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**From:** [REDACTED]  
**Sent:** 2025-08-27 星期三 23:18:20  
**To:** tpbpd/PLAND <tpbpd@pland.gov.hk>  
**Subject:** Wan Chai Outline Zoning Plan S/H5/32  
**Attachment:** DSC08447.JPG

**Submission Number:**  
TPB/R/S/H5/32 -S034

**To:**  
The Chairperson and Members of the Town Planning Board

**From:**  
John Batten [REDACTED]

[REDACTED] (please contact using email, thank you)

**Re: Representation to the Wan Chai Outline Zoning Plan S/H5/32**

Dear Members

Twenty years ago in 2005, the Central & Western Concern Group was formed by myself and Katty Law. With the assistance of town planner, Ian Brownlee of Masterplan Limited, we initiated many town planning applications. We argued using rational planning and heritage principles and addressed our concerns to the Members of the Town Planning Board - many Members had similar concerns as us. In conjunction with these planning applications, our group had many discussions with the Central & Western District Council and its members and made representations to LegCo, the Antiquities Advisory Board, the Planning Department and Development Bureau officials. The government then developed its 'Preserving Central' initiative and heritage landmarks which we battled to preserve, including PMQ, Tai Kwun, Bishop's Hill, Central Market, the West Wing of the former Central Government Offices were fully preserved. In addition, many URA projects were curtailed and/or improved through using the town planning processes.

The public has come on board and all these heritage sites are now much loved and visited, if open to the public.

During COVID, the Central & Western Concern Group was much quieter due to the many restrictions placed on gatherings etc. However, reading the proposals for this Wan Chai OZP makes me STRONGLY OBJECT!

The Star Street area of Wan Chai is a much loved part of Hong Kong and is similar to the historic Central and SOHO areas of Hong Kong island. It is frequented by local Hong Kong people and tourists.

Visitors from the mainland love the ambience of this part of Wan Chai, as it is so different from most mainland tourist areas: it is a genuine area of low-rise buildings with an excellent mixture of ground-floor design-related businesses and upper-floor residences. It is a historic low-rise area with many 'ladder-type streets' with staircases running up to Kennedy Road from Queen's Road East: the urban fabric of alleys is similar to Central's historic alleys and streetscape.

The notes to the Wan Chai OZP categorically acknowledge these special characteristics of Wan Chai. They include:

- a) This zone is intended for low to medium-rise residential development 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. (8.4.1.)
- b) Given the special local character of the area, development intensity is restricted to a maximum building height of 12 storeys. (8.4.3.)
- c) Subject to specific building height restrictions (12 storeys) to address problems of loading /unloading, limited emergency access and fire safety concerns.  
More intensive development in the area is not recommended because of safety concerns particularly for the disabled and elderly (7.5.1.)
- d) The area is inaccessible by vehicular traffic (8.4.2.)
- e) Loading/unloading facilities have to be carried out manually at a distance, posing inconvenience to residents. (7.5.1)
- f) In case of emergency, safety might be at stake because of access problems for ambulance services and fire-fighting. (7.5.1)
- g) The inaccessibility of fire engines to the site would pose a safety risk and inconvenience to residents (8.4.4)
- h) The cumulative effect of more intensive developments would aggravate the existing traffic conditions" (8.4.2).
- i) The generally low-rise character of the area facilitates southerly downhill wind penetrating into Wan Chai". (8.4.1)
- j) A well preserved, enclosed and tranquil residential area and that 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 building height restrictions are to preserve the local character and to avoid adverse visual impact (8.4.1.)



These planning guidelines are very clear and sensible. These are the very guidelines and factors that Town Planning Board Members consider when looking at planning applications. Likewise, these broad-brush planning parameters also give developers and planning applicants guidelines to what is and isn't appropriate development under the Wan Chai OZP.

The developer, Hopewell Holdings, in its planning applications, Y/H5/5 and Y/H5/7, outlined its development intentions. These intentions are DESPITE the clear guidelines offered in the Wan Chai OZP! The developer has long ignored the OZP guidelines, accumulating properties and now wishes to impose its intense-development vision on this historic, steep-hilled site, contrary to the OZP's broad-brush planning guidelines.

The Town Planning Board must reject the intensive development proposed in Site A and Site B1 in this OZP and stay within the guidelines of the OZP: no intense development permitted, to preserve the local character and restrict traffic congestion on the narrow and steep St Francis Street and other roads. Because there is no direct vehicle access to these sites and no EVA, a height restriction of 12 storeys must be imposed. Making a precedent could have serious future planning consequences and risk the lives of residents - formulating "fire engineering" alternatives is not good enough.

In my capacity as a former gallery owner, art critic and curator, I know the Asia Art Archive well. I am very aware of the physical and office needs of the Archive. In application Y/H5/5, Hopewell Holdings advised the Town Planning Board that two levels of the building to be built on Site A would be devoted to accommodating the Asia Art Archive. Two Asia Art Archive staff addressed the Board and answered Members' questions.

The Asia Art Archive is currently located in commercial premises on Hollywood Road, Sheung Wan. Its current library is 3,000 square feet, with additional office space (approximately 1000 sq feet) on another floor of the same building. When I studied the documentation about the the Hopewell building on Site A it states that the two floors for Asia Art Archive will total 458.65 square metres, which is about 1,500 sq feet (see: M/H5/25/4 Drawing 7 - attached. Presented to the TPB for application Y/H5/7). The space allocated to the Asia Art Archive in Site A is grossly inadequate for their needs and cannot be considered a 'planning benefit', as characterised by the developer. In this case, has some misrepresentation been given to the Town Planning Board?

The high-rise development on Site B1 is grossly intense and inappropriate and will overwhelm the historic Nam Koo Terrace, the mansion and its other important architectural features including the fountain and pavilion. The maximum height allowed should be, as the

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'stepped street' guidelines state and as outlined in the current Wan Chai OZP: 12 storeys.

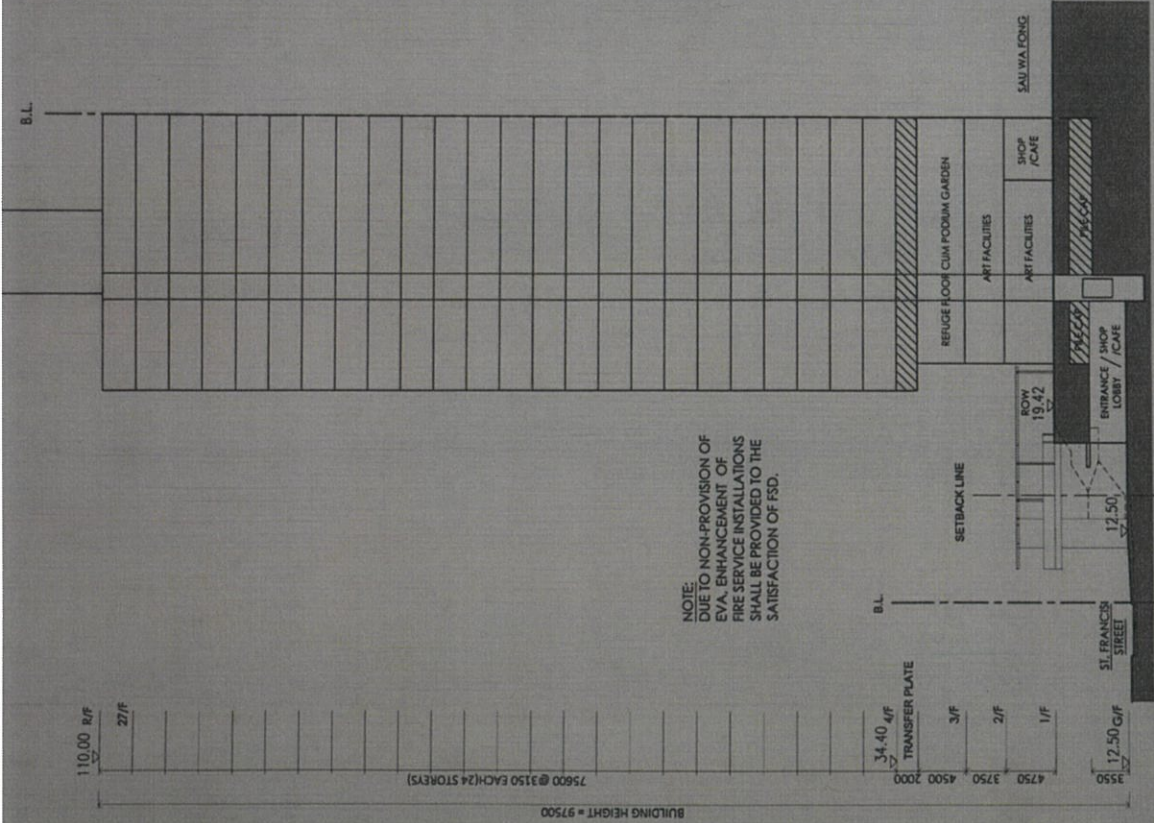
In conclusion, please reject the proposals in this OZP and revert to the height, heritage, special characteristics and planning guidelines as stated in the OZP.

Many thanks and kind regards

John Batten.



APPLICATION SITE AREA		ABOUT 107,127 m <sup>2</sup> (BASED ON SURVEYED AREA)
NET SITE AREA		ABOUT 953,028 m <sup>2</sup> (BASED ON SURVEYED AREA)
NUMBER OF TYPICAL STOREY		24
G/F ENTRANCE LOBBY		247.31 m <sup>2</sup>
3/F		44.46 m <sup>2</sup> (LIFT CORE AREA)
TYPICAL (4/F - 27/F)		370.43 m <sup>2</sup> X 24 = 8890.32 m <sup>2</sup>
TOTAL PROPOSED GFA		9182.09 m <sup>2</sup> [98,835.112] [P.R. 9.635]
REMAINING NON-DOMESTIC PLOT RATIO		$\frac{[10 - 9.635]}{10} \times 1.5 = 0.548$
TOTAL NUMBER OF UNITS		216 NOS.
NON - DOMESTIC:		
ART FACILITIES + G/F & 1/F SHOP/CAFE		458.65 m <sup>2</sup> + 20.00 m <sup>2</sup> + 43.62 m <sup>2</sup>
TOTAL PROPOSED NON-DOMESTIC GFA		522.27 m <sup>2</sup>
TOTAL PLOT RATIO		0.548



## SCHEMATIC SECTION