

**CONSIDERATION OF REPRESENTATIONS AND COMMENTS
IN RESPECT OF THE DRAFT KOWLOON TONG
OUTLINE ZONING PLAN NO. S/K18/17**

Subject of Representations	Representers	Commenters
<p><u>Amendment Item A</u> Rezoning of the southern portion of the former Lee Wai Lee (LWL) Campus of Hong Kong Institution of Vocational Education at Renfrew Road from “Government, Institution or Community(9)” (“G/IC(9)”) to “Residential (Group B)” (“R(B)”)</p>	<p><u>Total : 25,847</u> <u>Support (11)</u> <i>Individuals:</i> R1 to R7, R6738, R6861, R8315 and R8322 <u>Providing Views (2)</u> <i>Individuals:</i> R1192 and R2375 <u>Oppose (25,834)</u> <i>LegCo members:</i> R9: Hon Lam Tai Fai (Annex II-1) R10: Hon Yip Kin Yuen (Annex II-2) R11: Hon Wong Pik Wan (Annex II-3) R12: Hon Chan Ka Lok Kenneth (Annex II-4) R7860: Hon Claudia Mo (Annex II-4a) <i>Kowloon City District Council members:</i> R13: Mr. Siu Leong Sing (Annex II-5) R14: Mr. Ho Hin Ming (Annex II-6) <i>Political parties and concern groups</i> R15: Civic Party (Annex II-7) R16-18: Members of Liberal Party (Annexes II-8 to II-10) R19: Hong Kong Teachers’ Union (Annex II-11) R20: HK重建關注組(Annex II-12) R21: Designing Hong Kong Limited (Annex II-13) R22: Green Sense (Annex II-14) R24: HK Kowloon City Industry and Commerce Association Ltd. (Annex II-15)</p>	<p><u>Total : 2,980</u> <u>Comment on supportive representation(s) (4):</u> C4: Hong Kong Baptist University (HKBU) (Annex III-1) C8, C9 and C10 (individuals) <u>Support representation(s) objecting to Item A (2,973):</u> <i>LegCo member:</i> C15: Hon Albert Chan Wai-yip (Annex III-2) <i>Concern groups:</i> C16: HKBU Postgraduate Association (Annex III-3) C17: 香港九龍城工商業聯會有限公司(Annex III-4) C12: Mary Rose School (Annex III-5) <i>Individuals:</i> C1, C8, C10, C11, C13, C14, C18 to C2981 (except C2038 which was withdrawn) <u>Provide views not supporting Item A (5):</u> C3:Lung Tong Area Committee (Annex III-6): C5: HKBU School of Business (Annex III-7) C2, C6 and C7 (individuals)</p>

Subject of Representations	Representers	Commenters
	R25 to R43 and R1506 HKBU, its staff/ affiliated associations/ alumni/ ex-teachers/ ex-staff (Annexes II-16 to II-35) <i>Individuals/Other organizations:</i> Remaining 25,798 representations (samples of some standard letters/ emails (Annexes II-36 to 40))	
<u>Amendment Item B</u> Rezoning of a site at Dumbarton Road covering the western part of the Bethel Bible Seminary (the BBS-west site) from “G/IC(3)” to “Residential (Group C)9” (“R(C)9”)	<u>Support (total : 1)</u> <i>Individual:</i> R5 <u>Oppose (total : 1)</u> <i>Individual:</i> R8	<u>Total : 1</u> C1 (individual) <i>support the representation objecting to Item B</i>
<u>Amendment Item C</u> Rezoning of a site at Dumbarton Road covering the eastern part of the Bethel Bible Seminary (the BBS-east site) from “G/IC(3)” to “G/IC(12)”	<u>Support (total : 1)</u> <i>Individual:</i> R5	

Note: A CD-ROM containing names of all representers and commenters¹ as well as submissions of all representations and comments is enclosed at **Annex X**. [for TPB Members only] All other annexes and plans could be found at the link to Town Planning Board (TPB)’s website provided to representers and commenters.

1. **Introduction**

- 1.1 On 15.2.2013, the draft Kowloon Tong Outline Zoning Plan No. S/K18/17 (the Plan) was exhibited for public inspection under section 5 of the Town Planning Ordinance (the Ordinance). The Schedule of Amendments is at **Annex I**. The amendments involve the following items (**Plan H-1**):

Item A - Rezoning of the southern portion of the LWL Site (the Site) (about 0.88ha) from “G/IC(9)” to “R(B)”

¹ The names of all representers and commenters can be found at the TPB’s website at http://www.info.gov.hk/tpb/en/plan_making/S_K18_17.html

Item B - Rezoning of the BBS-west site (about 0.2ha) from “G/IC(3)” to “R(C)9”

Item C - Rezoning of the BBS-east site (about 0.2ha) from “G/IC(3)” to “G/IC(12)”

- 1.2 During the two-month exhibition period, a total of 25,884 representations were received. On 21.5.2013, the representations were published for 3 weeks for public comments. A total of 2,981 comments were received. However, 33 representers subsequently wrote to the Town Planning Board (the Board) withdrawing their representations or indicating that they had not submitted the representations and 2 representations were duplicated. In addition, one (**R6618**) (**Annex II-41**) is related to Item A but does not indicate support or objection nor providing any views, and two (**R15008** and **R15038**) (**Annexes II-42 and II-43**) are related to the military site at Central but not to the Kowloon Tong OZP. Subject to the Board’s agreement, these 3 representations should be regarded as invalid. The total number of valid representations should be 25,847. Besides, one comment was subsequently withdrawn. The total number of valid comments is 2,980.
- 1.3 On 24.1.2014, the Board agreed to consider all the representations and comments itself collectively.
- 1.4 This Paper is to provide the Board with information for the consideration of the representations and comments. **Part 1** of this paper covers the representations and comments in relation to Amendment Item A and **Part 2** covers the representations and comment in relation to Amendment Items B and C.
- 1.5 The representers and commenters have been invited to attend the meeting in accordance with section 6B(3) of the Ordinance.
- 1.6 On 20.12.2013, the draft Kowloon Tong OZP No. S/K18/18 incorporating amendments to rezone a site occupied by the Kowloon International Baptist Church at 300 Junction Road from “G/IC(2)” to “G/IC(13)” was exhibited for public inspection under section 7 of the Ordinance. The zonings and development restrictions of the representation sites, i.e. the Site, the BBS-west site and the BBS-east site, covered by this Paper remain unchanged on OZP No. S/K18/18.

PART 1 – Amendment Item A : Rezoning the Site from “G/IC(9)” to “R(B)” (Plans H-2 to H-5)

2. Background

- 2.1 In order to tackle the pressing housing problems in Hong Kong, the Chief Executive announced on 30.8.2012 a package of short and medium terms measures to expedite the supply of subsidised and private housing units. One of the measures is to convert the use of 36 “G/IC” and Government sites, which are considered suitable for residential uses after review by the Planning Department (PlanD), to meet the pressing demand for housing land. The Site at Renfrew Road, Kowloon Tong (**Plan H-2**) is one of these sites.

- 2.2 The Site (about 0.88 hectare), then zoned “G/IC(9)”, is a piece of Government land and was part of the former LWL campus site of the Hong Kong Institute of Vocational Education (IVE). In 2011, the LWL IVE was relocated to Tseung Kwan O. The Education Bureau (EDB) had confirmed that the northern portion of the LWL site (LWL-north site) (about 0.64ha) (**Plan H-3**) would be retained for higher educational use by the Hong Kong Baptist University (HKBU) whereas the Site (about 0.88ha), i.e. the southern portion of the LWL site, could be returned to Government for other uses.
- 2.3 PlanD had conducted a review of the requirement of GIC land. Based on the planned population for the area (including the proposed “R(B)” zone at the Site) as well as GIC provision in the area at that time, it was considered not necessary to reserve the Site for provision of local GIC facilities. With regard to other GIC facilities, relevant Government departments consulted confirmed that the Site was not required for other GIC uses. Besides, adequate land was reserved for open space use.
- 2.4 The Site is located at the street block mainly occupied by the medium-rise and medium-density buildings of HKBU. The two HKBU hostel buildings behind the Site and the HKBU Communication and Visual Arts Building to its south are 62m (19 storeys) and 50m (11 storeys) tall respectively (**Plan H-4**), where the residential and GIC buildings across Renfrew Road are mainly low-rise of 12m to 22m (4 to 6 storeys). The Site is considered suitable for residential use. Having examined the development potential of the Site, the building height profile and development densities for the area, the Site was proposed to be rezoned to “R(B)” subject to a maximum building height of 50m and plot ratio of 4.5 to help meet the acute housing demand. The proposed parameters are considered broadly compatible with the planned stepped height profile on the two sides of Renfrew Road and plot ratios of the surrounding buildings, ranging from 3.1 to 5.8 (**Plan H-4**), in the area. In addition, as confirmed by concerned departments, the proposed residential development is acceptable from traffic, environmental, visual and air ventilation points of view and would not overload the existing infrastructure.

MPC’s considerations

- 2.5 On 21.12.2012, the Metro Planning Committee (MPC) considered the proposed amendments to OZP No. S/K18/16. MPC decided to defer the consideration of the proposed amendment to the Site pending the provision of more information on EDB’s policy in assessing the expansion needs of HKBU and its justifications to release the Site for other uses. Extract of the minutes of the MPC meeting is at **Annex IVa**.
- 2.6 On 25.1.2013, MPC further considered the proposed amendment to the OZP in respect of the Site with the attendance of representatives of EDB, the Food and Health Bureau (FHB), University Grants Committee (UGC) and PlanD at the meeting. A number of submissions from the office of Hon. Wong Yuk Man, President & Vice-Chancellor of HKBU, Staff Representative and Court of HKBU, HKBU Student Union and HKBU Century Club Limited objecting to the proposed rezoning were submitted to and considered by MPC. Members agreed that the proposed amendment should be exhibited under section 5 of the Ordinance so that

stakeholders and members of the general public would have an opportunity to submit representations to the Board as provided for under the Ordinance, and their views could be heard by the full Board before the Board decided on the appropriate zoning for the Site. Extract of the minutes of the MPC meeting is at **Annex IVb**. On 15.2.2013, the draft Kowloon Tong OZP No. S/K18/17, incorporating the above amendment, was exhibited under section 5 of the Ordinance.

LegCo Case Conference

- 2.7 On 11.12.2012, a Legislative Council (LegCo) case conference was held to discuss a complaint on hostel shortfall of HKBU. At the case conference, the LegCo members present unanimously raised objection to rezoning the Site for residential use. They urged the Government to proactively and fully consult stakeholders (including the neighbouring UGC-funded institutions) on the rezoning proposal, with a view to balancing the interests and needs of relevant parties.

3. Consultation after exhibition of the draft OZP in relation to Item A

KCDC HIC

- 3.1 The Housing and Infrastructure Committee of the Kowloon City District Council (KCDC HIC) was consulted on the Amendment Items on 7.3.2013 (extract of the meeting minutes is at **Annex Va**). All members unanimously objected to the rezoning of the Site (**Amendment Item A**) and supported continue the use of the Site for education use or other GIC uses. The main views/concerns of KCDC HIC members are summarized as follows:
- (a) The Site should be retained as “G/IC(9)” zone for public good as land for higher education was not enough, and Kowloon Tong district was in need of elderly and community facilities. The Government should consider other proposals including subsidized housing, youth hostel, community facilities and student hostels, and should not use the Site for luxury housing as it could not resolve the housing shortage in Hong Kong.
 - (b) Residential development would create burden on the existing traffic capacity and was incompatible with the fire station and student hostels nearby as the noise generated by these uses would affect future residents.
 - (c) Government should discuss with HKBU on the feasibility of developing private Chinese medicine hospital (CMH) at the Site.
 - (d) Government should widely consult all stakeholders, including residents, students/staff of HKBU in a fair and open manner and should not include the Site in the Land Sale Programme (LSP) before consulting the KCDC and the Board.
- 3.2 The main responses by the Government (including representatives of the Development Bureau (DEVB), EDB, FHB and PlanD) at the meeting are summarized as follows:

- (a) There were sufficient GIC facilities in the area and the Site was considered suitable to be rezoned for residential purpose to meet the housing needs of the community. No adverse environmental and traffic impacts were anticipated.
 - (b) If HKBU fully utilized the LWL-north site already reserved to them, it would be able to fully meet its outstanding requirements under the existing policy. There was then no established policy to provide Government land for the development of a private CMH.
 - (c) The Social Welfare Department would be consulted again on the needs of welfare facilities in the area. Government would consolidate comments from KCDC for consideration of Board.
 - (d) Inclusion of the Site in LSP was an established Government practice to provide the market with information about anticipated land supply in the coming year. The Site would only be put up for sale after completion of the necessary statutory planning and other processes.
- 3.3 On 7.11.2013, HIC discussed the matter again and reiterated their objection to rezoning the Site to “R(B)” (extract of meeting minutes is at **Annex Vb**). On 27.11.2013, the Secretary of the Board received a letter from HIC (**Annex Vc**) relaying Members’ objection to the rezoning and retaining the Site as “G/IC(9)” zone.

LegCo Panel on Education

- 3.4 The Panel discussed the rezoning of the Site at its meetings on 11.3.2013 and 10.6.2013 (extracts of meeting minutes are at **Annex Vd and Annex Ve**). The Panel passed a motion on 11.3.2013 opposing Government’s changing of the educational use of the Site and including the Site in the LSP for the construction of medium-density luxury residential units, and urging the Government to retain the Site for “G/IC” use. Their main views/concerns are summarised as follows:
- (a) Government should adopt a long-term vision on the planning and development of universities. EDB should demonstrate support for the development of the tertiary education sector by striving to retain the Site for education use.
 - (b) As revealed in the vast majority of representations received by the Board, the community's view was very clear. In proposing to rezone the Site, the Administration had failed to accurately gauge the prevailing public opinions on the matter.
 - (c) As luxury residential properties could hardly address the housing needs of the community, consideration might be given to building public rental housing or Home Ownership Scheme flats on the Site.

- (d) The Administration had bypassed the proper town planning procedures by including the Site in the LSP before the Board's consideration of the representations.
- (e) The Administration should take action to address the need for CMH in Hong Kong. CMH could facilitate the teaching and conduct of researches on Chinese medicine. However, there was no CMH in Hong Kong and clinical internship opportunities could only be found in the Mainland.

3.5 The main responses by the Government (including representatives of DEVB, EDB and FHB) are summarized as follows:

- (a) The Administration and UGC supported HKBU and other UGC-funded institutions in their campus development on a fair and consistent basis in accordance with well-established policies.
- (b) After careful assessment, the Administration considered the Site not required for higher education purpose or other GIC purpose, and suitable to be rezoned for medium-density residential development to optimise the use of land and meet the housing need of the community. On the future use of the Site, the Board had yet to consider the representations and comments on the rezoning proposal and complete the statutory process.
- (c) Inclusion of the Site in LSP was an established Government practice to provide the market with information about anticipated land supply. The Site would only be put up for sale after completion of the necessary processes.
- (d) Medical facilities for the general public and proposal to set up a hospital should first and foremost be considered from the perspectives of healthcare and community needs. The issue of Chinese medicine in-patient service was being studied by the Chinese Medicine Development Committee (CMDC). CMH proposed by HKBU was a self-financed project not eligible for UGC funding and there was then no established policy to provide government land for development of a private CMH. There was also no requirement that the hospital must be within or close to the university campus.

4. The Representations in relation to Item A

4.1 Subject of Representations (Plan H-1)

The 25,847 valid representations are all related to Item A, of which, 11 representations (**R1 to R7, R6738, R6861, R8315, R8322**) submitted by individuals support Item A. Two representations (**R1192 and R2375**) provide comments on Item A. The remaining 25,834 representations oppose Item A. They are submitted by five LegCo Members (Hon Lam Tai Fai (**R9**), Hon Yip Kin Yuen (**R10**), Hon Wong Pik Wan (**R11**), Hon Chan Ka Lok Kenneth (**R12**) and Hon Claudia Mo (**R7860**)) (**Annexes II-1 to 4a**), two KCDC members (Mr. Siu Leong Sing (**R13**) and Mr. Ho Hin Ming (**R14**)) (**Annexes II-5 & 6**), HKBU (**R25**) (**Annex II-16**) and its staff, affiliated associations, students, alumni and ex-staff, concern groups, different organizations and

individuals. Many of them are submitted in similar emails/letters and the samples are attached at **Annexes II-36 to 40**. A full set of the representations and comments are saved in the CD-ROM attached at **Annex X** for Members' reference. A set of hard copy is also deposited at the Secretariat of the Board for Members' inspection.

4.2 Major Grounds of Representations on **Item A**

Supportive Representations

4.2.1 The major grounds of the 11 supportive representations (**Annex VIa**) are summarized below:

- (a) The rezoning of the Site for residential use can help meet the urgent need for residential land even to a small extent. The proposed flat provision in Kowloon Tong could stabilize the property price and rent. If possible, it is better to rezone the Site to "Residential (Group A)" ("R(A)").
- (b) HKBU's facilities are adequate. The shortage of student dormitory is due to their enrolment of too many students from the Mainland.
- (c) The proposed CMH is not necessary to be built at the Site which is valuable. The Tsim Sha Tsui District Kai Fong Welfare Association site is a favourable site for a Chinese medicine teaching hospital (CMTH). There is no need for HKBU to have its own CMTH.

Representations Providing Comments

4.2.2 Two representations provide comments on the amendment. **R1192** objects to giving the Site to HKBU and opines that there is no need for HKBU to use the Site, and its campus has already been expanded. **R2375** is of the view that the Site should not be given to HKBU for building a CMH.

Adverse Representations

4.2.3 The major grounds of the 25,834 adverse representations and PlanD's responses are in **Annexes VIb and VIc** and summarised below:

Loss of land for GIC facilities

- (a) There is limited GIC land but a lot of alternatives for residential use in other locations. The rezoning would be an irreversible loss to the community. The Site should be used for other appropriate uses to benefit more people such as community centre, educational, medical and social welfare facilities as well as recreational use or park. Residential use could only benefit a small number of people.
- (b) The original "G/IC" zoning of the Site is to serve as a buffer in the residential area to avoid excessive density. The "R(B)" rezoning violates the original intention.

Educational/Higher educational use

- (c) Education is important to the next generation and future development of Hong Kong and will contribute greatly to building up the knowledge base society. It can benefit more people and should be accorded with priority than other uses like economic development and luxury housing. The authority should not sacrifice long-term educational need for short-term economic benefit.
- (d) There is a shortage of land for educational/higher educational purposes. According to Government statistics, the shortage amounts to 80,000m² net operational floor area for the eight UGC-funded institutions. Besides, student hostel places of tertiary education institutions are inadequate.
- (e) The Site is surrounded by university campus and is in close proximity to two universities. It is more suitable for higher educational use.

HKBU expansion needs

- (f) The HKBU campus (around 5.4 ha) is the smallest among the eight UGC-funded institutions. It has not been allocated additional land for developing necessary facilities for the implementation of the 3-3-4 academic reform and has to build new facilities on campus or construct additional floors on existing buildings. HKBU campus is already congested to the point of saturation.
- (g) The Site can be most efficiently used by allocating it to HKBU for its long-term development. The Site is surrounded on three sides by HKBU buildings and is geographically an integral part of HKBU. The expansion of HKBU into the Site will consolidate the University's activities in one location and allow HKBU to provide a better environment, much-needed facilities and increased activity space for the students. The Site is important for HKBU's long-term development. It is extremely difficult for HKBU to find land nearby to expand in the future.
- (h) Student hostel places in HKBU are inadequate. The Government said that the LWL-north site is adequate to meet their need under the exiting educational policy. This reflects the short-sightedness of the Government, ignoring the long-term development of higher education. Living in a student hostel is part of university life. Those off-campus hostels cannot help students to enjoy life on campus and require additional cost to students. The Site should be used for construction of student hostel.
- (i) HKBU has been liaising with the Government over future use of the Site for several years. HKBU has neither indicated to the Government nor come to any agreement with the Government that HKBU requires only half of the land and is ready to withdraw its request for the whole LWL site. HKBU should be given a fair opportunity to apply for use of the whole LWL site.

CMH/CMTH and/or other medical facilities

- (j) Chinese medicine is effective in treating chronic and refractory diseases. Given the aging population in Hong Kong, the need for Chinese medicine is imminent. Without a CMTH, there would not be a systematic Chinese medicine education. A CMTH can provide venue for clinical training, facilitate clinical research, and contribute to the advancement, standardization and modernization of Chinese medicine, integration of Chinese and western medicine and professionalization of the Chinese medicine industry. Without in-patient service, the development of Chinese medicine, especially treatment for emergency and critical illness, is limited.
- (k) A CMTH should best be located at the Site which is adjacent to the Chinese Medicine Building of HKBU as this will enhance the effectiveness of the treatment. Teaching hospital of renowned Chinese medicine universities are built near their campus. Besides, HKBU has been reputable for the Chinese medicine discipline. Building a CMH by HKBU on the Site would enhance the development of Chinese medicine and public health to the benefits of patients.
- (l) A CMTH will enable Chinese medicine students to conduct their internships in Hong Kong. Chinese medicine students currently have to do internship in the Mainland. The medical system of the Mainland is different from that of Hong Kong, and what students learnt in the Mainland cannot be all applied to Hong Kong. This creates many problems. A CMTH can support not only HKBU, but also Chinese medicine students from other institutions.

Proposed residential use

- (m) The development of luxury flats fails to address the society's urgent need for smaller flats. There are a lot of flats/luxury flats in Kowloon Tong. There is objection to luxury housing which adds little to the real economy. If the Site is to be used for residential purpose, it should be for development of public housing to resolve grass root housing problem.
- (n) The Site is not suitable for residential use which is not compatible with the surrounding educational use. Future residents on the Site will complain against noise from the nearby student hostels, while residential use will adversely affect the educational environment.
- (o) The proposed luxury housing will generate additional traffic, creating air and noise pollution which would adversely affect the general environment of the area. There is insufficient supply of community services for future residents and this would add pressure on the facilities nearby.
- (p) There is a need for a comprehensive plan to address the housing problem rather than ad hoc projects on scattered small sites.

Public consultation

- (q) There is inadequate consultation. The Government has ignored public views. Transparency of the public consultation process should be enhanced. The Government should consult stakeholders including HKBU and its students and consider their views.
- (r) It is misleading to the public and procedurally wrong to include the Site in the LSP while the public consultation on the rezoning is still underway.

Others

- (s) There are other points or views in the representations, e.g. objection to developer hegemony; suggestion of using other sites for residential development such as the nearby military site, private recreational sites and vacant Government land; concern on luxury housing would raise property price, etc. These points and PlanD's responses are summarized under point H in **Annex VIb**.

4.3 Representers' Proposals

- (a) A total of 24,406 representers propose that the Site should be reverted to "G/IC(9)"/ "G/IC" zone or reserved for GIC uses.
- (b) Many of the representers also suggest that the Site should be reserved for HKBU for educational use and/or a CMTH; for development of a CMH/CMTH; and/or for development of other GIC facilities, e.g. recreational facilities, social welfare facilities, elderly facilities, etc.

5. Comments on Representations in relation to Item A

- 5.1 The 2,980 valid comments on representations are submitted by a LegCo Member (Hon Albert Chan Wai-yip, **C15**) (**Annex III-2**), HKBU (**C4**) (**Annex III-1**) and its affiliated association, Lung Tong Area Committee (**C3**) (**Annex III-6**), concern groups and individuals. All of them support the representations objecting to Item A, raise objection to the rezoning of the Site for residential use and/or suggest retention of the "G/IC(9)" zoning for the Site. All the submissions are saved in the CD-ROM attached in **Annex X** for Members' information. The major grounds of the comments and PlanD's responses are at **Annex VII**, which are similar to those raised by the adverse representations. Among them, 257 support the representations that object to Item A without providing reason, while 2,720 are mainly for reasons that they object to using educational land for luxury housing, the Site should be offered to HKBU for development, including academic facilities, student hostel and/or CMTH. **C12** (**Annex III-5**) submitted by a nearby school supports **R25** submitted by HKBU on grounds that rezoning of the Site for residential use would have adverse impact on noise, air quality, natural lighting and air ventilation and would increase risk of traffic accidents due to increase in traffic flow. The commenter supports retaining the Site as "G/IC(9)".

- 5.2 Four commenters provide views on the supportive representations (with 2 of which also support the representations that object to Item A). They mainly support HKBU and consider that the Site would not help address the housing problem. C4 submitted by HKBU (**Annex III-1**) provides an analysis of the adverse representations on Item A submitted to the Board.

6. Planning Considerations and Assessment in relation to Item A

6.1 The Site and Its Surrounding Areas (Plans H-3 to H-5)

- 6.1.1 The buildings on the LWL campus site are currently being used by HKBU and Hong Kong Polytechnic University on a temporary basis until end of 2014 to meet the contingency need during the initial stage of implementation of the new academic structure. The Site abuts the buildings of HKBU on two sides. The 11-storey (50m) HKBU Communication and Visual Arts Building are located to its immediate south, and the 19-storey (62m) HKBU Student Residence Halls and Kowloon Tong Fire Station are to its immediate east.
- 6.1.2 To the northeast and further north of the Site are the HKBU Baptist University Road campus and Renfrew Road campus with most buildings ranging from 10 (41m) to 13 storeys (64m). The Kowloon Tong military camp, two elderly homes and a school are located to the west of the Site across Renfrew Road. To the further west and south of the Site lies the low-rise (with building height of about 4 storeys) and low-density residential developments of the Kowloon Tsai area which is zoned “R(C)4” on the OZP. The Kowloon Tsai Park is located to the further southeast across Hereford Road.

6.2 Land Administration

The Site is a piece of Government land.

6.3 Planning Intention

The “R(B)” zone is primarily for medium-density residential developments where commercial uses serving the residential neighbourhood may be permitted on application to the Board. The zone is restricted to a maximum plot ratio of 4.5 and a maximum building height of 50m, to be measured from the mean level of Renfrew Road.

6.4 Responses to Grounds of Representations and Representers’ Proposals in relation to Item A

Supportive Representations

- 6.4.1 The views of the 11 supportive representations supporting the “R(B)” zoning are noted. However, as elaborated in paragraphs 6.4.4(c) and (d) below, the Site is proposed to be reverted to “G/IC(9)” zone.

- 6.4.2 On the suggestion for HKBU to develop a CMTH at the Tsim Sha Tsui District Kai Fong Welfare Association site, it is noted that HKBU have indicated that they would no longer pursue the proposal to develop a CMTH at that site. For responses to other points, please see **Annex VIa**.

Representations Providing Comments

- 6.4.3 In respect of the representers' view that the Site should not be given to HKBU, it needs to be clarified that the Board's role is to consider the appropriate zoning of the Site. The Board has no mandate to decide on the granting of the Site to a particular party for a specific GIC use. Whether the Site should be granted to HKBU or not falls outside the ambit of the Board. This is a land allocation issue to be considered by the Government under the prevailing land and education policy.

Adverse Representations

- 6.4.4 The responses to the grounds of adverse representations are as follows:

General

- (a) As set out in the background in paragraph 2 above, in considering the rezoning proposal, the MPC had noted the views expressed by HKBU and other stakeholders on retaining the Site for GIC uses or for long-term development of HKBU. Taking into account PlanD's assessment on the provision of GIC facilities in the area at that time and EDB's confirmation that the Site is beyond the requirement of HKBU, and the fact that residential use is not incompatible with the surrounding uses of the Site and would not generate adverse impact on various technical aspects, MPC agreed to exhibit the rezoning amendment to provide a statutory channel for the stakeholders and general public to submit their views to the full Board for consideration.
- (b) Concerned bureaux/departments have been further consulted on the representations and comments and their latest assessments on the matter particularly in respect of any updated requirement for reserving the Site for GIC uses. The consolidated assessments are set out below.

Responses to Grounds of Representations in relation to Item A

Loss of land for GIC facilities

- (c) As set out in paragraph 2 above, there was no need to reserve the Site for GIC or open space use at the time when MPC considered the rezoning proposal in late 2012/early 2013. Due to the pressing need for housing land and that residential development is not incompatible with the surrounding uses of the Site, the Site was proposed to be rezoned to "R(B)". In processing the representations to this amendment item, PlanD has re-assessed the demand for GIC facilities in consultation with

concerned bureaux/departments, though there is generally no shortage in planned major GIC facilities and open space in Kowloon Tong area (**Annex VIII**). Upon re-assessment, EDB indicates that, during recent rounds of consultation, different quarters of the community have requested the Administration to strengthen support for special education development. In this respect, EDB has decided to carefully study the feasibility of using the Site for special school development.

- (d) While residential use is considered suitable at the Site from land use compatibility viewpoint, in view of the latest response of EDB and the clear support of the local community and the general public for retaining the Site for GIC use, it is proposed that the Site be retained for GIC use and reverted to its original zoning of “G/IC(9)”. A wide range of GIC uses including special school (or other educational, community and medical facilities as suggested by some representers) is always permitted within the “G/IC(9)” zone, and can be accommodated under the permitted building height of 13 storeys for the zone. However, whether the Site should be reserved for special school or other educational uses, or other permitted uses under “G/IC(9)” zone should be determined by EDB or the Government with reference to its policy priority. This is a matter outside the purview of the Board.

Educational/Higher educational /HKBU expansion need

- (e) In respect of the need for land for higher education use, EDB reiterates that the Administration and the UGC have all along been supporting UGC-funded institutions in the development of publicly-funded academic facilities and student hostels in accordance with well-established policies and calculation criteria. To cater for the outstanding demand, EDB is in discussion with some of the institutions with a shortfall of hostels and academic facilities, with a view to exploring the feasibility of constructing hostels or academic facilities in various places in Hong Kong. For HKBU, EDB has decided to reserve the northern part of the LWL site for higher education use and reaffirms its commitment to meet all of HKBU’s outstanding requirements for publicly-funded academic space and student hostel places under the prevailing policies and calculation criteria. In response to the view that the site area of HKBU is the smallest among all funded higher education institutions, EDB advises that different institutions have varying geographical conditions (such as proportion of usable land within campus, geographical locations, development parameters of the respective lots, topology of campus buildings, etc), and it is not appropriate to make a simplistic comparison of site area among different institutions. The Site is currently a piece of Government land and has never been included within HKBU’s campus area. The Government has no policy to allocate a piece of Government land to an individual institution simply because it is next to the institution.

CMH/CMTH and other medical facilities

- (f) FHB advises that the Government has all along been committed to promoting the development of Chinese medicine in Hong Kong. The CMDC established in February 2013 has been studying, among other issues, the development of a CMH in Hong Kong. As announced by the Chief Executive in his 2014 Policy Address, the Government has, after considering the CMDC's recommendation, decided to reserve a site in Tseung Kwan O to set up a CMH. At this stage, the Government will focus on working with CMDC to carry out studies on the feasible mode of operation and regulatory details for CMH at the reserved site in Tseung Kwan O. For that purpose, the Hospital Authority (HA) in collaboration with selected HA Chinese Medicine Centres for Training and Research, would conduct a pilot on integrated Chinese and Western medicine services for in-patients with selected illness type at some of the HA hospitals.
- (g) With regard to the proposal of setting up a CMTH on the Site by HKBU, EDB is of the views that three UGC-funded institutions currently offering Chinese medicine programmes at undergraduate and postgraduate levels have already established arrangements for students of these programmes to take their clinical training in local Chinese medicine clinics or in the Mainland. CMTH is not an academic facility eligible for funding under the prevailing policy. In line with the prevailing policy, land is not directly allocated to individual institutions for self-financing operation. FHB considers that it is not a must to have the teaching hospitals within or close to the university campus. Given that a CMH is a medical facility that primarily serves the general public, any proposal to set up such a CMH should first and foremost be considered from the perspectives of healthcare and community needs.
- (h) For other medical facilities, as far as Kowloon region is concerned, the Government has reserved a site in the Kai Tak Development Area for hospital use and is actively planning the construction of a new acute hospital in the Area which will provide clinical services of major specialties, including accident and emergency services. The Government is also taking forward a number of hospital redevelopment/expansion/refurbishment projects in the Kowloon region with the aim of increasing the service capacity to meet the community's demand. Currently, the Government has no plan to reserve additional sites in Kowloon for hospital use; and will continue to closely monitor the demand and supply of healthcare services in the Kowloon region and review the need for reserving additional sites for the purpose. As for public general outpatient clinic services, the Government has reserved a site in the Kowloon City District to cater for the long-term community needs of the district, including outpatient clinic services, and will continue to closely monitor the service demand in the Kowloon City District.

Public consultation

- (i) The publication of the amendment under section 5 of the Ordinance is a statutory public consultation procedure. On 25.1.2013, the MPC decided to exhibit the rezoning amendment to provide a statutory channel for the stakeholders and general public to submit their views to the full Board for consideration. During the 2 months plan publication period, KCDC was consulted and the concerned stakeholders including HKBU, local community and the general public were provided with opportunity to submit representations to the Board for consideration. All the representations and comments received are submitted to the Board for consideration, and the representers and commenters are allowed opportunity to attend and to be heard by the Board.
- (j) According to DEVB, it is the established practice of the Government to include all anticipated Government sites that are expected to become available in a certain year, including those which are pending completion of various processes and town planning procedures, into that year's LSP. This could provide clear information about the anticipated land supply to the market so that the market could be prepared. The concerned sites would only be put up for sale after completion of the necessary processes (in this case, the completion of the statutory planning process). In view of the Administration's intention of retaining the Site for GIC uses, the Site has been taken out from the LSP for 2014/15.

Proposed Residential Use

- (k) Some representers consider that the Site is not suitable for residential use. As mentioned in paragraph 2.4 above, the proposed residential use is considered congruent with the nearby developments and is acceptable from visual, air ventilation, traffic and environmental aspects. There are also enough planned GIC facilities and open space to serve the planned population for the area.
- (l) There are also objections to luxury housing and suggestion for using the Site for public/subsidized housing. To meet the needs of different sectors of the community, land will be reserved for development of public housing and private housing of different development density at various locations with due regard to the condition and surrounding environment of the respective sites. Public housing development, which is normally with a higher development intensity, is considered not compatible with the low to medium density environment in the area.

Others

- (m) Other responses to the adverse representations on Item A are at **Annex VIb** for Members' reference.

Responses to Representers' Proposals in relation to Item A

6.4.5 Regarding the proposals of most of the representers to revert the Site to "G/IC(9)" or "G/IC" zone, based on the consideration set out above, PlanD supports reverting the zoning of the Site to "G/IC(9)".

6.4.6 With regard to the various proposals of the representers to reserve the Site for educational/higher educational, community, CMH/CMTH/medical or other specific GIC uses, these uses are permitted under the proposed "G/IC(9)" zone. As a general principle, the role of the Board is to consider the appropriate zoning of the Site taking into account various factors such as land use compatibility, traffic, environmental, visual, air ventilation impacts and other infrastructural consideration as well as public views. Land allocation of the "G/IC" site for a particular user falls outside the ambit of the Board and should be considered by the Government with reference to its policy priority.

6.5 Responses to Grounds of Comments on Item A

The grounds of the comments on Item A are generally similar to those raised in the representations. The responses to the representations on Item A in paragraphs 6.4 are relevant. Detailed responses to the comments are at **Annex VII**.

7. Consultation in relation to Item A

7.1 The following Government bureaux/departments have been consulted and their comments have been incorporated in the above paragraphs or **Annex VIb** and **VII** where appropriate:

- (a) Secretary for Development;
- (b) Secretary for Education;
- (c) Secretary for Food and Health;
- (d) Commissioner for Transport;
- (e) Chief Town Planner/Urban Design and Landscape, PlanD;
- (f) Director of Environmental Protection;
- (g) Director of Fire Services;
- (h) Director of Social Welfare; and
- (i) District Lands Officer/Kowloon East, Lands Department.

7.2 The following Government departments have no comment on the representations and comments:

- (a) District Officer (Kowloon City), Home Affairs Department;
- (b) Chief Highway Engineer/Kowloon, Highways Department;
- (c) Chief Engineer/Mainland South, Drainage Services Department; and
- (d) Chief Engineer/Development(2), Water Supplies Department.

8. Planning Department's Views in relation to Item A

Supportive Representations and Representations providing comments

- 8.1 The supportive views of **R1 to R7, R6738, R6861, R8315, R8322** are noted. However, while the Site is considered suitable for both GIC and residential use, as explained in paragraphs 6.4.4(c) and (d) above, it is proposed that the Site be reverted to "G/IC(9)" zone to meet the latest need for GIC uses. The views provided by **R1192 and R2375** not supporting giving the Site to HKBU are noted but as elaborated in paragraph 6.4.6 above, land allocation of the "G/IC" site for a specific organization falls outside the ambit of the Board .

Adverse Representations

- 8.2 Based on the assessments in paragraph 6 above, PlanD considers that the Plan should be amended to meet/partially meet these representations by reverting the zoning of the Site from "R(B)" to "G/IC(9)" as shown on the plan in **Annex IX** and amending the Notes of the OZP as indicated in **Annex IX**. In tandem with the proposed amendment to the Plan, the Explanatory Statement should also be revised as proposed in **Annex IX**. With regard to the suggestions raised by many representers of using the Site for specific GIC facilities such as CMH, CMTH, HKBU campus, HKBU hostel, other educational or medical facilities, social welfare facilities, as mentioned in paragraph 6.4.6 above, the role of the Board is to consider the appropriate zoning for the Site. While the relevant GIC uses are always permitted in the "G/IC(9)" zone to be reverted, the allocation of the Site for a particular GIC user falls outside the purview of the Board.

PART 2 - Amendment Items B & C: Rezoning the BBS-east and BBS-west sites from "G/IC(3)" to "G/IC(12)" and "R(C)9"

9. Background

- 9.1 On 7.9.2012, MPC partially agreed to a s.12A application No. Y/K18/6 relating to the BBS site at 45 and 47 Grampian Road to facilitate redevelopment of the seminary.
- 9.2 To carry forward its decision, MPC agreed on 21.12.2012 the rezoning of the BBS-west site from "G/IC(3)" to "R(C)9" for low-rise residential development (**Amendment Item B**) and the BBS-east site from "G/IC(3)" to "G/IC(12)" (**Amendment Item C**) for seminary redevelopment with requirement for in-situ preservation of the existing Grade 2 building, i.e. Sun Hok Building. On 15.2.2013, the draft Kowloon Tong OZP No. S/K18/17, incorporating the above amendments, was exhibited under section 5 of the Ordinance.

10. Consultation on HIC of KCDC in relation to Items B and C

The KCDC HIC was consulted on 7.3.2013 and have no adverse comment on Items B and C (extract of the meeting minutes is at **Annex Va**).

11. The Representations in relation to Items B and C

11.1 Subject of the Representations (Plan H-1)

R5 submitted by an individual supports Items B and C. **R8** submitted by an individual opposes Item B.

11.2 Major Grounds of Representations on Items B and C

Supportive Representation

- (a) **R5** supports Item B on ground of supporting provision of more flats and inclusion of the “Hong Kong property for Hong Kong people” clause to the BBS-west site. **R5** considers that it is better to rezone the BBS-west site to “R(A)”, if possible.
- (b) **R5** supports Item C on ground of supporting preservation of historic building with characteristic.

Adverse Representations

- (c) **R8** opposes Item B mainly on grounds that the scarce GIC land for public use would be reduced due to rezoning of the BBS-west site for residential use, with provision of only 44 luxury flats which cannot resolve the shortage of public housing or small flats, and there are no planning justifications to rezone the BBS-west site for residential use. The Government should compensate the loss of GIC land by rezoning a residential site for GIC use.

12. Comments on Representations in relation to Items B and C

C1 submitted by an individual supports the representation that objects to Item B.

13. Planning Considerations and Assessment in relation to Items B and C

13.1 The BBS Site and Its Surrounding Areas (Plan H-2)

- 13.1.1 The BBS site is located at the south-eastern periphery of Kowloon Tong near the Kowloon City area and bounded by Inverness Road to the west and Dumbarton Road to the north. It is currently occupied by the Bethel Kindergarten and Sear Rogers International School.
- 13.1.2 The BBS site is located within a street block mainly zoned “R(C)9” and surrounded by low to medium-rise/density residential developments to the north, east and south. The Munsang College is located to the BBS site’s immediate north across Dumbarton Road and the Kowloon Tsai Park is located to its immediate west across Inverness Road.

13.2 Land Administration

The BBS site falls within the western part of New Kowloon Inland Lot No. 1382. The Lease will expire on 30.6.2047. The proposed redevelopment for residential blocks is in breach of the existing lease conditions. The lot owner will need to apply for a lease modification for the proposed redevelopment.

13.3 Planning Intention

The “R(C)9” zone is intended primarily for low to medium-rise, low density residential developments where commercial uses serving the residential neighbourhood may be permitted on application to the Board. The zone is restricted to a maximum plot ratio of 3 and a maximum building height of 8 storeys. The “G/IC(12)” zone is intended primarily for the provision of institution or community facilities serving the needs of the local residents as well as the general public, with the graded historic building, Sun Hok Building of the Bethel Bible Seminary, preserved in-situ.

13.4 Responses to Grounds of Representations and Comment in relation to Items B and C

13.4.1 **R5**’s support to Items B and C is noted. Regarding **R5**’s view that it is better to rezone the BBS-west site under Item B to “R(A)”, in view of the surrounding low to medium density residential developments which are zoned “R(C)”, the current “R(C)9” zoning is considered appropriate.

13.4.2 For **R8** which opposes Item B on grounds of losing of GIC land and that the proposed luxury housing could not meet the housing need for small flats, the responses in paragraphs 6.4.4(c) and (d) and 6.4.4(l) above are relevant. Adequate land has been reserved in Kowloon Tong for GIC use to meet the demand in Kowloon Tong.

13.4.3 For comment no. **C1** which supports **R8**’s objection to Item B, the response in paragraph 13.4.2 above is relevant.

14. Consultation in relation to Items B and C

The following Government departments have no comment on the representations and comment:

- (a) Commissioner for Transport;
- (b) District Lands Officer/Kowloon East, Lands Department;
- (c) Director of Environmental Protection;
- (d) Chief Town Planner/Urban Design and Landscape, PlanD;
- (e) Chief Highway Engineer/Kowloon, Highways Department;
- (f) Chief Engineer/Mainland South, Drainage Services Department;
- (g) Chief Engineer/Development(2), Water Supplies Department;
- (h) Executive Secretary, Antiquities and Monuments Office, Leisure and Cultural Services Department; and
- (i) District Officer (Kowloon City), Home Affairs Department.

15. Planning Department's Views in relation to Items B and C

- 15.1 The supportive views of **R5** and comment of **C1** as detailed in paragraphs 11.2(a) and (b) and 12 are noted.
- 15.2 For the part of **R8** that opposes Amendment Item B, based on the assessments in paragraph 13 above and for the following reason, PlanD does not support **R8**'s representation on Item B and considers that the Plan should not be amended to meet the representation:

As there is adequate planned provision of GIC facilities to meet the need in the Kowloon Tong area, it is appropriate to rezone the BBS-west site to "R(C)9" to meet the pressing demand for housing land. The proposed "R(C)9" zoning is compatible with the surrounding low to medium density developments.

16. Decision Sought

- 16.1 The Board is invited to :
- (a) agree that representations no. **R6618**, **R15008** and **R15038** as mentioned in paragraph 1.2 above are invalid; and
 - (b) give consideration to the valid representations and comments and decide whether to propose/not to propose any amendment to the OZP to meet/partially meet the representations.
- 16.2 Should the Board decide to propose amendment to the OZP to meet/partially meet the representations as detailed in paragraph 8.2 above, the Board is invited to agree that the proposed amendment to the draft Kowloon Tong OZP No. S/K18/18 as shown at **Annex IX**, including amendment to the plan, its Notes and Explanatory Statement, is suitable for publication for further representation in accordance with the provisions of section 6(C)2 of the Ordinance.

Attachments

Annex I	Schedule of Amendments incorporated in the draft Kowloon Tong OZP No. S/K18/17
Annex II-1 to II-40	Representations made by LegCo members, KCDC members, political party, HKBU and concern groups, and samples of some representations in standard letters/emails
Annex II-41 to II-43	Invalid Representations
Annex III-1 to III-7	Comments on representations made by LegCo member, Area Committee member, HKBU and concern groups
Annex IVa	Extract of Minutes of meeting of MPC meeting on 21.12.2012
Annex IVb	Extract of Minutes of meeting of MPC meeting on 25.1.2013
Annex Va	Extract of Minutes of meeting of KCDC HIC on 7.3.2013
Annex Vb	Extract of Minutes of meeting of KCDC HIC on 7.11.2013
Annex Vc	Letter of KCDC HIC on 27.11.2013

Annex Vd	Extract of Minutes of LegCo Panel on Education on 11.3.2013
Annex Ve	Extract of Minutes of LegCo Panel on Education on 10.6.2013
Annex VIa	Summary of Supportive Representations on Amendment Item A
Annex VIb	Summary of Adverse Representations on Amendment Item A
Annex VIc	Major Points of Adverse Representations on Amendment Item A by Representation
Annex VII	Summary of Comments on Representations
Annex VIII	Demand for and Planned Provision of Major GIC Facilities and Open Space in Kowloon Tong
Annex IX	Proposed Amendment to the draft Kowloon Tong OZP No. S/K18/18 (including plan, Notes and Explanatory Statement)
Annex X	CD-ROM containing names of all representers and commenters as well as submission of all representations and comments (for Members only)
Plan H-1	Comparison of the approved Kowloon Tong OZP No. S/K18/16 and the draft OZP No. S/K18/17
Plan H-2	Amendments incorporated on the draft Kowloon Tong OZP No. S/K18/17
Plan H-3	Location Plan of the Representations sites
Plan H-4	Site Plan of the Site
Plan H-5	Site photos of the Site

PLANNING DEPARTMENT
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