

28 August 2025

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

By Hand and by Email

Dear Sir


**Section 16 Planning Application for Proposed Shop and Services (Convenience Store) in
“Residential (Group B)” Zone at 128 Waterloo Road, Kowloon
(G/F (Part) of a Residential Development)
(S16 Planning Application No. A/K7/123)**

Reference is made to the captioned application submitted to the Town Planning Board (the Board) on 8 April 2025. Comments from various Government departments were subsequently received via Kowloon District Planning Office of Planning Department on 27 May 2025, 6 June 2025 and 9 June 2025. To allow sufficient time for preparation of Further Information to address the departmental concerns, the consideration of the planning application was deferred by the Board at its meeting on 4 July 2025.

The Applicant now would like to hereby submit this set of Further Information to reactivate the planning application and to address the received departmental concerns. Should there be no further departmental comments received, the Applicant sincerely requests the planning application to be considered by the Board at the soonest.

Should there be any queries, please do not hesitate to contact the undersigned at [REDACTED] or Mr Edison Law at [REDACTED].

Yours faithfully
for Llewelyn-Davies Hong Kong Ltd



Man Ho
Associate Director

MH/el

Encl.

cc
DPO/K

Attn: Ms Vivian Lai / Mr Charles Lee

(by email)

Section 16 Planning Application for Proposed Shop and Services (Convenience Store) in “Residential (Group B)” Zone at 128 Waterloo Road, Kowloon (G/F (Part) of a Residential Development) (Planning Application No. A/K7/123)

	Departmental Comments	Responses to Comments (Aug 2025)
1.	Comments from Transport Department	
	<u>Comments received on 27 May 2025</u>	
1.1	The applicant shall clarify the dimensions in length, width and headroom of the proposed loading/unloading space on the layout plan, which shall be clearly demarcated on the future building plan submissions.	Noted. The parking space with 5m (L) x 2.5m (W) x 2.4m (H) will be provided for van-type light goods vehicles.
1.2	The swept path analysis shall be prepared by a qualified traffic consultant. Further, it appears from the swept path analysis that the maneuvering of the van-type vehicle will clash with existing structures and shall include three point turn movement into the driveway without excessive reversing movement.	<p>After reviewing the comments from various Government department, the Applicant has further updated the location of the drop-off area in mid-July 2025. The proposed drop-off area now situates on common areas of the subject residential development. Swept-path analysis has also been updated accordingly. There would not be any clash with any existing structures. For details, please refer to Attachment 1 – Proposed Drop-off Location (Aug 2025).</p> <p>All previous committed management measures will still be respected for this current proposed drop-off location. The measures include:-</p> <ul style="list-style-type: none"> • The proposed loading / unloading area will be used by van-type light goods vehicles only; • The loading / unloading arrangement can only be made with prior appointment with the management office; • The loading / unloading activities will only be taken place during off-peak hours; • The use of the current proposed designated drop-off area for loading / unloading activities will satisfy fulfils the terms of the Deed of Mutual Covenant and Management Agreement co-signed by the Applicant and the CLP Power Hong Kong Limited. It would not induce any obstruction to the usage of other parking spaces nor right-of-way to the adjacent CLP substation;

	<p><i>Further Comments received on 25 July 2025</i></p> <p>1.3 Presuming the proposal is permissible under the lease, the proposed loading / unloading space will affect the operation of the residential accessible car parking space which is governed by DMC, the applicant shall obtain agreement from the Owners' Committee to ascertain its feasibility and provide written agreement record for consideration.</p>	<ul style="list-style-type: none"> • The usage of the loading / unloading area can be stipulated under the conditions of the tenancy agreement to be signed between the management company and the tenant of the proposed convenience store. The property management company will review the terms and conditions of the tenancy agreement with the tenants on a regular basis. As the agreement is a legal binding document, all signed parties should have self-consciousness to abide by laws based on mutual respect. • Should there be any violation of the agreed terms and conditions of the tenancy agreement, actions can be taken forward by the property management company such as termination of tenancy agreement. Any concerned party (e.g. residents) may also lodge complaints to the property management company. Necessary actions will then be followed, which could include termination of contract if the violation is found to be persisted. • The usage of the current proposed drop-off area will not induce any adverse impact to the surrounding traffic flow nor causes any traffic offenses that requires law enforcement action by the Hong Kong Police Force. <p>On behalf of the subject residential development, the Applicant (i.e. being the developer of the subject residential development) hereby provides an undertaking letter to commit relevant management measures will be carried forward to control the operation of the proposed convenience store (see Attachment 2 – Undertaking Letter). This demonstrates the efforts and commitments made to ensure that there will be no nuisance to all stakeholders and there will be no adverse impact to the surrounding traffic flow.</p> <p>On 11 Aug 2025, the Applicant has kicked start a 2-week consultation process with the residents of the subject residential development. The residents have been well informed about the details of the subject proposal and loading / unloading arrangement. Residents were also invited to provide their views on the proposal. Within the consultation period, no objections from the residents were received. Please see Attachment 3 – Proof of Obtaining Residents' Consent / Comments for reference.</p>
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2.	Comments from Buildings Department	
	<p data-bbox="197 165 654 193"><u>Comments received on 27 May 2025</u></p> <p data-bbox="125 229 506 256">2.1 Object to the application.</p> <p data-bbox="197 293 1093 612">With reference to the approved building plans of the 128 Waterloo Road, the proposed drop-off area which is located at the accessible ramp would adversely affect the provision of approved access route for persons with a disability for the development, especially during the loading and unloading activities being held at the scene. The access route should free from obstruction or any kind of hazards for the persons with a disability to enter, move within and leave a building to reach the accessible facilities. The applicant's attention is drawn to Building (Planning) Regulation 72 and Division 4 of Design Manual: Barrier Free Access 2008 (2024 Edition).</p> <p data-bbox="125 649 1093 836">2.2 The provision of proposed drop-off area which is in close proximity to the exit door / gate on G/F would also obstruct the existing exit route from exit staircases to the ultimate place of safety, especially during loading and unloading activities being held at the scene. A minimum clear width of 1050mm for the exit route should be maintained and all means of escape should be free from obstruction at all times.</p> <p data-bbox="197 873 748 900"><u>Further Comments received on 25 July 2025</u></p> <p data-bbox="125 936 1093 1123">2.3 The revised proposal is considered acceptable provided that the proposed drop-off area and affected accessible carparking space are common areas under the DMC and the use of them is under a common management, and such proposal is agreed by the Owner's Committee. To this end, information to substantiate the above requirements should be submitted for consideration.</p>	<p data-bbox="1120 293 2114 453">After reviewing the comments from various Government department, the Applicant has further updated the location of the drop-off area in mid-July 2025. The proposed drop-off area now situates on common areas of the subject residential development. For details, please refer to Attachment 1 – Proposed Drop-off Location (Aug 2025).</p> <p data-bbox="1120 649 1182 676">Ditto.</p> <p data-bbox="1120 936 1200 963">Noted.</p> <p data-bbox="1120 1000 1715 1027">Please refer to our responses to Item 1.3 above.</p>

3.	Comments from Planning Department	
	<p><u>Comments received on 27 May 2025</u></p> <p>3.1 Para. 2.2.1 – The applicant should, with reference to Para. 2.2.2, provide operation / management details of the existing metal gate, which is proposed to segregate the subject premises from the domestic portion of the development. In particular, arrangements relating to motorcycle parking spaces and goods delivery to the subject premises should be supplemented.</p>	<p>After reviewing the comments from various Government department, the Applicant has further updated the location of the drop-off area in mid-July 2025. The proposed drop-off area now situates on common areas of the subject residential development. (see Attachment 1 – Proposed Drop-off Location).</p> <p>For the metal gate at the separate entrance to the proposed convenience store at Waterloo Road, it will be managed by the management company and it will only be opened during operation hours of the convenience store (i.e. restricted from 7am to 11pm on Mondays to Sundays).</p> <p>For the metal gate segregating the residential portion and the proposed convenience store, it will be closed at all times and it will only be opened by the management company during delivery of goods from the proposed drop-off location. It will also be occasionally for access of the motorcycle parking and maintenance access to CLP substation when needed.</p>
	<p><u>Further Comments received on 25 July 2025</u></p> <p>3.2 Substantiate the proposed management measures, in particular to address potential conflicts between the usage of the proposed drop-off area and existing accessible parking space. Information such as (i) proposed time and duration for loading/unloading activities; (ii) usage rate of the existing accessible parking space; and (iii) actions to be performed by the management office staff to facilitate loading/unloading activities are relevant;</p>	<p>i. Delivery of goods will now make use of the run-in / out at Waterloo Road, instead of using the run-in / out at Boundary Street. The delivery of goods can only be made with prior appointment with the property management company of the residential development. The delivery of goods will not be allowed during peak hour (i.e. from 7am to 10am on Mondays to Fridays); nor in the evening as well as outside the operation hours of the convenience store so that to minimise any possible nuisance with residents;</p> <p>ii. Considering that the scale and nature of the proposed convenience store is relatively small and to serve the local community with some basic essential goods, the trips for delivery of goods will be infrequent. It is estimated that the trips made for delivery of goods will not be more than 2-3 times a week and each L/UL session will not last for more than 30 minutes;</p> <p>iii. According to the information from the existing property management company, the usage rate of the existing accessible parking space is very low. By observation, the usage rate of this accessible parking space at present is fairly low (i.e. about once in 2-3 weeks). Also, although the accessible parking space is a residential common area, prior appointment with the management staff is required before actual usage by the residents;</p>

3.	Comments from Planning Department (Con't)	
3.2	(Con't)	<p>iv. Since delivery of goods can only be made with prior appointment with the property management company, there will be staff assigned to guide the van-type light goods vehicle entering the premises from Waterloo Road to the proposed drop-off area. After that, the staff will also guide the delivery of goods to the proposed convenience store to ensure that there will be no disruption to the domestic portion of the residential development.</p> <p>In view of the low usage rate of the existing accessible parking space and the abovementioned management measures, possible nuisance caused by the proposed drop-off and its L/UL activities will be minimised.</p>
3.3	Indicate the goods delivery route between the proposed drop-off area and the application premises, and elaborate on the actions to be performed by the management office staff to facilitate goods delivery (including the operation of the existing metal gate(s) outside the application premises);	Please see responses-to-comments of 3.2 above.
3.4	Noting that both the existing accessible parking space and loading / unloading bay of the residential development are designated as 'residential common areas' under the DMC, please elaborate on the reasons for not using the existing loading / unloading bay for temporary loading/unloading activities to serve the proposed use;	<p>There is existing another loading / unloading area designated as "residential common areas" situated next to car park no. 6. It is situated right opposite to the residents' lift lobby, and so it is frequently used for daily drop-off activities of the residents, such as taxis' drop-off and pick-up.</p> <p>Instead, the existing accessible parking space (i.e. "V1(D)") is situated at a relatively farer location. By observation, the usage rate of this accessible parking space at present is fairly low (i.e. about once in 2-3 weeks).</p> <p>Therefore, the current proposal is considered to be optimal after exploring all possible ways to minimise disruptions / nuisance to the residents.</p>
3.5	Riding on point 3 above, please elaborate on the reasons for not using other existing parking spaces designated as 'residential common areas' under the DMC for temporary loading/unloading activities to serve the proposed use; and	Other car parking spaces designated as "residential common areas" are mainly visitor car parking spaces situated right next to the run-in / out at Waterloo Road along the right-of-way to the CLP substation. To minimise any possible impact due to delivery of goods or manoeuvring of the van-type light goods vehicles (such as tailing back of queuing traffic back to Waterloo Road during drop-off activities), it is considered not desirable to make use of these parking spaces.
3.6	Provide the dimensions of the drop-off area on plan.	Please see Attachment 1 – Proposed Drop-off Location and responses to comments of Item 1.1 above.

4.	Comments from Commissioner of Police	
	<u>Comments received on 27 May 2025</u>	
4.1	To facilitate the loading/ unloading activities for the convenience store, it is strongly recommend to set up the L/UL area inside the premises;	Under the current proposal, the proposed drop-off is situated within the subject premises. Please see Attachment 1 – Proposed Drop-off Location (Aug 2025) . Noted.
4.2	If further road works or road closure for decoration is required, the office could furnish HKPF (Attn.: OC RMO KW) a set of temporary traffic arrangement (TTA) plans in order to facilitate our further assessment.	

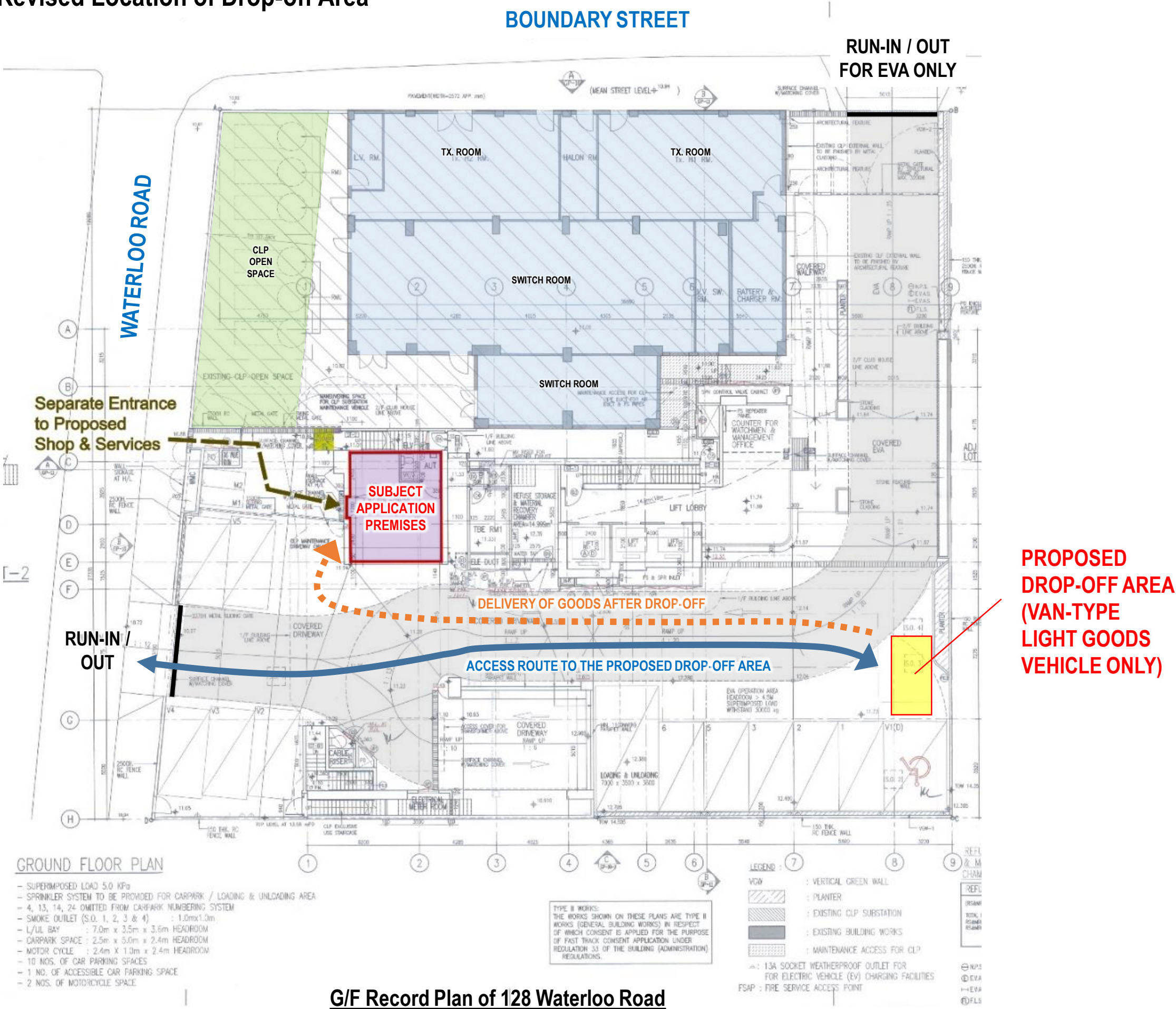
Below Government departments have no comment / no objection on the subject S16 planning application:

1. FSD
2. LandsD
3. WSD
4. HyD
5. EPD
6. FEHD
7. DSD
8. DO

Attachment 1

Proposed Drop-off Location (Aug 2025)

Attachment 1 - Revised Location of Drop-off Area

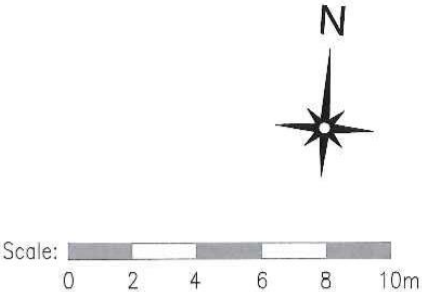


G/F Record Plan of 128 Waterloo Road

Attachment 1 - Revised Location of Drop-off Area

KOWLOON INLAND LOT NO.1900
LEGEND FOR SDMC PLANS

-  YELLOW - PHASE COMMON AREAS
-  YELLOW HATCHED BLACK - RIGHT OF WAY AREA
-  YELLOW CROSS-HATCHED BLACK - PHASE COMMON AREAS
-  YELLOW CROSS-HATCHED BLACK STIPPLED BLACK - PHASE COMMON AREAS (COVERED LANDSCAPED AREA)
-  YELLOW STIPPLED BLACK - PHASE COMMON AREAS (COVERED LANDSCAPED AREA)
-  ORANGE - RESIDENTIAL COMMON AREAS
-  ORANGE CROSS-HATCHED BLACK - RESIDENTIAL COMMON AREAS (GREENERY AREAS) G/F=11.467 sqm
-  ORANGE DOTTED LINE - RESIDENTIAL COMMON AREAS (VERTICAL GREENERY) G/F=43.054 sqm
-  BROWN - CAR PARK COMMON AREAS
-  VIOLET - TUTORIAL SCHOOL
-  RED - SIGNAGE AREAS (TUTORIAL SCHOOL)

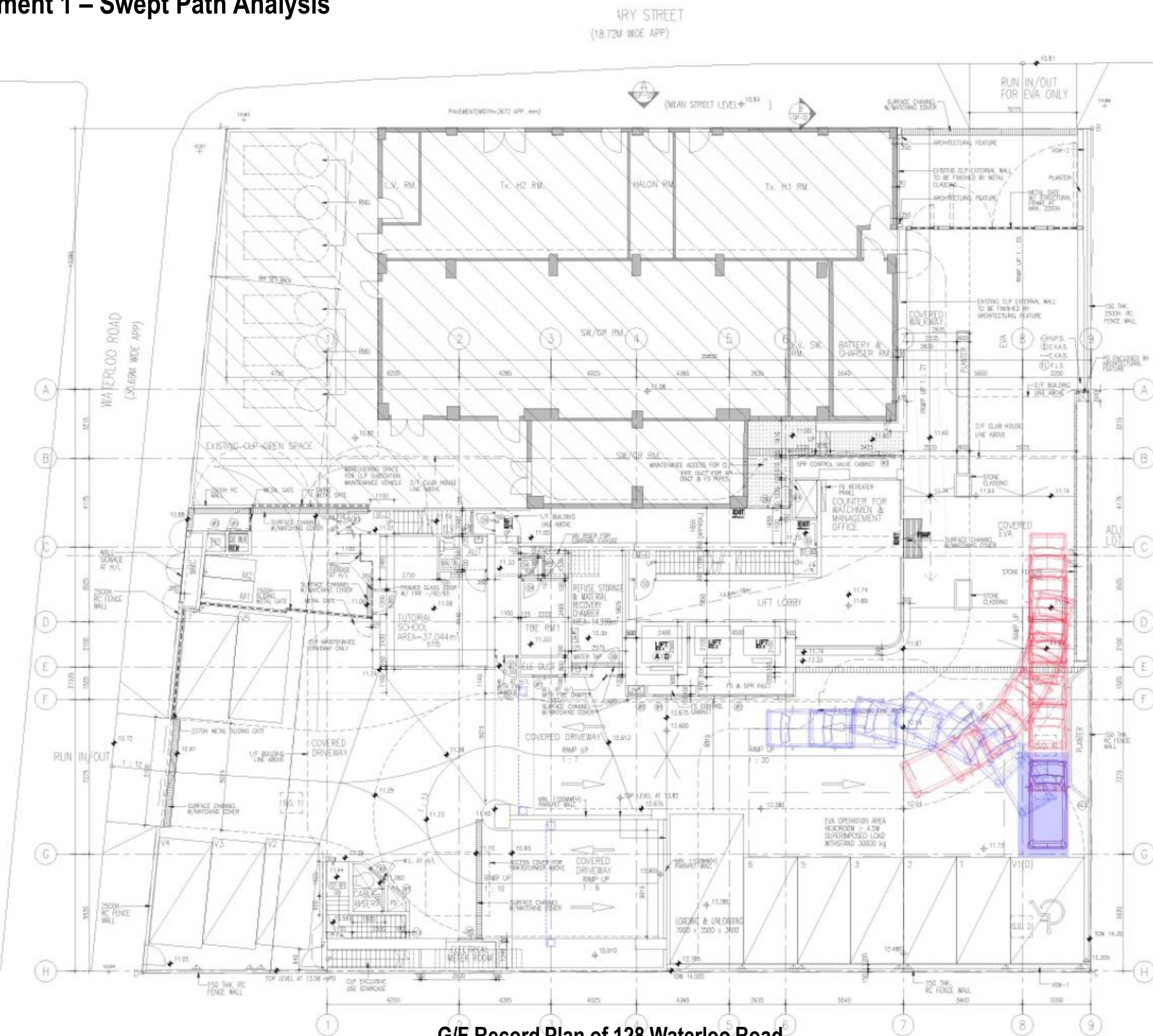


1. The current proposed drop-off area is situated on "Residential Common Areas" under the DMC;
2. Similar to the visitor accessible parking space [i.e. V1(D)], the usage of these two spaces can only be made with prior appointment with the property management office. Hence, no conflict between the uses of these spaces is expected;
3. The terms of usage of the proposed drop-off area for loading / unloading activities will be stipulated under the conditions of the tenancy agreement to be signed between the management company and the tenant of the proposed convenience store.

GROUND FLOOR PLAN
SDMC PLAN
DATE : 30-11-2021

WAI CHING PONG
AUTHORIZED PERSON

Attachment 1 – Swept Path Analysis



G/F Record Plan of 128 Waterloo Road

Attachment 2

Undertaking Letter

Great Prosper Development Limited

Our Ref: 128W/L/19305

Date: 13 August 2025

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

Dear Sir

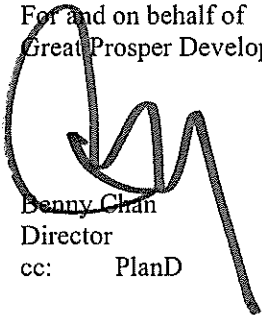
Re: Section 16 Planning Application for Proposed Shop and Services (Convenience Store) in “Residential (Group B)” Zone at 128 Waterloo Road, Kowloon (G/F (Part) of a Residential Development)
(S16 Planning Application No. A/K7/123)
Undertaking for Implementation of Management Measures

We, Great Prosper Development Limited, being the Applicant (i.e. developer of the captioned development), hereby undertake the following for implementing the management measures as committed under the subject planning application to manage the future tenants of the subject proposed convenience store.

1. The operation hours of the proposed convenient store will be restricted from 7am to 11pm on Mondays to Sundays;
2. There will only be one staff to serve the proposed convenient store. The staff will be restricted from accessing the domestic portion of the subject residential development;
3. There will be an exclusive access at Waterloo Road for customers, which serves to separate all customers away from the domestic portion;
4. Delivery of goods will only be taken place at the designated drop-off area;
5. The delivery of good will be limited to “van-type light goods vehicles”. Prior appointment with the management office will be required. The drop-off time will only be happened during off-peak hours;
6. The metal gate segregating the residential portion and the “proposed convenient store” will be closed at all times and it will only be opened by the management company during the time when needed;
7. The binding terms to control operation of the proposed convenient store will be stipulated under the tenancy agreement of the convenience store as well as the management agreement of the Management Company; and
8. Should there be any violation of terms, actions can be taken forward by the property management company such as termination of tenancy agreement.

Thank you for your attention.

Yours faithfully
For and on behalf of
Great Prosper Development Limited



Benny Chan
Director

cc: PlanD

Attn.: Ms. LAI Man Foon, Vivian

(Email: vmflai@pland.gov.hk)

Attachment 3

Proof of Obtaining Residents' Consent / Comments

檔案編號：MGT-128W-SITE/017/2025

致：128WATERLOO 各業戶

有關規劃申請通知：

1. 規劃申請更進事項

管理處接獲「瀋隆發展有限公司」(Great Prosper Development Limited) 來函，誠邀各位業主就一項涉及本屋苑的規劃申請更進事項提供意見。

就有關早前規劃申請編號 A/K7/123 擬議將九龍窩打老道 128 號地下(部分)學校(補習學校)更改為商店及服務行業申請，此申請為提供便利店服務，令附近居民便利。現就申請內的短暫上落貨區，建議以不佔用訪客車車位情況下，將短暫上落貨區設置於 V1(D)車位前空地。

此變動可能影響部分業主及訪客使用訪客車車位 V1(D)，因此避免影響將來訪客使用 V1(D)車位，有關安排使用守則將會與租客以租賃協議監管，特此提醒關注。

2. 主要內容

在擬議商店及服務行業申請中，將短暫上落貨區設置於 V1(D)車位前空地。

3. 業主意見提交指引

如對上述規劃申請更進事項有任何意見，請依以下程序提交：

領取表格：親臨地下大堂服務處索取《意見表》。

填寫遞交：填妥後請於 2025 年 8 月 25 日 (星期一) 下午 5 時前交回地下大堂服務。

4. 查詢事宜

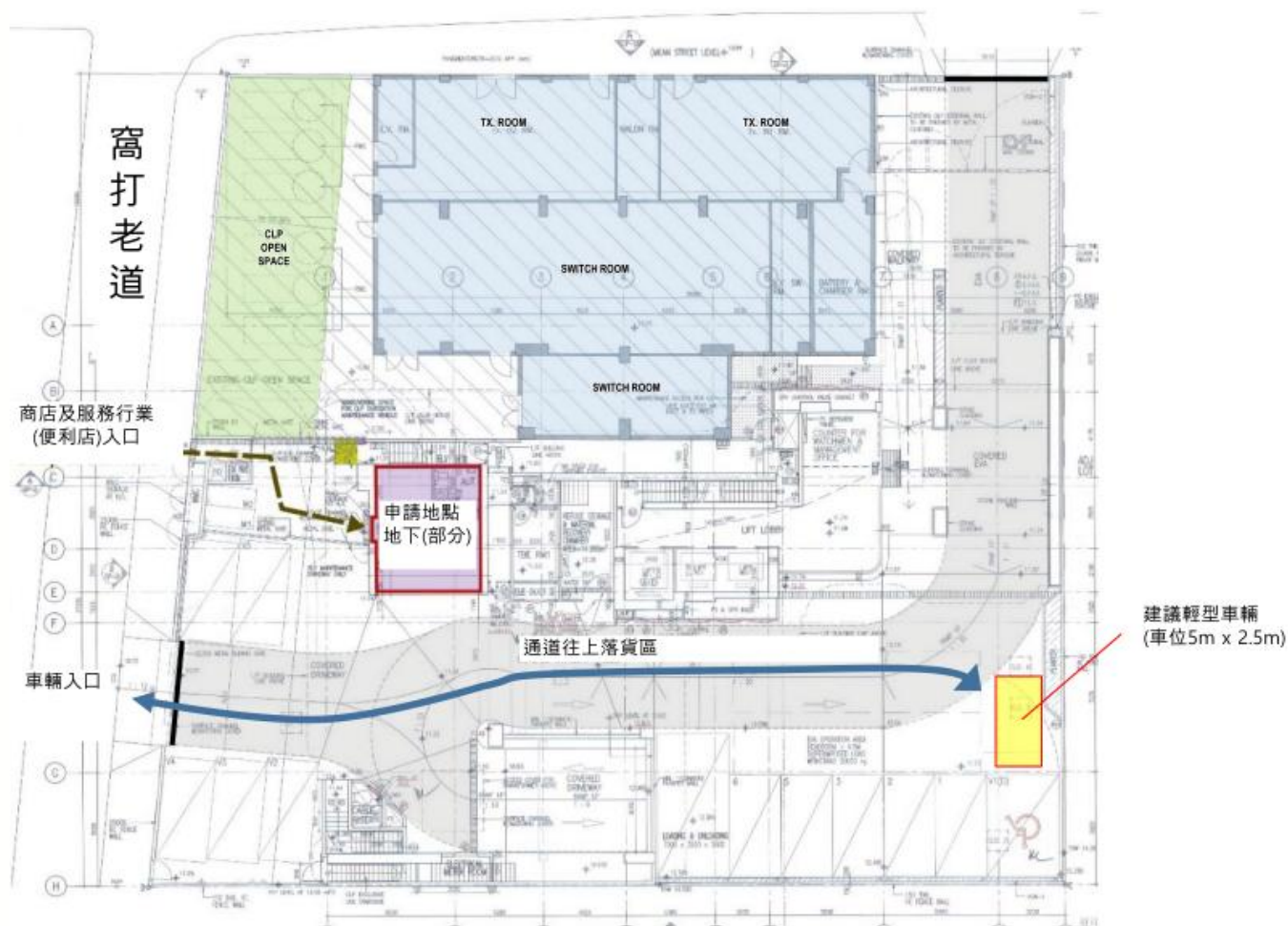
如有任何查詢，可與本處聯絡。

有關申請亦可查詢政府城規會網站 www.tpb.gov.hk

所有意見將由發展商統一整理後提交當局審核。

(附圖如下：)

界限街



地下平面圖

128 WATERLOO 管理處
二零二五年八月十一日

仲量聯行物業管理有限公司
香港英皇道 979 號多盛大廈 17 樓
地產代理公司牌照號碼: C-006182
物業管理公司牌照號碼: C-480364

Jones Lang LaSalle Management Services Limited
17/F Dorset House 979 King's Road Hong Kong
EAA Company Licence No.: C-006182
PMC Licence No.: C-480364

Our quality assurance accreditation
ISO 9001 Quality Management System
ISO 14001 Environmental Management System
ISO 50001 Energy Management System
ISO 45001 Occupational Health and Safety Management System

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F +852 2968 1668
Wjll.com.hk

規劃申請更進事項意見表
(關於申請編號：A/K7/123)

業主基本資料

1. 姓名：_____

2. 單位：_____

3. 聯絡電話：_____

意見類別 (請勾選 ✓)

- ☐ 支持 該規劃申請
- ☐ 反對 該規劃申請
- ☐ 其他意見／關注事項

填寫遞交：填妥後請於 2025 年 8 月 25 日 (星期一) 下午 5 時前
交回地下大堂服務處。