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	Date Received 收到日期	

- The representation should be made to the Town Planning Board (the Board) before the expiry of the specified plan exhibition period. The completed form and supporting documents (if any) should be sent to the Secretary, Town Planning Board, 15/F, North Point Government Offices, 333 Java Road, North Point, Hong Kong.  
申述必須於指定的圖則展示期限屆滿前向城市規劃委員會（下稱「委員會」）提出，填妥的表格及支持有關申述的文件（倘有），必須送交香港北角渣華道 333 號北角政府合署 15 樓城市規劃委員會秘書收。
- Please read the "Town Planning Board Guidelines on Submission and Processing of Representations and Further Representations" before you fill in this form. The Guidelines can be obtained from the Secretariat of the Board (15/F., North Point Government Offices, 333 Java Road, North Point, Hong Kong – Tel.: 2231 4810 or 2231 4835) and the Planning Enquiry Counters (PECs) of the Planning Department (Hotline: 2231 5000) (17/F., North Point Government Offices, 333 Java Road, North Point, Hong Kong and 14/F., Sha Tin Government Offices, 1 Sheung Wo Che Road, Sha Tin, New Territories), or downloaded from the Board's website at <http://www.tpb.gov.hk/>.  
填寫此表格之前，請先細閱有關「根據城市規劃條例提交及處理申述及進一步申述」的城市規劃委員會規劃指引。這份指引可向委員會秘書處（香港北角渣華道 333 號北角政府合署 15 樓 - 電話：2231 4810 或 2231 4835 及規劃署的規劃資料查詢處（熱線：2231 5000）（香港北角渣華道 333 號北角政府合署 17 樓及新界沙田上禾輦路 1 號沙田政府合署 14 樓）索取，亦可從委員會的網頁下載（網址：<http://www.tpb.gov.hk/>）。
- This form can be downloaded from the Board's website, and obtained from the Secretariat of the Board and the PECs of the Planning Department. The form should be typed or completed in block letters, preferably in both English and Chinese. The representation may be treated as not having been made if the required information is not provided.  
此表格可從委員會的網頁下載，亦可向委員會秘書處及規劃署的規劃資料查詢處索取。提出申述的人士須以打印方式或以正楷填寫表格，填寫的資料宜中英文兼備。倘若未能提供所需資料，則委員會可把有關申述視為不曾提出論。
- In accordance with the Town Planning Ordinance (the Ordinance), the Board will make available all representations received for public inspection as soon as reasonably practicable at the Board's website and the PECs. The representations will be available for public inspection until the Chief Executive in Council has made a decision on the plan in question under section 9 of the Ordinance.  
根據《城市規劃條例》（下稱「條例」），委員會會在合理地切實可行的情況下，盡快將所有收到的申述上載至委員會的網頁及存放於規劃資料查詢處供公眾查閱，直至行政長官會同行政會議根據條例第 9 條就有關圖則作出決定為止。

<p><b>1. Person Making this Representation (known as "Representer" hereafter)</b> <b>提出此宗申述的人士（下稱「申述人」）</b></p> <p>Full Name 姓名 / 名稱 (<del>Mr./Ms.</del>/Company/<del>Organization</del>* 先生/女士/公司/機構*) Hostford Development Company Limited</p> <p>(Note: for submission by person, full name shown on Hong Kong Identity card/Passport must be provided) (注意：若個人提交，須填上與香港身份證／護照所載的全名)</p>
<p><b>2. Authorized Agent (if applicable) 獲授權代理人(如適用)</b></p> <p>Full Name 姓名 / 名稱 (<del>Mr./Ms.</del>/Company/<del>Organization</del>* 先生/女士/公司/機構*) Masterplan Limited</p> <p>(Note: for submission by person, full name shown on Hong Kong Identity card/Passport must be provided) (注意：若個人提交，須填上與香港身份證／護照所載的全名)</p>

\* Delete as appropriate 請刪去不適用者

Please fill in "NA" for not applicable item 請在不適用的項目填寫「不適用」

<b>3. Details of the Representation (use separate sheet if necessary)<sup>#</sup></b> <b>申述詳情(如有需要，請另頁說明)<sup>#</sup></b>		
The plan to which the representation relates (please specify the name and number of the plan) 與申述相關的圖則 (請註明圖則名稱及編號)		Wan Chai Outline Zoning Plan No.S/H5/32
<b>Nature of and reasons for the representation 申述的性質及理由</b>		
Subject matters 有關事項 <sup>@</sup>	Are you supporting or opposing the subject matter? 你支持還是反對有關事項?	Reasons 理由 <sup>^</sup>
Amendment Items A and B1	<input type="checkbox"/> support 支持 <input checked="" type="checkbox"/> oppose 反對	Please refer to the enclosed Representation Statement
	<input type="checkbox"/> support 支持 <input type="checkbox"/> oppose 反對	
	<input type="checkbox"/> support 支持 <input type="checkbox"/> oppose 反對	
Any proposed amendments to the plan? If yes, please specify the details. 對圖則是否有任何擬議修訂? 如有的話，請註明詳情。  Please refer to the enclosed Representation Statement		

<sup>#</sup> If the representation contains more than 20 pages, or any page larger than A4 size, 4 hard copies and 1 soft copy are required to be provided for the submission. Provision of email address is also required.

若申述超過 20 頁或有任何一頁大小超過 A4，則須提交硬複本一式四份和一份軟複本。另須提供電郵地址。

<sup>@</sup> Please describe the particular matter in the plan to which the representation relates. Where the representation relates to an amendment to a plan, please specify the amendment item number provided in the Schedule of Proposed Amendments. 請形容圖則內與申述有關的指定事項，如申述與圖則的修訂有關，請註明在修訂項目附表內的修訂項目編號。

<sup>^</sup> Please also note that section 6(3A) of the Ordinance provides that any representation received under section 6(1) may be treated as not having been made if, in the opinion of the Board that, the reason for the representation is a reason concerning compensation or assistance relating to, or arising from resumption/acquisition/clearance/obtaining vacant possession of any land by the Government. The above matters should be dealt with in accordance with the relevant statutory provisions on compensation and/or promulgated policy on compensation. Should you have any views on compensation or assistance matters, you may separately raise your views to the Director of Lands or the relevant authority. 請注意，條例第 6(3A)條訂明，如委員會認為根據第 6(1)條收到的任何申述所提出的理由是與政府收回／徵用／清理／取得任何土地的空置管有權而引起的補償或援助有關，則有關申述可被視為不曾提出。上述事項應該按照相關補償的法律條文和／或已公布的補償政策處理。如對補償或援助事宜有意見，可另行向地政總署署長或有關當局提出。

Please fill "NA" for not applicable item 請在不適用的項目填寫「不適用」

☒ at the appropriate box 請在適當的方格內加上 ☒ 號

**Representation**  
**to**  
**Draft Wan Chai Outline Zoning Plan No.S/H5/32**

**Submitted by**  
**Hostford Development Company Limited**

**Representation Statement**

**Prepared by**  
**Masterplan Limited**

**August 2025**

## **1. Introduction**

- 1.1 This Representation is made pursuant to Section 6 of the Town Planning Ordinance. It relates to the Draft Wan Chai Outline Zoning Plan No. S/H5/32 ("OZP") gazetted on 27 June 2025. It is prepared by Masterplan Limited, on behalf of Hostford Development Company Limited.

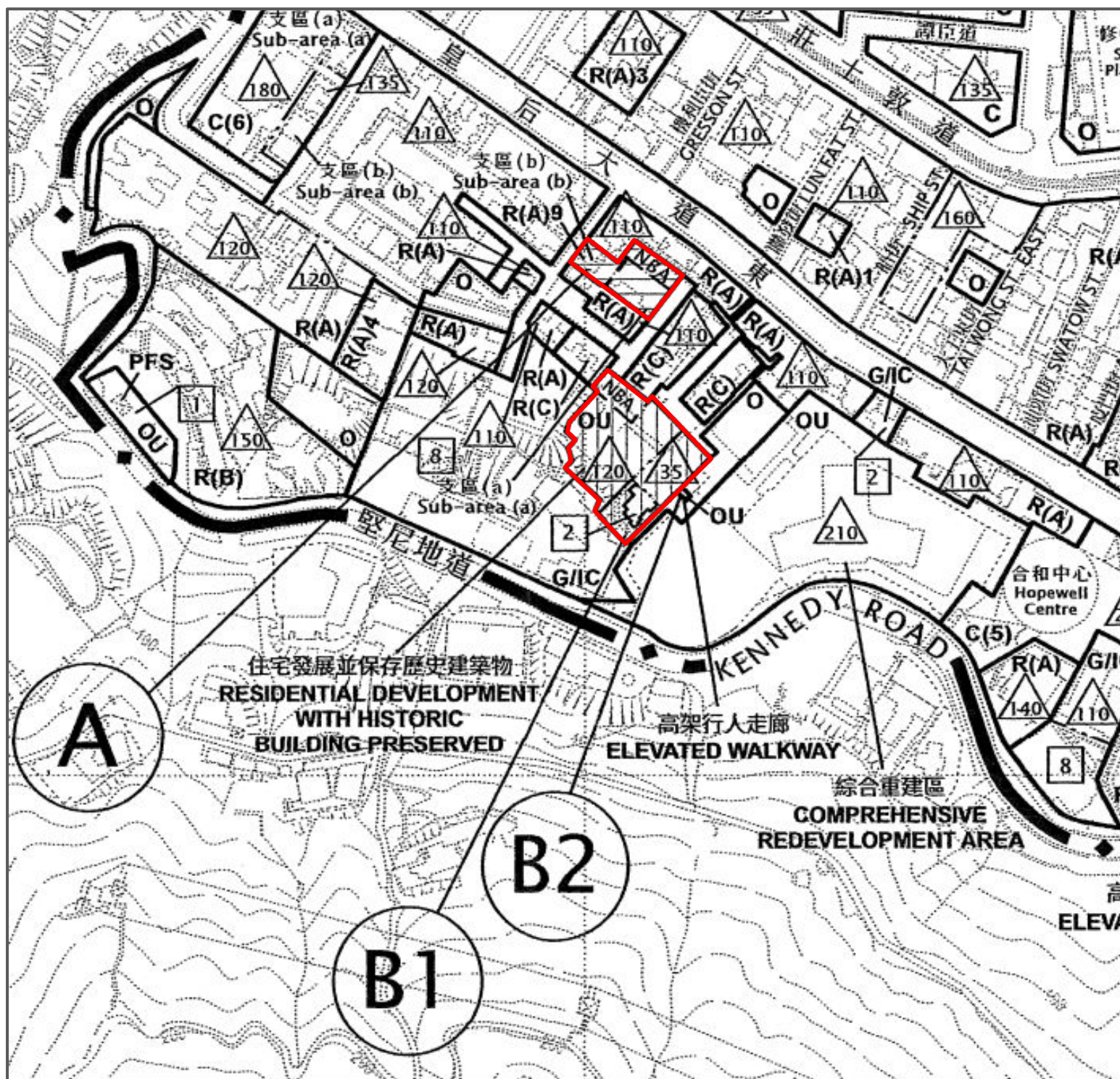
## **2. The Particular Matters in the Draft Plan to which the Representation Relates**

- 2.1 This Representation relates to Amendment Items A and B1 of the Draft OZP which reads as follows, and also their pertinent Notes and Explanatory Statement:

*"Item A – Rezoning of a site at 31-36 Sau Wa Fong and 8-12 St. Francis Street from "Residential (Group A)", "Residential (Group C)", and an area shown as 'Road' to "Residential (Group A)9" with designation of 31-36 Sau Wa Fong as sub-area (a) and 8-12 St. Francis Street as sub-area (b) and the land in the north-eastern portion as non-building area."*

*"Item B1 – Rezoning of a site at 1, 1A, 2 and 3 Hillside Terrace, 55 Ship Street, 1-5 Schooner Street, 53 Ship Street, 18 Sau Wa Fong, Inland Lot 9048 and adjoining Government land from "Comprehensive Development Area", "Residential (Group C)" and an area shown as 'Road' to "Other Specified Uses" annotated "Residential Development with Historic Building Preserved" with stipulation of building height restrictions and designation of the land at the northern corner as non-building area."*

- 2.2 A Location Plan indicating the sites of the two Amendment Items ("Amendment Sites") on an extract of the Draft OZP is provided in **Figure 1**.



**Figure 1.** Location Plan indicating the Sites of Amendment Items A and B1, on an extract of the Draft Wan Chai Outline Zoning Plan No.S/H5/32

#### Legend

- C Commercial
- G/IC Government, Institution or Community
- O Open Space
- OU Other Specified Uses
- R(A) Residential (Group A)
- R(B) Residential (Group B)
- R(C) Residential (Group C)
- 5 Building Height Restriction (In Number of Storeys)
- 120 Building Height Restriction (In mPD)
- Red outline Amendment Sites A and B1

### **3. The Representer**

- 3.1 The Representer, Hostford Development Company Limited, is the owner of the property at No. 3, 5, 7 St. Francis Street and 61 Queen's Road East. The proprietor is a longtime patron of the neighbourhood of the Amendment Sites. He is a day-to-day user of St. Francis Street, witnessing pedestrians including elderly and disabled persons, travelling on the steep and narrow street. This is inconvenient and dangerous, having to negotiate between the crowded pedestrian and vehicular traffic dangerously at times. This Representation, raising concerns on traffic safety and universal access, is made in the interests of the general public.
- 3.2 The Representer has previously also raised concerns on traffic safety and universal access pertinent to the future development of the two Amendment Sites. This was in the form of three rounds of public comment to the Town Planning Board ("TPB") on S12A Application No.Y/H5/7 for rezoning Amendment Site A, a Judicial Review Application to the Court of First Instance against the TPB's decision on the rezoning application, and a submission to the Planning Department and Transport Department on S12A Application No.Y/H5/8 for rezoning Amendment Site B1.

### **4. The Nature of the Representation**

- 4.1 This Representation objects to Amendment Items A and B1. They will affect the tranquil environment of Sau Wa Fong which is protected in the Explanatory Statement of the OZP for the "Residential (Group C)" ("R(C)") zone, this is especially the case as the protection has been confirmed as recently as 2023. The magnitude of the development intensification is not supported by proportional planning/ public gain. Specifically, the provisions of the facilities for the pedestrians, elderly and disabled persons in the vicinity of St. Francis Street are inadequate to cater for the significantly increased residents and visitors as a result of the future development of the Amendment Sites, resulting in traffic hazards but this has not been properly resolved.

### **5. The Reasons for the Representation**

- 5.1 The reasons for this Representation are summarised below, and each is elaborated for Amendment Items A and B1 respectively in the paragraphs that follow:
- i. Affect the tranquil environment of Sau Wa Fong which is protected in the "R(C)" zoning, this is especially the case as the protection has been confirmed as recently as 2023.
  - ii. Excessive intensification of development density contrary to the Hong Kong Planning Standards and Guidelines ("HKPSG") with respect to building height profile, urban design and heritage preservation.

- iii. The induced traffic to St. Francis Street is underestimated, and will worsen the existing dire transport constraints which is yet to be resolved.
- iv. The 10 metres setback area and the internal transport facilities at Amendment Site A are inadequate and impractical.
- v. No improvement to the barrier-free access leading to St. Francis Street that is disproportionate to the magnitude of the development intensification at Amendment Site B1.
- vi. Contrary to the HKSAR Government's commitment and policy to make the city accessible for all, under the United Nations Convention on the Rights of Persons with Disability, the Disability Discrimination Ordinance and the HKPSG.
- vii. Intrinsic limitations to provide the necessary mitigation measures that would result in cumulative adverse impact on the neighbourhood.

#### ***Amendment Item A***

- 5.2 Affect the tranquil environment of Sau Wa Fong which is protected in the "R(C)" zoning, this is especially the case as the protection has been confirmed as recently as 2023
- 5.2.1 Sau Wa Fong is described in the Explanatory Statement of the OZP as follows, with emphasis bolded:

*"8.4.1 This zone is intended for low to medium-rise residential developments subject to specific plot ratio and building height restrictions to preserve the local character and to avoid adverse visual, air ventilation and traffic impacts from more intensive development. The "R(C)" zone covers sites in the Sau Wa Fong area which is a large and well-preserved terraced area located to the south of Queen's Road East. It is an enclosed and tranquil residential area. The streetscape and low to medium-rise residential developments in the area possess a human scale and create a different urban form in contrast with the high-rise mixed development to the north along Queen's Road East. The generally low-rise character of the area also facilitates southerly downhill wind penetrating into Wan Chai."*

*"8.4.2 The area is inaccessible by vehicular traffic and is connected to Queen's Road East via St. Francis Street and two stepped streets including Sik On Street and Ship Street. The Wan Chai MTR station could be accessed within about 10 minutes' walk. The only vehicular access to the area is via St. Francis Street which is a narrow one-way single lane access road. Cumulative effect of more intensive developments would aggravate the existing traffic problems."*

- 5.2.2 Accordingly, there is reasonable expectation for a preservation of the tranquil environment of Sau Wa Fong. The “R(C)” zoning at sub-area (a) of Amendment Site A has been in place since 1994, and has persisted as recent as the latest amendment of the Wan Chai OZP in May 2023. In the short period of about four months since the last approval of the OZP, the TPB Metro Planning Committee (MPC) has subsequently approved S12A Application No.Y/H5/7 upzoning Amendment Site A in September 2023. This does not give confidence and certainty to the citizens of Hong Kong in the role of strategic and long-term planning.
- 5.2.3 The future 24 hour public passage of not less than 4.5 metres wide with barrier-free facilities through the Site, offering a more direct, convenient and barrier-free route for the public, will promote access from St. Francis Street to Sau Wa Fong. The increased patronage will adversely affect the tranquil environment of Sau Wa Fong.
- 5.2.4 In addition to the Explanatory Statement of the OZP, there are also the similar considerations in “The Study on Redevelopment along Stepped Streets 1991” and “The Review of Stepped Street Site 2012”. These identify the factors for capping the stepped street sites around Sau Wa Fong as “R(C)” to preserve its unique character and terrace ambience, and avoid out-of-scale development. In MPC Paper No.5/25 for the proposed amendments to the OZP, the Planning Department’s assessment was that the increased development intensity is considered not unacceptable by relevant Government departments, provided that there would be a direct vehicular access from St. Francis Street and loading/ unloading facilities within the Site. In MPC Paper No.Y/H5/7, the assessment with reference to two studies of stepped street site had considered vehicular access and fire safety. Therefore, it appears that the amendment is predominantly made on the basis of the traffic access, part of the factors for consideration under the two studies. The considerations on the special local character have not been carefully scrutinised, as supplemented in the discussion on urban design considerations in the following **para 5.3**.
- 5.2.5 While the barrier-free access through the Site is a substantial element, its maintenance and management is uncertain. It is common practice that the developer would close the development company after obtaining an Occupation Permit from the Buildings Authority, such that the onus of the future maintenance and management of the barrier-free access would be dependent on the goodwill of the future owners of the flats. There is no enforcement mechanism, by way of land lease condition given the lease is virtually unrestricted or under the authority of the Planning Department.

5.3 Excessive intensification of development density contrary to the HKPSG with respect to building height profile and urban design

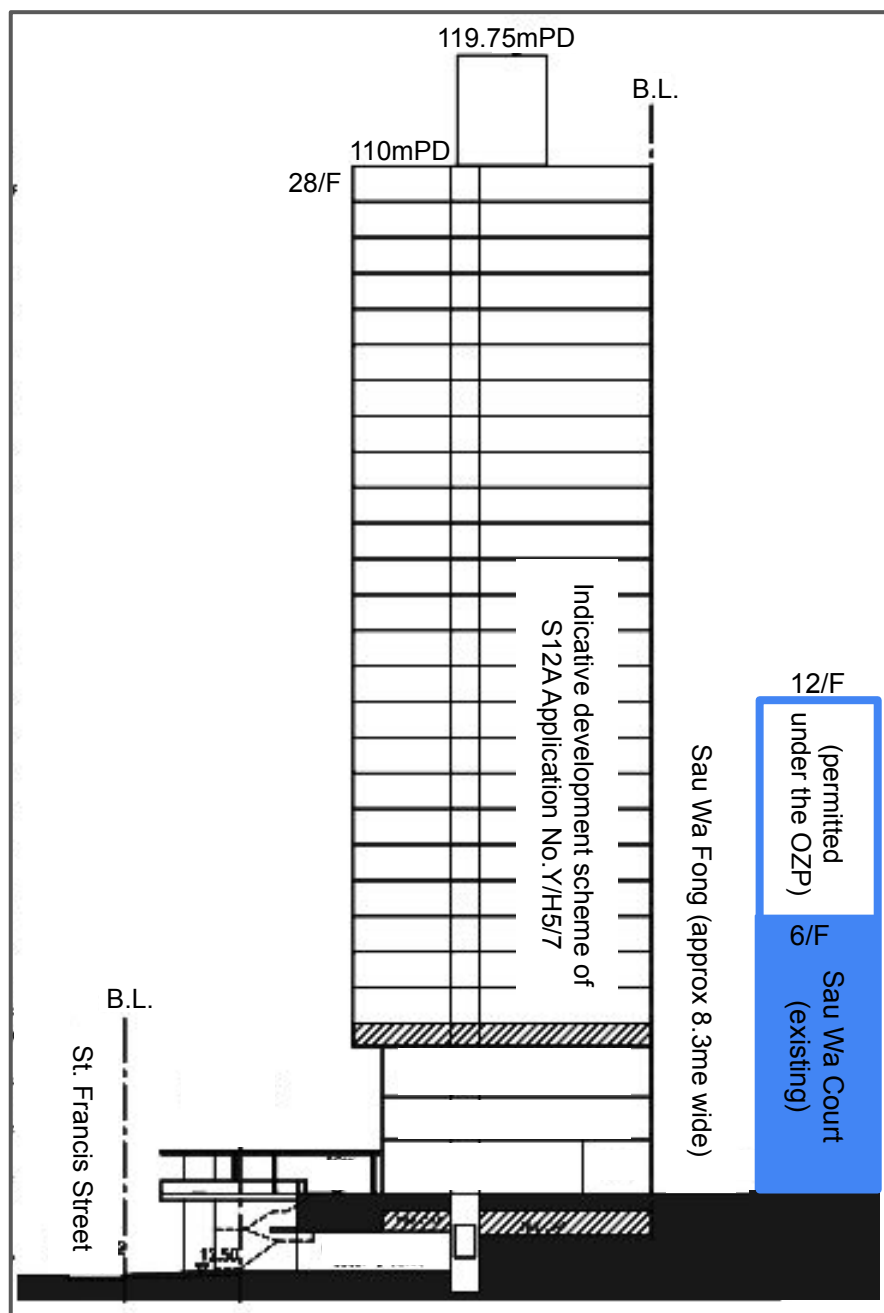
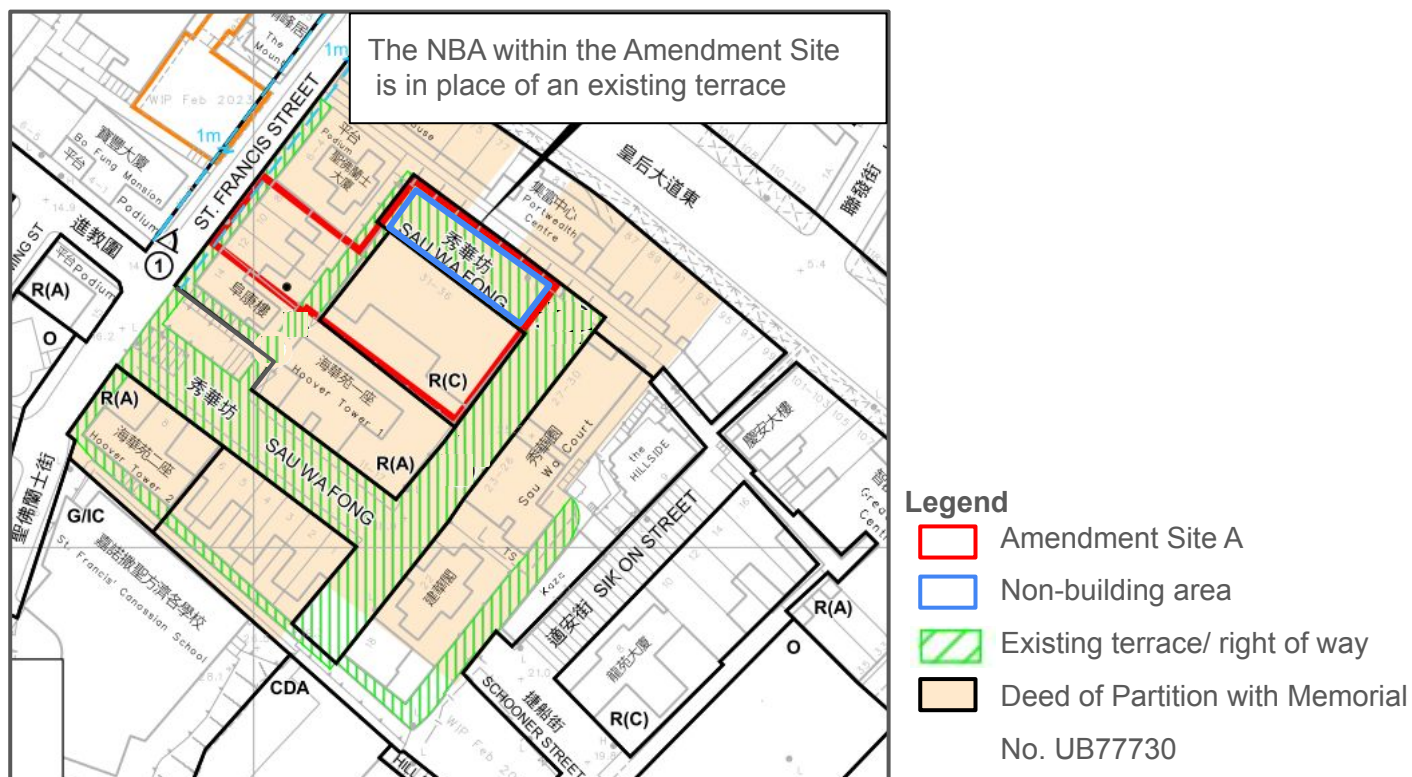
- 5.3.1 The “R(A)9” zone is an up-zoning, if the entire Site was to be developed as a whole. Specifically its sub-area (a), rezoned from “R(C)”, would result in an increase of about 5.18 plot ratio (+103%) and about 16 storeys/ 53 meters building height (+133%) (with reference to the indicative development scheme of the approved S12A Application No.Y/H5/7). This more than doubled plot ratio and building height increase of the amendment is excessive, adversely affecting the characteristics of the neighbourhood. There is a lack of efforts to address the interface between the future 110mPD development at the Site and the existing low-rise low density Sau Wa Fong planned for 12 storeys or about 55mPD, with regard to the urban design provisions in Chapter 11 of the HKPSG in the manner discussed in **Table 1**.

**Table 1.** Urban design considerations for Sau Wa Fong with reference to the HKPSG, with emphasis bolded

Urban design provisions in Chapter 11 of the HKPSG	Considerations for Sau Wa Fong
<p><i>“For other parts of Hong Kong Island, <b>development height should enhance the district character of specific localities</b>, retain characteristic mountain backdrop and <b>respect the character of neighbourhood</b>. The sectional profile should echo the natural topographical profile. Gradation of height profile should be created in relation to topography. Relief and diversity in height and massing of developments should be provided in different localities. <b>Low rise and low density areas should be preserved to enhance diversity in the urban core.</b>”</i> (Para 6.2.8)</p>	<p>The difference in the permitted plot ratio and building height between the new “R(A)9” and the existing “R(C)” is drastic. There is no provision for transition in form of setback or step down at the southeastern part of the Site, to enhance or respect the character of the low-rise low density Sau Wa Fong, which should be preserved to enhance diversity in the urban core. It does not relate to the human scale of the existing residents of the 6 storeys Sau Wa Court and the future visitors to the area. This is especially the case for Sau Wa Fong which is small in area, where the surrounding high-rises already overlook and dominate it, depriving it from a sense of openness.</p>
<p><i>“<b>Building heights and spaces should bear a certain relationship to human proportion and to facilitate easy usage, interaction and perception by the users.</b> Lack of land in Hong Kong makes it difficult to respect human scale but improvements could be made through better transitional space, landscaping and streetscape etc. Better design in public and private residential estates using human dimension as the yardstick will help to ease these tension.”</i> (Para 6.2.21)</p>	

5.3.2 While MPC Paper No.5/25 considers that the non-building area (“NBA”) would preserve the unique character, ambience and environment of Sau Wa Fong, this Representation considers it to be inadequate for the following reasons and as illustrated in **Figure 2**:

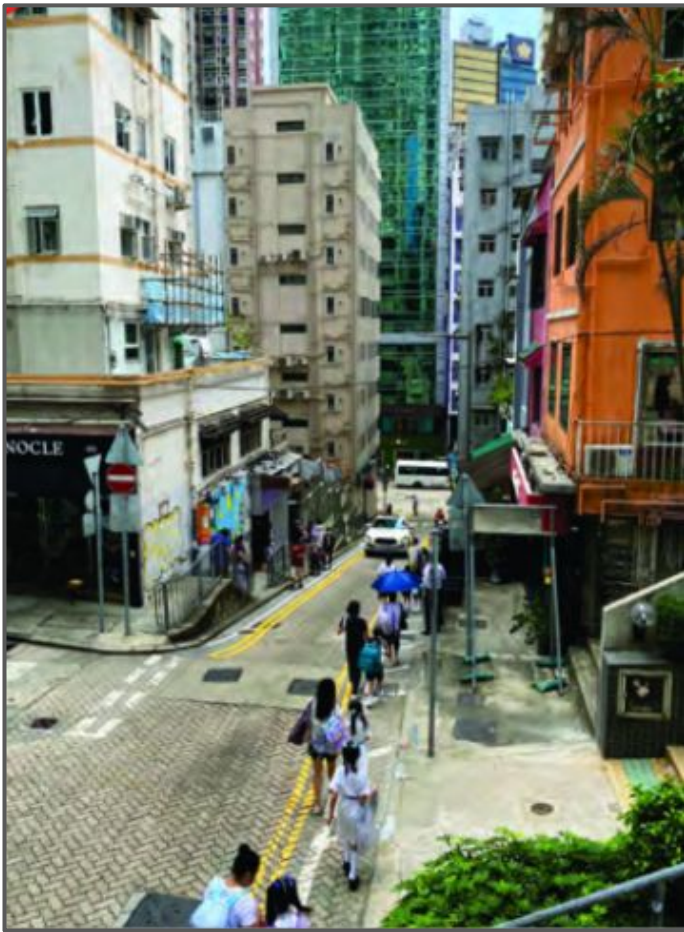
- i. The NBA is in place of an existing terrace, maintaining a status quo of the terrace in the area, at best preserving the existing terrace from being built over.
- ii. The NBA is at the northeastern part of the Site fronting the rear of the buildings along Queen’s Road East and does not serve to alleviate the negative impact of the future development, which is in place of an existing low rise development, on the terrace and Sau Wa Court located to the southeast.
- iii. The future 110mPD development abuts one of the very few remnant terraces in the area, and is only separated from the 6 storeys Sau Wa Court across this about 8.3 metres wide terrace. There is a minimal front setback in the S12A Application, about 1 metre for the entire height of the building with the exception of the refuge floor/ podium garden on the third floor. There will be overlooking and dominating with a detrimental impact on a sense of openness or human scale of the existing residents and future visitors at Sau Wa Fong.



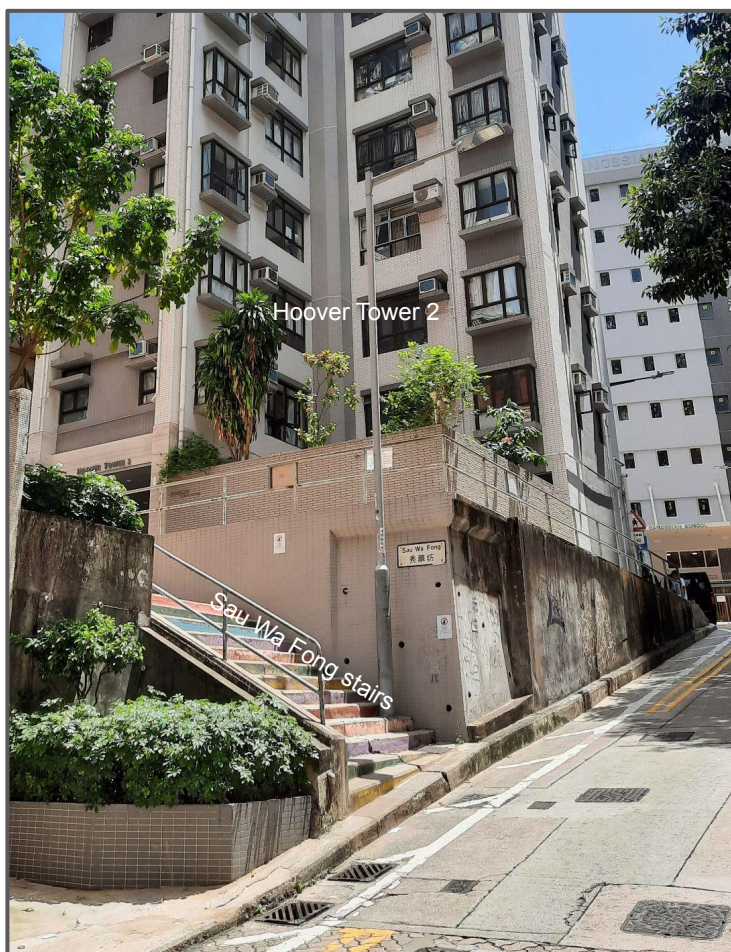
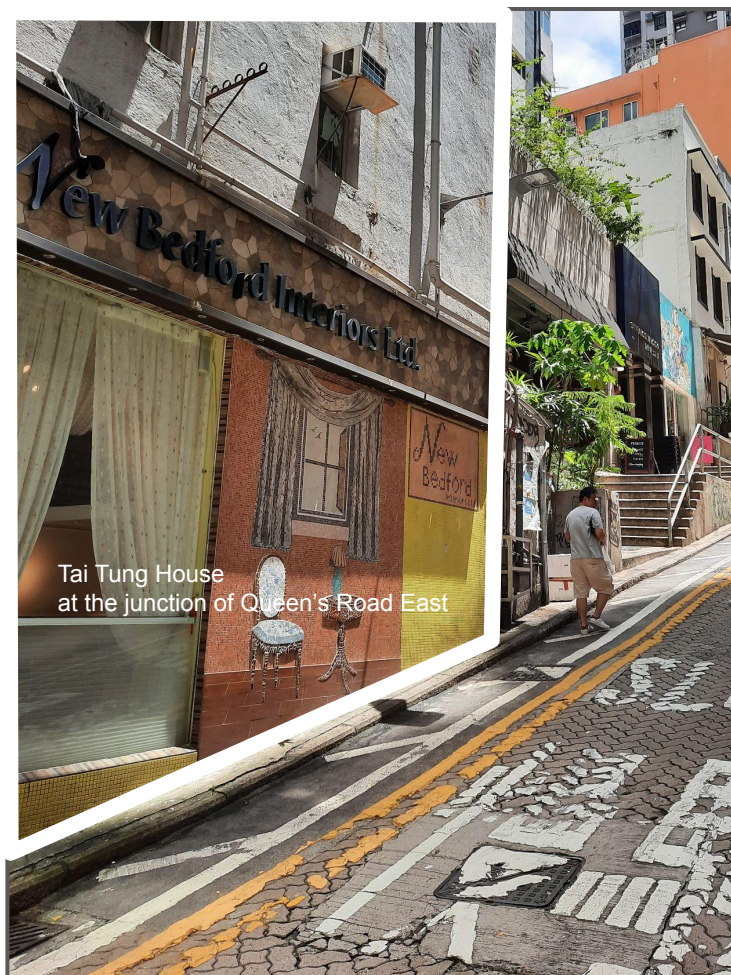
**Figure 2.** Illustrations showing the NBA as inadequate urban design alleviations at Amendment Site A. Top: plan showing the NBA in place of an existing terrace. Bottom: section plan showing the dominating and overlooking effect of the future development on Sau Wa Court across Sau Wa Fong.

- 5.3.3 In the minutes of the MPC meeting for consideration of S12A Application No.Y/H5/7 for the Site, the members appeared to have given more emphasis on sub-area (b) fronting St. Francis Street than sub-area (a) fronting Sau Wa Fong. Members were concerned about the low-rise structure and building setback to improve pedestrian wind environmental and visual permeability, inviting design and open view for the public on St. Francis Street. There were comparably less similar urban design considerations given to the potential impact of the high-rise block disposition and elevation for the public on Sau Wa Fong. Sau Wa Fong is designated as a road on the OZP, even though it is under private ownership and not accessible to vehicles.
- 5.3.4 In the MPC Paper No.Y/H5/7, the Urban Design and Landscape Section of the Planning Department commented that the future development could integrate with the low to medium-rise urban form streetscape and local character of the Sau Wa Fong area; and the multi-level greenery at the lower levels and the rooftop of the proposed block could help enhancing the visual permeability and quality of the proposed development. This is considered to be an inadequate elaboration on the integration with Sau Wa Fong, given the edge planting is shrubs and trailing plants on a balustrade at a small section of the Sau Wa Fong street level frontage, and those on the refuge floor/ podium garden and rooftop are above the Sau Wa Fong street level. Also, there is no requirement or guarantee for the planting shown in the S12A application to actually be implemented in the new development.
- 5.3.5 In the same MPC Paper, the Architectural Services Department commented that the future development is comparable with the surrounding setting and the adjacent "R(A)" area with building height restriction of 110mPD permitted in the OZP. Again, there is no mention of the relationship with the existing low-rise cluster at Sau Wa Fong, which is the special local character to be protected in the OZP.
- 5.3.6 The "R(A)9" zoning with a new delineation of the site boundary with three street frontages will mean that the Site is defined as a "Class C" site under the Building (Planning) Regulations. This will in effect generally gain an additional plot ratio of 2, a plot ratio greater than that of the surrounding properties. Additionally, the stipulated plot ratio and building height restrictions and the NBA restriction and setback requirement benefit from the Notes of the OZP which allow for a possible minor relaxation upon a S16 Application for consideration of the TPB. The permitted development intensity of the Site is already considered to be excessive. The possibility for a further minor relaxation of these controls is not acceptable.

- 5.3.7 The existing interface between “R(A)” and “R(C)” which the new “R(A)9” is in place of is not considered to be a relevant precedent for the amendment. The amendment expands the boundary of the “R(A)” at the expense of “R(C)” should give special treatment to this realigned interface. Sau Wa Fong remains land locked and elevated without vehicular access that is likely to continue its character in the future. It is considered that a gradation in development density and building height is necessary to be provided at the Site. This is considered necessary for maintaining the tranquil environment of Sau Wa Fong, and for the urban design and the amenity of the existing residents and future visitors to the area.
- 5.4 The induced traffic to St. Francis Street has been underestimated, and will worsen the existing dire transport constraints which is yet to be resolved.
- 5.4.1 St. Francis Street is a local distributor road serving one-way vehicular traffic ascending from Queen’s Road East to Star Street, and suffers from the following dire transport constraints:
- i. Substandard width and steepness, not meeting the provisions in Chapter 8 of the HKPSG. The carriageway is 4.5 metres wide or 3.3 meters wide discounting the hatch marking along the southeastern edge and ~16% gradient that is substandard. On the southeastern side, the same side as the Site, the kerbside is not equipped with street furniture, landscaping or weather protection.
  - ii. Saturated pedestrian and vehicular capacity during school peaks of St. Francis’ Canossian School located at the top of the street, as shown in **Figure 3**.
  - iii. The kerbs consist of sections of steps and are incontinuous that are incapable of serving barrier-free access. Pedestrians walk on the narrow strip marked hatch on the carriageway alongside moving vehicles. These are shown in **Figure 4**.



**Figure 3.** Photos showing St. Francis Street during the school peaks of St. Francis Canossian School. Top left and top right: pedestrians walking on the narrow strip marked hatch alongside moving vehicles. Bottom left: school temporary traffic control at the junction with Star Street. Bottom right: illegal on-street parking, waiting, drop-off/pick-up and tailback back that is not uncommon.



**Figure 4.** Photos showing the existing pedestrian facilities on the southeastern side of St. Francis Street. Top left: absence of kerb in front of Tai Tung House. Top right: kerb consist of section of steps and is incontinuous. Bottom left: absence of kerb around the Sau Wa Fong stairs and the retaining wall of an elevated barrier-free access at Hoover Tower 2. Bottom right: the barrier-free access between St. Francis Street and Sau Wa Fong, indicated in green.

- 5.4.2 These dire transport constraints on St. Francis Street have not been given adequate consideration in the supporting Traffic Impact Assessment of S12A Application No.Y/H5/7 for rezoning Amendment Site A, in terms of the following aspects:
- i. No junction operational performance for St. Francis Street/ Star Street. This is notwithstanding the private land ownership status or the “Open Space” and “R(A)” zonings, which are nevertheless designated as road on the OZP and being an existing carriageway for public road users.
  - ii. No pedestrian traffic impact assessment. This is unacceptable for the future development on St. Francis Street which is suffering from dire transport constraints and inadequate pedestrian facilities.
  - iii. The description of the pedestrian facilities in the vicinity of the Site is brief, and does not refer to their shortcomings on St. Francis Street.
  - iv. No construction traffic impact assessment, notwithstanding its requirement at detailed design stage.
- 5.4.3 As such, the increased pedestrian and vehicular traffic as a result of the future development with 216 no. units alongside visitors to the commercial podium with art facilities would aggravate the already dire transport constraints on St. Francis Street, creating additional traffic hazards to the road users. Accordingly, it is considered also necessary to restrict the maximum number of units at the Site, in consideration of the potential traffic impact on St. Francis Street.
- 5.5 The 10 metres setback area is inadequate and is in contrary to the HKSAR Government’s commitment and policy, under the United Nations Convention on the Rights of Persons with Disability, the Disability Discrimination Ordinance and Chapter 8 or the HKPSG
- 5.5.1 The future 10 metres setback area partly accommodating a turntable may contribute to the pedestrian environment at St. Francis Street, but only locally at the frontage of the Site. Tai Tung House downhill on the corner of Queen’s Road East is only subject to 1metre setback upon a redevelopment, and the Sau Wa Fong stairs and the retaining wall of an elevated path at Hoover Tower 2 uphill prevent the provision of a kerb around St. Francis Yard junction. There will be incontinuous kerbs and inconsistent front building setback line across the sites addressing St. Francis Street. While the pedestrian facilities at the Site may serve the future residents and visitors of the development of the Site, there is no levelled walkway to and from Queen’s Road East nor Star Street which connects with an Admiralty MTR Station exit.

5.5.2 By not addressing the need for a comprehensive network of barrier-free pedestrian access and universal access in the locality is disproportional to the future development at the Site with more than doubled the originally permissible development intensity. This is contrary to the HKSAR Government's commitment and policy, under the United Nations Convention on the Rights of Persons with Disability, the Disability Discrimination Ordinance and Chapter 8 or the HKPSG.

5.5.3 The Commissioner for Transport, the Commissioner of Police, the Buildings Department and the Equal Opportunity Commission may not have objection, reservation or adverse comment on the amendment, considering that individual developments would comply with the relevant regulations and requirements. However, this Representation is made in the interest of the public and especially for elderly and disabled persons. In this respect, the TPB must give consideration to the impact of the significantly intensified development density and changing characteristics of the locality. This is an atypical amendment, and represents a quintessential opportunity to provide a focus on improving pedestrian access to the neighbourhood, including barrier-free access arrangement and universal access for the public.

#### 5.6 The internal transport facilities are impractical

5.6.1 The internal transport facilities under the indicative development scheme of S12A Application No.Y/H5/7 is considered to be inadequate and impractical, for the following reasons:

- i. The limited capacity for a private car drop-off/ pick-up or a light goods vehicle loading/ unloading is unlikely to meet the demand of the future development with 216 no. of units and 3 storeys of retail and art facilities, and by the Sau Wa Fong users given the barrier-free access linkage through the Site.
- ii. Absence of waiting space. The subsequent arriving vehicles would queue on St. Francis Street and its kerb, creating traffic delay and blockage for vehicles and traffic hazards for pedestrians on the steep and narrow street.
- iii. The likely increase of its usage and thereby traffic on St. Francis Street, by the vehicles serving passengers to and from the neighbouring buildings on St. Francis Street and St. Francis Yard that currently board/ alight at Queen's Road East. This is an issue subject to enforcement, but these uses should nevertheless be properly accounted and addressed.
- iv. The management of the use of the turntable may not be practical. Vehicles may not drive in and instead illegally drop-off/ pick-up or load/ unload on the street, or may depart without using the turntable and instead reverse onto the street, creating traffic conflict with the road users.

- v. There is a historic water well dated 1950s at the southwestern corner of the site. It is a unique remnant in the urban area and should be preserved. The turntable is in conflict with the water well.
  - vi. The provision and implementation of a turntable at the Site is uncertain. First, its requirement for provision is not stipulated in the Draft OZP. Second, it is common practice that the developer would close the development company after obtaining an Occupation Permit from the Buildings Authority, such that the onus of the future maintenance and management of the turntable would be borne by the future owners and occupants. There is no enforcement mechanism, by way of a land lease condition as the lease is virtually unrestricted or under the authority of the Planning Department.
- 5.6.2 The Representer wishes to highlight that a very cautious approach should be given to the traffic impact of Amendment Item A. This is notwithstanding the Transport Department having approved other developments without on-site transport facilities in the vicinity of the Site. Those developments are not similar to this amendment for significantly increased density. The future developer may not be required to propose and implement traffic management measures, and which the Representer has serious doubts on the adequacy and practicality.
- 5.7 Intrinsic limitations to provide the necessary mitigation measures that would result in cumulative adverse impact on the neighbourhood.
- 5.7.1 The affected “R(C)” site in conjunction with that under Amendment Item B1 represent about a third of the existing “R(C)” low-rise low density development stock in Sau Wa Fong. The amendment with the public passage and barrier-free access leading to Sau Wa Fong through the Site would be detrimental to the tranquil environment of the area. It is more than double the building height and density, and this would inevitably adversely change the urban design characteristics of the area.
- 5.7.2 St. Francis Street is intrinsically restricted in its capacity and potential for improvement to provide suitable pedestrian facilities, vehicular capacity and universal access. This indicates that Amendment Item A is not appropriate.

#### ***Amendment Item B1***

- 5.8 Affect the tranquil environment of Sau Wa Fong which is protected in the “R(C)” zoning, this is especially the case as the protection has been confirmed as recently as 2023
- 5.8.1 According to the Explanatory Statement of the OZP as elaborated in **para 5.2**, Sau Wa Fong has been originally zoned “R(C)” *“to preserve the local character and to avoid adverse visual, air ventilation and traffic impacts from more intensive development ..... It is an enclosed and tranquil residential area. The streetscape and low to medium-rise residential developments in the area possess a human scale and create a*

*different urban form in contrast with the high-rise mixed development to the north along Queen's Road East ..... while cumulative effect of more intensive developments would aggravate the existing traffic problems".* The "R(C)" zoning has been in place since 1994, and has persisted as recent as the latest amendment of the Wan Chai OZP in May 2023. Accordingly, there is reasonable expectation for a preservation of the tranquil environment of Sau Wa Fong.

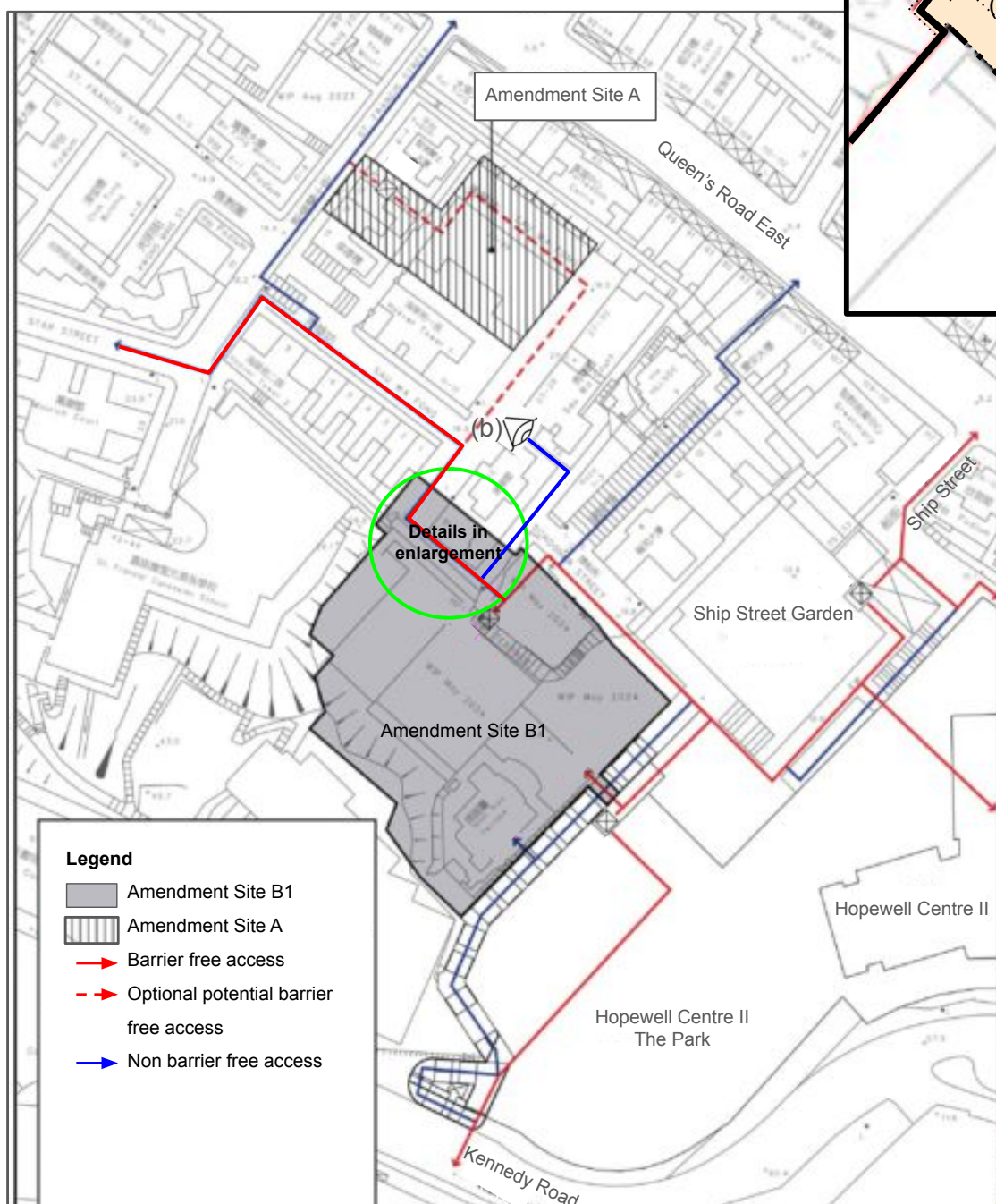
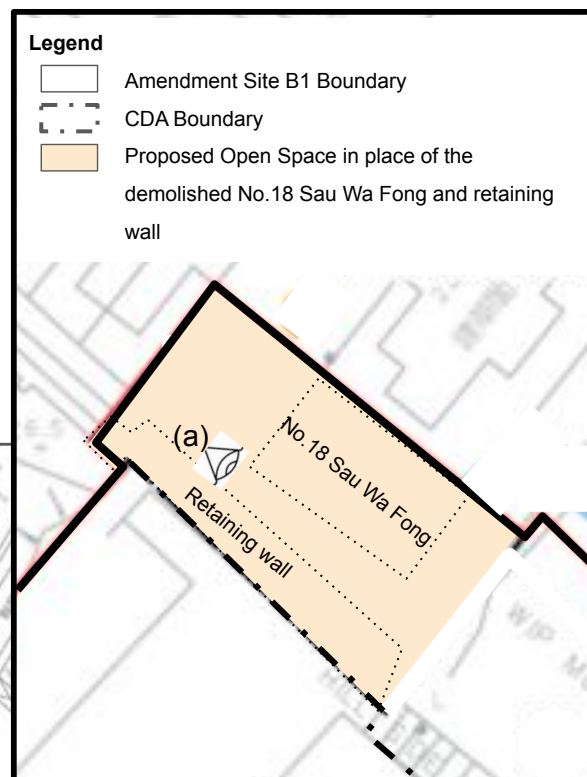
- 5.8.2 The designated NBA for incorporation of an Open Space open to public at the northern corner of the Site in place of No.18 Sau Wa Fong ("Proposed Open Space") will facilitate pedestrian circulation in the east-west direction among Wan Chai MTR station, Hopewell Centre, Hopewell Centre II, Star Street and Kennedy Road, as confirmed in MPC Paper No.Y/H5/8. It will serve as a ~9.3m wide public passageway between Schooner Street and Sau Wa Fong, replacing the existing ~1.4m wide path, and will be an alternative to an existing ~0.9m wide path in parallel, as illustrated in **Figure 5**. The increased pedestrian usage will affect the tranquil environment of Sau Wa Fong.



(a) The ~1.4m wide path between No.18 Sau Wa Fong and a retaining wall to be demolished and replaced by the Proposed Open Space.



(b) The existing ~0.9m wide path in parallel and alternative to the Proposed Open Space.



**Figure 5.** Plan indicating the Proposed Open Space at Amendment Site B1, replacing the narrow paths in Photo (a) and (b), will promote ample and convenient accesses between Hopewell Centre I and II and St. Francis Street.

5.9 Excessive intensification of development density contrary to the HKPSG, with respect to building height profile, urban design and heritage preservation

- 5.9.1 The new “Other Specified Uses” annotated “Residential Development with Historic Building Preserved” (“OU (“Residential Development with Historic Building Preserved)”) zone is an up-zoning, resulting in an increase of about 4.197 plot ratio (+84%) and about 16 storeys (+133%) in relation to “R(C)” or about 29 meters building height (+32%) in relation to the Comprehensive Development Area (“CDA”) (with reference to the indicative development scheme of the approved S12A Application No.Y/H5/8). While alteration to the local character and setting, and massing of the neighbourhood of Sau Wa Fong and Nam Koo Terrace under the approved S16 development scheme for the CDA is appreciated, the about doubled plot ratio and building height increase of the amendment is excessive. There is a lack of consideration given to the interface between the future development at the Site and the Grade 1 historical building at Nam Koo Terrace. Consideration of the heritage constraints for Nam Koo Terrace with reference to Chapter 11 of the HKPSG is discussed in **Table 2.** and illustrated in **Figure 6.**

**Table 2.** Heritage consideration for Nam Koo Terrace with reference to Chapter 11 of the HKPSG

Heritage preservation provisions in the HKPSG	Considerations for Nam Koo Terrace
<p><i>“Effort should be made to create a suitable setting to make a design response to those heritage features.” (Para 6.2.49)</i></p> <p><i>“Context or setting of these heritage features should be responded. Suitable settings for heritage features should be preserved or created. Building heights of new neighbouring developments should generally respect and if necessary be lowered towards the heritage features.” (Para 6.2.51)</i></p> <p><i>“Local districts have their own unique cultural activities, and physical and historical characters. In redevelopment, these activities and characters should be retained and enhanced as much as possible.” (Para 6.2.53)</i></p>	<p>The relationship of the residential tower above shops is of similar arrangement to the approved development scheme for the CDA. There is no demonstrated effort to enhance a suitable setting or stepped building height or measures with respect to the heritage features, as a result of the about doubled development intensity under the amendment. The increased building height and the intensified development density will further predominate and be out of scale with Nam Koo Terrace.</p>



**Figure 6.** Photomontage showing the dominating and overlooking effect of the future residential tower on Nam Koo Terrace. Left: the already large building bulk in the approved S16 application of the CDA. Right: the excessive building bulk in Amendment Item B1.

- 5.9.2 It is considered that the development potential of the Site has already been maximised in the CDA zoning which garners the plot ratio entitlement from the previous low-rise low density Miu Kang Terrace and Hillside Terrace, and the S16 approval, to incentivise the conservation work.
- 5.9.3 In MPC Paper No. No.Y/H5/8, the Urban Design and Landscape Section of the Planning Department acknowledged that the more bulky building mass of the amendment may reduce visual openness when viewed from Sik On Street, Schooner Street and the Ship Street Garden, but does not refer to any mitigation measure. It merely referred to the HKPSG Chapter 11 for measures to reduce the potential impact on Nam Koo Terrace.
- 5.9.4 In the same MPC Paper, the Planning Department's assessment explained that the Site is situated on a higher platform than the "R(A)" sites along Queen's Road East, next to Sau Wa Fong which is a small neighbourhood, in the predominant residential neighbourhood in Wan Chai South that is zoned "R(A)", with the surrounding very tall Hopewell Centre and Hopewell Centre II. The explanation relates to the larger and taller context, but does not discuss with respect to Nam Koo Terrace.
- 5.9.5 The NBA located at the northern corner does not have any frontage to Nam Koo Terrace to the east, and is not an alleviation measure for the significantly increased development density and building height in relation to the historic building. Furthermore, the NBA induces pedestrian increase on Sau Wa Fong that is contrary to the Explanatory Statement as discussed in **para 5.8** above, and St. Francis Street that has not been suitably accounted or addressed as discussed in the following **para 5.10**.
- 5.9.6 Similar to the issue raised in **para 5.3** above the "R(A)" zoning with a new delineation of the site boundary with two street frontages "Class B" site under the Building (Planning) Regulations, will in effect generally gain an additional plot ratio of 1, benefit from a plot ratio greater than that of the surrounding properties. Additionally, the stipulated plot ratio and building height restrictions and the NBA restriction and setback requirement benefit from possible minor relaxation under the Notes of the OZP that would result in an even more substantial development at the site, and is inappropriate.
- 5.10 The Proposed Open Space at the Site will promote the usage of St. Francis Street that is underestimated and would worsen the existing dire transport constraints on St. Francis Street that have not been addressed
- 5.10.1 The dire transport constraints on St. Francis Street as a result of the Proposed Open Space at the Site promoting its usage have not been given due consideration in the supporting Traffic Impact Assessment of S12A Application No.Y/H5/8 for rezoning Amendment Site B1 in terms of the following aspects:

#### Pedestrian traffic

- i. The assessment assumes that there will be no pedestrian increase on St. Francis Street as a result of the future development at the Site, on the basis that *“pedestrian will use alternative routing for access to Queen’s Road East because the walking environment of St. Francis Street is undesirable i.e. steep and substandard footpath”*. The acknowledgment of the problematic pedestrian facilities on St. Francis is not mitigated with any improvement proposal.
- ii. The assumption that 5% of the future pedestrian generation and attraction will be distributed to Star Street is considered to have been underestimated. Star Street connects with an Admiralty MTR Station exit, which is an interchange station to the Tsuen Wan Line, South Island Line and Sha Tin to Central Link; closer than a Wan Chai MTR Station exit. It also offers a different walking experience with weather protection and less hustle bustle. These factors should contribute to a greater choice of the Star Street route.
- iii. The Level of Service for the kerbs in the vicinity of St. Francis Street in 2031 shows no difference under the scenario without the future development at the Site and that also without the planned developments in the vicinity. This cannot be true, given the indicative development scheme of Amendment Site A with a completion year of 2026.
- iv. The flow rate for the southern kerb of Star Street and Sau Wa Fong adjacent to Hoover Tower 2 will increase in 2031. The southern kerb of Star Street is estimated to have a deterioration in its Level of Service from B to C. Increase of pedestrian usage worsening the existing traffic constraints on St. Francis Street is not acceptable.

#### Vehicular traffic

- v. There is no quantitative assessment of the existing or resultant condition of St. Francis Street, or Star Street which is where the two lay-bys supporting the future loading/ unloading activities are located. The observations that the local road network adjoining the Site was not heavily trafficked during AM and PM peak hours are not adequate, especially in support of the significantly increased development intensity of this amendment.
- vi. The assumption that the generated traffic will be travelling in the local road network in the same proportions as the existing traffic demands is inappropriate. There is less level change between the Site and St. Francis Street, in comparison with other carriageways, this is an important factor contributing to a greater choice of St. Francis Street usage. Therefore the forecasted traffic generation on St. Francis is considered to have been underestimated.
- vii. The assessment on the two lay-bys for loading/ unloading facilities on Star Street is based on the current availability that has not taken into account of the future development of Amendment Item A. While there are the supplementary facilities at Hopewell Hotel,

it is considered necessary to also assess their usage as which would have implications on the traffic condition on St. Francis Street.

#### Barrier-free access

- viii. The barrier-free access between Sau Wa Fong and St. Francis Street is around Hoover Tower 2. It is narrow and obscured with a 90 degree turn (as illustrated in the bottom right photo in **Figure 4**). The resultant increased usage of this path is not supported by any improvement to its width, quality or universality. (This barrier-free access is a right of way under the Deed of Partition with Memorial No. UB77730 applicable to the cluster of developments at Sau Wa Fong, including part of the right of ways falling into Amendment Site B1.)
- ix. Regarding the use of the barrier-free access connecting Sau Wa Fong with St. Francis Street through Amendment Site A, first its implementation is subjected to a separate private initiative in the future that is uncertain, second its capacity in serving the pedestrians generated by this amendment in addition to the planned patronage has not been demonstrated. In any case, the problematic provisions for pedestrians, vehicular capacity and universal access on St. Francis Street is yet to be fully addressed,

#### Other issues

- x. The proposed refuse collection for the Site is by way of the management office collecting and transferring to the Star Street Refuse Collection Point by trolley, once per day normally off peak. This will be via the existing barrier-free access around Hoover Tower 2, likely to result in conflict with the pedestrians, and especially elderly and disabled persons in terms of negotiating the use of this narrow and obscured route, with poor hygiene and odour. This is notwithstanding the Food and Environmental Hygiene Department's no comment on the proposed method provided that no environmental nuisance should be generated to the surroundings.
- xi. The assumption of the 68 no. residents additional to the approved development at the Site is on the basis of the significantly increased unit size (from about 54.5m<sup>2</sup> to 89.2m<sup>2</sup>) and decreased average household size (from 2.3 to 2.1), despite of the significantly increased domestic GFA by about 100%. Accordingly, it is considered necessary to restrict the maximum number of units at the Site, in consideration of the potential traffic impact on St. Francis Street.

5.10.2 Therefore Amendment Item B1 has not proactively provided more barrier-free access or enhanced the universal design for the convenience of the public of different age and ability or disability at the western part of Sau Wa Fong. Also it has not included any mitigation measures in response to the existing or future traffic problems on St. Francis Street. This is disproportionate to the about doubled development intensity of the amendment. This is also contrary to the HKSAR Government's commitment and policy to providing access for all, under the United Nations Convention on the Rights of Persons with Disability, Disability Discrimination Ordinance and Chapter 8 of the HKPSG.

5.11 The intrinsic limitations to provide the necessary mitigation measures that would result in cumulative adverse impact on the neighbourhood

5.11.1 The affected "R(C)" site in conjunction with that under Amendment Item A represent about a third of the existing "R(C)" low-rise low density development stock in Sau Wa Fong. The amendment with the Proposed Open Space connecting with Sau Wa Fong to the west would be detrimental to the tranquil environment of the area.

5.11.2 St. Francis Street, which the Proposed Open Space connects with through Sau Wa Fong, is intrinsically restricted in its pedestrian and vehicular facilities and universal access. This amendment about doubled the development intensity at the Site but without improvements to the barrier-free access or enhancement to the universal access at the western part of Sau Wa Fong falls short in its planning /public gain. This is especially the case for the future development of the Site with the vision to become the district node in Wan Chai South, and an exemplar of compact high density sustainable development with improved livability.

## **6. The Amendment Proposed to the Draft Plan**

### **6.1 Outline of the proposed amendments**

6.1.1 The amendments proposed to the Draft Plan include the following, and each is elaborated in the paragraphs that follow:

- i. Reversion to the original respective zonings.
- ii. Reduction of the permitted plot ratio and building height for the respective Amendment Items.
- iii. Deferment of the new zonings taking effect, until the problematic pedestrian and vehicular facilities and the universal access on St. Francis Street are resolved given that improvement works is considered to be feasible.

## 6.2 Reversion to the original respective zonings

6.2.1 The zonings at the respective Amendment Sites A and B1 and their pertinent Notes and Explanatory Statement are proposed to be reverted to that included in the original OZP No.S/H5/31, to protect the tranquil environment of Sau Wa Fong in accordance with the Explanatory Statement of the OZP.

## 6.3 Reduction of the permitted plot ratio and building height for the respective Amendment Items

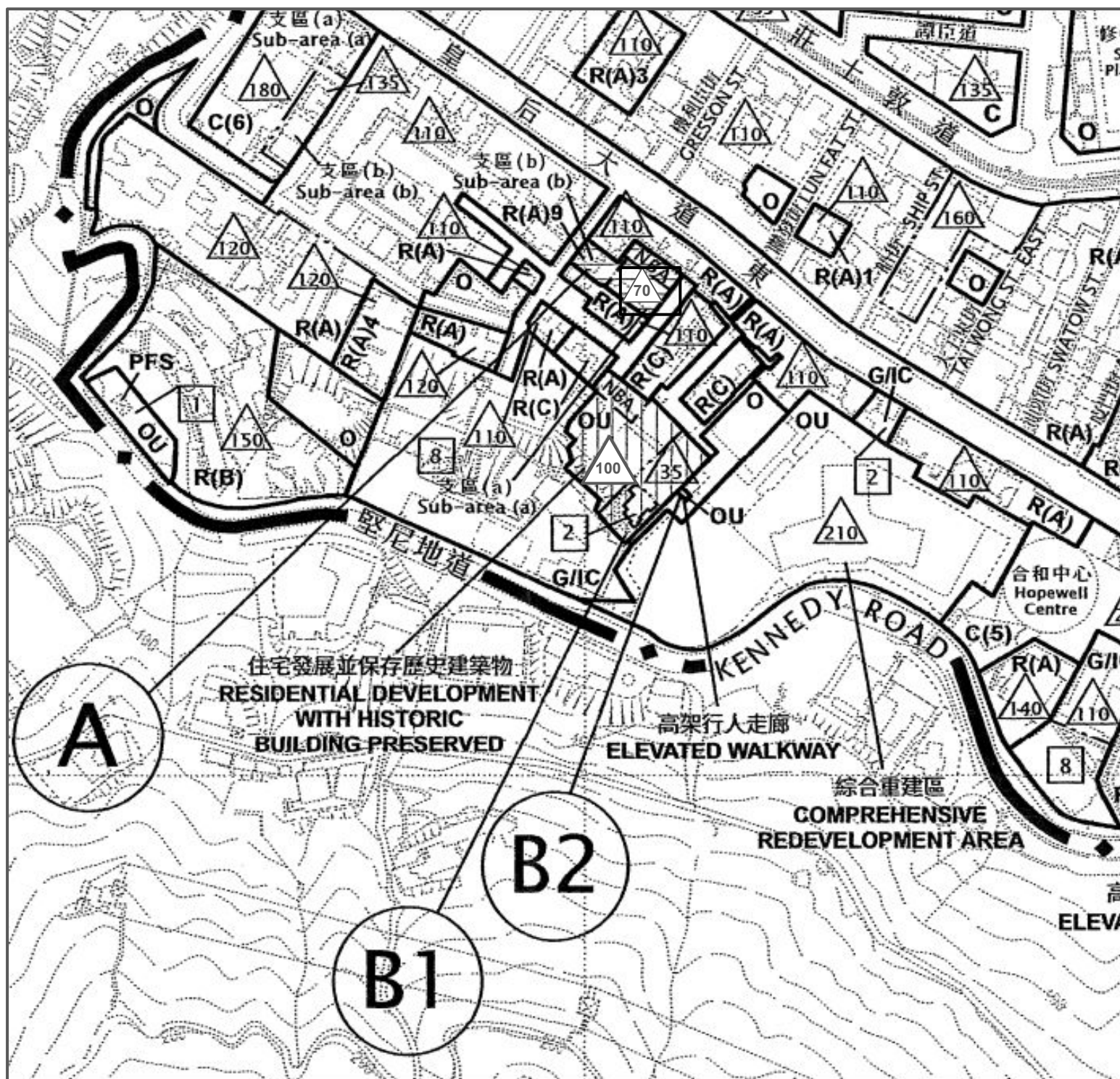
6.3.1 Should the proposed amendment to revert to the original zoning discussed in **para 6.2** not be supported by the TPB, the permitted plot ratio and building height of the respective Amendment Items are proposed to be reduced. The objective is to protect the tranquil environment of Sau Wa Fong and form a gradation with Nam Koo Terrace. The proposed amendments facilitating a notional increase generally pro rata to the plot ratio change, are summarised in **Table 3**, and shown on an extract of the Draft OZP and the relevant clauses in the Notes in **Figure 7**. (The Explanatory Statement of the Draft OZP is also to be amended as appropriate.)

**Table 3** The proposed amendments to the development parameters for the respective Amendment Items

	<b>Amendment Item A</b>	<b>Amendment Item B1</b>
<b>Plot ratio restriction</b>	Sub-area (a): from B(P)R to 6  Sub-area (b): no change	From B(P)R to 6
<b>Building height restriction</b>	Sub-area (a): from 110mPD to 70mPD  Sub-area (b): no change	Residential tower: from 120mPD to 100mPD  Nam Koo Terrace: no change
<b>Unit number restriction</b>	130	205

6.3.2 The clauses for possible minor relaxation of the plot ratio, building height restriction, NBA and setback are proposed to exclude their applications on both the “R(A)9” and “OU (Residential Development with Historic Building Preserved)” zonings.

6.3.3 A new clause to restrict the maximum number of units is proposed to be included for the respective “R(A)9” and “OU (Residential Development with Historic Building Preserved)” zonings.



**Figure 7a.** Proposed amendments of the Representation, shown on an extract of the Draft Wan Chai OZP No.S/H5/32

#### Legend

- C Commercial
- G/IC Government, Institution or Community
- O Open Space
- OU Other Specified Uses
- R(A) Residential (Group A)
- R(B) Residential (Group B)
- R(C) Residential (Group C)
- 5 Building Height Restriction (In Number of Storeys)
- 120 Building Height Restriction (In mPD)

## **RESIDENTIAL (GROUP A)**

### **Remarks**

- (9) On land designated “Residential (Group A)9”, no new development, or addition, alteration and/or modification to or redevelopment of an existing building shall result in a total development and/or redevelopment in excess of the maximum plot ratio and/or building heights specified below, or the plot ratio and height of the existing building, whichever is the greater:

<b><u>Sub-area</u></b>	<b><u>Development Restriction(s)</u></b>
Sub-area (a)	a maximum plot ratio of 5.0 and a maximum building height of 12 storeys
Sub-area (b)	a maximum building height of 110 metres above Principal Datum
Single development or redevelopment covering both sub-areas (a) and (b)	<b><i>a maximum plot ratio of 6.0 and</i></b> a maximum building height of <del>110-70</del> metres above Principal Datum

- (13) Based on the individual merits of a development or redevelopment proposal, minor relaxation of the building height restrictions stated in paragraphs (1) and ~~(9)~~ (8) above, ~~plot ratio restriction stated in paragraph (9) above~~, and any reduction in the gross floor area provided for Government, institution or community facilities stated in paragraphs (4) to (7) above, may be considered by the Town Planning Board on application under section 16 of the Town Planning Ordinance.
- (14) Under exceptional circumstances, for a development or redevelopment proposal, minor relaxation of the non-building area restriction as stipulated on the Plan and the setback requirements stated in paragraphs (11) and (12) above may be considered by the Town Planning Board on application under section 16 of the Town Planning Ordinance. ***This is with the exception of and does not apply to “Residential (Group A)9”***
- (15) ***On land designated “Residential (Group A)9”, no new development, or addition, alteration and/or modification to or redevelopment of an existing building shall result in a total development and/or redevelopment in excess of 130 number of units.***

## **OTHER SPECIFIED USES**

### **For “Residential Development with Historic Building Preserved” Only**

- (7) ***No new development, or addition, alteration and/or modification to or redevelopment of an existing building shall result in a total development and/or redevelopment in excess of a maximum pot ratio of 6 or the plot ratio of the existing building, whichever is greater.***
- (8) ***No new development, or addition, alteration and/or modification to or redevelopment of an existing building shall result in a total development and/or redevelopment in excess of 205 number of units.***
- ~~(7) Based on the individual merits of a development or redevelopment proposal, minor relaxation of the building height restrictions stated in paragraph (2) above may be considered by the Town Planning Board on application under section 16 of the Town Planning Ordinance.~~
- ~~(8) Under exceptional circumstances, for a development or redevelopment proposal, minor relaxation of the non-building area restriction as stipulated on the Plan and the setback requirement stated in paragraph (5) above may be considered by the Town Planning Board on application under section 16 of the Town Planning Ordinance.~~

#### 6.4 Deferment of the new zonings taking effect

- 6.4.1 Upon the TPB agreement to the abovementioned reduced plot ratio and building height for the respective Amendment Items in **para 6.3**, the new zonings will only take effect when the existing inadequate pedestrian and vehicular facilities and the universal access at St. Francis Street are improved. The proposed pre-conditions for the respective developers are outlined in **Table 4**. This is given improvement works are considered to be feasible.

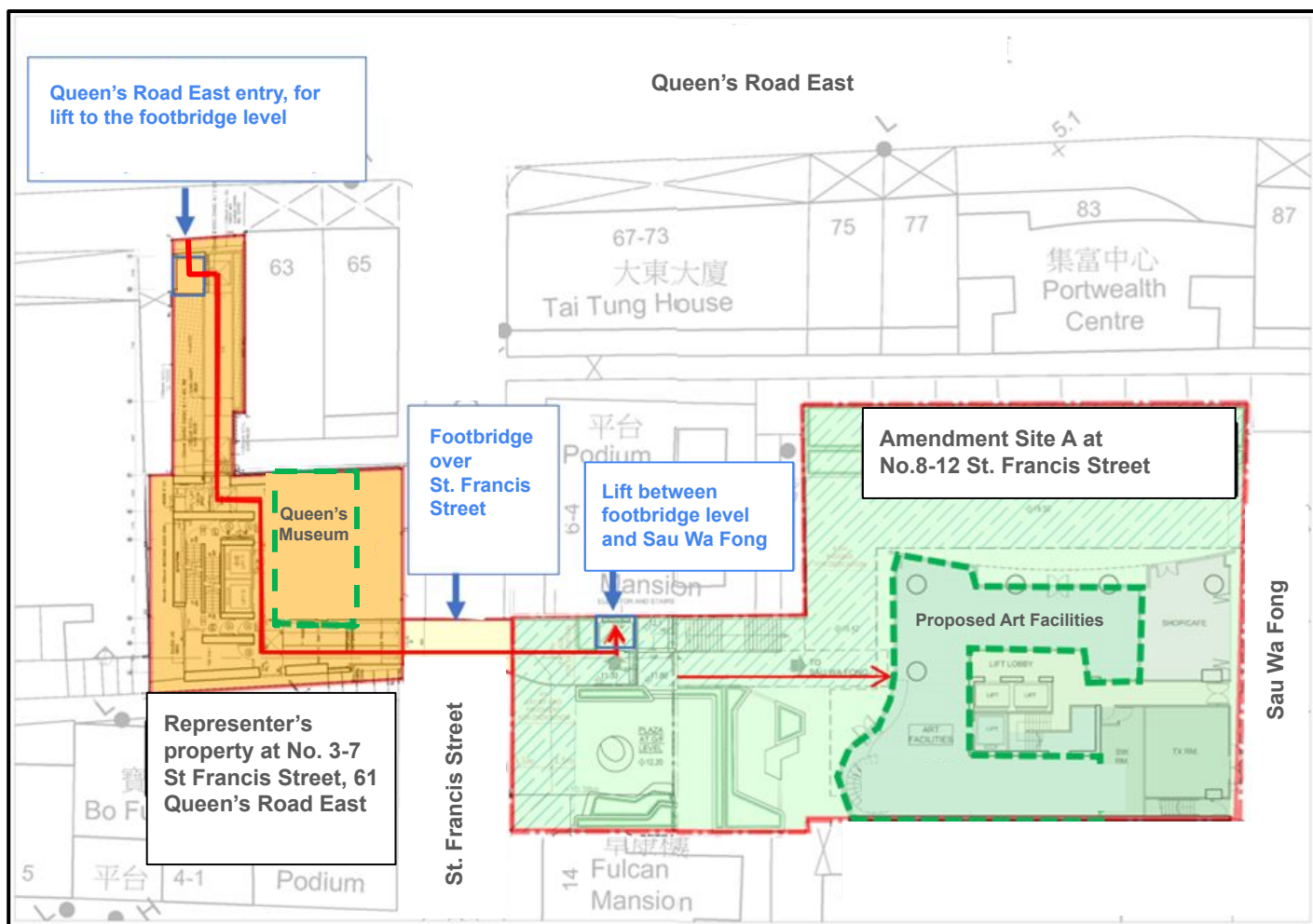
**Table 4** The proposed pre-conditions for the respective developers prior to the new zonings taking effect, and their considerations

	<b>Amendment Item A</b>	<b>Amendment Item B1</b>
<b>Pre-conditions for developers</b>	<ul style="list-style-type: none"> <li>i. Proposal to resolve the pedestrian and vehicular facilities and the universal access at St. Francis Street between Amendment Site A and Queens Road East, to the satisfaction of relevant Government departments.</li> <li>ii. The proposal is to be accompanied by an undertaking to construct, and complete the construction works to the satisfaction of relevant Government departments no later than the occupation of the future development at Amendment Site A.</li> <li>iii. Undertaking to construct the turntable at the front setback area.</li> <li>iv. Undertaking to include suitable clauses in the future Deeds of Mutual Covenant, to provide for ongoing maintenance and management of the barrier-free access and turntable.</li> </ul>	<ul style="list-style-type: none"> <li>i. Proposal to enhance the barrier-free access for universal access between Sau Wa Fong and St. Francis Street around Hoover Tower 2 and the Sau Wa Fong stairs.</li> <li>ii. Proposal to resolve the pedestrian and vehicular facilities and the universal access at St. Francis Street between the Sau Wa Fong stairs and Star Street, to the satisfaction of relevant Government departments.</li> <li>iii. The proposals are to be accompanied by an undertaking to construct, and complete the construction works no later than the occupation of the future development at Amendment Site B1.</li> </ul>

<b>Consideration</b>	Improvement works in form of a footbridge over St. Francis Street is considered to be feasible as discussed in <b>para 6.4.2</b> and <b>6.4.3</b> .	Improvement works is considered to be feasible. There is ample space available, and the entitlement to the right of way under the Deed of Partition with Memorial No. UB77730 shared with the right of way falling into Amendment Site B1.
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***Footbridge over St. Francis Street at Amendment Site A***

- 6.4.2 At the Representer's property at No. 3, 5, 7 St. Francis Street and 61 Queen's Road East, the construction works are at the final stages for completion. At the non-domestic podium, the lower two floors will be dedicated to the establishment of a digital art museum, the "Queen's Museum", for the public on free admission, to promote arts and culture in Hong Kong.
- 6.4.3 The Representer has a genuine good faith intention of linking the development projects in the vicinity for wider public benefit, including through promotion of cultural heritage and arts, as well as barrier-free access to a greater extent. This is by way of a footbridge over St Francis Street, connecting the Queen's Museum at the Representer's property with the art facilities in the indicative development scheme at Amendment Site A. This will complete the currently incontinuous pedestrian linkage on St. Francis Street, and provide a universal access between Queen's Road East and Sau Wa Fong. This footbridge solution is illustrated in a diagrammatic plan in **Figure 8**, and a walkthrough video available by scanning the QR code below. (The applicants of S12A Application No.Y/H5/7 have not engaged in discussions relating to the footbridge solution previously proposed in the public comment to the S12A Application.)



**Figure 8.** Diagrammatic plan indicating the envisaged footbridge over St. Francis Street, completing a comprehensive barrier-free and extensive pedestrian network between Queen's Road East and Sau Wa Fong.



**QR Code for scanning :** A walkthrough video of the footbridge, from the Queen's Road East entry of the Representer's property to the envisaged footbridge over St. Francis Street for connection to Amendment Site A.

## **7. Conclusion**

- 7.1 The Amendment Items, specifically their respective barrier-free access and Proposed Open Space, will change the tranquil environment of Sau Wa Fong that is considered important for preservation under the Explanatory Statement for the “R(C)” zoning of the OZP. The intensified development density is considered excessive, also in terms of urban design considerations in the relationship with the low-rise low density “R(C)” cluster and Nam Koo Terrace.
- 7.2 At the same time, the barrier-free access and Proposed Open Space will induce additional traffic on St. Francis Street. The existing street facilities for the pedestrians, elderly and disabled persons are inadequate to cater for the significant increase in residents and visitors.
- 7.3 The magnitude of the development intensification is not supported by proportional planning/ public gain in form of transport mitigation and/ or improvement measures, resulting in traffic hazards that have not been properly resolved, especially for persons with disability. The MPC did not address any of the pedestrian safety issues which were not thought to be of any prime importance and were given little weight. It is irresponsible for the TPB in carrying out its functions in accordance with S3 of the Town Planning Ordinance, to promote an increase in development density while the potential traffic impact, public safety issues and general public amenity on the surrounding road networks will all be adversely affected as a result of the future development at the Amendment Sites.
- 7.4 The TPB’s favourable consideration of this Representation is sought, in accepting the reasons for the concern on Amendment Items A and B1 of the Draft OZP and the proposed amendments.