

TPB/R/S/K22/URA2/1-
1

就草圖作出申述
Representation Relating to Draft Plan

參考編號
Reference Number: 230501-233031-73453

提交限期
Deadline for submission: 03/05/2023

提交日期及時間
Date and time of submission: 01/05/2023 23:30:31

「申述人」全名
Full Name of "Representer": 先生 Mr. Lee Kwan Shing

「獲授權代理人」全名
Full Name of "Authorized Agent":

與申述相關的草圖
Draft plan to which the representation relates: S/K22/URA2/1

申述的性質及理由
Nature of and reasons for the representation:

有關事項 Subject Matters	性質 Nature	理由 Reason
重建項目	支持 Support	<ul style="list-style-type: none"> -重建項目將改善周邊地區的舊房屋和老舊設施，重建現代化的住宅、商業和社區設施，提高居住品質和生活條件。居民可以享受到更舒適、便利和現代化的居住環境。 -重建可以消除或減少害蟲和鼠患的繁殖地，從而減少害蟲和鼠患的問題。 -增加道路寬度和改善交通流量，有助於緩解交通擁堵問題。 -項目是香港城市更新計劃的一部分，通過重建和更新老舊社區，促進城市更新和現代化發展，提高城市形象和品質。 -重建項目增加通風走廊可以增加海邊對區內空氣對流，進一步改善區內的空氣質量從而減輕空氣污染的問題。 -增加地積比，間接提高土地供應，令市區土地使用效率更高 -增設地下停車場以改善區內車位不足及違泊問題
海濱長廊發展	支持 Support	<ul style="list-style-type: none"> -重建項目將連接啟德及海心區海濱長廊，亦於項目內興建海濱廣場，為居民和遊客提供休閒選擇。 -提高海濱地區的景觀質量和公共設施

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增加就業機會	水平，吸引更多的遊客前來旅遊和消費，促進當地旅遊業的發展。
	項目的建設和運營階段將提供就業機會，促進就業和經濟增長。項目還將引入新的商業和服務設施，為當地居民提供更多的就業機會和商機。
對草圖的建議修訂(如有的話)	
Proposed Amendments to Draft Plan(if any):	

TPB/R/S/K22/URA2/1-
2



PLANNING LIMITED
規劃顧問有限公司

Our Ref: S3090/K22_URA2/001Lg

28th April 2023

By Hand

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



Dear Sir/Madam,

**Submission of Written Representation in respect of
Draft Urban Renewal Authority To Kwa Wan Road / Ma Tau Kok Road
Development Scheme Plan No. S/K22/URA2/1**

This Written Representation is prepared and submitted on behalf of Kum Shing Group Limited (the "Representer"), under Section 6(1) of the Town Planning Ordinance ("TPO") in relation to the Draft Urban Renewal Authority To Kwa Wan Road/Ma Tau Kok Road Development Scheme Plan (the "Draft DSP") No. S/K22/URA2/1 gazetted on 3 March 2023. This Written Representation is made in respect of the proposed rezoning from "Comprehensive Development Area" ("CDA") zone to "Residential (Group A)" ["R(A)"] zone with a maximum plot ratio ("PR") restriction of 7.5 (6.5 for domestic and 1.0 for non-domestic uses).

The Representer is one of the owners at Newport Centre, which falls within the KC-019 Scheme Area bounded by Ma Tau Kok waterfront to the east, To Kwa Wan Road to the west and Ma Tau Kok Road to the south. Newport Centre is a six-storey (including one-basement level) industrial building ("IB") completed in 1979 to 1981 (i.e. about 40 years old).

In view of the tight housing supply in Hong Kong and the need for urban renewal, the Representer appreciates Urban Renewal Authority's ("URA") efforts to initiate redevelopment projects for residential, retail, government, institution or community ("GIC") and public open space/waterfront promenade use. Nonetheless, we consider that there is room for improvement in the Draft DSP to respect the existing context and ensure a more balanced and sustainable approach to urban renewal.

Overemphasis on Housing Supply

Unlike other URA ordinary residential redevelopment projects aiming to replenish housing stock by redeveloping dilapidated residential / composite buildings, the Newport Centre covered by the Draft DSP is an active and relatively young industrial building with many well-established business operations. We note that the Draft DSP follows URA ordinary approach





and focuses primarily on providing more residential units by rezoning the KC-019 Scheme Area (i.e. Representation Site) to "R(A)" zone to enable the development of residential towers on top of two separate three-storey-podium of commercial / retail/ GIC facilities uses. Despite the existing IB in KC-019 Scheme Area would be affected, there is no specific measure in the Draft DSP to take care and address the needs of the affected stakeholders (i.e. the displaced business operators). The Draft DSP creates hardship for the affected business operators and overlooks the potential impact of business closures and job losses associated with the redevelopment of the existing IB. Whilst To Kwa Wan / Ma Tau Kok Area is a pronounced aged residential area with small entrepreneurs and business activities within the area, the Draft DSP should not only focus on providing more housing units but also providing floor areas to retain employment opportunities, apart from general retail and commercial jobs. A holistic development with the balance of housing supply and job opportunities would be required rather than pure residential use with retails provisions.

Potential Loss of Job Opportunities

As reported in the media, To Kwa Wan / Ma Tau Kok area has attracted numerous small to large-scale manufacturing / workshops, warehouses / storages and offices that provide vital employment opportunities to the local communities due to the relatively convenient location and inexpensive rent. Newport Centre is actually a microcosm of To Kwa Wan / Ma Tau Kok area, and is home to a wide range of local industries, including printing companies, food factories, paper effigy factories, engineering companies, showrooms, garages and the "Berlin", which produced the first Hong Kong-made water heater and was established in Newport Centre for over 40 years. According to a recent survey conducted by a local NGO, Newport Centre is estimated to be 90% occupied, which echoes with the last survey conducted by Planning Department ("PlanD") under the "2020 Area Assessments of Industrial Land in the Territory" (the "2020 Area Assessment").

The Need for Relocation Space for Affected Business Operations

After the gazette of the Draft DSP, the public and the affected business operators have been deeply concerned about the suitable premises for relocation and the potential business closures. The 2020 Area Assessment conducted by PlanD reported that nearly half of the surveyed operators (47.1%; 594 out of 1,261 surveyed units) in the To Kwa Wan / Ma Tau Kok area (viz. Site C6, Site D6 and Site E3) indicated that they would intend to seek another premises to continue their operation if the existing IBs were to be redeveloped (**Table 1** and **Figure 1** refer). There is a genuine pressure for finding suitable relocation space to continue operation.

Nearby IBs in To Kwa Wan / Ma Tau Kok Area Are Not Suitable Alternatives

The Stage 2 Social Impact Assessment of the Draft DSP reported that the type of business identified within KC-019 Scheme Area are commonly found within many IBs in the vicinity. It is possible for the displaced business operators to find suitable premises in the surrounding IBs to continue their businesses. It is also learnt that the URA's subsidiary, namely Urban Redevelopment Facilitating Services Company Limited, would help the affected operators to



identify suitable premises to relocate and continue their operations within the same area as far as possible. Nonetheless, it is observed from the survey that the space required by some of the affected operations may require larger space to continue their operations. With fewer IBs in the vicinity and in other urban areas, this would inevitably force some affected operators to seek suitable premises in the New Territories. This would not only be inconvenient for the affected operators but also increase logistics costs and affect the original customer network.

We also note that the IBs in To Kwa Wan / Ma Tau Kok area fall within areas zoned "CDA", "R(A)" and "Residential (Group E)" ["R(E)"] (**Figure 2** refers), and they are all intended to be phased out for residential developments. They are all subject to redevelopment pressure.

Moreover, as shown in **Figure 3**, most of the nearby IBs were built earlier than Newport Centre, and almost all of them are in only "fair" building condition according to the latest survey conducted under the 2020 Area Assessment. The Representer reasonably expects that these IBs will be redeveloped soon as well. Given this situation, even if some of these affected business operators could find alternative premises from the IBs in the vicinity, the displaced businesses may be forced to move out again in the near future due to redevelopment. This would create instability and uncertainty for business operators. In fact, the Town Planning Board ("TPB") has recently approved several planning applications for the redevelopment of the IBs into residential developments. It is foreseeable that the nearby IBs in To Kwa Wan / Ma Tau Kok area would be insufficient to accommodate all displaced businesses, forcing many to seek premises in other districts.

Adoption of Mixed Use Approach for Urban Renewal

We believe that a more comprehensive and inclusive urban renewal approach shall be explored to encourage mixed use development for redevelopment schemes involving IBs. The URA, as the authority vested with statutory power driving the urban renewal, should take a more proactive approach to reserve more GFA for the those affected operators within KC-019 Scheme Area.

We therefore suggest that it would be more appropriate to rezone the Representation Site from "CDA" to "Other Specified Uses" annotated "Mixed Use" ("OU(MU)") zone instead of "R(A)" zone to allow for a wider range of non-domestic uses in Column 1 with proper physical segregation. A higher total PR, say up to maximum PR of 9, could also be considered with reference made to the development intensity of neighbouring sites in To Kwa Wan / Ma Tau Kok area (**Figure 4** refers). The URA could then revise the Draft DSP to achieve a greater and more balanced mixed use development that could respond to the needs of affected operators and the changing circumstances, thereby supporting local businesses and allowing business operators to return to the Representation Site to continue operations and retain jobs.

In conclusion, we believe that the proposed recommendations to the Draft DSP would offer a more balanced and sustainable approach to urban renewal, ensuring that the area remains a thriving community with diverse job opportunities within the KC-019 Scheme Area to offset the impact of job loss from the redevelopment proposal.



PLANNING LIMITED
規劃顧問有限公司

Our Ref: S3090/K22_URA2/001Lg
Date: 28th April 2023

Meanwhile, should you have any queries in relation to the above, please do not hesitate to contact the undersigned.

Thank you for your kind attention.

Yours faithfully
For and on behalf of
KTA PLANNING LTD

A handwritten signature in blue ink, appearing to read 'David FOK'.

David FOK

cc. the Representer & Team

PL/DK/HT/vy

Table 1 - Questionnaire Survey Findings (Source: 2020 Area Assessment)

Industrial Site	Intended to continue operate	Not intended to continue operate	No Decision Yet	Total No. of Respondents
C6	88 (64.7%)	11 (8.1%)	37 (27.2%)	136
D6	425 (44.8%)	124 (13.1%)	400 (42.1%)	949
E3 (including Newport Centre)	81 (46.0%)	5 (2.8%)	90 (51.1%)	176
Total	594 (47.1%)	140 (11.1%)	527 (41.8%)	1,261

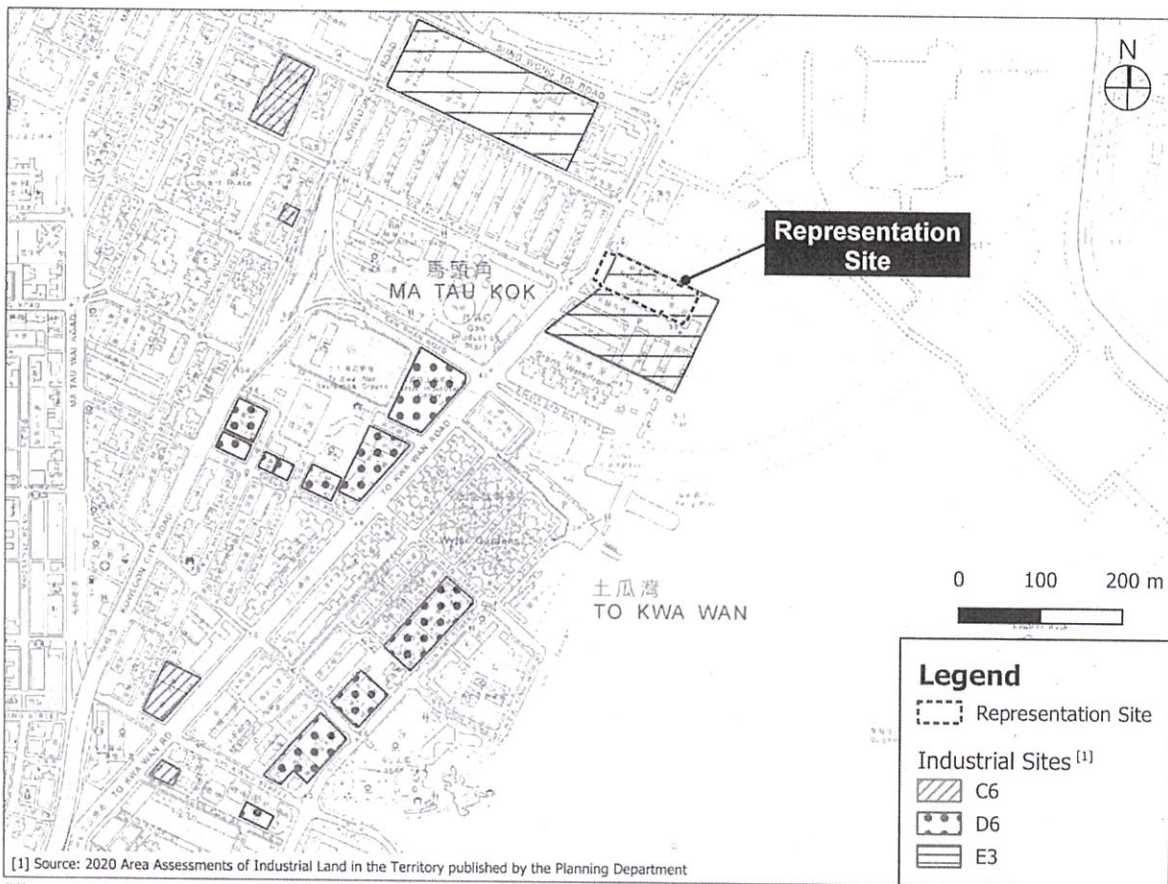


Figure 1 – Nearby Industrial Sites in To Kwa Wan / Ma Tau Kok Area

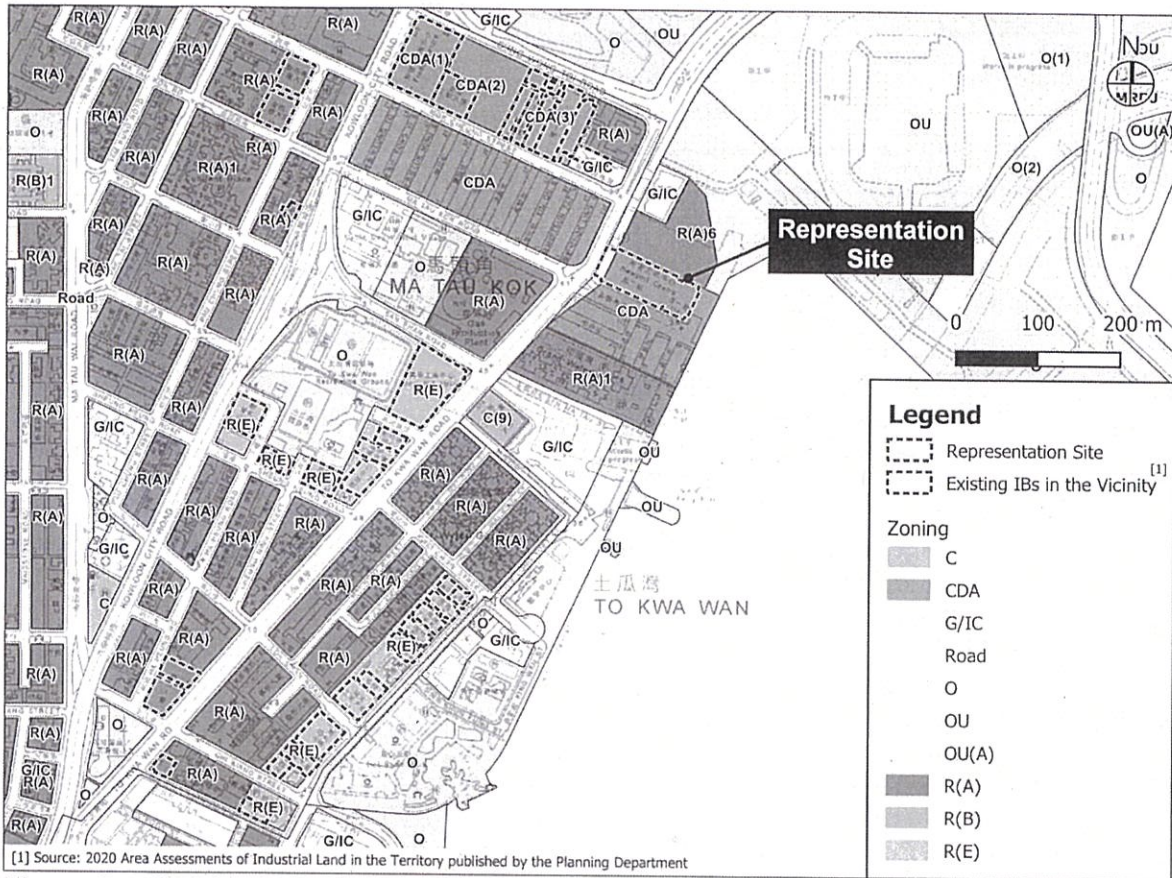


Figure 2 – Nearby IBs & Zoning Context in To Kwa Wan / Ma Tau Kok Area

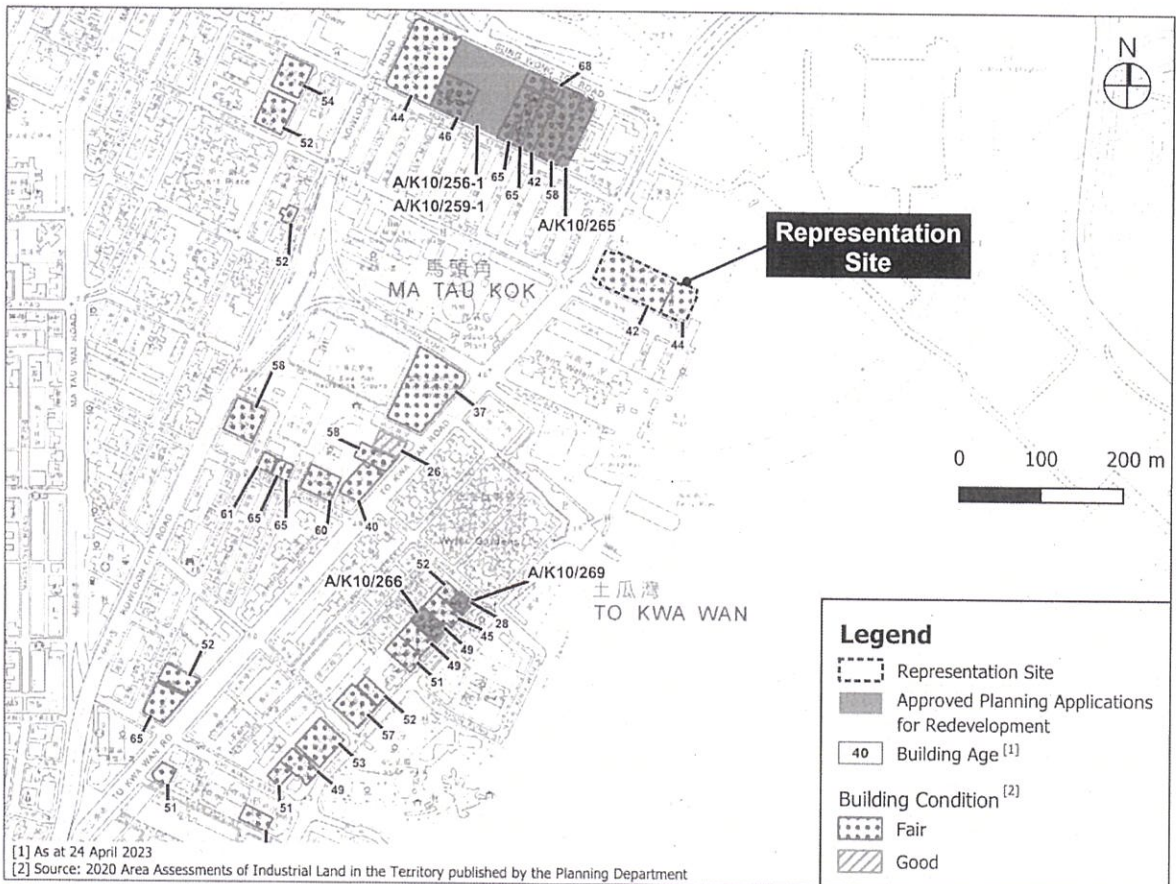


Figure 3 – Building Age and Conditions of Nearby IBs & Approved Planning Applications in To Kwa Wan / Ma Tau Kok Area

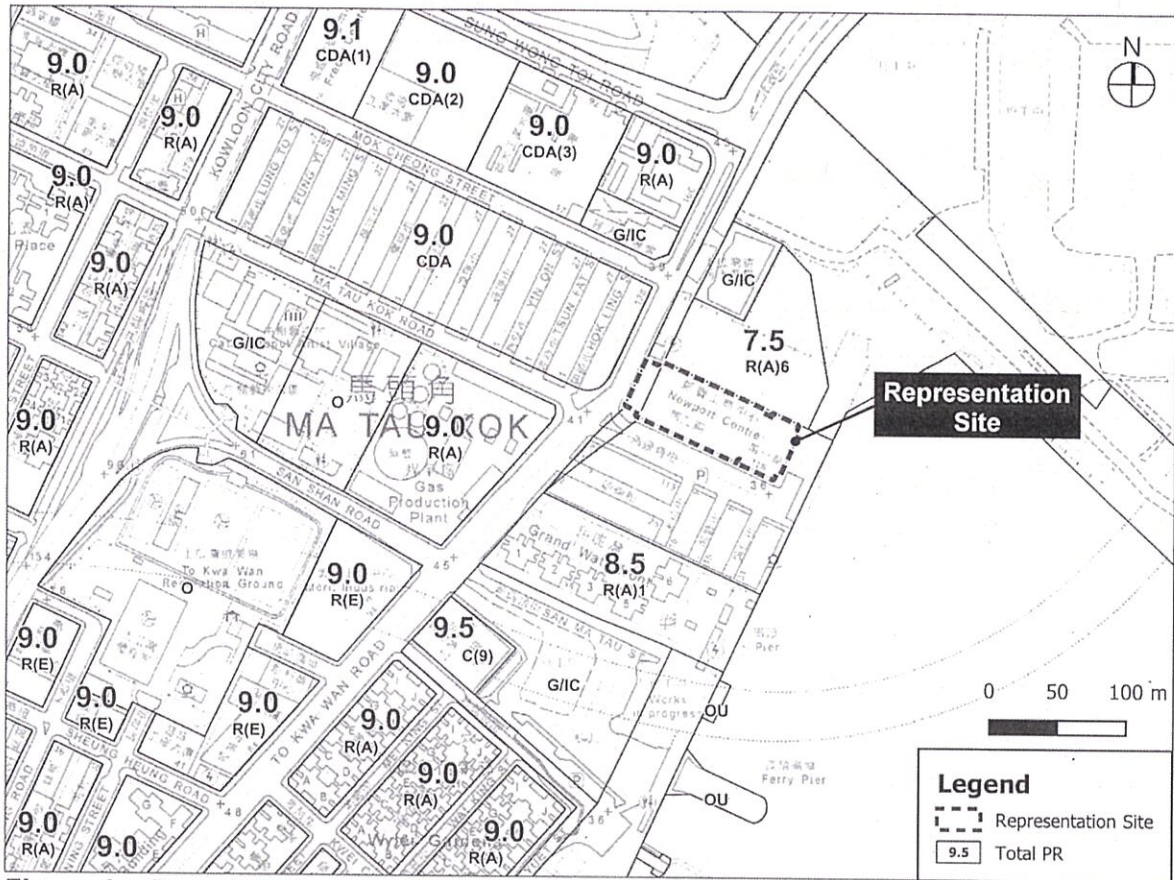


Figure 4 – Development Intensity of Neighbouring Sites in To Kwa Wan / Ma Tau Kok Area

**REPRESENTATION IN RESPECT OF
DRAFT PLAN UNDER SECTION 6(1) OF
THE TOWN PLANNING ORDINANCE (CAP. 131)**

根據《城市規劃條例》(第131章)
第6(1)條就草圖作出申述

For Official Use Only 請勿填寫此欄	Reference No. 檔案編號	
	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 Publication of Representations, Comments on 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 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.info.gov.hk/tpb/>.
填寫此表格之前, 請先細閱有關「根據城市規劃條例提交及公佈申述、對申述的意見及進一步申述」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.info.gov.hk/tpb/>)。
- This form can be downloaded from the Board's website, and obtained from the Secretariat of the Board and the Planning Enquiry Counters 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。

1. Person Making this Representation (known as "Representer" hereafter) 提出此宗申述的人士 (下稱「申述人」)

Full Name 姓名 / 名稱 (Mr./Ms./Company/Organisation* 先生/女士/公司/機構*)

Kum Shing Group Limited

(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)

2. Authorised Agent (if applicable) 獲授權代理人(如適用)

Full Name 姓名 / 名稱 (Mr./Ms./Company/Organisation* 先生/女士/公司/機構*)

KTA Planning Limited

(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)

3. Details of the Representation 申述詳情

Draft plan to which the representation relates (please specify the name and number of the draft plan)
與申述相關的草圖 (請註明草圖名稱及編號)

Draft Urban Renewal Authority To Kwa Wan Road/Ma Tau Kok Road Development Scheme Plan No. S/K22/URA2/1

* 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」

3. Details of the Representation (Continued) (use separate sheet if necessary)[#]
申述詳情(續) (如有需要, 請另頁說明)[#]

Nature of and reasons for the representation 申述的性質及理由

Subject matters 有關事項 [@]	Are you supporting or opposing the subject matter? 你支持還是反對有關事項?	Reasons 理由
Rezoning Proposal: - From "CDA" to "R(A)" zone - Plot ratio restriction	<input type="checkbox"/> support 支持 <input checked="" type="checkbox"/> oppose 反對	Please refer to the attached Written Representation.
	<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 draft plan? If yes, please specify the details.
 對草圖是否有任何擬議修訂? 如有的話, 請註明詳情。

Please refer to the attached Written Representation.

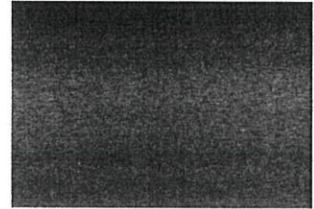
[#] If supporting documents (e.g. colour and/or large size plans, planning studies and technical assessments) is included in the representations, 90 copies (or 40 hard copies and 50 soft copies) of such information shall be provided.
 若申述附有支持其論點的補充資料(例如彩色及/或大尺寸的圖則、規劃研究及技術評估), 則須提供 90 份複本(或 40 份印文本和 50 份電子複本)。

[@] 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。

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



金城營造集團
Kum Shing Group



28 th April 2023

KTA Planning Limited
Unit K, 16/F, MG Tower
133 Hoi Bun Road
Kwun Tong

Dear Sir/Madam,

**Submission of Written Representation in respect of
Draft Urban Renewal Authority To Kwa Wan Road / Ma Tau Kok Road
Development Scheme Plan No. S/K22/URA2/1**

We are pleased to appoint KTA Planning Limited ("KTA") as the Planning Consultant to prepare and submit the above Written Representation relating to the Draft Urban Renewal Authority To Kwa Wan Road / Ma Tau Kok Road Development Scheme Plan No. S/K22/URA2/1 on our behalf. KTA is hereby authorised to liaise and correspond with relevant Government Departments and the Town Planning Board regarding the captioned Written Representation.

Yours faithfully
For and on behalf of
Kum Shing Group



(Authorised Signature with Company Chop)



香港中華煤氣有限公司
The Hong Kong and China Gas Company Limited

TPB/R/S/K22/URA2/1-

3



2nd May 2023

Our Ref. GPD-MTK/TPB/23/011

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



Dear Sir,

Re: Representations on Draft Urban Renewal Authority Ming Lun Street/Ma Tau Kok Road Development Scheme Plan S/K22/URA1/1 and To Kwa Wan Road/Ma Tau Kok Road Development Scheme Plan S/K22/URA2/1

We are writing to raise our objection to the two draft Development Scheme Plans Nos. S/K22/URA1/1 and S/K22/URA2/1 (Draft DSPs) of the Urban Renewal Authority (URA) gazetted on 3 March 2023 in the capacity as the owner and operator of the Ma Tau Kok Gas Production Plant (the **MTK Plant**).

The above two Draft DSPs (the Sites) are within the 300m radius Consultation Zone of the MTK Plant, which is classified under the Hong Kong Planning Standards and Guidelines (HKPSG) as a Potentially Hazardous Installation (PHI).

The MTK Plant includes primarily town gas production units of total daily capacity of 2.6 million cubic metres using naphtha and natural gas as feedstock. It is amongst the major gas manufacturing facilities to ensure the safety and continuity of reliable gas supply to Hong Kong and plays an important role in sustaining the gas supply in the winter peaks as well as a critical backup to other production facilities.

URA expressed in their Planning Report that they intend to implement the two Draft DSPs together as one inclusive redevelopment. On this basis, Towngas considers it more meaningful to address our objection to the two Draft DSPs collectively in one single Representation.

Significant increase in population in the Site

The Sites are proposed to be rezoned from existing CDA to Residential (Group A) which is primarily intended for comprehensive high density residential development as well as retail uses and government, institution or community (GIC) facilities at the lowest three floors. Amongst other changes, URA further proposed a relaxation of the maximum building height to 120mPD from the existing 65mPD and 110mPD.

Apart from a waterfront promenade of not less than 20m wide on the eastern side of the Draft DSPs for public enjoyment, the Planning Report revealed another feature which is an at-grade

waterfront plaza of about 25 to 40 metres wide and about 120 metres long in-between the two Draft DSPs. This waterfront plaza of over 3,500 sq.m. will create dedicated pedestrian and activity zones connecting Tokwawan Road, areas for retail uses in the Draft DSPs and those in the Dedicated Rehousing Estate (DRE) of Hong Kong Housing Society (HKHS) to the north, the waterfront promenade as well as the Kai Tak Sports Park adjacent to the PHI Consultation Zone of MTK Plant. The above layout combination of retails/shops/at-grade plaza and promenade will attract transient populations like visitors and pedestrians on nearby roads, pavement and open space near the MTK Plant. Based on the report on "Harbour Connectivity" by the Development Bureau to the Legislative Council on 28 February 2023, we believe this waterfront plaza, upon completion, will be a major ingress/egress route for the promenade in the Kowloon East areas.

Coupled with the increase of 2,226 residential flats and over 5,100 domestic population, the potential impact on **safety** of the significantly increased population must be one of the material factors which shall be considered carefully by the Town Planning Board (TPB) in considering the two Draft DSPs, amid other recent developments approved by TPB or in the process of circulation.

Objection to the proposed DSPs and re-zoning

We would like to raise our objections on the following grounds:

1. Inadequate justifications to address "safety" concern

- (a) While the main portion of the URA's Planning Report addresses other technical issues, such as the impact on traffic, visual, landscape, road traffic noise, fixed noise, air quality, air ventilation, sewage, drainage, water supply, the important issue of safety has not been justified in depth. It is only mentioned in paragraphs 6.14 to 6.16 on page 20, supplemented only by a brief Appendix 9.
- (b) Paragraph 6.14 stated that the Coordinating Committee on Land-use Planning and Control Relating to Potentially Hazardous Installations (CCPHI) endorsed a QRA report in August 2021 in regard to potential residential developments which covered the areas of the two Draft DSPs.
- (c) Paragraph 6.15 further stated that "a set of QRA Technical Notes (TN)" was prepared in Appendix 9 and that according to the TN, the two DSPs would not adversely affect the risk levels as compared with the assessment in the endorsed QRA report in August 2021.
- (d) Nonetheless, we observed and would like to highlight the followings:
 - i. Departing from normal practices amongst government departments and other statutory bodies, when the URA stated in the Planning Report that the CCPHI has endorsed a QRA in 2021 in support of its conclusion that such development would not impose safety concerns, URA did not provide a written support or statement from CCPHI, or any relevant authorities.
 - ii. While the 2021 QRA report endorsed by CCPHI formed the fundamental support and basis in addressing the safety and risk issue of the related

development in the Draft DSPs, the complete 2021 QRA report, or at least the Executive Summary and other relevant sections, should be included in the Planning Report like other reports for analyzing the technical impact.

- iii. In so far as risk analysis is concerned, the approach of “usual QRA” in the industry denotes “**Quantitative**” Risk Analysis, which is the requirement of the HKPSG in order to analyze the associated risk within the Consultation Zone of a PHI and confirm that the risk is acceptable. However, we note the “QRA” Technical Note (TN) referred by paragraph 6.15 attached in Appendix 9 is merely a set of “**Qualitative Appraisal of Risk Impact – Technical Note**”. No sound details nor analysis is included to justify why the risk is acceptable. In essence, no supporting quantitative figures or details whatsoever have been given in the Planning Report to substantiate the statement given.

More importantly, based on the FN curve attached in the above TN from the QRA approved in 2021, we can estimate that the additional hazard posed to the Consultation Zone is substantial (**Potential Loss of Life/PLL increased by over 38% from $9.5e^{-04}$ to approximately $1.3e^{-03}$**). According to our past negotiation with the Government on projects adjacent to the MTK Plant, such drastic increase in risk level has traditionally not been approved even if the calculated risk is still in the “As Low As Reasonably Practicable” zone.

- iv. Apart from indoor population, increased pedestrian population on-site of the Draft DSPs will be a major factor contributing to the increase in societal risk since they are usually not protected by any shelter as far as risk analysis is concerned. It is unclear whether the 2021 QRA that URA Planning Report relies on, had incorporated the on-site outdoor population in the proposed massive waterfront plaza and activity zones in-between the two Draft DSPs.
- v. In the Conclusion of the TN in Appendix 9, mitigation recommendation in 3.1.4 (ii) suggested that “**at grade bench/siting-out areas facing MTK Plant should be minimized**”. This demonstrates there are already concerns on hazard on transient pedestrian population at locations facing the gas production plant. However, the proposed waterfront plaza in-between the two Draft DSPs across the Tokwawan Road is directly facing the MTK Plant with no shelter. There is a contradiction between the design of the DSPs and the TN conducted by the URA.

2. Absence of emphasis on risk assessments due to close proximity between the Sites and PHI

- (a) “Safety” is always the top priority of Towngas as a responsible public utility. The MTK Plant dated back to the 1950s and has been operated with the highest world class safety track record while Towngas continually invests in upgrading and enhancing plant operation to upkeep the safety level when the surrounding is

changing and developing rapidly. Throughout all these evolutions, the safety to our neighborhood has never been compromised, and has been maintained by the implementation of prudent and stringent QRA methodology to assess the changes and to determine and adopt appropriate necessary mitigation measures, no matter the modification was arising from Towngas ourselves or development proposed by third party project proponent.

- (b) Putting the matter in context, we further highlight the following salient points concerning risk assessment:
- (i) According to paragraph 4.3.3 of Chapter 12 of the HKPSG, sizeable” developments are normally **NOT** approved within the consultation zone of a PHI.
 - (ii) HKPSG requires development proposal in the consultation zone be assessed against the Government risk guidelines to ensure that the risks to the public are confined to within acceptable limits. Where the risk guidelines cannot be met, necessary mitigation measures should be considered to bring the risk level down.
 - (iii) Substantial increases of risk in such a highly densely populated city zone is by no means acceptable to the public and therefore determination of the "acceptable levels" does NOT base solely on the risk guidelines set out in HKPSG. For the MTK Plant or projects in close proximity to it, in the past if the risk level, after taking into account all mitigation measures proposed by the relevant project proponent, still falls within the "As Low As Reasonably Practicable (ALARP)” region but result in substantial increase in PLL, the project would traditionally not be approved by the authority.
 - (iv) We are further concerned whether the increasing risk of vandalism/sabotage as we experienced a few years ago has been taken into account. We estimate that if this is considered, the societal risk may even fall into the unacceptable zone.

Conclusion

Towngas recognises and appreciates there is a strong voice in Hong Kong society for increasing supply of land for housing development. However, ignoring or underestimating the potential increase in societal risk by placing another large development close to a PHI may be considered an unsafe act.

Nevertheless, Towngas reckons that for long-term city planning and urban development of the Ma Tau Kok area, the proposed re-zoning of the site referred to in the two Draft DSPs as “Residential” has its own merits to be supported. However, this proposal can only be met with major changes to be incurred at the MTK plant and associated facilities to ensure safety requirements can duly be met to allow the subject site to be redeveloped to its full capacity, and such changes will need acceptance and support from the government. Towngas is willing to work with the government to seek possibilities to enable the redevelopment potential in the sites

neighbouring the MTK gas plant to be realised. Along this development, Towngas may consider withdrawing this representation if our safety concerns can be addressed and Towngas be consulted closely in the execution of the subject development projects.

Proposed Amendments

Towngas is prepared to withdraw the Representation on condition that the amendment is made on the approved Kai Tak Outline Zoning Plan No. S/K22/8 that:

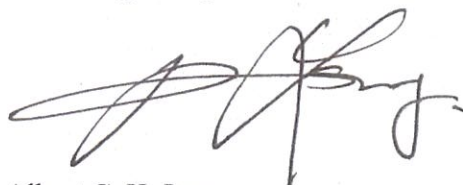
1. The URA draft development scheme area (Ming Lun Street/Ma Tau Kok Road and To Kwa Wan Road/Ma Tau Kok Road) is designated as “**Residential (Group A) 7**”;
2. The Remarks (2) of the Residential (Group A) zone of the approved Kai Tak Outline Zoning Plan No. S/K22/8 be amended to add:

Sub-area	Maximum Domestic Plot Ratio	Maximum Non-Domestic Plot Ratio	Maximum Site Coverage (excluding basement(s))
Residential (Group A)7	6.5	1.0	65%

3. The Remarks (5a) to be added that:
“On land designated “Residential (Group A)7” at Ming Lun Street/Ma Tau Kok Road and To Kwa Wan Road/Ma Tau Kok Road, a Quantitative Risk Assessment (QRA) must be submitted to the satisfaction of the Government and Towngas.
4. The Explanatory Statement of the approved Kai Tak Outline Zoning Plan No. S/K22/8 covering the Residential (Group A) zone in paragraph 9.3 be correspondingly amended to add the newly designated **Residential (Group A) 7** together with **the requirements to submit the Quantitative Risk Assessment** to the satisfaction of the Government and Towngas.

We believe by accepting our proposed amendments, the aforesaid URA projects can be proceeded and at the same time, the community safety will not be compromised.

Yours faithfully,
 For and on behalf of
The Hong Kong and China Gas Company Limited



Albert C. K. Leung
 Deputy General Manager – Ma Tau Kok Plant

AL/CK/kc

Form No. S6
表格第 S6 號

**REPRESENTATION IN RESPECT OF
DRAFT PLAN UNDER SECTION 6(1) OF
THE TOWN PLANNING ORDINANCE (CAP. 131)**

根據《城市規劃條例》(第131章)
第6(1)條就草圖作出申述

For Official Use Only 請勿填寫此欄	Reference No. 檔案編號	
	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 Publication of Representations, Comments on 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 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.info.gov.hk/tpb/>.
填寫此表格之前, 請先細閱有關「根據城市規劃條例提交及公佈申述、對申述的意見及進一步申述」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.info.gov.hk/tpb/>)。
- This form can be downloaded from the Board's website, and obtained from the Secretariat of the Board and the Planning Enquiry Counters 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。

1. Person Making this Representation (known as "Representer" hereafter) 提出此宗申述的人士(下稱「申述人」)	
Full Name 姓名 / 名稱 (Mr./Ms./Company/Organisation* 先生/女士/公司/機構*)	
The Hong Kong and China Gas Company Limited	
(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)	
2. Authorised Agent (if applicable) 獲授權代理人(如適用)	
Full Name 姓名 / 名稱 (Mr./Ms./Company/Organisation* 先生/女士/公司/機構*)	
NA	
(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)	
3. Details of the Representation 申述詳情	
Draft plan to which the representation relates (please specify the name and number of the draft plan) 與申述相關的草圖(請註明草圖名稱及編號)	Draft Urban Renewal Authority Development Scheme Plans (S/K22/URA1/1 and S/K22/URA2/1)

* 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」

3. Details of the Representation (Continued) (use separate sheet if necessary) [#] 申述詳情(續)(如有需要,請另頁說明) [#]		
Nature of and reasons for the representation 申述的性質及理由		
Subject matters 有關事項 [@]	Are you supporting or opposing the subject matter? 你支持還是反對有關事項?	Reasons 理由
The whole DSPs.	<input type="checkbox"/> support 支持 <input checked="" type="checkbox"/> oppose 反對	Please refer to our Letter on Objection reference no. GPD-MTK/TPB/23/011 dated 2 May 2023.
	<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 draft plan? If yes, please specify the details. 對草圖是否有任何擬議修訂? 如有的話,請註明詳情。		
Please refer to our letter reference no. GPD-MTK/TPB/23/011 dated 2 May 2023.		

[#] If supporting documents (e.g. colour and/or large size plans, planning studies and technical assessments) is included in the representations, 90 copies (or 40 hard copies and 50 soft copies) of such information shall be provided.
若申述附有支持其論點的補充資料(例如彩色及/或大尺寸的圖則、規劃研究及技術評估),則須提供 90 份複本(或 40 份印文本和 50 份電子複本)。

[@] 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。

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

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DRAFT URA TO KWA WAN ROAD/MA TAU KOK ROAD DEVELOPMENT
SCHEME PLAN NO. S/K22/URA2/1 KC-019
03/05/2023 03:12

From: [REDACTED]
To: tpbpd <tpbpd@pland.gov.hk>
File Ref:

DRAFT URA TO KWA WAN ROAD/MA TAU KOK ROAD DEVELOPMENT
SCHEME PLAN NO. S/K22/URA2/1 KC-019

Dear TPB Members,

The board has launched a public consultation that in view of the manner in which the paper has been presented is clearly intended to deter any but the most determined members of the community from participating.

A whopping 843 page document with no search function and no copy and paste. Consequently anyone who relies on a simple home computer and does not have access to a printer faces almost insurmountable problems in understanding the issues.

The paper should have been split into components, particularly the 10 Appendix, each of which should be accessible on a separate link and include a search function.

I made numerous attempts to download the mega file. This took around 20 minutes and the download failed on many attempts. When a download was achieved scrolling through the reports was slow as every illustration included took time to appear on the screen. With no search function there was no way to identify pages of interest via key words.

Site Area: 8,759sq.m (7,816sq.m for PR calculation)

Zoning: CDA

2 Towers 950 Units / Retail Podium / PR 7.5 / 120mPD / 324 Vehicle Parking

Strong objections to the miniscule allocation to GIC, a mere 500sq.m, less than one fifteenth of the GFA to be devoted to retail. The combined GIC for this development together with KC-019 is just over 1% of the GFA. Compare this to the Policy Address 2020 pledge

- Invite the Hong Kong Housing Authority and the Hong Kong Housing Society to increase the plot ratio of future public housing projects so that **5% of the gross floor area can be set aside for the provision of social welfare facilities**

The URA, we were told, would ensure a better quality of living. With an ageing

society and serious deficits in the provision of many services, the almost nonexistent provision of community services in the development is deplorable and not acceptable.

Question the need for so much retail when Grand Waterfront nearby has a shopping mall of 14,000sq.m with 50 stores.

Question the need for so much parking when the Grand Waterfront with 1,782 units and a shopping mall has 268 parking spaces.

KC-19 is closer to the Sung Wong Toi MTR. Transport Dept continues to insist that it is government policy to encourage greater use of public transport. Apart from the MTR, this district has dozens of bus routes passing through and a bus station in front of the nearby ferry pier.

Question the omission of bicycle parking spaces when in due course there will be a bike track along the waterfront. Moreover in view of the distance to the tip of Kai Tak and the issues with transport, cycling should be encouraged.

Question the viability of the 10mt 2-storey retail belt and vibrant waterfront. No indication as to what measures would be in place to ensure that this becomes reality. None of our waterfront provide the variety of F&B outlets one enjoys in other jurisdictions. The reality will probably be on the lines of the SHK North Point development where what should be waterfront facilities are boarded up shop windows.

The description Waterfront Plaza is misleading. This is nothing more than a street with wall effect on either side leading to the waterfront. No indication that it will be pedestrianized.

No active recreational space provided, for example where young kids could learn to ride bicycles, etc.

And most important for this site, in view of the adjacent HKHS development, why is this site not developed for the same purpose. Apart from the many households to be dispersed re KC-018, there are also plans to redevelop the 13-Street complex. This will involve the dislocation of thousands of households. KC-019 should be developed under HKHS in order to provide an option for those residents to acquire a home and remain in the district where many of them have lived all their lives. It is absolutely shocking that local families are being displaced in order for the URA and its developer buddies to build investment vehicles for outsiders. Quite a number of Lee Tung Street units tick this box.

So another URA gentrification and another step in its ambitions to add to its portfolio of shopping malls as the intention appears to be to retain the commercial podium instead of flogging the shops to provide more capital for redevelopment projects.

Mary Mulvihill



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「九龍城交通」就市區重建局 KC-019 項目發展計劃草圖海濱規劃提出申述
03/05/2023 23:22

From: Kowloon City Transport <[REDACTED]>
To: tpbpd@pland.gov.hk
File Ref:

3 attachments



KC019 Form.pdf KC-019 Representation.pdf 202210 Letter to HC .pdf

城市規劃委員會秘書：

「九龍城交通」就市區重建局 KC-019 項目發展計劃草圖海濱規劃提出申述

我們一直關注九龍城區的海濱規劃，現就市區重建局 KC-019 項目發展計劃草圖提出申述，詳情請參閱電郵附件。

九龍城交通
(黃弘曆 代行)

**REPRESENTATION IN RESPECT OF
DRAFT PLAN UNDER SECTION 6(1) OF
THE TOWN PLANNING ORDINANCE (CAP. 131)**

根據《城市規劃條例》（第131章）
第6(1)條就草圖作出申述

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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.info.gov.hk/tpb/>）。
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九龍城交通	
(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)	
2. Authorised Agent (if applicable) 獲授權代理人 (如適用)	
Full Name 姓名 / 名稱 (Mr./Ms./Company/Organisation* 先生/女士/公司/機構*)	
黃弘曆	
(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)	
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Draft plan to which the representation relates (please specify the name and number of the draft plan) 與申述相關的草圖（請註明草圖名稱及編號）	S/K22/URA2/1

* 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」

3. Details of the Representation (Continued) (use separate sheet if necessary)[#] 申述詳情
 (續) (如有需要, 請另頁說明)[#]
Nature of and reasons for the representation 申述的性質及理由

Subject matters 有關事項 [@]	Are you supporting or opposing the subject matter? 你支持還是反對有關事項?	Reasons 理由
海濱規劃	<input type="checkbox"/> support 支持 <input type="checkbox"/> oppose 反對	請參閱附件。
	<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 draft plan? If yes, please specify the details. 對草圖是否有任何擬議修訂?
 如有的話, 請註明詳情。

請參閱附件。

[#] If supporting documents (e.g. colour and/or large size plans, planning studies and technical assessments) is included in the representations, 90 copies (or 40 hard copies and 50 soft copies) of such information shall be provided.

若申述附有支持其論點的補充資料(例如彩色及/或大尺寸的圖則、規劃研究及技術評估), 則須提供 90 份複本(或 40 份印文本和 50 份電子複本)。

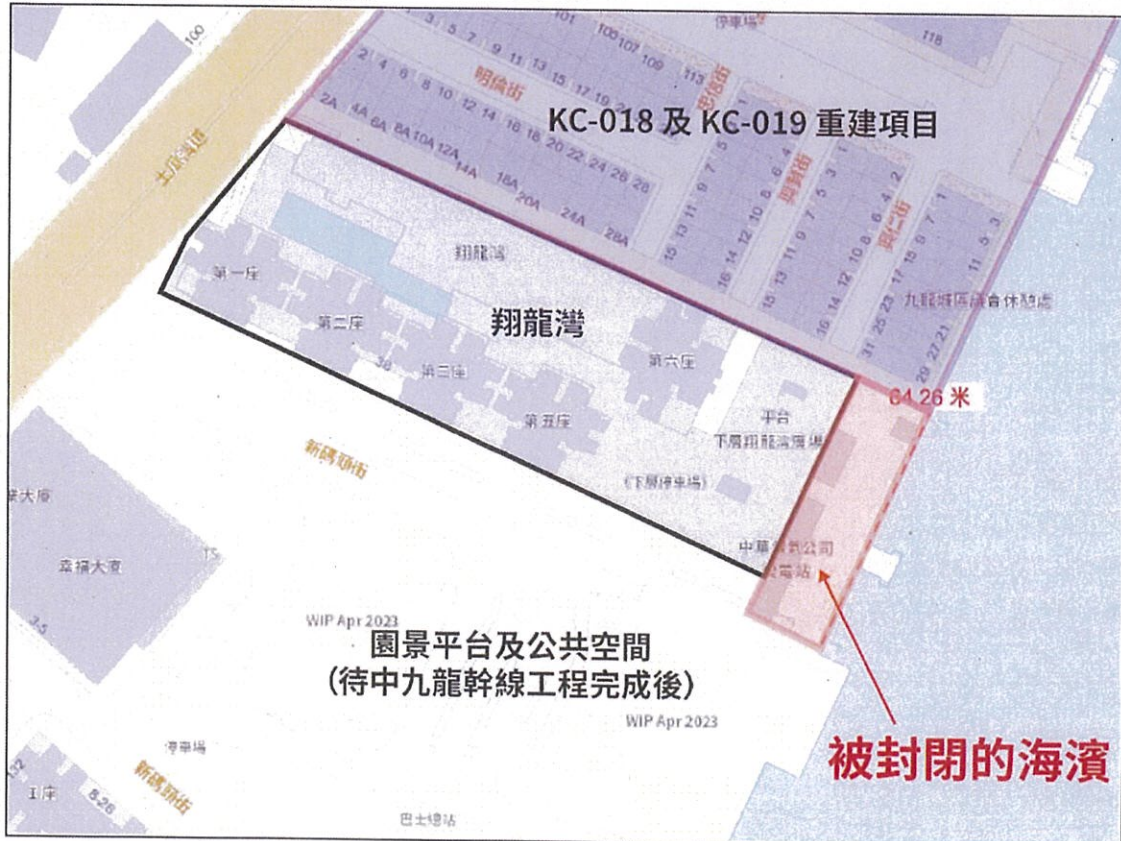
KC-018 及 KC-019 重建項目發展計劃草圖申述 貫通海濱 市民所盼 從速行動 勿失良機

我們一直關注九龍城區交通規劃及行人環境，因此不反對市建局透過推行 KC-018 及 KC-019 兩個重建項目進一步實現貫通九龍維港海濱的規劃願景。然而，從更宏觀角度而言，我們認為 KC-018 及 KC-019 未盡善用「規劃主導、地區為本」市區更新模式達成貫通整段土瓜灣至啟德海濱，回應立法會、城規會以至市民的期望。

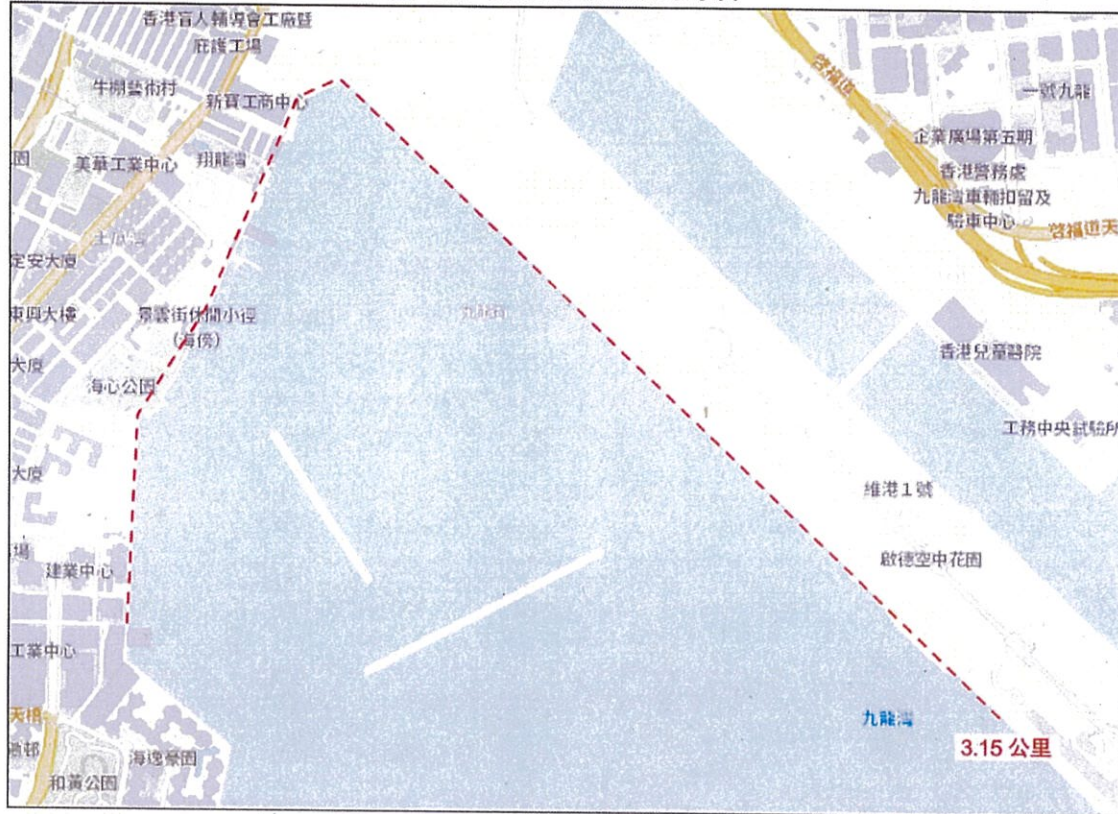
連同紅磡繞道一段高架行人道在內，整段九龍海濱由尖沙咀碼頭一直延伸到紅磡海逸豪園，並因為維港中心及富德中心私人發展而中斷。隨著政府著手擴建海心公園及開放富德中心旁土瓜灣基本污水處理廠外的海濱，土瓜灣海濱將重新貫通至九龍城碼頭。同時，KC-018 及 KC-019 重建項目將會連接其北面啟德發展區的海濱長廊。我們特別關注的是位處 KC-018 重建項目及九龍城碼頭之間在翔龍灣外一段被封閉的海濱，亦是貫通整段土瓜灣至啟德海濱的最後一塊拼圖。

如圖一所示，這段被封閉的「翔龍灣海濱」只長約 65 米，其南面現時是中九龍幹線工程地盤。根據規劃，中九龍幹線工程地盤在完成工程後將會成為一個園景平台及公共空間予公眾享用，與 KC-018 及 KC-019 重建項目建議的海濱空間互相呼應。貫通這段被封閉的「翔龍灣海濱」不但能加強兩處空間的连接性，更能將土瓜灣及啟德海濱連接成如圖二所見一段由土瓜灣基本污水處理廠到啟德郵輪碼頭之間一段長 3 公里的海濱，有重大的規劃裨益。

圖一：被封閉的「翔龍灣海濱」



圖二：可由土瓜灣基本污水廠理廠延伸至啟德郵輪碼頭的海濱



立法會及城規會一直關注海濱連貫性 惟未見政府與各方積極爭取解決方案

不論立法會及城規會多年來一直都關注土瓜灣 / 啟德以至整段九龍海濱的連貫性，就此我們會概述兩者近年特別就著這段海濱所提出的關注：

立法會

發展局在 2023 年 2 月 28 日出席了立法會發展事務委員會會議討論有關的「建設更暢達的海濱」之議程項目。李慧琼議員在書面提問中表達關注如下：

「針對目前翔龍灣變電站佔用了沿岸範圍，當局是否會考慮地區建議，與持份者磋商將變電站的邊界向後退或者搬遷，以騰出海濱用地」

「誠盼當局就上述關注事宜作出回覆，盡早建設一條連接啟德、土瓜灣、紅磡、尖沙咀、西九文化區海濱長廊的九龍新海濱」

就此，發展局海港事務專員答覆如下：

「就翔龍灣對開的臨海煤氣設施用地（該設施並非信中提及的變電站），據我們近月向香港中華煤氣有限公司（煤氣公司）了解，該煤氣站屬其位於馬頭角道和土瓜灣道旁的煤氣廠房的一部分，現時仍然在運作中。當中的煤氣調壓站乃用作供應煤氣予中九龍及東九龍的設施。另外，生產煤氣的原料石腦油需要透過該地段的碼頭運送至馬頭角生產廠房。基於該用地有其調壓作業功能，並需要為生產煤氣提供運輸，可以騰空海濱地方設置行人通道的可行性有限。儘管如此，我們會繼續與煤氣公司探討其他可能性。」

城規會

根據城規會在 2023 年 2 月 10 日考慮 KC-018 及 KC-019 重建項目的發展計劃草圖時的會議紀錄，會有城規會委員關注重建項目與周邊海濱之間的連接：

“the connection between the subject waterfront promenade at the Sites and other waterfront promenades in the area, and how far the waterfront promenade could be extended to.”

在會上，九龍規劃專員回應如下：

“The waterfront promenade could be further extended southwards to Hoi Sham Park, Hung Hom, Tsim Sha Tsui and West Kowloon. Although there was no waterfront promenade at the Grand Waterfront site, it was the Government’s vision to connect different parts of the waterfront areas as far as practicable and open the waterfront areas for public use.”

上述紀錄證明立法會及城規會一直關注土瓜灣 / 啟德以至整段九龍海濱連貫性，但不論是海港事務專員抑或九龍規劃專員的回應皆未就貫通「翔龍灣海濱」提出任何方向性解決方案以及貫通時間表。縱使如此，海濱事務專員的回覆亦帶來一些啟示：

- 未能開放「翔龍灣海濱」的主因是「技術層面」
- 「翔龍灣海濱」內有煤氣調壓設施
- 「翔龍灣海濱」的碼頭現用於運送石腦油至馬頭角生產廠房

技術原因未必不可逾越，資料未足證無法開放海濱予公眾享用

就此，我們認為海濱事務專員以至煤氣公司的回應皆未能充分引證「技術原因」乃未能開放「翔龍灣海濱」的主因。原因如下：

第一，煤氣公司提供的資料不足以證明「翔龍灣海濱」不適宜開放予公眾使用。煤氣公司未有提供「翔龍灣海濱」內現有設施平面圖以及各項設施的佔地及安全要求，難以充分說服公眾「可以騰空海濱地方設置行人通道的可行性有限」。同時，就著石腦油運送方面，煤氣公司亦未有公開運送安排，包括以每年 / 月 / 周 / 日計的運送次數、運送時段及公眾風險等。更重要的是，若然未能開放「翔龍灣海濱」是考慮到安全問題，何以隔鄰可以興建成住宅項目？我們認為政府以至各方不應在煤氣公司未有足夠資料的情況下就放棄貫通「翔龍灣海濱」以及所帶來的裨益，煤氣公司亦須提出更充分的理據，否則應積極尋求開放海濱的方案。

第二，煤氣調壓設施佔地小以及不會對行人構成風險。城規會曾在 2022 年 7 月 29 日批准一項規劃申請 (A/K9/279)，該申請擬議於紅磡紅菱街的行人路上闢設「地面煤氣調壓室」，佔地只有約 5.67 平方米，相當細小。根據當日的會議紀錄，規劃署高級城市規劃師 / 九龍曾於會上表示：

“the applicant, the Hong Kong and China Gas Company Limited, stated that the proposed kiosk needed to be located 3m away from any residential development and should not be covered by other structures in order to meet the safety requirements.”

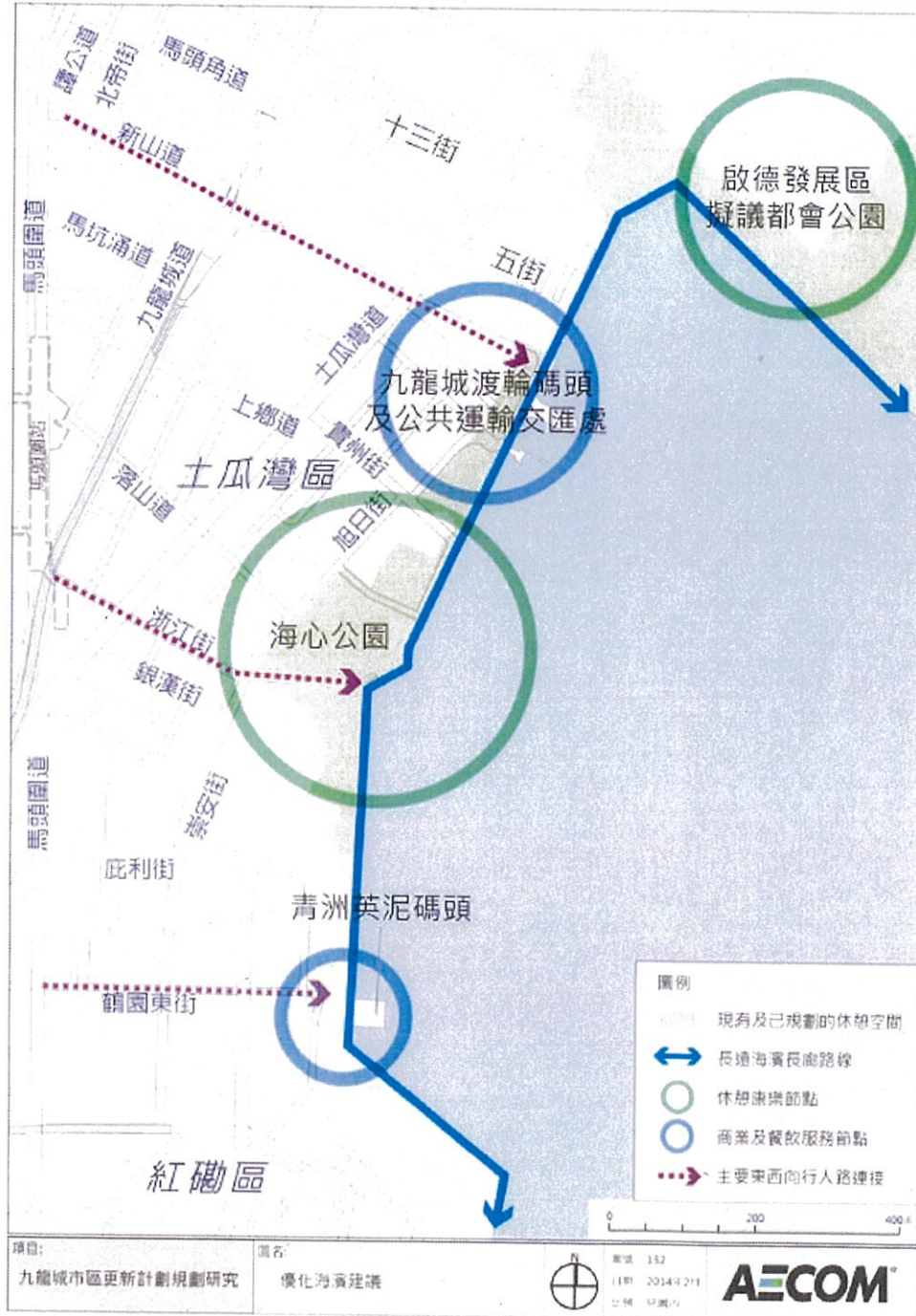
“There was sufficient buffer from the CLP Electric Substation that was located opposite to the proposed kiosk across Hung Ling Street and the pedestrian footbridge would not affect the operation of the proposed kiosk.”

因此，除非煤氣公司能提供足夠資料及評估，我們並不認同已設置煤氣調壓設施在技術上是未能開放「翔龍灣海濱」的理據。

市建局重建項目或未盡善用「規劃主導、地區為本」市區更新模式

政府及海濱事務委員會一直提倡建設一條連貫的維港海濱，而由九龍城市區更新諮詢平台發布的《九龍城市區更新計劃》(URP)亦希望「盡量打造一條暢通無阻及可連接其他區域海濱長廊」。KC-018 及 KC-019 重建項目在 URP 中位處「長遠海濱長廊路線」上(見圖三)。市建局表示，兩個重建項目將進一步向啟德發展區一帶連接至毗鄰房協地皮及啟德都會公園海濱，以「協助政府達致建造無間斷的世界級海濱長廊這項規劃目標」。

圖三：《九龍城市區更新計劃》－優化海濱建議



市建局強調進行 KC-018 及 KC-019 重建項目是依據「規劃主導、地區為本」的市區更新模式，而其中一項規劃願景是「以一體化規劃及設計，優化海濱及地區連繫，協助政府建造世界級海濱長廊。」KC-018 及 KC-019 重建項目的確將啟德都會公園及美食海灣一帶的海濱進一步向土瓜灣延伸。市建局利用「規劃主導、地區為本」市區更新模式，並不可能未有留意到「翔龍灣海濱」被封閉，令貫通長達 3 公里連貫海濱願景無法實現，亦有損達致「無間斷」海濱的規劃目標。

然而，我們並未見到市建局在 KC-018 及 KC-019 重建項目的規劃建議中對與煤氣公司就合作探討開放「翔龍灣海濱」提出任何行動或計劃。我們曾向市建局查詢會否參考觀塘汽車渡輪碼頭在不常用的設施中關設通道的模式，考慮以「活化」方式將「翔龍灣海濱」納入更新計劃，市建局回覆指：

「目前屬於中華煤氣的變電站設施以及私人土地範圍，不屬於市建局早前公佈的兩個重建項目範圍。有關設施和土地改作海濱走廊的可行性，需要由政府與設施及土地的擁有人磋商和協調」

各方消極面對「翔龍灣海濱」2047 年都難以貫通？

若如市建局所述，市民就只能靠政府與煤氣公司協調才能開放「翔龍灣海濱」才能享用連貫的海濱。同時，我們亦曾於 2022 年 10 月 17 日向海濱事務委員會秘書處提出查詢及意見（見 附錄一），然而至今仍未獲秘書處及海濱事務專員提供實質回覆。承上文所述，海港事務專員就立法會議員質詢的回應亦未就貫通「翔龍灣海濱」提出任何方向性解決方案以及時間表。若持續下去，市民又會否要等到 2047 年還未可以享用到由土瓜灣直達啟德的海濱？

「九龍城交通」的建議

我們認為，城規會應該同意 KC-018 及 KC-019 重建項目是全面貫通土瓜灣至啟德海濱的上佳機會。城規會亦應該正視現時政府、市建局、煤氣公司及各方須更積極爭取開放「翔龍灣海濱」，惠及全港市民。因此，我們建議城規會：

1. 在 KC-018 及 KC-019 發展計劃草圖的註釋或說明書內加入要求市建局與發展局和煤氣公司積極探討及推展開放「翔龍灣海濱」的方案，並需定期向發展局或規劃署匯報方案進度；及
2. 要求發展局及規劃署清晰交代未來在探討及推展開放「翔龍灣海濱」的實質行動及時間表。

另外，我們亦希望市建局及煤氣公司能就此申述以及貫通「翔龍灣海濱」事宜提出意見，善用未被「精簡」的《城市規劃條例》中容許各持份者透過申述及意見進行「對話」的空間，亦能令發展局、城規會、市建局及各持份者更充分思考如何真正落實貫通土瓜灣至啟德海濱以至整段九龍維港海濱的規劃願景。

附錄一：「九龍城交通」於 2022 年 10 月 17 日寄予海濱事務委員會秘書處的信件

九龍城交通
2023 年 5 月 3 日

Our ref: KCT/O16/202210-01

17 October 2022

By e-mail

Secretariat of the Harbourfront Commission
c/o Development Bureau

Harbourfront Development in the Kowloon City District

Dear Sir / Madam,

We are a concern group that envisioned a more sustainable and quality public transport system and walking environment for the Kowloon City ("KC") district. In this letter, we hope to put forward our concerns on the discontinuity of the harbourfront and urge the Harbourfront Commission to more proactively resolve the issue.

Discontinuity of the harbourfront

Victoria Harbour is a precious asset of Hong Kong. The general public, together with the Government and the Harbourfront Commission, "aspired to create an even more accessible, connected and enjoyable harbourfront for the people of Hong Kong" (referring to HC/01/2019). The KC District possesses almost 9 km of the valuable harbourfront between the active Tsim Sha Tsui to the west and the vibrant Kwun Tong Promenade to the east. Noted the strategic location of the KC District, there are abundant opportunities for harbourfront enhancement to be unleashed in the KC District for a more connected and enjoyable harbourfront as envisioned.

It was encouraging that by the concerted efforts of the Harbourfront Commission and various bureaux/ departments, the harbourfront between Hoi Sham Park and Kowloon City Pier has been connected and will be further extended to the south by the Extension of Hoi Sham Park and the newly proposed promenade adjacent to the To Kwa Wan Preliminary Treatment Works ("the TKWPTW") as proposed by the Drainage Services Department (DSD). However, the harbourfront between Laguna Verde and the TKWPTW (hereinafter "**Hok Yuen Harbourfront**") (**Figure 1** refers), which is only about 120m long, is still being closed by the owners of three private buildings including Hilder Centre on KML 113 S.B, Harbour Centre Tower 2 on KML 113 RP and Kowloon Permanent Pier No. 90 (KPP 90).

Besides, on 7 October 2022, the Urban Renewal Authority ("URA") also announced the redevelopment projects namely KC-018 and KC-019 which will further connect the harbourfront from the proposed Kai Tak Metro Park and the proposed Housing Society Site towards To Kwa Wan. Unfortunately, the harbourfront between the URA KC-018 redevelopment site and Kowloon City Ferry Pier (hereinafter "**Ma Tau Kok Harbourfront**") (**Figure 2** refers), which is only about 70m long, is still being blocked by the Hong Kong and China Gas Ma Tau Kok Substation ("the Substation") on land under the same grant as the Grand Waterfront numbered KML 102 RP.



We opined, the status quo of discontinuity of the harbourfront is highly undesirable that the general public cannot enjoy a continuous, diverse and quality 7-km long harbourfront extended from Tsim Sha Tsui to Kai Tak Cruise Terminal. In this letter, we hope to express to the Harbourfront Commission our views and potential solutions to contribute to a completely connected harbourfront as aspired by the general public.

Hok Yuen Harbourfront

The Hok Yuen Harbourfront is currently zoned as "Other Specified Uses (Annotated Business)" ("OU(B)") and "Undetermined" ("U") respectively on the Approved Hung Hom Outline Zoning Plan ("OZP") no. S/K9/28 (**Figure 3** refers). According to the Town Planning Board Minutes, the current zoning was delineated on or before 2007. According to the OZP Explanatory Statement, ***"it is a long term planning intention to incorporate the pier into a promenade development from Tsim Sha Tsui to Kai Tak"*** for the "U" zone covering KPP 90.

According to the Kowloon City Urban Renewal Plan ("KC URP") published in 2014 by the Kowloon City District Urban Renewal Forum ("KC DURF"), there was a general intention to ***"link up the waterfront areas currently blocked and to create an accessible and continuous waterfront promenade connecting different districts"*** while Harbour Centre Tower 2 and KPP 90 were proposed to be rezoned as "Comprehensive Development Area" ("CDA") that as of today, nil relevant rezoning proposal has been observed.

With reference to the meeting minutes and discussion paper of the Housing and Development Planning Committee under KC District Council meeting dated 23 June 2020, the Development Bureau ("DevB") and the Planning Department ("PlanD") expressed no intention to neither rezone nor resume the land of the Hok Yuen Harbourfront to complete the harbourfront between Tsim Sha Tsui and Kai Tak Development. It was the intention of DevB and PlanD to just wait for private redevelopment initiatives.

Unfortunately, the current planning, land and building context obviously failed to provide a favourable environment for private redevelopments. Although it is agreed that (partially) rezoning the Hok Yuen Harbourfront into "CDA" zone would further increase the hurdles for redevelopment, the current zoning of "OU(B)" and "U" failed to encourage private redevelopments. The development potential at the sites on the Hok Yuen Harbourfront is low which hinders private redevelopments. Moreover, Hilder Centre and Harbour Centre Tower 2 are still in relatively good condition. In overall, no private redevelopment can be anticipated in the medium term if the Government takes no further action, which heavily undermines the public and planning gains brought by a continuous harbourfront.

Besides, as revealed from the General Building Plans of Hilder Centre and Harbour Centre Tower 2, there are ground level setbacks from the coastline (**Figures 4-5** refer). However, according to our site inspection, there are some potentially illegal structures (subject to the investigation by the Buildings Department) at the setback area (**Figure 6** refers) which come to our attention the possibility to open up the setback area for public enjoyment.

If the Government still insists on connecting the harbourfront by the redevelopment approach, with full acknowledgement of the owners' right to use the setback area within the lot, the Government should actively explore interim options, for instance, land exchange, revitalisation of KPP 90 and other land / financial incentives. Rezoning proposals to release the development potential of KPP 90 and the OU(B) area should also be explored.

Ma Tau Kok Harbourfront

The Ma Tau Kok Harbourfront is currently zoned as "Residential (Group A)1" ("R(A)1") on the Draft Hung Hom OZP no. S/K22/7 (Figure 7 refers). According to the OZP Notes, **"On land designated "Waterfront Promenade" in the "Residential (Group A)1" zone, a 20m wide promenade abutting the waterfront shall be provided for public enjoyment purpose."** However, according to our site inspection, the Hong Kong and China Gas Ma Tau Kok Substation blocked the harbourfront (Figure 7 refers)

In the KC URP, the Ma Tau Kok Waterfront was planned on the **"Long-term Route for Waterfront Promenade"** while **"the suggested alternative route goes around the existing Grand Waterfront or via its shopping mall in order to link up the waterfront promenades near Kowloon City Ferry Pier and '5 streets'."**

It is acknowledged that there are challenges to directly connect the Ma Tau Kok Waterfront. First, to fully connect the Ma Tau Kok Waterfront, the Substation may need to be relocated which may lead to technical feasibility issues. Second, since the Substation is under the same land grant with the Grand Harbourfront, either resumption or land exchange or surrender and regrant of land may lead to complicated land-related matters.

The announcement of URA KC-018 and KC-019 projects and the construction of Central Kowloon Route ("CKR") provide a precious opportunity to further improve the connection of the Ma Tau Kok Waterfront. In recent years, the URA is keen to promote "revitalisation" initiatives aspired to improve the connectivity and walking environment in the KC District while under the CKR project, a landscaped deck will be provided over the existing Kowloon City Ferry Pier Bus Terminus to improve the harbourfront environment.

In fact, Kwun Tong Vehicular Ferry Pier ("KTVFP") serves as a precedent to connect the harbourfront despite the presence of public utilities. An at-grade public passageway is provided at KTVFP, which connects Kwun Tong Promenade and Kwun Tong Ferry Pier (Figure 8 refers). Both the Substation and KTVFP are still in operation but with very limited level of daily operation. In spite of the fact that KTVFP is on Government land but the Substation is on the private lot of KML 102 RP, we hope that the Harbourfront Commission, DevB, PlanD, URA and relevant departments are aware of such potential as an interim solution to connect the harbourfront.

Besides, according to the KC URP and Figure 3, an alternative route going around the existing Grand Waterfront was proposed. We consider that with the announcement of URA KC-018 and KC-019 redevelopment, URA should consider "revitalisation" incentive to conduct pavement widening and enhance the walking environment of the alternative route, especially when pedestrians usually encounter narrow pavement of not wider than 3m along To Kwan Wan Road outside the Grand Harbourfront (Figure 9 refers), and odour pollution on the pavement along San Ma Tau Street. However, according to the press release, and planning statement submitted to the Town Planning Board, URA has no explicit intention to improve the walking environment between the KC-018 redevelopment site and Kowloon City Ferry Pier / the future landscaped deck.

Our Grievances

In light of the above considerations, we urge the Harbourfront Commission to call on DevB, PlanD, URA and relevant departments to:

1. Report in detail the planning, land and building information at the Hok Yuen Harbourfront and the Ma Tau Kok Harbourfront;
2. Report in detail the previous liaison works with land owners conducted to strive for opening up the Hok Yuen Harbourfront since the rezoning of KPP 90 into "U" zone in 2007;
3. Commence a feasibility study to explore possible options to connect the Hok Yuen Harbourfront, including but not limited to land exchange, rezoning, revitalisation, public-private partnership and other land / financial incentives, and report such results and considerations to the Harbourfront Commission;
4. Commence a feasibility study to explore the potential to open a public passageway at the Substation adjacent to the Grand Waterfront, similar to the one at Kwun Tong Vehicular Ferry Pier through revitalisation initiative by URA or actions by DevB or other relevant parties, and report such results and considerations to the Harbourfront Commission;
5. Implement pavement widening and walking environment enhancement initiatives to improve the *"the suggested alternative route around the Grand Waterfront"* between URA KC-018 and KC-019 Redevelopment, Kowloon City Ferry Pier and the future Ma Tau Kok Landscape Deck; and
6. Make an all-out effort to completely connect the harbourfront from Tsim Sha Tsui to Kai Tak Cruise Terminal and to the further Kwun Tong Promenade as aspired by the general public.

For any issue, please contact us via this kowlooncacitytransport@gmail.com. We look forward to your reply and the Government's effort to construct a world-class and continuous harbourfront for Hong Kong. Thank you for your attention.

Yours faithfully,

Anthony YEUNG (Mr.)

*On behalf of
Kowloon City Transport*

cc
Ms. LINN Hon Ho, Bernadette, JP (Secretary for Development)
Ms. LEE Hoi Lun, Leonie (Comr for Harbourfront)

Figure 1 - Lot Plan of the Hok Yuen Harbourfront

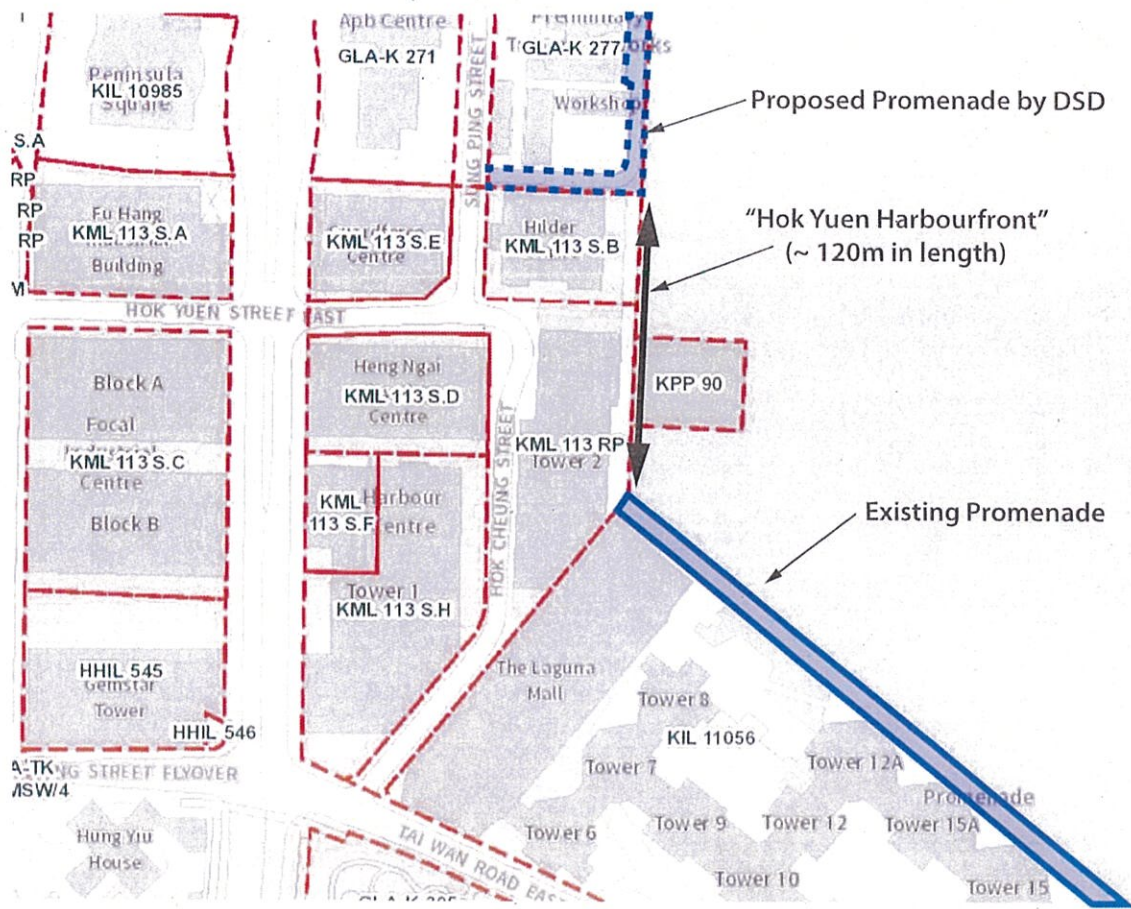


Figure 2 - Lot Plan of the Ma Tau Kok Harbourfront

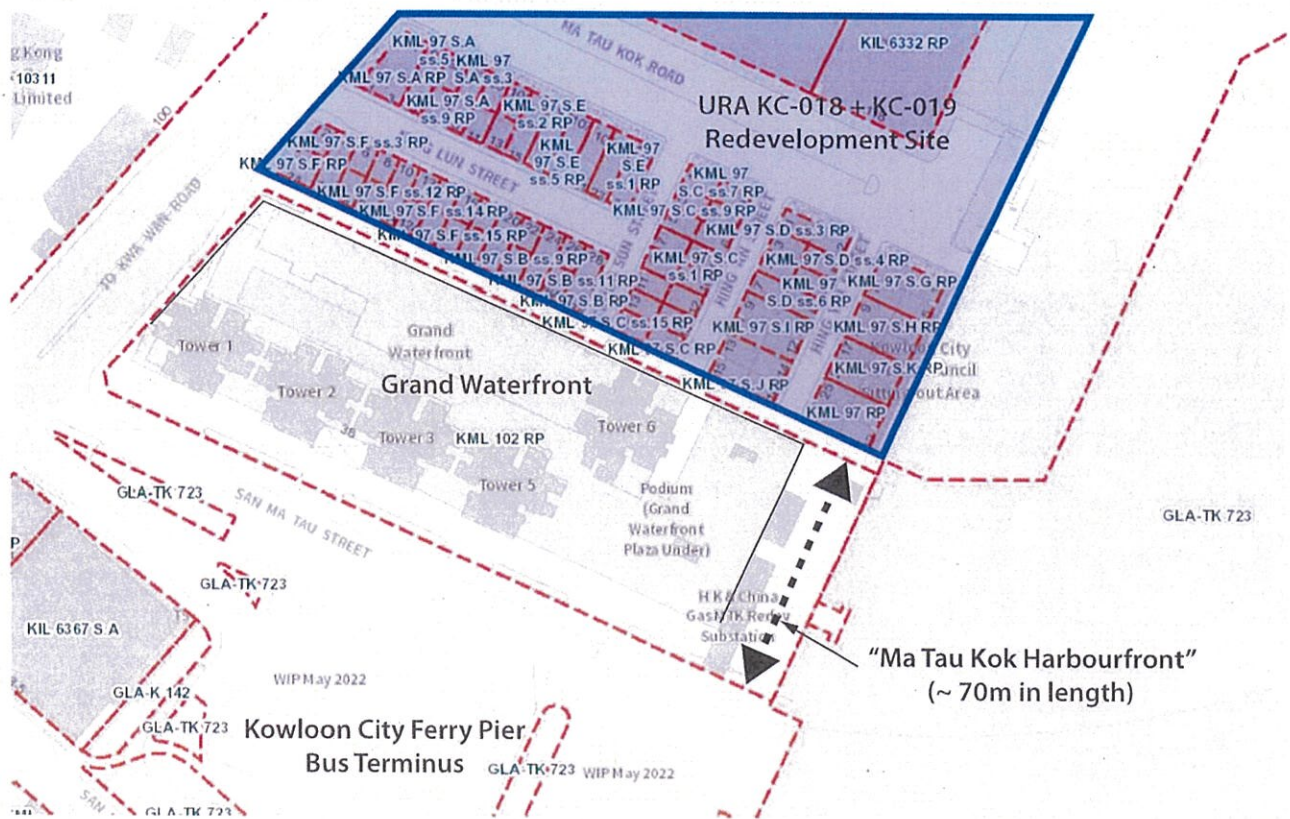


Figure 3 - Excerpt of Approved Hung Hom Outline Zoning Plan no. S/K9/28

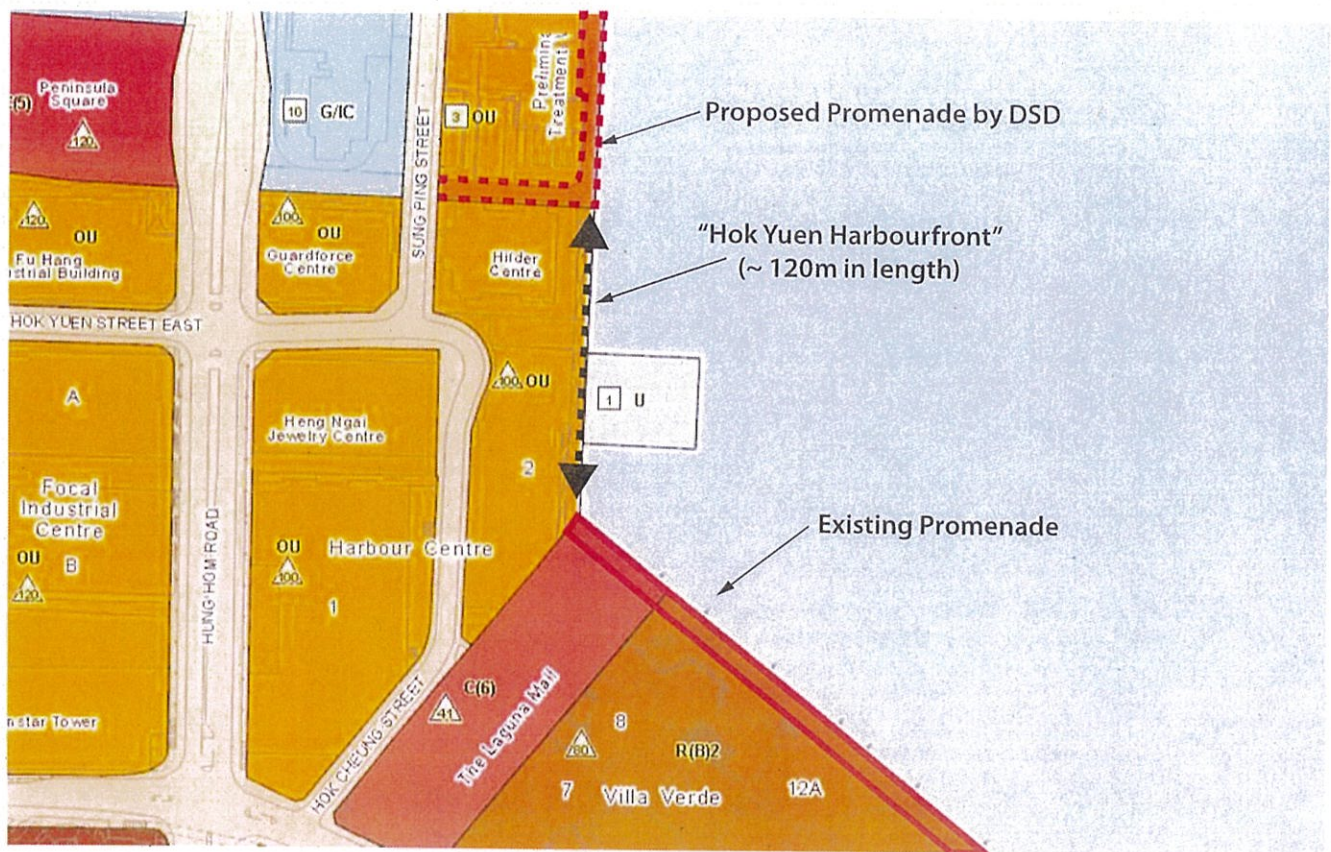


Figure 4 - Excerpt of Draft Kai Tak Outline Zoning Plan no. S/K22/7

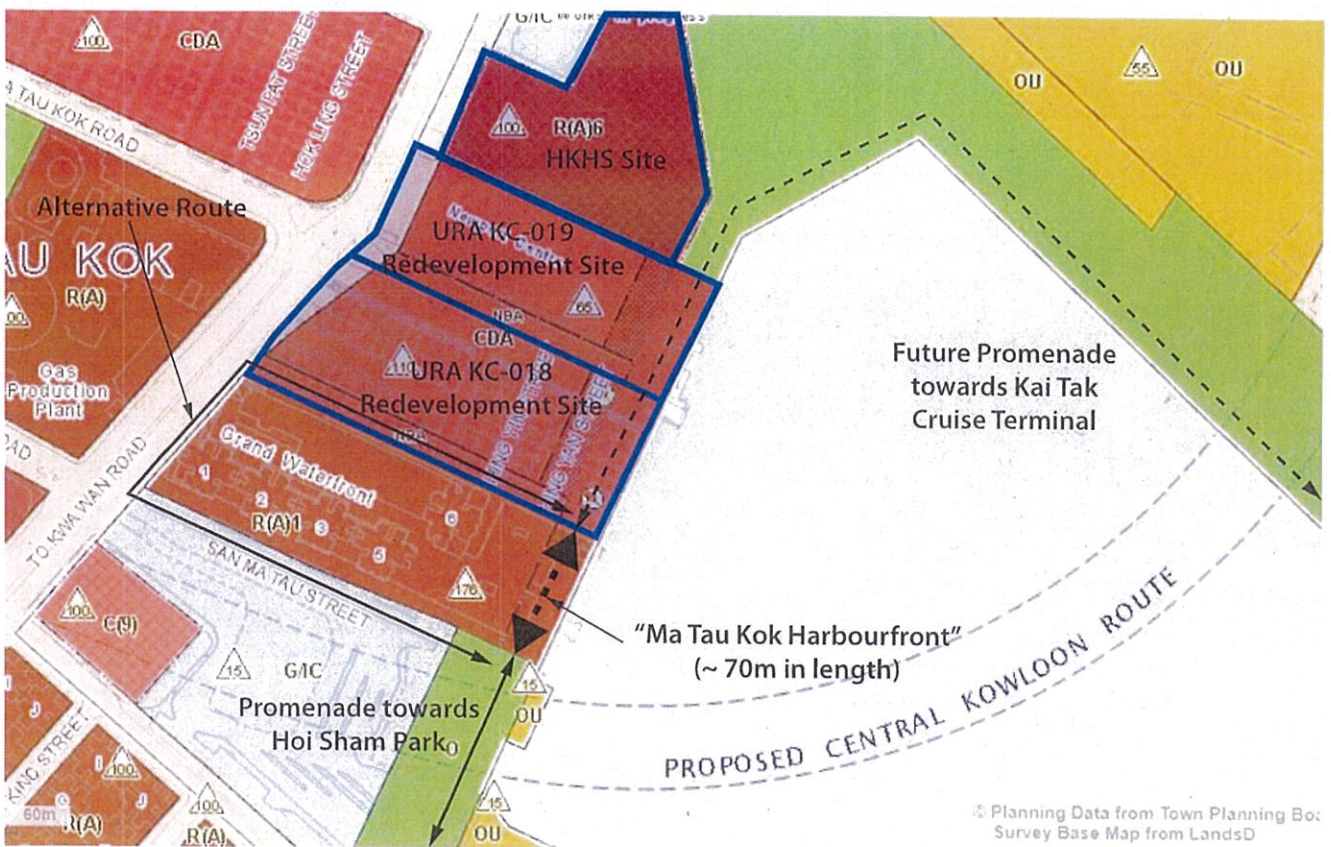


Figure 5 - Annotated G/F Plan of Hilder Centre

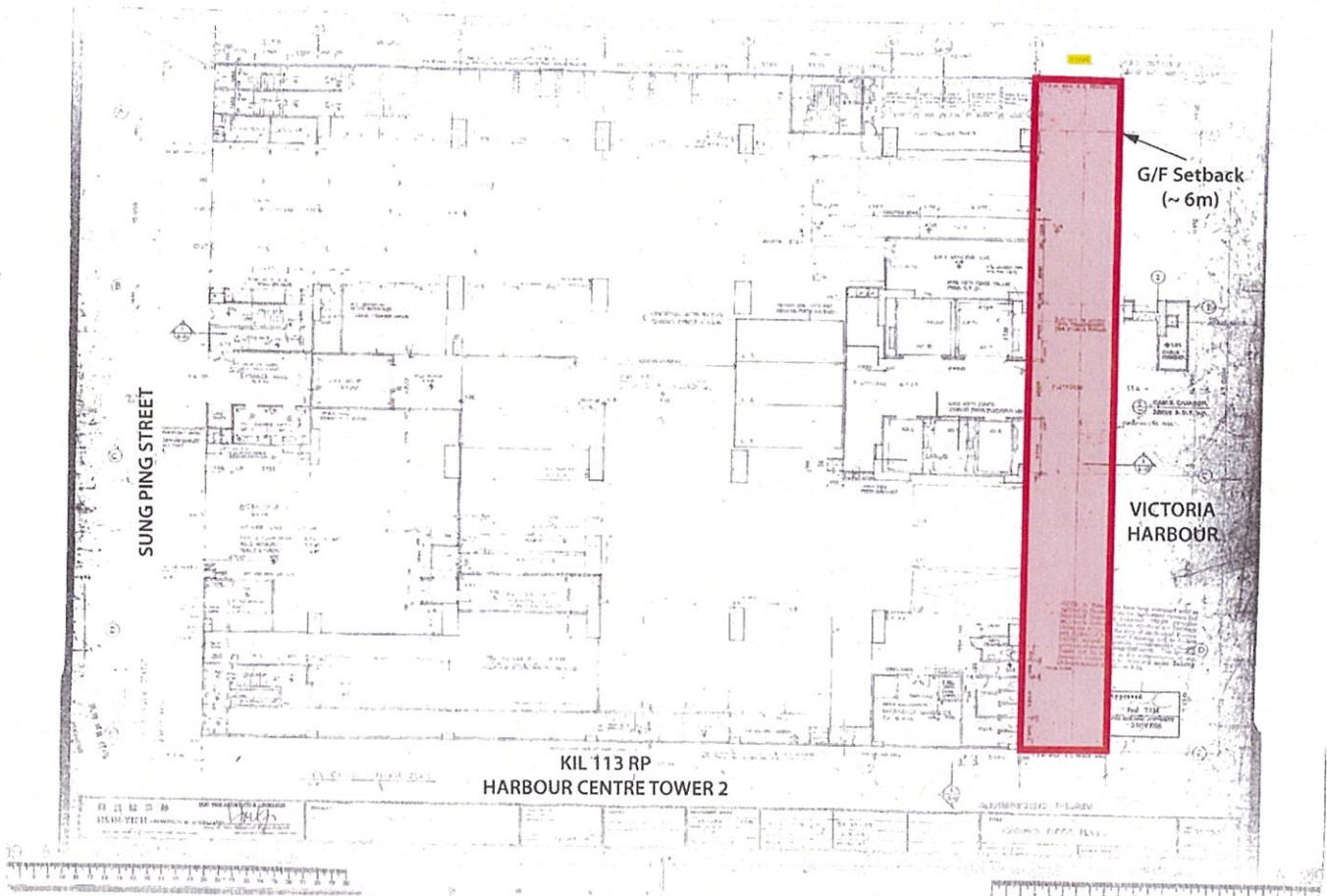
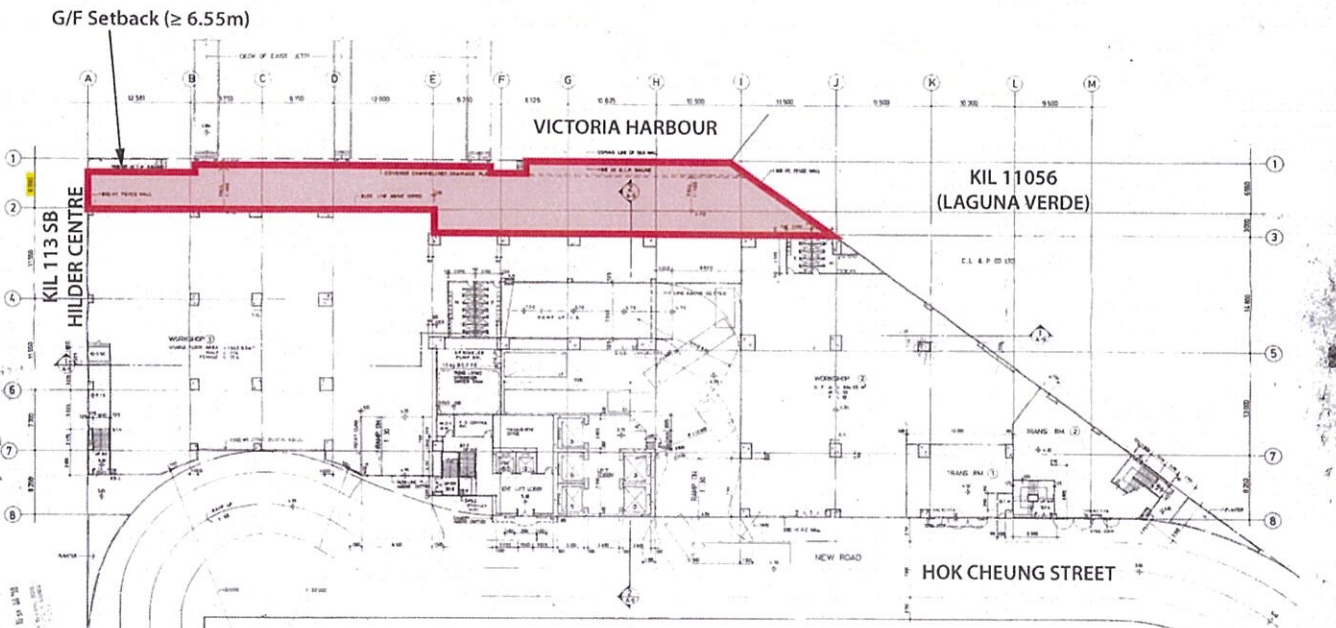


Figure 6 - Annotated G/F Plan of Harbour Centre Tower 2

B.L.D. REF. NO. 2/1022/18
P.S.D. REF. NO. 278 9/2023



1 G/F PLAN
TARRED LAY = 125428
PARKING SPACE (ON G/F)
UPPER = 1 NO.
LOWER = 1 NO.

RECORD PLAN
AMENDED PLAN

興業建築師 HSIN-YIEH ARCHITECTS & ASSOCIATES <small>100-100 WING LOK ROAD, HONG KONG</small>	PROJECT PROPOSED INDUSTRIAL BUILDING ON K.M.L. 113 SECTION R.P.	DRAWN BY:	CHECKED BY:	APPROVAL DATE:	SCALE:	TITLE:	NO:
		DATE:	DATE:	DATE:	DATE:	DATE:	DATE:

G/F PLAN
1:200
A-4

Figure 7 - Site Photo of Hok Yuen Harbourfront (taken in September 2022 from Laguna Verde)



Figure 8 - Site Photo of Ma Tau Kok Harbourfront (taken in October 2022 from URA KC-018 Redevelopment Site)



Figure 9 - Public Passageway at Kwun Tong Vehicular Ferry Pier



Figure 10 - Excerpt of GeoInfoMap covering the Grand Harbourfront

