



TPB/R/S/K2/25  
C1



Our Ref: URA231002241

By Fax and By Post  
(via fax no: 2877 0245)

6 October 2023

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

Dear Sir/Madam,

**Submission of Comments on Representation to the  
Draft Yau Ma Tei Outline Zoning Plan No. S/K2/25**

We refer to the captioned Draft Yau Ma Tei Outline Zoning Plan No. S/K2/25 (the Plan) in the Government Gazette G.N. 3810 published by the Town Planning Board (TPB) in respect of the captioned.

We have prepared comments on representation in respect of the Plan. In accordance with Section 6A(1) of the Town Planning Ordinance, the following documents are submitted for consideration by the TPB: -

- 1) Duly completed Form No. S6A
- 2) Appendix 1

Should you have any enquiry on the submission, please feel free to contact Ms Melody Mak at [REDACTED] Thank you.

Yours faithfully,

Lawrence Mak  
Director  
Planning & Design Division

encl.

c.c. (w/o -- by fax)

DPO/TWK, PlanD (Attn: Mr Derek T'se) [REDACTED]



Form No. S6A  
表格第 S6A 號

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

根據《城市規劃條例》(第131章)  
第6A(1)條就草圖的申述提出意見

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	Date Received 收到日期	

- The comment should be made to the Town Planning Board (the Board) before the expiry of the specified period for making comment on the representation. 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.  
意見必須於指定對市址提出意見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意見的文件(如有)，必須送交香港北角渣甸道333號北角政府合署15樓城市規劃委員會秘書處。
- 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 (Headline: 2231 5000) (1/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/eng/>  
填寫此表格之前，請先細閱有關「擬議城市規劃條例草案及公佈申請」對申述的意見及進一步申述；的城市規劃委員會刊物。這份指引可向委員會秘書處(位於北角渣甸道333號北角政府合署15樓 - 電話：2231 4810或2231 4835及規劃處的規劃資料查詢處(熱線：2231 5000) (香港北角渣甸道333號北角政府合署17樓及新界沙田上禾輦路14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/eng/>)。
- 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 comment may be treated as not having been made if the required information is not provided.  
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**1. Person Making this Comment (known as "Commenter" hereafter)**  
**提出此宗意見的人士 (下稱「提意見人」)**

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

Urban Renewal Authority

(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\*)

N/A

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**3. Details of the Comment 意見詳情**

Draft plan to which the comment relates (please specify the name and number of the draft plan) 與意見相關的草圖 (請註明草圖名稱及編號)	Draft Yau Ma Tei Outline Zoning Plan No. S/K2/25
Representation(s) to which the comment relates (please specify the representation number) 與意見相關的申述(請註明申述編號)	Representation No. 1

\* Delete as appropriate 請刪去不適用者  
Please fill in "N/A" for not applicable item 請在不適用的項目填寫「不適用」

Form No. S6A 表格 S6A

3. Details of the Comment (Continued)(use separate sheet if necessary)<sup>#</sup>  
意見詳情(續)(如有需要,請另頁說明)<sup>#</sup>

Detailed comments on the representation(s) mentioned above 對上述所提及的申請的意見詳情

Please refer to Appendix I as attached.

<sup>#</sup> If supporting documents (e.g. colour and/or large size plans, planning studies and technical assessments) is included in the comment, 90 copies (or 40 hard copies and 50 soft copies) of such information shall be provided.  
若意見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 份硬本和 50 份電子複本)。

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

Comments on Representation No. 1 in respect of the  
Draft Yau Ma Tei Outline Zoning Plan No. S/R2/25

## Appendix I

Representation No.	Extracted Reasons	URA's Responses/Comments
<p data-bbox="151 371 352 398">TPB/R/S/K2/25-1</p> <p data-bbox="151 434 400 495">Oppose to Amendment Items A, B &amp; C</p> <p data-bbox="151 530 363 622">Oppose to the Amendments to the Plan</p>	<ul style="list-style-type: none"> <li data-bbox="427 371 911 629">• The proposed increase in plot ratio and building height restriction for the "C" zone on the two sides of Nathan Road and the "R(A)" zone will create additional building bulk, and thus greater wall effect with adverse impacts on the air quality at street level and a loss of sunlight and sky views of the sky.</li> <li data-bbox="427 665 911 891">• The proposed rezoning of various sites along the character streets from "R(A)" to "OU(MU)" with stipulation of BIIR of 115mPD will increase the podium bulk of the developments and would certainly impact both air ventilation and penetration of natural light.</li> </ul>	<ul style="list-style-type: none"> <li data-bbox="938 371 1423 987">• The proposed amendments to the "C" sites along Nathan Road are part of a package of proposals stemmed from the YMDS which aims to "regenerate Yau Mong into a livable, sustainable, diverse and vibrant metropolitan hub while reinforcing it as an area representing the rich local and cultural heritage of Hong Kong". To strengthen Nathan Road as a key shopping street / commercial spine, and to incentivize redevelopment which has unfortunately remained relatively stagnant since the lowering of PR from 15 to 12 as recommended in the Kowloon Density Study, the PR for "Commercial" sites along the Road is proposed to be increased from 12 to 15 (i.e. up to B(P)R limit) with a corresponding increase in building height.</li> <li data-bbox="938 1023 1423 1249">• The proposed amendments to the "R(A)" zone aim to allow more flexibility for interchangeability between domestic and non-domestic PR so long as the overall PR is kept within the OZP permissible limit to increase flexibility and to cater for market change.</li> <li data-bbox="938 1285 1423 1576">• The existing Temple Street is one of the key attributes to the unique identity of Yau Mong. To sustain the future growth and evolution of character streets, various sites along Temple Street and Woosung Street are proposed to be rezoned from "R(A)" to "OU(MU)" to encourage flexibility for commercial uses and vibrancy through future redevelopment.</li> <li data-bbox="938 1612 1423 1881">• In fact, whether the proposed increase in plot ratio and building height restrictions will bring about wall effect and other adverse impacts would very much depend on the building design. The various measures under the SBD Guidelines contribute to minimizing the wall effect and facilitating visual permeability.</li> </ul>

Comments on Representation No. 1 in respect of the  
Draft Yau Mong Tai Office Zoning Plan No. S/K2/25

- |  |   |  |
|--|---|--|
|  | <ul style="list-style-type: none"> <li>• The existing/planned open space provision and some GIC facilities (e.g. Residential Care Homes for the Elderly) are in deficit.</li> </ul> | <ul style="list-style-type: none"> <li>• The proposed amendment items under the representation have been thoroughly assessed (attached to MPC Paper No. 5/23) to ensure that it is technically feasible under environmental, traffic, infrastructural, visual and air ventilation aspects without insurmountable problems. In particular, the air ventilation and visual impact arising from the increase in building height have been assessed in the air ventilation assessment (AVA) and visual impact assessment (VIA) attached to the MPC Paper No.5/23. The AVA and VIA have compared the proposed height increase with the O/P restrictions and concluded that the proposed amendments would not result in adverse air ventilation and visual impact. Conversely, the proposed height increase would allow more design flexibility and more open space at ground floor level.</li> <li>• The proposed amendments would not bring out an adverse impact on the district, but rather, would strengthen Yau Mong district's position as a metropolitan hub of Hong Kong and would provide necessary incentives to encourage market participation in urban renewal in the district.</li> <li>• The YMDS has recommended 48ha of open space to serve a total of 213,000 persons under the MRCP+ scenario. Such provision is based on a distinctive open space network well connected to and integrated with the proposed development nodes and other key amenity features, like the West Kowloon Terminus Landscape Deck.</li> <li>• In addition, the YMDS has proposed a comprehensive GIC strategy whereby GIC provision has been reviewed based on HKPSG and Government departments' wish lists. Apart from the rationalization of GIC facilities through integration, consolidation and relocation, premises-based GIC facilities are incorporated into the designated redevelopment sites, and</li> </ul> |
|--|---|--|

Comments on Representation No. 1 in respect of the  
Draft Yau Ma Tei Outline Zoning Plan No. S/23/25

		<p>new G/IC complexes and sites are proposed at strategic locations. Should all the recommendations of the YMDS be incorporated, there will be no deficit in GIC facilities in the district. In any event, the departments concerned will be consulted again at the implementation stage of the redevelopment project undertaken by URA to provide the needed GIC facilities in the project to meet district needs.</p>
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Urban Renewal Authority

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與意見相關的草圖（請註明草圖名稱及編號）

Draft Yau Ma Tei Outline Zoning Plan No. S/K2/25

Representation(s) to which the comment relates (please specify the representation number)  
與意見相關的申述（請註明申述編號）

Representation No. 1

\* Delete as appropriate 請刪去不適用者

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Representation No.	Extracted Reasons	URA's Responses/Comments
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**YAU MA TEI OZP S/K2/25**

06/10/2023 21:26

**TPB/R/S/K2/25  
C2**

From:

To:

[REDACTED]  
tpbpd <tpbpd@pland.gov.hk>

## **YAU MA TEI OZP S/K2/25**

Dear TPB Members,

It is a sad reflection on the state of our society and the determined efforts of the administration to discourage ordinary citizens from engaging in consultations on issues that will impact their daily lives that nobody else has taken part in this fake consultation.

REDA has not bothered participating because it knows that PlanD will recommend and TPB members after squaking a bit will dutifully endorse the plan.

The proposed increases in both height and PR indicate that the town planning system is still geared to the 'good old days' when developers could throw a few bricks on a site and make a lot of money.

Covid brought about a dramatic change in the work/life pattern that is not reflected in the OZP. Messages from the market that demand for office space is on a steep decline are being ignored.

The geography of our urban centres, very narrow streets and blocked skylines, indicate that further increase in density and height are the opposite to what Hong Kong should be envisaging if it wants to attract and retain talent and make the city a more family friendly metropolis..

From my living room window I can see new towers in TST gradually filling up my sky, and that is with a BHR of 110mPD. New buildings like that on Humphreys Avenue where you have to strain your neck to see the sky are a good example of what the future holds. The outcome will be an urban centre of hot, dark canyons. Anybody living or working below the 30<sup>th</sup> floor will never see the sky.

URA is interested only in maximizing revenue. TPB members however have a duty to ensure that the plans they approve deliver the best results for the community. The already generous BHR and PR will, as buildings are being redeveloped, have a negative impact re increased wall effect.

No further concessions should be approved.

Mary Mulvihill

