

**CONSIDERATION OF REPRESENTATIONS NO.
R1 TO R3 (PART), R4 TO R9, R10 (PART), R11 TO R8459
COMMENTS NO. C1 TO C39 AND C50 TO C60 (PART), C61, C62 TO C63 (PART)
IN RESPECT OF THE DRAFT NGAU TAU KOK AND
KOWLOON BAY OUTLINE ZONING PLAN NO. S/K13/29
(Group 1)**

Subject of Representations	Representers	Commenters
<p><u>Amendment Item (Item) A</u> Rezoning of two sites at Wang Chiu Road (WCR) from “Open Space” (“O”) to “Residential (Group A)” (“R(A)”) with stipulation of building height restriction (BHR);</p> <p><u>Item B</u> Rezoning of a site at WCR from “O” to “Government, Institution or Community” (“G/IC”) with stipulation of BHR;</p> <p><u>Item D1</u> Rezoning of a small piece of land at Kwun Tong Road to the north of Kai Yip Estate from “O” to “G/IC” with stipulation of BHR; and</p> <p><u>Item D2</u> Rezoning of four strips of land along Prince Edward Road East, Kwun Tong Road, Wang Chiu Road and Wang Kwong Road from “O” and “G/IC(2)” to areas shown as ‘Road’</p>	<p><u>Support (Total: 8)</u></p> <p><u>Items A and B</u> R1 to R3 (part)¹ and R4: individuals</p> <p><u>Item A</u> R5 to R8: individuals</p>	<p><u>Total: 53</u></p> <p><u>Support R1</u> C1: individual</p>
	<p><u>Oppose (Total: 8,448)</u></p> <p><u>Items A and B</u> (8,440)</p> <p><u>Legislative Council (LegCo) Member</u> Hon Wu Chi-wai, R1150</p> <p><u>Kwun Tong District Council (KTDC) Members (7)</u> Mr Bux Sheik Anthony, R13 Mr Chan Man-kin, R1151 Mr Mok Kin-shing, R1152 Mr Ma Yat-chiu, R1290 Ms Tse Suk-chun, R1291 Mr Wong Chi-ken, R1292 Mr Cheng Keng-ieong, R1293</p> <p><u>Wong Tai Sin (WTS) DC Member</u> Mr Wu Chi-kin, R1153</p> <p><u>Kowloon City (KC) DC Member</u> Mr He Hauhan, R1288</p> <p><u>Community officers of a political party</u> R1154 to R1156</p> <p><u>Residents’ Committee of Kai Yip Estate</u></p>	<p>Oppose R13 and R1150 to R1156 C1</p> <p>Support various representations and Oppose Items A and B C2 to C39 and C62 (part)¹: individuals</p> <p>Provide general comments C50 to C60 (part)¹, C61 and C63 (part)¹: Green Sense (C61) and individuals</p>

¹ **R1-R3, R10** and **C62** are also in respect of Item C. **C50-C60** and **C63** are general in nature. The concerned parts of them will be covered and discussed in the TPB paper No. 10354 for Group 2.

	<p>R1157</p> <p><i>Non-governmental Organization (NGO)</i> Christian Action (CA), R9 [also support Item D1]</p> <p><i>Sports organization</i> Hong Kong Rugby Union, R12</p> <p><i>Local Residents/users/employees/partner organizations of CA/individuals</i> R10 (part)¹, R14 to R1149, R1158 to R1287 and R1294 to R8452 [R10 and R14 to R831 also oppose other amendments to the Plan]</p> <p><i>Item A (7)</i> R8453 to R8459</p> <p><i>Item A, D1 and D2 (1)</i> R11</p>	
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Note: A CD-ROM containing names of all representers and commenters as well as their submissions is enclosed at **Annex VI** [for Town Planning Board Members only]. The names of all representers and commenters can be found at the Town Planning Board's website at http://www.info.gov.hk/tpb/en/plan_making/S_K13_29.html

1. **Introduction**

- 1.1 On 13.4.2017, the draft Ngau Tau Kok and Kowloon Bay Outline Zoning Plan (OZP) No. S/K13/29 (**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**. 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. A total of 63 comments were received. Subsequently, two representers (**R1362 and R1686**) wrote to the Secretariat of the Board stating that they had not submitted any representation.
- 1.2 The amendments (**Plan H-1**) mainly involve rezoning of two sites at WCR from "O" to "R(A)" (Item A); rezoning of a site between the two sites under Item A from "O" to "G/IC" (Item B); stipulation of BHR for a "R(A)" zone covering Kai Tak Mansion (KTM) site at Kwun Tong Road (Item C); rezoning of various sites to reflect their as-built condition as a drainage facility (Item D1) and roads (Item 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 collectively in two groups as follows:

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

- (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.
- (b) Group 2: 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 Group 1. A summary of representations and comments for this group and the Government bureaux/departments' responses is at **Annex V**. The representers and commenters have been invited to attend the meeting in accordance with section 6B(3) of the Ordinance.

2. **Background**

- 2.1 Housing is one of the most important livelihood issues to be addressed by the Government. The Government has been increasing land supply through a multi-pronged approach with short, medium and long-term measures to achieve the target to provide a total of 460,000 housing units in the coming ten years. To help meet the acute housing demand, a piece of Government land at WCR has been identified as a potential public housing site. It is part of a larger "O" zone (**Plan H-1**) intended for the development of a district open space, which has no definite development programme. Considering that there is sufficient provision of open space in the Ngau Tau Kok and Kowloon Bay area as well as in the Kwun Tong district, the Director of Leisure and Cultural Services has no objection to release the piece of land at WCR for other purposes, i.e. public housing and school developments. The development parameters of the proposed public rental housing (PRH) development are as follows:

	Eastern Portion (Phase 1)	Western Portion (Phase 2)	Total
Site Area (about)	1.71ha	0.97ha	2.68ha
Maximum Domestic/Total PR	7.5/9		
BHR	120mPD		
No. of Blocks	3	2	5
Estimated No. of Units	2,650	1,450	4,100
Estimated Population	6,650	4,050	10,700

- 2.2 The land for the PRH and school developments has an area of about 3.38ha. It is a piece of Government land comprising various temporary uses (**Plans H-4** and **H-5**), including the Hong Kong Fire Services Club (HKFSC) of the Fire Services Department, a contractor depot and a maintenance depot of the Highways Department (HyD), a temporary garden of the Caritas Family Crisis Support Centre (FCSC), and the New Horizons Building (NHB) currently occupied by the CA. The eastern (1.71ha) and western (0.97ha) portions of the land is rezoned for public housing development (Item A on **Plan H-2**) by the Housing Department (HD), while the

middle portion (6,950m²) for development of a secondary school with 30 classrooms (Item B) by the Education Bureau (EDB). Opportunity is also taken to amend the zonings of some adjacent sites to reflect their existing uses, including Kowloon Bay Dry Weather Flow Interceptor Pumping Chamber (Item D1) and four strips of land currently occupied by roads (Item D2).

2.3 The OZP amendments are:

Item A: rezoning of two sites at WCR to the north of Richland Gardens from “O” to “R(A)” with stipulation of BHR and addition of a symbol on the Plan to link the two “R(A)” sites.

Item B: rezoning of a site at WCR to the north of Richland Gardens from “O” to “G/IC” with stipulation of BHR.

Item D1: rezoning of a small piece of land at Kwun Tong Road to the north of Kai Yip Estate from “O” to “G/IC” with stipulation of BHR.

Item D2: rezoning of four strips of land along Prince Edward Road East, Kwun Tong Road, Wang Chiu Road and Wang Kwong Road from “O” and “G/IC(2)” to areas shown as ‘Road’.

2.4 The proposed OZP amendments were considered and agreed by the Metro Planning Committee (MPC) of the Board on 17.3.2017. The relevant MPC Paper No. 1/17³ 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 OZP was exhibited under section 7 of the Ordinance on 13.4.2017 (**Annexes I and II and Plan H-1**).

3. **Public Consultation**

3.1 Prior to submission of the proposed OZP amendments to MPC for consideration, KTDC was consulted on 10.1.2017. For the WCR sites, KTDC raised concerns on the traffic impact of the proposed development and inadequacy of GIC facilities to serve the local community, and considered that the reprovisioning of CA premises should be properly handled. Written submissions were also received from two LegCo members, five KTDC members, CA, local concern group (麗晶居民權益關注組) and members of general public. Besides, representatives of the Planning Department (PlanD) and the HD attended a local forum organized by the KTDC member for the constituency of Richland Gardens, Mr. Bux Sheik Anthony, on 20.1.2017. In general, the written submissions and the residents attending the forum all raised objection to or concerns on the proposed development at the WCR sites. The views collected from the KTDC, local forum and written submissions, together with the proposed OZP amendments, were considered by MPC on 17.3.2017. Detailed responses of the concerned Government departments to the views received

³ The full or extract of the relevant technical assessments conducted to support the proposed public housing development (i.e. air ventilation assessment, visual appraisal, traffic impact assessment, quantitative risk assessment and preliminary tree survey) are attached in the MPC Paper. A full set of the assessments are also deposited at the Board’s Secretariat for members’ inspection.

are summarized in Attachment XI of MPC Paper No. 1/17.

- 3.2 During the exhibition period of the OZP, KTDC was further consulted on 9.5.2017. Members maintained their concerns on the traffic impact, provision of GIC facilities and reprovisioning of CA's premises. PlanD and concerned departments responded to the relevant issues at the meeting. The relevant extract of the minutes of the meeting is at **Annex III**.

4. **The Representations**

4.1 **Subject of Representations (Plan H-2)**

- 4.1.1 The 8,456 representations covered by this paper are related to Items A and/or B, D1 and D2. A full set of the representations and comments are in the CD-Rom at **Annex VI**. A full set of hard copy is also deposited at the Secretariat of the Board for Members' inspection.
- 4.1.2 Among the 8,456 representations, 8 are supportive (**R1 to R8**) and submitted by individuals, and 8,448 (**R9 to R8459**) are adverse in nature and submitted by LegCo members, KTDC, WTSDC and KCDC Members (**R13, R1150 to R1153, R1288 and R1290 to R1293**), community officers of a political party, a residents' committee of Kai Yip Estate (**R1157**), CA (**R9**), Hong Kong Rugby Union (**R12**), local residents, users/employees/partner organizations of CA and individual members of the public. 8,440 oppose Items A and B, while 8 oppose Items A and/or Items D1 and D2. The KTDC member for the Richland Gardens constituency, Mr. Bux Sheik Anthony (**R13**), has submitted the results of a questionnaire survey of the residents of Richland Gardens indicating that most respondents oppose the OZP amendments, and relayed the signatures of residents objecting to the Plan (**R14 to R831**). Among the representations, about 6,768 are in three types of standard letters/forms.

4.2 **Major Grounds of Representations**

*Supportive (**R1 to R8**) (8)*

- 4.2.1 They support Items A and/or B mainly on grounds that the amendments would better utilize the underutilized land at WCR to meet the pressing demand for housing and school in the community. Some consider that the development intensity should not be too high taking into account the traffic capacity and the public transport and out-patient clinic services in the area should be enhanced.

*Adverse (**R9 to R8459**) (8,448)*

- 4.2.2 The major grounds of these representations are summarized below.

Items A and B

Retention/Reprovisioning of CA's Premises

- (a) The NHB at the WCR sites has been used by CA, a non-subvented charitable

organization, for over 30 years providing a wide range of social services to benefit the communities within the districts of Kwun Tong, Wong Tai Sin and Kowloon City. The services offered are essential to maintain the level of welfare in these districts contributing to social stability, filling the service gaps that can hardly be covered by the existing social welfare system.

- (b) As CA's headquarters, NHB acts as a pillar for the coordination of the organisation's 20 social services and training centres and 5 community sales outlets across Kowloon and New Territories, and serves as a base providing social services for the disadvantaged and underprivileged. The demolition of NHB would not only cause a disruption to CA's services, but may lead to more social issues, particularly for Kwun Tong with influx of new residents from the proposed public housing development. The financial repercussion on Government will increase if without CA to serve the less fortunate.
- (c) Without NHB, CA may not only have to terminate their services and in the worst case will have to either downsize or close down the entire organization. CA's services should be recognized and supported by the Government and should not be treated like other temporary uses (such as carpark) without reprovisioning. The social service needs should also be fulfilled while meeting housing demand.
- (d) The current Hong Kong Planning Standards and Guidelines (HKPSG) are inadequate in considering many community, welfare and religious facilities which play an important role in community welfare and well-being. Thus, the importance of CA cannot be fully recognized by HKPSG.
- (e) There is a wide support from LegCo/DC members, local residents/concern groups from Richland Gardens and Kai Yip Estate, CA's working partners and members of the general public for retention/reprovisioning of existing premises of CA in NHB.

Preservation of Buildings

- (f) NHB was built in the 1970s and in good condition. It is in memorial of a captain of Hong Kong Air Force with unique architectural style. In view of their heritage value, the NHB and/or the adjacent building should be preserved and revitalized for community or educational uses. Some also suggest retaining the adjacent HKFSC for its historical value, leisure facilities or preservation of open view.

Supporting Infrastructure, G/IC and Retail Facilities

- (g) The proposed high-density infill development of public rental housing (PRH) lacks comprehensive planning of supporting infrastructure and facilities for the district. The increased population will result in higher population density adversely affecting the quality of living in an already overcrowded environment with little breathing space. Without sufficient supporting facilities to cope with the population increase, social problems will emerge in the area.

- (h) The existing G/IC and retail facilities in the area are not sufficient to support the population in Richland Gardens, Kai Yip Estate and Kai Tai Court, such as kindergarten, child care centre, library, study room, medical services, youth/elderly/rehabilitation facilities, community hall, leisure/sports facilities, cooked food centre, public market and police station. Prior to any new development, more G/IC and retail facilities should be provided to meet the increasing demand. Some suggest provision of a municipal services building to accommodate additional G/IC and market facilities with some space reserved for CA.

Secondary School

- (i) There are excessive secondary schools in the OZP area or Kwun Tong district, with many vacant schools. With the aging population, it is in doubt that there are enough students to attend the new school. There is no justification for a new secondary school at the WCR site. To meet any unforeseeable demand, additional school should be identified in the newly planned area of Kwun Tong district, such as Anderson Road Quarry (K14N: Kwun Tong (North) planning area).
- (j) The proposed school site is too close to Kwun Tong Road, and the noise pollution from the heavy traffic would affect the study environment of the students.

Open Space Provision and Greenery

- (k) The planned open space has not been implemented by the Government and the proposal has deprived local residents of leisure space. Hong Kong Rugby Union (**R12**) raises concern on the significant reduction of the “O” zone which will restrict the options for the provision of active and passive recreation facilities in the remaining area. With the increase in population, more open space such as rugby pitch, botanic garden or recreational facilities for the elderly and families should be provided.
- (l) There are many old trees around the rezoned areas/along the roads and should be preserved as far as possible to maintain the greenery.

Traffic and Transport

- (m) The proposed PRH developments, together with other new developments, e.g. those at Kai Tak Development and the commercial development in East Kowloon, would overload the surrounding road networks as revealed in the queuing back of traffic from the congested Kwun Tong Road/Prince Edward Road East and the traffic congestion at Choi Hung Roundabout and New Clear Water Bay Road. Traffic congestion will not only lengthen the travel/queuing time of workers and students but also risk the timely provision of emergency services. There should be improvements to the road network such as addition of road connections to Kwun Tong Road/Kwun Tong By-Pass and To Kwa Wan.

- (n) The planned Trunk Road T2 together with the proposed Central Kowloon Route (CKR) would not be completed in time to ease the imminent and worsening traffic congestion resulted from the proposed increase in population.
- (o) The public transport services of the area (including buses, mini-buses and MTR Choi Hung Station and Kowloon Bay Station) have already been overloaded due to the additional demand from the public housing estates in Kai Tak. The influx of additional population from the proposed PRH development will aggravate the situation. There is also no drop-off area for cars. Some suggest the provision of transport nodes/bus terminus at the WCR sites while others suggest more frequent bus/mini-bus schedule particularly during peak hours, more bus routes and addition of MTR exit near Richland Gardens.

Vehicle Parking

- (p) There is a lack of parking spaces and illegal parking is severe around Richland Gardens, and endangers the safety of pedestrians. The surplus parking spaces in Kai Yip Estate are reserved solely for its residents.

Pedestrian Connectivity

- (q) The already congested pedestrian subway from the WCR sites to Ping Shek Estate (**Plans H-4 and H-10**) should be enhanced to cope with future demand. The connectivity with MTR Choi Hung Station and Kai Tak Station should be improved by installing covered and moving walkway.

Environmental, Air Ventilation and Visual Impacts

- (r) The impacts of the PRH development on the surrounding stakeholders have not been fully considered. The taller PRH development and narrow separation from Richland Gardens will worsen the living environment by creating heat island effect and obstructing visual openness, natural lighting and air ventilation in the area. Some suggest improving the design of the PRH development by reducing the number of building blocks/flats, altering the building disposition/design and/or reducing the BH.
- (s) The PRH development next to a busy highway will be subject to traffic noise. There would also be noise nuisances from the school bells of the nearby schools.
- (t) Noise, air pollution and other nuisances from the construction of the PRH development may create adverse impact to Richland Gardens due to its close proximity. Nuisances generated by traffic along WCR would be more severe due to the increase in traffic flow from the proposed PRH.
- (u) The PRH development will have adverse impact on the adjacent FCSC in

terms of privacy and safety. Building residential area nearby will create noise and hygienic problems, which will lead to further disturbances to the people in crisis, who may have suicidal or mental health problems. Open space development will be more compatible with FCSC.

Alternative Sites for Housing Development

- (v) The Kai Tak Development (with more land and better infrastructure/transportation), sports ground/soccer pitches/cycling ground near Richland Gardens or Fanling Golf Club could be considered for public housing development. The Kowloon Bay Sports Ground can be rezoned for public housing development with construction of footbridges connecting to Telford Gardens/MTR Kowloon Bay Station.
- (w) The proposed East Kowloon Cultural Centre to the east of Telford Gardens can be relocated to the WCR sites so as to make the site available for public housing development.

Public Consultation

- (x) The Government should truthfully listen to the opinion from the public extensively, face the public directly and take into account appeals from the public.

Other Views

- (y) The WCR sites are more suitable for development of private housing, subsidized sale flats or hotel.

Items D1 and D2

- (z) While opposing Items A and B, **R9** indicates support to Item D1, which is to reflect the existing use of a drainage facility, and considers the same principle should apply to the NHB site.
- (aa) **R11** opposes Items D1 and D2 on ground that leisure area should be retained for enjoyment by local residents and should not be changed into road.

4.3 Representers' Proposals

The representers' proposals are summarized as follows:

Retention/Reprovisioning of CA's Premises

- (a) To retain the existing premises of CA at NHB, or to identify alternative site/premises for CA such as vacant school. To withdraw Phase 2 of the proposed public housing development.

- (b) CA (**R9**) proposes two options by adjusting the zoning boundaries of the WCR sites so as to retain the NHB for use by CA. Option 1 allows PRH to coexist with CA with 4,310 flats without the provision of a secondary school while Option 2 allows PRH and secondary school to coexist with CA with 2,920 flats (**Drawings H-1a and H-1b**). However, neither detailed information about the two options nor supporting assessments have been provided.

Retain as Open Space

- (c) To retain the WCR sites for open space development rather than housing development.
- (d) To rezone the eastern portion of the WCR sites from “R(A)” to “O” so as to accommodate a rugby pitch.

Building Height

- (e) The BH of the PRH development should be reduced to not more than that of Richland Gardens (BHR of 100mPD, existing BH of 99-102mPD).

5. Comments on Representations

- 5.1 **C1** opposes **R13, R1150 to R1156**, and supports Item A about public housing development at the WCR sites, with the following views:
 - (a) the sizable site well served by public transport is suitable for public housing development to help meet the housing demand;
 - (b) oppose various adverse representations and consider that the retention of HKFSC and NHB would result in the decrease in the floor area of the public housing development; construction work for the East Kowloon Cultural Centre has commenced and the site is not available for public housing development; private development or shelving the public housing development would not help address the housing need of the grassroots. Subsidized sale flats can be considered; and
 - (c) CA can be reprovisioned at open vehicle park in the district.
- 5.2 **C2 to C39** are in support of various adverse representations objecting to the proposed public housing development and requesting for retention/reprovisioning of CA's premises. Their grounds are similar to those of the representers.
- 5.3 **C50 to C60** suggest the provision of public transport interchange (PTI), bus-bus interchange (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.
- 5.4 **C61** (Green Sense) considers that with the aging and increasing population, there is a need for more open space. Rezoning of “O” site will cause permanent irreversible impact on the community. The current planning standards for open space in Hong Kong lag behind those of other developed countries and are outdated. The rezoning is an extension of wrong policy of inserting new population in mature community. To

address the housing problem, apart from increasing land supply, there is a need to slow down the population growth.

- 5.5 **C62** considers that the removal of Urban Oasis (community farm) will lead to a series of health problem for the residents, particularly the elderly. The existing facilities in Kwun Tong area are not enough to support the aging population. Urban Oasis should be retained and the WCR sites should better be used for providing a school and facilities supporting the elderly. Such community uses and low-rise facilities would have minimal impact on ventilation.

- 5.6 **C63** opposes the Plan without giving reasons.

6. Planning Considerations and Assessment

6.1 The Representation Sites and the Surrounding Areas (Plans H-2 to H-6)

6.1.1 The representation sites are described in paragraph 2.2 above.

6.1.2 The WCR sites are located within a medium- to high-rise residential neighbourhood:

- (a) to the immediate northwest are three temporary uses, i.e. the Urban Oasis which is a community farm of the Christian Family Service Centre (CFSC), a works area of the Civil Engineering and Development Department (CEDD) and a maintenance depot of the HyD. This area remains under “O” zone;
- (b) to the south across WCR is Richland Gardens (99-102mPD). Kai Yip Estate (42-59mPD) and Kai Tai Court (60mPD) are located to the southeast;
- (c) to the immediate east is the Headquarters Building of the ex-Royal Air Force Station (Kai Tak) (ex-RAF HQ) which is a Grade 1 historic building currently occupied by FCSC;
- (d) to the north and northeast across Kwun Tong Road are Ping Shek Estate (32-86mPD) and Choi Hung Estate (26-60mPD). KTM site, the Officers’ Quarters Compound of the ex-RAF comprising of two Grade 1 historic buildings, the Grade 3 historic building of Sam Shan Kwok Wong Temple, the St. Joseph’s Anglo-Chinese (SJAC) Primary School, and the former campus of SJAC School at Choi Shek Lane are located to the east. Choi Tak and Choi Ying Estates (133-174mPD) are to the further southeast at the upper part of Jordan Valley; and
- (e) to the west across Shing Kai Road are Kai Ching and Tak Long Estates (106-120mPD) in Kai Tak Development.

6.2 Planning Intention

The planning intentions of the concerned zones are as follows:

- (a) “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.
- (b) The “G/IC” zone is intended primarily for the provision of Government, institution or community facilities serving the needs of the local residents and/or a wider district, region or the territory. It is also intended to provide land for uses directly related to or in support of the work of the Government, organizations providing social services to meet community needs, and other institutional establishments.

6.3 Reponses to Grounds of Representations

Supportive

- 6.3.1 The supportive views of **R1 to R8** on Items A and/or B and **R9**’s support to Item D1 are noted. Regarding their views of avoiding excessive development intensity, traffic impact and G/IC facilities, the responses in concerned paragraphs below are relevant.

Adverse

Items A and B

Retention/Reprovisioning of CA’s Premises

- 6.3.2 NHB was built in 1973 for use by the former Royal Air Force and then used as a Vietnamese refugees camp. Since 1998, CA has been allowed to use the NHB for training centre and ancillary office purposes on a temporary basis, providing employees retraining service under the aegis of the Employees Retraining Board (ERB). The temporary Government land allocation has been extended to 30.6.2018. All along, CA is allowed to use the site on a temporary basis. Upon implementation of permanent development for the site, the current temporary use should be terminated, and NHB has to be demolished for the proposed PRH and school developments at the WCR sites to meet the needs of the community.
- 6.3.3 Noting that CA has been using the NHB for ERB training purposes on a temporary basis since 1998, the Labour and Welfare Bureau (LWB) advises that if suitable premises can be identified for retraining and ancillary office used by CA, LWB may support the allocation of such premises for temporary use by CA under a rent paying short-term tenancy. LWB has been in liaison with concerned bureaux/departments for the identification of suitable temporary premises for such purpose. Recently, a to-be-vacated school premises at Choi Wan (II) Estate (i.e. PLK Chan Nam Chong Memorial Primary School in **Plan H-2**), which is about 1km away from the WCR sites, has been identified for reprovisioning of CA’s facilities on a temporary basis. The site is being considered by CA.

Preservation of Buildings

- 6.3.4 The NHB, a post-1970 building, has been included in the list of “New Item and New Categories” pending assessment by the Antiquities Advisory Board (AAB). Given the prevailing assessment criteria are designed for assessing historic buildings mainly built before 1950, the AAB agreed at its meeting on 10.9.2013 to defer the grading assessment of post-1970 buildings, including the NHB. The Antiquities and Monument Office of Leisure and Cultural Services Department suggest salvaging some representative features of NHB for incorporating in the future development if found feasible. HD will liaise with the Architectural Services Department (ArchSD) on this aspect at the detailed design stage.
- 6.3.5 The HKFSC at the site is only open to staff/members of Fire Services Department and their family, instead of the local community. It is not a historic building, and is planned to be reprovisioned to a site at To Wah Road, Jordan in 2019. There is no strong ground for retention of the building.

Supporting Infrastructure, G/IC and Retail Facilities

- 6.3.6 Taking into account the planned population in the area and the provision standards in HKPSG, the planned provision of G/IC facilities in the area is generally sufficient (**Annex IV**). In the vicinity of the site, a number of existing G/IC facilities including library, markets, clinic, sports ground, indoor sports centres have been provided (**Plan H-9**). Detailed responses to the provision of individual facilities are set out in section C2 of **Annex V**. Apart from the planned secondary school at the site, a number of G/IC facilities (residential care home for the elderly cum day care unit, child care centre and kindergarten) and retail facilities will be included in the proposed public housing development to meet the residents’ and local needs.

Secondary School

- 6.3.7 When reserving a school site, EDB will take into account a host of factors, e.g. the additional population arising from new housing development, the latest projected demand for school places in the long run, the prevailing educational initiatives (e.g. reprovisioning needs of existing schools operating at aged school premises with school facilities not meeting prevailing standards), etc. Having considered these factors and planned secondary schools in the district, including those in the Anderson Road Quarry area, a school site in Kwun Tong has to be reserved to meet the long term education needs. Regarding the concern on traffic noise impact from the adjacent roads, mitigation measures would be provided to meet statutory environmental requirements, if necessary, upon detailed design studies. Environmental Protection Department (EPD) has advised that no insurmountable noise problem is anticipated as there would be practicable mitigation measures to mitigate the noise impact.

Open Space and Greenery

- 6.3.8 The provision of open space in the Ngau Tau Kok and Kowloon Bay area as

well as Kwun Tong district meets the requirement stipulated in HKPSG⁴. For the Ngau Tau Kok and Kowloon Bay area, there is a surplus provision of 16.72 ha of district open space and 22 ha of local open space (equivalent to a total provision of 4.1m² per person). Regarding the type of facilities to be provided in open space project, LCSD would take into account factors such as the demand for such facilities, the usage of existing facilities, HKPSG, resource availability as well as the views of KTDC. For the proposed public housing development, HD will provide sufficient local open space and recreational facilities including basketball/badminton courts to serve the residents.

- 6.3.9 According to the tree survey conducted by HD (**Plan H-12**), there are about 240 trees at the WCR public housing sites and about 50 trees at the secondary school site. Most of the existing trees are common species with poor form and fair health in general. No rare species or Old and Valuable Tree (OVT) are identified but eight trees are with trunk diameter more than 1m. It is estimated that approximate 208 trees will be affected by the proposed public housing development while the trees to be affected by the school development is to be confirmed at the detailed design stage. The project departments (HD and EDB/ArchSD) will follow the Development Bureau Technical Circular (Works) No. 7/2015 on Tree Preservation to preserve existing trees as far as possible, integrate them with the proposed development, and/or compensate for their loss unavoidably affected by the developments. As far as possible, implementation of compensatory planting should be of a ratio not less than 1:1 in terms of number. If there were trees assessed as potentially registrable OVT, the Nomination and Registration Procedures for potentially registrable OVT will be followed with tree protection zone designated in accordance with the Environment, Transport and Works Bureau Technical Circular (Works) No. 29/2004. HD will adopt a minimum green coverage of 20% and will try to increase it to 30% as far as practicable. The local open space of the public housing development will be designed with a view to achieving a better visual integration with the adjoining green uses including the temporary community farm of Urban Oasis. For the school site, in considering its design and layout in future, due consideration will be given to minimizing the impact on the existing trees, particularly the larger one in the southern part of the site (**Plan H-12**).

Traffic and Transport

- 6.3.10 As indicated in the traffic impact assessment (TIA) conducted by HD and approved by Transport Department (TD) for the PRH development, all critical junctions in the surrounding areas will be operating within their capacities in design year 2027 except for three junctions, namely, Kai Cheung Road/Wang Kwong Road (a), Kai Cheung Road/Wang Chiu Road (b), and Shing Kai Road/Muk Chui Street (c) (**Plan H-10**). To cater for future traffic and public transport demands induced by increasing the development intensity of the Kai Tak Development, CEDD has proposed junction improvement schemes at some adjacent critical junctions, including junctions (a) and (b), which will be implemented before 2020 and 2018 respectively. To cater for the proposed

⁴ According to HKPSG, 1 m² of district open space and 1 m² of local open space should be provided per person.

PRH and school developments, further junction improvement schemes at (a) and (c) are proposed in HD's TIA. These junction improvement works will be completed by 2022 before completion of the Phase 1 of the PRH development scheduled for 2022/23. The CKR is tentatively scheduled for completion by 2025 and the programme for Trunk Road T2 will try to match with that for CKR project. With implementation of all the proposed junction improvement works, the TIA indicates that the local road network would be operating within its capacity at the morning and evening peak hours even if the CKR cannot be completed as scheduled.

- 6.3.11 In accordance with the TIA report, it is anticipated that, basing on the existing and predicted transport modes, the future residents of the proposed housing development may take various modes of transport services available in the vicinity to travel to/from different locations, including railway services (i.e. the site is located within walking distances from MTR Choi Hung Station, and the Kai Tak Station of Shatin to Central Link (SCL) (**Plan H-10**), which is scheduled for completion in 2019⁵), numerous bus routes and GMB services along Kwun Tong Road, WCR and Wang Kwong Road. Moreover, additional public transport services would be provided to serve Kai Tak and the Kowloon Bay area, including introduction of new bus routes under Bus Route Planning Programme 2017-2018. An additional lay-by for use by buses and minibuses would be provided outside the site along WCR (**Plan H-7a**). TD and public transport operators would closely monitor and arrange to strengthen the public transport services to cater for the passenger demand. With the introduction of new services and strengthening of existing services, public transport provision in the area is sufficient to cope with the additional population.

Vehicle Parking

- 6.3.12 The upper bound of the parking provision in the HKPSG has been adopted in order to provide sufficient parking facilities including private car, motorcycle and light goods vehicle for the future users of the WCR public housing development in a self-contained manner. Having obtaining permission from the Board, arrangement for letting of surplus monthly parking spaces of the nearby Choi Hung Estate to non-residents has also been made by HD to better utilize the parking spaces. This would indirectly help to meet the local parking demand. To ameliorate parking need in the area, Government has been adopting other means to provide parking spaces, e.g. identification of temporary car parks and on-street parking spaces where appropriate. As for illegal parking, the Police will take enforcement action as appropriate.

Pedestrian Connectivity

- 6.3.13 There are existing pedestrian connections to the adjacent MTR stations. Residents in the area could make use of a subway spanning across Kwun Tong Road to access MTR Choi Hung Station, or existing at-grade road-crossing facilities to access the future Kai Tak Station of the SCL for railway service to

⁵ The Tai Wai to Hung Hom Section of SCL including Kai Tak Station is targeted for commissioning in 2019. The full SCL with extension to Admiralty is scheduled for completion in 2021.

various locations (**Plan H-10**). The pedestrian assessment conducted by HD indicates that the subway as a major route to MTR Choi Hung Station will still operate with adequate level of service (LOS 'C'⁶) during peak hours in 2027 after the population intake of the PRH development. Upon the completion of SCL, the future residents of the proposed public housing development and nearby pedestrians could walk directly to the future Kai Tak Station instead of the Choi Hung Station. To facilitate connection to the surrounding areas, HD would provide covered walkway within the public housing development.

Air Ventilation, Visual and Environmental Impacts

- 6.3.14 Various technical assessments have been conducted including air ventilation assessment and visual appraisal to confirm that the proposed development at the site would not lead to adverse visual and air ventilation impacts to the surroundings. On air ventilation, good design features (25m wide non-building area in the eastern portion of the site, setback of the podium and residential towers from Kwun Tong Road by 20m and WCR by 5m, 15m separation between building blocks, at-grade ventilation passage, minimization of podium) (**Plans H-7a and 7b**) as recommended in the air ventilation assessment will be incorporated to maintain the ventilation corridors across the site and to the proposed school site. It is anticipated that the mitigation measures can help mitigate the potential adverse air ventilation impact on the surrounding areas.
- 6.3.15 As demonstrated in the visual appraisal (see photomontages in **Plans H-8a to 8g**), the proposed BHR of 120mPD for the development would not induce substantial visual impact to the surrounding areas and is not visually incompatible with the medium-rise/high-rise developments in the surrounding areas. Appropriate design measures will also be adopted to minimize the possible visual impacts on the surrounding developments such as 25m wide non-building area in the eastern portion of the PRH site, setback of the podium and residential towers from Kwun Tong Road by 20m and WCR by 5m respectively.
- 6.3.16 HD will prepare an environmental assessment study report for the proposed public housing development at detailed design stage to assess the potential noise impact and propose suitable noise mitigation measures to address the impact according to the HKPSG. As there should be practicable measures (e.g. setback, building disposition, single-aspect design, acoustic windows and architectural fins in the PRH development) which can be incorporated in the detailed design stage of the proposed public housing development, EPD advises that no insurmountable noise problem is anticipated. Also, while school is not considered as a noise emitter according to HKPSG, there are provisions under the Noise Control Ordinance to control the operational noise from school, which can also be mitigated by proper school management.
- 6.3.17 The air quality and noise impacts arising from the construction of the

⁶ LOS 'C' means sufficient space is available to select normal walking speeds and to bypass other pedestrians primarily in unidirectional stream. Where reverse direction or crossing movement exists, minor conflicts will occur, and speed and volume will be somewhat lower.

developments are under control of relevant pollution control ordinances and guidelines. The PRH development will be designed and constructed in accordance with the relevant pollution control ordinances and the HKPSG, and adopt pollution control measures/practice to minimise the construction noise and dust during construction works. EPD advises that adverse noise and dust impacts are not anticipated from the construction of the proposed PRH development.

- 6.3.18 For FCSC, HD had a meeting with them on 11.7.2017 and noted their concerns. HD is refining the detailed design of the proposed housing development with a view to addressing the possible concern and would closely monitor the performance of the contractor during construction stage to minimize the impacts on the FCSC.

Alternative Sites for Housing Development

- 6.3.19 The possibility of housing development at other sites should be considered separately. The East Kowloon Cultural Centre is already under construction, and Kowloon Bay Sports Ground or soccer pitches/cycling ground (Kowloon Bay Park) are major sports facilities serving the district. There is no justification to rezone these sites for housing development to replace the subject housing development.

Public Consultation

- 6.3.20 In taking forward the OZP amendment, the statutory and administrative procedures in consulting the public have been followed by PlanD and concerned Government departments, including the consultation with KTDC twice on the OZP amendments and attending a local forum. The views and suggestions raised by DC and locals, the minutes of the concerned meetings, submissions from the stakeholders and the responses of Government bureau/departments were relayed to MPC for consideration.

Other Views

- 6.3.21 Taking into account the land use context and the supporting technical assessments, the sites under Item A are considered suitable for housing development to meet the pressing need of the community. Regarding the use of the site for provision of subsidized sale flats, HD advises that the feasibility to provide subsidized sale flats in Phase 2 of the public housing development would be explored.

Items D1 and D2

- 6.3.22 Items D1 and D2 involve only technical amendment to rezone the concerned sites to reflect their existing uses as a drainage facility and road. The rezoning has no material impact on the provision of leisure area.

6.4 Responses to Representers' Proposals

Retention/Reprovisioning of CA's Premises

- 6.4.1 As mentioned in paragraphs 6.3.2 and 6.3.3 above, the Administration has been in liaison with CA for identification of suitable premises for reprovisioning of their premises on a temporary basis. The two options proposed by CA for retention of NHB have not been supported by technical assessments, and the site constraints and prescribed window/environmental requirements have not been fully considered. The in-situ retention of NHB will affect the proposed comprehensive housing and school development and is considered not appropriate.

Retain as Open Space

- 6.4.2 Since there is sufficient provision of open space in the area and there is no development programme for the “O” zone, it is considered appropriate to rezone the site for public housing and school developments to meet the need of the community. Retention of WCR sites for open space use is therefore not supported. For the retention of a portion of WCR sites for a rugby pitch, LCSD advises that some selected soccer pitches of Kwun Tong district (e.g. Kowloon Bay Sports Ground) are available for booking for playing rugby. There is no imminent need for an additional rugby pitch. LCSD would take into account factors such as the demand for such facilities, the usage of existing facilities, HKPSG, resource availability as well as the views of KTDC for planning and development of future leisure and sports facilities.

Building Height

- 6.4.3 The BHR of 120mPD for the WCR sites will form a stepped BH profile with the Richland Gardens (100mPD) to its southwest and the KTM site (140mPD) to its northeast. The proposed BHR of 120mPD would not induce substantial visual impact to the surrounding areas and is not visually incompatible with the medium-rise/high-rise developments in the surrounding areas.

6.5 Responses to Grounds of Comments

- 6.5.1 C1’s support to the proposed public housing development is noted. The views of **C2 to C39** regarding retention and reprovisioning of CA’s premises are similar to those of various representers. The responses in the above paragraphs are relevant.
- 6.5.2 As for the views of **C50 to C60** about the provision of BBI, PTI or loading/unloading bay for passengers in the area, 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-11**). A lay-by will be provided by setting back the development site of WCR for loading/unloading of passengers (**Plan H-7a**). Having reviewed the public transport services/facilities in the vicinity of WCR sites, the TIA conducted by HD indicates that an additional PTI to serve the proposed public housing development is not necessary given the comprehensive coverage of public transport services and the available different choices on transport modes. On the comment about provision of shopping facilities, the response in paragraph 6.3.6 above is relevant.

6.5.3 Regarding **C61**'s view on open space provision in the area, the responses in paragraph 6.3.8 above are relevant. On population growth, the Government is working on its territorial development strategy (Hong Kong 2030+) to set out long-term broad directions for land supply and town planning which has taken into account Hong Kong's future population. However, to address the imminent acute housing shortage problem, various measures to increase land supply in short to medium term including the subject rezoning are required.

6.5.4 Regarding **C62**'s concern on the impact on Urban Oasis, only a small portion (about 205m²) of the community farm of Urban Oasis (the portion of yellow area within the existing boundary of Urban Oasis in **Plan H-4**) will be affected by Phase 2 of the public housing development. The farm would not be significantly affected. Upon termination of the adjoining temporary depot of HyD, the possibility of extending the Urban Oasis will be explored to enhance the greening of the area. Apart from the existing elderly facilities in the district, in consultation with the Social Welfare Department, a residential care home for the elderly cum day care unit will be provided in the proposed housing development.

7. Departmental Consultation

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

- (a) Secretary for Labour and Welfare;
- (b) Secretary for Education;
- (c) Director of Housing;
- (d) Commissioner for Transport;
- (e) Director of Environmental Protection;
- (f) Director of Social Welfare;
- (g) Director of Leisure and Cultural Services;
- (h) Chief Architecture/Central Management Division 2, ArchSD;
- (i) Postmaster General;
- (j) District Officer/Kwun Tong, Home Affairs Department;
- (k) District Lands Officer/Kowloon East, Lands Department; and
- (l) Chief Town Planner/Urban Design and Landscape, PlanD.

8. Planning Department's Views

- 8.1 The supportive views of **R1 to R8** on Items A and B and **R9 (part)**'s support to Item D1 are noted.
- 8.2 Based on the assessment in paragraph 6 above and for the following reasons, PlanD does not support R9 (part) to R8459 and considers that the Plan should not be amended to meet the representations:

Items A and B

- (a) land suitable for housing development in Hong Kong is scarce and there is a need for optimizing the use of land available to meet the pressing demand for housing land. The proposed public housing development at the representation sites is compatible with the surrounding environment, and sustainable from traffic, environment, air ventilation and visual perspectives;
- (b) the New Horizons Building is neither a graded nor a proposed graded historic building. There is no strong justification for retention of the building, which would undermine the comprehensive planning and design of the proposed public housing and school developments at the representation sites (**R9, R13 to R1045, R1050 to R1283, R1285 to R8453**);
- (c) there is sufficient provision of open space in the area to meet the demand of the planned population. It is considered appropriate to rezone the representation sites for public housing and school developments to meet the needs of the community (**R10 to R831, R967, R971, R1001, R1071, R1077, R1085 to R1086 and R8455**);
- (d) the provision of major G/IC facilities in the area is generally sufficient. Part of the representation sites is reserved for development of a secondary school to meet the needs of the community, and appropriate G/IC facilities will be provided in the proposed public housing development to serve the local residents (**R9, R13 to R1154, R1157 to R1281, R1285 to R1293, R1309 to R1491, R1503 to R1734, R1737 to R1738, R1748 to R1754, R1757, R1762 to R1770, R1772 to R1780, R1782 to R1787, R1789 to R1798, R1804 to R1823, R1826 to R1829, R1831 to R1860, R1862 to R1897, R1899 to R1928, R1930 to R1937, R1939 to R1981, R1983 to R2008, R2010 to R2019, R2021 to R2029, R2032 to R2043, R2046 to R2048, R2051 to R2082, R2084 to R2094, R2096 to R2101, R2103 to R2119, R2121, R8454 and R8458**);
- (e) upon implementation of the recommended road improvement proposals and enhancement of public transport service, the proposed public housing development would not have adverse traffic impacts on the surrounding areas (**R10 to R11, R13 to R1156, R1158 to R1281, R1285 to R1287, R1898, R1915, R2090, R2106 to R2111, R2115 to R2116, R8454 and R8456**);
- (f) the statutory and administrative procedures in consulting the public on the zoning amendments have been duly followed. The views received were duly considered and responded to by the concerned Government

bureaux/departments in the process. The exhibition of the OZP for public inspection and the provisions for submission of representations and comments form part of the statutory consultation process under the Town Planning Ordinance (**R13 to R831, R984, R996, R999, R1001, R1018, R1020, R1051, R1052, R1055 to R1056, R1061, R1104 to R1106, R1126 and R1158 to R1281**); and

Items D1 and D2

- (g) Amendment Items D1 and D2 are to reflect the existing drainage facility and road use on the representation sites, and the rezoning will not materially affect the provision of open space in the area (**R11**).

9. Decision Sought

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

10. Attachments

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/K13/29
Annex III	Extract of Minutes of KTDC Meeting held on 9.5.2017
Annex IV	Provision of Open Space and Major GIC Facilities in Ngau Tau Kok and Kowloon Bay Planning Area
Annex V	Summary of Representations and Comments and Government Bureaux/Departments' Responses
Annex VI	CD-Rom of Group 1 representations and comments [TPB Members only]
Drawing H-1a to 1b	Indicative Layout Plans of the Alternative Proposals submitted by R9
Plan H-1	Comparison between Previous and Current Zonings
Plan H-2	Location Plan of the Representation Sites
Plan H-3	Site Plan of Representation Sites
Plan H-4	Existing Land Uses and Building Heights in the Surrounding Areas
Plan H-5	Aerial Photo of Representation Sites
Plans H-6a to 6b	Site Photos of Representation Sites
Plans H-7a	Conceptual Layout Plan of the Wang Chiu Road Sites

Plans H-7b	Conceptual Design Features and Mitigation Measures of the Wang Chiu Road Sites
Plans H-8a to 8g	Photomontages for the Proposed Public Housing Development
Plan H-9	Locations of Open Space and Major G/IC Facilities in the Surrounding Areas
Plan H-10	Major Pedestrian Routings around Wang Chiu Road Sites
Plan H-11	Proposed BBI at Prince Edward Road East
Plan H-12	Tree Survey for Wang Chiu Road Sites

NOVEMBER 2017

PLANNING DEPARTMENT