

致城市規劃委員會：

支持將《觀塘(南部)分區計劃大綱核准圖編號 S/K14S/26》修訂項目 A

現時殘疾人士院舍尤為短缺，且多位於市郊，位置偏僻，難以照顧長者及其探訪者。
改劃地點交通便捷，有助提升殘疾人士及其家屬的生活質素，亦促進城市土地善用。
申請方案符合社會福利署床位及設計標準，無重大環境或交通影響。私人市場供應尤其重要，需加快推動優質殘疾人士院舍的發展。

姓名：潘百勤 潘百勤，
[REDACTED]

日期：2025 / 11 / 10
[REDACTED]

Town Planning Board
15th Floor, North Point Government Offices
333 Java Road
North Point, Hong Kong

Subject: Representation in respect of the Draft Kwun Tong (South) Outline Zoning Plan No. S/K14S/27 (Support to Proposed Amendment Item A)

Dear Sir/Madam,

We, Merry Gain International Limited, write to express our strong support for the Proposed Amendment Item A to the Approved Kwun Tong (South) Outline Zoning Plan No. S/K14S/26, which seeks to rezone a site at 90 Hung To Road from "Commercial (1)" ("C(1)") and "Other Specified Uses" annotated "Business" ("OU(B)") to "C(3)" to facilitate the partial in-situ conversion of an existing commercial building to a proposed social welfare facility (residential care home for people with disabilities) (RCHD) with ancillary office and staff quarters. This amendment aligns with pressing social needs, government policy initiatives and town planning considerations.

[1] Addressing the shortage of RCHD places

The critical shortage of RCHD places is well documented, with only 63 private RCHDs currently serving over 11,000 persons on the waiting list, a disparity nearly tenfold compared to Residential Care Homes for the Elderly (RCHEs). From 2022 to 2024, only one new privately-operated RCHD had been approved by the Town Planning Board, highlighting the challenges the sector faces. These include stiff opposition from Owners' Corporations and social resistance rooted in misconceptions about RCHD impacts, coupled with the lower turnover rate of RCHD residents compared to RCHEs.

The government's recent Policy Address, Budget proposals and legislative papers prioritize increasing RCHD supply, encouraging private sector participation, and integrating RCHD/RCHE within urban redevelopment to better serve the population. Unfortunately, new applications for private RCHD remain sparse, with only one private RCHD opening in 2023. The current proposal represents an important step in accordance with these initiatives to increase RCHD supply in urban area through in-situ conversion, which offers cost and time savings to meet urgent demand.

[2] Compatible to the surroundings

The Site is particularly well suited for the proposed RCHD use. The 6/F and 7/F of the Building are permitted to be used as domestic use under the land lease and in existence before the publication in the Gazette of the notice of the first statutory plan covering the land or building in 1987. The Building is erected in the same period as the immediate surrounding pre-1987 IBs. Despite being largely surrounded by manufacturing activities, its residential use has been considered acceptable.

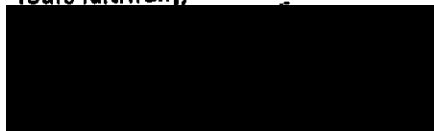
Given the fact that the surrounding area has evolved into a predominantly commercial and office district since 2001, the proposed partial conversion for RCHD development will likely encounter less nuisance than before. The subject Building is located at a relatively prime location facing Hung To Road and Tsui Ping River. With the proposed mitigation measures to tackle I/R Interface problem, the subject Building is suitable for the RCHD development.

[3] No adverse technical impacts

Potential adverse impacts on traffic and the neighbourhood environment have been well discussed in the S12A stage, with no objections from the Transport or Highways Departments and Fire Services Department. Anticipated environmental and technical concerns such as noise, air quality, sewerage and drainage can be addressed at the next application stage with appropriate mitigation measures.

We urge the Town Planning Board to approve the proposed amendment to facilitate timely development of this much-needed RCHD facility. Thank you for your kind consideration of this representation.

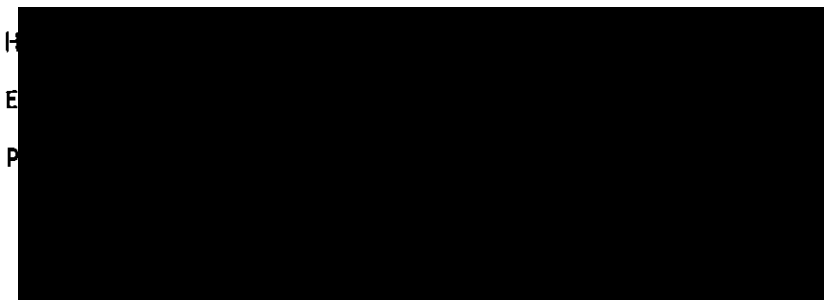
Yours faithfully,




Authorized Signature (with Company Chop)

Merry Gain International Limited

Authorized Representative: YEUNG CHUN WANG Yeung Chun Wang



tpbpd/PLAND

寄件者: [REDACTED]
寄件日期: 2025年11月11日星期二 3:25
收件者: tpbpd/PLAND
主旨: AMENDMENTS TO THE KWUN TONG (SOUTH) OZP NO. S/K14S/26
類別: Internet Email

AMENDMENTS TO THE KWUN TONG (SOUTH) OZP NO. S/K14S/26

Dear TPB Members,

Item A – Rezoning of a site at Hung To Road from “Commercial (1)” (84.5%) and “Other Specified Uses” annotated “Business” (15.5%) to “C(3)”. Social Welfare Facility RCHD (120 – 180 beds + Staff Quarters) / 457.56m² / PR 12 / 100mPD

Y/K14S/2 partially agreed 20 Sept 2024.

Fully support the proposed conversion. This is an ideal location for such a facility as the more mobile residents, or those who have visitors to assist them, can avail of the open-air facilities at Tsui Ping River Garden Laguna Park and more distant waterfront facilities.

The traffic issue is no worse than that related to the many residential developments that have been approved for sites close to busy highways and railway lines and where the solution has been the inevitable acoustic windows, etc. In addition the unobstructed views on the river side provide visual stimulation and natural light that is usually lacking in the facilities accommodated in podiums of high rises.

However, it is not clear why the rezoning is “C” when the intended use is community and “GIC” would be more appropriate. The impression is that the RCHD use is only temporary in nature with future plans to redevelop the building to commercial use via retention of the PR and BHR. This is a matter of concern as it would impact the well-being of long-term residents who would be forced to relocate, always traumatic for the disabled, particularly those with mental health issues.

In fact, this factor is highlighted in the presentation of the applicant:

“The limited supply of RCHD stemmed from various challenges, including

- opposition from the Owners’ Corporations against the provision of RCHD;
- social resistance due to misunderstandings about the social impacts of RCHD; and
- the **lower turnover rate of residents in RCHD** compared to RCHE

Note that (iii) underlines the need for stability of tenure.

☐Urgent ☐Return receipt ☐Expand Group ☐Restricted ☐Prevent Copy

Re the restaurant on the ground floor, many such commercial facilities have been approved by the board on "GIC" zonings, particularly for educational establishments so this would not be an unsurmountable obstacle.

That a "GIC" zoning might be more appropriate was not discussed at the meeting.

Members should instigate alternative solutions instead of following the recommendations of the applicants with vested interests and PlanD. The long-term interests of the residents should be the primary consideration

Amendments to the Notes of the Plan

(b) Incorporation of 'Social Welfare Facility (not elsewhere specified) (on land designated "Comm (3)" only)' under Col 2 of the Notes for "C" zone.

SUPPORT ONLY IF THE ZONING IS APPROVED.

(c) Incorporation of 'Government Use (not elsewhere specified)' under Col 1 of Schedule I of the Notes for "OU(B)" zone; and corresponding deletion of 'Government Use (Police Reporting Centre, Post Office only)' under Col 1 and 'Government Use (not elsewhere specified)' under Col 2 of Schedule I of the Notes for "OU(B)" zone.

STRONG OBJECTIONS. YET ANOTHER PLOY THAT ALLOWS THE GOVERNMENT TO OPERATE WITHOUT ANY ACCOUNTABILITY AND TO AVOID THE SCRUTINY OF THE COMMUNITY. THIS AMENDMENT WOULD ALLOW ANY TYPE OF GOVERNMENT ACTIVITY TO BE INTRODUCED REGARDLESS OF WHETHER IT IS APPROPRIATE OR WELCOMED BY OTHER STAKE HOLDERS.

Mary Mulvihill
