

Urgent Return receipt Expand Group Restricted Prevent Copy

tpbpd/PLAND

寄件者: [REDACTED]
寄件日期: 2026年02月24日星期二 21:36
收件者: tpbpd/PLAND
主旨: PROPOSED AMENDMENTS TO THE MA TAU KOK OZP NO. S/K10/30
類別: Internet Email

Submission Number: TPB/R/S/K10/31-S5

PROPOSED AMENDMENTS TO THE MA TAU KOK OZP NO. S/K10/30

Item A – about 1,463m². Amending the BHR of the “G/IC” site occupied by Evangel Hospital at 222 Argyle Street from 5 storeys to 114mPD

Y/K10/6 Approved 4 July 2025 (Y/K10/5 approved 2023)

Evangel Hospital, 222 Argyle Street, Kowloon City

Site area: About 1,463sq.m

Zoning: "GIC"

Proposed Amendment: Increase BH from 5 storeys to 114mPD -22 storeys (80mPD -16 storeys) / PR 12.53 (8:9) (2.68) / 104 Bed Spaces (60) / 43 Vehicle Parking

Strong objections. The approved application was not just to increase BH, it did not mention that the PR was also to be increased. Both at over 4 times the original.

Under the Lease, the parcel of ground or any building or part of any building shall only be used for a non-profit-making hospital and clinic purposes or both and is restricted to a building height of 45.72mPD or not exceeding 12 storeys. The site coverage is constrained to a maximum of 65%.

The site coverage greatly exceeds that allowed in the lease at 83%

The site is on a junction. Some GIC developments, especially the low-rise and low-density ones, serve as “breathing space” within a high-rise and high-density environment. That a 120 page Ventilation Impact Assessment was provided indicates that there are issues. The district has a number of development projects in progress or planned that indicate the need for some relief from the wall effect.

*“Setback of the hospital tower **above the 9-storey podium** at Fu Ning Street can break down the visual mass, maintain a wider view corridor along Forfar Road, facilitate air ventilation and visual permeability”*

Urgent Return receipt Expand Group Restricted Prevent Copy

THIS STATEMENT IS AN INSULT TO INTELLIGENCE. THE SET BACK PROVIDES ZERO RELIEF AT STREET LEVEL

According to the developer the overall visual impact caused by the Proposed Redevelopment is slightly adverse but the images indicate otherwise.

Comments of Urban Design Unit, Planning Department re the 2023 approved plan:

“and sensitive building facade treatment with contrasting wall tones are also incorporated into the proposed development. These measures may promote visual interest and pedestrian comfort

The Applicant will consider applying vertical articulation to the building façade of both podium and tower by using stone or ceramic verticals arrayed around all sides of the building with angled panels between stone or ceramic. This creates a subtle and interesting gradation of density, rhythm and articulation that gradually lightens its architecture from top to bottom.”

BH of 80mPD will allow for a continuous height band along Argyle Street.

The proposed building height is the same as the allowed building height of adjacent residential zones along Argyle Street, and lower than the maximum building height of other residential zones in the vicinity.

BUT THIS IS GIC ZONING AND WITH THE CONTINUAL REDEVELOPMENT OF RESIDENTIAL SITES IN THE DISTRICT THE RELIEF BROUGHT BY THE OCCASIONAL LOW-RISE GIC FACILITY IS EVER MORE ESSENTIAL. THE STEP - DOWN EFFECT IS ALSO APPLICABLE TO MAIN THROUGHFARES TO FACILITATE PENETRATION OF LIGHT AND VENTILATION TO THE BUILDINGS TO THEIR REAR. DEVELOPMENTS ON JUNCTIONS SHOULD BE LOWER IN ORDER TO ENHANCE VISIBILITY AND SAFETY, REDUCE CANYON EFFECT AND INCREASE VENTILATION.

THIS WILL BE ANOTHER CONCRETE BLOCK, NO AMOUNT OF GREEN-WASH OR DICKERING WITH THE FACADE CAN MITIGATE THE IMPACT ON THE PEDESTRIAN WHEN IT COMES TO FURTHER ELIMINATION OF PENETRATION OF SUNLIGHT AND RELIEF FROM WALL EFFECT.

NO EXPLANATION FOR THE ABOUT TURN ON THE PART OF PLANNING DEPT RE THE ALMOST 50% INCREASE IN HEIGHT.

“including podium garden at 3/F”.

THIS WAS SUBSEQUENTLY REPLACED WITH A ‘COMMUNAL GARDEN’ ON TOP OF PODIUM, PROVIDING NO BENEFIT TO PEDESTRIANS AND CERTAINLY OF ZERO COMMUNITY BENEFIT

There is also the issue of the impact the increase in vehicular movement over the public pavement would have on road leading to not one but three schools. While the number of parking has not increased from the 5 application, the additional facilities will attract a significant increase in drop off and pick up, this on a busy junction.

THE NUMBER OF BEDS PROVIDED IS CERTAINLY NOT COMPATIBLE WITH THE MASSIVE INCREASES IN BH AND PR. DAY BED SPACES CANNOT BE COUNTED AS THESE ARE

Urgent Return receipt Expand Group Restricted Prevent Copy

NOTHING MORE THAN SPACES WHERE PATIENTS ARE WHEELED ON NARROW GURNEYS AFTER MINOR PROCEDURES LIKE COLONOSCOPY.

Insufficient set back from Hoover Court, no mention of any impact should there be a fire at this residential block. Is there enough space for fire engines to operate effectively? This is an issue that should be clarified in view of recent disasters.

IN ADDITION, THE MANAGEMENT HAS BEEN BREACHING THE LEASE CONDITIONS FOR MANY YEARS. WILL ANY ACTION BE TAKEN ON THE LINES OF THE CHARGES BROUGHT AGAINST JIMMY LAI FOR BREACH OF LEASE?

In accordance with the condition stipulated in the land lease document of K.I.L. 8813, the Association of Evangelical Free Churches of Hong Kong ("the lessee") will not erect or maintain or allow to be erected or maintained on the said piece or parcel of ground any building or buildings other than a forty to forty-five bed non-profit making hospital and clinic

Now it is clear that the intention is not to operate a hospital, the number of beds would only double from the existing 60, but to operate a commercial healthcare centre on the lines of 28 Hankow Road, the H Centre on Middle Road, the SHK tower under renovation for years on junction of Middle/Nathan Road, 2-6 Granville Road, the Grand Centre, 8 Humphreys, and these are just examples in TST. This does not comply with the non-profit making criteria.

That the project is designed to cash in on a site intended for community purposes is clear. There is much resentment in the community with regard to how land granted to religious and other bodies has been abused and that the services provided deviate from the original intention of the land grant at favourable terms.

As a general rule, for sites zoned "G/IC", a major portion of the proposed development should be dedicated to GIC and other public uses including public open spaces. Otherwise, the proposed development is considered to constitute a significant departure from the planning intention of the "G/IC" zone and, unless with very strong justifications and under special circumstances, planning permission for such development would not be granted.

If this project is allowed to go ahead then it should only proceed via a change of zoning to Commercial or "Other Specified Uses" annotated "Business" in line with the HKSK development in Shau Kei Wan with the implementation of a full land premium.

MOST OF THE PRIVATE HOSPITALS ARE "NON PROFIT MAKING". BUT THIS DOES NOT TRANSLATE INTO ANY BENEFIT FOR THE COMMUNITY, ON THE CONTRARY IT JUST MEANS THAT THEY PAY NO TAXES, SO ARE EFFECTIVELY A DRAIN ON THE COMMUNITY AS THEY ENJOY THE USE OF PUBLIC SERVICES LIKE ROADS WITHOUT MAKING ANY CONTRIBUTION TO THEIR UPKEEP. MOREOVER, THEY DO NOT PUBLISH THEIR ACCOUNTS SO THERE IS NO WAY FOR THE COMMUNITY TO GAUGE HOW PROFITS ARE DISBURSED.

DID THIS APPLICANT SUBMIT CERTIFIED ACCOUNTS WHEN QUESTIONED ABOUT ITS REVENUE?

This development is effectively another medical tower. TPB members are reminded that a number of these have encountered financial issues, Virtus and Your Health Specialist in recent years.

Urgent Return receipt Expand Group Restricted Prevent Copy

Manson Fok's Health Signature, Medical Group's IPO Dream Broken, Famous Doctors Jumping Ship Fortune Insight 2022-12-9

There is clearly an oversupply of such facilities and no need for additional premises.

Comments of the Secretary for Health received on 10.1.2023:

1. *In general, HHB encourages private hospitals to make effective use of their sites for enhancing service provision in order to increase the overall capacity of the dual-track healthcare system in Hong Kong, provide the public with more choices and affordable high quality private hospital services, and cope with the increasing service demand. Along such policy objectives, HHB has invited the Evangel Hospital to accept a set of minimum requirements, including the service scope, service target and price transparency measures etc., for the proposed development. In view of the Evangel Hospital's reply to HHB dated 6 December 2022 indicating **in-principle agreement to comply with most of the minimum requirements** (such as standard beds at packaged charges and price transparency etc.), HHB provides in-principle support to the planning application for the proposed hospital redevelopment."*

"and expand collaboration with non-governmental organisations (NGOs) to provide services to underprivileged groups"

So where are the details?

And this is the fundamental issue, a 'Gentlemen's Agreement', with no regulations in place with regard to transparency with regard to the so called NOT FOR PROFIT TAX EXEMPT institutions. No conditions with regard to provision of GENUINE community services.

The administration continues to ignore its duty to put into place mandatory conditions that tax exempted bodies publish annual accounts and information with regard to revenue, disbursements and identity of beneficiaries. It is shocking that small enterprises have to submit accounts but 'religious' institutions pocketing millions are exempt.

The naivety displayed by government depts and TPB with regard to funding issues is unacceptable. At the 4 July meeting the response to inquiries was that

"the Hospital experienced losses in several years"

"the estimated cost of the redevelopment was approximately HK\$3m"

"main source of funding included donations and fundraising"

"payment of land premium would impose a burden on the Hospital"

But no member questioned how an organization with such a poor fiscal track record could afford a \$3b project nor the ability to raise such a large sum.

The assumption of any hardnosed business person would be that in view of the fiscal limits and the substantial increase in the size of the development between 2023 and 2025 that the church has entered into an agreement with a 'silent partner', a fund manager or healthcare service provider, on

Urgent Return receipt Expand Group Restricted Prevent Copy

the lines of the deal forged between the Sheng Kung Hui and Virtus to develop a 300-bed hospital on the site of Central Hospital.

The development would ostensibly be carried out by the church until the land premium exemption is settled.

The hand wringing of these churches is taken at face value. It is not that long ago, Oct 2023, that the board lapped up the community-wash trotted out by the Island Evangelical Community Church in its bid to secure a land premium exempted HQ re development of the community building in 210 Java Road, North Point. The ink was hardly dry on this approval when the church got hold of the Sunbeam Theatre and dumped the Java Street plan leaving Lands Dept with egg on its face.

At the OZP meeting for this plan, tax payers would expect members to request concrete details of income/expenditure for the past five years, a realistic funding model and full disclosure of any participation on the part of silent investors and details of the support to be provided to community groups.

Mary Mulvihill

