

TOWN PLANNING BOARD

**TPB Paper No. 10279
For Consideration by
the Town Planning Board on 19.5.2017**

**CONSIDERATION OF REPRESENTATIONS NO. R1 TO R44
AND COMMENTS NO. C1 TO C34
IN RESPECT OF THE DRAFT HUNG HOM
OUTLINE ZONING PLAN NO. S/K9/25**

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Subject of Representations	Representers (No. TPB/R/S/K9/25-R1 to R44)	Commenters (No. TPB/R/S/K9/25-C1 to C34)
<u>Amendment Item A</u> Rezonning of a site at Lee Kung Street from “Government, Institution or Community” (“G/IC”) to “Residential (Group A)” (“R(A)”) with revision of building height (BH) restriction from 11-storey to 110 metres above principle datum (mPD)	Total: 44 <u>Support Item A (1)</u> R1: Hong Kong Housing Society (HKHS) <u>Oppose Item A (39)</u> R2: Housing and Infrastructure Committee of the Kowloon City District Council (HIC KCDC) R3 to R40: Individuals <u>Provide views/express concern (4)</u> R41 to R44: Individuals	Total: 34 <u>Oppose R1 or Support representations opposing the Senior Citizen Residences Scheme (SEN) development on the Site (R2 to R44) (31)</u> C1 to C31: Individuals [Among these 31 representations, 22 also oppose R2’s proposal to build public housing on the Site C1 to C19, C26, C27, C29] <u>Provide views/express concern (3)</u> C32 to C34: Individuals

Note: A CD-ROM containing names of all representers and commenters as well as their submissions is enclosed at **Annex XII** [for Town Planning Board Members only]. The names of all representers and commenters can be found at the Town Planning Board’s website at http://www.info.gov.hk/tpb/en/plan_making/S_K9_25.html

1. Introduction

- 1.1 On 28.10.2016, the draft Hung Hom Outline Zoning Plan (OZP) No. S/K9/25 (the Plan) (**Annex I**) was exhibited for public inspection under section 5 of the Town Planning Ordinance (the Ordinance). The amendments are set out in the Schedule of Amendments at **Annex II**. A total of 44 representations were received, all of them are related to rezoning of a site at Lee Kung Street for a SEN development by HKHS (Item A) (the Site) (**Plan H-1**). On 24.1.2017 the Town Planning Board (the Board) published the representations for three weeks for public comments and 34 comments were received.
- 1.2 The other OZP amendments that are not subject of the representations are inclusion of ‘Art Studio (excluding those involving direct provision of services or goods)’ as a

Column 1 use in Schedule II for industrial or industrial-office building of the “Other Specified Uses” annotated “Business” zone and some technical amendments to the Notes of the OZP. Also, the two areas designated as Urban Renewal Authority (URA) Chun Tin Street/ Sung Chi Street Development Scheme Plan (DSP) and URA Hung Fook Street/ Ngan Hon Street DSP are excised from the OZP boundary (**Annex II**).

- 1.3 On 24.3.2017, the Board agreed to consider all the representations and comments collectively in one group. This paper is to provide the Board with information for consideration of the representations and comments. A summary of representations and comments and the responses of Government departments is at **Annex IX**. The representers and commenters have been invited to attend the meeting in accordance with section 6B(3) of the Ordinance.

2. **Background**

Elderly Housing Schemes by HKHS

- 2.1 HKHS has implemented different schemes to cater for community’s demand for purpose-built housing for the elderly who can live independently. The project to be implemented on the Site is under the SEN scheme, which is to serve elders aged over 60 of middle income group. The elders that join the SEN scheme are subject to asset means test, and they enter into a ‘long lease arrangement’ by paying an ‘entry contribution’ and monthly management fees. HKHS has completed two pilot SEN projects (i.e. Jolly Place in Tseung Kwan O in 2003 and Cheerful Court in Jordan Valley in 2004). The Government granted sites for the two completed SEN projects at nominal premium. All flats in the said two pilot projects have been leased out and there are applicants on the waiting list. In light of the two SEN projects already completed by HKSH, HKHS’ proposed scheme for the Site as well as the demand for SEN flats for the elderly the Transport and Housing Bureau (THB) has given in-principle policy support to HKHS to undertake the proposed SEN project on the Site.
- 2.2 HKHS has completed another project under their ‘Joyous Living Scheme’ in North Point, the Tanner Hill. The Tanner Hill is an elderly housing project offering 588 independent living residential flats in the form of short-term leases and lease-for-life. That project targets elders of higher income and unlike SEN, there are no asset limits for the applicants. Also unlike the two SEN projects, HKHS paid full market value land premium for the Tanner Hill project that reflect the lease, but not sale, of the housing units to elders aged over 60. HKHS operated the project on a self-financing basis without subsidy from Government.

The Site

- 2.3 The relevant OZP amendment involve the following:

Item A: rezoning of a site at Lee Kung Street from “G/IC” to “R(A)” subject to the same plot ratio (PR) controls as other “R(A)” zones on the OZP i.e. maximum domestic PR of 7.5 or a maximum total PR of 9 for a building that is partly domestic and partly non-domestic. The BH restriction was revised from 11-storey to 110 mPD.

- 2.4 The OZP amendment was agreed by the Metro Planning Committee (MPC) of the Board on 14.9.2016. The relevant MPC Paper No. 15/16 and the minutes of the MPC meeting are deposited at the Board's Secretariat for Members' inspection. The MPC Paper and the minutes are also available at the Board's website.
- 2.5 The notional scheme submitted by HKHS in support of the rezoning is in **Annex XI**. The notional SEN scheme is at PR of 8.49 (7.44 for domestic and 1.05 for non-domestic) with BH of 110mPD. It will comprise a 28-storey domestic tower with 305 SEN flats built over a 4-storey podium that will accommodate elderly facilities including rehabilitation centre, medical centre and a residential care home for the elderly (RCHE) (58 bed spaces). Various technical assessments were conducted by HKHS to support rezoning the Site, and submitted to the MPC for their consideration of the proposed amendment to the OZP on 14.9.2016. A full set of all technical assessments - traffic impact assessment (TIA), air ventilation assessment (AVA), environmental assessment (EA), visual appraisal, water supply impact assessment and drainage impact assessment are deposited at the Board's Secretariat for Members' inspection.

3. Public Consultation

- 3.1 Prior to submission of the proposed OZP amendments to MPC for consideration, HKHS together with the Planning Department (PlanD) consulted the HIC KCDC on 4.6.2015 regarding the proposed SEN project. There were both Members supporting and objecting to the project. The relevant extract of the minutes of the meeting is at **Annex III**.
- 3.2 In June 2016, HKHS provided a written reply to HIC KCDC dated 15.6.2016 and attended the meeting on 23.6.2016 to further brief the HIC KCDC members on the project (**Annexes IVa and IVb**). After that meeting, the HIC KCDC wrote to the Board indicating that a number of Members objected to the SEN project and requested that the Site be used for building public housing (**Annex V**). The minutes and submissions mentioned above were submitted to MPC for consideration together with the proposed OZP amendments on 14.9.2016.
- 3.3 Upon publication of the draft OZP, the HIC KCDC was consulted on 3.11.2016. HIC KCDC Members raised similar concerns on the SEN project. The relevant extract of the minutes of that meeting is at **Annex VI**. The HIC KCDC submitted a representation (**R2**) indicating that some members objected to rezoning the Site for SEN and suggested that the Site be used for building public housing.

4. The Representations

4.1 Subject of Representations (Plan H-2a)

4.1.1 A total of 44 representations were received on Item A as follows:

- (a) **R1** from HKHS supports Item A;
- (b) **R2** from HIC KCDC and **R3** to **R40** from individuals (including 11 residents of La Lumiere at 9 Lee Kung Street to the northeast of the Site

(**Plan H-3**) and a resident of Tsing Chau Street Customs Staff Quarters to the north of the Site) (39 nos.) oppose Item A; and

- (c) **R41 to R44** from individuals (including 1 resident of La Lumiere) (4 nos.) provide views/express concerns on Item A.

4.1.2 The samples of representation submissions are at **AnnexVII** for reference. A full set of the representations are available in the CD-ROM at **Annex XII** [for Town Planning Board Members only]. A full set of hard copy is also deposited at the Secretariat of the Board for Members' inspection.

4.2 Major Grounds of Representations and Representers' Proposals

Supportive Representation (1)

4.2.1 **R1** (submitted by HKHS) support Item A based on the following grounds:

- (a) there is strong demand for purpose-built elderly housing, and the two SEN projects at Jolly Place and Cheerful Court have 100% occupancy. There are currently more than 720 applicants on the waiting list with estimated average waiting time of 5 years;
- (b) HKHS has commissioned the University of Hong Kong to conduct a study on 'A Comprehensive Study on Housing in an Ageing Community' (the SEN Study) which indicates that the demand for SEN would be 191,000 units in 2016, 213,000 units in 2021, 219,000 units in 2031, and 213,000 units in 2041. There are only 576 SEN units in Cheerful Court and Jolly Place. The projected demand for SEN units will far exceed the potential supply. The SEN Study considered that there is potential demand for SEN in Kowloon City, as based on the 2011 Census data, there is a high percentage of elderly households in Kowloon City who are owner-occupiers with no outstanding mortgage loan and these are potential SEN applicants from HKHS' experience;
- (c) SEN is another type of subsidized housing scheme providing alternative housing option for elderly tenants, e.g. those elders living in public rental housing with improved economic ability; and those elders residing in private old buildings without elevators or barrier free access;
- (d) according to the SEN Study, less than 50% of the respondents aged 60 or above showed desire to live with their children. SEN caters for the elder's increasing desire to move out and live either with their spouse or alone;
- (e) SEN development serves the local community by providing day care center, rehabilitation centre and RCHE facilities to support the local residents to age in their own community;
- (f) HKHS has conducted various technical assessments on visual, landscape, air ventilation, traffic, environment, sewerage and water supply impacts for the SEN project on the Site. With the proposed mitigation measures, the SEN development will not cause significant

impact to the local areas and there will be no negative impacts on the future SEN residents; and

- (g) the proposed SEN project adds variety to the subsidized housing supply, catering for the needs of different age cohort and income segment in the community.

Adverse Representations (39)

- 4.2.2 The major grounds of the 39 representations (**R2** to **R40**) opposing the rezoning of the Site and their proposals are summarized below. For specific grounds of each representation, please refer to **Annex IX**:

“R(A)” Zoning or Residential Use on the Site

- (a) there are too many residential sites in the area, some of them have new developments (such as La Luminere) and others are planned for redevelopment. There is no need for additional residential sites in the area; instead the Government should focus on developing new towns and large-scale residential communities and not develop ‘in-fill’ sites;

Development of SEN

- (b) it is questionable whether the SEN project will benefit the community as a whole. Demand for such SEN residences is low as seen in HKSH’s elderly residence project in North Point (i.e. the Tanner Hill) that was not well received. HKHS should consider building the SEN project on other sites in Hung Hom, nearby districts, New Territories or new development areas;

BH Restriction, Visual and/or Air Ventilation Aspects

- (c) relaxation of BH restriction from 11 storeys to 110mPD for the development will adversely affect the surrounding built environment. The development will block the views of adjoining residential buildings and has a detrimental visual impact in the area. The associated wall effect of the development will block air ventilation and aggravate air quality in the area;

Environmental Aspect

- (d) the high-rise SEN development will aggravate noise pollution and disturbance and reduce sunlight penetration in the area. Moreover, it will detrimentally affect the living quality/environment of existing residences. The elders living in the SEN development will suffer from noise and psychological impacts from the nearby fire station as well as traffic noise from the nearby roads. Air quality in the district is not suitable for the elders;

Traffic Aspect

Traffic Impacts

- (e) Lee Kung Street is a narrow street and cannot cope with the additional traffic generated from the SEN development. Traffic congestion, illegal parking and accident at Lee Kung Street are likely to occur. Besides, the traffic conditions along Ma Tau Wai Road, Fat Kwong Street and/or Tsing

Chau Street will also deteriorate;

Access for Fire Engines

- (f) traffic from the development will affect access for fire engines to/from the neighbouring Fire Station at Lee Kung Street. This will affect safety of residents in the area;

Parking Provision

- (g) the Site is currently used as temporary public car park and should be retained for car park use. Developing the Site to SEN units will aggravate the current car parking shortage situation;

Infrastructure

- (h) the basic infrastructure in the area cannot cope with the increased population in the SEN and other residential developments in the area;

Open Space and Government Institution and Community (GIC) Facilities

- (i) too many high-rise residential buildings are located in the area but there are inadequate GIC facilities in the vicinity to serve the district. The Site should be reserved for open space/garden or sports, culture and recreational facilities;

Proposals

- (j) the main proposals of the representers are:
 - (i) the Site should be reserved for public housing to shorten the waiting list and to meet the pressing needs for public housing;
 - (ii) to retain the original BH restriction of 11 storeys;
 - (iii) to retain the Site for GIC use or provide community facilities (e.g. community centre, library) and social welfare facilities (e.g. elderly facilities); and
 - (iv) to develop multi-storey car park at the Site.

Representations that Provide Views/Express Concerns (4)

- 4.2.3 The major views of the 4 representations (**R41 to R44**) providing views/expressing concerns and their proposals are similar to those above, e.g. opposing residential use on the Site, traffic concerns, and adverse visual and air ventilation impacts of relaxation of the BH restriction. Their proposals included retaining the BH restriction of 11 storeys; to retain the Site for GIC use; and develop the Site for open space/garden or provide sports, culture and recreational facilities; and/or to retain the car park use of the Site.

5. Comments on Representations

- 5.1 A total of 34 comments (**C1 to C34**) were received from individuals (including 8 residents of La Lumiere). The samples of comments submissions are included in **Annex VIII** for reference. A full set of the comments are available in the CD-ROM

at **Annex XII** [for Town Planning Board Members only]. A full set of hard copy is also deposited at the Secretariat of the Board for Members' inspection.

5.2 The main grounds and proposals of the comments are as follows:

- 5.2.1 **C1 to C31** oppose **R1** and support all representations opposing the SEN development (**R2 to R40**) on similar grounds and proposals as those of the representations outlined in paragraph 4.2.2 above (see **Annex IX** for the specific grounds and proposals of each comment).
- 5.2.2 In addition, **C1 to C19, C26, C27** and **C29** oppose **R2's** (HIC KCDC) proposal of building public housing on the Site, and their grounds are that the Site is too small and it will not be cost effective for public housing development; the public housing development will aggravate traffic congestion, affect surrounding environment and air quality; and it is not in line with original planning intention for GIC use on the Site. Some comments considered that public housing should be built in other areas (e.g. Kai Tak), new towns, country park and/or larger sites.
- 5.2.3 Some comments opposed the representers' proposal of building a car park on the Site on grounds of the limited road capacity and traffic congestion; the area is well served by public transport and a car park development will aggravate air and noise pollution.
- 5.2.4 Some comments propose to restrict the BH of the Site without specifying a particular BH.
- 5.2.5 **C32 to C34** do not relate to any representation. However, they indicate objection to the SEN development as it will increase population in the area, and have adverse impacts on the environment, sunlight exposure, air ventilation and traffic infrastructure.

6. **Planning Considerations and Assessments**

6.1 **Representation Site and Its Surroundings**

(Plans H-1 to H-4)

- 6.1.1 The Site (about 1,680m²) is bounded by Lee Kung Street and Fat Kwong Street to its north and south respectively. It was previously occupied by the Fire Services Department Married Quarters and is currently used as a temporary public vehicle park.
- 6.1.2 The Site is located in a predominantly residential area mixed with open spaces and GIC facilities. To the immediate east are the Hung Hom Fire Station and Fat Kwong Street sitting-out area; to the immediate north across Lee Kung Street is the Tsing Chau Street Customs Staff Quarters. The Hung Hom Gardens and La Lumiere are located to the northeast of the Site. Further north are mainly GIC and residential developments. To the immediate west are Fat Kwong Street Gardens Nos. 1 and 2; and to the south across Fat Kwong Street Flyover is Ka Wai Chuen, and a public housing estate of HKHS.

Further south is the old residential core of Hung Hom.

6.2 Planning Intention

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

6.3 Responses to Grounds of Representations and Representers’ Proposals

Supportive Representation

Item A

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

Adverse Representations

“R(A)” Zoning or Residential Use on the Site

6.3.2 The Site was zoned “G/IC” on the previous OZP to reflect the ex-Fire Services Department Married Quarters use on the Site. The quarters building was demolished around 2007 and the Site has been used as a temporary public car park under short term tenancy (STT) since 2011. As the Site is no longer required for government staff quarters or other GIC uses, it should be rezoned for alternative long term uses to optimize land resources. When considering the OZP amendments on 14.9.2016, MPC noted that HKHS has conducted technical assessments to demonstrate that the Site is suitable for a SEN development and that the SEN development will not create adverse impacts on the surroundings with suitable mitigation measures. The Site falls within a residential neighborhood with GIC and open space uses. In view that the Site was previously for domestic government quarters use and the surrounding residential sites are all zoned “R(A)”, the “R(A)” zoning on the Site is considered compatible with the surrounding environment.

6.3.3 On the views that Government should focus on developing large scale communities rather than ‘in-fill’ sites, as land resources is scarce and precious, the Government has adopted a multi-pronged approach to optimize available land resources with due regard to relevant planning and technical considerations to satisfy needs for different kinds of housing in both the current built-up area and new development areas. The Site is a piece of government land readily available for development.

Development of SEN

6.3.4 HKHS pointed out that there is 100% occupancy of the 576 SEN units in the two SEN projects by HKHS, and there are currently more than 720 applicants on the waiting list with estimated waiting time of 5 years on average. Having considered the two completed SEN projects by HKSH, HKHS’ proposed scheme for the Site as well as the demand for SEN flats for the elders, THB has given support to the SEN development on the Site.

- 6.3.5 With regard to some representers' views that demand for such SEN residences is low in view of the low take-up for the Tanner Hill project in North Point, HKHS has explained in previous HIC KCDC meetings that the Tanner Hill project was developed under their 'Joyous Living Scheme' that targeted at higher income elders with no asset limits. The SEN scheme, proposed to be developed on the Site, is different from the Tanner Hill project in that it is to serve elders of middle income group who will be subject to asset means test.
- 6.3.6 Regarding the views that SEN housing should be developed in other sites in Hung Hom, the Site is a piece of readily available government land that could be optimized to satisfy need for SEN and other sites for SEN can be explored separately in future.

BH Restriction, Visual and/or Air Ventilation Aspects

BH Restriction and Visual Aspect

- 6.3.7 The BH restriction of the Site was revised from 11 storeys under the previous "G/IC" zone to 110mPD under the "R(A)" zone. The previous 11-storey BH restriction was to reflect the pre-dominant BH of the "G/IC" zone covering the the Site and the adjacent fire station (**Plan H-1**). In order to optimize the utilization of the Site for the intended residential development, it is necessary to relax the BH restriction.
- 6.3.8 Due to noise and air impacts from the adjacent Fat Kwong Street Flyover, domestic uses for any development with openable window should not be located below 31.4mPD, hence the first residential floor of the development has to be raised to that level (**Drawing 1** in **Annex XI**). Besides, a 5m-setback from Lee Kung Street and 10m-setback from Fat Kwong Street are required by the Director of Environmental Protection (DEP) to ensure adequate buffer distance from abutting roads from air quality impact perspective. As a result, the developable area of the Site and building footprint will be restricted, a BH of 110mPD is required to accommodate the permitted PR for the "R(A)" zone due to said development constraints of the Site.
- 6.3.9 The BH of 110mPD is generally compatible with the BH restrictions for residential zones in the vicinity i.e. 100mPD to 120 mPD. The "R(A)" zones within the subject street block and Ka Wai Estate to its south are subject to BH restriction of 100mPD whilst an "R(A)" zone further east of Ma Tau Wai Road is subject to BH restriction of 120mPD (**Plan H-1**).
- 6.3.10 As the Site is located within a street block (between Lee Kung Street and Fat Kwong Street) previously with GIC facilities and currently with open car park use with generally more open view, the proposed development will alter the open views for local stakeholders which is inevitable when there is more intensive development on the Site. As reflected in the Visual Appraisal conducted by HKHS, there will be some visual impacts, such as reduction in visual openness and permeability, as a result of the rezoning with an increase in BH (**Drawings 13 to 15** in **Annex XI**). The VA concluded that the proposed SEN development will cause slightly adverse visual impact to the environment. To alleviate the visual impact, HKHS will incorporate design

mitigation measures including appropriate building footprint to reduce visual obstruction; suitable height profile to appear less visually intrusive; adoption of building finishes in recessive or neutral colours; setting back of the tower from Fat Kwong Street and provision of landscaped area/planting in the southern portion of the podium, green roofs and vertical greening to mitigate visual impact of building.

Air Ventilation

- 6.3.11 According to the AVA Expert Evaluation prepared by HKHS and submitted for MPC's consideration, the Site is situated in a built-up urban area in which the annual and summer prevailing winds are sheltered by existing developments and elevated structures. According to the AVA report, the Site does not encroach into any air paths in the area. A number of mitigation measures in terms of stepping podium; setting back of the residential block from Fat Kwong Street; provision of 4.5m-high open landscaped area between the first residential floor and the podium; alignment of building block in east-west direction; and provision of a 5m-high opening at the driveway and car park areas on ground floor are proposed to minimize the potential impact for the wind from southwest and southeast directions during summer (**Drawings 1 to 4 in Annex XI**). These mitigation measures are stated in paragraph 8.3.11 of the Explanatory Statement of the OZP. Implementation of these mitigation measures will be governed through conditions of the private treaty grant. HKHS has also undertaken that in the event alternative mitigation measures are to be implemented in the future scheme, a quantitative AVA will be conducted to ascertain that the future scheme will not perform worse than the notional scheme assessed in the AVA.

Environmental Aspects

- 6.3.12 According to the EA prepared by HKHS and submitted to MPC for consideration, insurmountable environmental impacts are not anticipated from the proposed SEN project with implementation of recommended mitigation measures.
- 6.3.13 According to the EA, to mitigate noise impact, measures (including adoption of building setback to increase buffer distance from Fat Kwong Street and appropriate building layout/orientation, end wall with blank façade facing the noise source, and provision of fins and acoustic windows to further reduce noise level, etc.) are proposed. The EA concluded that future residents will not be subject to adverse traffic noise impact.
- 6.3.14 The first residential floor is raised to 31.4mPD as one of the mitigation measures to locate air sensitive receivers (i.e. potential residents of the domestic units) to higher floors and minimize impact of traffic noise from Fat Kwong Street. To mitigate possible air and noise impacts to the other elderly facilities in the podium, e.g. the RCHE, air conditioning system will be provided at these floors such that they will not rely on openable window for ventilation.

Traffic Aspects

Traffic Impact

6.3.15 The Site is served by well connected road network and public transport. The MTR Ho Man Tin Station of the Kwun Tong East Line is in the vicinity. There are a number of bus/mini-bus routes operating along Fat Kwong Street providing services to various other railway stations. The Commissioner for Transport (C for T) commented that according to the TIA, the traffic generation/attraction of the development site at Lee Kung Street is insignificant and thereby will not have adverse traffic impact on the nearby road network. Ancillary parking spaces and loading/unloading facilities will be provided in the development to meet its own demand.

Access of Fire Engines

6.3.16 Some representers indicated that the SEN development will affect access for fire engines. However, the run in/out of the adjacent fire station is located at Fat Kwong Street, whereas the run in/out of the SEN development is at Lee Kung Street. The ingress/egress traffic from the SEN development is unlikely to affect access for fire engines. The Director of Fire Services (D of FS) has not raised any concerns in this regard.

Parking Provision

6.3.17 The current STT public car park on the Site is a temporary use which should be terminated upon permanent development in accordance with the planning intention for the Site and retention of this use does not optimize land resources. C for T advised that in view of the limited size of the site, the efficiency of the use of space as multi-storey car park is fairly low. There are **two nearby** public car parks **at Peninsula Square and the Zung Fu car park building which are located** within 500 meters of the **representation site.** ~~development project, including the Peninsula Plaza and Renfu Parking Building.~~ In view of the above, C for T has reservation on using the site as a multi-storey car park.

Infrastructure

6.3.18 HKHS has conducted water supply impact assessment and drainage impact assessment for the SEN development which concluded that the proposed SEN development will not result in any adverse impacts on infrastructural capacity in the area.

Open Space and GIC Facilities

6.3.19 Taking into account the proposed SEN development at the Site (with an estimated population of about 2,300) and other residential developments in the area under construction/planning, the planned population of the OZP area is estimated to be about 155,150 persons. Based on the planned population and the requirements of HKPSG, the provision of open space and major GIC facilities in the area is generally sufficient (**Annex X**). It is estimated that local open space will have a surplus of 1.33ha and district open space (DO) will have a deficit of 1.61 ha. For the slight deficit of DO in Hung Hom area, it should be noted that DO is intended to serve the population of a district and should be assessed on a district basis. For Kowloon City District where the Site is located, there is a surplus of DO land of about 55 ha. For sports ground and classrooms of primary and secondary schools, they are generally

assessed and provided on a wider district basis by the concerned departments. The concerned departments, including the Director of Leisure and Cultural Service (DLCS), the Director of Food and Environmental Hygiene (DFEH) and District Officer (Kowloon City), Home Affairs Department (DO(KC), HAD) have no request to reserve the Site for GIC and leisure/sports venue uses.

Proposals

6.3.20 Regarding the proposal in paragraph 4.2.2 (j)(i) to reserve the Site for public housing, whilst recognizing a strong overall demand for public housing, there is also a need to provide land to satisfy different kinds of housing needs. To address the demand for housing, the Government has committed to an overall target of providing 460,000 units in the coming 10 years, with 60% for public housing. The 2017 Policy Address has identified 25 additional potential residential sites that is targeted to provide a total of around 60,000 flats, of which 80% (i.e. around 48,000 flats) will be for public housing to address the territorial demand. For the Kowloon City district, a number of new sites including the sites at Sheung Lok Street, Sung Wong Toi Road, Ko Shan Road and four “R(A)” sites in Kai Tak development have been earmarked for public housing development.

6.3.21 Regarding the proposals in paragraph 4.2.2 (j)(ii) to (iv), the responses in paragraph 6.3 above are relevant.

Representations Providing Comments

6.3.22 The grounds of **R41 to R44** that provided views/expressed concerns on rezoning of the Site are similar to those of the adverse representations in paragraph 4.2.2 above, and the responses in paragraph 6.3 above are relevant.

6.4 Responses to Grounds and Proposals of Comments

The grounds and proposals of the comments are similar to those of the adverse representations and the responses in paragraph 6.3 above are relevant. Regarding the views opposing the proposal of building public housing on the Site, the response in paragraph 6.3.20 above is relevant. Detailed responses to the comments are at **Annex IX**.

7. Departmental Consultation

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

- (a) District Lands Officer/Kowloon West, Lands Department;
- (b) C for T;
- (c) Chief Building Surveyor/Kowloon, Buildings Department;
- (d) Commissioner of Police;
- (e) Chief Highway Engineer/Kowloon, Highways Department;
- (f) DEP;
- (g) Director of Housing;
- (h) Chief Engineer/Mainland South, Drainage Services Department;

- (i) Chief Engineer/Construction, Water Supplies Department;
- (j) Head (Geotechnical Engineering Office), Civil Engineering and Development Department;
- (k) DLCS;
- (l) DFEH;
- (m) Director of Social Welfare;
- (n) D of FS;
- (o) DO(KC), HAD; and
- (p) Chief Town Planner/Urban Design & Landscape, PlanD.

8. Planning Department's Views

- 8.1 The supportive view of **R1** and comments/views of **R41** to **R43** on Item A is noted.
- 8.2 Based on the assessments in paragraph 6 above and for the following reasons, PlanD does not support **R2** to **R40** and considers that the Plan should not be amended to meet the representations:
- (a) land suitable for housing development in Hong Kong is scarce and there is a need for optimizing land available to meet different housing needs. The Site is considered suitable to be rezoned "Residential (Group A)" to meet the need for SEN development;
 - (b) the proposed SEN development at the representation site with appropriate building height restriction and suitable mitigation measures would not generate unacceptable adverse impacts on the surrounding areas in terms of traffic, environmental, visual, air ventilation and infrastructural aspects (**R3 to R9, R12 to R31, R33 to R40**);
 - (c) the proposed development at the representation site will be accessible via Lee Kung Street which will not affect the access of fire engines to the adjacent Fire Station via Fat Kwong Street (**R14, R20 and R30**); and
 - (d) there is sufficient provision of open space and Government, Institution and Community (GIC) facilities to serve the local residents and the representation site is not required to be reserved for GIC, open space or car parking use (**R5 to R11, R13 to R16**);

9. Decision Sought

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

10. Attachments

Annex I	Draft Hung Hom OZP No. S/K9/25 (reduced size)
Annex II	Schedule of Amendments to the Approved Hung Hom OZP No. S/K9/24
Annex III	Extract of Minutes of the HIC KCDC Meeting held on 4.6.2015
Annex IVa	HKHS's reply to HIC KCDC dated 15.6.2016
Annex IVb	Extract of Minutes of the HIC KCDC Meeting held on 23.6.2016
Annex V	Letter of HIC KCDC dated 25.8.2016
Annex VI	Extract of Minutes of the HIC KCDC Meeting held on 3.11.2016
Annex VII	Samples of Representations Submissions
Annex VIII	Samples of Comments on Representations Submissions
Annex IX	Summary of Representations and Comments and Government Departments' Responses
Annex X	Provision of Open Space and Major GIC Facilities in Hung Hom Planning Area
Annex XI	Notional Scheme of SEN submitted by HKHS
Annex XII	CD-ROM containing names of all representers and commenters as well as submission of all representations and comments [<i>TPB Members only</i>]
Plan H-1	Comparison Between Previous and Current Zoning
Plan H-2a	Location Plan of the Representation Site
Plan H-2b	Aerial Photo of Representation Site
Plan H-3	Site Plan of Representation Site
Plan H-4	Site Photos

PLANNING DEPARTMENT
MAY 2017