

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

MAY 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

EXECUTIVE SUMMARY

This Planning Statement is submitted to the Town Planning Board on behalf of the registered owners, SHENG FANG and YANG JUAN, in support of an application under Section 16 of the Town Planning Ordinance for planning permission for a minor relaxation of the building height restriction at No. 4 Cumberland Road, Kowloon Tong, Kowloon (the "Application Site").

The Application Site is zoned "Residential (Group C) 1" ("R(C)1") under the Approved Kowloon Tong Outline Zoning Plan No. S/K18/21, which is subject to a maximum plot ratio of 0.6 and a maximum building height of 3 storeys. The minor relaxation sought would allow the building height to increase from 3 storeys to 4 storeys inclusive of one basement level, facilitating the redevelopment on the Application Site as a domestic house (the "Proposed Redevelopment"). The addition of a basement level is proposed to accommodate private car parking spaces and ancillary plant rooms below ground, thereby maximising at-grade landscaping provision and achieving a compatible building form above ground.

The application is well-supported in planning terms:

- The Proposed Redevelopment is consistent with the planning intention of the "R(C)1" zone;
- The Proposed Redevelopment will not result in perceptible change to the above-ground massing or bulk, thus fully compatible with the surroundings;
- The proposed basement is of a proportionate and justified scale, accommodating only car parking and essential plant rooms that are functionally necessary for the development;
- Sufficient design merits are provided and greening opportunities are maximised for the Proposed Redevelopment, in view of the relocation of ancillary facilities to the basement level, and;
- No adverse impacts are anticipated for the Proposed Redevelopment in terms of landscape, environmental, and traffic.

In light of the foregoing, it is respectfully submitted to the Town Planning Board that planning permission should be granted.

行政摘要

本規劃綱要代表註冊業主SHENG FANG及YANG JUAN向城市規劃委員會提交，以支持根據《城市規劃條例》第16條就九龍九龍塘金巴倫道4號（「申請地盤」）申請輕微放寬建築物高度限制的規劃申請。

根據已批准的九龍塘分區計劃大綱圖第S/K18/21號，申請地盤劃作「住宅（丙類）1」（「R(C)1」）地帶，受制於最高地積比率0.6及最高建築物高度3層的限制。是次申請的輕微放寬旨在將建築物高度由3層增加至4層（包括一層地庫），以便在申請地盤上重建為一所住宅（「擬議重建項目」）。增設地庫層的目的，在於將私家車停車位及輔助機房等設施移至地下，從而騰出地面層空間以提供充足綠化，並在地面以上呈現更符合周邊環境的建築形態。

本申請在規劃上理據充分，理由如下：

- 擬議重建項目符合「住宅（丙類）1」地帶的規劃意向；
- 擬議重建項目不會對地面以上的建築體量或規模造成明顯改變，因此與周邊環境完全相容；
- 擬議地庫規模適當合理，僅用於容納發展項目在功能上所必需的車位及基本機房設施；
- 鑑於附屬設施及泊車位已遷移至地庫層，擬議重建項目提供了充足的設計增益，並盡量增加綠化機會；及
- 擬議重建項目在景觀、環境及交通方面均預計不會造成任何負面影響。

綜上所述，謹此恭請城市規劃委員會批准有關規劃申請。

（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。）

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1. INTRODUCTION

1.1 DeSPACE (International) Limited, on behalf of the registered owners, SHENG FANG and YANG JUAN, submits this Planning Statement to the Town Planning Board ("TPB") in support of an application under Section 16 of the Town Planning Ordinance for planning permission for a minor relaxation of the building height ("BH") restriction at No. 4 Cumberland Road, Kowloon Tong, Kowloon (the "Application Site"). Please refer to **Figure 1** for the Location Plan.

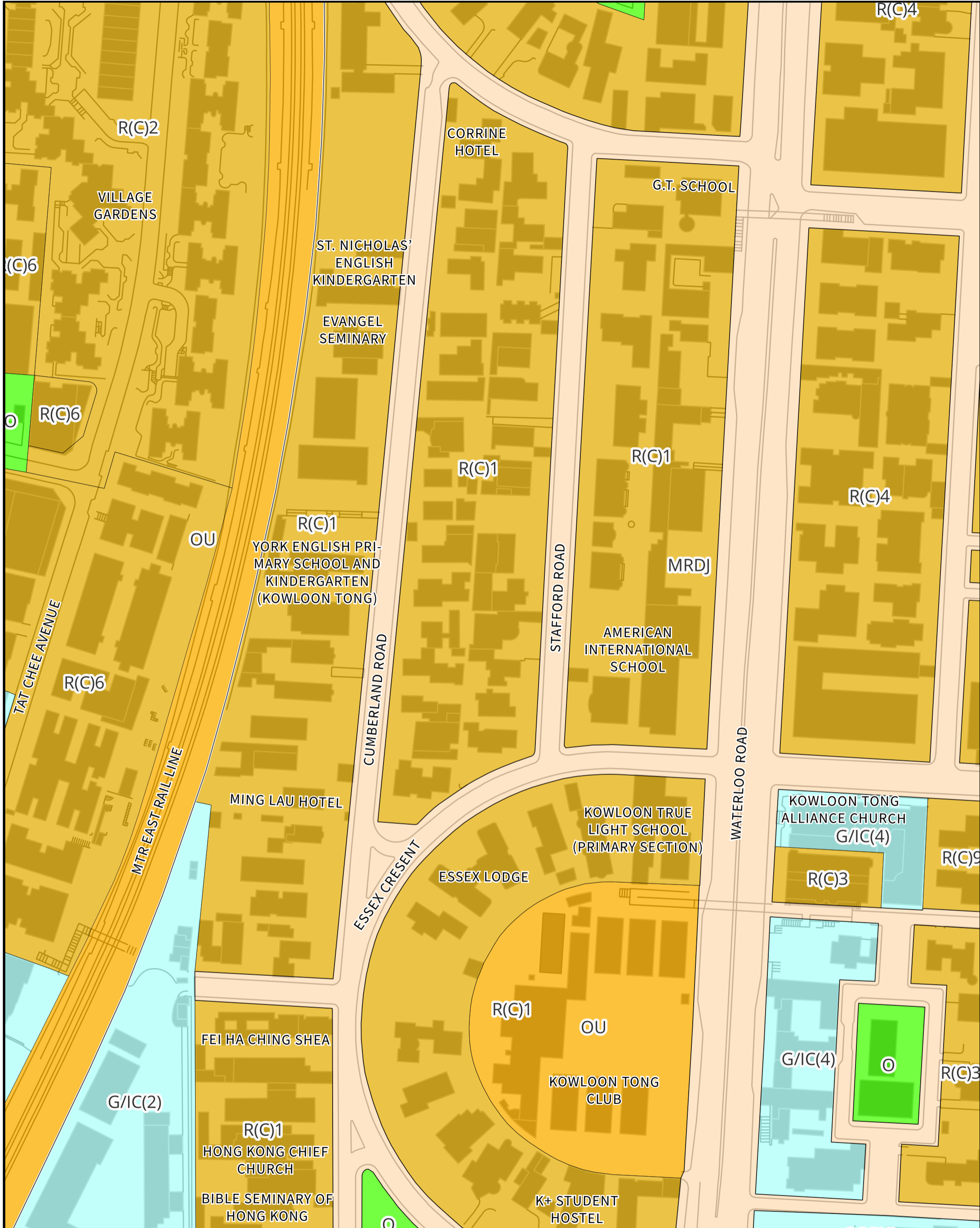
1.2 The Application Site is situated within the Kowloon Tong Garden Estate ("KTGE"), a prestigious low-rise, low-density residential neighbourhood. The site is currently occupied by a vacated two-storey domestic house.

1.3 According to the Approved Kowloon Tong Outline Zoning Plan ("OZP") No. S/K18/21, the Application Site is zoned "Residential (Group C) 1" ("R(C)1"), which provides for low to medium-rise, low-density residential developments subject to a maximum plot ratio ("PR") of 0.6 and a maximum BH of 3 storeys. The Notes of the OZP also illustrates that a minor relaxation of the BH

restriction may be granted by the Board to allow for one basement storey for use as a car park and/or ancillary plant rooms, to be considered on individual merits having regard to the impact on existing trees and the distinctive character of the KTGE.

1.4 The application seeks permission for a minor relaxation of the BH restriction to allow for one storey of basement for car parking and ancillary plant rooms for the permitted house development, consolidating functional and building services requirements below ground so as to maximise at-grade landscaping and preserve the low-rise character of the KTGE.

1.5 The structure of this Planning Statement is as follows. Section 2 sets out the planning policy context. Section 3 reviews relevant approved precedents. Section 4 describes the Proposed Redevelopment and its design merits. Section 5 sets out the planning considerations in support of the application. Section 6 provides a conclusion.



DRAWING TITLE:
LOCATION PLAN

DRAWING NO.:
FIGURE 1

SCALE:
1:1000

LEGEND:

APPLICATION SITE

DATE:
MAY 2026

PREPARED BY:



DeSPACE (International) Limited

2. SITE CONTEXT

2.1 APPLICATION SITE AND SURROUNDING AREAS

2.1.1 The Application Site is located at 4 Cumberland Road, Kowloon Tong, comprising a site area of approximately 478.49 sq. m. (refer to **Figure 2 – Lot Index Plan**). The site is currently occupied by a house.

2.1.2 The Application Site falls within the Kowloon Tong Garden Estate (“KTGE”), a well-established low-rise, low-density residential neighbourhood of recognised character. The surrounding built environment is characterised by high-quality detached houses generally ranging from 1 to 4 storeys in height.

2.1.3 Whilst the immediate vicinity is predominantly residential in nature, the wider neighbourhood accommodates a range of compatible non-residential uses, including educational institutions, religious establishments and hotels.

2.2 LEASES

2.2.1 The Application Site forms part of New Kowloon Inland Lot No. 754 (**Figure 2** refers) and is held under a Government Lease. In common with other leases in the locality, the lot is subject to the following restrictions:

- (a) the lessee shall keep and maintain on the lot a messuage or dwelling house throughout the entire term of the lease;
- (b) rate and range clause;
- (c) offensive trade clause; and
- (d) the lessee shall not erect any additional messuage or dwelling house on the lot without the prior written consent of the Director of Lands.

2.2.2 Should the subject Section 16 application be approved, the owners will be required to apply separately to the Lands Department for a consent under lease for the Proposed Redevelopment or a lease modification to implement the proposal.



DRAWING TITLE:
LOT INDEX PLAN

DRAWING NO.:
FIGURE 2

SCALE:
1:500

LEGEND:

APPLICATION SITE

NON-BUILDING AREA ("NBA") AS SHOWN ON THE KOWLOON TONG OUTLINE DEVELOPMENT PLAN (INDICATIVE ONLY)

DATE:
MAY 2026

PREPARED BY:

 DeSPACE (International) Limited

2. SITE CONTEXT

2.3 ACCESSIBILITY

2.3.1 The Application Site benefits from direct vehicular access via an existing ingress/egress onto Cumberland Road, which functions as a local distributor within the KTGE road network and connects to key arterial routes including Waterloo Road. The site is well served by a range of public transport modes: Kowloon Tong MTR Station (East Rail and Kwun Tong Lines) is located within approximately 700 metres of the site, whilst bus and minibus stops on Waterloo Road and Tat Chee Avenue are accessible within 300 to 400 metres, providing convenient connectivity to the wider metropolitan area.



3. TOWN PLANNING CONTEXT

3.1 STATUTORY PLANNING CONTEXT

3.1.1 According to the Approved Kowloon Tong Outline Zoning Plan (OZP) No. S/K18/21, the Application Site is zoned “Residential (Group C) 1” (“R(C)1”, **Figure 1** refers). As stipulated in the Notes of the OZP, ‘House’ use is under Column 1, for which a planning permission is not required. The zone is subject to a maximum plot ratio (“PR”) of 0.6 and a BH of 3 storeys. Thus, a planning permission is required for minor relaxation of building height restriction for constructing a car park and ancillary plant rooms at basement level.

3.1.2 The planning intention of the “R(C)1” zone is to promote low-rise, low-density residential development, with commercial uses serving the local residential community permissible on application to TPB. In recognition of the need for design flexibility, the Notes of the OZP provide that minor relaxation of the building height restriction, specifically to accommodate one storey of basement constructed or intended for use as a car park and/or ancillary plant room, may be considered by TPB on application,

having regard to the individual planning and design merits of a development or redevelopment proposal. It is further noted that any basement construction shall not cause adverse impacts to existing trees or compromise the distinctive garden estate character of the area.

3.2 NON-STATUTORY PLANNING CONTEXT

3.2.1 In addition to the statutory framework, the Application Site is subject to the guidance set out in the Draft Kowloon Tong Outline Development Plan (“ODP”) No. D/K18/1A. The ODP designates a Non-Building Area (“NBA”) of 6 metres in width along the site boundary abutting Cumberland Road. This setback requirement serves to enhance the local streetscape, safeguard the prevailing scale and spatial disposition of development within the KTGE, and promote air and visual permeability through the neighbourhood. Compliance with the NBA requirement is a standard material consideration for TPB in its assessment of applications for building height relaxation within the zone.

3. TOWN PLANNING CONTEXT

3.3 SIMILAR PLANNING APPROVALS

3.3.1 There is a well-established precedent of the Board granting planning permission for minor relaxation of the building height restriction to accommodate basement development within the "R(C)1" zone. A total of 4 such applications have been approved over the past 10 years, as summarised in **Table 1** below.

3.3.2 The approved applications cited were granted on the basis of demonstrated planning and design merits. Common grounds for approval included the provision of generous landscaping and greenery along street frontages, increased at-grade greening, innovative architectural design features such as stepped terraces with integrated planting, and the absence of rooftop structures. These measures collectively contributed to an enhanced streetscape and a built form sympathetic to the garden estate setting of the KTGE. The Proposed Redevelopment is therefore consistent with the planning and design rationale underlying the TPB's decisions on comparable applications, and approval of the current application would be in line with TPB's decision on similar cases.

3. TOWN PLANNING CONTEXT

TABLE 1 – SIMILAR APPROVED APPLICATIONS FOR MINOR RELAXATION OF BUILDING HEIGHT RESTRICTION FOR BASEMENTS WITHIN “R(C)1” ZONE ON THE OZP IN THE PAST 15 YEARS

Case No.	A/K18/350	A/K18/349	A/K18/342	A/K18/331	A/K18/326	Summary
Approval Date	05/09/2025	05/09/2025	04/03/2022	13/09/2019	03/08/2018	
Address	3 Lincoln Road	5 Lincoln Road	14 Kent Road	7 Lincoln Road	147 Waterloo Road	
Site Area	945.28 sq. m.	948.25 sq. m.	998.8 sq. m.	724.92 sq. m.	822.966 sq. m.	
Gross Floor Area (GFA)	540.35 sq. m.	540.41 sq. m.	599 sq. m.	434.95 sq. m.	564.726 sq. m.	
Floor Area for Basement	689.165 sq. m.	689.211 sq. m.	640.5 sq. m.	294 sq. m.	626.855 sq. m.	
% of Basement Floor Area over Site Area	73%	73%	64%	41%	76%	41-76%
Plot Ratio (PR)	0.6	0.6	0.6	0.6	0.6862	0.6 - 0.6862
Building Height (BH)	11.5m	11.5m	11.5m	13m	11.9m	11.5 - 13m
Site Coverage (SC)	About 24.24%	About 24.03%	About 23.7%	Not more than 75%	About 36.67%	23.7% to 75%
Car Parking	3 private car parking spaces and 1 accessible visitor car parking space in B/F	3 private car parking spaces and 1 accessible visitor car parking space in B/F	3 private car parking spaces in B/F	2 private car parking spaces in B/F and 1 visitor car parking space on G/F	2 private car parking spaces and 1 accessible visitor car parking space in B/F	2 - 4 car parking spaces
Loading/Unloading (“L/UL”) Facilities	1 LGV space on G/F	1 LGV space on G/F	1 LGV space in B/F	1 temporary LGV space on G/F	1 temporary LGV space on ramp to car park on G/F	1 (temporary) LGV space
Greening Ratio	20%	20%	18.20%	15%	N/A	15 - 20%
Planning and Design Merits Considered by TPB	Building set back by 6m; stepped terraced design; overall 20% greenery at grade; no plant rooms provided on roof level		Building set back of 12.24m; decorative panel or lighting features on frontage; maximizing greenery coverage to 18.2%; preservation of existing tree	Building set back of 6m; efforts in maximising greening opportunities; in excessive basement size	Preservation of existing tree; no plant rooms provided on ground and roof levels	Building set backs, maximising greening opportunities; preservation of existing tree; stepped terrace design; in excessive basement size; no plant rooms above ground level

4. THE PROPOSED REDEVELOPMENT

4.1 DEVELOPMENT SCHEME

4.1.1 The applicant seeks planning permission for a minor relaxation of the building height restriction from 3 storeys to 4 storeys (with additional 1 storey for 1 basement level) to facilitate the comprehensive redevelopment of the site as a single quality domestic house. The Proposed Redevelopment will comprise 3 domestic storeys above ground situated over a fully functional basement floor, resulting in a built form that remains modest in scale and sympathetic to the prevailing character of the KTGE.

4.1.2 The proposed basement level is designed to accommodate essential ancillary facilities, including 3 private car parking spaces, 1 accessible visitor car parking space, and ancillary plant rooms. By consolidating these functional elements below ground, the proposal maximises the availability of at-grade land for high-quality soft and hard landscaping, thereby contributing positively to the amenity and visual character of both the site and the wider streetscape. The key development parameters of the Proposed Redevelopment are summarized in the **Table 2** below, while the Proposed Scheme is attached in **Appendix 1** with an OZP-compliant Scheme is attached in **Appendix 2** for comparison:

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 286.83 sq. m.	About 286.83 sq. m. (1)	B(P)R complied
Plot Ratio ("PR")	About 0.60	About 0.60	OZP Complied
Building Height ("BH")	About 25.4 mPD	About 25.4 mPD	JPN5 complied
No. of Storeys	3 storeys	<u>4 storeys (including 1 level of basement)</u>	Minor relaxation to be sought
Site Coverage ("SC")	About 26%	<u>Not more than 30%</u>	Within the range to cases in Table 1
Ratio of Basement to Site Area	N/A	<u>Maximum 76%</u>	Within the range to cases in Table 1
Greening Ratio	About 8.5%	<u>Not less than 20%</u>	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 PLANNING AND DESIGN MERITS

4.2.1 The proposed minor relaxation of the building height restriction is underpinned by a range of substantive planning and design merits that collectively demonstrate a positive contribution to the neighbourhood. To contextualise these merits, it is instructive to consider the Proposed Redevelopment against an OZP-compliant scheme (**Appendix 2** refers) that does not incorporate a basement. Under such a compliant scheme, ancillary facilities including water tanks and plant rooms would necessarily be relocated to the ground and roof levels, and the greenery ratio would fall below the 20% threshold typically expected by TPB. The Proposed Redevelopment, by contrast, achieves a materially superior planning and design outcome in every measurable respect, as set out below and illustrated in **Appendix 3 – Landscape Proposal**.

4.2.2 Stepped Height Design

The Proposed Redevelopment adopts a stepped height massing strategy in which the upper floors are progressively set back relative to the floors below. This articulation of building form reduces the perceived visual bulk of the development as experienced from pedestrian level along Cumberland Road, and introduces a dynamic, human-scaled profile that is more sensitive to the garden estate character of the KTGE than a uniform box-form building of equivalent floor area.

4. THE PROPOSED REDEVELOPMENT

4.2.3 Building Setback in Compliance with the Kowloon Tong ODP

A 6-metre building setback from Cumberland Road is maintained in full compliance with the non-building area requirement stipulated under the ODP. This generous setback preserves the open, verdant character of the street frontage and ensures that the Proposed Redevelopment reinforces rather than erodes the defining spatial qualities of the KTGE. The setback zone is proposed to be soft-landscaped with trees and water bodies, further contributing to the green frontage as experienced from the public realm.

4. THE PROPOSED REDEVELOPMENT

4.2.4 Enhanced Greening Ratio

The Proposed Redevelopment achieves a greenery ratio of not lower than 20%, typically expected by TPB for private developments in KTGE. 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 not be capable of achieving the 20% threshold, as the building footprint at grade would occupy a proportionally greater share of the site area with 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. THE PROPOSED REDEVELOPMENT

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

5.1 IN LINE WITH THE PLANNING INTENTION OF THE "R(C)1" ZONE

5.1.1 The Proposed Redevelopment is fully consistent with the planning intention of the "R(C)1" zone, which seeks to facilitate low-rise, low-density quality residential development within an established garden estate setting. The proposal retains a domestic house use as the principal use of the site, complies with the statutory maximum PR of 0.6, and does not exceed 3 storeys above ground. The minor relaxation sought relates solely to the accommodation of one storey of basement for car parking and ancillary plant room purposes, which is a provision expressly contemplated by the Notes of the OZP.

5.1.2 Of particular significance is the fact that TPB has previously approved a series of planning applications for minor relaxation of the building height restriction on materially identical grounds, namely to allow for one storey of basement for car parking spaces and/or ancillary plant room use within the same "R(C)1" zone of the Kowloon Tong OZP. As summarised in **Table 1** above, these approved precedents reflect a consistent recognition by TPB that such relaxations afford necessary design flexibility without increasing the domestic GFA, and that they are capable of being accommodated without prejudice to the garden estate character of the KTGE.

5.1.3 The current proposal is advanced on precisely the same planning rationale and is directly analogous to the aforementioned approved cases in all material respects. Having regard to the established decision-making pattern of TPB, it is respectfully submitted that there are no planning grounds to depart from the approach consistently taken in comparable applications, and that planning permission should similarly be granted in the present case.

5. PLANNING CONSIDERATIONS

5.2 COMPATIBLE WITH THE SURROUNDING DEVELOPMENT

5.2.1 As the proposed minor relaxation involves only the addition of a basement floor below existing ground level, it will not result in any perceptible change to the massing or bulk of the development above ground. The Proposed Redevelopment will present as a 3-storey domestic house from the public realm, which is fully in keeping with the prevailing built form of the surrounding neighbourhood, where buildings are generally 1 to 3 storeys in height.

5.2.2 Beyond the scale of the development, the compatibility of the Proposed Redevelopment with its surroundings is actively reinforced through a series of considered design measures. A 6-metre building setback from Cumberland Road is strictly observed in accordance with the NBA requirement under the Kowloon Tong ODP, preserving the open and verdant character of the street frontage that is so integral to the garden estate setting of the KTGE. The adoption of a stepped height strategy, whereby the upper floors are progressively set back relative to the floors below, further serves to reduce the perceived visual bulk of the development as experienced from pedestrian level and ensures that the building profile reads as slender and well-proportioned within its context.

5.2.3 At grade, generous soft landscaping incorporating trees, shrubs, and ground cover planting is proposed, maintaining the continuity of the mature green streetscape character that defines the KTGE. Taken together, these measures demonstrate that the Proposed Redevelopment is not merely compatible with its surroundings in a passive sense, but makes a positive and active contribution to the quality and character of the neighbourhood.

5. PLANNING CONSIDERATIONS

5.3 APPROPRIATE DEVELOPMENT SCALE

5.3.1 The scale of the proposed basement is considered reasonable and proportionate (maximum 70% of the Site Area) to the functional requirements of the Proposed Redevelopment, and is not excessive in the context of the site area. The basement footprint is directly dictated by the operational and technical requirements of the development, as elaborated below.

5.3.2 The basement accommodates 3 private car parking spaces and 1 accessible visitor car parking space in satisfaction of the parking requirements stipulated in the Hong Kong Planning Standards and Guidelines (“HKPSG”). In addition, a range of essential building services facilities are located at basement level in accordance with functional, building services, geotechnical, and structural design requirements. The consolidation of these ancillary facilities below ground is a considered design response that minimises above-ground building bulk and maximises the availability of at-grade land for landscaping, where the greening ratio exceeds the minimum requirements of 20% as stipulated in the Sustainable Building Design Guidelines.

5.3.3 The above-ground building footprint is minimised as far as practicable, and the remaining at-grade areas are devoted to generous soft landscaping. The development parameters, including PR and SC, remain within the statutory limits prescribed by the OZP Notes. The proposed basement is therefore considered to be of an appropriate and justifiable scale.

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, a increase of greening ratio to not less than 20% is proposed as an integral component of the Proposed Redevelopment. Landscaping, including trees, shrubs, 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.

5. PLANNING CONSIDERATIONS

5.5 NO ADVERSE ENVIRONMENTAL IMPACTS

5.5.1 Noise

The Application Site is not subject to any known significant noise source. Adverse noise impacts on the Proposed Redevelopment are not anticipated. Nonetheless, the planning and design of the development will comply with the relevant noise planning standards and guidelines under the HKPSG to ensure that no noise nuisance will arise.

5.5.2 Air Quality

There is no active industrial chimney or major air pollution source within 200 metres of the Application Site. The Proposed Redevelopment incorporates a basement car park, which will be designed and operated in compliance with the requirements of ProPECC PN 2/96 – Control of Air Pollution in Car Parks and other applicable guidelines. Sufficient buffer distances from vehicular emission sources as required under the HKPSG will be maintained. Adverse air quality impacts are not anticipated.

5.5.3 Sewerage and Drainage

Given the modest scale of the Proposed Redevelopment as a single domestic house, adverse sewerage or drainage impacts on the surrounding areas are not anticipated. Sewage and surface water drainage will be properly connected to the existing public drainage infrastructure and shall be handled in the General Building Plans submission stage.

5.5.4 In summary, the proposed car parking and plant room uses at basement level are demonstrated to have insignificant environmental impacts on the surrounding area. No material adverse impacts on drainage or the local environment are expected to arise from the Proposed Redevelopment.

5. PLANNING CONSIDERATIONS

5.6 NO ADVERSE TRAFFIC IMPACT

5.6.1 The Application Site currently benefits from an existing vehicular ingress/egress onto Cumberland Road, although this access arrangement is not formally stipulated in the Government Lease. The Proposed Redevelopment, by incorporating a purpose-designed basement car park with 2 private spaces and 1 accessible visitor space, will provide a formalised and well-managed parking arrangement that is expected to represent an improvement over the existing situation in terms of on-site vehicle accommodation. It should be also noted that the number of parking spaces provided in the Proposed Scheme, which is in accordance with the HKPSG, would not be possible in the OZP-compliant scheme due to a constrained site area.

5.6.2 Due to site constraints, the provision of 1 L/UL space for private cars, van-type LGVs is the only viable option in the Proposed Scheme. The Applicant would ensure that all L/UL activities for the Proposed Redevelopment will only take place within the Site, and that no larger LGVs can conduct L/UL activities within the Site or obstruct the public footpath and carriageway on Cumberland Road.

5.6.3 The Proposed Redevelopment constitutes a single-family domestic house, and trip generation associated with the development will therefore remain minimal. No adverse impact on the capacity or operation of the surrounding road network is anticipated. Therefore, the proposed minor relaxation of building height is not expected to give rise to any adverse traffic impact on the surrounding road network.

6. CONCLUSION

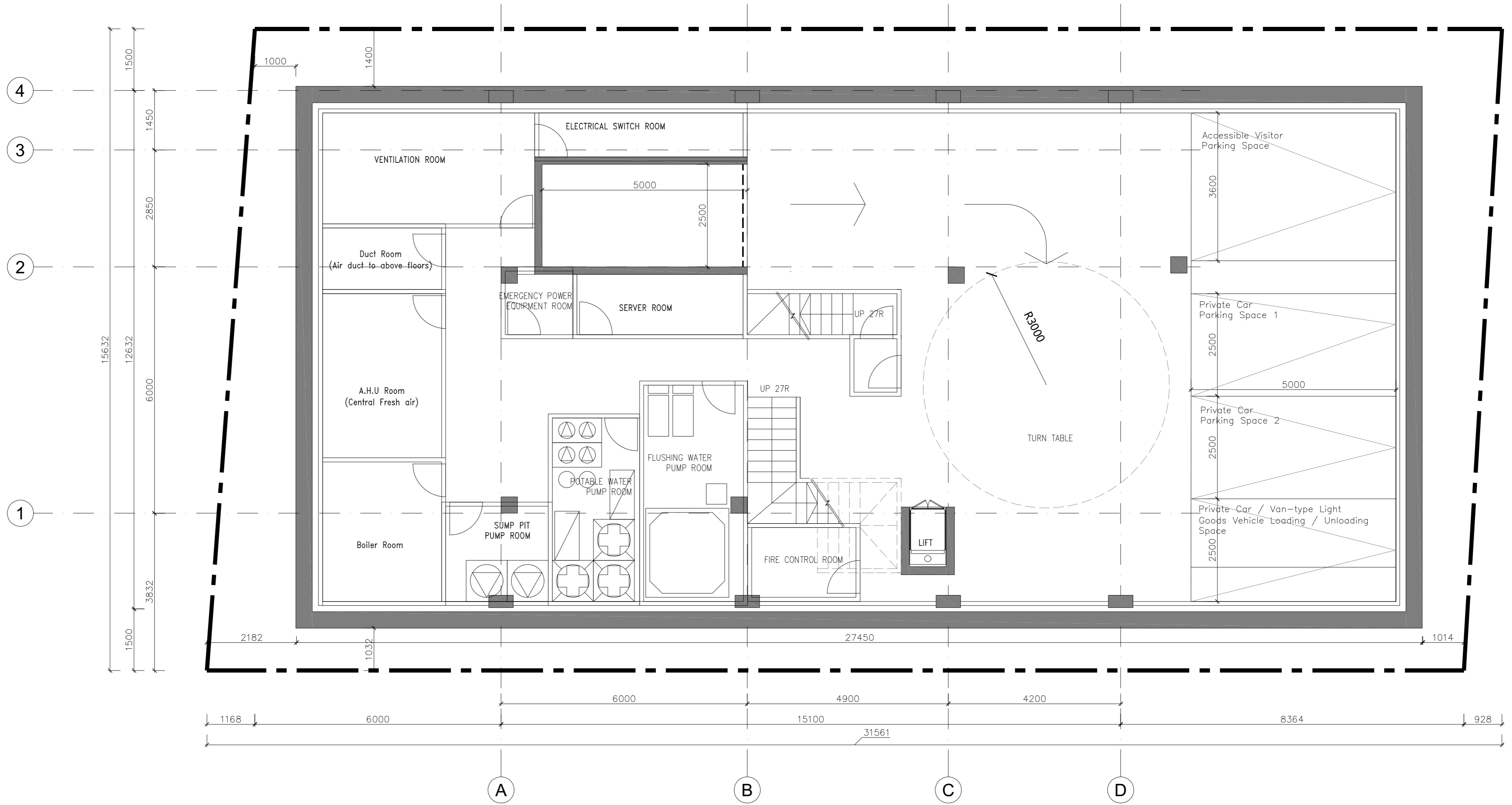
6.1 This application seeks a minor relaxation of the building height restriction from 3 storeys to 4 storeys (inclusive of one basement level) to facilitate the comprehensive redevelopment of the Application Site as a single quality domestic house at 4 Cumberland Road, Kowloon Tong.

6.2 The Proposed Redevelopment is fully justified on the following grounds:

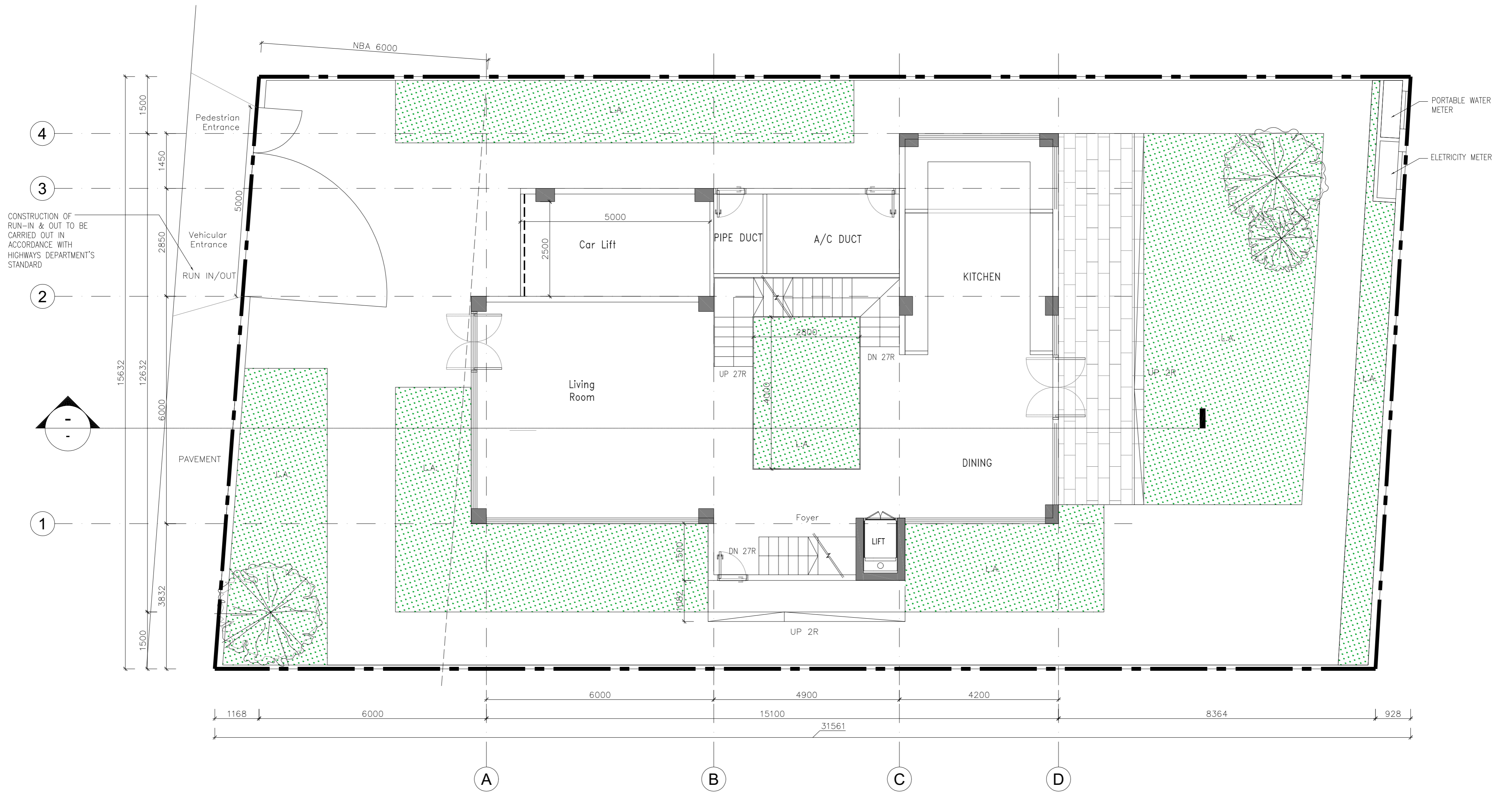
- a) The Proposed Redevelopment is consistent with the planning intention of the "R(C)1" zone;
- b) The Proposed Redevelopment will not result in perceptible change to the above-ground massing or bulk, thus fully compatible with the surroundings;
- c) The proposed basement is of a proportionate and justified scale, accommodating only car parking and essential plant rooms that are functionally necessary for the development;
- d) Sufficient design merits are provided and greening opportunities are maximised for the Proposed Redevelopment, in view of the relocation of ancillary facilities to the basement level, and;
- e) No adverse impacts are anticipated for the Proposed Redevelopment in terms of landscape, environmental, and traffic.

6.3 In light of the foregoing, it is respectfully submitted that the application is well-founded in planning terms and that planning permission should be granted by TPB accordingly.

APPENDIX 1 PROPOSED SCHEME



BASEMENT FLOOR



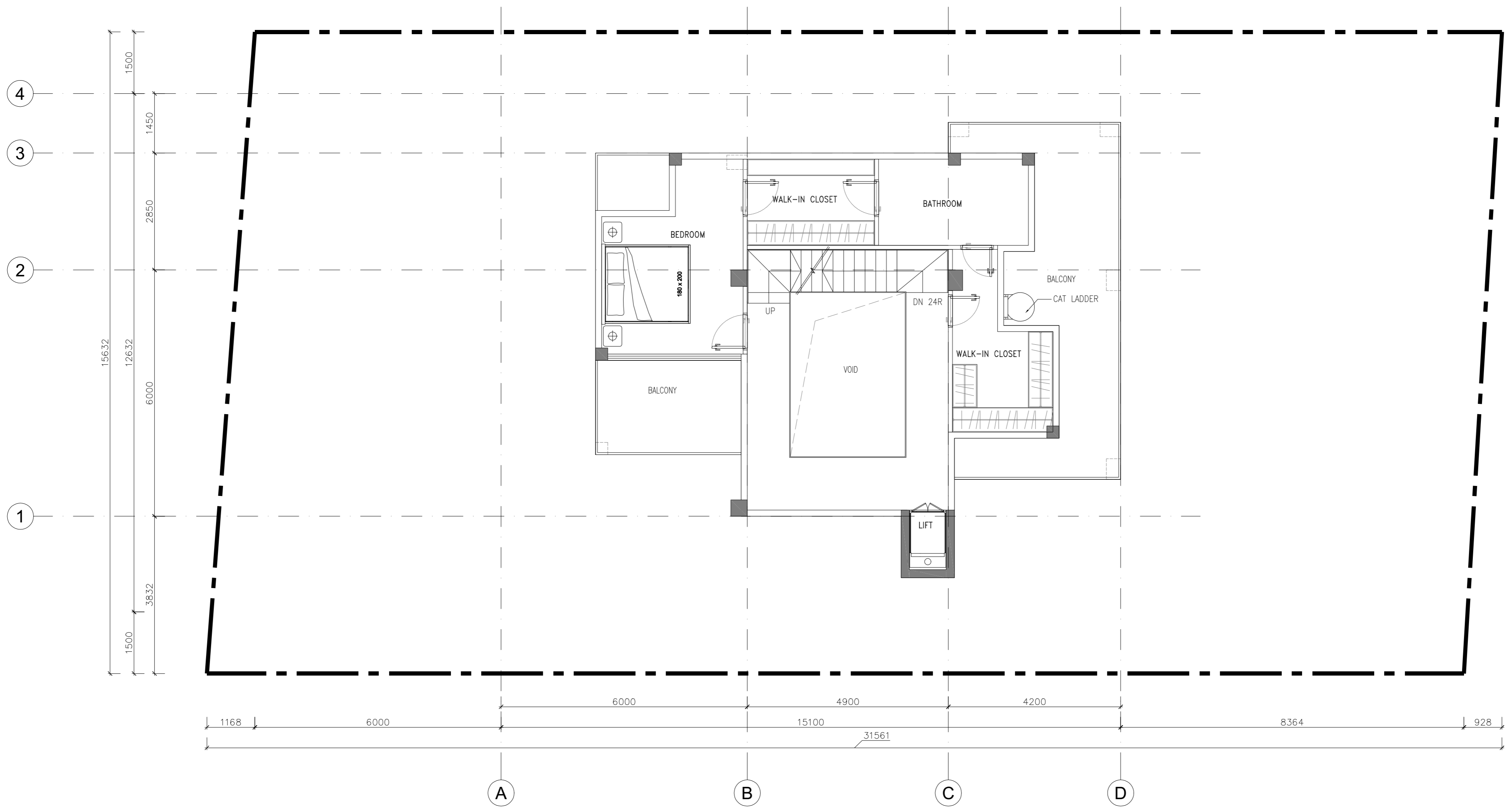
CONSTRUCTION OF RUN-IN & OUT TO BE CARRIED OUT IN ACCORDANCE WITH HIGHWAYS DEPARTMENT'S STANDARD

PORTABLE WATER METER
ELETRICITY METER

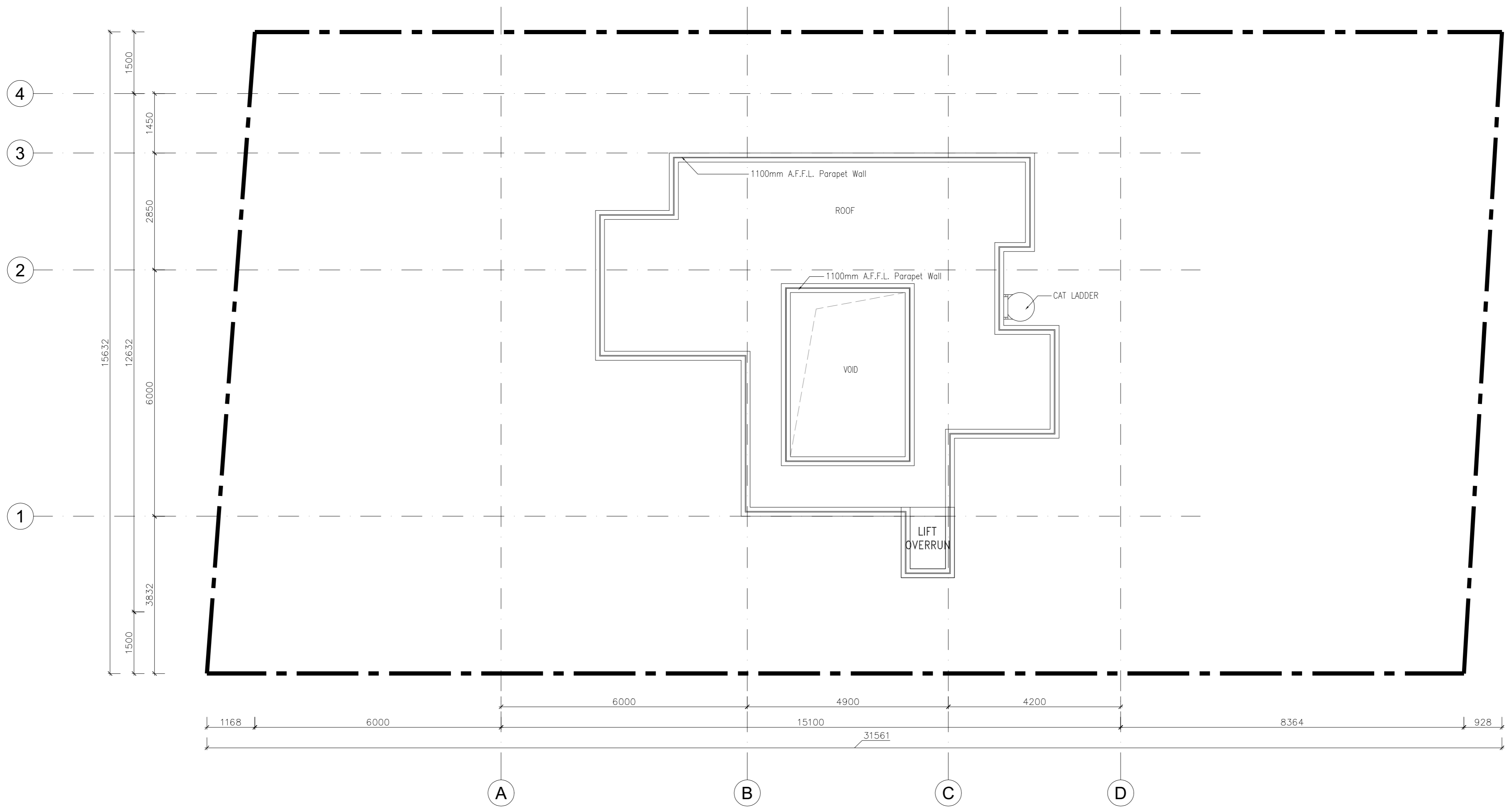
GROUND FLOOR



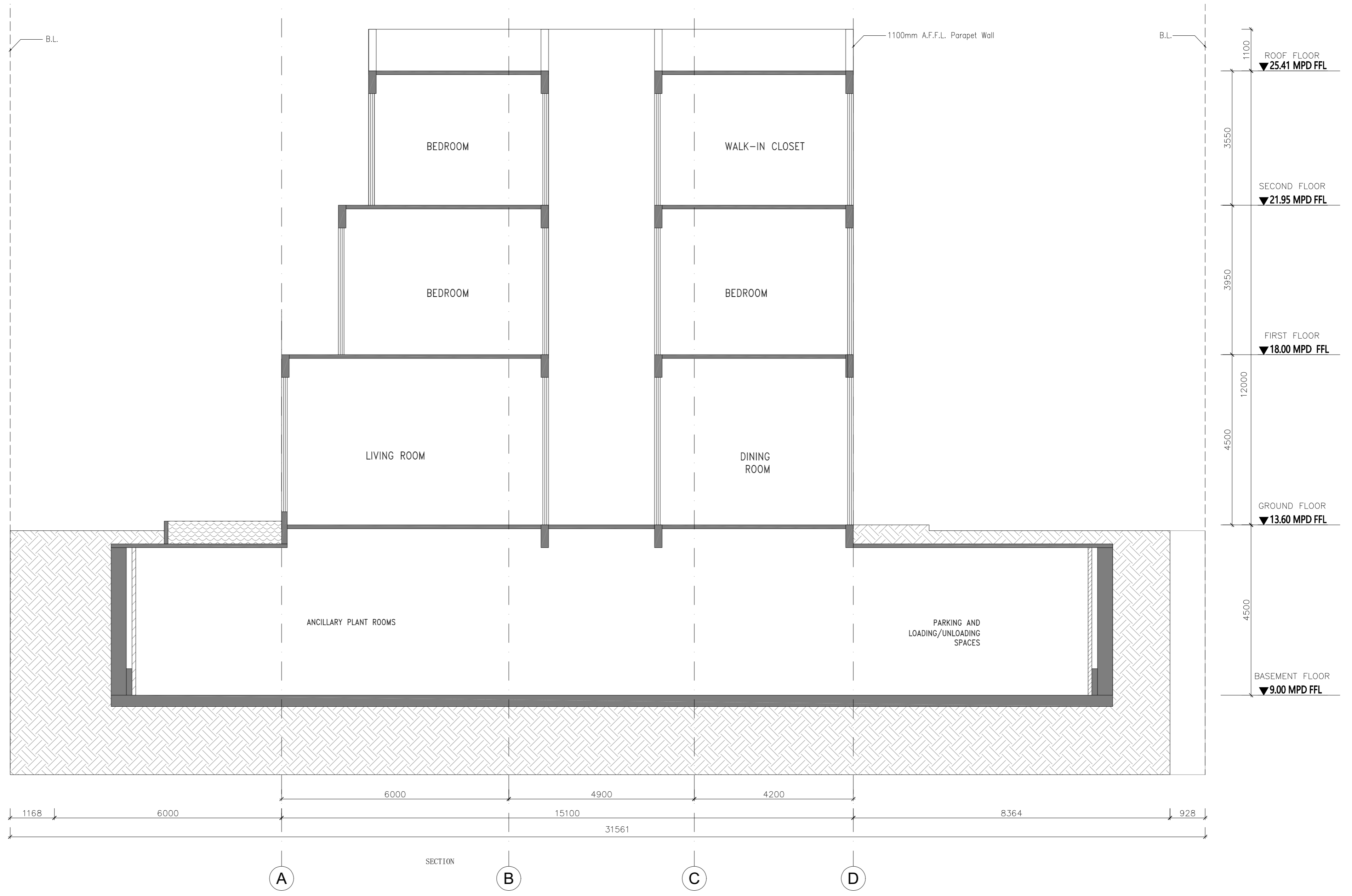
FIRST FLOOR



SECOND FLOOR



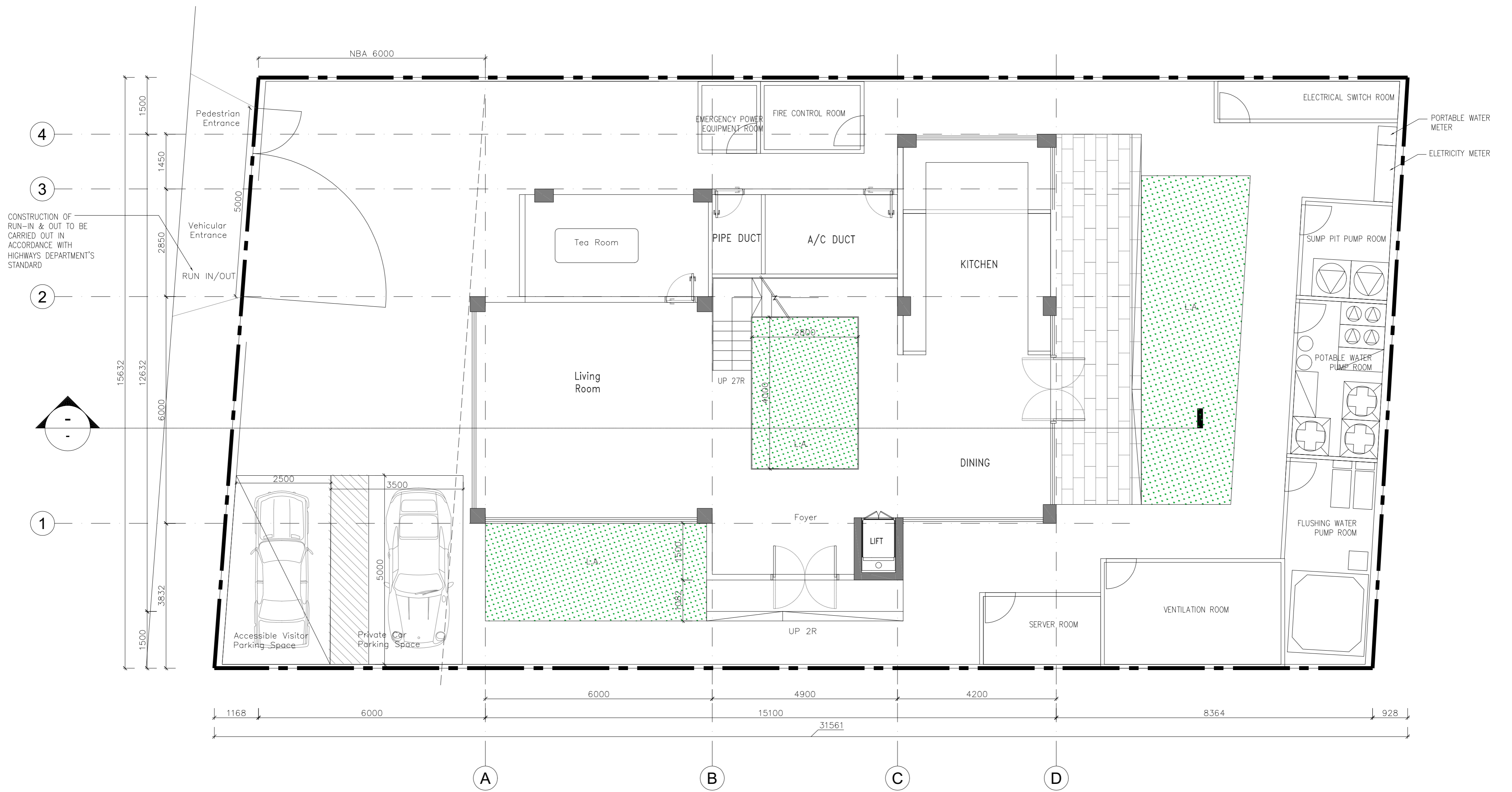
ROOF FLOOR



SECTION

APPENDIX 2

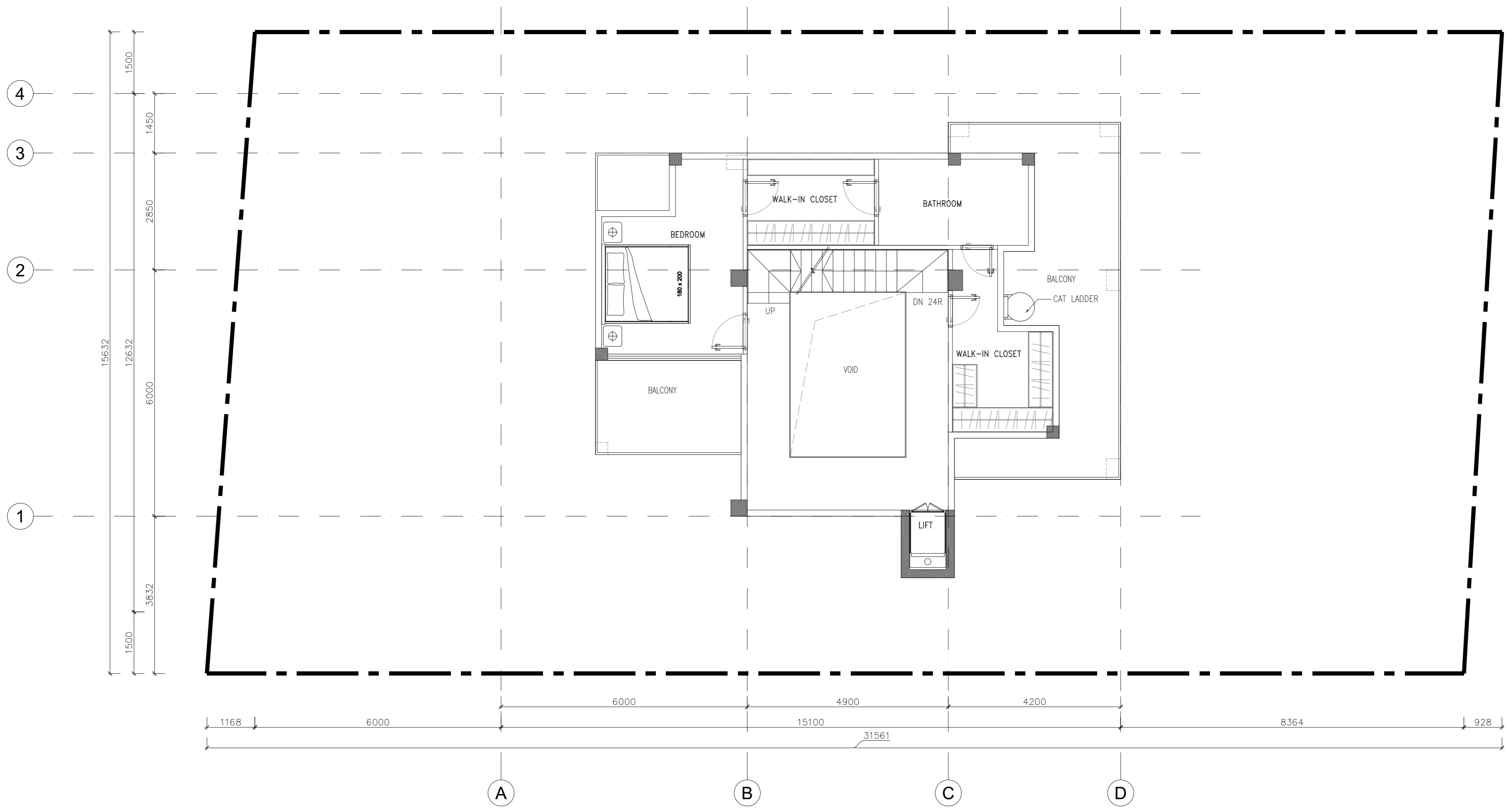
OZP-COMPLIANT SCHEME



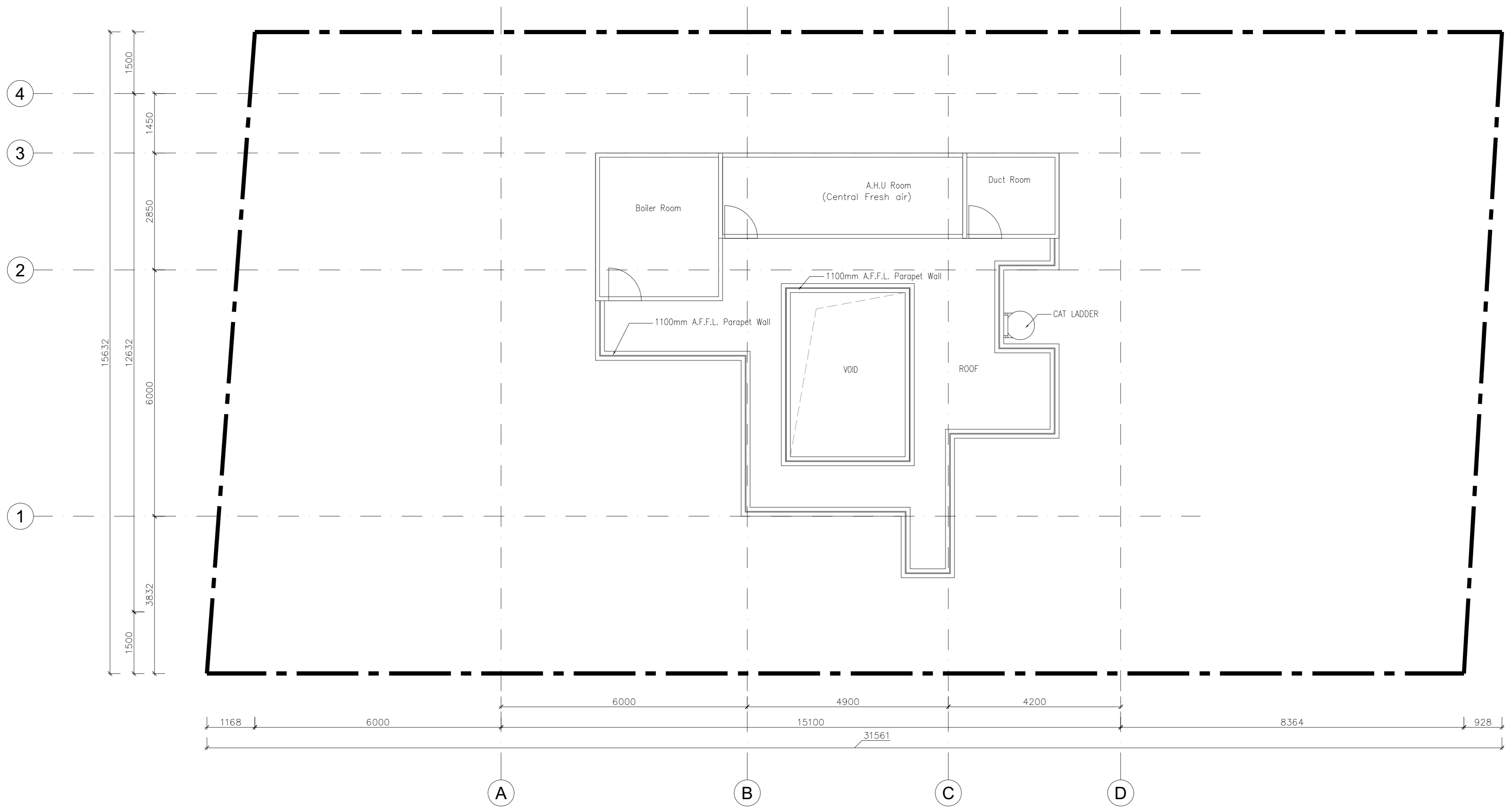
GROUND FLOOR



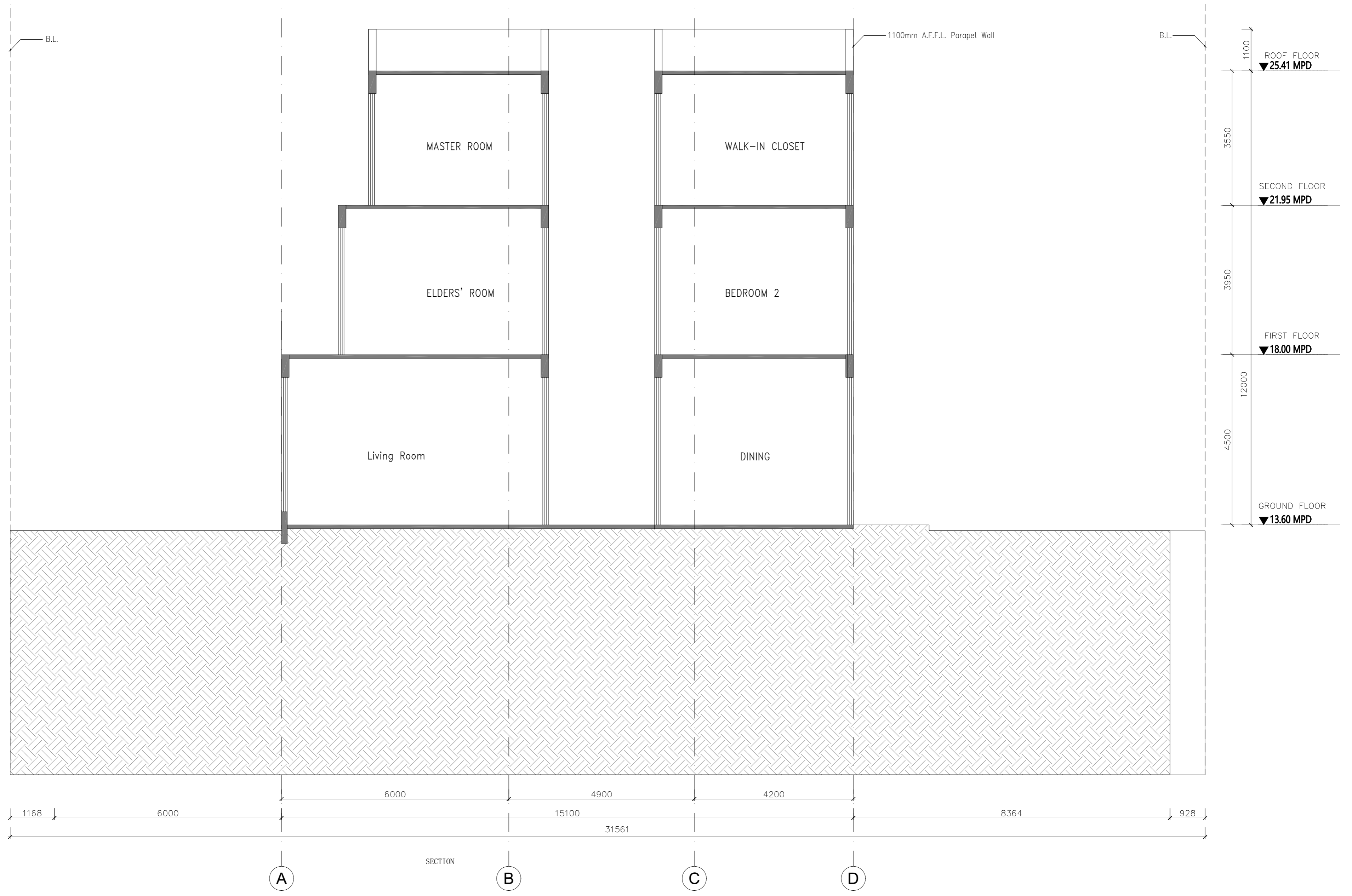
FIRST FLOOR



SECOND FLOOR



ROOF FLOOR



SECTION