

**DRAFT URBAN RENEWAL AUTHORITY
SAI YEE STREET/FLOWER MARKET ROAD
DEVELOPMENT SCHEME PLAN NO. S/K3/URA5/1
CONSIDERATION OF REPRESENTATIONS NO. TPB/R/S/K3/URA5/1-R1 TO R767**

Subject of Representations/ Representation Site	Representers (No. TPB/R/S/K3/URA5/1-)
Draft Urban Renewal Authority Sai Yee Street/Flower Market Road Development Scheme Plan No. S/K3/URA5/1	<p>Total: 767</p> <p><u>Support (70)</u> R16: 羅家聰 (LAW Kar Chung, Eddie) (Chairman of District Fire Safety Committee, Yau Tsim Mong District) R40: 李思敏 (LI Sze Man) (Yau Tsim Mong District Council (YTMDC) Member) R41: 黃建新 (WONG Kin San) (YTMDC Member) R45: LAM Ka Fai, Francis (Member of the Land and Development Advisory Committee) R62: Hong Kong Institute of Architects (HKIA) R69: Urban Renewal Authority (URA)</p> <p>R2 to R15, R17, R18, R20, R21, R24, R26, R28, R31 to R35, R39, R42 to R44, R46 to R59, R63 to R68, R70 to R83: Individuals</p>
	<p><u>Partly Support and Partly Oppose / with Adverse Views / with Proposals (13)</u> R1, R19, R22, R23, R25, R27, R29, R30, R36 to R38, R60 and R61: Individuals</p>
	<p><u>Oppose / Provide Adverse Views (674)</u> R722: 花墟商戶業主大聯盟 R747: 太子大樓業主立案法團 (The Incorporated Owners of Prince Edward Building) R751: Designing Hong Kong R767: Tin Chuen Church</p> <p>R84 to R721, R723 to R729, R733, R734, R736 to R741, R743 to R745, R748, R750, R752 to R755, R757 and R760 to R766: Individuals</p>
	<p><u>Provide Views (10)</u> R730: MTR Corporation Limited (MTRCL)</p> <p>R731, R732, R735, R742, R746, R749, R756, R758 and R759: Individuals</p>

Note: The index of the representations is attached at **Annex II**. Soft copy of the submissions is sent to the Town Planning Board Members via electronic means; and is also available for public inspection at the Board's website at https://www.tpb.gov.hk/en/plan_making/S_K3_URA5_1.html and the Planning Enquiry Counters of the Planning Department in North Point and Sha Tin. A set of hard copy is deposited at the Board's Secretariat for Members' inspection.

1. **Introduction**

- 1.1 On 23.8.2024, the draft Urban Renewal Authority (URA) Sai Yee Street/Flower Market Road Development Scheme Plan (DSP) No. S/K3/URA5/1 (**Annex I**) was exhibited for public inspection under section 5 of the Town Planning Ordinance (the Ordinance).
- 1.2 During the two-month statutory exhibition period, a total of 767 valid representations were received. On 4.12.2024, the Town Planning Board (the Board) agreed by circulation to consider all these representations in one group.
- 1.3 This Paper is to provide the Board with information for consideration of the representations. The index of the representations is at **Annex II**. The representers have been invited to attend the meeting in accordance with section 6B(3) of the Ordinance.

2. **Background**

District Study for Yau Ma Tei and Mong Kok (YMDS)

- 2.1 YMDS, commissioned by URA, was completed in 2021. It mapped out a blueprint for restructuring and regenerating the old district to enhance land use efficiency and optimise redevelopment potential. A Master Urban Renewal Concept Plan (MRCP) has been formulated under YMDS to provide a blueprint for restructuring the old district and steering growth towards the five development nodes (DNs) identified in the Yau Ma Tei and Mong Kok (YM) areas (**Plan H-5**). Details regarding MRCP are set out in Section 4 of the YMDS Information Booklet¹. The proposed developments/redevelopments under the draft Sai Yee Street/Flower Market Road DSP cover the northeastern part of the Nullah Road Urban Waterway DN² (**Plan H-5**). To echo the 2023 Policy Address, the DSP is the first project to be implemented by URA to carry out restructuring and re-planning of land uses to realise the recommendations of the DN under the MRCP.

¹ The YMDS Information Booklet is available at <https://www.ura.org.hk/f/page/44/13214/Information%20Booklet.pdf>.

² Under the MRCP framework of YMDS, the Nullah Road Urban Waterway DN is mainly composed of (i) a new Waterway Park for public leisure and recreation with a new multi-purpose complex building accommodating existing and future uses under the "Single Site, Multiple Use" model; (ii) a mix of commercial cum residential developments along the Urban Waterway; (iii) pedestrian subways connecting between north and south sides of the Urban Waterway; and (iv) integrated character street, heritage preservation, open space, re-provision of Government, institution or community facilities and underground public vehicle park.

The Draft DSP

- 2.2 On 15.3.2024, URA submitted the draft Sai Yee Street/Flower Market Road DSP No. S/K3/URA5/A to the Board for consideration in accordance with section 25(5) of the URA Ordinance (URAO). The submission comprises the draft DSP with its Notes and Explanatory Statement (ES), as well as a planning report with technical assessments on traffic, environment, visual, air ventilation, drainage, sewerage and water supply aspects and the social impact assessment (SoIA) (Stage 1) report. On 30.4.2024, URA further submitted the SoIA (Stage 2) report to the Board.
- 2.3 On 26.7.2024, the Board considered and deemed the draft DSP together with its Notes as being suitable for publication under section 25(6) of URAO, and endorsed the revised ES as being suitable for public inspection together with the draft DSP. TPB Paper No. 10978 incorporating URA's submissions as mentioned in paragraph 2.2 is available at the Board's website³ and at the Board's Secretariat for Members' inspection, while the extract of the minutes of the said TPB meeting is at **Annex III**. Subsequently, the draft DSP was gazetted on 23.8.2024.
- 2.4 The DSP is located in the northeastern part of MK and is commonly known as the Flower Market precinct (**Plans H-1 to H-3**). It covers a gross site area (GSA) of about 29,315m², of which about 26,165m² (89%) is Government land while the remaining 3,150m² (11%) is private land. It comprises Site A and Site B, which are zoned "Other Specified Uses" annotated "Mixed Use (1)" ("OU(MU)1") and "OU(MU)2" on the DSP respectively. Site A is further divided into five linked sites, i.e. Sites A1 to A5, which are designated as Sub-areas (1) to (5) of the "OU(MU)1" zone respectively. Site B is divided into two sub-areas, which are designated as Sub-areas (1) and (2) of the "OU(MU)2" zone. The draft DSP has replaced the related areas of the approved Mong Kok (MK) Outline Zoning Plan (OZP) No. S/K3/38⁴ as delineated and described in the draft DSP.
- 2.5 The original development parameters of Site A and Site B on the MK OZP and their current development parameters on the DSP are summarised as follows:

	Site A				
	Site A1	Site A2	Site A3	Site A4	Site A5
GSA (m ²) (about)	3,570	268	123	233	251
	Total: 4,445				
Net Site Area (NSA) for Plot Ratio (PR) Calculation (m ²) (about) ⁽ⁱ⁾⁽ⁱⁱ⁾	2,640	239	109	202	198
	Total: 3,388				

³ TPB Paper No. 10978 and its attachments are available at the Board's website at https://www.tpb.gov.hk/en/meetings/TPB/Agenda/1323_tpb_agenda.html.

⁴ The draft MK OZP No. S/K3/37 was in force when the DSP was gazetted for public inspection on 23.8.2024. The relevant amendment items shown on the draft OZP were not related to the subject DSP area. Subsequently, the draft OZP was approved by the Chief Executive in Council on 29.10.2024 and renumbered as S/K3/38.

		Site A				
		Site A1	Site A2	Site A3	Site A4	Site A5
OZP	Original Zonings on OZP	“Residential (Group A)” (“R(A)”) (73%) ‘Road’ (27%)	“OU(MU)” (84%) ‘Road’ (16%)			
	Original PR Restriction on OZP	<u>“R(A)” zone:</u> <ul style="list-style-type: none">PR of 9.0 for a building that is partly domestic and partly non-domestic of which the domestic part should not exceed 8.5PR of 9.0 for a non-domestic building <u>“OU(MU)” zone:</u> <ul style="list-style-type: none">PR of 7.5 for a domestic building and PR of 9 for a building that is partly domestic and partly non-domesticPR of 9.0 for a non-domestic building				
	Original Building Height Restriction (BHR) on OZP	<ul style="list-style-type: none">“R(A)” zone: 20mPD⁽ⁱⁱⁱ⁾/115mPD“OU(MU)” zone: 115mPD				
Draft DSP (Annex I)	Zoning	“OU(MU)1”				
		Sub-area (1)	Sub-area (2)	Sub-area (3)	Sub-area (4)	Sub-area (5)
	Gross Floor Area (GFA) Restriction	<ul style="list-style-type: none">Maximum domestic GFA: 28,798m² (equivalent to domestic PR of 8.5)Total GFA: 30,492m² (equivalent to total PR of 9)				
	BHR	150mPD	1 storey			
	Other Restriction	Total at-grade public open space (POS): Not less than 800m ²				

Remarks

- (i) Subject to site survey and detailed design.
- (ii) Figures provided by URA. According to URA, NSA excludes surrounding public streets and pavements within the DSP area.
- (iii) As stipulated in the ES of the OZP, the southeastern portion of the previous “R(A)” zone (i.e. the current Site A1) was subject to BHR of 20mPD to assist the air ventilation performance in the inner part of the Kowloon Peninsula.

		Site B	
		Sub-area (1)	Sub-area (2)
Site Area (m ²) (about) ⁽ⁱ⁾		7,170	17,700
		Total: 24,870	
OZP	Original Zonings on OZP	“O” (65%), “G/IC” (22%), ‘Road’ (13%)	
	Original PR/GFA Restriction on OZP	Nil	
	Original BHR on OZP	“G/IC”: 2 storeys	

		Site B	
		Sub-area (1)	Sub-area (2)
Draft DSP (Annex I)	Zoning	“OU(MU)2”	
		Sub-area (1)	Sub-area (2)
	GFA Restriction	<ul style="list-style-type: none"> Maximum domestic GFA: 46,605m² (equivalent to domestic PR of 6.5) Total GFA: 64,530m² (equivalent to total PR of 9) 	<ul style="list-style-type: none"> Maximum domestic GFA: - Total GFA: 8,955m² ⁽ⁱⁱ⁾ (equivalent to total PR of about 0.5) Government, institution or community (GIC) facilities as required by the Government to be exempted from GFA calculation
	BHR	150mPD	30mPD
	Other Restrictions	<ul style="list-style-type: none"> Total POS: Not less than 16,200m², of which not less than 8,800m² shall be provided at-grade Provision of a public vehicle park (PVP) 	

Remarks

- (i) Subject to site survey and detailed design.
- (ii) The total GFA of 8,955m² comprises a non-domestic GFA of 8,850m² for retail uses and a non-domestic GFA of 105m² for the reprovisioning of an existing electricity substation.

3. Public Consultation

On 7.5.2024, URA consulted YTMDC on the DSP. YTMDC members generally welcomed the proposed redevelopment scheme, and their major concerns were related to the DSP boundary, potential impacts on the Flower Market, possible impacts of the construction works on the local traffic and provision of GIC facilities, as well as rehousing arrangements. The views of YTMDC members and URA’s responses, as well as the YTMDC meeting minutes, were incorporated in the aforesaid TPB Paper No. 10978. Representations from YTMDC members were received during the public exhibition period of the draft DSP.

4. The Representation Sites and their Surrounding Areas

4.1 The representation sites have the following characteristics:

Site A (Plans H-1 and H-2)

4.1.1 Site A1 is bounded by Sai Yee Street to the east, Prince Edward Road West to the south, Fa Yuen Street to the west and some existing composite commercial/residential (C/R) buildings to the north. It is mainly occupied by composite C/R buildings of 4 to 7 storeys which were completed between 1952 and 1957 with building ages ranging from 67 to 72 years, and a 10-storey C/R building completed in 1960 with building age of 64 years (**Plan H-6**). Sites A2 and A3 abut Yuen Ngai Street while Sites A4 and A5 abut Flower Market Road. They are all currently occupied by 4-storey tenement buildings built in 1948 with

building age of about 76 years and are surrounded by relatively younger composite buildings (**Plan H-6**), except Nos. 190-204 (even nos.), 210 and 212 Prince Edward Road West which are a cluster of Grade 2 historic buildings⁵ zoned “OU” annotated “Historic Buildings Preserved for Commercial and/or Cultural Uses” to the south of Sites A3 and A4 (**Plan H-4g**) and Nos. 38-48 Flower Market Road (even nos.)⁶ zoned “OU(MU)” to the east of Site A3.

Site B (Plans H-1 and H-2)

4.1.2 Site B is bounded by Boundary Street to the north, Sai Yee Street to the west, Flower Market Road to the south and MK Stadium to the east. It currently consists of a cluster of open spaces and GIC facilities⁷. The Boundary Street Sports Centre Nos. 1 and 2 therein were built in 1976 and 1987 respectively. Under the current setting, the existing open spaces are segregated from each other by fencing. Besides, Site B covers Flower Market Path with an existing decked nullah running underneath in a northeast to southwest direction. It is also surrounded by a number of GIC facilities and open spaces, including MK Stadium, Tai Hang Tung Recreational Ground, Fa Hui Park, Yuen Po Street Bird Garden and Chan’s Creative School.

4.2 The surrounding areas have the following characteristics (**Plans H-1 to H-3**, photos on **Plans H-4a to H-4h**, **Plan H-6** and **Plan H-7**):

- (a) area to the west of the DSP is mainly zoned “R(A)” subject to BHR of 115mPD dominated by medium to high-rise composite buildings with commercial uses on lower floors and residential use on upper floors and sporadically with recently redeveloped high-rise residential developments. Area to the further west along Nathan Road is an area zoned “Commercial” (“C”) with BHR of 160mPD;
- (b) area to the south and southwest of the DSP across Prince Edward Road West are mainly medium to high-rise composite buildings zoned “R(A)” and “OU(MU)” subject to BHR of 115mPD and community facilities zoned “G/IC” subject to BHR of 8 storeys. To the further south is a cluster of commercial developments, including Grand Century Place Towers 1 and 2, MOKO Mall and Royal Plaza Hotel zoned “OU (Railway Station Development)” subject to BHR of 92mPD, as well as the commercial development under construction at Sai Yee Street zoned “C(4)” subject to BHR of 320mPD;

⁵ The Grade 2 historic buildings were built in 1932 and have been revitalised by URA under the Prince Edward Road West/Yuen Ngai Street Project. They currently offer a mix of lifestyle shops and commercial spaces.

⁶ Nos. 38-48 Flower Market Road have a total site area of about 600m² and are occupied by six 4-storey buildings built in 1948.

⁷ The concerned Government facilities and leisure spaces include Boundary Street Recreation Ground, Boundary Street Sports Centre Nos. 1 and 2, Sai Yee Street Children’s Playground, Boundary Street Amenity Plot, Boundary Street Nursery, Sai Yee Street Public Toilet, Sai Yee Street (Flower Market Road) Refuse Collection Point and Boundary Street Sports Ground Substation.

- (c) area to the east and north of Site B is a cluster of GIC facilities and open spaces mentioned in paragraph 4.1.2 above. To the further north is a cluster of low to medium-rise residential developments in Yau Yat Tsuen zoned “Residential (Group C) 1” with existing BHs ranging from 29mPD to 32mPD; and
 - (d) MTR Prince Edward Station and Mong Kok East Station are located at about 150m to the west and about 270m to the south of the Site respectively.
- 4.3 The planning intention of the “OU(MU)” zone under the DSP is intended primarily for mixed non-industrial land uses. Flexibility for the development/redevelopment/conversion to residential uses, or a combination of various types of compatible uses including residential, commercial, GIC, cultural, recreational and entertainment uses, either vertically within a building or horizontally over a spatial area, is allowed to meet changing market and community needs. Physical segregation has to be provided between the residential and non-residential portions within a new/converted building to prevent nuisance caused by non-residential uses to the residents.
- 4.4 A notional scheme was prepared by URA (**Drawings H-2 to H-6**) to ascertain the technical feasibility supported by various assessments on environmental, traffic, drainage, sewerage, water supply, visual and air ventilation aspects. While the notional scheme is merely indicative in nature, the key development parameters and various design principles have been suitably stipulated in the Notes and ES of the DSP respectively, which should be duly respected in the future developments. The notional schemes of Site A and Site B are summarised as follows:

Notional Scheme of Site A

- 4.4.1 A “linked-site” approach is adopted for Sites A1 to A5, in which the development potential of the four small and isolated sub-sites (i.e. Sites A2 to A5) will be realised at Site A1 for residential development with retail and ancillary car parking facilities, while at-grade POS and single-storey retail facilities are proposed at Sites A2 to A5 (**Drawings H-2 and H-5**). The total PR of the linked-site comprising Sites A1 to A5 is 9, including domestic and non-domestic PRs of 7 and 2 respectively. The resultant domestic and total GFAs of Site A1 itself are 23,716m² and 30,292m² respectively, which are equivalent to domestic PR of 8.98 and total PR of 11.47. The detailed development parameters of the notional scheme at Site A are at **Annex IV**.

Notional Scheme of Site B

- 4.4.2 The development within Site B will adopt the “Single Site, Multiple Use” model. Sub-area (1) will be developed as a residential and commercial development with retail and GIC uses (**Drawings H-2 to H-4**). Sub-area (2) comprises a low-rise GIC complex abutting Boundary Street and Sai Yee Street with a reprovisioned 11-a-side football pitch (shown as ‘football/hockey field’ on some drawings) on the podium level and retail frontage on G/F, as well as a low-rise retail block abutting Flower

Market Road (**Drawings H-2 to H-4**). A PVP is also proposed within Site B to provide a total of 220 private car parking spaces and 10 loading/unloading (L/UL) spaces (**Drawings H-3 and H-4**). The detailed development parameters of the notional scheme at Site B are at **Annex IV**.

BH Profile

- 4.4.3 Under the notional scheme, Site A1 (i.e. Sub-area (1) of the “OU(MU)1” zone) has a BH of 150mPD and its southeastern corner (previously subject to BHR of 20mPD) is designated as POS upon redevelopment (**Drawings H-2 and H-3**). Sites A2 to A5 (i.e. Sub-areas (2) to (5) of the “OU(MU)1” zone) will be used for at-grade POS and/or single-storey retail facilities to enhance the vibrancy of the Flower Market area (**Drawings H-2 and H-5**). For Site B (i.e. “OU(MU)2” zone), while Sub-area (1) has a BH of 150mPD, the maximum BH of 30mPD at Sub-area (2) is intended to maintain the low-rise character of the Flower Market area along Sai Yee Street and Flower Market Road (**Annex I and Drawings H-3 and H-4**). Besides, a staggered BH profile has been adopted with taller tower blocks (i.e. T1 and T2 in Site A1, and T3 and T4 in Site B) of a maximum BH of 150mPD at the southwest stepping down to the lower tower block (i.e. T5 in Site B) of 130mPD at the northeast towards the low-rise residential area at Yau Yat Tsuen (**Drawings H-3 and H-4**).

Open Space and GIC Provision

- 4.4.4 A total of not less than 17,000m² POS is required to be provided within the DSP area for public enjoyment. Under the notional scheme, not less than 800m² at-grade POS will be provided within Site A, in which at-grade POS of about 500m² is proposed in Site A1 while not less than 300m² at-grade POSs within Sites A2 to A5 is proposed (**Drawings H-2 and H-5**). Additionally, not less than 16,200m² POS will be provided within Site B, in which not less than 8,800m² will be provided at-grade with the remaining 7,400m² POS proposed on the podium level of the low-rise GIC complex for the reprovisioning of the existing football pitch (**Drawings H-2 to H-4**).
- 4.4.5 According to the notional scheme, the at-grade POS in Site B comprises the Waterway Park, children’s play area and civic hub/activity node (**Drawing H-5**). The Waterway Park with a minimum width of 20m following the alignment of the existing decked nullah will constitute a main component of the proposed at-grade POS, serving as a major air ventilation and visual corridor in the area (**Drawings H-2, H-5 and H-11**). It connects Boundary Street to the northeast with Prince Edward Road West to the southwest through Site B and Site A1 (**Drawing H-5**), and further connects to the possible remaining part of the DN across Prince Edward Road West in the future (**Plan H-5**).
- 4.4.6 The proposed low-rise GIC complex at Site B will accommodate a GFA of about 20,000m², which is more than three times the GFA of the

existing provision (**Drawings H-2 to H-4**). The various GIC uses to be provided will include the reprovisioning of the existing affected GIC and sports/recreational facilities with upgraded standards, a permanent district health centre and new GIC facilities including Integrated Family Service Centre and 60-place Special Child Care Centre.

Pedestrian Connectivity and Walkability

- 4.4.7 To echo the “Park n’ Walk” concept under YMDS, an underground pedestrian connection is proposed to link up the proposed PVP at Site B and the southern part of the Waterway Park adjoining Flower Market Road to enhance accessibility (**Drawings H-2 and H-4 and Plan H-2**). This underground pedestrian connection will be implemented by URA as an integral part of the Scheme. The other potential linkages include (i) a pedestrian subway between Sites A1 and B across Sai Yee Street; (ii) a pedestrian subway from Site A1 towards Nathan Road/MTR Prince Edward Station to the southwest across Prince Edward Road West; and (iii) a pedestrian footbridge connecting Site B with Tai Hang Tung Recreation Ground to the north (**Drawings H-2 to H-4 and Plan H-2**). These potential linkages will be implemented through separate Government public works or URA’s revitalisation initiatives.
- 4.4.8 Taking the opportunity of redevelopment, separate Government public works or URA’s revitalisation initiatives are also proposed to rejuvenate the back lanes abutting Sites A2 to A5 as the ‘Third Street’ of the Flower Market precinct (**Drawings H-6 and H-14 and Plan H-4h**). They will be facelifted to provide an attractive and walkable pedestrian route in the area. Additionally, the space underneath the viaduct along Prince Edward Road West is proposed to be enhanced via facelifting, place-making and/or beautification works.

5. The Representations

5.1 Subject of Representations

- 5.1.1 During the two-month exhibition period, a total of 767 valid representations were received, including 70 supportive representations (**R2 to R18, R20, R21, R24, R26, R28, R31 to R35, R39 to R59 and R62 to R83**), 13 representations partly supporting and partly opposing/providing adverse views/providing proposals (**R1, R19, R22, R23, R25, R27, R29, R30, R36 to R38, R60 and R61**), 674 opposing representations/representations providing adverse views (**R84 to R729, R733, R734, R736 to R741, R743 to R745, R747, R748, R750 to R755, R757 and R760 to R767**) and 10 representations providing views (**R730 to R732, R735, R742, R746, R749, R756, R758 and R759**). The major grounds/views/proposals of the respective representations are indexed at **Annex V**.
- 5.1.2 The 70 supportive representations include one by URA (**R69**), two by YTMDC Members (**R40 and R41**), one by the Chairman of District Fire

Safety Committee (YTM District) (**R16**), one by a member of the Land and Development Advisory Committee (**R45**), one by HKIA (**R62**), and the remaining 64 by individuals.

5.1.3 The 13 representations partly supporting and partly opposing/providing adverse views/providing proposals were submitted by individuals.

5.1.4 The 674 opposing representations/representations providing adverse views include one by 花墟商户業主大聯盟 (**R722**), one by the Incorporated Owners of Prince Edward Building (**R747**), one by Designing Hong Kong (**R751**), one by Tin Chuen Church (**R767**) and the remaining 670 by individuals, among which 615 were submitted in three main types of standard formats.

5.1.5 The 10 representations providing views include one by MTRCL (**R730**) and the remaining nine by individuals.

5.1.6 The major grounds/views/proposals provided in the representations, as well as PlanD's responses in consultation with the relevant Government bureaux/departments (B/Ds), are summarised in paragraph 5.2 below.

5.2 Major Grounds, Views and Proposals of Representations and Corresponding Responses

Supportive Representations (83)

5.2.1 The major grounds/views of the 70 supportive representations (**R2** to **R18**, **R20**, **R21**, **R24**, **R26**, **R28**, **R31** to **R35**, **R39** to **R59** and **R62** to **R83**) and 13 partly supportive representations (**R1(part)**, **R19(part)**, **R22(part)**, **R23(part)**, **R25(part)**, **R27(part)**, **R29(part)**, **R30(part)**, **R36(part)** to **R38(part)**, **R60(part)** and **R61(part)**) in relation to the draft DSP are summarised below:

Major Grounds/Views	
(S1)	The proposed redevelopment within the DSP can address the issue of poor building conditions, including high building age, dilapidated facilities, poor structural safety and building management, thereby improving the living conditions. It is beneficial to the community for URA to commence smaller-scale projects with greater benefits to ensure its financial sustainability.
(S2)	The DSP will allow transferring the development potential of small and isolated sites (i.e. Sites A2 and A5) to Site A1, so that Sites A2 to A5 can be developed into POS and/or single-storey retail facilities, enhancing the vibrancy of the Flower Market area. This "linked-site" approach can optimise land resources, enhance commercial viability, and encourage private developers to apply the planning tool in other redevelopment projects.

(S3)	The DSP has adopted a “Single Site, Multiple Use” model to provide a multi-purpose GIC complex for reprovisioning and upgrading the affected GIC facilities, as well as offering new community facilities to meet local needs.
(S4)	The proposed redevelopment is compatible with the overall development intensity and urban design of the area, and can fully utilise land resources at the core location of MK East for increasing housing supply.
(S5)	Being the first project under YMDS, the proposed redevelopment can facilitate the development of the Flower Market area, YM district and the entire Kowloon West area. Its success will set a precedent case for other redevelopment projects in the district.
(S6)	The proposed redevelopment will add vitality to the area and maintain the unique character of the Flower Market, hence promoting its long-term development and attracting more tourists and visitors.
(S7)	The DSP has struck a balance between meeting the redevelopment needs and minimising the adverse impacts on the Flower Market.
(S8)	The concept of the Waterway Park is appreciated. By consolidating the currently segregated leisure spaces, the Waterway Park will provide more greenery and sizable open spaces for public enjoyment. The proposed arrangement for the nullah is supported as reopening it may adversely affect environmental hygiene. It will help improve the living environment and foster synergy with the surrounding areas including the Flower Market.
(S9)	The proposed pedestrian connections in the form of subway/footbridge will enhance the connectivity of the DSP area and its surroundings.
(S10)	The PVP can help alleviate the problem of insufficient parking spaces or illegal parking in the district, and address the issues of traffic congestion, vehicle-pedestrian conflicts and blockage of pedestrian walkways.
(S11)	The revitalisation of back lanes can improve the environmental hygiene of the Flower Market and provide a more comfortable pedestrian environment, thereby promoting the vitality of the area and supporting the sustainable development of the Flower Market.
(S12)	There are a number of suggestions on creating a better environment during the implementation stage. These include enhancing the operating environment of the Flower Market and the design of Waterway Park, improving the traffic and pedestrian environments and providing a more diverse range of community facilities. Some other suggestions include further enhancing the effectiveness of urban renewal, providing proper reprovisioning/relocation arrangements for the stakeholders affected by redevelopment, and minimising potential impacts as far as practicable.
Responses	
The supportive views at (S1) to (S12) above are noted.	

Representations Partly Opposing/with Adverse Views/with Proposals (13), Opposing Representations/Representations Providing Adverse Views (674), Representations Providing Views (10)

5.2.2 The major grounds/views/proposals of the 13 representations which are partly opposing/with adverse views/with proposals (**R1(part), R19(part), R22(part), R23(part), R25(part), R27(part), R29(part), R30(part), R36(part) to R38(part), R60(part) and R61(part)**), 674 opposing representations/representations providing adverse views (**R84 to R729, R733, R734, R736 to R741, R743 to R745, R747, R748, R750 to R755, R757 and R760 to R767**) and 10 representations providing views (**R730 to R732, R735, R742, R746, R749, R756, R758 and R759**) in relation to the draft DSP are summarised below:

5.2.3 *DSP Boundary and Rationale*

Major Grounds/Views/Proposals	
(A1)	It is unclear why the Flower Market area is selected for redevelopment, given that there are many other old urban areas in the territory.
(A2)	There is no clear standard for the site selection criteria under the DSP. The buildings (e.g. Prince Edward Building) and recreational facilities included in the DSP are in relatively good conditions and not in an urgent need for redevelopment. However, some other buildings in the nearby areas which have higher building age, poor facilities and management, as well as structural safety and potential fire hazard issues, have been excluded from the DSP.
(A3)	Several 4-storey buildings within the DSP area (including those in Site A5) demonstrate historical value, which should be conserved and/or developed into a tourist attraction.
(A4)	In pursuit of residential and commercial development, the DSP has encroached into a large amount of Government land, which accounts for about 90% of the entire DSP area and is currently occupied by a number of public facilities and open spaces. This will go against the public interest and the original planning intention.
(A5)	There is no complementary relationship between Site A and Site B under the DSP, hence failing to demonstrate the integrity of the proposal.
(A6)	To enhance the effectiveness of urban renewal, the DSP boundary should be further expanded or should include more aged buildings if not all the existing buildings in the area.
Proposals	
(A7)	<p>The following buildings should be incorporated into the DSP boundary due to poor building conditions, inconvenience to the elderly, ease of acquisition and/or the potential benefits for the overall planning of the area (Plan H-6):</p> <p>(i) 38-48 Flower Market Road (even nos.) and/or 4-8 Yuen Ngai Street (even nos.);</p>

	<p>(ii) 1-7 Yuen Po Street (odd nos.); and</p> <p>(iii) 206-208 Prince Edward Road West (even nos.).</p>
Responses	
<p>Responses to (A1) to (A6):</p> <p><u><i>The purpose of the DSP</i></u></p> <p>(a) The draft DSP is prepared to facilitate the first project of the Nullah Road Urban Waterway DN to be implemented by URA as part of the restructuring and re-planning of the area under MRCP of YMDS (Plan H-5). Under a holistic planning approach, the project is planned to serve as catalysts for urban regeneration and focal point for public to conglomerate, and to provide opportunities for open space and other public gains. While the DSP is only the first phase of the entire DN, the remaining phases will be progressively pursued in future.</p> <p><u><i>Redevelopment of Sites A1 to A5</i></u></p> <p>(b) The DSP will facilitate the redevelopment of various buildings with unsatisfactory conditions. According to URA, Sites A1 to A5 currently involve a total of 23 buildings aged from 64 to 76 years (Plan H-6), among which two buildings (9%) are of ‘varied’ condition; five (22%) are “three-nil” buildings without building management body; and 18 (78%) are without lift (Drawing H-1). For the Prince Edward Building within Site A1, the stairway leading to the lift lobby has posed difficulties for the physically disabled and the elderly. As the issue cannot be resolved by rehabilitation alone, URA considers that its redevelopment is considered necessary.</p> <p>(c) As advised by URA, the redevelopment potential of Sites A2 to A5 may be limited because of their small size ranging from about 110m² to 240m². The adoption of the “linked-site” approach will allow the development potential of these small and isolated sites (i.e. Sites A2 to A5) to be transferred to the larger and more strategically located site (i.e. Site A1). This approach will help optimise the development potential of Site A1, and free up Sites A2 to A5 for the provision of at-grade POS and low-rise retail facilities to enhance the ambience and vitality of the Flower Market area.</p> <p>(d) At present, all of the 4-storey buildings within the DSP area are not declared monuments or graded historic buildings. The Executive Secretary (Antiquities & Monuments) of the Antiquities and Monuments Office (AMO), Development Bureau (DEVB) has no adverse comment on the DSP from heritage conservation perspective.</p> <p><u><i>Redevelopment of Site B</i></u></p> <p>(e) Under the current notional scheme, Site B has adopted the “Single Site, Multiple Use” model for a comprehensive mixed-use development. To optimise land utilisation and maximise the development potential of the site, residential and hotel/office developments with retail and GIC uses are proposed within Sub-area (1) of Site B (Drawings H-2 to H-4). Sub-area (2) of Site B will comprise a multi-purpose GIC complex abutting Boundary Street and Sai Yee Street with retail frontage on G/F, as well as a low-rise</p>	

retail block abutting Flower Market Road (**Drawings H-2 to H-4**). The various GIC uses within Site B will include the reprovisioning and upgrading of the existing dilapidated GIC and sports/recreational facilities, and the provision of other new GIC facilities to meet community needs. The sizable at-grade POS at Site B, featuring the Waterway Park, children's play area and a civic hub/activity node, will help consolidate the existing segregated leisure spaces and provide more quality open spaces for public enjoyment (**Drawing H-5**). Opportunity is also taken to relocate the existing refuse collection point cum public toilet from junction of Sai Yee Street and Flower Market Road (**Plans H-2 and H-4e**) to the proposed GIC complex and improve the integration between MK Stadium entrance and the Waterway Park (**Drawing H-11**) to further strengthen the unique character and environment of Flower Market as a whole.

- (f) According to URA, it is planned to commence redevelopment at Site B first with retail shops on G/F of the GIC complex along Sai Yee Street and the Waterway Park for reprovisioning the affected retail businesses at Sites A1 to A5, thereby reducing the disturbance to the Flower Market operations and maintaining the local character of the area (**Drawings H-12 and H-13**). The proposed low-rise retail block at Site B will also help enhance street vibrancy and reinforce the retail character of the Flower Market area (**Drawing H-11**).

Responses to (A7):

- (g) As shown on **Plan H-6**, the buildings at 38-48 Flower Market Road (even nos.) share the same building age as those within Sites A2 to A5, i.e. completed in 1948. According to URA, it is considered viable for a separate single redevelopment of a reasonable scale on its own due to its larger site area of about 600m². Additionally, the buildings at 206-208 Prince Edward Road West (even nos.), 1-7 Yuen Po Street (odd nos.) and 4-8 Yuen Ngai Street (even nos.) were built in 1966, 1968 and 1972 respectively. These buildings are relatively younger and are equipped with lift as compared to those within Sites A2 to A5. As advised by URA, if these buildings are included in the DSP boundary, the number of flower shops affected will further increase, hence causing more disturbance to the Flower Market.
- (h) While URA has kick-started the first phase of DN, it is anticipated that the current DSP project will encourage the private sector to take part in the area's continued redevelopment, including those buildings currently not included in the DSP in view of their own redevelopment potential, building age or building conditions. Additionally, URA will continue to support the rehabilitation and preventive maintenance of the nearby buildings, ensuring the long-term vibrancy and sustainability of the Flower Market. As such, taking into account the above information and assessments, it is considered that the current DSP boundary has balanced the need to minimise adverse impacts to the Flower Market while redeveloping old buildings to achieve planning gains. The proposed expansion of DSP boundary is also considered not appropriate.

5.2.4 Local Culture and Flower Market Operations

Major Grounds/Views	
(B1)	The Flower Market has a long history and is an intangible cultural heritage (ICH) in Hong Kong, which should be well preserved. The proposed redevelopment will destroy the integrity and vibrant ambience of the Flower Market, resulting in a loss of its unique character. Replacing the traditional Flower Market with shopping malls will not favour the development of Hong Kong's tourism and economy.
(B2)	The proposed redevelopment, including the construction stage, will pose negative impacts to the flower, gardening and other related businesses, which will affect Hong Kong's retail industry.
(B3)	A likely outcome of the proposed redevelopment is gentrification, which will lead to an increase in rents and the displacement of local businesses. The livelihood of many retailers will be adversely affected.
(B4)	There are a number of suggestions related to the proposed redevelopment including the need to take into account local culture and the existing scale and operation of the Flower Market area, to provide suitable temporary/permanent relocation for the affected shops/Flower Market, and to improve/expand the operating environment of the Flower Market.
(B5)	The back lanes at the Flower Market are short and narrow with unpleasant environment and poor hygiene conditions. The proposed back lane revitalisation has neglected the operational needs of retail businesses, as the back lanes also serve as temporary storage areas and resting spaces for workers.
(B6)	The "dawn market" (天光墟) is one of the ICH in Hong Kong. The proposed redevelopment will destroy the business environment for goldfish vendors and other hawkers at Boundary Street and Flower Market Path, leading to the elimination of local culture.
Responses	
Responses to (B1) to (B6):	
<u><i>Facilitating the Development and Maintaining Local Character of the Flower Market</i></u>	
(a) The DSP will adopt an integrated and comprehensive approach with an aim to preserve and reinforce the distinctive characters of the Flower Market area. It is anticipated that the proposed redevelopment will improve the existing environment of the Flower Market while promoting its long-term development.	
(b) According to URA, there are currently about 120 flower shops in the Flower Market area with a total GFA of about 9,000m ² . The number of flower shops expected to be affected by the DSP is about 31 with a GFA of about 1,700m ² , hence accounting for only 19% of the total GFA of the existing flower shops. Besides, URA intends to initiate redevelopment of Site B at an earlier stage with the provision of new retail frontage along Sai Yee Street and Flower Market Road for reprovisioning the affected businesses within	

Site A. The total number of shop units to be provided within Sites A and B upon redevelopment would exceed the total number of displaced shops. Hence, it is envisaged that the overall impact of the proposed redevelopment on the Flower Market will be minimal although temporary disruption of business will be unavoidable. The DSP has struck a balance between the need for redevelopment and minimising the impact on the Flower Market.

- (c) According to URA's notional scheme, a number of proposals have been introduced to maintain and reinforce the unique character of the Flower Market. Ground floor retail shop frontage will be established at Site A1 and Site B, creating additional spaces for retail activities and facilitating the further expansion of the Flower Market precinct (**Drawings H-12 and H-13**). Setback along Sai Yee Street and Flower Market Road at Site B will promote pedestrian comfort and complement the ambience of the Flower Market (**Drawings H-11 and H-13**). Besides, under the "linked-site" approach, the development potential of the small and isolated sites (i.e. Sites A2 to A5) will be transferred to Site A1 so that Sites A2 to A5 can be developed into at-grade POS and/or single-storey retail blocks (**Drawings H-2 and H-5**). They will foster synergy with the business activities along Flower Market Road, thereby enhancing street vibrancy and the retail character of the area.
- (d) The back lanes adjoining Sites A2 to A5 are Government land for public access and currently face the issues of obstruction and unsatisfactory environmental hygiene (**Plans H-4h and H-6**). To address these problems, URA proposes revitalising these lanes as the "Third Street" of the Flower Market, creating an attractive and walkable route in the area (**Drawing H-14**). Under the notional scheme, Sites A2 and A3 are also designated for at-grade POS, which will help widen the access to the revitalised back lanes and enhance the overall welcoming atmosphere (**Drawings H-2 and H-5**). These initiatives will also provide an opportunity to open up the back façades of existing buildings to increase retail frontage. URA will act as a facilitator in liaising with the relevant B/Ds and stakeholders on the implementation details regarding the revitalisation of back lanes.
- (e) Additionally, to complement the character of the Flower Market, URA recommends themes of horticulture, floristry or gardening for the proposed on-street retail units at Site B. Drawing on the experience from other redevelopment projects, URA will organise a variety of indoor and outdoor florist-related and cultural-related activities in collaboration with the local community. This initiative will help preserve the local characters and promote the vibes of the Flower Market.
- (f) In accordance with the revised Urban Renewal Strategy published by DEVB, URA will assist in identifying suitable premises to enable affected shop operators to relocate and continue operation in the same district as far as practicable. Priority will be given to the affected florist operators to return to the proposed retail units within Site B upon completion of the redevelopment. URA will also consider offering rental concessions lower than the market rate. To support the continuation of business operations during the construction phase, URA will explore options to provide interim decanting locations near the Flower Market precinct, and continue to liaise

with the affected shop operators to understand their needs.

Preservation of the “Dawn Market” Culture

(g) The “dawn market” near the Flower Market is a mobile hawker bazaar which operates before 8 a.m. It is located mainly on the pedestrian pavement of Boundary Street outside the DSP boundary. Some mobile hawkers may also operate on Flower Market Path. URA will liaise with relevant B/Ds including the Food and Environmental Hygiene Department, if necessary, regarding the arrangements for these mobile hawkers in taking forward the DSP.

Flower Market and the “Dawn Market” as ICH

(h) As advised by the Leisure and Cultural Services Department (LCSD), the Flower Market and the “dawn market” are not listed in the ICH Inventory, and the ICH Office under LCSD is not processing or has not received any relevant application.

5.2.5 *Technical Aspects*

Major Grounds/Views/Proposal	
(C1)	The capacity of the road network in the area is already limited, in particular during festivals and with events at MK Stadium. The proposed redevelopment, including the construction stage, will further aggravate traffic congestion and/or illegal parking.
(C2)	The underground carpark is not necessary as it will be a waste of resources and/or cannot solve the existing traffic issues.
(C3)	The pedestrian environment along Flower Market Road will not be improved without widening works. The other proposed pedestrian improvement measures as separate initiatives may be easily ignored in future implementation.
(C4)	Measures to improve vehicular access arrangement of the underground PVP, increase provision of car parking and L/UL spaces including the use of automated parking system, widen roads and footpaths, promote walkability and further enhance the traffic and pedestrian environment are proposed.
(C5)	The proposed redevelopment, including the construction stage, will exert pressure on the existing environment. It will cause poor air quality, noise pollution, solid waste generation and/or flooding.
(C6)	The project proponent should conduct a more detailed railway noise impact assessment and implement the necessary noise mitigation measures. The TPB should impose such requirements through statutory plans and/or land administration documents.
Proposal	
(C7)	R92 proposes: (i) to include (i) the existing Prince Edward Road/Nullah Road Garden

	<p>and adjoining Government land (Area 1); (ii) the portion of Prince Edward Road West to the south of Sub-area (1) of “OU(MU)1” zone (Area 2); and (iii) the portion of Sai Yee Street to the east of Sub-area (1) of “OU(MU)1” zone (Area 3) into the DSP to enhance the pedestrian environment in the Flower Market area (Plan H-2); and</p> <p>(ii) to revise the Notes/ES of the DSP for Sub-area (1) of “OU(MU)1” zone accordingly to cover Areas 1 to 3 above, to provide a pedestrian subway connecting Sub-area (1) of “OU(MU)1” zone and Area 1 to MTR Prince Edward Station, and to provide an entrance plaza at Areas 2 and 3 integrated with the proposed POS in Sub-area (1) of “OU(MU)1” zone and the adjoining pavements.</p>
Responses	
<p>Responses to (C1) to (C6):</p> <p><i>Improvement of Traffic and Walkability</i></p> <p>(a) Under the current notional scheme, in addition to the ancillary parking provisions at both Sites A and B, an underground PVP with 220 private car parking spaces and 10 L/UL spaces is also proposed at Site B (Drawings H-3 and H-4). This underground PVP aims to alleviate issues related to double parking, traffic congestion and blocked pedestrian walkways in the Flower Market area caused by insufficient parking spaces and L/UL bays. It will be accessible via two vehicular accesses along Boundary Street, helping to divert traffic away from Sai Yee Street and Flower Market Road, thereby alleviating the “bottleneck” and traffic congestion at the Flower Market precinct (Drawing H-9). The actual provision and detailed design, including the location and access arrangement, as well as the number of car parking spaces and L/UL bays, will be formulated in consultation with relevant B/Ds, such as the Transport Department (TD), during the detailed design stage.</p> <p>(b) To promote the “Park n’ Walk” concept as outlined in YMDS, an underground pedestrian connection is proposed between the PVP and the southern part of the Waterway Park adjacent to Flower Market Road (Drawings H-2 and H-4 and Plan H-2). This connection aims to enhance connectivity and walkability, encouraging visitors and nearby shop operators to park their vehicles at the PVP and walk to Waterway Park, the Flower Market precinct and its surrounding areas. URA will implement this proposed underground pedestrian connection as an integral part of the DSP project.</p> <p>(c) Various separate Government public works/ URA’s revitalisation initiatives have been proposed to enhance walking experience and improve connectivity in the wider area. The space underneath the viaduct along Prince Edward Road West is proposed to be rejuvenated via facelifting, place-making and/or beautification works. Additionally, three potential pedestrian connections will be explored: including (i) a pedestrian subway between Sites A1 and B across Sai Yee Street; (ii) a pedestrian subway from Site A1 towards Nathan Road/ MTR Prince Edward Station to the southwest across Prince Edward Road West; and (iii) a pedestrian footbridge connecting Site B with Tai Hang</p>	

Tung Recreation Ground to the north (**Drawings H-2 and H-4 and Plan H-2**). The implementation of these proposals will be subject to technical feasibility, detailed design and further liaison with the relevant B/Ds.

Traffic Impact

- (d) The Traffic Impact Assessment (TIA) conducted by URA for the DSP confirmed that all of the critical junctions would operate within their design capacity, and that the proposed vehicular access arrangements are technically feasible. With the implementation of the proposed improvement works by URA, such as widening of two signalised crossings at Prince Edward Road West and Sai Yee Street and footpath widening along the southern side of Playing Field Road (between Tung Choi Street and Sai Yee Street), there would be no adverse impact to the local traffic network and pedestrian environment (**Drawing H-10**). Commissioner for Transport (C for T) has no adverse comment on the TIA and no objection to the DSP. The implementation of the proposed pedestrian improvement works will be subject to further liaison with the relevant B/Ds including TD and the Highways Department (HyD).
- (e) For any road works or road closure arising from construction works, a construction TIA and temporary traffic arrangement plans should be submitted to the relevant B/Ds, including TD and the Hong Kong Police Force, for further assessment in the implementation stage.

Environmental and Drainage Impact

- (f) The Environmental Assessment (EA) conducted by URA has concluded that no adverse impacts on air quality, noise impact and waste management are anticipated. The Director of Environmental Protection (DEP) has no objection to the DSP and advises that URA should submit an Air Quality Impact Assessment and a Noise Impact Assessment (NIA) during the detailed design stage to demonstrate the acceptability of the proposed development from environmental perspectives and identify necessary mitigation measures as necessary. The NIA will also include assessment on railway noise. Relevant requirements on the technical assessments have been stipulated in the ES of the DSP and will be included in the land grant conditions.
- (g) The environmental impacts during the construction stage will be subject to statutory control under the relevant pollution control ordinances, including the Air Pollution Control Ordinance (Cap. 311) and the Noise Control Ordinance (Cap. 400).
- (h) URA's Drainage and Sewerage Impact Assessment also demonstrated that no insurmountable drainage issues would be anticipated. The Chief Engineer/Mainland South, Drainage Services Department (CE/MS, DSD) has no adverse comments on the proposal. According to URA, resilience studies have been conducted in recent years to address climate change concerns in redevelopment projects, in particular those near coastal areas. Measures related to drainage, electrical and mechanical facilities, as well as waterproof system for the basements of the proposed development, will be designed to meet modern standards. Additionally, compliance with relevant guidelines for stormwater drainage will be required for the proposed development.

Responses to (C7):

- (i) Regarding **R92**'s proposal, the potential pedestrian connections and proposed pedestrian improvement works to be implemented by URA or under separate Government public works/URA's revitalisation initiatives have been mentioned in responses (b) to (d) above. As such, **R92**'s proposal to include the concerned Areas 1 to 3 into the DSP for improvement of pedestrian environment is considered not necessary.

5.2.6 *Urban Design and Landscape*

Major Grounds/Views	
(D1)	The proposed design of the Waterway Park with at-grade water features will deviate from the original proposal under YMDS, is uncreative and impractical and/or will reduce the POS area.
(D2)	The proposed redevelopment with a maximum BH of 150mPD will lead to a further increase in development intensity in the district, which will aggravate the urban heat island effect and disrupt the low-rise character of the Flower Market area.
(D3)	The proposed high-rise buildings and GIC complex will adversely affect the visual amenity of the Flower Market area, hamper air ventilation in the area and/or reduce natural light penetration at the open spaces.
(D4)	The existing trees along Flower Market Path should be well preserved, and their removal will bring negative impacts to the ecosystem and microclimate of the area.
(D5)	There are concerns regarding the accuracy of the tree survey and/or the greening ratio upon redevelopment.
(D6)	There are a number of suggestions which include reducing the development intensity, enhancing the design of the GIC complex/ Waterway Park, re-creating a river, improving pedestrian circulation within the Waterway Park, providing more tree shades and developing a flower viewing hotspot.
Responses	
Responses to (D1) to (D6):	
<u>Waterway Park</u>	
(a) According to the recommendations of YMDS for the DN in MK East, a Waterway Park is proposed to serve as a new "blue-green feature" to reconnect the segregated spaces and rejuvenate the character of MK (Plan H-5). URA has explored the possibilities of re-opening the existing nullah between Boundary Street and Flower Market Road, which was covered in 2010 to eliminate odour and improve hygiene condition. In collaboration with various Government departments including EPD and DSD, URA has conducted various tests which reveal that the water in the decked nullah contains large amounts of pollutants, microbes as well as strong	

odour-causing chemicals. URA considers that as a prudent and practical solution to safeguard public hygiene and address environmental safety concerns while taking forward the distinctive waterway landscape concept advocated under YMDS, the proposed Waterway Park will provide appropriate water features above and/or along the decked nullah alignment as far as practicable to recall the memory and local characters of the nullah. The public could also reach the water features for leisure and recreation, hence promoting the water-friendly culture. The design of the Waterway Park will be subject to agreement with the relevant B/Ds including LCSD.

- (b) As specified under the ES of DSP, the design of the proposed Waterway Park should not preclude the possibility of re-opening the decked nullah, which remains a long-term vision of the DSP and could be further explored subject to improvement of the water quality and proper integration with the wider drainage network to control water flow and prevent flooding risks.

Development Intensity and Visual, Air Ventilation and Natural Light Impacts

- (c) The BHR of 150mPD at Site A1 is necessary for accommodating the transferred development potential from Sites A2 to A5. A higher BHR will also allow design flexibility for a smaller overall site coverage, and thus, release more space for the provision of not less than 9,600m² at-grade POS including the Waterway Park as well as the reprovisioning of the football pitch. Besides, under URA's notional scheme, a staggered BH profile has been adopted with taller tower blocks of 150mPD positioned in the southwest (i.e. T1 and T2 in Site A1, and T3 and T4 in Site B) and a lower tower block of 130mPD (i.e. T5 in Site B) positioned in the northeast (**Drawings H-3 and H-4**). This design aims to respect the downward stepping profile from MK East area towards Yau Yat Tsuen in the northeast. The high-rise buildings at Site B will maintain a minimum distance of 60m from the existing residential buildings along Sai Yee Street and 40m from those along Flower Market Road. Additionally, the BHR of 30mPD for the proposed GIC complex at Sub-area (2) of Site B will help preserve the low-rise character of the area (**Drawing H-3**). Other design measures such as building setback and separation as set out in the Sustainable Building Design Guidelines (SBDG), will also be adopted as appropriate.

- (d) Considering the wider context of the MK area, where there is a BHR of 160mPD along Nathan Road, the proposed BHs under the DSP are considered not incompatible with the surrounding areas (**Plan H-1**). Chief Town Planner/ Urban Design and Landscape, Planning Department (CTP/UD&L, PlanD) noted that while the proposed development would inevitably obstruct some sky views and reduce the visual openness currently offered by the low-rise cluster, it would not encroach into the 20% building free zone (BFZ) of the ridgelines. Therefore, the integrity of the ridgelines at Lion Rock and Beacon Hill would be preserved. The Chief Architect/Advisory and Statutory Compliance, Architectural Services Department (CA/ASC, ArchSD) has no adverse comment on the proposed BHs from visual impact perspective. The building layout and disposition of the proposed development will be subject to further detailed design.

- (e) An Air Ventilation Assessment – Initial Study (AVA-IS) has been conducted

to compare the pedestrian-level air ventilation performance of the baseline scheme (mix of OZP-compliant condition and existing condition) and the notional scheme. The notional scheme incorporates several major wind enhancement features, including (i) setback at the southeast corner of Site A1; (ii) a 20m-wide northeast-southwest air path along the existing Flower Market Path of Site B; (iii) permeable elements at ground floor beneath the podium and residential towers of Site B; and (iv) a 15m separation between the residential tower(s) and hotel/office tower of Site B (**Drawings H-2 and H-3**). Simulation results indicate that despite localised impacts along Tung Choi Street between Boundary Street and Prince Edward Road West under annual conditions, the notional scheme performs significantly better than the baseline scheme in both annual and summer conditions. CTP/UD&L, PlanD has no adverse comment on the submitted AVA-IS. It is anticipated that the above-mentioned urban design measures will positively contribute to the urban microclimate and foster a more liveable and comfortable living environment.

- (f) There is no requirement for conducting daylight assessment under the Hong Kong Planning Standards and Guidelines (HKPSG) and other relevant regulations/ guidelines. Nevertheless, relevant requirements on building separation under SBDG will be complied with. URA has also proposed various design measures regarding building separation as mentioned in responses (c) and (e) above. Adverse impacts on natural light penetration at the open spaces are not anticipated.

Tree Preservation and Landscaping

- (g) According to the submitted tree survey report and preliminary tree preservation proposal, there are 212 existing trees located within or straddling the boundaries of the DSP, including three Old and Valuable Trees (OVTs), four Stone Wall Trees (SWTs) and two mature trees (**Drawing H-7**). The current proposal plans to retain 102 trees, including all the OVTs, SWTs and mature trees. The remaining 110 existing trees that conflict with the proposed building footprints will be transplanted or felled (**Drawing H-8**). A compensatory tree planting ratio of 1:1 in terms of quantity is proposed. URA has indicated that adequate space will be reserved within the DSP area for tree compensation and transplantation. A detailed Tree Preservation and Removal Proposal will be developed to identify the proposed locations for transplanted trees and compensatory trees during the development stage subject to approval by the relevant B/Ds. Compliance with the relevant guidelines and technical circulars promulgated by DEVB concerning tree preservation is also required. Director of Leisure and Cultural Services (DLCS) and CTP/UD&L, PlanD have no adverse comment on the submitted tree survey and no objection to the DSP from tree preservation perspective.
- (h) As for the proposed greening ratio, the proposed development will follow SBDG for the provision of greenery as far as practicable. The detailed landscape design and layout arrangement will be subject to further liaison with the relevant B/Ds.
- (i) URA plans to develop the Waterway Park as a flower appreciation hotspot

for public enjoyment. By adopting a colourful landscape design theme, the Waterway Park will feature flowering trees and shrubs, along with appropriate soft and hard landscape to create an attractive environment for flower viewing activities. Noting that greening is a key design element, URA will strive to achieve a balance between providing greenery and fulfilling the functions of the Waterway Park as a connecting and gathering space.

5.2.7 Provision of Open Spaces and GIC Facilities

Major Grounds/Views	
(E1)	While there are various issues regarding the existing open spaces and GIC facilities, the need for redevelopment cannot be justified.
(E2)	There are various concerns with regard to the provision of open spaces, including reduction in open spaces for public enjoyment, no provision of local open space within the proposed redevelopment, inadequate POS provision within Site A (i.e. 800m ²), unsatisfactory POS arrangement at Sites A2 to A5, no net increase in the overall POS provision under the DSP, low accessibility of the reprovisioned football pitch on the podium, and the need to retain Boundary Street Nursery and increase POS provision.
(E3)	The proposed redevelopment will exert pressure on the provision of GIC facilities and lead to the suspension of highly-utilised sports facilities for a long period of time, adversely affecting people's quality of life.
(E4)	Tin Chuen Church ⁸ (Plans H-4b and H-6) has been established in the Flower Market area for over 80 years. The continued operation of the church and its provision of social services to the community may be affected by the proposed redevelopment.
(E5)	There are a number of suggestions including the suitable arrangement and provision of community facilities such as library in the area to meet local needs.
Responses	
Responses to (E1) and (E2):	
(a) Regarding the "linked-site" approach for Site A and the rationale for redeveloping the existing open spaces and GIC facilities, responses (c) and (e) of paragraph 5.2.3 above are relevant.	
(b) The DSP will provide a total of not less than 17,000m ² POS for public enjoyment. Site A will provide not less than 800m ² at-grade POS, while the adjacent Site B will provide 16,200m ² POS, of which 8,800m ² will be at-grade (Drawing H-2). In comparison to the existing POS affected by the DSP (i.e. 15,815m ²), this represents a net increase in POS of about 1,185m ² .	

⁸ Tin Chuen Church is located on G/F of 225-227 Sai Yee Street, which falls within Site A1 of the DSP area. The buildings were completed in 1952 with an age of 72 years. According to URA, they are "three-nil" buildings without building management body and are without lift (**Drawing H-1**).

Consequently, the overall POS area will not be reduced following redevelopment, and DLCS has no adverse comment on the proposal.

- (c) According to the Scheme, the additional POS (i.e. about 1,185m² as aforementioned) is proposed for the reprovisioning of the existing Prince Edward Road/Nullah Road Garden and Nullah Road Sitting-out Area in the future development of the DN. Under YMDS, it is recommended that at least 30% of the site area will be reserved for open spaces within each DN to enhance the quality POS. As the DSP is only the first phase of the DN and the remaining phases will be progressively pursued, the overall provision of open spaces in the wider area is expected to increase. Considering the DSP itself, the total POS provision (i.e. not less than 17,000m²) has accounted for about 58% of the entire site area.
- (d) Regarding the reprovisioned football pitch on the podium of the GIC complex, it will be accessible to the public via the GIC complex as indicated in the notional scheme. Details concerning the design, access arrangements, management matters and other related issues will be developed during the detailed design stage, in consultation with LCSD and other relevant B/Ds. Moreover, a minimum of 1m² per person of local open space will be provided within the proposed redevelopment in accordance with HKPSG.
- (e) According to URA, it is currently proposed to relocate the existing Boundary Street Nursery for the development of the Waterway Park. The reprovisioning site will be subject to further liaison with the relevant B/Ds including LCSD.

Responses to (E3) to (E5):

- (f) The proposed low-rise GIC complex at Site B will have a GFA of about 20,000m², which will include the reprovisioning of the existing affected GIC and sports/recreational facilities with upgraded standards, a permanent district health centre and new GIC facilities including Integrated Family Service Centre and 60-place Special Child Care Centre (**Drawings H-2 to H-4**). This represents more than three times the GFA of the existing provision for meeting community needs. URA will continue to liaise with the relevant B/Ds to finalise the GIC provision. The actual provision of GIC facilities will be subject to timely confirmation of usage, funding, operational needs and detailed design requirements from relevant B/Ds.
- (g) To minimise inconvenience to the public, URA is liaising with LCSD on the transitional arrangements for the affected sports facilities during the construction stage, including the provision of an alternative sports venue. Additionally, to reduce the disturbance to the availability of GIC facilities, the possibility of a phased development approach will be explored. The detailed programme and phasing arrangements are subject to acquisition progress, land grant processing, schedule of GIC reprovisioning and other relevant factors.
- (h) According to URA, the church affected by the redevelopment may choose to purchase or lease a premises within the area to continue its operation with

compensation from URA. URA will also proactively assist in identifying a suitable premises in the nearby area for the church's relocation upon request.

5.2.8 *Public Consultation*

Major Grounds/Views	
(F1)	During the public survey conducted by URA, the stakeholders were not fully informed of the details regarding the implementation of the DSP. The Social Impact Assessment may not have accurately reflected public opinion.
(F2)	The public consultation was not genuine and extensive. The relevant stakeholders should be adequately and properly consulted.
Responses	
Responses to (F1) and (F2):	
<p>(a) URA consulted YTMDC on 7.5.2024 and held meetings with the major stakeholders in the area, including Hong Kong Wholesale Florist Association, the affected religious organization, as well as relevant professional institutes and scholars in March to May 2024. URA will continue engaging in dialogue with stakeholders to address their concerns, and will integrate community participation with the 4R strategies to promote the sustainable development of the Flower Market.</p> <p>(b) The draft DSP was exhibited for public inspection on 23.8.2024 under the Ordinance. The exhibition of the DSP for public inspection and the provision for submitting representations are integral parts of the statutory consultation process. The representers were also invited to attend the hearing and make oral submissions in accordance with the Ordinance.</p> <p>(c) According to URA, various forms of public consultation were conducted both before and after commencement of the DSP to understand the concerns, needs and visions of the affected stakeholders and the community. These consultations included two rounds of survey targeting florist operators and customers at the Flower Market area, public briefings, as well as the Project Engagement Programme (「夥伴同行」探訪計劃). Additionally, URA organised a series of community participation initiatives, such as interviews with the local stakeholders on the implementation programme of the DSP.</p>	

5.2.9 *Compensation and Rehousing/Relocation*

Major Grounds/Views	
(G1)	Adequate compensation, relocation within the same district and/or proper relocation of the affected residents and shop operators before redevelopment is required.

(G2)	URA should provide suitable reprovisioning arrangements for Tin Chuen Church during the transitional period and after redevelopment, enabling it to maintain its operations within the local community. The reprovisioning site should have a minimum area of about 670m ² , be situated on the ground floor within the Flower Market area, and include barrier-free facilities and an L/UL bay outside the premises.
(G3)	URA should review and improve the policy of relocation within the same district.
Responses	
Responses to (G1) to (G3):	
Compensation and rehousing/relocation arrangements fall outside the scope of the DSP and the jurisdiction of the Board. These matters will be addressed separately by URA in accordance with prevailing policies and arrangements.	

5.2.10 Implementation Programme and Others

Major Grounds/Views	
(H1)	The proposed redevelopment should be carried out in phases to minimise the adverse impacts.
(H2)	There is no urgent need for redevelopment due to the current socio-economic conditions or the status quo should be maintained. The resources committed in redevelopment can be put to better use.
(H3)	The structural safety of other adjacent buildings may be affected due to building demolition and/or the issue of unauthorised building structures should be accorded priority.
(H4)	There are a number of suggestions which include incorporating a requirement for the submission of an urban design and conservation proposal, promoting the Flower Market area and enhancing its attractiveness, providing assistance to support small-scale businesses, as well as adopting an innovative approach to urban renewal.
Responses	
Responses to (H1):	
(a) As stipulated in the ES of the DSP, to maximise the planning gains as early as possible and to minimise the disturbance to the services of existing GIC facilities, implementation of the development is proposed to be carried out in phases. The detailed programme and phasing arrangements are subject to acquisition progress, land grant processing, schedule of GIC reprovisioning and other relevant factors.	
Responses to (H2):	
(b) Regarding the rationale of the DSP and the potential benefits brought by the redevelopment, paragraph 5.2.3 above is relevant.	

Responses to (H3):

- (c) The Building (Demolition Works) Regulations and other relevant codes of practice should be complied with for the demolition of buildings. Additionally, the Buildings Department (BD) has been taking enforcement actions against unauthorised building works in accordance with the Buildings Ordinance.

Responses to (H4):

- (d) URA submitted various technical assessments together with a Social Impact Assessment (Stages 1 and 2) to demonstrate the acceptability of the proposed redevelopment, and the relevant B/Ds have no objection to the DSP. Regarding the proposed measures for enhancing the vibrancy of the Flower Market area and assistance to the affected business operators, paragraph 5.2.4 above is relevant. Additionally, URA will incorporate smart city and place-making initiatives in the planning of YM areas to realise the visions as advocated in YMDS, with a view to enhancing the effectiveness of urban renewal.

6. Departmental Consultation

6.1 The following B/Ds have been consulted and their responses have been incorporated in the above paragraphs, where appropriate:

- (a) Executive Secretary (Antiquities & Monuments) of AMO, DEVB;
- (b) C for T;
- (c) CE/MS, DSD;
- (d) Chief Building Surveyor/Kowloon, BD;
- (e) CA/ASC, ArchSD;
- (f) CTP/UD&L;
- (g) DEP;
- (h) DLCS; and
- (i) Commissioner of Police.

6.2 The following B/Ds have been consulted and they have no comment on the representations:

- (a) Secretary for Culture, Sports and Tourism;
- (b) Secretary for Development;
- (c) District Lands Officer/Kowloon West, Lands Department;
- (d) Chief Estate Surveyor/Urban Renewal, Lands Department (CES/UR, LandsD);
- (e) Project Manager (South), Civil Engineering and Development Department;
- (f) Chief Highway Engineer/Kowloon, HyD;
- (g) Chief Engineer/Construction, Water Supplies Department;
- (h) Director of Social Welfare;
- (i) Director of Fire Services;
- (j) Director of Food and Environmental Hygiene; and

(k) District Officer (Yau Tsim Mong), Home Affairs Department.

7. Planning Department's Views

- 7.1 The supportive views of **R1(part), R2 to R18, R19(part), R20, R21, R22(part), R23(part), R24, R25(part), R26, R27(part), R28, R29(part), R30(part), R31 to R35, R36(part) to R38(part), R39 to R59, R60(part), R61(part)** and **R62 to R83**, and views provided by **R730 to R732, R735, R742, R746, R749, R756, R758 and R759** are noted.
- 7.2 Based on the assessments in paragraphs 5.2.3 to 5.2.10 above, PlanD does not support the representations of **R1(part), R19(part), R22(part), R23(part), R25(part), R27(part), R29(part), R30(part), R36(part) to R38(part), R60(part), R61(part), R84 to R729, R733, R734, R736 to R741, R743 to R745, R747, R748, R750 to R755, R757 and R760 to R767**, and considers that the draft DSP should not be amended to meet the representations for the following reasons:
- (a) the DSP is prepared to facilitate the first project of the Nullah Road Urban Waterway DN to be implemented by URA as part of the restructuring and re-planning of the area under MRCP of YMDS. The DSP has included Sites A1 to A5 involving various aged buildings with unsatisfactory conditions to facilitate their redevelopment. The “linked-site” approach is adopted in Sites A1 to A5 to allow for the provision of at-grade POS and low-rise retail facilities therein while maximising the development potential. Redevelopment of Site B has adopted the “Single Site, Multiple Use” model for a mixed comprehensive development to optimise its development potential, to provide a sizable Waterway Park, and to reprovision the existing GIC facilities with upgraded standards along with additional facilities. The DSP is considered appropriate to facilitate the comprehensive redevelopment of the concerned areas. There is no strong justification to revise the DSP boundary;
 - (b) a number of measures have been proposed under the DSP project to preserve and enhance the distinctive character of the Flower Market, including the retail shops along Sai Yee Street and Flower Market Road. The DSP project has struck a balance between meeting redevelopment needs and minimising disruption to the Flower Market operation;
 - (c) to realise the “Park n’ Walk” concept under YMDS, an underground PVP will be provided within Site B with underground connection to the southern part of the Waterway Park and other improvements to pedestrian facilities as an integral part of the DSP for improving walkability and connectivity. Other separate initiatives including beautification works and potential pedestrian connections are also proposed for further exploration to upgrade the pedestrian environment and enhance connectivity with the surroundings;
 - (d) the currently proposed design for the Waterway Park is a prudent and practical solution, taking into account environmental hygiene and the vision of realising the waterway landscape concept under YMDS. As specified

under the ES of DSP, the design of the proposed Waterway Park should not preclude the possibility of re-opening the decked nullah, which remains a long-term vision of the DSP;

- (e) with the adoption of various urban design proposals including staggered building heights and wind enhancement measures, adverse visual and air ventilation impacts are not anticipated. All the OVTs, SWTs and mature trees will be retained, and relevant Government guidelines and technical circulars will be complied with for tree preservation and compensation;
- (f) as compared with the existing POS affected by the DSP, there is a net increase in POS of about 1,185m² under the DSP. As for the proposed GIC facilities, their total GFA is more than three times the GFA of the existing provision for meeting community needs. URA will explore ways in liaison with the relevant B/Ds to minimise adverse impacts on the provision of GIC facilities;
- (g) relevant technical assessments have been submitted by URA to demonstrate the technical feasibility of the proposed development, and no insurmountable problems from traffic, environmental and drainage perspectives are anticipated. Relevant legislations, government requirements and guidelines will be observed by URA during implementation; and
- (h) the statutory and administrative procedures in consulting the public on the DSP have been duly followed. While compensation and rehousing/relocation arrangements fall outside the scope of the DSP and the jurisdictions of the Board, URA will continue to engage local stakeholders and residents on the redevelopment, and will provide necessary assistance to the affected shop operators and community institutions as appropriate.

8. Decision Sought

- 8.1 The Board is invited to give consideration to the representations taking into consideration the points raised in the hearing session, and decide whether to propose/not to propose any amendment to the draft DSP to meet/partially meet the representations.
- 8.2 Should the Board decide that no amendment should be made to the draft DSP to meet the representations, Members are also invited to agree that the draft DSP, together with its Notes and updated ES, are suitable for submission under section 8 of the Ordinance to the Chief Executive in Council for approval.

9. Attachments

Annex I	Draft DSP No. S/K3/URA5/1 (reduced size)
Annex II	Index of Representations
Annex III	Extract of Minutes of TPB Meeting held on 26.7.2024
Annex IV	Notional Schemes of Sites A and B under DSP
Annex V	Index of Major Grounds/Views/Proposals of Representations

Drawing H-1	DSP Area with Building Conditions
Drawings H-2 to H-4	Notional Scheme (Block Plan and Section Plans)
Drawing H-5	Notional Scheme - Conceptual Diagram
Drawing H-6	Notional Scheme - Landscape Design
Drawings H-7 to H-8	Tree Survey and Tree Treatment Plans
Drawing H-9	Notional Scheme – Traffic Arrangement Plan
Drawing H-10	Proposed Improvement Measures on Pedestrian Environment
Drawings H-11 to H-14	Artist's Impressions
Plan H-1	Location Plan
Plan H-2	Site Plan
Plan H-3	Aerial Photo
Plans H-4a to H-4h	Site Photos
Plan H-5	MRCP Framework under YMDS
Plan H-6	Building Completion Year Plan
Plan H-7	Building Height Plan

**PLANNING DEPARTMENT
JANUARY 2025**