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	AMENDMENTS TO YAU 30/08/2023 21:40	I MA TEI OUTLINE	ZONING PLAN NO. S/I	K2/24
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AMENDMENTS TO YAU MA TEI OUTLINE ZONING PLAN NO. S/K2/24

Item A – Revision of the BHR for the "Commercial" ("C") zones on the two sides of Nathan Road from 110Mpd to 140mPD (2022 -100mPD to 110Mpd – 10%)

Increase PR from 12 to 15 Cumulative 40% increase in height and 25% in bulk OBJECT

Item B – Rezoning of various sites in the area bounded by Kansu Street, Shanghai Street, Jordan Road, Parkes Street and Woosung Street from "Res (Group A)" ("R (A)") to "Other Specified Uses" annotated "Mixed Use" ("OU(MU)") with stipulation of BHR of 115mPD. (2022 - 80mPD to 100mPD - 25%) Increase PR from 7.5 to 9. Cumulative 43% increase in height and 20%in bulk OBJECT

Item C – Revision of the BHR for the "Res (Group A)" ("R(A)") zones from 100mPD to 115mPD. (2022 - 80mPD to 100mPD - 25%) Increase PR from 7.5 to 8.5

Cumulative 43% in height and 13% in bulk OBJECT

Dear TPB Members,

So another year and another significant increase in building heights and density in a district where most of the streets are extremely narrow, two lanes at most, and even with the original building heights of average 13 stories are already dark and poorly ventilated.

The increases in height and bulk should be considered in relation to their existing dimensions, not those of the 2022 OZP. The "C" zones would effectively be three times higher and the residential 2.5.

The 2022 rezoning was to comply with the **Court's ruling on a JR application** on the draft OZP No. S/K2/21, a review of the building height restrictions taking into account the implications of Sustainable Building Design Guidelines (SBDG) and permissible development intensity was **conducted in 2018**. To provide flexibility for **future development to comply with SBDG**, a BHR of 100mPD and 110mPD are stipulated for the R(A)") and "C" zones except for the "R(A)1" zone.

The current application increases both height and PR so more wall effect. As all the buildings will be built on large podiums there will be no improvement to air quality at street level. The 2022 application stated:

However, relying on SBDG alone would not be sufficient to ensure good ventilation, and other air ventilation measures, such as NBA and setback requirements at different locations across the Area could increase urban permeability for air movements within the existing street canyons and facilitate wind flow into the Area and are considered essential and should be maintained

This application proposes no additional measures to those of the approved 2022 OZP. So more height, more bulk, but nothing to counteract the negative impacts.

Nathan Road is a main thoroughfare, it is unacceptable that the existing wall effect be further increased. Pedestrians want to see the sky and enjoy natural penetration of sunlight to the pavement.

As with the 2022 application there are conflicting statements like:

"The building height restrictions (BHRs) are also proposed to relax accordingly to accommodate the increase in PR and allow further design flexibility while respecting the local characteristics and preservation of ridgeline of Lion Rock viewed from the strategic viewing points'

But: "The proposed amendments, together with other existing residential developments, would form a taller urban backdrop complementing the WKCD identity upon full redevelopment, with some portions exceeding the "20% Building Free Zone below ridgeline" as recommended in the Urban Design Guidelines under HKPSG the proposed amendments may reduce visual openness, permeability and access to sky view"

Ventilation – "The podium bulk of developments in "OU(MU)" zone may be increased due to increase in flexibility of non-domestic uses within developments"

But other sections of the paper say there will be no negative impact. A higher podium would certainly impact both ventilation and penetration of natural light.

Then we have the GEM.

"Variations in lot size and development scale as well as differences in design styles and considerations would contribute to varieties in BH and outlook over the area"

Could we have one example where developers did not build to the maximum BHR/PR? Again we have the monotonous blocks all of similar height and design.

GIC and OS issues air brushed despite some nodes not having even a small sitting out area and the alarming deficit in GIC. There are no RCHE in the district where families could accommodate their elderly relatives within easy distance of their homes, this in an ageing society where carers are often themselves elderly.

The amendments might be acceptable in a district like TKO with very wide streets, but even Nathan Road could not be called a boulevard.

The decreasing demand for commercial property and the growing glut in unsold residential units indicated that there is no justification to approve measures that would deprive both residents at lower levels and pedestrians of a view of the sky and natural light. There is no longer need for all that additional GFA, and with the development of the Northern Metropolis, if it is properly executed, people living in NT will no longer flock to HKI and Kowloon for employment and recreational purposes.

Members should reject this plan.

Mary Mulvihill