

**By Hand and Email (tpbpd@pland.gov.hk)**

22 April 2025

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The Secretary  
Town Planning Board  
15/F, North Point Government Offices  
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Hong Kong

Your ref TPB/A/K22/43

Our ref 295879/50/WLL/PLML/CMCK/CZZL/05539

Dear Sir/Madam,

## **Application for Permission Under Section 16 of Town Planning Ordinance (Cap. 131)**

**Proposed Minor Relaxation of Plot Ratio (PR), Site Coverage (SC) and Building Height (BH) Restrictions for Permitted/Proposed Commercial Development, Public Transport Station and Underground Vehicle Tunnel at Kai Tak Area 4C Sites 4 and 5 and Adjoining Road Portion of Shing King Street; and Minor Relaxation of PR and BH Restrictions for Permitted Private Housing Development with Proposed Eating Place, Shop and Services and Social Welfare Facilities at Kai Tak Area 3E Sites 1 and 2 (Planning Application No. A/K22/43)**

## **Submission of Responses to Public Comments**

We refer to the captioned S16 Planning Application. We are pleased to submit herewith the Responses-to-Public Comments Table for your consideration.

Please note that this submission only serves as responses to public comments and has not involved changes in the scheme or findings of the technical assessments, thus should be exempted from the recounting requirement.

We sincerely seek the favourable consideration from the Town Planning Board to approve the captioned S16 Planning Application.

Our ref

295879/50/WLL/PLML/CMCK/CZZL/05539

Date

22 April 2025

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Should you have any queries, please contact the undersigned or Ms. Minnie Law at 2908 4151 ([minnie.law@arup.com](mailto:minnie.law@arup.com)).

Yours faithfully



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Enc - 4 copies of Responses-to-Public Comments Table

cc - Civil Engineering and Development Department

- Kowloon District Planning Office – Mr. FUNG Chi Man, Ernest ([ecmfung@pland.gov.hk](mailto:ecmfung@pland.gov.hk))

- Kowloon District Planning Office – Mr. YIP Kam Yee, Tony ([tkyyip@pland.gov.hk](mailto:tkyyip@pland.gov.hk))

S16 Planning Application for Proposed Minor Relaxation of Plot Ratio (PR), Site Coverage (SC) and Building Height (BH) Restrictions for Permitted/Proposed Commercial Development, Public Transport Station and Underground Vehicle Tunnel at Kai Tak Area 4C Sites 4 and 5 and Adjoining Road Portion of Shing King Street; and Minor Relaxation of PR and BH Restrictions for Permitted Private Housing Development with Proposed Eating Place, Shop and Services and Social Welfare Facilities at Kai Tak Area 3E Sites 1 and 2 (Planning Application No. A/K22/43)

Responses to Public Comments

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## PUBLIC COMMENTS

No.	Comments	Responses
1.	<p><b>Public Comments No. 1-104</b></p> <p><b>Building Height</b></p> <ul style="list-style-type: none"> <li>Some commenters have a view that the proposed heights will obstruct views of Victoria Harbour, diminishing public enjoyment of scenic landscapes. Comments suggest that the developments will lead to visual pollution and block sunlight, thus affecting the area's aesthetic appeal and livability.</li> </ul> <p><b>Development Intensity</b></p> <ul style="list-style-type: none"> <li>The increase in development intensity may strain local infrastructure, road network and public transport system.</li> </ul> <p><b>Environmental Impacts</b></p> <ul style="list-style-type: none"> <li>The future development will be surrounded by different noise pollution sources, making it unpleasant to live or work in. It will also be prone to the noise generated by the future GTS.</li> <li>Some commenters have a view that the increased building density would exacerbating pollution levels in the already congested area and worsen local air quality.</li> </ul>	<p>The Proposed Developments aligns with the Urban Design and Landscape Framework outlined in the Approved Kai Tak Outline Zoning Plan No. S/K22/8, creating a dynamic skyline compatible with the surroundings. Appropriate building separations and setbacks are adopted to enhance visual permeability.</p> <p>Visual Impact Assessment was conducted to confirm that the Proposed Developments aligns well with the surrounding built environment in terms of visual compatibility, building form, scale, and massing, particularly in relation to the Kai Tak Development.</p> <p>Traffic Impact Assessment, Sewerage Impact Assessment, Water Supply and Utilities Impact Assessment were conducted and the assessment results revealed that no insurmountable impacts to the surrounding area will be induced by the Proposed Developments.</p> <p>Environmental Assessment Study was conducted and the assessment results revealed that there are no insurmountable environmental impacts (including air quality and noise impacts) on the Proposed Developments.</p> <p>Results of the Air Ventilation Assessment showed that the air ventilation performance is similar to the Baseline Scenario (i.e. the OZP compliance Scheme) under both annual and summer conditions. This reveals that the</p>

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	<p><b>Air Ventilation</b></p> <ul style="list-style-type: none"> <li>There are concerns about how high-rise structures might hinder air circulation and contribute to heat island effects.</li> </ul> <p><b>Community Needs</b></p> <ul style="list-style-type: none"> <li>Several comments advocate for the creation of more public spaces and recreational areas instead of high-density commercial developments. This is viewed as essential for fostering community engagement and enhancing the quality of life for residents.</li> </ul>	<p>air ventilation will not be adversely affected by the Proposed Developments. With sufficient air circulation, adverse air quality impacts are not anticipated.</p> <p>The proposed Smart and Green Mass Transit System in Kai Tak (KTGTS), which operates using rubber tyres and is battery-powered, can provide a light and green feeder service and decrease the reliance on road transportation. This helps to reduce roadside emissions from traffic within the area. Moreover, the proposed KTGTS will implement appropriate environmental mitigation measures to minimise the potential environmental impacts, such as air quality and noise impacts, to the nearby environment in accordance with the Environmental Impact Assessment Ordinance.</p> <p>Air Ventilation Assessment was conducted and the results revealed that the air ventilation performance is similar to the Baseline Scenario (i.e. the OZP compliance Scheme) under both annual and summer conditions. This reveals that the air ventilation will not be adversely affected by the Proposed Developments.</p> <p>According to the Approved Kai Tak Outline Zoning Plan No. S/K22/8 (the OZP), the Application Site A is zoned as "Commercial (7)" and "Commercial (5)". These zones are intended for hotel and other commercial uses along the waterfront of the Runway Precinct so as to support the nearby Tourism Node and Cruise Terminal development. Please note that this application is made in accordance with the land use zonings</p>

Responses to Public Comments

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	<p><b>Visual Impact</b></p> <ul style="list-style-type: none"> <li>The increase in building height will cause visual pollution. The proposed development should be reviewed by the Harbourfront Commission to make sure it will not create negative impact on the scenic view of the harbourfront which is much cherished by locals and tourists.</li> </ul> <p><b>Traffic and Infrastructure</b></p> <ul style="list-style-type: none"> <li>Some comments highlight the existing traffic issues in the Kai Tak area and express concerns that new developments will exacerbate congestion. The anticipated increase in population density is expected to strain</li> </ul>	<p>stipulated in the OZP and does not involve any changes in land use zonings.</p> <p>Under this application, more retail spaces will be provided at Application Site A, fostering synergy with the waterfront promenade and reinforcing the role of the former Kai Tak runway area as a Tourism and Leisure Hub. Besides, the proposed KTGTS will provide a speedy and convenient alternative for public to reach the waterfront promenade at former runway tip for enjoyment.</p> <p>For Application Site B, this application enhances the residential development stipulated in the OZP by not only increasing the housing supply in the urban area but also providing additional retail spaces and social welfare facilities to serve the local community.</p> <p>Visual Impact Assessment was conducted to confirm that the Proposed Developments aligns well with the surrounding built environment in terms of visual compatibility, building form and scale, particularly in relation to the Kai Tak Development.</p> <p>The Task Force on Kai Tak Harbourfront Development of Harbourfront Commission has been consulted on the Notional Development Schemes of the Proposed Developments on 27 March 2025.</p> <p>The Proposed Developments are subject to the presence of KTGTS to provide infrastructural support for the anticipated traffic demand. It will provide a speedy travelling alternative for public. The Traffic Impact Assessment was conducted and the</p>

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	<p>local infrastructure, including roads and public transport systems.</p> <ul style="list-style-type: none"> <li>There is a serious concern about the insufficient ratio of residential parking spaces, which affects residents and the operation of nearby shopping malls.</li> </ul> <p><b>Market Demand</b></p> <ul style="list-style-type: none"> <li>Some commenters have a view that there is insufficient market demand for office and residential units given the current economic situation. The Proposed Developments should align with the market demand and position the area as Tourism and Leisure Hub.</li> </ul>	<p>assessment results revealed that no insurmountable traffic and transport impact will be induced by the Proposed Developments.</p> <p>The number of parking spaces for the Proposed Developments has adopted the high-end parking ratio specified in the Hong Kong Planning Standards and Guidelines (HKPSG). In addition, the KTGTS would further enhance the connectivity Kai Tak former runway area to the nearby railway network, which alleviates the parking demand.</p> <p>The application with an increase in non-domestic gross floor area at Application Site A serves to accommodate the public transport station (potential KTGTS's station and depot) to facilitate transit-oriented developments and increase the floor space for various commercial uses. The commercial developments at Application Site A can form a coherent cluster of office, hotel and retail developments with nearby developments, facilities and the planned Tourism Node to create synergy effect. This aligns with the planning intention and positioning of Kai Tak Development for creating a Tourism and Leisure Hub at the Kai Tak runway tip.</p> <p>Housing demand in the prominent urban area is still strong. The proposed relaxation can provide more supply of private residential units at Application Site B. The retail facilities can improve the experience of locals and visitors to the adjoining promenade, and planned public open space and the social welfare facilities can serve the local community.</p>

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	<p><b>Smart and Green Mass Transit System in Kai Tak</b></p> <ul style="list-style-type: none"> <li>Residents urge the government to prioritize transportation infrastructure improvements, particularly in relation to the proposed GTS. They emphasize that without effective transit solutions, the area will struggle to accommodate the projected population increase.</li> <li>There is concern about the resonance problem of the KTGTS.</li> </ul>	<p>The Government is now taking forward the KTGTS project in full swing and will review the viability of compressing the programme by adopting innovative approaches and construction methods. The Government targets to invite tender for the KTGTS project in second half of 2025 with an aim to award the contract in 2026 for commissioning in about 2031.</p> <p>The proposed KTGTS is a relatively light system. It operates with rubber tyres and is battery-powered to reduce noise and vibration. Therefore, the disturbance to the buildings nearby is minimal and the resonance problem is not anticipated.</p>

(Last Updated: 22 April 2025)