

**CONSIDERATION OF REPRESENTATIONS NO.
R1 TO R3 (PART), R10 (PART) AND R8460
AND COMMENTS NO. C40 TO C49, C50 TO C60 (PART), C62(PART) and C63 (PART)
IN RESPECT OF THE DRAFT NGAU TAU KOK AND
KOWLOON BAY OUTLINE ZONING PLAN NO. S/K13/29
(Group 2)**

| Subject of Representations | Representers | Commenters |
|---|--|---|
| <u>Amendment Item C</u> Stipulation of building height restriction on a “Residential (Group A)” (“R(A)”) site near the junction of Kwun Tong Road and Choi Shek Lane (i.e. the site was previously occupied by Kai Tak Mansion (KTM) which is under demolition) | <u>Total: 5</u> <u>Support (3)</u> R1 to R3 (part) ¹ : Individuals <u>Oppose (2)</u> R10 (part) ¹ : Individual R8460 : Oriental Generation Limited (OGL), owner of KTM site | <u>Total: 23</u> <u>Support R8460</u> C40 : OGL <u>Express views on KTM site</u> C41 to C49 : Kwun Tong District Council members Mr Cheung Shun-wah (C41), Mr Chan Chun-kit (C43) and individuals <u>Express general views</u> C50 to C60 (part) ¹ : Individuals <u>Oppose the Plan</u> C62 (part) and C63(part) ¹ : Individuals |

1. **Introduction**

- 1.1 On 13.4.2017, the draft Ngau Tau Kok and Kowloon Bay Outline Zoning Plan (OZP) No. S/K13/29 (the Plan) (**Annex I**) was exhibited for public inspection under section 7 of the Town Planning Ordinance (the Ordinance). The amendments are set out in the Schedule of Amendments at **Annex II**. During the two-month exhibition period, a total of 8,459 representations² were received. On 4.8.2017, the Town Planning Board (the Board) published the representations for three weeks for public comments and 63 comments were received. Subsequently, two representers (**R1362 and R1686**) wrote to the Secretary of the Board stating that they had not submitted any representation.

¹ **R1 to R3, R10 and C62** are also in respect of Items A, and/or B, D1, D2. **C50 to C60 and C63** are general in nature. The concerned part of them will be covered in the TPB paper No. 10355 for Group 1.

² During the exhibition period, a total of 8,460 representations were received, but **R1289** was subsequently withdrawn.

- 1.2 The amendments mainly involve rezoning of two sites at Wang Chiu Road from “Open Space” (“O”) to “R(A)” (Amendment Item (Item) A) and a site between these two sites from “O” to “Government, Institution or Community” (“G/IC”) (Item B); stipulation of building height (BH) restriction (BHR) for a “R(A)” site covering the KTM at Kwun Tong Road (Item C); rezoning of various sites to reflect their as-built condition (Items D1 and D2); as well as amendments to the Notes of the Plan.
- 1.3 On 6.10.2017, the Board agreed to consider the representations and comments itself in two groups as follows:
- (a) Group 1: collective hearing of 8,456 representations (**R1 to R8459**) and 53 related comments (**C1 to C39** and **C50 to C63**) which are all related to Items A (Wang Chiu Road housing sites) and/or other items (Items B, D1 and/or D2), or offer general views/concerns on the Plan; and
 - (b) Group 2: collective hearing of 5 representations (**R1 to R3, R10 and R8460**) and 23 related comments (**C40 to C60, C62 and C63**) which are related to Item C (KTM site), or offer general views/concerns on the Plan.
- 1.4 This paper is to provide the Board with information for consideration of the representations and comments in Group 2. A summary of the representations and comments in this group and the Government departments’ responses is at **Annex VI**. The representers and commenters have been invited to attend the meeting in accordance with section 6B(3) of the Ordinance.

2. **Background on BHR for KTM Site**

Site and Its Surroundings

- 2.1 The KTM site (the Site) (about 5,713m²) falls within an area zoned “R(A)” on the OZP (**Plans H-1 and H-2**). It was previously occupied by KTM which comprises four seven-storey private residential buildings with retail and workshops on the ground floor. Built in 1962 with a plot ratio (PR) of about 3.1, these buildings are under demolition for redevelopment. Abutting Kwun Tong Road, the Site is at a mean street level of about 4.6mPD with BHs of about 25.6 to 28.3mPD.
- 2.2 The Site is located in a medium- to high-rise residential neighbourhood and is closely surrounded by some low-rise buildings, schools and open spaces (**Plans H-3, 5a and 5b**):
- (a) to its northwest is Kwun Tong Road Children’s Playground and Grade 3 historic building of Sam Shan Kwok Wong Temple. To its further north and northwest are the medium-rise Ping Shek Estate (32-86mPD) and high-rise residential development named No. 8 Clear Water Bay Road (184mPD);
 - (b) to its immediate north and northeast are two Grade 1 historic buildings of the Officers’ Quarters Compound of the ex-Royal Air Force Station (Kai Tak) (ex-RAF) currently occupied by the Hong Kong Baptist University (HKBU) Academy of Visual Arts, which is located at a site level of 27.7mPD. To its further northeast is the Ping Shek Playground at 46mPD;

- (c) to its immediate southeast is the St. Joseph's Anglo-Chinese (SJAC) Primary School (eight storeys), and the former campus of SJAC School (six storeys). Choi Tak and Choi Ying Estates (133-174mPD) are to the further southeast; and
 - (d) to its west and southwest across Kwun Tong Road is Grade 1 historic building of ex-RAF Headquarters (occupied by Caritas Family Crisis Support Centre), Kai Yip Estate (42-59mPD), Kai Tai Court (60mPD) and a proposed public housing site at Wang Chiu Road (120mPD) under Item A.
- 2.3 The Site is located at the foothill of Jordan Valley. Following the topography, the area in the vicinity is generally characterized by a stepped BH profile (**Plan H-9**) with BHRs on OZP gradually increasing from west to east along the northeastern side of Kwun Tong Road towards the high-rise residential areas at the upper platforms of Jordan Valley, i.e. from BHRs of 80/100mPD for Ping Shek Estate, 140mPD for the Site to 160/170mPD for Choi Tak and Choi Fook Estates.

Judicial Review on Development Restrictions

- 2.4 On 19.11.2010, the draft Ngau Tau Kok and Kowloon Bay OZP No. S/K13/26 was exhibited for public inspection under section 5 of the Ordinance. Subsequently, further amended draft OZPs No. S/K13/27 and S/K13/28 were exhibited under section 7 of the Ordinance on 14.10.2011 and 11.4.2014 respectively. Five judicial review (JR) applications had been filed against the Board's decisions in respect of the above draft OZPs. The three JR applications lodged by the OGL (owner of KTM and representer of **R8460**) against the Board's decision on imposing the BH, non-building areas (NBAs) and building gap (BG) restrictions (Three Restrictions³) on the draft OZPs for the Site were allowed by the Court. A summary of the background of the draft OZPs, these JR applications and the main considerations in the Court judgements is at **Annex V**.
- 2.5 To follow up, the Planning Department (PlanD) had conducted a review with a view to formulating appropriate development restrictions for the Site taking into account the relevant principles and considerations set out in the concerned Court judgements. Taking into account the stepped BH profile in the area (paragraph 2.3 above), site conditions/constraints and the permissible development intensity under the "R(A)" zone, it was proposed to impose a BHR of 140mPD for the Site.

Visual Impact Assessment (VIA)

- 2.6 A VIA was conducted by PlanD to assess the potential visual impact arising from the future development at the Site. For the assessment, a notional scheme with a BH of 140mPD is adopted. The scheme has taken into account the permissible development intensity for the Site⁴ with due regard to the requirements of the Sustainable Building Design (SBD) Guidelines and incorporation of some design

³ The Three Restrictions are: (i) BHR of 130mPD; (ii) two 10m-wide NBAs at the northeastern and southeastern boundaries; and (iii) a 20m-wide BG of 15mPD in the middle of the Site (**Plan H-1**).

⁴ Based on the maximum PRs allowed under the "R(A)" zone and the requirements under the Building (Planning) Regulations/Buildings Ordinance. A strip of land of about 141.63m² along Kwun Tong Road (**Plan H-3**) will be required to be surrendered for provision of a bus lay-by. Bonus GFA for the surrender has been included in the scheme. For details, please refer to the information on **Plan H-6**.

measures including NBAs, urban window and low podium. The indicative layout and section drawing and the assumed development parameters of the scheme are shown on **Plan H-6**.

- 2.7 As shown in the photomontages at **Plan H-7a** to **H-7i**, the VIA reveals that the notional scheme of 140mPD is compatible with the stepped BH profile in the area and views to the ridgelines of Lion Rock could generally be maintained, but major visual impact on ex-RAF Compound behind the site is inevitable. In view of the historic and architectural significance of ex-RAF Compound, design measures to mitigate the visual impact of the proposed development on the historic ambience of ex-RAF Compound are considered necessary. Apart from the measures proposed in the notional scheme, other mitigation measures including BG, building disposition/form, landscaped podium, compatible colour/materials/architectural design, screen/edge planting, etc. could be used to improve the visual permeability and mitigate the visual impact.

Air Ventilation Assessment (AVA)

- 2.8 An updated AVA by Expert Evaluation (EE) Study was undertaken by PlanD to review the air ventilation impact of the future development at the Site. As revealed in the AVA, prevailing winds would travel along major air paths (e.g. Kwun Tong Road). The future high-rise development at the Site would potentially block the prevailing winds and create wake regions in its immediate downstream including: (a) SJAC Primary School under northerly (N), south-westerly (SW) and WSW winds; (b) ex-RAF Compound under southerly (S), SW and WSW winds; and (c) Kwun Tong Road Children's Playground under east-north-easterly (ENE), E, ESE, SE and S winds. To minimize the local air ventilation impact on the immediate surrounding developments, it is recommended that the future high-rise development should avoid long building frontage along Kwun Tong Road, and adopt appropriate mitigation measures including building setback, permeable building design, a minimized podium, and gaps between podium and building towers above.

Recommended Mitigation Measures

- 2.9 As recommended in the VIA and AVA, there are various types of mitigation measures which may help address the potential adverse visual and air ventilation impacts on the surrounding areas. To allow for flexibility for the developer to come up with appropriate and practical measures to address the impacts based on its own building design at the detailed design stage, it is recommended that no NBA/BG be imposed on the OZP for the Site. In order to address the potential air ventilation issues, a quantitative AVA is required at the detailed design stage to identify effective mitigation measures, such as NBA/BG/setback, to facilitate a permeable building design and to minimize adverse air ventilation impact on the surrounding low-rise buildings, in particular the Grade 1 historic buildings of ex-RAF Compound and the nearby school. In addition, the future developer is encouraged to adopt suitable design measures as recommended by the VIA to minimize the visual impact on the surrounding areas and to consult the Antiquities and Monument Office of the Leisure and Cultural Services Department on the development proposal with reference to its impacts on and compatibility with the adjoining ex-RAF Compound. Such intention/requirement is stated in the ES of the OZP, and would be considered to be incorporated into the lease conditions

during the lease modification stage as appropriate.

MPC Consideration

- 2.10 The OZP amendments were agreed by the Metro Planning Committee (MPC) of the Board on 17.3.2017. The relevant MPC Paper No. 1/17 and the minutes of the MPC meeting are deposited at the Board's Secretariat for Members' inspection. The MPC Paper and the minutes are also available at the Board's website. The VIA and AVA (EE) conducted to support rezoning the Site were included in MPC Paper No. 1/17 considered by MPC on 17.3.2017.

3. Consultation with Kwun Tong District Council

- 3.1 Prior to submission of the proposed OZP amendments to MPC for consideration, the Kwun Tong District Council (KTDC) was consulted on 10.1.2017. For the Site, some members raised suggestions on the proposed BHR and the uses to be included in the proposed development. KTDC's views together with the responses of Government departments and the proposed amendments to the OZP were reported to MPC on 17.3.2017.
- 3.2 During the exhibition period of the amended OZP, KTDC was further consulted on 9.5.2017. For the Site, Members suggested providing a public transport interchange (PTI) or bus-bus interchange (BBI) at the Site to alleviate the traffic congestion in the area and a lift system to connect with Choi Tak, Choi Fook and Choi Ying Estates. PlanD and concerned departments responded to the relevant issues at the meeting. The extract of the minutes of the meeting is at **Annex VII**.

4. The Representations

4.1 Subject of Representations (Plan H-2)

- 4.1.1 5 representations are covered in Group 2. They were submitted by individuals and OGL in respect of Item C covering the Site. Their views are as follows:

(a) **R1 to R3** support the amendment; and

(b) **R10 and R8460** oppose the amendment.

- 4.1.2 The representations are at **Annex III**, and a summary of the representations and Government departments' responses is at **Annex VI**.

4.2 Major Grounds of Representations

Supporting

- 4.2.1 **R1 to R3** support the amendment without giving reasons.

Opposing

R10

- 4.2.2 **R10** opposes the amendment and consider that the amendments on the OZP have an enormous negative impact on an already over developed district. There are significant ventilation and air circulation issues. The impact on heritage is significant. The urban window and low podium as proposed in the notional scheme and other mitigation measures to improve the visual permeability and mitigate the visual impact are not effective. The images of the redevelopment indicate the overpowering nature of the proposed residential blocks and the disproportionate impact they would have on the surrounding areas.

R8460

- 4.2.3 **R8460** was submitted by OGL, the owner of the Site. The representer objects to the BHR of 140mPD for the Site and puts forward a development scheme with a BH of 160mPD with supporting VIA, AVA and landscape proposal (**Annex IIIa**). The major grounds are summarized below:

PlanD's Notional Scheme of 140mPD

- (a) in 2010, they submitted a redevelopment proposal to the Building Authority consisting of two residential towers at 203mPD, which was rejected due to non-compliance with the then OZP. Having considered the judgement of the relevant JR, they lowered the proposed BH to 160mPD with improvement in landscape, visual and air ventilation aspects. The proposed development will comprise two 35-storey residential towers over a 6-storey non-domestic podium for hotel, retail, podium garden and carpark at a total PR of 9⁵ (**Drawings H-1a to H-1h**). The development will incorporate (i) setback at different levels with varying widths from each side of the Site; (ii) void on ground, fifth and sixth floors; (iii) a building gap of about 32m between the two residential towers; (iv) stepped profile with articulated building forms and (v) a stepped landscaped garden on top of podium;
- (b) given the existing BHR of 160mPD for Choi Tak Estate at the east, there is no solid justification for the notional scheme of 140mPD adopted by PlanD. Neither VIA nor AVA have been carried out for a scheme of 150mPD or even 160mPD, hence the notional scheme of 140mPD is arbitrary;

R8460's Proposed Development of 160mPD

- (c) with due respect to the judgement of JR, the representer has substantially lowered their proposed BH from 203mPD to 160mPD so as not to jeopardize the stepped BH profile in the district;
- (d) according to their VIA, the stepped BH profile in the district and views to the ridgeline and Lion Rock could be generally maintained. Among the

⁵ The major development parameters are provided in Section B 5.1 of the VIA at Annex D of representer's submission (**Annex IIIa**). However, the respective PRs for domestic and non-domestic portions, site coverage, as well as the number of residential units and hotel rooms have not been clearly provided in the submission. Based on counting on drawings, there are 180 hotel rooms between 1/F and 4/F of the scheme.

viewing points adopted in PlanD's VIA, the proposed development would not generate significant adverse impact to the neighbourhood (**Drawings H-2a to H-2r**). More importantly, any reasonable development which is taller and larger than the existing buildings at the Site will have a high degree of visual change and a high degree of visual impact upon the visual resources;

- (e) based on the AVA, comparing with 140mPD scheme, the proposed development of 160mPD will not generate significant adverse impact to the surrounding areas in respect of air ventilation. The resulting local impacts of the two schemes are considered similar. With greater BH, there would be more flexibility for building design to provide mitigation measures and enhance the surrounding pedestrian wind flow; and
- (f) the proposed development has incorporated various measures (setback, voids, building gaps and stepped building form) to improve visual permeability and air ventilation. In particular, a building gap of 32m wide between the two towers could relieve the wall effect and enhance the visibility of the historic buildings at rear (**Drawing H-1h**). A landscaped garden is designated at podium deck level with its headroom increased to 13m (6F for recreational facilities and 5/F for garden), which is more or less the same height as the historic buildings.

4.3 Representer's Proposal

R8640 proposes a BHR of 160mPD for the Site.

5. Comments on Representations

- 5.1 23 comments are covered in Group 2. The comments are at **Annex IV**, and a summary of the comments and Government departments' responses is at **Annex VI**. **C40** was submitted by **R8460** (OGL), providing a further quantitative AVA by Initial Study supporting a BHR of 160mPD at the Site. According to the AVA, the local and surrounding velocity ratio is the same for **R8460's** 160mPD scheme and PlanD's 140mPD scheme under annual and summer conditions, while slight improvements in some areas are found in their scheme.
- 5.2 **C41 to C60** were submitted by two KTDC members and individuals, without specifying the representation to which they are related. **C41 to C49** consider that a PTI or a BBI should be provided at the Site so as to alleviate the traffic congestion along Kwun Tong Road and in the Kwun Tong area and to provide safe and convenient pick up and drop off point for passengers. Some of them proposed other facilities at the Site, including public car parking spaces, clinic, retail and leisure facilities. Some suggest increasing the BHR for the Site to 180mPD.
- 5.3 **C50 to C60** also suggest the provision of PTI, BBI or a covered and safe place for loading and unloading of passengers, as well as a big shopping mall but do not specify its location, and consider that there is a need to address the traffic congestion problem in the area. **C62** was submitted by **R10**, reiterating her concerns on the adverse visual and air ventilation impacts of the proposed development at the Site. **C63** opposes the Plan without providing reasons.

6. Planning Considerations and Assessment

6.1 Representation Site and its Surroundings

The Site and its surroundings are set out in paragraph 2 above. On land status, the Site is situated on section B and remaining portion (S.B & R.P.) of New Kowloon Inland Lot (NKIL) No. 167 and S.B & R.P. of NKIL No. 168. NKIL 167 & 168 are each held under two separate Government Leases both dated 16.3.1921 as varied by the Deed of Variation of Crown Lease dated 26.2.1963. The leases of the lots are unrestrictive except for a non-offensive trade clause and height restrictions (not exceeding the level of the lawn (about 27.7mPD) of ex-RAF Compound). Any proposed high-rise development will require modification of the height restriction under the leases.

6.2 Planning Intention

The “R(A)” zone is intended primarily for high-density residential developments. Commercial uses are always permitted on the lowest three floors of a building or in the purpose-designed non-residential portion of an existing building.

6.3 Responses to Grounds of Representations

Supportive

6.3.1 The supportive view of **R1 to R3** is noted.

Opposing

R10

6.3.2 Regarding **R10**’s concern on the adverse visual and air ventilation impacts of high-rise development at the Site, the Site is zoned “R(A)” on the OZP which is primarily intended for high-density development. The current OZP amendments only involve imposition of a BHR for the Site, without changing the zoning and planning intention for the Site. Any proposed high-density redevelopment at the Site as permitted under the “R(A)” zone will inevitably have some visual and air ventilation impacts on the uses in its close proximity particularly the historic buildings at the rear. In setting the BHR for the Site, balanced considerations were given to the permitted development intensity under the “R(A)” zone, intended stepped BH profile in the area and room for incorporating suitable design measures to address the possible adverse impacts. The BHR of 140mPD for the Site is considered visually compatible with the residential developments in the surrounding areas and in line with the stepped BH profile in the area (**Plan H-9**), and as demonstrated in the notional scheme prepared by PlanD, will allow room for incorporation of good design measures.

R8460

PlanD’s Notional Scheme of 140mPD

- 6.3.3 The BHR of 140mPD for the Site was formulated with reference to relevant considerations as stated above. In particular, the BHR is in line with stepped BH concept in the area with BHRs on OZP gradually increasing from west to east along Kwun Tong Road, i.e. from BHR of 80/100mPD for Ping Shek Estate and 140mPD for the Site at the lower part to 160/170mPD for Choi Tak and Choi Fook Estates at the upper platforms of Jordan Valley (**Plan H-9**). VIA and AVA conducted have confirmed the acceptability of the BHR from visual and air ventilation aspects.
- 6.3.4 Citing the BHR of 160mPD for Choi Tak Estate, the representer considers the BHR of 140mPD for the Site arbitrary, and VIA and AVA should be conducted for other possible BHRs. As clearly explained in the preceding paragraphs, the BHR of 140mPD is in line with the stepped BH profile in the area and can accommodate the permissible development intensity under the “R(A)” zone with room for incorporation of good design features. The BHR of 140mPD is considered reasonable and serves as a transition between the lower BHRs to the west and higher BHRs to the east with a height variation of at least 20m from the “R(A)” developments in other adjacent height bands to achieve a more discernible BH profile for the area. As explained in paragraphs below, the alternative higher BHRs as suggested by the representer are considered not in line with the stepped BH profile and excessive when compared with the surrounding developments, and conducting of further VIA and AVA for other possible BHRs suggested is considered not justified.

R8460's Proposed Development of 160mPD

- 6.3.5 The BHR of 160mPD as proposed by the representer is considered not in line with stepped BH profile and excessive when compared with those for the “R(A)” developments in the surrounding areas. It is substantially taller than the BHRs for the adjoining housing developments on the two sides of Kwun Tong Road, including 80/100mPD for Ping Shek Estate and 120mPD for the proposed public housing development at Wang Chiu Road (**Plan H-9**). The adoption of taller BHRs of 160mPD/170mPD for Choi Tak Estate is mainly due to the fact that the Estate is located on 2 platforms with site levels at 41mPD and 60.5mPD respectively with an absolute BH of about 119m and 109.5m respectively (i.e. BHR minus site level). In comparison, with a site level of about 4.6mPD, the BHR of 140mPD for the Site allows an absolute BH of 135m, which is much higher than those for Choi Tak Estate, with sufficient room for incorporation of good design measures and accommodate the permissible development intensity under the “R(A)” zone. There is no strong justification for adoption of a higher BHR for the Site.
- 6.3.6 While the representer's VIA and AVA conclude that the proposed redevelopment will not generate adverse visual and air ventilation impacts on the surrounding areas, the proposed BHR of 160mPD is considered not in line with the intended stepped BH profile and excessive when compared with surrounding residential developments. The alternative scheme of 160mPD submitted by the representer is based on a specific building design. Apart from design measures proposed to mitigate the possible impacts e.g.

elevated landscaped garden, BG between the two residential towers and stepped profile for the residential towers, a specific design with the assumption of a floor to floor height of 3.5m for residential floors and a 6-storey podium for hotel and other uses have been adopted. As demonstrated in the notional scheme of PlanD, the BHR of 140mPD for the Site can accommodate the permitted development intensity under the “R(A)” zone with room for incorporation of good design measures to mitigate the possible visual and air ventilation impacts. A higher BHR on OZP is not justified. If the representer would like to pursue a taller BH based on a specific scheme with own building design justifications, a s.16 planning application for minor relaxation of the BHR could be submitted to the Board to demonstrate the planning and design merits and the overall acceptability of their proposal.

6.3.7 The development scheme submitted by the representer to support the proposed BHR of 160mPD has incorporated hotel use in the podium, which is a Column 2 use in “R(A)” zone requiring planning permission from the Board. Also, a high floor to floor height of 3.5m and stepped profile (**Drawings H-1g and H-1h**) have been adopted for the residential floors. The Chief Building Surveyor/Kowloon, Buildings Department (CBS/K, BD) advised that it is not certain whether the PR and site coverage calculation are within the limits stipulated in Building (Planning) Regulations (B(P)Rs), and the granting of hotel concession under B(P)R 23A could only be confirmed at building plan submission stage.

6.3.8 As shown on the OZP, a strip of land of about 141.63m² within the lot along Kwun Tong Road (**Plan H-3**) is shown as ‘Road’ and will be required to setback for provision of a bus lay-by. This has not been provided for in representer’s scheme. The Commissioner for Transport (C for T) advises that the proposed setback is essential for the formation of a bus lay-by to accommodate stops for numerous bus and mini-bus services to alleviate the congested traffic situation along Kwun Tong Road eastbound arising from frequent passenger boarding and alighting activities along the slow lane. On the basis of the above, the representer has not demonstrated that their proposed development scheme is acceptable from planning, building and transport aspects.

6.4 Responses to Representer’s Proposal

The BHR of 160mPD proposed by **R8460** is not supported for reasons set out above.

6.5 Responses to Grounds of Comments

6.5.1 **C40** was submitted by **R8460**, contains a quantitative AVA report to substantiate its representation. The responses in paragraph 6.3.6 above are relevant.

6.5.2 Regarding the views of **C41 to C60** on providing a BBI at the Site or other areas, C for T advises that BBI schemes are in place for a number of bus routes operating via Kwun Tong Road and Lung Cheung Road, Wong Tai Sin for the convenience of passengers travelling from Wong Tai Sin and Kwun Tong to other districts. The Government has been striving to identify

suitable locations for setting up new BBIs or enhance the services and facilities of existing BBIs, with a view to improving the bus network coverage of BBIs, reducing the number of buses on roads, and alleviating traffic congestion and air pollution. In this connection, the Government has put forward proposals to enhance the BBI facilities at the existing bus stops at Prince Edward Road East eastbound and westbound in San Po Kong outside the Latitude (**Plan H-8**). The above arrangement can ensure the provision of an efficient transport network for passengers of Wong Tai Sin and Kwun Tong. Therefore, he has reservations on the suggested provision of an additional BBI at the Site. It also needs to point out that the Site would need to be setback from Kwun Tong Road to form a lay-by to facilitate passenger boarding and alighting, and help alleviate the congested traffic situation contributed by the busy loading/unloading activities currently taking place along the slow lane of Kwun Tong Road.

- 6.5.3 On PTI, taking into account various modes of public transport services, including railway services, numerous bus routes and public light bus services available in the vicinity, C for T has reservations on the suggested provision of a PTI or bus terminus inside the Site.
- 6.5.4 The Site is under private ownership. The provision of public facilities at the Site should be justified and is subject to the discussion with the land owner. Based on the provision standards in the Hong Kong Planning Standards and Guidelines (HKPSG), the provision of clinic in the area is sufficient. On the provision of retail facilities, it is always permitted in the lowest three floors of the development and some are proposed in the representer's development scheme. Regarding public car park, it is a Column 2 use in the "R(A)" zone. C for T advises that the developer is required to provide ancillary car parking spaces for the development itself in accordance with the requirements of HKPSG.
- 6.5.5 Regarding the BHR of 180mPD proposed by some commenters, it is even higher than 160mPD as proposed by **R8460**. The responses in 6.3 above are relevant.
- 6.5.6 For **C62** submitted by **R10**, the responses to **R10** in paragraph 6.3.2 are relevant.

7. **Departmental Consultation**

The following Government departments have been consulted and their comments have been incorporated in the above paragraphs, where appropriate:

- (a) Director of Environmental Protection;
- (b) Director of Fire Services;
- (c) C for T;
- (d) Chief Highway Engineer/Kowloon, Highways Department;
- (e) Chief Building Surveyor/Kowloon, Buildings Department;
- (f) District Lands Officer/Kowloon East, Lands Department;
- (g) District Officer (Kwun Tong), Home Affairs Department;

- (h) Project Manager/Kowloon, Civil Engineering and Development Department (CEDD);
- (i) Head of Geotechnical Engineering Office, CEDD;
- (j) Chief Architect/Central Management Division 2, Architectural Services Department;
- (k) Chief Engineer/Construction, Water Supplies Department; and
- (l) Chief Town Planner/Urban Design and Landscape, PlanD.

8. **Planning Department's Views**

- 8.1 The supportive view of **R1 to R3** is noted.
- 8.2 Based on the assessment in paragraph 6 above and for the following reasons, PlanD does not support R10 and R8460 and considers that the Plan should not be amended to meet the representations:
- (a) in setting the BHR of 140mPD for the Site, due considerations have been given to the permitted development intensity under the “R(A)” zone, the intended BH profile for the area and the room for incorporation of design measures to mitigate the possible visual and air ventilation impacts. The BHR of 140mPD is considered acceptable (**R10 and R8460**); and
 - (b) the BHR of 160mPD proposed by the representer is considered not in line with the intended stepped BH profile for the area and excessive when compared with those for the residential developments in the surrounding areas (**R8460**).

9. **Decision Sought**

The Board is invited to give consideration to the representations and decide whether to propose/not to propose any amendment to the Plan to meet/partially meet the representations.

10. **Attachments**

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| Annex I | Draft Ngau Tau Kok and Kowloon Bay OZP No. S/K13/29 (reduced size) |
| Annex II | Schedule of Amendments to the draft Ngau Tau Kok and Kowloon Bay OZP No. S/K13/28 |
| Annex III | <u>Representations in Group 2</u> [TPB Members only] |
| IIIa | Submission of R8460 (including VA, AVA (EE) and Landscape Proposal) |
| IIIb | Other Representations |
| Annex IV | <u>Comments in Group 2</u> [TPB Members only] |
| IVa | Submission of C40 (including Quantitative AVA) |
| IVb | Other Comments |
| Annex V | Summary of Background of Draft OZP, Judicial Review Applications in respect of KTM site and Main Considerations in Court Judgement |
| Annex VI | Summary of Representations and Comments and Government Departments' Responses |
| Annex VII | Extract of Minutes of KTDC meeting held on 9.5.2017 |

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| Drawing H-1a-1h | Indicative Development Scheme (160mPD) submitted by R8460 |
| Drawing H-2a-2r | Photomontages in VIA prepared by R8460 |
| Plan H-1 | Comparison Between Previous and Current Zoning |
| Plan H-2 | Location Plan of Representation Site |
| Plan H-3 | Site Plan |
| Plan H-4 | Aerial Photo |
| Plan H-5a-5b | Site Photos |
| Plan H-6 | Notional Scheme Plan (140mPD) prepared by PlanD |
| Plan H-7a-7i | Photomontages in VIA prepared by PlanD |
| Plan H-8 | Proposed BBI at Prince Edward Road East |
| Plan H-9 | BHRs of the R(A) Zones in the Surrounding Areas |

PLANNING DEPARTMENT
NOVEMBER 2017

