

**S16 PLANNING APPLICATION
APPROVED KAI TAK OUTLINE ZONING PLAN NO. S/K22/8**

**Proposed Composite Development (with Flat and Retail/F&B)
with Minor Relaxation of Plot Ratio Restriction
in “Commercial (2)” Zone at 8 Lam Chak Street, Kowloon**

Supporting Planning Statement

March 2026

Applicant:

Health Link Investment Limited

Consultancy Team:

KTA Planning Limited

DLN Architects Limited

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PLANNING LIMITED
規劃顧問有限公司

S3168_PS_V04



Executive Summary

This Planning Statement is prepared and submitted on behalf of Health Link Investment Limited (the "Applicant") to seek approval from the Town Planning Board ("TPB") under Section 16 of the Town Planning Ordinance for Proposed Minor Relaxation of Plot Ratio (PR) Restriction for Proposed Composite Development at 8 Lam Chak Street, Kowloon ("Application Site"/ "the Site"). The Application Site is currently occupied by the Harbourside HQ commercial building and is zoned "Commercial (2)" ("C(2)") on the Approved Kai Tak Outline Zoning Plan ("Approved OZP") No. S/K22/8.

In response to the Government's ongoing strategy to increase flat supply, the Applicant wishes to apply for Minor Relaxation of Plot Ratio (PR) for the Proposed Composite Development from 5.0 to 7.5. The scheme contains two blocks of 38-storey buildings (on top of two levels of underground carpark) with a building height that varies from about +110mPD to +136.45mPD (main roof level), respectively. Based on a site area of about 6,541 sq.m and a PR of about 7.0, a total GFA of not more than 45,787sq.m is proposed. Upon redevelopment, the Proposed Composite Development would exceed the permissible PR, and hence, a minor relaxation of PR restriction would be required.

The Proposed Minor Relaxation for the Proposed Composite Development is fully justified due to the following reasons:

- The Proposed Composite Development Responds to the Market Demand and is In-line with Government's Policies of Increasing Housing Supply
The Scale of Relaxation Sought is Acceptable and In Line with the Planned Development Intensity of the Area
- The Proposed Composite Development is Compatible with the Surrounding Planned Developments
The Proposed Development Scheme Adopted Design Strategies to Enhance Livability and Safety
- The Proposed Composite Development Provides Adequate Retail Floor Space to Meet Growing Demand and Contributes to the Development of Kai Tak
- The Proposed Development Scheme Complies with the Urban Design Concept for Kai Tak Development Area
- The Proposed Development Scheme Adopts the Harbour Vision Statement and Complies with the Harbour Planning Principles
- Various technical assessments have been carried out and the findings concluded that the Proposal is technically feasible without posing negative impact onto the surrounding environment and neither to the future residents.

Based on the above, the TPB is sincerely requested to give favourable consideration to this S16 Planning Application from planning and technical points of view.

行政摘要

(內文如有差異，應以英文版本為準)

本規劃申請是代表 Health Link Investment Limited (下稱「申請人」)，擬就城市規劃條例第 16 條向城市規劃委員會(下稱「城規會」)申請略為放寬地積比率限制，以容許在九龍臨澤街 8 號(下稱「申請地點」)作擬議住宅發展。申請地點現時為一幢商業建築物，位於啟德計劃大綱核准圖編號 S/K22/8 上被劃為「商業(2)」地帶。

申請人希望為擬議住宅發展申請將地積比率由 5.0 略為放寬至 7.0，以響應政府持續增加住宅供應的策略。擬議申請包括兩棟 38 層高的建築物(另設兩層地下停車場)，建築物高度分別為主水平基準上約 110 米和約 136.45 米(主屋頂水平)。擬議住宅發展將在約 6,541 平方米的地盤面積提供不超過 45,787 平方米的總樓面面積。由於擬議住宅發展將超出目前地積比率限制，因此申請略為放寬。

擬議申請略為放寬地積比限制作擬議住宅發展有充份理據支持的，其原因如下：

- 擬議發展回應市場需求，符合政府持續增加住宅供應的策略。
- 申請放寬的規模符合該區發展密度，可視為合適。
- 擬議住宅發展與周邊環境相容。
- 擬議發展採用設計策略以增強居住舒適度和安全性。
- 擬議發展項目符合啟德城市設計指引手冊理念
- 擬議發展項目採納了海港規劃理想，並遵從海港規劃原則
- 擬議發展已進行了各種技術評估，並證明不會對周圍環境產生負面影響。

根據以上各點，希望是次的規劃申請在規劃及技術層面上能獲得城規會支持。

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**S16 Planning Application
Approved Kai Tak OZP No. A/K22/8**

**Proposed Composite Development (with Flat and Retail/F&B)
with Minor Relaxation of Plot Ratio Restriction
in “Commercial (2)” Zone at 8 Lam Chak Street, Kowloon**

Supporting Planning Statement

1. INTRODUCTION

1.1 Purpose

1.1.1 This S16 Planning Application is prepared and submitted on behalf of Health Link Limited (the “Applicant”) to seek approval from the Town Planning Board (“TPB”) under Section 16 of the Town Planning Ordinance for the Proposed Minor Relaxation of Plot Ratio (PR) Restriction for the Proposed Composite Development (with Flat and Retail/F&B) at 8 Lam Chak Street, Kowloon (“Application Site”/ “the Site”) from 5.0 to 7.0. The Site falls within “Commercial (2)” (“C(2)”) zone on the Approved Kai Tak Outline Zoning Plan (“Approved OZP”) No. S/K22/8. This Planning Statement is to provide the TPB with the necessary information to facilitate consideration of this Planning Application.

1.2 Report Structure

1.2.1 Following this Introductory Section, the site and planning context will be briefly set out in Section 2. The Proposed Development Scheme is included in Section 3. The planning merits and justifications of the Proposed Composite Development are included in Section 4. Section 5 concludes and summarises this Supporting Planning Statement.

2. SITE AND PLANNING CONTEXT

2.1 Site Location and Existing Use

2.1.1 The Application Site, with an area of approximately 6,541m², is located at 8 Lam Chak Street, Kowloon (Figure 2.1). The Site is bounded by Cheung Yip Street to the northwest, Lam Chak Street to the southwest, and Kai Hing Road to the southeast. Harbourside HQ currently stands at the Site, mainly for commercial office use (**Figures 2.2a** and **2.2b** refer).

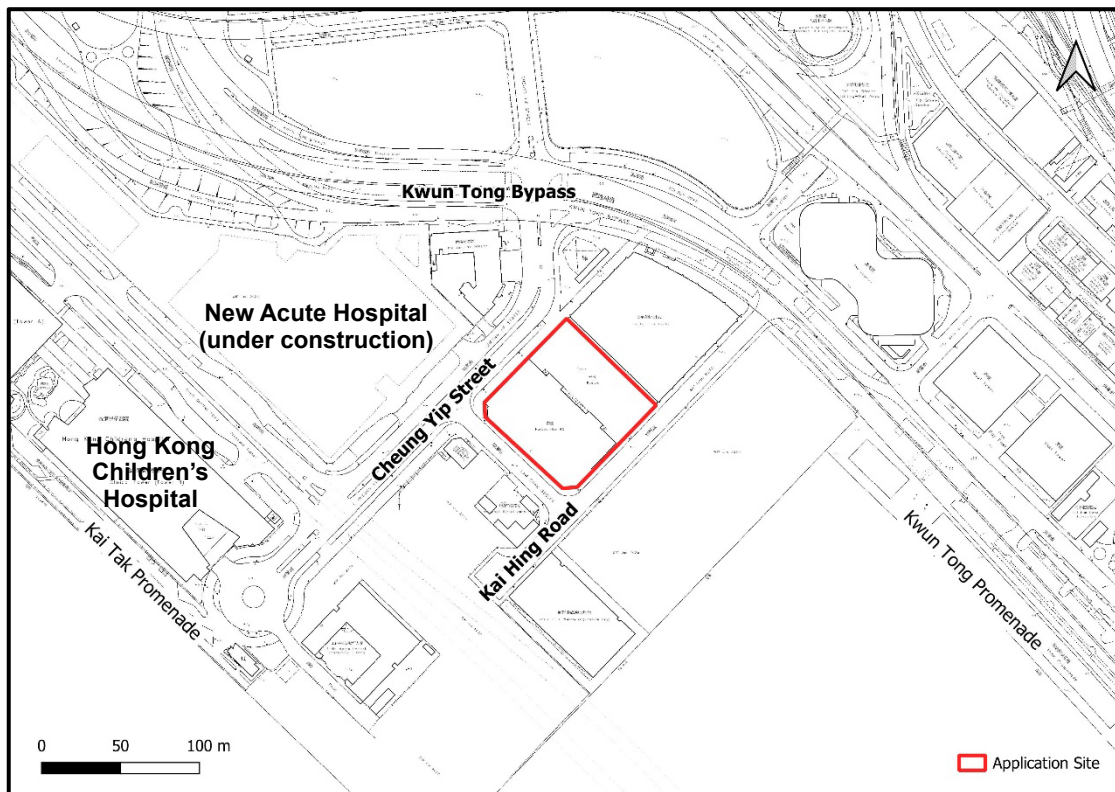


Figure 2.1 Site Location Plan



Figure 2.2a Site Photo (Viewing from Kwun Tong Promenade)



Figure 2.2b Site Photo (Viewing from southwest)

2.2 Land Status

2.2.1 The Site, also known as Lot NKIL 6215, has a registered area of about 6,541 m². (Lot Index Plan in **Figure 2.3** below refers). The Applicant is the sole registered owner.

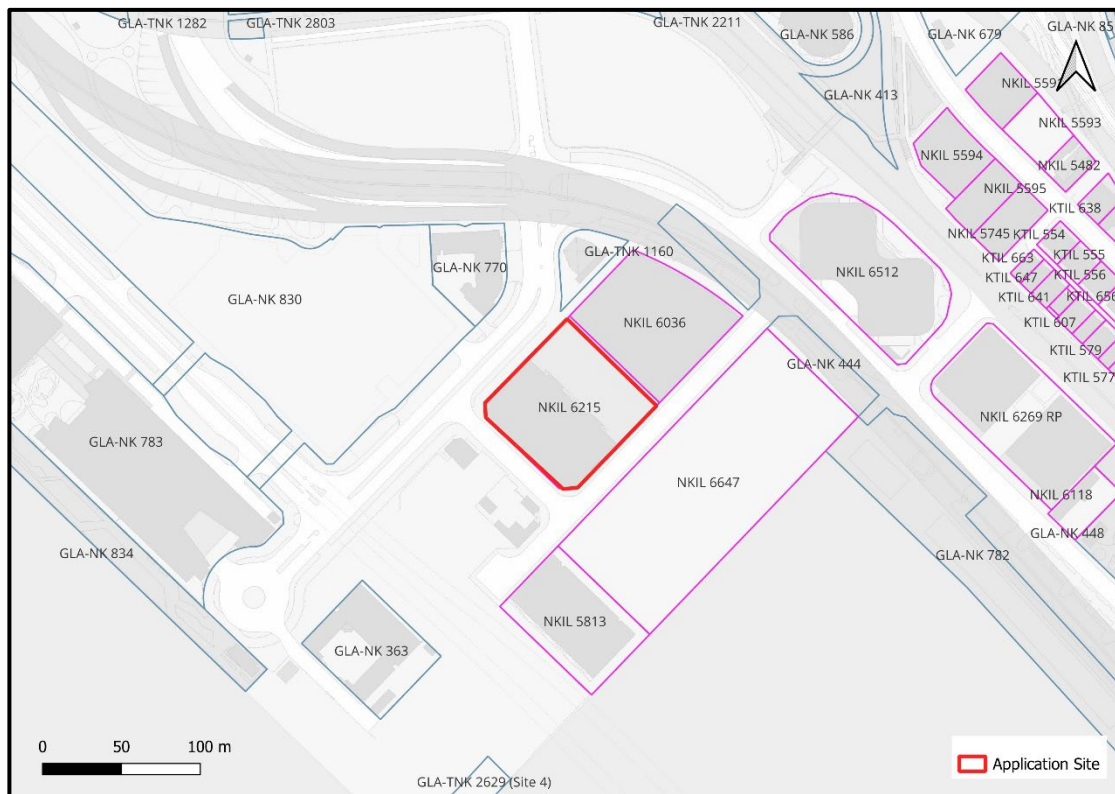


Figure 2.3 Lot Index Plan

2.3 Surrounding Land Use Pattern

2.3.1 The Site is located next to several planned and committed high-rise developments. Beyond the work-in-progress sites, the surrounding context would predominantly be comprised of high-rise developments and various GIC facilities (**Figure 2.4** refers). Details of the surrounding land uses are as follows:

- To the immediate northeast, adjoining the Site, is Pacific Trade Centre (at about +51.5mPD) which is currently occupied by warehouses and godown.
- To the east and southwest of the Site are some planned private residential developments under planning application nos. A/K22/31 (the Director of Planning subsequently approved the application No. A/K22/31-2 under s.16A of the Town Planning Ordinance for Class B amendments to the approved development proposal) and A/K22/43 respectively.

- To the further south of the Site across Kai Hing Road is Kerry D.G. Warehouse (Kowloon Bay). This is also subject to a planning approval for office development with shop and services and eating place uses (TPB Ref.: A/K22/27 refers), yet the approved scheme has not be realised and the approved application has lapsed.
- To the further northwest of the Site is the Hong Kong Children’s Hospital (at +60mPD) and the planned New Acute Hospital (at +100mPD) is located to the west across Cheung Yip Street.
- To the further south of the Site is a planned open space, which is connected by Kai Tak Promenade in the west and Kwun Tong Promenade in the east.
- To the north of Kwun Tong Bypass is Kowloon Bay Business Area and Kwun Tong Business Area with an array of high-rise commercial developments, including The Quayside (at around +100.2mPD), Manulife Tower (at around +100.6mPD) and Citi Tower (at around +100.6mPD). The planned Kowloon Bay Action Area, which will serve as a commercial hub with office, hotel, and retail facilities (at around +120mPD to +150mPD), is located in between the two business areas.

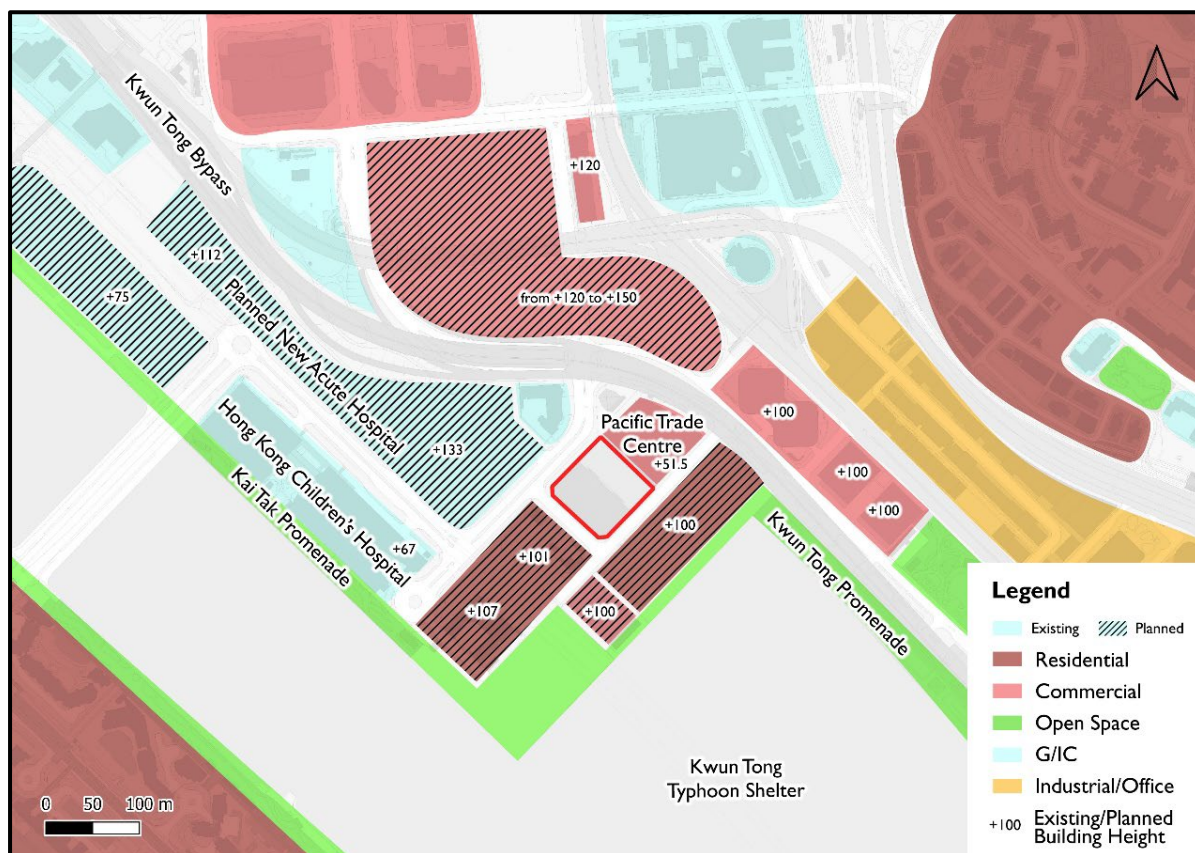


Figure 2.4 Surrounding Land Use

2.4 Accessibility of the Site

2.4.1 The Site abuts Cheung Yip Street, Lam Chak Street, and Kai Hing Road. The proposed vehicular run-in/out is located at Kai Hing Road. In terms of public transport modes, there are numerous road-based public transport services in the vicinity, including franchised buses and GMB. The Site is also reachable with a 15-minute walk from Ngau Tau Kok MTR Station.

2.5 Statutory and Non-statutory Planning Context and Site History

2.5.1 The Application Site falls within an area zoned “Commercial (2)” (“C(2)”) with a maximum plot ratio (“PR”) restriction of 5.0 for a domestic building or a building that is partly domestic and partly non-domestic, maximum site coverage restriction of 65% and maximum building height (“BH”) restriction of +100mPD, or that of the existing building, whichever is the greater, as stipulated on the Approved Kai Tak Outline Zoning Plan (“Approved OZP”) No. S/K22/8 (**Figure 2.5** refers).

2.5.2 According to the Statutory Notes of the Approved OZP, the planning intention of “C(2)” zone is as follows,

“This zone is intended primarily for commercial developments, which may include uses such as office, shop, services, place of entertainment, eating place and hotel, functioning as territorial business/financial centre and regional or district commercial/shopping centre. These areas are usually major employment nodes.”

2.5.3 According to the Statutory Notes of the Approved OZP for the “C(2)” zone, ‘Flat’ is a Column 2 use which requires permission from the Town Planning Board. Whilst the building height (+136.45mPD) and site coverage (94.906% up to 17.35m) of the existing building are both greater than the restrictions stipulated on the Approved OZP, seeking minor relaxation of Building Height and Site Coverage Restrictions are deemed not necessary.

2.5.4 According to the Explanatory Statement of the Approved OZP, podium development is discouraged to enhance air ventilation and encourage interaction in the community.

Proposed Composite Development (with Flat and Retail/F&B)
with Minor Relaxation of Plot Ratio Restriction in "Commercial (2)" Zone at 8 Lam Chak Street, Kowloon
S16 Planning Application

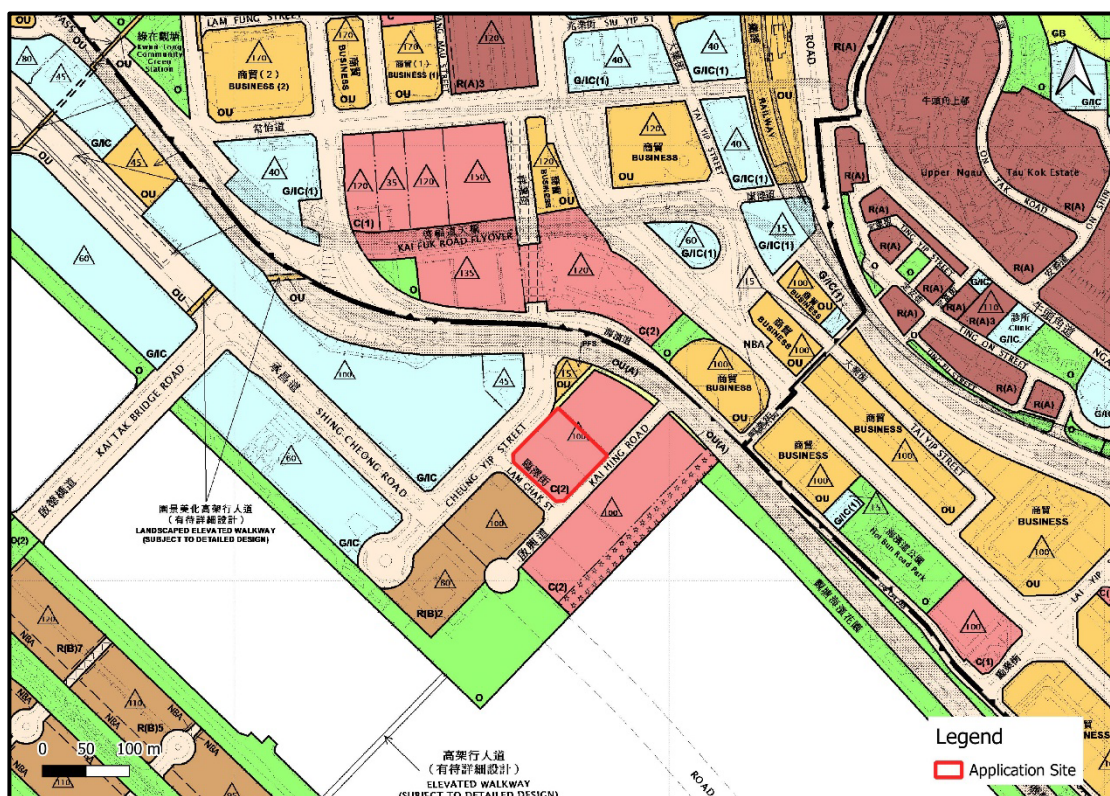


Figure 2.5 Zoning Context Plan

2.5.5 The Site was the subject of 1 previous approved planning application (No. A/K22/6) for Minor Relaxation of Building Height, Plot Ratio and Site Coverage Restrictions for Permitted Commercial Development. The application was approved by the Metro Planning Committee on 21.11.2008. Details of the above are shown in Table 2.1.

Table 2.1 Previous Planning Application

Application No.	A/K22/6
Location	Junction of Cheung Yip Street and Lam Chak Street, Kowloon Bay (NKIL No. 6215)
Site Area	About 6,541 m ²
Applied uses	Proposed Minor Relaxation of Building Height, Plot Ratio and Site Coverage Restrictions for permitted Commercial Development
Zoning	"Commercial (2)"
Proposed Non-domestic PR	9.66
Proposed Non-domestic GFA	About 63,186 m ²
Proposed BH	136.45mPD
Proposed No. of Storeys	30 storeys (including 2 basement levels)
Decision (Date)	Approved with conditions (21.11.2008)

2.5.6 The existing building at the Site was constructed with reference to the approved development parameters of the aforementioned S16 Planning Application at a plot ratio of about 9.66 and at a maximum building height of 136.45mPD.

2.6 Government’s Ongoing Strategy to Increase Flat Supply

2.6.1 The Government has placed a strong emphasis on increasing the supply of housing land in recent years to address the housing and land shortage problems. In response to societal concerns, the Government initiated various fiscal measures aimed at freezing the property boom and proposed a series of measures to increase housing supply in the short, medium, and long term.

Long Term Housing Strategy

2.6.2 The Long Term Housing Strategy (“LTHS”) was first released by the Transport and Housing Bureau on 16 December 2014 to address the structural issues pertaining to Hong Kong’s housing problem, and is being updated annually to make timely adjustments accordingly. According to the latest Annual Progress Report released in October 2024, the total housing supply target for the ten-year period from 2025-26 to 2034-35 is 440,000 units, comprising 308,000 units of public housing supply and 132,000 units of private housing supply. The Government will make available land over the next five years to provide about 80,000 private housing units.

Policy Address

2.6.3 In the Policy Address 2024, the Chief Executive announced that the Government remains determined to sustain efforts in land production. The Government will assess the situation and take forward various projects in a steady and paced manner. The Government will take into account the latest market changes when disposing of land, ensuring a stable and healthy development of the market.

2.7 Increasing Office Vacancy in Kwun Tong

2.7.1 According to Hong Kong Property Review 2025 published by the Rating and Valuation Department, as of end of 2024, the vacancy rate for private commercial properties in the Kwun Tong district stood at 22.1%, which was significantly higher than the overall territorial vacancy rate of 16.36%. The report also revealed that the overall vacancy rate in Hong Kong has been rising steadily from 11.5% in 2020. These indicate that the supply of commercial floorspace in Kwun Tong is currently more than sufficient to meet the market demand.

2.7.2 Furthermore, the 2025-26 Budget has acknowledged that considerable challenges faced by the commercial property market in recent years have led to persistently high vacancy rates. In light of the high office vacancy rates, the Government considers providing greater flexibility in the land use of commercial sites and rezoning some commercial sites for residential use.

2.8 Urban Design Framework for Kai Tak Development

2.8.1 As outlined in Paragraph 7.2 of the Explanatory Statement of the Approved OZP, Kai Tak Development is planned with six sub-districts, including Kai Tak City Centre, Sports Hub, Metro Park, Runway Precinct, Tourism and Leisure Hub and South Apron Corner. A further hierarchy of primary, secondary and tertiary activity nodes is also outlined. (**Figure 2.6** refers).

2.8.2 The activity nodes are described as critical to revitalise the district. Large-scale anchors of regional significance include the Sports Park, Cruise Terminal and Station Square. The Site is located at an identified secondary node of Kowloon Bay Square, which is highly connected to the runway portion of the Kai Tak Development via a pedestrian footbridge, which leads to the primary nodes of the Cruise Terminal and Kai Tak Sky Garden, respectively.

2.8.3 The waterfront development of Kai Tak has also been greatly emphasised. To bring life and vibrancy to the waterfront, it is necessary to introduce a variety of activities, ranging from casual strolls along a natural waterfront park to a highly active, commercial and retail-oriented waterfront lined with restaurants, cafes, and bars. Located near both the Kai Tak and Kwun Tong Promenade, the Site plays a pivotal role in shaping the waterfront experience of the area.

2.8.4 The following key urban design and landscape principles have been identified and adopted under the proposed Kai Tak Urban Design Framework:

Connecting the Neighbourhood: Connecting the surrounding neighbourhoods to Kai Tak is critical to the success of this redevelopment effort. Easy access for vehicles and pedestrians between the surrounding districts will help revitalise and reactivate East Kowloon area.

Creating Nodes: It is critical to create strong regional and local nodes within Kai Tak to revitalise the district. Large-scale anchors of regional significance include the Sports Park, Cruise Terminal, Metro Park and commercial/office centres. Community facilities and neighbourhood parks would contribute as local nodes.

Activating the Harbour-front: To bring life and vibrancy to the waterfront, it is necessary to introduce a variety of activities ranging from casual strolls along a natural waterfront park, to a highly active commercial and retail-oriented waterfront lined with restaurants, cafes and bars.

Creating a Pedestrian Friendly Environment: The “podium-free” design concept would enhance air ventilation and view corridor in the street environment. The pedestrian experience is enhanced through the continuous waterfront promenade and a heritage trail winding through and connecting the Metro Park with Sung Wong Toi Park and other neighbouring districts and open spaces.

Creating a Dynamic Skyline: With a composition of neighbourhoods of different scales, diverse building types, varying building heights, and selective signature towers, a dynamic skyline will undoubtedly grace the face of Kai Tak. The overall building height profile starts with a landmark tower with distinctive design on the “CDA(1)” site at the Kai Tak River in the Kai Tak City Centre and gradates towards the waterfront in two directions; one in the southeast along the Kai Tak River towards the South Apron Corner and the other in the south along the residential neighbourhoods towards the Sports Park to the Metro Park and the Ma Tau Kok waterfront area. It then rises again from the Runway Precinct to another landmark development at the Tourism Node.

Celebrating the Views: Views beyond the neighbourhoods are absolutely critical to maintain one’s orientation within the city. There is a strong emphasis on views to and from the mountains (i.e. Lion Rock and Fei Ngo Shan), the harbour (i.e. Victoria Harbour and Lei Yue Mun), and the city beyond (i.e. Hong Kong Island and Kowloon hinterland). The former airport runway itself is also a feature of historical interest. The elongated shape of the ex-runway is retained under the ‘no reclamation’ approach. The vista extending from the Metro Park, the Central Boulevard, Tourism Node and Runway Park to Lei Yue Mun will be maintained to recap the flight take-off memory.

Celebrating the Gateways: Gateways can take a variety of forms and types in Kai Tak. From the Harbour, the Cruise Terminal will be the main point of entry, while the Metro Park and the Sports Park will be the visual gateway from the water into Kai Tak. From the underground railway station, the Station Square, which is full of trees and green open space, will be the point of arrival. By foot, several gateways from each neighbourhood will take the form of bridges, walkways and buildings. By car, feature streetscapes, landscapes and visual markers signify the gateway into Kai Tak.

Creating “A Green Web for Sustainable Development”: The landscape design of “A Green Web for Sustainable Development” aims to create a hierarchical landscape network of parks, gardens, civic squares and waterfront for integrating the residential and commercial neighbourhoods. Through the “Stadium in the Park” concept (i.e. the integration of Metro Park with open spaces around the Sports Park and Station Square), a continuum of interconnected green spaces within Kai Tak and its adjoining districts, an extensive framework of tree and shrub planting, and a heritage trail winding through and connecting the Metro Park with Sung Wong Toi Park, the landscape design will place a strong emphasis on aesthetics, human comfort and creating a sense of place. All development sites should have greening at both pedestrian zone and roof level.

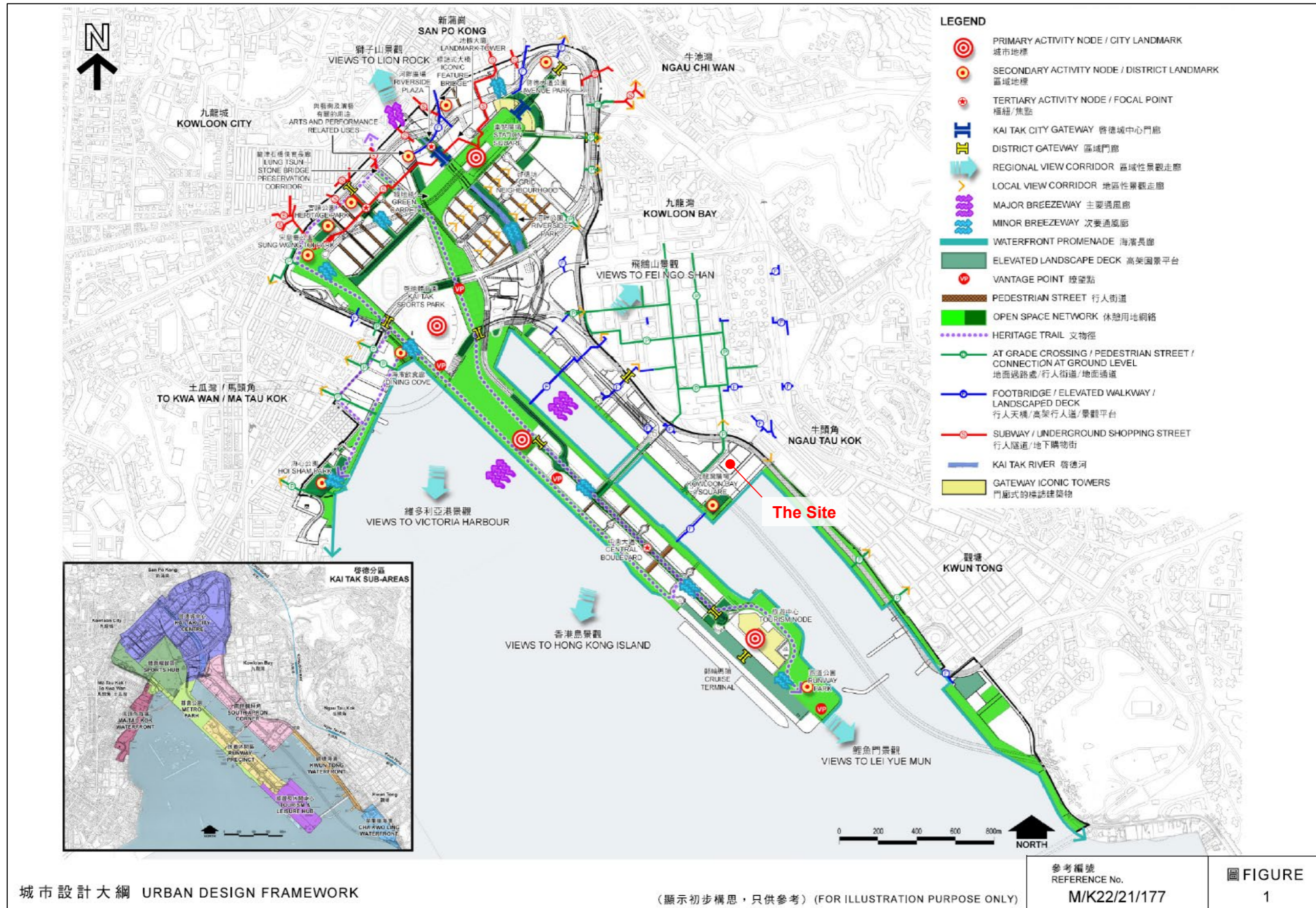


Figure 2.6 Urban Design Framework of Kai Tak Development (Extracted from Approved Kai Tak OZP No. S/K22/8)

2.8.5 The Kai Tak Development Urban Design Guidelines and Manual ("UDGMs") sets out a design framework and approach that will circumscribe the broad form, arrangement, massing and appearance of development within the Kai Tak Development for five main categories of development, including the Grid Neighbourhood ("GN"), The Runway Precinct ("RP"), Domestic Sites (other than GN and RP), Private Non-Domestic Sites (other than GN and RP) and Government, Institution or Community Sites. The UDGMs set out a design framework and approach that could broadly guide the broad form arrangement, massing and appearance of the developments to align with the eight urban design and landscape principles as set out in the Kai Tak OZP.

2.8.6 The Application Site is located at the South Apron Corner as stipulated on the UDGMs. Location-based recommendations from the Private Non-Domestic Sites UDGMs and use-specific recommendations from the Private Domestic Sites UDGMs would serve as a broad guide in devising the Proposed Development Scheme at the Site.

2.8.7 The main recommendations and guidelines from the UDGMs are highlighted as follows:

Streetscape: Safe pedestrian circulation should be provided with free open access to retail frontages and encourage free movement along and across streets. The paving and street furniture along the pedestrian circulation should provide visual interest and complement the character of the area or the adjacent developments.

Façade: Continuity in the appearance and quality of façade treatments should be ensured. Durable modern low maintenance materials are also encouraged while adopting appropriate colour tones as recommended by the Kai Tak Developments Public Creatives Study.

Massing: According to the UDGMs, podium development within the Site is discouraged to enhance air ventilation and encourage interaction in the community.

Building Performances: Dual-pane insulating glazing is recommended for its acoustic performance and energy efficiency. Referring to Sites 3E1 and 3E2 southwest of the Site, currently subject to a planned Private Housing Development with Proposed Eating Place, Shop and Services and Social Welfare Facilities, acoustic windows and balconies, along with noise impact assessments, are recommended by the UDGMs.

At-grade Frontage: Shading provided by buildings to pedestrians at-grade is critical in a humid city like Hong Kong. Natural shading through trees and architectural canopies is recommended to provide shade. Largely transparent façades, with consideration of the human scale, are also recommended, such that retail, community or other non-residential uses can promote streetscape activity. This is critical in promoting pedestrian interest and ensuring a quality environment.

Greening: The greening and landscape design within Kai Tak has a vision of establishing the district as a world-class destination and a lively and attractive place to visit. Therefore, major contribution in the Site to the greening continuity within the street network is recommended. Greening requirements are stipulated in both HKPSG and PNAP APP-152, and the UDGMs have further recommended control parameters as follows:

- Greening shall be provided within the 3 metres building setback within each Site where the retail belt abuts pedestrian streets; and
- The overall minimum greening ratio shall be 30% of the site area. The greening ratio within the pedestrian zone shall be equivalent to 20% of the site area and the greening ratio at roof level shall be equivalent to 20% of the roof area.

2.9 Harbour Planning Principles

2.9.1 As part of the Harbour Plan Review, the Harbour-front Enhancement Committee ("HEC") Sub-committee on Harbour Plan Review formulated a set of Harbour Planning Principles ("HPP"). The Principles include Vision and Mission Statements that serve as guidelines for all individuals and organisations to facilitate sustainable planning, preservation, development and management of Victoria Harbour and the harbour-front areas. The HPP are listed below:

Preserving Victoria Harbour: Victoria Harbour must be protected and preserved for Hong Kong people and visitors as a special public asset, a natural and cultural heritage asset, and a driver for the creation of economic and social values.

Stakeholder Engagement: All sectors of the community must be engaged at an early stage and on an on-going basis in the planning, development and management of Victoria Harbour and its harbour-front areas through transparent and inclusive consensus building processes.

Sustainable Development: The planning, development and management of Victoria Harbour and its harbour-front areas should embrace the principles of sustainable development to balance and cater for the economic, social and environmental needs of all sectors of the present generation, without compromising the needs of future generations.

Integrated Planning: Integrated and long-term planning, development and management of infrastructure, land and marine uses, and water quality is essential to ensure that Victoria Harbour and its harbour-front areas support and enhance the economic, environmental and social aspirations of Hong Kong.

Proactive Harbour Enhancement: The planning, development and management of Victoria Harbour must proactively enhance the harbour and its harbour-front areas as Hong Kong’s symbol of urban design excellence and Hong Kong’s brand identity to the international community.

Vibrant Harbour: It is essential to balance the use of the harbour to provide both a maritime and logistics hub for the safe and efficient passage of people and goods, and as a cultural and leisure facility. Both marine and land-side activities must cater to and balance with the aspirations of all sectors of the community.

Accessible Harbour: Victoria Harbour must integrate with the hinterland in a comprehensive manner, including ample unrestricted and convenient visual and physical access for pedestrians, preferably at grade, to and along the Harbour as well as the harbour-front areas.

Public Enjoyment: The planning, development and management of Victoria Harbour and its harbour-front areas should maximise opportunities for public enjoyment. Land required for and the impact from infrastructure developments, utility installations, and land uses incompatible with the harbour planning principles should be minimised.

2.10 Planning History of Kai Tak

2.10.1 A total of nine sites are zoned “Commercial” on the Approved OZP, making up about 12.90 ha of land. As further explained in the Explanatory Statement of the Approved OZP, the area is primarily intended for commercial developments, which may include uses such as office, shop, services, place of entertainment, eating place and hotel, functioning as a territorial business/financial centre and regional or district commercial/shopping centre. These areas are usually major employment nodes.

2.10.2 Although the Site has remained “C(2)” since the Draft OZP No. S/K22/1, the adjacent parcel of land southwest of the Site has been rezoned to “Residential (Group B)” (“R(B)”) on the Draft OZP No. S/K22/5 by the Government in February 2017 (Amendment Item N1 in **Figure 2.8** refers). The target of the rezoning exercise was to form a residential cluster at the South Apron Corner together with

the proposed comprehensive redevelopment of Kerry Godown and Kowloon Godown for residential use (section 3.3(b) of TPB Paper No. 10236 refers).

Proposed Composite Development (with Flat and Retail/F&B)
 with Minor Relaxation of Plot Ratio Restriction in "Commercial (2)" Zone at 8 Lam Chak Street, Kowloon
 S16 Planning Application

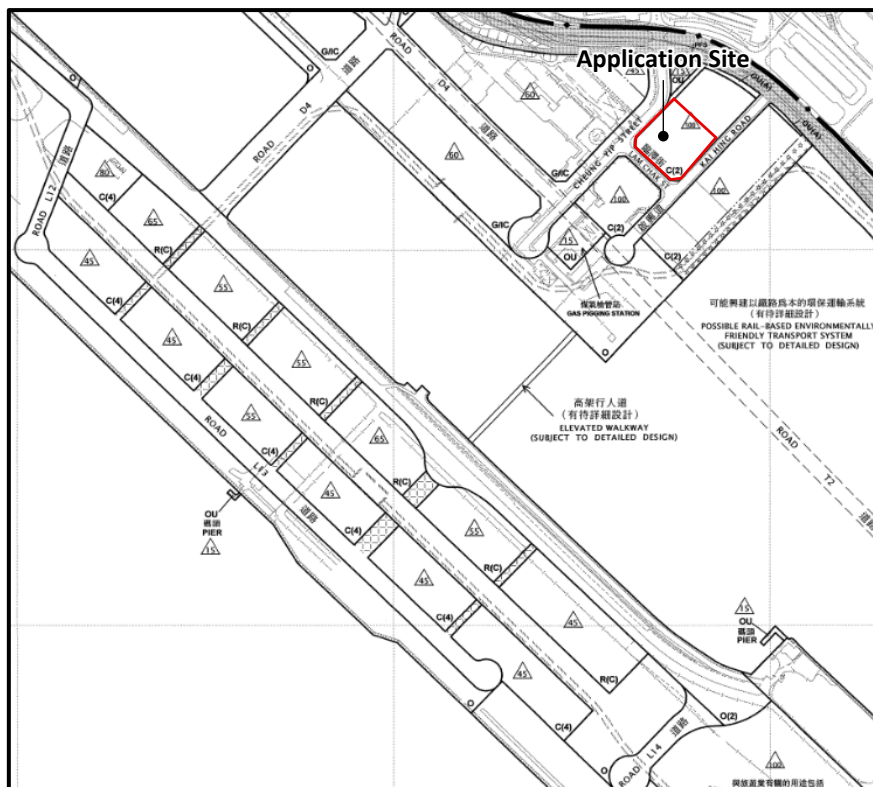


Figure 2.7 Excerpt from Draft Kai Tak OZP No. S/K22/1

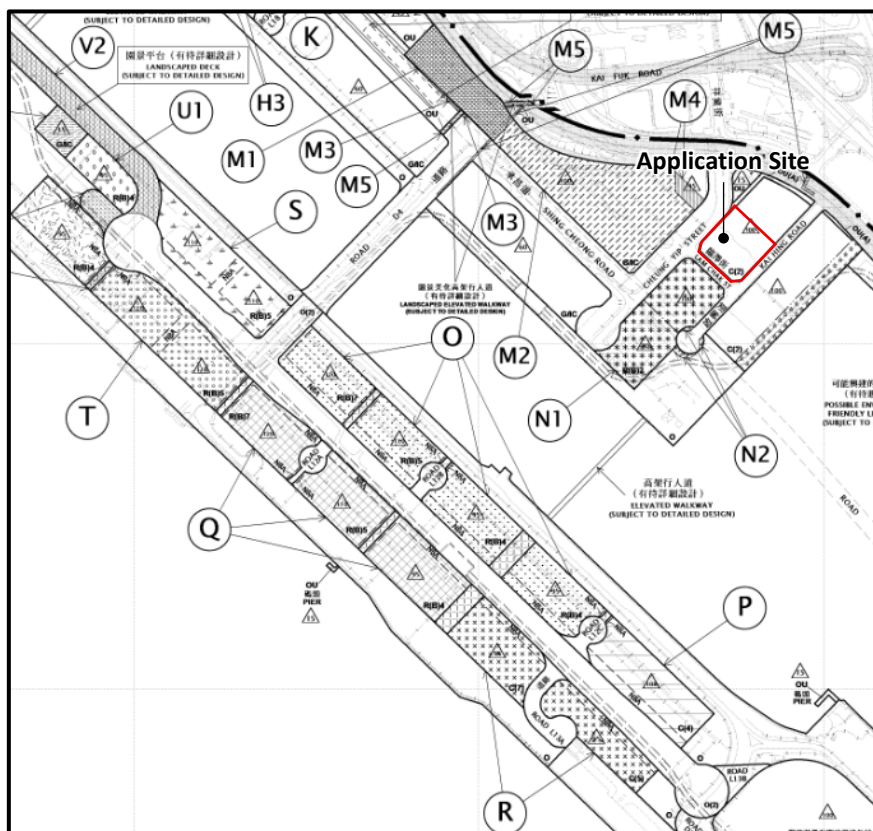


Figure 2.8 Excerpt from Draft Kai Tak OZP No. S/K22/5

3. THE PROPOSED DEVELOPMENT SCHEME

3.1 The Proposed Development Scheme

3.1.1 Schematic drawings for the Proposed Composite Development are presented in **Appendix 1** of this Supporting Planning Statement. The Site of an area of about 6,541m² yields a total GFA of approximately 45,787m² at PR 7.0 to produce a total of 1,140 residential units. The Proposed Composite Development comprises two residential towers with a building height of 34 domestic floors (max., excluding 1 refuge floor), over one storey of recreational facilities, two storeys of retail/F&B floors and two storeys of underground carpark. The proposed max. building height maintains at +136.45mPD (main roof level).

3.1.2 Major development parameters and proposed floor uses of the Proposed Composite Development are summarised in **Table 3.1** and **Table 3.2**, respectively.

Table 3.1 Key Development Parameters

Proposed Development Scheme			
Major Development Parameters			
Total Site Area	About 6,541m ²		
Plot Ratio	Total: 7.0 Domestic: 6.5 Non-domestic: 0.5		
Total GFA	Total: 45,787m ² Domestic: 42,516.5m ² Non-domestic: 3,270.5m ²		
No. of Unit	1,140		
Average Flat Size	About 37.3m ²		
Maximum Building Height	Not more than +136.45mPD		
No. of Storeys	Not more than 38 (plus 2 storeys of underground carpark)		
Site Coverage	15m and below: Not more than 75% Above 15m: Not more than 40%		
No. of Block	2		
Private Open Space	Not less than 2,850m ²		
Internal Transport Provisions			
	Residential	Non-residential	Total
Car Parking Space	241	22	263
Motorcycle Parking Space	12	3	15
Loading/Unloading Space	2 HGV	3 LGV + 2 HGV	3 LGV + 4 HGV

Table 3.2 Proposed Floor Uses

Tower 1B & 2B		Tower 1A & 2A	
Floor	Proposed Uses	Floor	Proposed Uses
21-29/F	Residential Units	21-37/F	Residential Units
20/F	Refuge Floor		
3-19/F	Residential Units		
2/F	Landscape Area & Recreational Facilities		
G-1/F	Retail/ F&B Facilities and E&M		
B1-B2/F	Carpark and E&M		

3.2 Key Design Considerations

3.2.1 In formulating the Proposed Development Scheme, the schematic design has taken into account site constraints (e.g. setback from the LPG filling station and noise) as well as design considerations to ensure the Proposed Composite Development creates a high-quality development in harmony with the surrounding environment and with the planning themes of Kai Tak Development. The Proposed Development Scheme has incorporated the following design considerations:

Provision of Building Setback along Lam Chak Street and Kai Hing Road

3.2.2 As a planning gain, the Proposed Development Scheme provides a low-level setback of about 2.5m on Kai Hing Road and a 2.5m setback on Lam Chak Street. These setbacks would allow more space along the footpath on Kai Hing Road and Lam Chak Street (to about 4.4m). The more spacious pedestrian walkway would enhance the walking experience along the Site, aligning with the principles of pedestrian-friendliness and accessibility set out in the Kai Tak UDGMs and HPPs.

Adopting a Varying Building Height Design

3.2.3 The maximum building height of the Proposed Composite Development remains not more than +136.45mPD, which is consistent with the height of the existing building at the Site. To give visual interest to the skyline, the Proposed Development Scheme has adopted a varying building height profile. Tower 1B & 2B would appear distinctively lower than Tower 1A & 2A, varying from 110mPD to 136.45mPD.

Provision of a 15m Setback

3.2.4 A 15m building setback has been proposed between the Proposed Composite Development and the site boundary abutting Pacific Trade Centre. In line with this, the footprint of the two-storey retail space has been minimised. Coupled with the building setbacks along Lam Chak Street and Kai Hing Road, the proposed site coverage has been kept to an acceptable level, balancing the provision of retail facilities with good wind penetration at pedestrian street level.

LPG Filling Station Buffer

3.2.5 Considering the safety of the future residents, and with reference to the HKPSG, residential towers have been positioned away from the 55m radius buffer from the nearby LPG Filling Station.

3.3 Landscape Design Considerations

3.3.1 The landscape design aims to respond to the site conditions, building form, and function and to provide a high-quality landscape scheme that would improve the overall site character for the proposed building blocks. The main factors to be taken into consideration are:

- Response to the site context, both in terms of landscape character and visual amenity;
- Supplement to the proposed building and its architectural style;
- Creation of a green and sustainable setting by maximising the opportunity for soft landscape;
- Improve the existing streetscape;
- Establishment of pleasant landscape areas which meet the varying needs of users; and
- Minimization of future maintenance requirements.

3.3.2 A green boulevard has been proposed at the main entrance at G/F to create a welcoming and aesthetically pleasing approach that guides residents and visitors toward the residential lobby. Directly opposite the residential lobby, a water feature is situated at the drop-off area. This feature not only enhances the visual appeal of the entrance but also provides a calming focal point, creating a strong sense of arrival and orientation for occupants and visitors. The design of these spaces aims to promote relaxation, social interaction, and a high-quality building environment.

3.3.3 Communal open space of not less than 2,850m² will be provided on G/F to 2/F to serve the future residents at a ratio of not less than 1m² per person. The majority of open spaces at 2/F would be designed to foster social interaction and recreational activities. A range of recreational facilities are proposed within these

areas, including a swimming pool, sitting gardens, multi-functional lawn, a gathering courtyard, and fitness trails

3.4 Access and Provision of Internal Transport Facilities

3.4.1 The vehicular run-in/out point will continue to be located on Kai Hing Road.

3.4.2 Internal transport facilities, including private car parking spaces, loading/unloading bays and visitor car parking spaces, will be provided in compliance with the Hong Kong Planning Standards and Guidelines. The car park will be in a form of underground car park. Details of the internal transport provision are summarised in **Table 3.1** above and in **Appendix III**.

4. PLANNING MERITS AND JUSTIFICATIONS

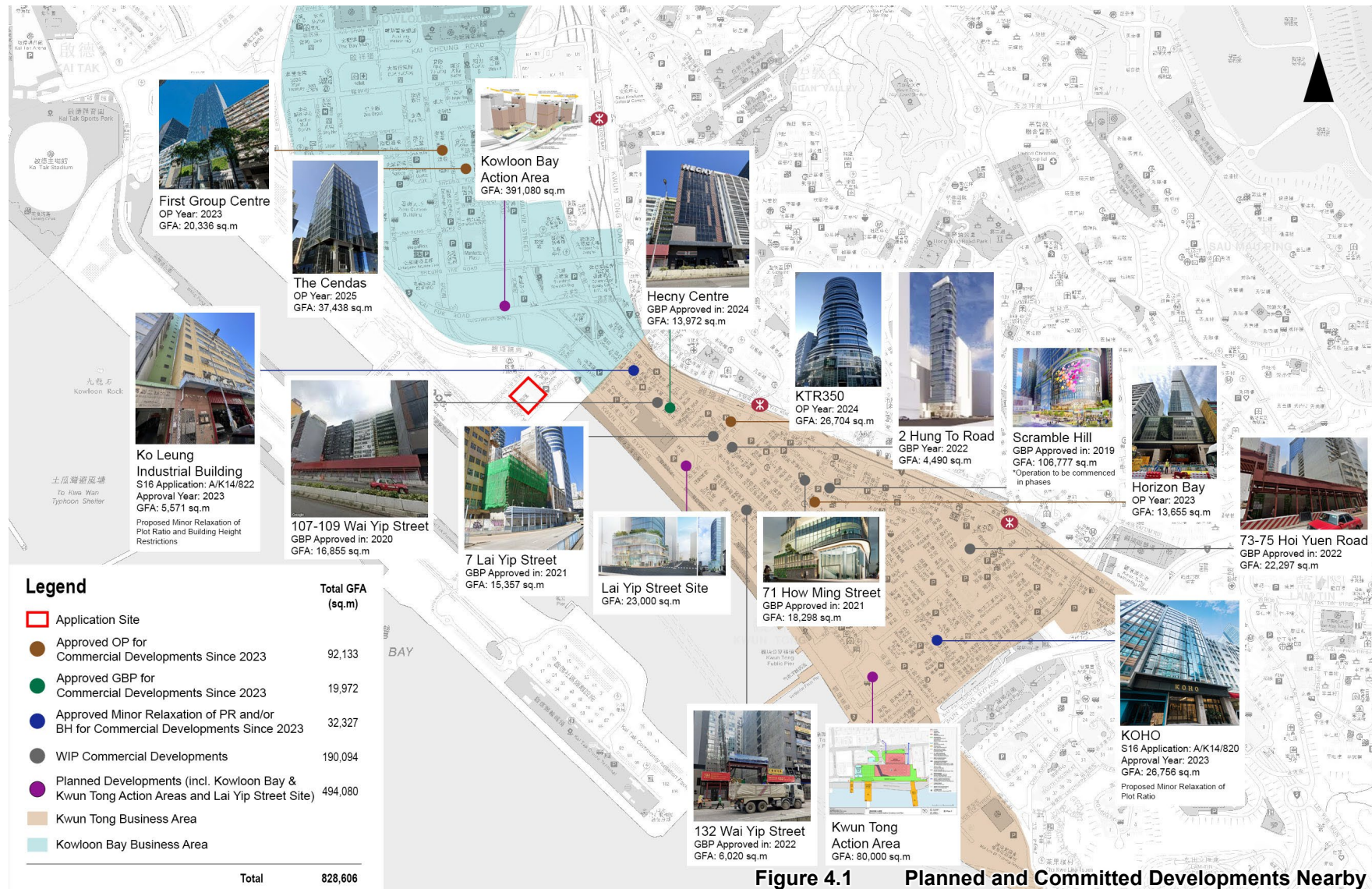
4.1 The Proposed Composite Development Responds to the Market Demand and is In-line with Government’s Policies of Increasing Housing Supply

- 4.1.1 The Policy Addresses have emphasised the need to increase land supply since 2013. The then Chief Executive, amongst his *“strong measures to increase housing supply in the short to medium-term”*, had *“asked the policy bureaux to act decisively to optimise the use of land and, where the original intended use is not required anymore, to convert the land for housing development or other uses that meet the more pressing needs in the community as soon as possible.”* The subsequent policy addresses, up to 2024, and the corresponding policy initiatives continue to focus strongly on increasing housing supply.
- 4.1.2 In conjunction with the Policy Addresses, the Long-Term Housing Strategy (“LTHS”) Steering Committee has proposed a “supply-led” approach along with a supply target for the upcoming decade. The annual Progress Report 2025 of the LTHS has estimated a total housing supply target of 420,000 units for the ten years from 2026-27 to 2035-36. To meet this target, the Government is adopting a multi-pronged approach to expedite and increase the overall housing land supply. This includes enhancing the development intensity of some planned but undeveloped housing sites to boost flat supply in the short to medium term.
- 4.1.3 Meanwhile, the vacancy rate for private office floor space in the Kwun Tong district is substantially higher as compared to the overall territorial vacancy rate; the vacancy rate reached 22.1% in Kwun Tong district in 2024 whereas it was 16.3% in the Territory (property review 2025 refers). This indicates that there are over supply in office floor space in the area. The 2025-26 Budget stated that the commercial property market has faced considerable challenges over the past few years and in view of the high vacancy rates of offices, the Government will consider allowing greater flexibility in land use of commercial sites and rezoning some commercial sites for residential use.
- 4.1.4 As the 2024 Policy Address has pointed out, private housing supply is a key component in solving the housing shortage in Hong Kong. It is highlighted that spade-ready sites and redevelopment are some of the short- to medium-term solutions to the issue. The Proposed Composite Development, with minor relaxation of PR, will enable a more efficient use of land within the newly developed Kai Tak Development. Such relaxation and development will provide 1,180 housing units in response to the market demand for housing supply. It is also in line with the steps taken by the Government to intensify the development intensity through s16 Planning Applications in the area to boost housing supply.

4.2 Minimal Impact to the Energising Kowloon East

- 4.2.1 The Government promulgated the Energizing Kowloon East initiatives in 2011, with the objectives to transform Kowloon East comprising the Kai Tak Development Area, the Kwun Tong Business Area and the Kowloon Bay Business Area into Hong Kong's second core business district ("CBD2") and to ensure a steady supply of quality office space in support of the economic growth of Hong Kong and strengthening Hong Kong's global competitiveness. The Government also introduced two rounds of revitalisation scheme for industrial buildings to facilitate the redevelopment and wholesale conversion of industrial buildings, followed by the introduction of the scheme to charge land premium at standard rates for lease modifications of redevelopment of industrial buildings to encourage revitalisation of industrial building. A number of industrial buildings in Kowloon East have been or will be redeveloped or converted into office, shop and services and hotel uses. Besides, to ensure a steady and adequate supply of quality office space in Kowloon East, the Government has disposed eight pieces of government land in Kowloon East for commercial development since the promulgation of the Energizing Kowloon East initiatives.
- 4.2.2 In the past 5 years since 2023, a number of industrial buildings in Kwun Tong and Kowloon Bay Business Areas have been or will be redeveloped or converted into office use. Together with the planned developments, Kwun Tong and Kowloon Bay Business Areas would be expecting over 828,000m² of new office floor space (**Figure 4.1** refers) in the coming years. The Proposed Composite Development would inevitably reduce the office floor space, yet the decrease is minimal as compared to the new office floor space to be provided.
- 4.2.3 Not least, the Site is located outside the prime areas of Kwun Tong Business Area and the Kowloon Bay Business Area and is in fact located at the fringe of Kai Tak Development. Despite the Site is physically located at the area where the two Business Areas and Kai Tak Development intersect, it has little effect in interconnecting these areas; the role of Kowloon Bay Action Area in this aspect would probably be more critical. As such, it is considered that the Proposed Composite Development would have minimal impact to the integrity of Kowloon East.

Proposed Composite Development (with Flat and Retail/F&B)
with Minor Relaxation of Plot Ratio Restriction in “Commercial (2)” Zone at 8 Lam Chak Street, Kowloon
S16 Planning Application



4.3 The Proposed Residential Use is Compatible with the Surrounding Planned Land Uses

4.3.1 Back in 2017 when the Government rezoned Site 3E1 and 3E2, there was an intention to form a residential cluster at the South Apron Corner (para. 3.3(b) of TPB Paper No. 10236 refers). As detailed in **Section 2.3**, this has gradually been realised; the immediate surroundings of the Site, bounded by Cheung Yip Street, Lam Chak Street and Kai Hing Road, is categorised by several high-rise residential developments planned in the vicinity – notably to the east and southwest of the Site. Given the proximity to other residential uses adjacent to the Site, there is no distinctive difference in the site context between the Site and other planned residential developments nearby. Moreover, technical assessments attached to this Supporting Planning Statement prove that other uses in the vicinity would not cause any insurmountable impacts to the future residents. Therefore, the Proposed Composite Development is considered compatible with the future surrounding context.

4.4 The Site and the Proposed Development Contain Special Characteristics and Would Not Generate Significant Precedent Effect

4.4.1 The Application Site falls outside Kwun Tong and Kowloon Bay Business Areas and is within the South Apron Corner of Kai Tak Development. The existing commercial building and the 35-year-old Pacific Trade Centre could hardly be able to enjoy the agglomeration effect. Occupancy of the existing commercial building remains relatively low over the years. Coupled with the economic downturn as well as the intention to form a residential cluster at the area, the sustainability of a commercial development at the Site has become skeptical. Therefore, redeveloping the existing building for a residential development seem to be more viable.

4.4.2 While Pacific Trade Centre has a fragmented ownership pattern which would not be favourable for redevelopment, there remains only one potential site that shares a similar characteristic – Kerry D. G. Godown (Kowloon Bay). The Town Planning Board may consider the appropriateness of any non-commercial uses at this site on individual merit basis. Other than this, there is no other commercial sites in the South Apron Corner nor in the Kwun Tong and Kowloon Bay Business Areas would have similar characteristics that would cause precedent effect. Taking into consideration of the economies of agglomeration, commercial uses would continue to be the predominant use within Kwun Tong and Kowloon Bay Business Areas.

4.5 The Proposed Composite Development Would Bring a Better Street Environment than the Existing Building

4.5.1 The Proposed Composite Development would help to inject life and bring improvement to the street environment on all three sides, i.e. Kai Hing Road, Lam Chak Street and Cheung Yip Street. The existing building at the Site has a large podium of about 13m in height, occupies about 94.906% of the site area (i.e. the site coverage) and basically has no active frontage apart from the entrance to the lobby. These would not be an appealing walking environment for a residential area.



Figure 4.2 Existing High Site Coverage Commercial Building

4.5.2 The Proposed Composite Development enhances the street environment in various ways. Firstly, instead of blank walls, the Proposed Development Scheme provides active street frontage on all three sides. This offers natural surveillance to the future residential area, not to mention the retail and food restaurants/outlets to be provided. Secondly, it also provides 2.5m setbacks on both Kai Hing Road and Lam Chak Street to offer a more spacious walking environment. Moreover,

the Proposed Development Scheme provides a 15m setback that responds to the existing and future building separations as observed on site and with reference to the approved development schemes of the adjacent development. This setback would provide a possible connection with the building gap between New Acute Hospital and Kai Tak Fire Station as well as the building gap as proposed in the approved development scheme under planning application no. A/K22/31 (Figure 4.3 refers).



Figure 4.3 The Proposed 15m Setback

4.5.3 Lastly, The Proposed Development Scheme will provide a 1.5m wide canopy outside the commercial portion along Kai Hing Road and Lam Chak Street.

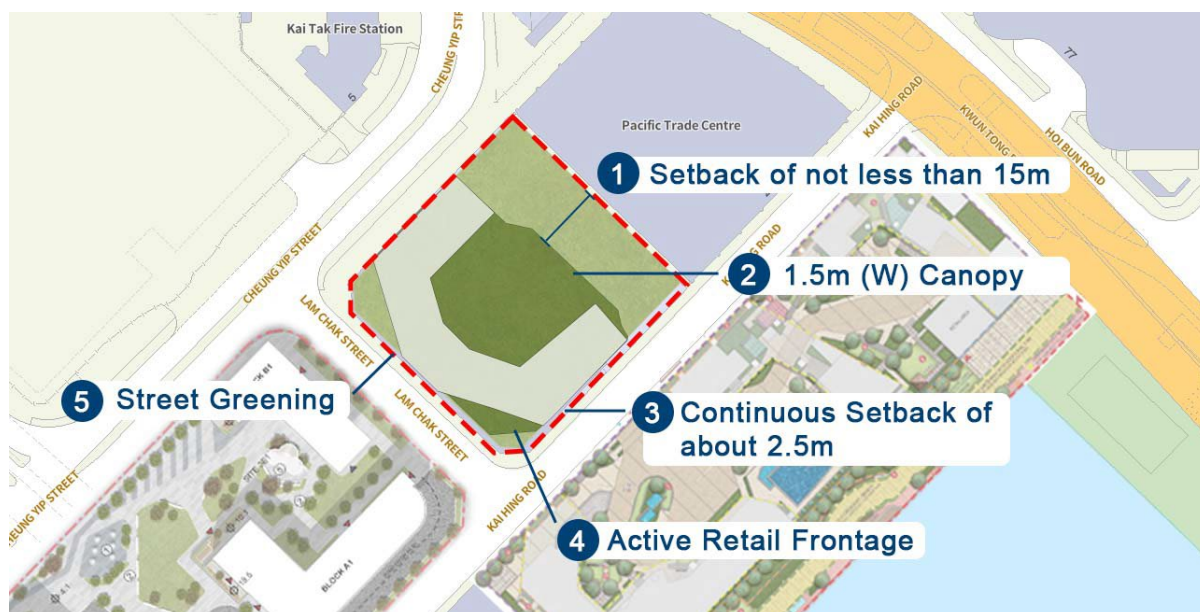


Figure 4.4 Design Merits

4.6 The Proposed Development Scheme Adopts Design Strategies to Enhance Livability and Safety

4.6.1 The Proposed Development Scheme provides a 15m setback connecting Cheung Yip Street and Kai Hing Road and create a permeable zone between the Proposed Composite Development and the existing Pacific Trade Centre. This significant setback is designed to allow air to penetrate at pedestrian street level and to effectively minimising wall effect along Cheung Yip Street and Kai Hing Road (**Figure 4.4** refers).

4.6.2 According to the Explanatory Statement of the Approved OZP, development is encouraged to enhance air ventilation. The proposed setback does not only help to promote better airflow but also improve the overall living environment of the vicinity, providing residents with a more pleasant and livable environment.

4.6.3 Moreover, the positioning of the towers has been carefully planned with regard to the nearby LPG Filling Station located on Cheung Yip Street. According to the Section 7.3 of HKPSG, high-rise residential/ educational/ hospital uses shall have a separation distance of 55m between a LPG Filling Station. To comply with this guideline, the residential towers have been placed outside the 55-meter radius of the LPG Filling Station and a Qualitative Risk Assessment has been carried out (**Appendix VII** refers).

4.7 The Proposed Composite Development Provides Retail Floor Space to the Meet Growing Demand and Contributes to the Development of Kai Tak

4.7.1 Currently, there is very limited retail and F&B facilities in the area. Noted from the submission documents of two approved planning applications A/K22/43 and A/K22/31, there will be 6,248m² and 600m² retail/F&B floor space in the approved residential developments to serve the future residents. The Proposed Composite Development also features a designated retail floor space of 3,270.5 m² on the ground level and the first floor in responds to the anticipated population growth resulting from the Proposed Composite Development as well as the planned residential developments in the vicinity. By integrating retail options, the development can offer access to a wide range of essential services and shopping to the local community.

4.7.2 Moreover, street-level retail facilities would help to establish a vibrant and energised street environment. Abutting Cheung Yip Street, Lam Chak Street and Kai Hing Road, the retail spaces are designed to enhance the vibrancy of the area by creating engaging and active frontages that attract foot traffic and foster a lively community atmosphere. This is particularly important given that the Site is located near both the Kai Tak and Kwun Tong Promenade. Directly southwest of the Site, across Lam Chak Street, is a planned development offering at-grade open space leading to the Kai Tak Promenade. According to the Explanatory Statement of the Approved OZP, development is encouraged to enhance interaction in the community. The proposed retail facilities align with this objective and complement the walking experience along the waterfront, and provide more retail options to the users of the open space across Lam Chak Street.

4.8 The Scale of Relaxation Sought is Acceptable and In Line with the Recommendations of the Hong Kong Planning Standards and Guidelines and the Planned Development Intensity of the Area

4.8.1 According to para. 3.2.5 of the Hong Kong Planning Standards and Guidelines (“HKPSG”), the maximum domestic PR is generally 6.5 in the new development areas (such as Kai Tak Development). The proposed domestic PR of 6.5 is completely in line with the recommendations under HKPSG; it also aligns with the approved development parameters for Site 3E1 and 3E2 located to the southwest of the Site.

4.8.2 Below is an inventory of the permissible PR and site coverage of the existing/planned residential developments in Kai Tak Development stipulated in the prevailing Approved OZP:

Table 4.1 Permissible Plot Ratio and Site Coverage in Other Residential Sites Stipulated in the Approved OZP

Zoning (For Residential Use)	Permissible Plot Ratio (DPR+NDPR)	Permissible Site Coverage (excl. basement)
Residential (Group A)1	7.5+1.0	-
Residential (Group A)5	6.5+1.5	65%
Residential (Group A)6	6.5+1.0	65%
Residential (Group B)8	7.5	40%
Comprehensive Development Area 4	7.5	65%
* Site 3E1 and 3E2 (zoned “R(B)2”)	7.0	40%
Residential (Group B)7	7.0	40%
Comprehensive Development Area 5	6.8	40%
Residential (Group A)2	6.3+0.3	-
Residential (Group A)4	6.6	-
Residential (Group B)6	6.6	40%
Residential (Group B)5	6.1	40%
Residential (Group A)3	5.51+0.1	-
Residential (Group B)4	5.5	40%
Residential (Group B)1	5.0	40%
Residential (Group B)2	4.5	40%
Residential (Group B)3	3.5	44%

* Approved by TPB on 2 May 2025 under Application No. A/K22/43

4.8.3 With reference to **Table 4.1** above, the total PR of the residential sites in Kai Tak Development ranges from 3.5 to 8.5. The proposed PR of 7.0 (domestic PR 6.5 + non-domestic PR 0.5) under the current application is not exceptionally high, given “R(A)1”, “R(A)5”, “R(A)6”, “R(A)7”, “R(B)8” and “CDA(4)” zones share the same or have an even higher PR (i.e. PR7.0 and above). The Proposed Composite Development, with a minor relaxation of total PR from 5.0 to 7.0, is considered acceptable and compatible with the planned and existing development intensity within Kai Tak Development.

4.8.4 At a closer proximity in the Runway Area, there are twelve residential sites zoned “R(B)4”, “R(B)5”, “R(B)7” and “R(B)8” with varying restrictions on plot ratio from 5.5 to 7.5 (**Figure 4.5** refers). According to para. 9.4.4 of the Explanatory Statement attached to the Approved OZP, the varying restrictions “*feature an undulating and varied building height profile, with the tallest band of developments in the middle portion*”. The proposed plot ratio does not exceed the maximum plot ratio of the aforementioned and aligns with the principle of creating an undulating and varied building height profile.

the Kai Tak development in addressing the housing shortage in the short- to medium-term.

4.8.7 Considering the importance of efficient utilisation of land resources for providing housing units, the comparable permitted PR, and precedents in minor relaxation of PR at a similar scale, the proposed PR is considered reasonable and appropriate.

4.8.8 At the same time, **Figures 4.6 and 4.7** as well as the Visual Impact Assessment in **Appendix VI** all demonstrate that the Proposed Composite Development would not bring adverse visual impact than the existing development.

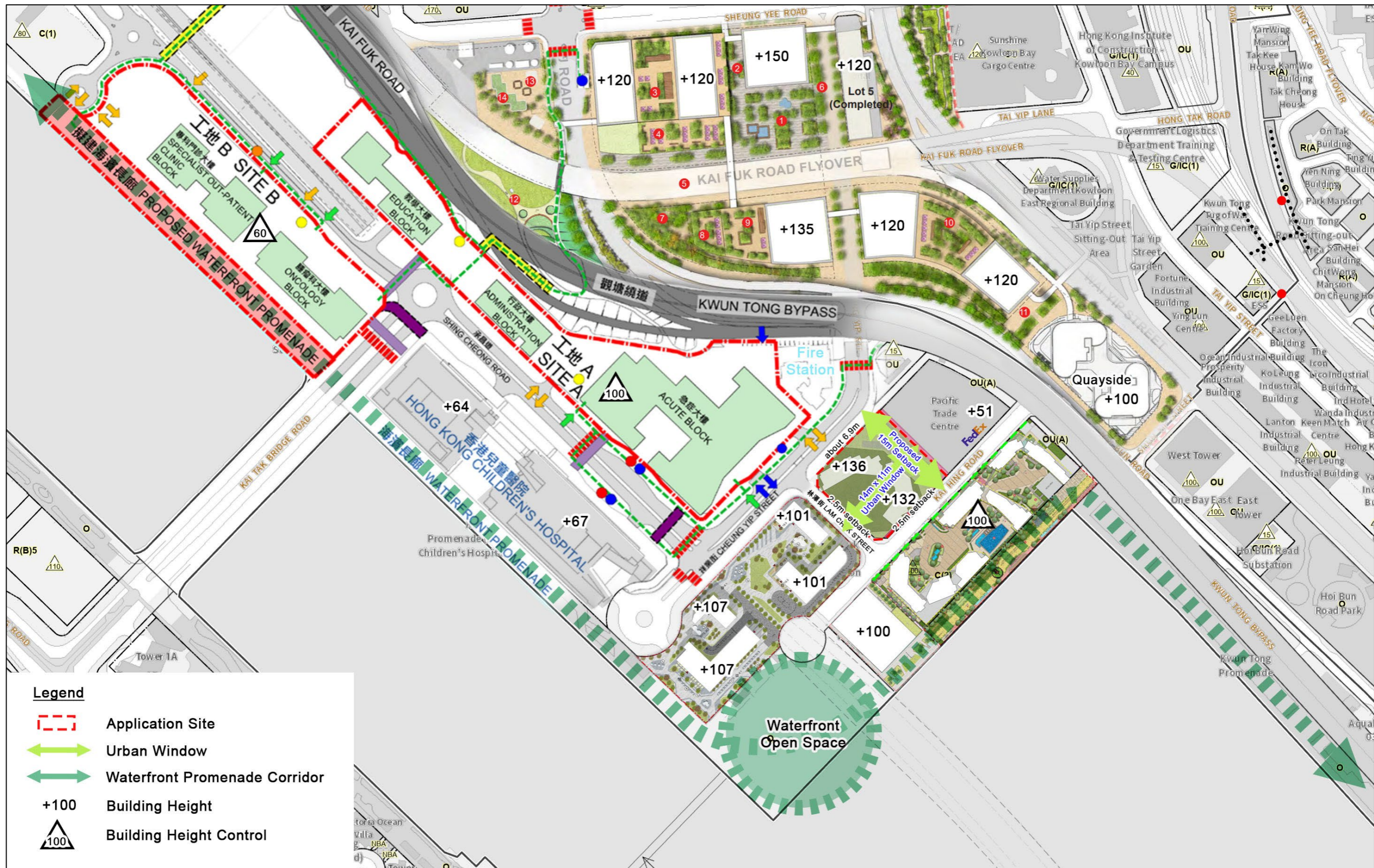


Figure 4.6 Building Height and Urban Design of Surrounding Existing, Planned and Proposed Developments

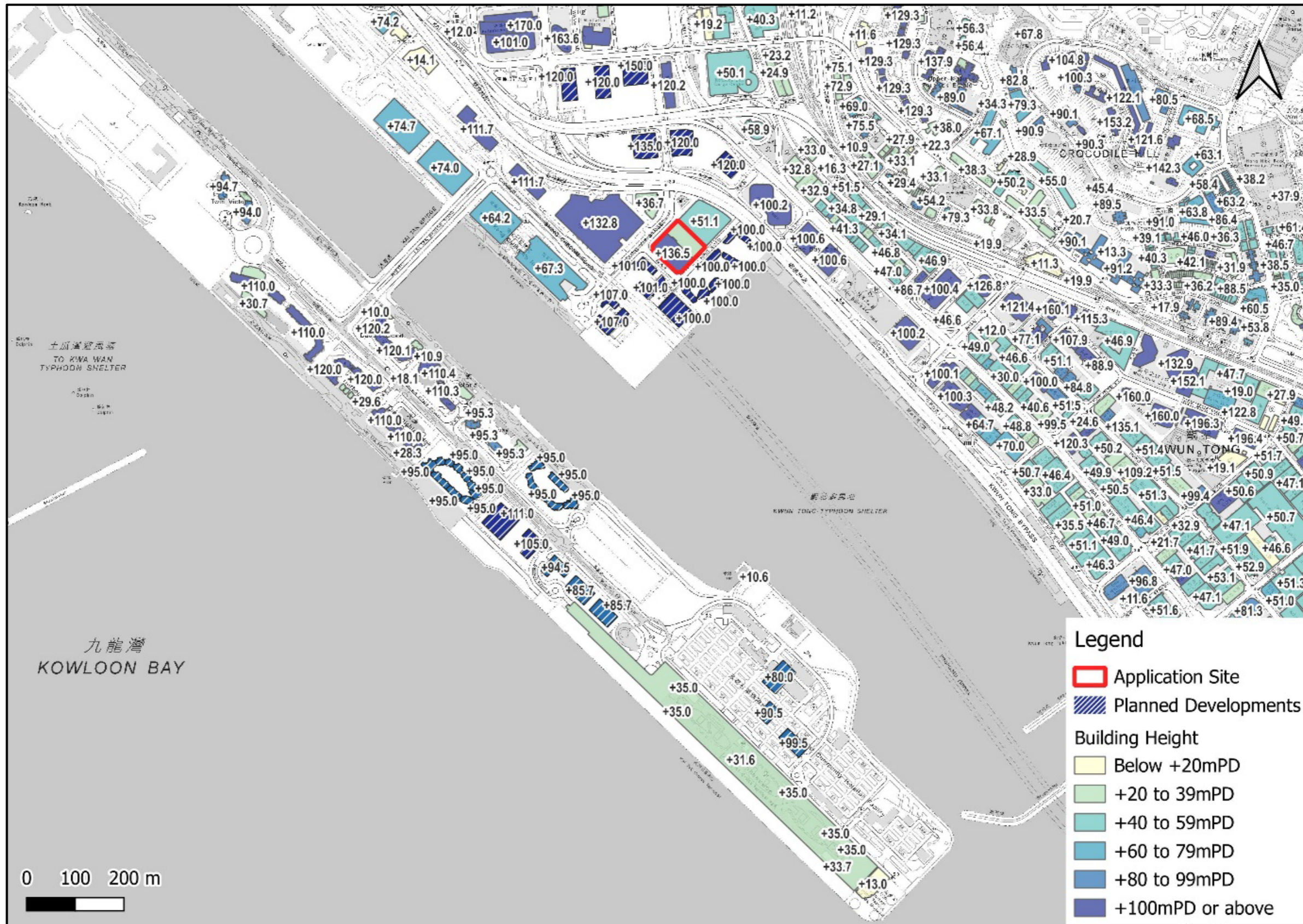


Figure 4.7 Building Heights of Surrounding Existing and Planned Developments

**Building height obtained from iB1000 and relevant planning applications*

4.9 The Proposed Development Scheme Complies with the Urban Design Concept for Kai Tak Development Area

4.9.1 As detailed above, eight urban design and landscape principles have been adopted in the Approved OZP. The Proposed Development Scheme has several design merits as illustrated in **Figures 4.3, 4.4 and 4.8**.



Figure 4.8 Neighbourhood Design Merits

4.9.2 The design merits provided in the Proposed Development Scheme help to activate the South Apron Corner through connecting the harbourfront areas through the development of retail nodes together with the planned retail floor space at Sites 3E1 & 2 to the opposite of the Site. At a site-level, the various design strategies help enhance the streetscape and urban design of the area, fully complying with the relevant principles as discussed in **Tables 4.2 and 4.3** below.

Table 4.2 Relevant Urban Design and Landscape Principles and the Proposed Development

	Urban Design and Landscape Principles	The Proposed Composite Development
(1)	Connecting the Neighbourhood	Considering the strategic location of the Site between the Kai Tak and Kwun Tong Waterfronts, the retail space at the Proposed Composite Development will be essential to support the local community and act as a major connecting point of the two promenades.
(2)	Creating Nodes	The Proposed Composite Development will contribute to the growing neighbourhood and create a retail node with vibrant active frontages at the South Apron Corner, which serves both the future residents and Kai Tak and Kwun Tong Promenades.
(3)	Activating the Harbour-front	Although the Site is not locating on the waterfront, the Proposed Composite Development would still be able to bring vibrancy and vitality to the waterfront. The strategic location of the Site and the provision of street-level retail are expected to activate the harbourfront of Kai Tak.
(4)	Creating a Pedestrian Friendly Environment	At-grade active retail frontages and street greening enhance the pedestrian experience along the Site. Setbacks along Kai Hing Road and Lam Chak Street further widen the footpaths, creating a more spacious and pedestrian-friendly environment.
(5)	Creating a Dynamic Skyline	The building height of not more than 136.45mPD, which is the building height of the existing building creates no major additional visual impact. The varying building height and 15m setback further demonstrates the sensitive design of the Proposed Composite Development, taking into consideration any potential visual impact.
(6)	Celebrating the Views	Whilst the proposed building height would not exceed the existing building height, the visual resources of the area will only be slightly affect by the Proposed Composite Development. Not least, the most valuable visual resource, the Victoria Harbour, would not be affected as the Site is located on the second row inland.
(7)	Celebrating the Gateways	Located along the visual gateway from the Victoria Harbour into the Kai Tak area, and visible from the marine gateway of the Kai Tak Cruise Terminal, the Proposed Composite Development has no major negative impact on the visual

	Urban Design and Landscape Principles	The Proposed Composite Development
		character, resources, or permeability of the area. Also located along one of the major vehicular gateways into the Kai Tak Development through Kwun Tong Bypass and Cheung Yip Street, the building design, disposition, and the setbacks enhance the visual interest of the Site compared with the existing condition.
(8)	Creating “A Green Web for Sustainable Development”	The greenery provision of not less than 30% of the total site area at various levels of the Proposed Composite Development, from ground floor to the second floor, would visually soften the built form and help promote a different sense of openness for the area.

4.9.3 Key considerations outlined in the UDGMs have also been incorporated into the Proposed Development Scheme. With reference to the summary in **Section 2.8**, the Proposed Development Development would fully in line with the design framework and approach set out by the UDGMs.

Table 4.3 Key Aspects of the Kai Tak Development Urban Design Guidelines and Manual and the Proposed Development

	Urban Design Guidelines and Manual	The Proposed Composite Development
(1)	Streetscape	<ul style="list-style-type: none"> The proposed retail facilities at ground level would help to enhance the streetscape through active frontages. Building setback on Kai Hing Road and Lam Chak Street contributes to widen the footpath for a better walking experience.
(2)	Façade	<ul style="list-style-type: none"> Adopt a building design that would be visually compatible with the surrounding environment.
(3)	Massing	<ul style="list-style-type: none"> Adopt a building design that would be visually compatible with the surrounding environment. Strike a balance between active street frontages (by having a self-sustained retail cluster) and provision of setbacks. The Proposed Development Scheme is in line with the design concept of discouragement of podium development. Break down building mass by means of a 15m setback. Building setback is provided at Kai Hing Road and Lam Chak Street.

	Urban Design Guidelines and Manual	The Proposed Composite Development
(4)	Building Performances	<ul style="list-style-type: none"> The proposed building shall fulfil the Sustainable Design Guidelines
(5)	At-grade Frontage	<ul style="list-style-type: none"> The proposed retail facilities at ground level would help to enhance the streetscape through active frontages.
(6)	Greening	<ul style="list-style-type: none"> The development will comply with greening requirements set by the UDGMs, including greening along the retail frontage and a total greening ratio of at least 30% of the Site. The greening ratio within the pedestrian zone is at least 20% of the site area. The greening ratio at roof level is at least 20% of the roof area.

4.10 The Proposed Composite Development Adopts the Vision Statement and Complies with the Harbour Planning Principles

4.10.1 Since the Site is located within the waterfront area of Kai Tak, the Proposed Development Scheme has paid due consideration to its strategic location and responded to the vision statement of the Harbour Planning Guidelines,

“Victoria Harbour and its harbour-front areas to become an attractive, vibrant, accessible and sustainable world-class asset: a harbour for the people, a harbour of life.”

Considering the prime location of the Site, being in close proximity to the waterfront promenades of both Kwun Tong and Kai Tak, the Proposed Composite Development has endeavoured to attract people with a diversity of uses and high permeability. The Proposed Composite Development has responded to the HPP as illustrated in **Table 4.4** below.

Table 4.4 Harbour Planning Principles and the Proposed Development

	Harbour Planning Principles	The Proposed Composite Development
(1)	Preserving Victoria Harbour	<ul style="list-style-type: none"> The Proposed Development does not involve any reclamation or destruction of Victoria Harbour. It is preserved as a natural asset for the public. The Proposed Composite Development, with a building height of not more than the existing building (around +136.5mPD), is considered visually compatible with the existing development when viewed from strategic vantage points such as Quarry

	Harbour Planning Principles	The Proposed Composite Development
		<p>Bay Park and brings no unacceptable visual impact in terms of building height.</p> <ul style="list-style-type: none"> ▪ The building setback will enable visual permeability from the harbour-front towards the inland areas.
(2)	Stakeholder Engagement	<ul style="list-style-type: none"> ▪ Under the statutory town planning system, the public would have the opportunity to provide comments during the 3-week public consultation period.
(3)	Sustainable Development	<ul style="list-style-type: none"> ▪ The Proposed Composite Development aims to cater for the economic, social and environmental needs of the society and is compatible with the harbourfront setting. The proposed retail facilities on the ground level of the Proposed Composite Development would help to achieve a balanced mix of land uses, responding to the retail needs of the residential neighbourhood at the South Apron Corner of the Kai Tak Development and provide local job opportunities. ▪ The proposed residential towers will offer 1,180 housing units on readily available land to expedite housing supply, responding to the social need for housing and addressing the housing shortage. ▪ The proposed setback and greening across different levels of the Proposed Composite Development all demonstrated a genuine effort to sustainable development. ▪ Carefully thought-out tower form and disposition would enhance visual permeability towards the inland areas as viewed from the waterfront. ▪ Various technical assessments have been carried out, and the results demonstrated that the proposed scheme is technically feasible.
(4)	Integrated Planning	<ul style="list-style-type: none"> ▪ The Proposed Composite Development with active retail frontage integrates with the planned retail and open spaces at the adjacent sites east and southwest of the Site.
(5)	Proactive Harbour Enhancement	<ul style="list-style-type: none"> ▪ The Proposed Development adopts various sensitive design measures, including the provision of genuient building separation from the adjacent building, multi-levelled greenery and setback of building for the widened footpaths to enhance

	Harbour Planning Principles	The Proposed Composite Development
		overall design quality and pedestrian experience at the waterfront.
(6)	Vibrant Harbour	<ul style="list-style-type: none"> The retail facilities of the Proposed Composite Development will contribute to enhancing the vibrancy and vitality of the waterfront area.
(7)	Accessible Harbour	<ul style="list-style-type: none"> The building setback allows pedestrians and residents to enjoy a better walking experience towards the waterfront promenade through the network of open spaces provided in the area.
(8)	Public Enjoyment	<ul style="list-style-type: none"> The retail provision will form a vibrant public space and venue for public enjoyment. The active waterfront, easily accessible from the Site, will also provide an enjoyable pedestrian experience for the residents and visitors.

4.11 The Proposal is Technically Feasible

Traffic Aspect

- 4.11.1 The potential traffic impact arising from the Site has been quantitatively assessed, including capacity analysis of the identified critical junction and road links for both reference (without proposed development) and design scenarios (with proposed development) in year 2036 (**Appendix III** refers).
- 4.11.2 Comparing with the existing commercial use, it is anticipated that the proposed development would generate and attract -21 pcu/hr and -103 pcu/hr during AM peak hour respectively, and generate and attract -59 pcu/hr and -22 pcu/hr during PM peak hour respectively.
- 4.11.3 The junction capacity analysis based revealed that all critical junctions would still operate within their capacities in both reference scenario (without proposed development) and design scenario (with proposed development) in 2036 during the peak hours. That said, traffic trips related to the Proposed Composite Development would be absorbed by the nearby road network and no significant traffic impact would be anticipated.

Environmental Aspect

- 4.11.4 The Environmental Assessment in **Appendix IV** covers assessment of environmental noise and air quality impact, as well as to appraise land contamination impact.
- 4.11.5 According to the Noise Impact Assessment in the Environmental Assessment, with the following recommended road traffic noise mitigation measures in place, full compliance with the relevant noise criterion of L10(1-hour) 70dB(A) stated in HKPSG can be achieved for the Proposed Development:
- Acoustic Window / Enhanced Acoustic Balcony (Baffle Type)
 - Fixed Glazing (with or without Maintenance Window) at window façade that are not necessary to serve ventilation purpose
 - Sound Absorptive Material at the surface facing the opening where necessary
- 4.11.6 A noise impact assessment has been conducted to assess the potential road traffic noise and fixed noise impacts that may affect the Proposed Composite Development. While the predicted road traffic noise levels at some noise sensitive receivers (NSRs) would exceed the relevant noise criteria of 55dB(A) for isolation room or 70 dB(A) for dwelling and office uses, noise conscious design of setback and mitigation measures including baffle type acoustic window have been proposed to comply with relevant guidelines. Assessment on fixed noise impact also confirmed that predicted fixed noise level at all NSRs has complied with the requirement of relevant technical memorandum under Noise Control Ordinance. It is concluded that no adverse traffic and fixed noise impact is anticipated on the Proposed Composite Development with the implementation of the recommended mitigation measures.
- 4.11.7 Several fixed noise sources have been identified, mostly from the west of the Application Site as well as Quayside and One Bay East on the north and northeast of the Application Site respectively. Detailed calculation of noise impact and overall predicted noise levels among the representative assessment points have been carried out. The results revealed that the predicted noise level is well below the applicable noise criteria. There is no exceedance of any noise standard during different time periods, thus no adverse fixed noise impact would be anticipated.
- 4.11.8 With regard to air quality, site surveys had been conducted and confirmed that there is no existing and planned industrial sources and chimneys identified within 200m from the Application Site. According to the Preliminary Environmental Review for New Acute Hospital (which under construction), there are three proposed chimneys at New Acute Hospital. The nearest chimneys at the New

Acute Hospital are over 200m away from the Application Site. Since the horizontal buffer distance is deemed to have complied with recommended buffer distance of chimney stack under HKPSG, no adverse air quality impact from the industrial / chimney emissions would be anticipated.

4.11.9 At the same time, the Proposed Development Schem is also able to comply with the required buffer distance as stipulated in the HKPSG. The Environmental Assessment has confirmed that there is no air sensitive use, including fresh air intake of ventilation system or openable windows of the buildings, recreational uses located within the buffer zone. Therefore, no adverse vehicular emission impact is anticipated.

4.11.10 With regard to land contamination, based on the desktop review of the historical information, the Application Site was being used as container terminal and open storage for the containers from Years 1968 to 1986, a bus depot from 1991 to 1993 and then redeveloped into the existing building in 2010. While historical land use shown that the Application Site was used as a bus depot and container storage, these land uses do not involve potential land contamination source and land contamination such as, fuel storage tanks, and fuel filling facilities. Therefore, land contamination arising from these historical uses would not be anticipated. The Site is currently occupied by a commercial building with basement and the basement construction would likely have removed any potentially contaminated soil (if any). While the basement is fully paved and in good condition, no potential land contamination issue has been identified.

Drainage and Sewerage Aspect

4.11.11 The Drainage and Sewerage Impact Assessment ("DSIA") in **Appendix V** has briefly reviewed the potential drainage impact and quantitatively assessed the potential drainage and sewerage impact by comparing the estimated sewage flow from the Proposed Composite Development and the capacity of the existing sewerage system in the vicinity.

4.11.12 In terms of drainage, as the total paved area and in turn the surface runoff is expected to decrease after development, it is anticipated that there is no adverse impact on the existing drainage pipe receiving runoff from the site.

4.11.13 Based on the sewerage impact assessment results, an existing sewerage pipe (S2-S3) shall be upgraded to Ø300mm pipe in order to cater for cumulative sewage generated from the Proposed Composite Development and nearby catchment areas. With the proposed upgrading work in place, the hydraulic capacity will be adequate to receive cumulative sewage discharge. Therefore, the assessment confirms that the Proposed Composite Development would not cast adverse impact on the public sewerage system.

5. CONCLUSION AND SUMMARY

5.1.1 This Pre-submission Enquiry is prepared and submitted on behalf of Health Link Limited (the “Applicant”) to seek departmental comments prior to the formal submission to the Town Planning Board (“TPB”) under Section 16 of the Town Planning Ordinance for the Proposed Minor Relaxation of Plot Ratio (PR) Restriction for Proposed Composite Development (with Flat and Retail/F&B) at 8 Lam Chak Street, Kowloon (“Application Site”/ “the Site”) from 5.0 to 7.0. The Site falls within “Commercial (2)” (“C(2)”) zone on the Approved Kai Tak Outline Zoning Plan (“Approved OZP”) No. S/K22/8. The Proposed Composite Development with minor relaxation of Plot Ratio Restriction is fully justified due to the following reasons:

- The Proposed Composite Development responds to the market demand and is in line with the Government’s policies of increasing housing supply
- The proposed residential use is compatible with the surrounding planned land uses
- The Proposed Composite Development would bring a better street environment than the existing building
- The Proposed Development Scheme adopts design strategies to enhance livability and safety
- The Proposed Composite Development provides retail floor space to meet the growing demand and contributes to the development of Kai Tak
- The scale of relaxation sought is acceptable and in line with the planned development intensity of the area
- The Proposed Development Scheme complies with the urban design concept for Kai Tak Development Area
- The Proposed Development Scheme adopts the Vision Statement and complies with the Harbour Planning Principles
- Various technical assessments have been carried out and the findings concluded that the Proposal is technically feasible without posing negative impact onto the surrounding environment.