



Our Ref. No.: URA260809306

4 September 2026

By Hand & By Email

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

Dear Sir/Madam,

**Section 16 Planning Application for Proposed Minor Relaxation of Building Height
Restriction for the Urban Renewal Authority
To Kwa Wan Road/ Wing Kwong Street Development Scheme ("KC-016")
Planning Application No. A/K9/289
- Submission of Response-to-Departmental Comments -**

We refer to the captioned s.16 planning application submitted to the Town Planning Board (TPB) on 8 July 2026.

To address the departmental comments received via the Kowloon District Planning Office, Planning Department (KDPO, PlanD) in July and August 2026, we submit herewith the Responses to Departmental Comments table (**R to C Table**), together with the relevant replacement pages of the Visual Assessment (**Appendix 1**) and replacement pages of the Traffic Review Report (**Appendix 2**) for TPB's consideration.

In addition, in response to the verbal comments from KDPO, PlanD, we would like to provide the following clarifications:

1. Proposed 4m Building Height Increase for Modular Integrated Construction (MiC)

The proposed building height restriction (BHR) increase from 140mPD to 144mPD (+4m or about 2.9%) is to accommodate the adoption of MiC for the residential portion under the notional design of the Current S16 Planning Proposal. The typical residential floor-to-floor height has been adjusted from 3.15m (under the Approved DSP's notional design) to 3.25m (under the Current S16 Planning Proposal) to accommodate the double-slab structural thickness typical of current MiC technology and the established market standards. This proposed 4m building height increase is fully in line with Joint Practice Note (JPN) No. 8 which allows an increase of building height up to 4% of the total storey height of MiC floors.



2. Estimated MiC GFA Exemption under JPN No.8

With the adoption of MiC, 10% of the MiC floor area may be disregarded from calculation of GFA in accordance with JPN No. 8. Under the notional design of the Current S16 Planning Proposal, it is assumed that that 90% of the permissible domestic GFA of 41,062 sq.m. is viable for MiC adoption, taking into account that areas such as corridors, lift lobbies and staircases etc. are not technically feasible to adopt MiC. As such, the estimated domestic GFA to be exempted under JPN No. 8 is about 3,700 sq.m. (i.e. $41,062 \text{ sq.m.} \times 90\% \times 10\% \approx 3,700 \text{ sq.m.}$). The actual GFA exemption will be worked out in detailed design stage subsequent to approval of the subject S16 Planning Application.

3. The Proposed 9-storeys Increase for T2

The proposed 9-storey increase for T2 (from 23 residential storeys under the Approved DSP Proposal to 32 nos. of residential storeys under the Current S16 Planning Proposal) is directly necessitated by the needs to accommodate the abovementioned additional domestic GFA of about 3,700sq.m. (i.e. within 10% MiC floor area to be disregarded from GFA calculation under JPN No. 8). This exempted area requires additional residential storeys. With the proposed BHR of 144mPD, any further vertical expansion of T1 by even a single storey would exceed the BHR, thus the exempted MiC GFA have to be distributed to T2, necessitating the 9-storey increase to fully realize the permissible development intensity.

4. Proposed Average Flat Size

The proposed average flat size under the Current S16 Planning Proposal is about 42.6sq.m., which has taken into account of the abovementioned additional domestic GFA of about 3,700sq.m. (within 10% MiC floor area is allowed to be exempted from GFA calculation under JPN No. 8). Table 3.1 has been updated with the remarks to include the exempted domestic GFA in the proposed average flat size as provided in the replacement pages of the Planning Statement in **Appendix 3**.

5. Notional Block Plan and Section Plans

The Notional Block Plan (Figure 3.1) and Notional Section Plan (Figure 3.2) have been updated to realign the numbering of the labelling of the retained planning gains from Approved DSP and to correct a minor typo, and an additional Section Plan (Figure 3.3) has been provided to illustrate the notional design of the low-rise commercial/ retail block (i.e. the “Low Block”), as provided in the replacement pages of the Planning Statement in **Appendix 3**. The updated Notional Block Plan and Notional Section Plans will supersede those previously included in all technical assessments. This update will not affect the assessments/results of all previous submitted technical assessments.



6. Align the Naming of the Low-Rise Non-Domestic Block and Provide Textual Refinement

Replacement pages for Table 3.1 and Para. 4.5.2 of the Planning Statement have been provided in **Appendix 3** to align the naming of the low-rise non-domestic block at the east of the Application Site as the “Low Block”. In addition, replacement page of Para. 3.3.2 of the Planning Statement have been provided in **Appendix 3** to provide textural refinement for enhanced clarity.

7. District-Based Design Concept for URA Kowloon City Action Area 1 (KCAA1)

In response to verbal comment from KDPO, PlanD, the District-Based Design Concept for URA KCAA1 is provided in **Appendix 4**.

Background of KCAA1

According to the Urban Renewal Plan for Kowloon City (URP) recommended under the District Urban Renewal Forum (DURF) study, an area bounded by Ngan Hon Street, To Kwa Wan Road, Ma Tau Wai Road, Bailey Street, Wan On Street and Sung On Street was identified as a ‘Proposed Redevelopment Priority Area’ in view of the poor building and environmental conditions in the area. Based on the DURF recommendations, this area forms URA’s Kowloon City Action Area 1 (KCAA1), which aims to improve living environment of the old urban district through holistic planning under a “planning-led” and “district-based” urban renewal approach. KCAA1 comprises 8 URA redevelopment projects, of which the Application Site under the subject S16 Planning Application (KC-016) forms an integral part. It will generate synergies with the other 7 adjoining URA redevelopment projects in establishing a prominent social hub within the district. To enhance connectivity and walkability in the district, KCAA1 can serve to strengthen the linkages from inland to harbourfront, by connecting with To Kwa Wan MTR Station to the west and the harbourfront area to the east, and echoing URA’s planning vision of creating the “Victoria Cove Area”.

Stepped-height Profile

KCAA1 adopts a holistic planning approach across its eight redevelopment projects, guided by an overarching master design control to create an accessible, livable, and vibrant ‘District-Based Redevelopment New Community.’ The BHR profile is systematically planned to step down harmoniously from KC-016, positioned as the landmark gateway to KCAA1 from To Kwa Wan MTR Station with proposed BHR of 144mPD, towards the remaining KCAA1 developments at 100mPD, reinforcing the established stepped height profile descending from the inland core toward the eastern waterfront.

Enhanced Walkability and Accessibility

With an aim to enhance the overall walkability and accessibility of the area, existing roads including Hung Fook Street and the eastern section of Kai Ming Street will be pedestrianized, together with the new pedestrian street intersecting Hung Fook Street in KC-010 and DL-8:KC & KC-011 and the new pedestrian street in KC-014, to form an extensive pedestrian area with provision of appropriate greenery to create a pleasant pedestrian environment. This pedestrian area will connect with the all-weathered communal space in KC-016 and the landscaped area



/recreational space within KC-012 & KC-013, forming a connected neighbourhood. With the proposed footbridge in KC-016 that connects KCAA1 with exit of To Kwa Wan MTR station, the district's connectivity with public transport networks, inland areas, and the waterfront would be enhanced. Furthermore, potential setbacks will be provided to create wider and walkable streets.

Enhanced Vehicular Traffic Network

Vehicular traffic flow within KCAA1 will also be enhanced through restructuring of the road network by replacing dead-end detours with a new vehicular road extending from Wan On Street to Wing Kwong Street; then further connect to Kai Ming Street. The restructured road network allows vehicles to travel directly from Wan On Street to Ma Tau Wai Road via Wing Kwong Street; and from Wan On Street to Kai Ming Street. Meanwhile, a shared parking facilities will be provided in KC-010 to serve six KCAA1 projects to reduce vehicular run-ins/outs, minimize potential traffic conflicts, and maintain street vibrancy.

8. Adopted Ancillary Carparking Provision Standard

The ancillary carparking provision under current S16 Planning Proposal adheres to the parking ratios as adopted in the draft Land Grant and agreed by TD. It is the same parking ratios proposed in the TIA of the approved DSP, which has adopted the high-end parking standards under the HKPSG. The reduced number of ancillary parking spaces under the current S 16 Planning Proposal is a result of different flat mix (with more smaller flats) proposed in the current S16 Planning Proposal which has taken into account of the latest market demand. The final design scheme, flat number and flat mix as well as actual provision of car parking spaces will be determined during the detailed design stage subject to the agreement with the relevant Government departments.

Furthermore, the Application Site forms an integral part of KCAA1 comprising eight URA projects. Over 600 parking spaces will be provided within KCAA1, with about 500 being ancillary parking spaces and the remaining as public parking spaces. Collectively, these parking facilities in can address the local parking demands and relieve traffic pressure.

9. Response to Public Comments

The URA's response to the public comments received during the publication period is provided in **Appendix 5**.



Should you have any enquiry, please feel free to contact me at [REDACTED] or our Ms. Mable Kwan at [REDACTED] / Ms. Simone Tang at [REDACTED] Ms. Kelly Lin at [REDACTED]. Thank you.

Yours faithfully,

Mike Kwan
General Manager, Planning & Design
Urban Renewal Authority

encl.

cc. DPO/Kln, PlanD (Attn: Ms. Vivian Lai, Ms. Vicki Au and Mr. Ryan Kwok)