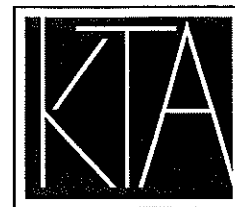


By Hand and By Email

Our Ref: S3168/LCS/25/011Lg

14 August 2026

Secretary, Town Planning Board
15/F, North Point Government Offices
333 Java Road
North Point
Hong Kong



PLANNING LIMITED
規劃顧問有限公司

UNIT K, 16/F, MG TOWER
133 HOI BUN ROAD, KWUN TONG
KOWLOON, HONG KONG
九龍觀塘海濱道133號
萬兆豐中心16樓K室
電話TEL (852) 3426 8451
傳真FAX (852) 3426 9737
電郵EMAIL kta@ktaplanning.com

Dear Sir/Madam,

**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 –
TPB Ref.: A/K22/50
Further Information No. 2**

Reference is made to the captioned S16 Planning Application submitted to the Town Planning Board on 1 June 2026 and various departmental comments received in August 2026.

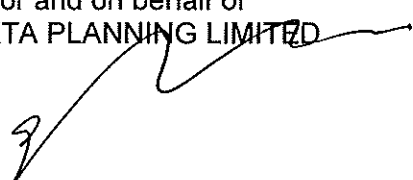
In response to the departmental comments received, please find attached the Further Information ("F.I.") submission. The submission document consists of:

- Appendix I Updated Architectural Drawings
- Appendix II Updated Landscape Drawings
- Appendix III Replacement Pages of the Traffic Impact Assessment
- Appendix IV Replacement Pages of the Visual Impact Assessment
- Appendix V Replacement Pages of the Supporting Planning Statement

Meanwhile, should you have any queries in relation to the attached, please do not hesitate to contact Mr Kenneth to or the undersigned at [REDACTED]

Thank you for your kind attention.

Yours faithfully
For and on behalf of
KTA PLANNING LIMITED


Gladys Ng

Encl. (4 hard copies)

cc. DPO/K – Ms Helen Ip
the Applicant & Team

KT/GN/vy



FS 579819



**Proposed Composite Development (with Flat and Retail/F&B)
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RESPONSE-TO-COMMENT TABLE

**Proposed Composite Development (with Flat and Retail/F&B)
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in “Commercial (2)” Zone at 8 Lam Chak Street, Kowloon
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(Planning Application No: A/K22/50)

Comments	Response									
<u>Comments from Social Welfare Department:</u> (Contact Person: Mr Michael Pang; Tel: 2116 5939) In your response to SWD’s previous comment as indicated in the response-to-comment table, it is noted that the applicant is now proposing to reserve about 490 square metres in GFA for provision of GIC facilities which may include youth centre, childcare centre and nursery. Please note that SWD has no plan to provide a Child Care Centre nor an Integrated Children and Youth Services Centre at the subject site taking into account the planned welfare provision in the vicinity of the subject site. As the applicant does not have a concrete plan of what kind of welfare facilities that she wishes to provide in her proposed composite redevelopment, we have taken the opportunity to consult our service branches and would like to set up an office base of Transitional Support Service for Persons in Mental Recovery (TSS for PMRs) as well as a sub-base for Support Centre for Persons with Autism (SPA) at the subject site with the following accommodation requirements – <table><tr><th>Welfare facility</th><th>Net operational floor area (square metres)</th><th>Parking space and loading / unloading bay requirement</th></tr><tr><td>TSS for PMRs</td><td>112.4</td><td>Nil</td></tr><tr><td>SPA Sub-base</td><td>66.2</td><td>Nil</td></tr></table>	Welfare facility	Net operational floor area (square metres)	Parking space and loading / unloading bay requirement	TSS for PMRs	112.4	Nil	SPA Sub-base	66.2	Nil	Please be kindly confirmed that, instead of the two newly suggested GIC uses, the Applicant intends to maintain their original proposal to provide about 490sqm of GIC facilities within the Proposed Composite Development. These privately run GIC facilities may include youth centre, childcare centre, nursery and etc. The Applicant notes that the proposed GFA would not be exempted from GFA calculation and the GIC uses will not receive funding from the Government.
Welfare facility	Net operational floor area (square metres)	Parking space and loading / unloading bay requirement								
TSS for PMRs	112.4	Nil								
SPA Sub-base	66.2	Nil								

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Comments	Response
<u>Comments from District Planning Office, Planning Department:</u> (Contact Person: Ms Helen Ip; Tel: 2231 4971) <u>Design Considerations</u> 1. <u>Provision of 2.5m-wide Building Setbacks and 1.5m-wide Canopy along Lam Chak Street and Kai Hing Road and Provision of a Corner Splay Area at Lam Chak Street and Kai Hing Road</u> 1.1 With reference to the Planning Statement Para. 3.2.2, the proposed 2.5m- wide setbacks from Lam Chak Street and Kai Hing Road and provision of 1.5m-wide canopy within the setback areas are intended to provide more space along the existing streets and <u>to enhance walking experience</u>. However, in the R-to-C Pg. 10, item 3(a), the <i>‘existing pavement on Kai Hing Road, Lam Chak Street and Chak Cheung Street have sufficient width and do not require widening. The proposed setbacks would be used for socializing and space for landscaping’</i>. To clarify, please further elaborate on the intentions of the concerned setback areas, including the meaning of ‘socializing’. More details are required, including but not limited to, (i) whether the public will be allowed access into the setback areas; (ii) whether there are any opening hours of these passageways; and (iii) how walking experience of the general public can be enhanced by the setbacks and canopies. 1.2 Regarding the corner splay area at Lam Chak Street and Kai Hing Road, it is noted from the R-to-C Pg. 10, item 3(b) and revised Landscape Master Plan that this concerned area is now proposed for <i>‘socializing and landscaping’</i> and <i>‘outdoor sitting area’</i> (instead of ‘outdoor dining area’ in the submission received by TPB on 16.6.2026). Please advise (i) whether this	These setbacks on Lam Chak Street and Kai Hing Road are designed to complement the shop frontages. The public will be able to access these areas at least during the operation hours of the non-domestic portion of the proposed development. Pedestrians will be able to enjoy some shading benefiting from the proposed canopies, improved visual amenity with the proposed at-grade greenery and energised streetscape with shop frontages. (i) The corner splay area at Lam Chak Street and Kai Hing Road will be an open area that is publicly accessible and managed by the non-domestic portion of the proposed development. (ii) The general public will be allowed to walk through this area. (iii) Similar to the setbacks, the corner splay area will be publicly accessible at least during the operation hours of the non-domestic

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Comments	Response
<i>‘outdoor sitting area’</i> is for the public or residents or patrons of the retail shops; (ii) whether the general public are allowed to walk through this area; and (iii) if affirmative to (ii), whether there will be restricted hours for public access. 1.3 We would reiterate our previous comment that if the above proposals are to be considered as ‘planning gains’ by the applicant, there should be elaborations on how the measures will enhance local connectivity and/or benefit the general public. The Consultant has not provided any responses in the R-to-C. 2. <u>Provision of GIC Facilities</u> 2.1 It is noted that the applicant commits to reserve about 15% of non- domestic GFA for GIC uses to be operated by NGOs, which could serve as youth centre, childcare centre, nursery and etc.. However, there is still a lack of details regarding the specific uses supported by justifications and implementation mechanism to ensure such provision upon redevelopment for treating this proposal as a ‘planning gain’. 3. <u>TIA</u> 3.1 The applicant is required to provide response to our previous comment under item 13 of R-to-C Pg. 14, on whether the possible GIC facilities have been included the traffic impact assessment including traffic flow and parking requirements.	portion of the proposed development. Noted, please refer to our responses above. Please be kindly confirmed that the Applicant intends to provide about 490sqm of GIC facilities within the Proposed Composite Development. These privately run GIC facilities may include youth centre, childcare centre, nursery and etc. The Applicant notes that the proposed GFA would not be exempted from GFA calculation and the GIC uses will not receive funding from the Government. Noting that the subsidised GIC facilities will offer standardized services that aims at resolving core social issues; it would be beneficial to have some privately-operated youth centre, childcare centre, nursery that could respond to supply-demand with flexibility. The latest proposed uses of the development, including Shop/F&B and GIC Facilities have been reflected in the traffic assessment. As shown in Table 4.4, separating the small-scale GIC uses from Shop/F&B would only result in minimal increase in trips and will not

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Comments	Response
<u>Specific Comments on Drawings</u> Please note the following plans have yet been updated/provided in this FI submission. <i>Ground Floor Plan</i> 4. Despite the R-to-C Pg.12, item 5, the revised G/F plan is not provided. Our previous comment on the level of “Shuttle Lobby” remains valid. <i>Indicative Master Layout Plan and Ground Floor Plan</i> 5. In relation to our comments above on the corner splay area and 4m-wide public passage, please review if the colour/legend is accurate and advise if these areas are intended to serve as circulation space. <i>Roof Floor Plan</i> 6. Please also indicate the roof area of podium and shuttle lobby on this plan. <i>Indicative Sections B-B and C-C</i> 7. In view of the changes to the roof top structures indicated on the revised MLP, please review the roof top structures at Tower 2A. <i>Landscape Proposal</i> 8. <i>Drawing No. LMP01 Landscape Master Plan (Overall View):</i> The keys for No. 16 to No. 18 are still missing noting that their annotations remain on plan. The roof level of “Shuttle Lobby” is incorrect. The	result in any changes to the junction performances. Not least, the overall conclusion (i.e. reduce traffic to the nearby road network) remains unchanged. The level of the “Shuttle Lobby” has been amended (<i>Appendix I</i> refers). The MLP and G/F Plan have been amended (<i>Appendix I</i> refers). The Roof/F Plan has been amended (<i>Appendix I</i> refers). Sections B-B and C-C have been amended (<i>Appendix I</i> refers). Drawing No. LMP01 has been amended (<i>Appendix II</i> refers).

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Comments	Response
number of roof top structures at Tower 2A is also inconsistent with that shown on the revised MLP.	
9. <i>Drawing No. LMP04 Landscape Master Plan (2/F)</i>: The key for No. 9 is missing despite its annotation is shown on plan.	Annotation 9 has been deleted. Dwg. No. LMP04 has been amended (<i>Appendix II</i> refers).
10. <i>Drawing Nos. LD101, LD102 and LD103</i>: Please add ‘Edge Planter with creeping plants’ on plan along 1/F facing public street to align with the updated Drawing No. LMP03. Please advise if there are any greenings on roof floors of Towers 1A, 2A and 2B as shown on Indicative Sections A-A and C-C.	Dwg. No. LD101, LD102 and LD103 has been revised accordingly (<i>Appendix II</i> refers). Please be confirmed that there would be no greening on roof floors of Towers 1A, 2A and 2B. The Indicative Section A-A and C-C have been revised.
11. <i>Drawing No. GC01 Greenery Provision</i>: It is noted that on 2/F, the greening area of about 633.7m² and covered planting area of about 123.5m² have been counted in both the greenery calculations at the primary zone and roof greening. Please note that provisions should not be double counted. Moreover, greenings on roof floors of Towers 1A, 2A and 2B are shown on Indicative Sections A-A and C-C but not shown on this greenery provision plan. Given it is a usual practice that details on greenery are finalized and provided at the detailed design stage which would be reflected on general building plans, for this s16 submission please (i) only show the ‘uncovered greenery at primary zone’, ‘covered greenery at primary zone’ and ‘greenery at roof’ and remove all the numbers showing their areas; (ii) update the colour for the greenery at 2/F which would either be counted at primary zone or at roof (for uncovered part); (iii) include greening provisions on roof floors of Towers 1A, 2A and 2B; and (iv) provide a summary table on this plan to show the provisions as stated in Para. 5.2 of the Landscape Proposal (extracted below).	For Drawing no. GC01, the detail on greenery has been deleted and they will be subject to detailed design. Summary table of the greenery provision as stated in Para. 5.2 has been added. With regard to roof greenery, it is confirmed that no greening is proposed on the roof floors of Towers 1A, 2A and 2B, and Indicative Sections A-A and C-C have been revised accordingly. In the absence of a clear definition of roof greenery in the Explanatory Statement, the proposed roof greenery will be provided on the podium roof as part of the accessible landscaped area. Covered greenery at the podium has also been excluded from the greenery calculation to avoid double counting and ensure consistency with Drawing No. GC01 and the revised Landscape Proposal.

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<u>Others</u> 12. Please provide the existing uses and occupancy rate of the existing building as supplementary information.	The subject building is currently occupied for general commercial and back-office operations, comprising the following: • Corporate & Administrative Offices (e.g., auditing, sourcing, logistics) • Information Technology & Data Infrastructure (e.g., IT operations) • Technical & Specialized Support Services (e.g., E&M engineering, security systems, call centre) • Marketing & Media Operations (e.g., advertising & production) The Applicant has recorded and is foreseeing a continuous downturn in occupancy rate. Based on the existing committed Tenancy Agreements, the former, current and committed/projected occupancy profile is set out as follows: • 2023: 80% • 2024: 75% • 2025: 72% • 2026 (Current): 74% • 2027 (Projected): 64% • 2028 (Projected): 56% • 2029 (Projected): 52%
<u>Building Height</u> With reference to the additional information provided on 31.7.2026 in response to our comments provided on 30.7.2026 from building height and visual perspective, please find our UD&L's further comments below. 13. Upon further checking against the photomontages with the detailed building block layout plan, it is noted a tiny portion of the rooftop structure of Tower 1A (at 131mPD) would still encroach onto the	Noting the principle of not to encroach onto the 20% Building Free Zone unless the proposed building would overlap with an existing building in the background (referring to Manhattan Plan in this case).

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Comments	Response
20% Building Free Zone (BFZ) and a tiny portion of the main roof of Tower 2A (at 136.45mPD) still not overlapping with the existing Manhattan Place in the background and likely encroach onto the 20% BFZ. In view of this, we maintain our reservation on the proposed scheme for ridgeline preservation purpose. The applicant should further refine the scheme to avoid such encroachments. 14. Subject to the above, we have no comment regarding applicant’s suggestion to impose the approval condition set out below: • <i>The submission of a refined building height profile including roof-top structures, keeping the building height below the 20% building free zone of the ridgeline to the satisfaction of the Director of Planning or of the TPB.</i>	At this early design stage, without the benefit to align the modelling files to ascertain the “tiny portion” in the photomontage with extreme delicacy, the Applicant agrees to refine the Proposed Development Scheme to ensure the aforementioned principle. As reflected in the updated architectural drawings in <i>Appendix I</i>, the height of a small portion of Tower 2A shall remain at not more than +126mPD. This would result in refining the layout and footprint of about 3 topmost floors. There could be various ways in making up the GFA and/or to adjust the building disposition/layout/design (including the tiny portion of the rooftop structure of Tower 1A) to respect the aforementioned principle and these will be carefully reflected in the GBP submission stage. Noted. This should ensure PlanD and/or TPB will have the final control over the building height and disposition of the proposed building to ensure no encroachment onto the 20% Building Free Zone unless the proposed building would overlap with an existing building in the background (referring to Manhattan Plan in this case) at the detail design/GBP submission stage.
<u>Comments from Energising Kowloon East Office:</u> (Contact Person: Mr Li Wai-kit; Tel: 3904 1364) The proposed redevelopment will inevitably lead to actual loss of the projected commercial GFA in Kowloon East (KE), which is not in line with the policy objective of ensuring a steady supply of the commercial (including office) floor space in KE under the Energizing Kowloon East	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

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Comments	Response
(EKE) initiatives, especially that the subject site is zoned “C” zone on the Outline Zoning Plan. Besides, the proposed demolition of the existing building, which was constructed only in the 2010s, may set an undesirable precedent of demolishing newly redeveloped commercial uses for turning into other uses in KE within short period of time. This is also contrary to EKE’s policy objective of promoting environmental sustainability. We trust the Town Planning Board will assess the application in balancing other important factors, such as demand for additional housing supply in the area; lot owner/developer’s initiation with reference to the current market situation, and technical feasibility including compatibility of the proposed residential use with the surroundings, etc. based on the advice from other concerned government bureaux /departments.	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 sceptical. Therefore, redeveloping the existing building for a residential development seem to be more viable. 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.
<u>Comments from Transport Department:</u> (Contact Person: Mr Alvin CHAN; Tel: 2399 2772) TEK’s comment: General comments on the Supporting Planning Statement 1. 3.2.6 & 4.6.2 - Please advise the specific hours which this passage to be made available for public to pass through.	This public passage will be opened to the public 12 hours a day, say 8am to 8pm, subject to confirmation at the lease modification stage.

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Comments	Response
- As this passage will not be a 24-hour public access, its nature is just similar to the general internal road within a private lot. 2. 4.12.1 to 4.12.3 - As per the RtC, the applicant advised that the right-turn lane at Cheung Yip Street N/B to Lam Chak Street will not be considered in this planning application. Therefore, we believe the applicant had reviewed and confirmed this provision is not required to cope with the development of 8 Lam Chak Street. Specific comments on Appendix III: Traffic Impact Assessment 3. Table 2.1 & 2.2 - Justification is required to support the statement on "Tower 1A and Tower 1B (or Tower 2A and Tower 2B) are considered as one tower". As per the RtC, Tower 1A and Tower 1B (or Tower 2A and Tower 2B) share the same corridor, MOE stairs, fireman's lift, refuse room and other essential provisions at the typical floor level. In this connection, please indicate the quoted provisions on a typical floor plan to show the share-use nature for the sub-towers. 4. Table 4.3 & 4.4 - According to the Supporting Planning Statement, it is noted that the non-domestic area includes Shop/F&B and also GIC Facilities. Please reflect the latest proposed usage of the development in the traffic assessment.	A general internal road within a private lot will be fenced off and only accessible by the occupants of the private development (particularly the proposed development is predominantly for residential use). Conversely, the proposed passage will be accessible by the public in specified hours and would enhance accessibility towards the waterfront. Noted. Please refer to Figure A in <i>Appendix III</i> for the quoted provisions on the typical floor plan indicating the share-use nature for the sub-towers. The latest proposed uses of the development, including Shop/F&B and GIC Facilities have been reflected in the traffic assessment. As shown in Table 4.4, separating the small-scale GIC uses from Shop/F&B would only result in minimal increase in trips and will not

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Comments	Response
TOK’s comment: Traffic Impact Assessment Report 1. Table 6.5 and 6.10 and para 6.4.5 - Among Stops B, C, E and F, please explain the reason why Stop C are closer to the proposed development but has a lower percentage of estimated boarding passenger from the proposed development as compare to the other Stops. 2. Table 6.11, para 6.4.10 and 7.1.7 - The assessment in Table 6.11 is based on the no. bus/minibus trips, please clarify if the proposed addition of 2 buses and 8 minibuses are representing vehicular trips per hour instead of no. of vehicles. 3. Figure 2.2 (Rev A) - Please advise the walking route for passengers travelling between Stop B/C/D and the proposed development, i.e. whether they can access the proposed development from Cheung Yip Street directly. If not, please consider if an in/out access shall be arranged for the convenience of passengers and/or residents. <u>Comments from UD, Planning Department:</u> (Contact Person: Ms Silvia CHAN; Tel: 3565 3944)	result in any changes to the junction performances. Not least, the overall conclusion (i.e. reduce traffic to the nearby road network) remains unchanged. Please note that the percentage of estimated boarding passenger from the proposed development has been reviewed and revised. The no. of boarding passengers from the proposed development remains very similar, the revision only involves reshuffling the distributions. Please refer to Chapter 6 of the TIA report in <i>Appendix III</i> for detail. Noted, the relevant texts have been revised. Please refer to Table 6.11, para 6.4.10 and 7.1.7 of the TIA report in <i>Appendix III</i> for detail. Please refer to Figure 6.1 of the TIA report in <i>Appendix III</i> for the walking route for passengers travelling between Stop B/C/D and the proposed development. Please be advised that pedestrian access from Cheung Yip Street will be considered at detailed design stage.

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Comments	Response
3. The applicant is reminded to revise all photomontages in the VIA to reflect the latest scheme under this FI submission and to ensure accuracy of the planned/committed developments as shown on the photomontages. For example: 3.1 VP5 - the planned development at Site 3E2, with a proposed building height (BH) of 107mPD, appears to be too tall. It should not be of the same height as the proposed development. Besides, the block of the planned New Acute Hospital (should now be named Kai Tak Hospital) located behind the Training & Research Tower of Hong Kong Children’s Hospital seems to be wrongly located and should be removed; and 3.2 VP6 - the building blocks of the planned developments along Kai Hing Road and at Sites 3E1 and 3E2 appear to be excessive. The proposed development should not be completely screened off by the developments along Kai Hing Road. 4. We would reiterate that the subject application is for a “Proposed Composite Development” instead of a pure residential development. To align with the Planning Statement, relevant sections of the VIA (e.g. Paras. 2.1.1, 2.1.3, 2.1.6, 4.2.1) should be revised from “Residential Development” to “Composite Development”. 5. Table 7.1 – the overall ratings of visual impact for VP2 and VP6 are inconsistent with the analysis of visual change for the two VPs in Paras. 6.3.3 and 6.7.3.	Noted, relevant texts have been updated (<i>Appendix IV</i> refers). Noted, relevant sections have been updated (<i>Appendix IV</i> refers).

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Consolidated by: **KTA Planning Limited**

Date: **14 August 2026**

List of Appendices

- Appendix I Updated Architectural Drawings
- Appendix II Updated Landscape Drawings
- Appendix III Replacement Pages of the Traffic Impact Assessment
- Appendix IV Replacement Pages of the Visual Impact Assessment
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