

Recommended Advisory Clauses

- (a) to note the comments of the Commissioner for Harbourfront, Development Bureau that the proposal should not adversely affect the vibrancy, attractiveness and accessibility of the prime waterfront location.
- (b) to note the comments of the District Lands Officer/Kowloon West, Lands Department (LandsD) that:
- (i) the subject premises (the Premises) falls within Kowloon Inland Lot No. 9844 (the Lot), which is held under Conditions of Exchange No. 11172 dated 23.12.1977 as varied or modified by seven Modification Letters dated 2.5.1978, 31.1.1980, 25.7.1996, 10.10.1998, 18.4.2008, 20.4.2022 and 23.4.2025 (collectively referred to as the Conditions). The Conditions contain, *inter alia*, the following salient special conditions:
 - i. non-industrial purpose as shown on the Master Plans, which shall not be amended without the written consent of LandsD;
 - ii. development in accordance with Master Plans;
 - iii. maximum gross floor area (GFA) of 324,078m², under which not less than 145,000m² shall be used for hotel purposes;
 - iv. parking and loading/unloading (L/UL) requirements for residents or occupiers of the buildings erected on the Lot;
 - v. delineate buildings for hotel use as “Hotel Portion” under the Conditions; and
 - vi. restriction of alienation of the Hotel Portion, except as a whole.
 - (ii) the Lot owners have to apply to LandsD for (1) consent to amend the approved Master Plans under the Conditions, (2) approval to amend the delineation of the Hotel Portion under the Conditions, and (3) a lease modification to accurately reflect the intention of designating the concerned parking spaces and L/UL bay solely for residential use. This modification would ensure that such spaces and bay are reserved exclusively for residential purposes, thereby excluding use by buildings for non-industrial purposes (other than residential);
 - (iii) there is no guarantee that the application(s) for consent / approval / lease modification, if received, will be approved by LandsD. Such application(s) will be considered by LandsD acting in the capacity as the landlord at its sole discretion. If the application is approved, it would be subject to such terms and conditions as imposed by the Government, including payment of premium and administrative fee;
 - (iv) the application proposes to convert 33,358m² of existing hotel GFA to residential use. The calculation of the GFA will be examined in detail during the general building plans submission stage. If the resultant GFA arising from the proposed conversion does not

comply with the restrictions under the Conditions, a lease modification to modify the GFA restriction will be required, and the comment above shall apply;

- (v) the Lot is currently under multiple ownership by way of undivided shares. It is noted that the application is submitted by one of the three owners of the Lot. The applicant together with the other two owners of the Lot will have to apply jointly to LandsD for the consent / approval / lease modification;
 - (vi) regarding the upgrading works for the pedestrian crossing at the junction of Salisbury Road and Chatham Road South falling outside the Lot proposed by the applicant, it should be followed up by the applicant separately with the Transport Department (TD) and Highways Department (HyD) outside land document. LandsD reserves their comments if it is the otherwise; and
 - (vii) there are several reports on technical assessments attached to the planning application. The applicant is required to complete these assessments and implement the mitigation measures, if any, to the satisfaction of the concerned departments.
- (c) to note the comments of the Commissioner for Transport that:
- (i) the existing mechanical car parking spaces at Level B4 of the Lot shall be utilised. A proportion of not less than 21% (189/887) of the total number of the existing mechanical car parking spaces at Level B4 of the Lot shall be allocated to the car parking spaces for residential use, unless otherwise agreed by TD. The detailed allocation and revised carpark layout plan shall be submitted to TD for approval in the subsequent stages before the conversion; and
 - (ii) a detailed operation and management plan for opening up four L/UL bays for the use as picking-up/dropping-off for tourist coaches shall be submitted to TD for approval in the subsequent stages before the conversion.
- (d) to note the comments of the Chief Building Surveyor/Kowloon, Buildings Department (BD) that:
- (i) the total GFA should be comprehensively reassessed. The GFA concession granted to be existing service apartment under Building (Planning) Regulations 23A is not applicable to the proposed residential use;
 - (ii) all building works are subject to compliance with the Buildings Ordinance (BO). Detailed comments under the BO will be given at the building plans submission stage;
 - (iii) an Authorized Person should be appointed as the coordinator for the proposed building works in accordance with the BO; and
 - (iv) Practice Notes for Authorized Persons, Registered Structural Engineers and Registered Geotechnical Engineers (PNAP) APP-152 on Sustainable Building Design Guidelines is applicable to the proposal. The applicant should ensure compliance with the requirements under the PNAP APP-152, including the site coverage (SC) of greenery.
- (e) to note the comments of the Chief Town Planner/Urban Design and Landscape, Planning

Department that:

- (i) some of the proposed “enhancements of greenery” may fall outside the Premises (i.e. greenery on 7/F and G/F waterfront). Comments and approval from the relevant authority on the proposed “enhancements of greenery” should be sought, where appropriate;
 - (ii) approval of the planning application under Town Planning Ordinance does not imply approval of tree preservation/removal scheme under lease. Comments and approval from the relevant authority on the concerned tree works and/or compensatory/replacement planting proposal should be sought, where appropriate; and
 - (iii) approval of the planning application does not imply approval of the SC of greenery requirements under BD’s PNAP APP-152 and/or under lease. The SC of greenery calculation should be submitted separately to BD for approval.
- (f) to note the comments of the Director of Fire Services that:
- (i) detailed fire safety requirements will be formulated upon receipt of a formal submission of general building plans or referral of application via relevant licensing authority; and
 - (ii) the provision of emergency vehicular access in the captioned work shall comply with the standard as stipulated in Section 6, Part D of the Code of Practice for Fire Safety in Buildings 2011, which is administered by BD.
- (g) to note the comments of the Chief Highway Engineer/Kowloon, HyD that:
- (i) the roadworks mentioned in the proposal, including the proposed signalised pedestrian crossing at Salisbury Road/Chatham Road South, shall be completed by the applicant as its own cost in accordance with Transport Planning and Design Manual and relevant standards of HyD; and
 - (ii) detailed design of the proposed roadworks, including the proposed layout, modification of street furniture, road drains and street light (if any), as well as the proposed management and maintenance arrangement should be submitted to TD and HyD for comments and acceptance.

就規劃申請/覆核提出意見 Making Comment on Planning Application / Review

參考編號
Reference Number: 251205-190311-91093

提交限期
Deadline for submission: 05/12/2025

提交日期及時間
Date and time of submission: 05/12/2025 19:03:11

有關的規劃申請編號
The application no. to which the comment relates: A/K1/273

「提意見人」姓名/名稱
Name of person making this comment: 先生 Mr. Mike Han

意見詳情
Details of the Comment :

As a family office professional deeply invested in Asia Pacific and MENA, we wish to express our strong support for the application.

Victoria Harbor stands as a symbol of Hong Kong's dynamic spirit and global appeal. With Hong Kong's real estate market characterized by scarcity, it is now highly challenging to find attractive upscale apartments in convenient locations while meeting the needs of UHNWIs and family offices.

This proposal blends contemporary luxury with the harbour's beauty, notably in the prime locations in Kowloon. In particular, those seeking a long-term primary or secondary residence wish to integrate into the local community, its shops, restaurants and cultural offerings. K11 is indeed the desirable setting, while giving residents control over a scarce, irreplaceable resource. Indeed, for a family office, wealth is not only financial. It's about reputation and legacy. Staying in a beautifully designed landmark on a premier site enhances the family's standing as stewards of the community.

We urge approval of this proposal to offer more long-term stay options and create a more vibrant scene for Hong Kong's family office businesses.

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tpbpd/PLAND

寄件者: [REDACTED]
寄件日期: 2025年12月05日星期五 12:31
收件者: tpbpd/PLAND
主旨: A/K1/273 K11, Artus, 18 Salisbury Road, TST
類別: Internet Email

A/K1/273

Kowloon Inland Lot No. 9844 (Part), K11, Artus, 18 Salisbury Road, Tsim Sha Tsui

Site area: 33,358 m2

Zoning: "Commercial (7)"

Applied development: Conversion of Existing Hotel for Flat Use 205 Units // 209 Vehicle Parking

Dear TPB Members,

Strong Objections. It is common knowledge that NWD is in financial straits and is selling off the family silver in an attempt to reduce its debt burden.

However, the financial exigencies of the developer are no justification to approve the application which is not in the public interest.

Applicant is selective with data

"The Government has endeavoured to position Hong Kong as a leading destination for wealth and asset management. Echoing the trends set by other major global cities, there is a rising demand in Hong Kong from family offices, business leaders and top talents for residences in the vibrant heart of the Central Business District."

Central Business District is on HK Island. In the 1990's the then plan was that TST would be the second CBD. However, that vision never materialized and this role was supplanted by "**Hong Kong's CBD2** is the transformation of Kowloon East into a second Core Business District to support Hong Kong's economic development."

Currently the administration's focus is on transforming the TST East waterfront into a marina that will attract mega yachts, and with them a strong demand for suite style temporary accommodation close by.

While the occupancy rate data for K11 Artus is not publicly available, it was reported in 2022 that it had a "nearly full occupancy rate over the past year" following a recovery from the pandemic. The

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conversion would clearly lead to a shortfall to meet the demand for service suites as Rosewood Residences – 186 units also reports strong occupancy rates.

The applicant refers to plans to build a mixed-use tower on the Hung Hom waterfront that will include residences. However, this project has not gone through the process and there will no doubt be an application to rejjig the zonings in order to accommodate the planned uses. The zoning of Victoria Dockside on the other hand is already designated as “Commercial”.

Another misleading statement”: *“longer-term accommodation as opposed to solely transient occupancy, a consistent flow of residents and visitors at various times throughout the day will be ensured. This will further strengthen the planning intention of the “C” zone by providing robust support to the vitality of commercial developments, including shops, services, places of entertainment, eating places and hotel services”*

It is an indisputable fact that tourists spend and consume more in a shorter time frame, note the queues for the stores on Canton Road.

And Table 5.3 Hotels with Long-stay Accommodation in Tsim Sha Tsui

The majority of the hotels listed, and I have stayed at a number of them, provide only regular, and often quite small, hotel rooms. They do not offer the type of de-luxe service apartment accommodation that attracts wealthy visitors.

And Table 5.1 Approved Planning Applications involving ‘Flat’ Use in “Commercial” Zones in Tsim Sha Tsui is scraping the barrel:

22 May 2015: Nos. 68, 68A, 70, 70A, 72, 72A, 72B and 72C Kimberley Road, Tsim Sha Tsui “C” Proposed Flat and Permitted Shop and Services / Eating Place Uses (A/K1/244)

This development did not materialize. Instead, Henderson built a commercial tower that it flogged to Chen Zhi, the “Cambodian” King of Scams, currently on the run. His local assets, including this development, have been frozen. The revelation that it is the address for the HK registered companies of his Prince Group explains why the tower appeared to be unoccupied since it was built. That residents were ‘persuaded’ to move out to facilitate the acquisition of the units for redevelopment contributes to the infamy of this address.

12 Jan 2024: 43-49A Hankow Road, Tsim Sha Tsui, Kowloon “C(6)” Proposed Flat with Permitted Office, Shop and Services and Eating Place Uses (A/K1/269)

This is a small site on a side street, the facilities will be basic.

Far more relevant applications are not mentioned:

A/K9/282 (Harbourfront Horizon All-suite Hotel)

Kowloon Inland Lot No. 11110, 8 Hung Luen Road, Hung Hom

Site area: About 20,364sq.m

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Zoning: "Commercial (2)"

Applied development: 1665 Units / PR 5.1 / 60mPD / OS 4,662sq.m / 272 Vehicle Parking

738th MPC MEETING ON 15.03.2024

After deliberation, the Committee decided to reject the application.

The reason was: "the proposed development is not in line with the planning intention of the "Commercial" zone, which is primarily for commercial developments with the application site serving as a hotel node extended from Tsim Sha Tsui East. There is no strong planning justification in the submission for a departure from such planning intention."

A/K9/284 WITHDRAWN

Harbourview Horizon Suites, Kowloon Inland Lot No. 11103, 12 Hung Lok Road, Hung Hom

Site area: About 9,940sq.m

Zoning: "Commercial (3)"

Applied development: 3 Blocks / 1,375 Flats / 546 Room Hotel / Shop and Services and Eating Place/ PR 11.41 / 105mPD / 4,209sq.m OS / 213 Private Parking / 308 Public Parking / 27 Goods Parking / MR GFA for Public Car/Lorry Park

Parking:

For local residents the conversion to permanent residencies, note each one with an entitlement to a parking space, is problematic. The allocation of spaces is many times that required for service apartments.

The parking facilities at Victoria Dockside provide 866 private carparking spaces, 64 loading/unloading bays for tourist buses, trucks or lorries and 6 loading/unloading bays for goods vehicles within the lot under the lease.

The applicant states that "*Based on the occupancy data record from March 2024 to February 2025, the Victoria Dockside has a **spare capacity** of 270 carparking spaces.*"

Members should question the veracity of this statement. Despite the large number of spaces, the FULL sign is often displayed at the entrance, especially at weekends. This results in extensive illegal parking on Salisbury Road, mostly coaches, double parking on Middle Road and illegal parking alongside the bus station on Chatham Road South. Perhaps in acknowledgement of the shortfall in the provision, there appears to be little enforcement taking place. Sometimes vehicles park close to the junction of Salisbury and Chatham Road South leaving little room to navigate for buses and coaches turning left onto Salisbury.

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The increase in the number of events planned for the waterfront will put further pressure on the already inadequate parking provision in the district.

There is also the issue of the financial instability of NWD to be considered. If the conversion were to go ahead the units would be sold. This would create a conundrum for the purchasers if the development itself has to be liquidated. It would be prudent that the facilities remain under a single ownership.

In Sept 2025, NWD secured a HK\$5.9 billion loan facility from Deutsche Bank, using Victoria Dockside as collateral.

The application should be rejected in line with that of the Harbourfront Horizon decision.

Mary Mulvihill