed against the approved precedents in Table 1, the proposed basement-to-site area ratio falls squarely within the established range of 41% to 76%, with the two most recently approved cases at 3 and 5 Lincoln Road both achieving 73% on sites considerably larger than the Application Site. The relatively high ratio in the present case is a direct consequence of the small site area rather than any attempt to maximise basement extent beyond what is functionally necessary. Therefore, in terms of site-specific context, the proposed basement is consistent with comparable approved cases and is considered to be of an appropriate, justified and not excessive scale in the circumstances of this application.

5. PLANNING CONSIDERATIONS

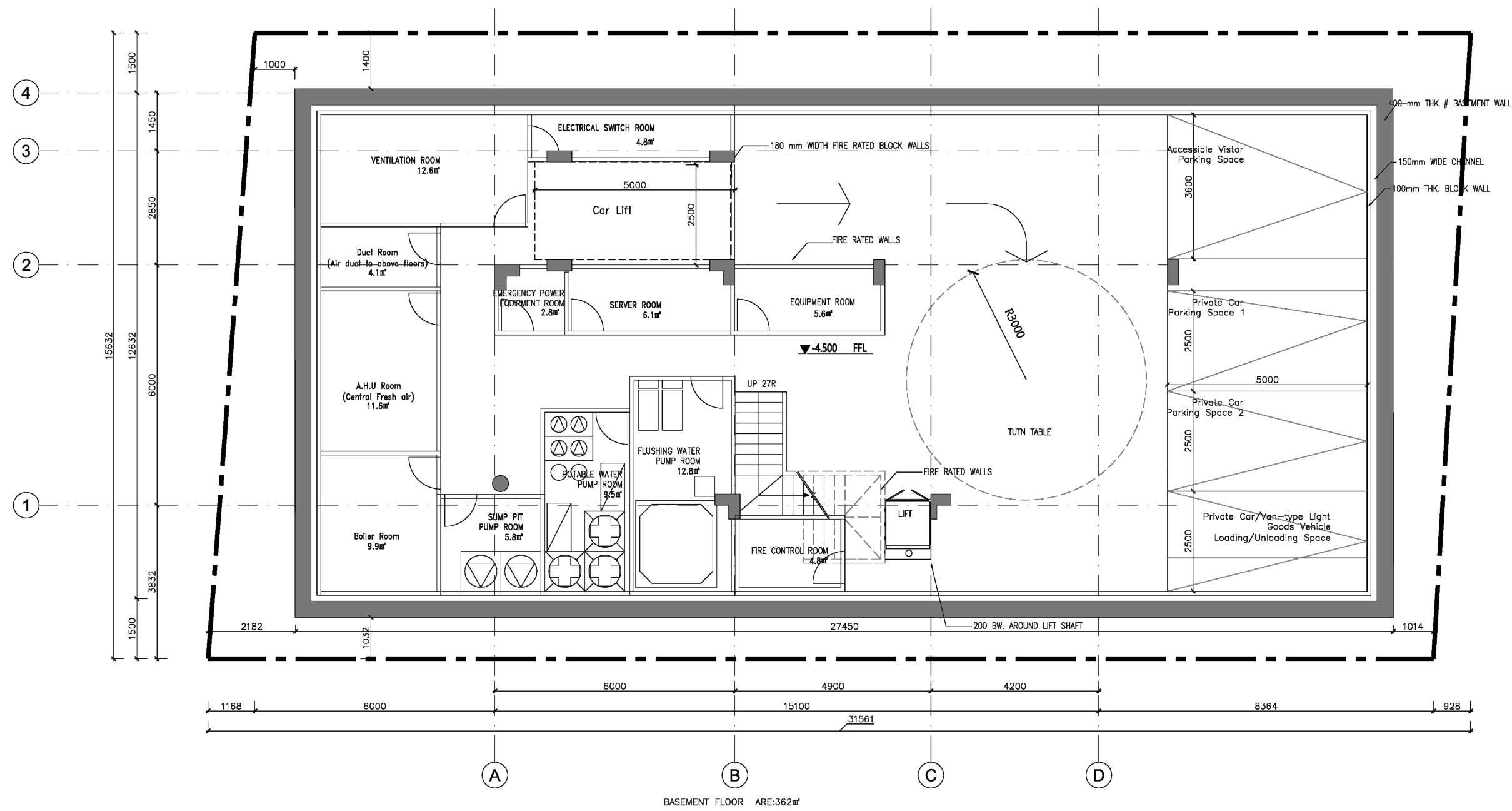
5.4 NO ADVERSE LANDSCAPE IMPACT

5.4.1 The Application Site is situated within an urban landscape context characterised predominantly by low-rise residential buildings. The landscape character of the area is defined by the mature greenery and generous setbacks typical of the KTGE. The Proposed Redevelopment is considered not incompatible with this landscape setting and is unlikely to induce any significant adverse visual or landscape impact.

5.4.2 Compared to the OZP-compliant Scheme, an increase of greenery ratio to not less than 20% (under the current scheme) is proposed as an integral component of the Proposed Redevelopment. A Landscape Proposal attached as **Appendix 3** demonstrates that landscaping, including planters and ground cover planting, will be provided at grade along the site boundary, as well as on the setback podiums. The Proposed Redevelopment also ensures that the provision of basement facilities does not compromise meaningful at-grade greening by allowing sufficient soil depth proposed in PNAP APP-152. These measures serve to soften the building mass, enhance the visual amenity of the development, and reinforce the green and open character of the surrounding streetscape.

APPENDIX 1

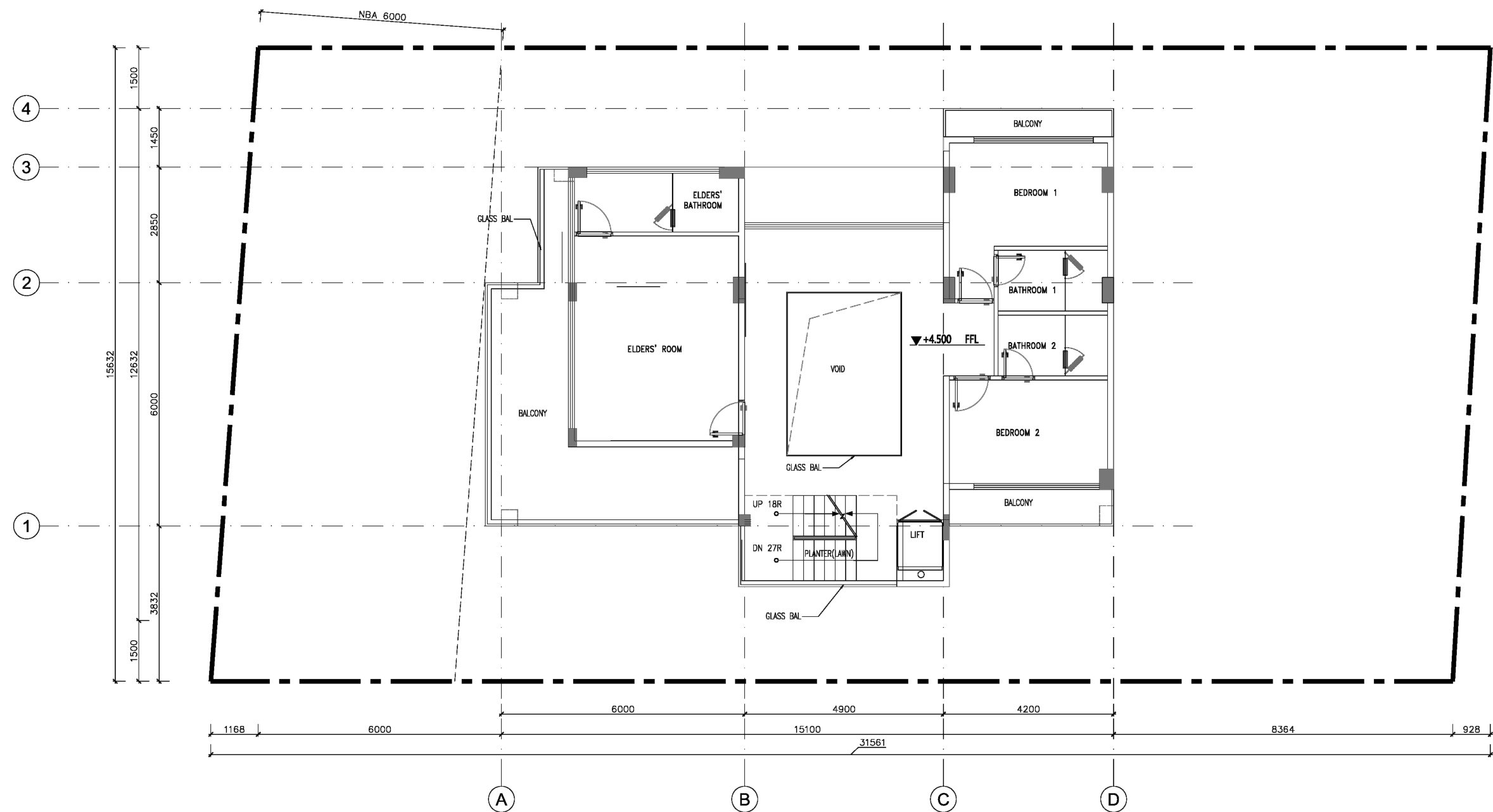
PROPOSED SCHEME

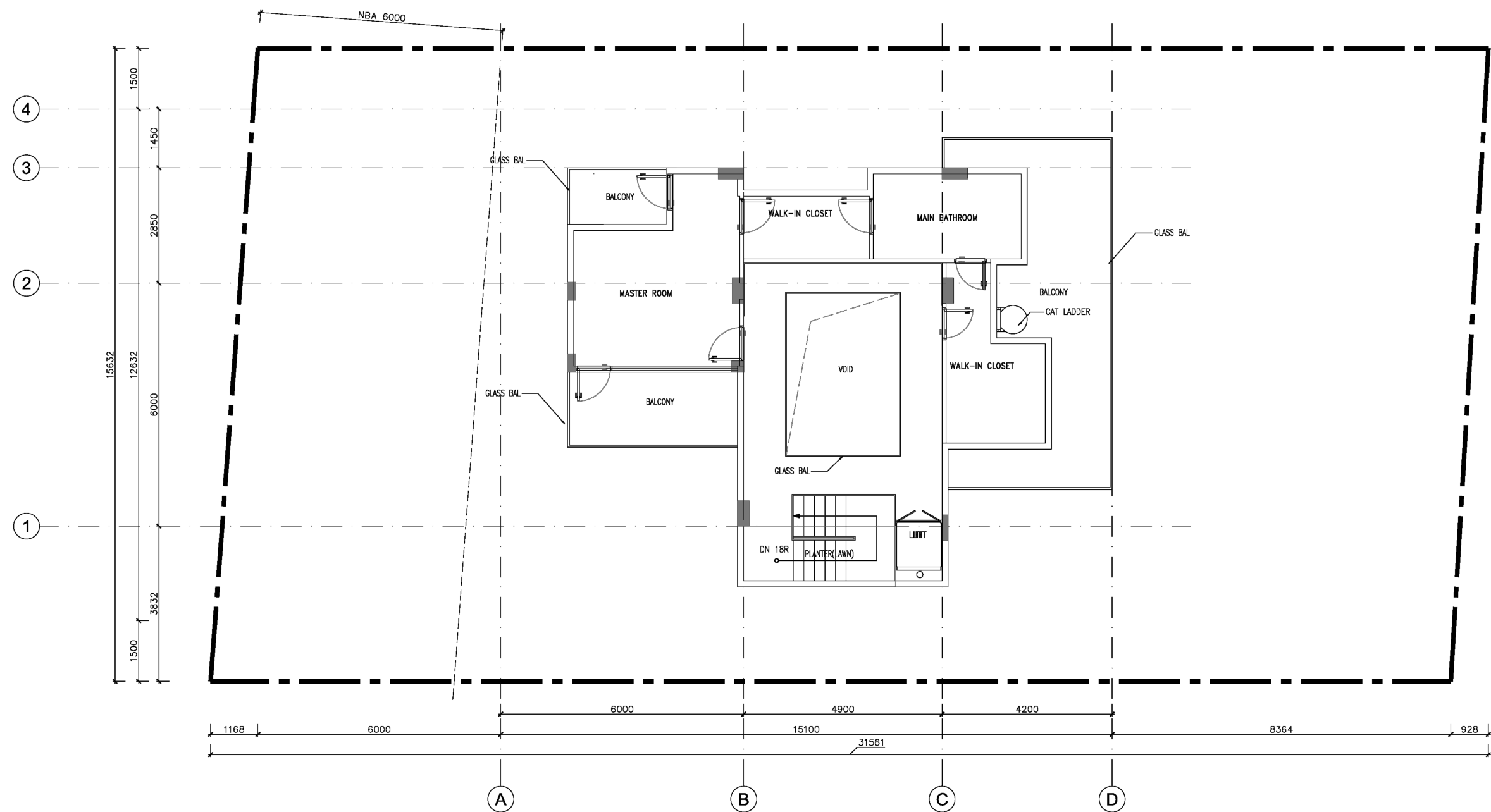


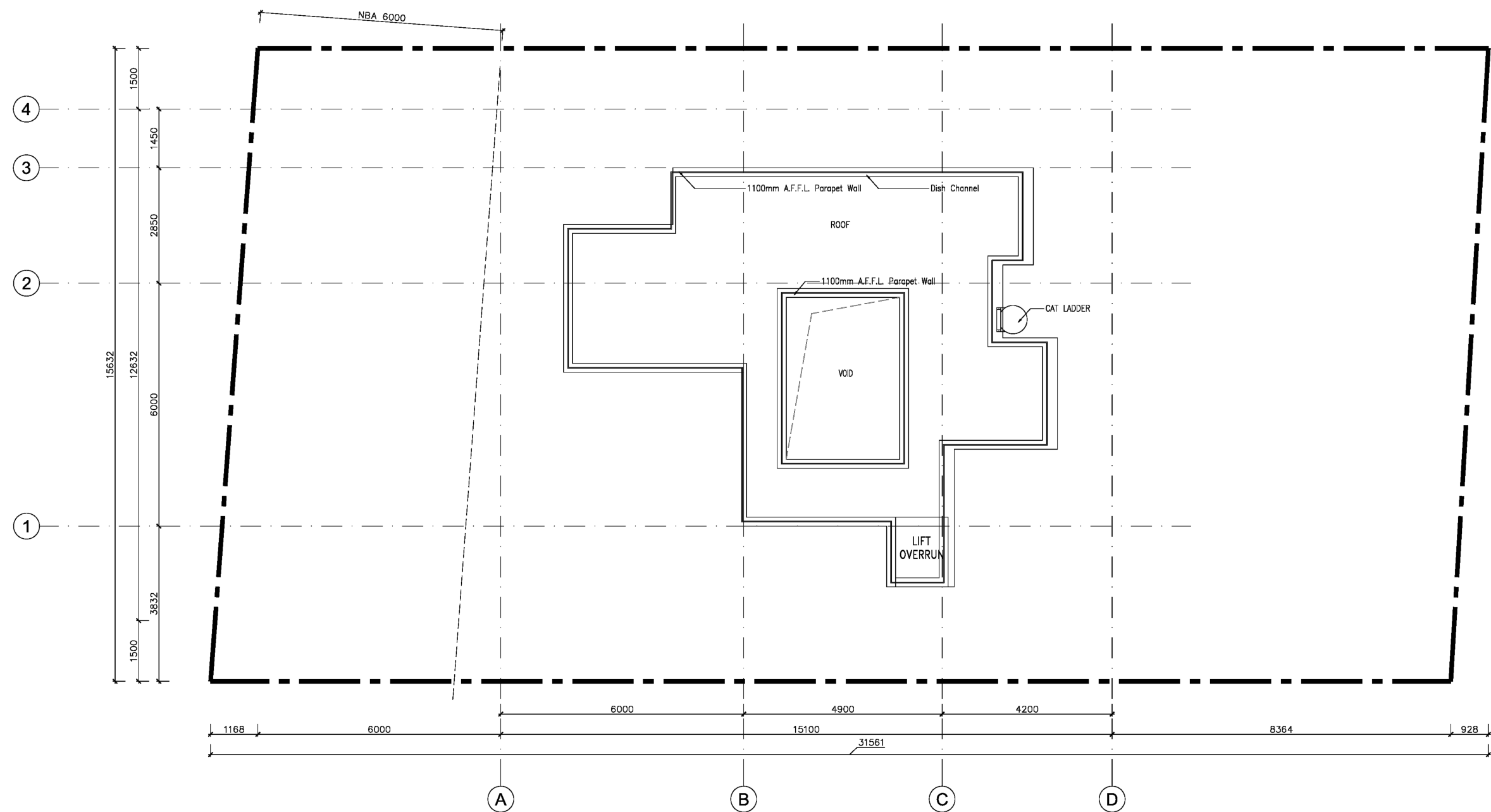


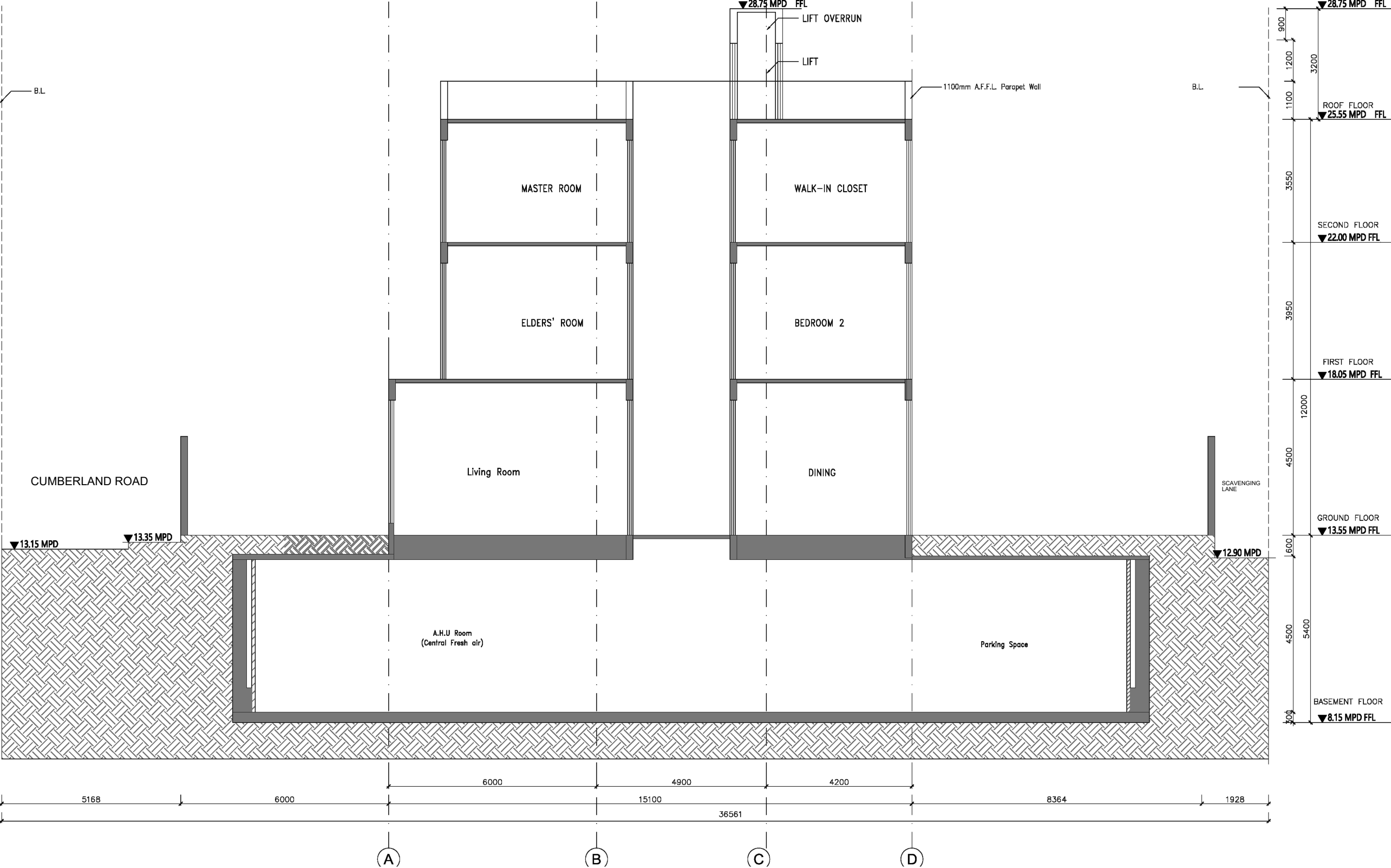
LEGEND

LANDSCAPE AREA Total: 95.6 sqm



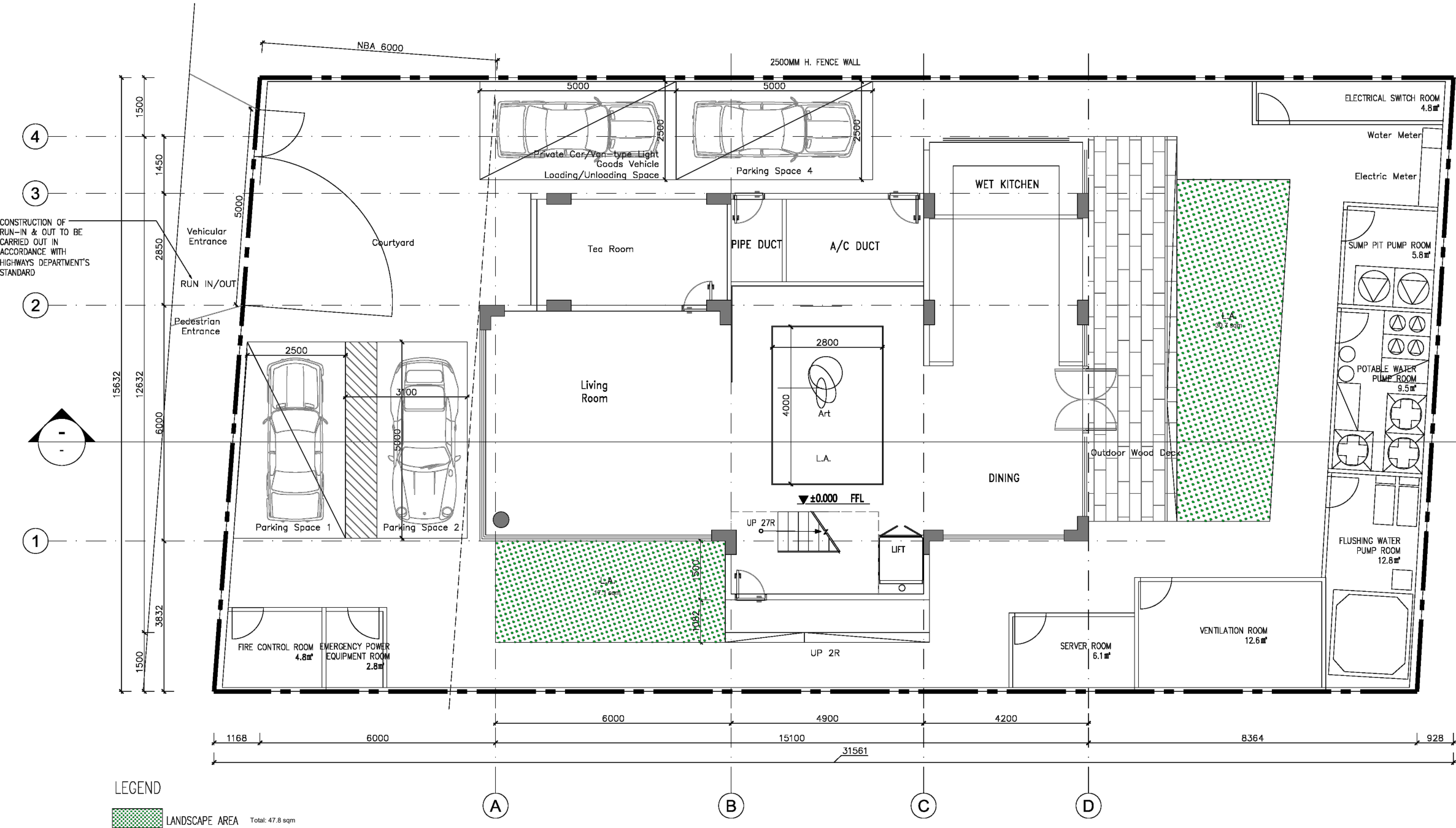


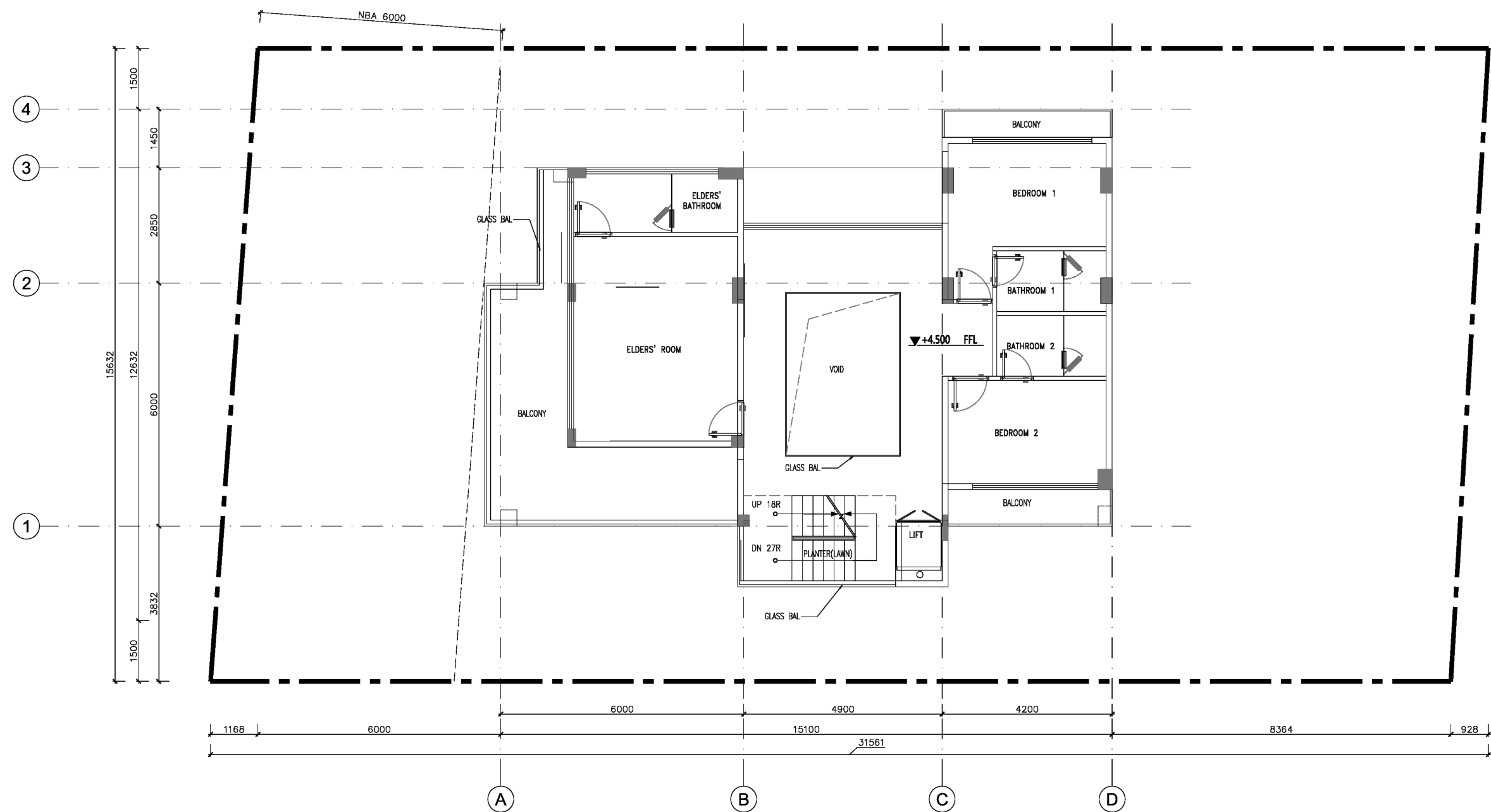


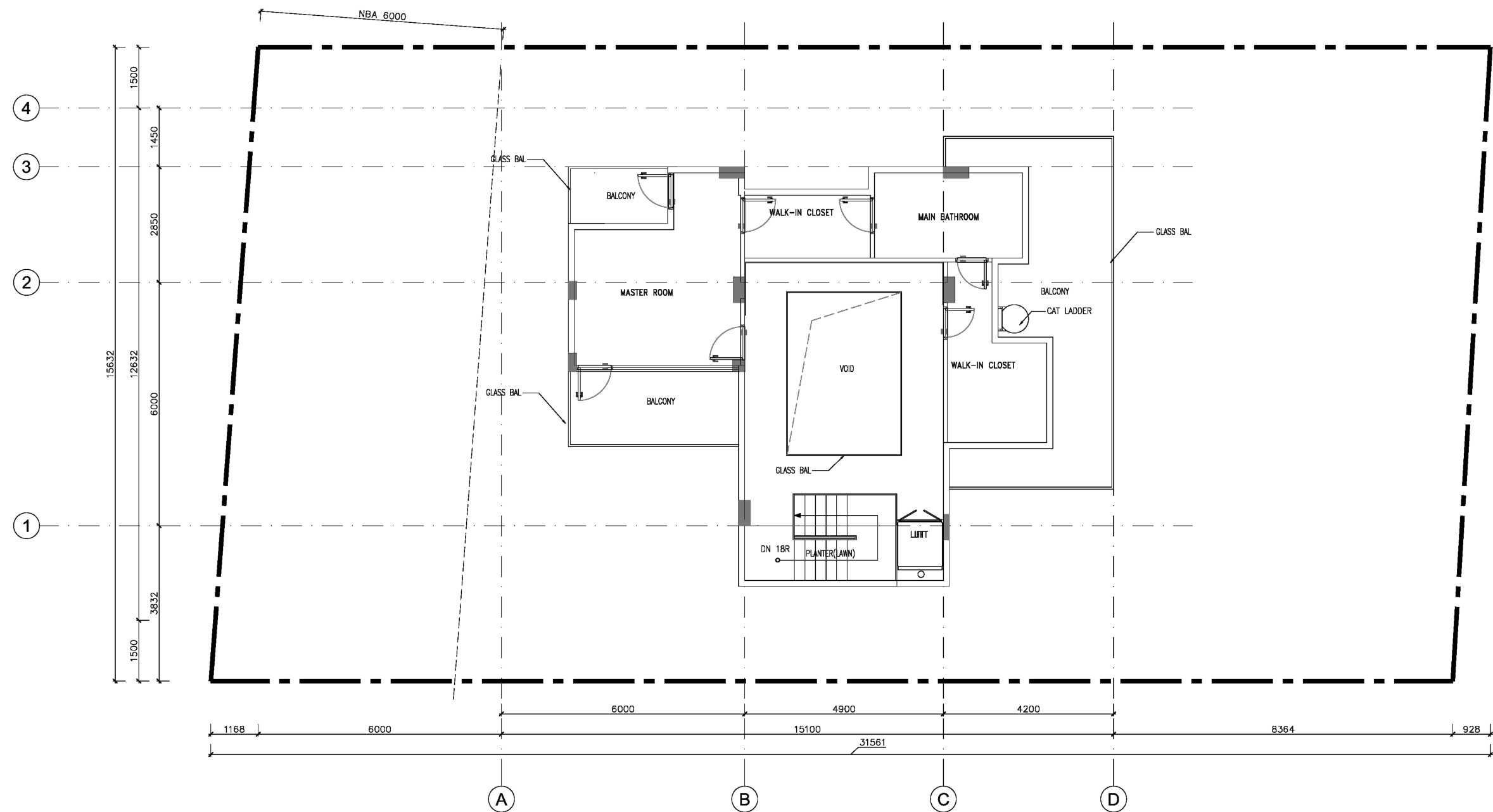


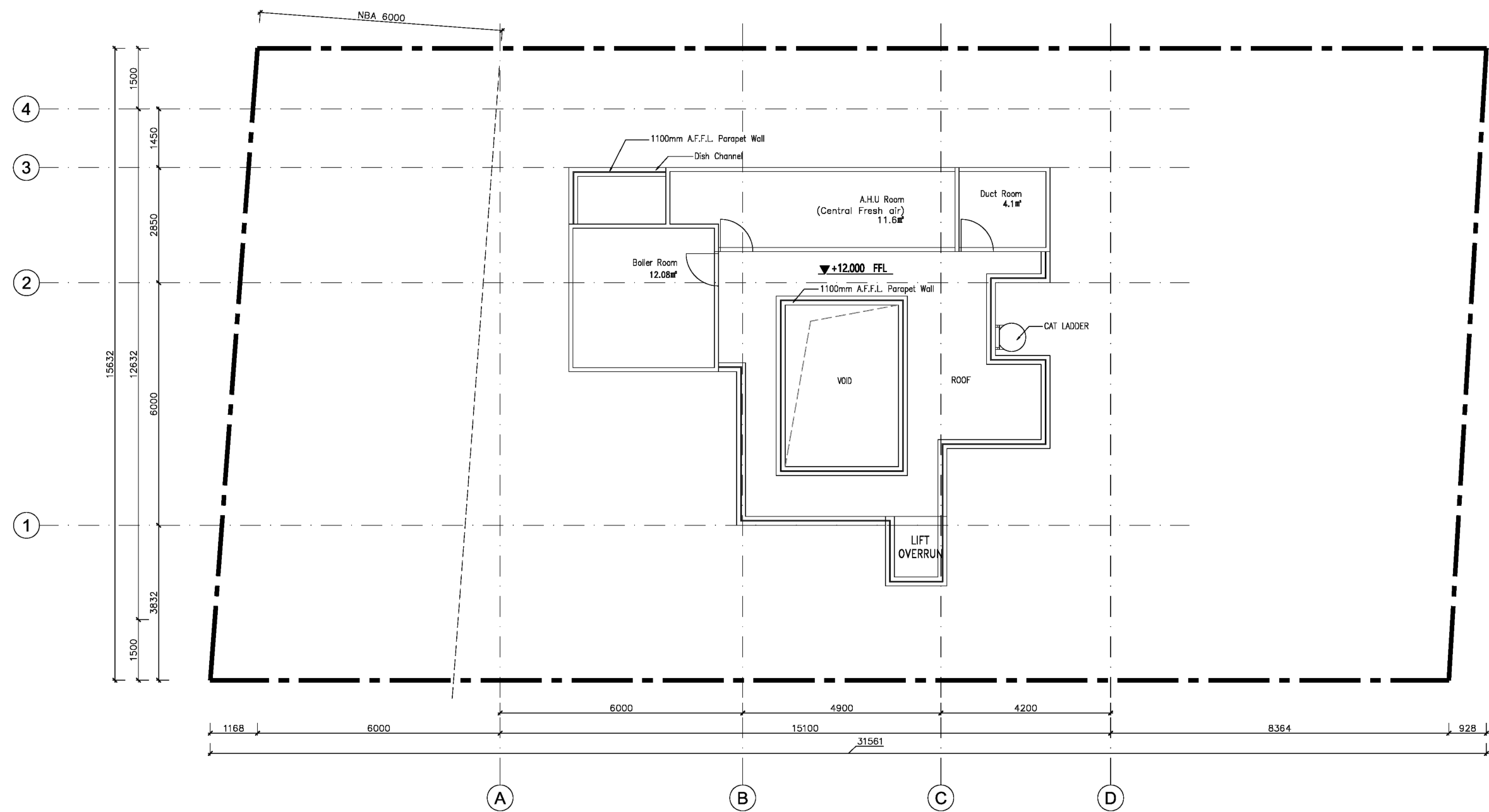
APPENDIX 2

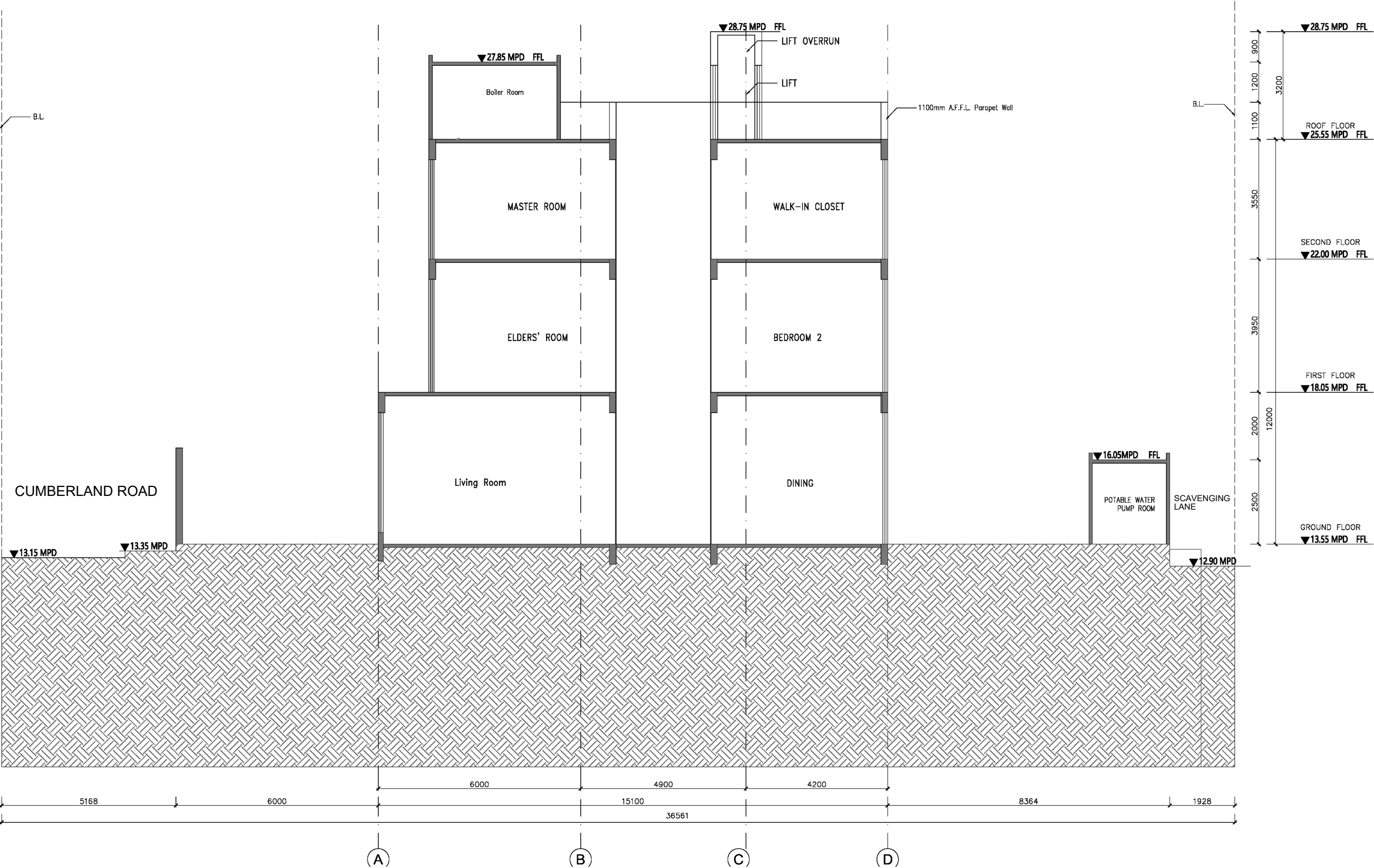
OZP-COMPLIANT SCHEME





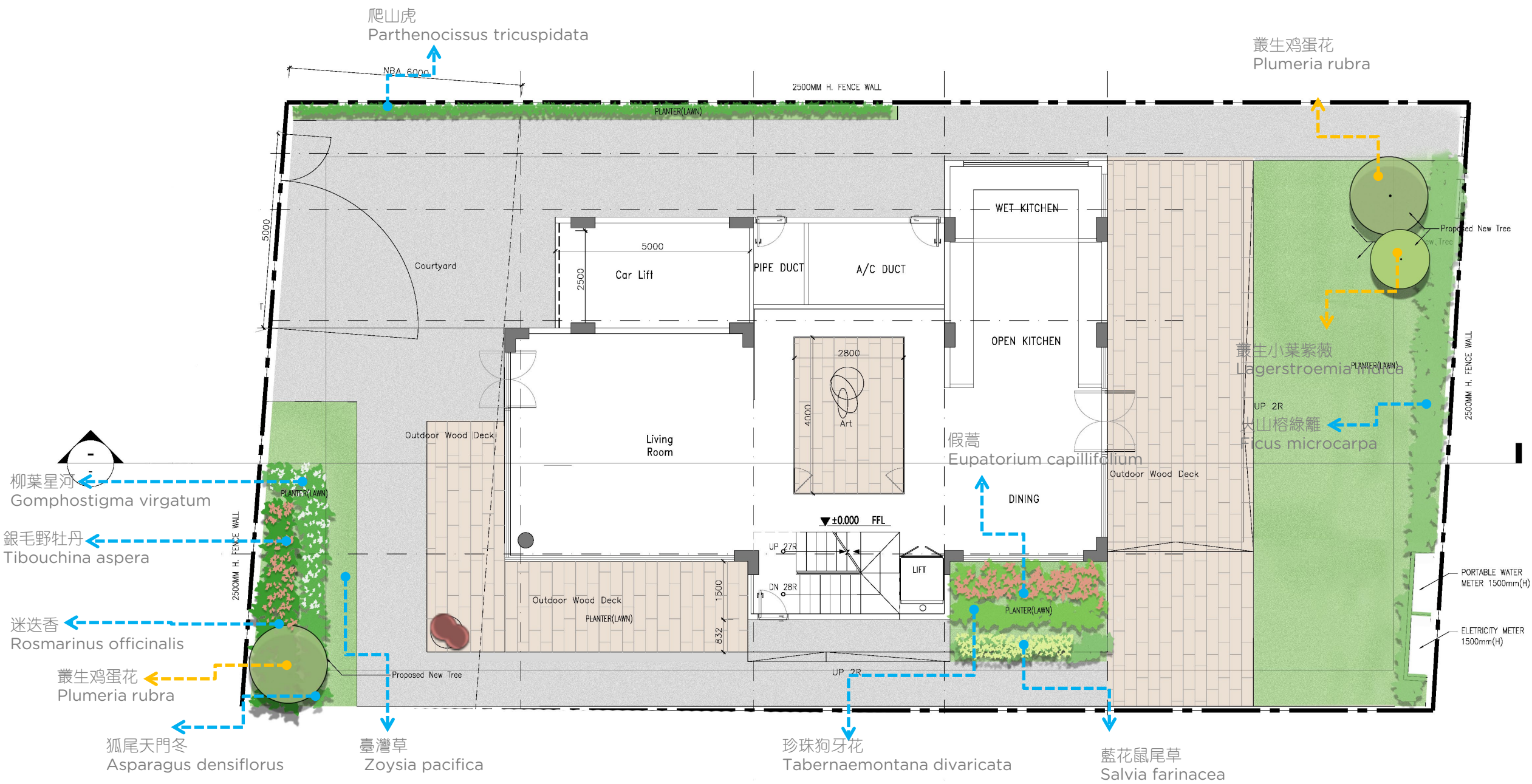






APPENDIX 3

LANDSCAPE PROPOSAL



Trees						
	Chinese Name	Botanical Name	DBH (cm)	Height (cm)	Spread (cm)	quantity
1	叢生鸡蛋花	Plumeria rubra	15	400-450	300-350	2
2	叢生小叶紫薇	Lagerstroemia indica	10	250-300	200-250	1

Schrubs & Ground Covers				
	Chinese Name	Botanical Name	Height (cm)	Spread (cm)
1	台灣草	Zoysia pacifica	/	/
2	狐尾天門冬	Asparagus densiflorus	25-30	25-30
3	迷迭香	Rosmarinus officinalis	30-45	30-40
4	銀邊草	Arrhenatherum elatius	25-30	25-30
5	珍珠狗牙花	Tabernaemontana divaricata	25-30	25-30
6	火山榕綠籬	Ficus microcarpa	180-200	50-60
7	藍花鼠尾草	Salvia farinacea	25-30	25-30
8	柳葉星河	Gomphostigma virgatum	30-45	30-40
9	銀毛野牡丹	Tibouchina aspera	25-30	25-30
10	假蒿	Eupatorium capillifolium	45-60	25-30
11	爬山虎	Parthenocissus tricuspidata	/	/

Feature Tree



叢生雞蛋花
Plumeria rubra



叢生小葉紫薇
Lagerstroemia indica

Schrubs & Ground Covers



臺灣草
Zoysia pacifica



狐尾天門冬
Asparagus densiflorus



迷迭香
Rosmarinus officinalis



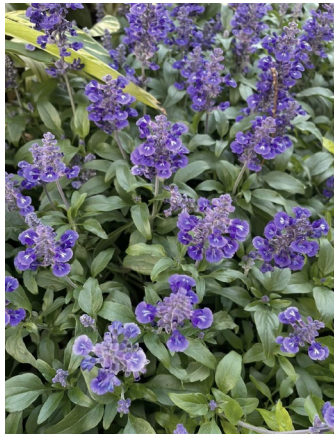
銀邊草
Arrhenatherum elatius



珍珠狗牙花
Tabernaemontana
divaricata



火山榕綠籬
Ficus microcarpa



藍花鼠尾草
Ficus microcarpa



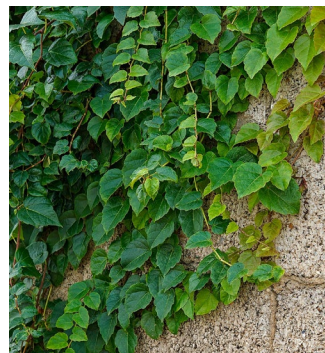
柳葉星河
Gomphostigma virgatum



銀毛野牡丹
Tibouchina aspera



假蒿
Eupatorium capillifolium



爬山虎
Parthenocissus tricuspidata

APPENDIX 4

DRAINAGE PROPOSAL

