



Our Ref. No.: URA260707597

16 July 2026

Town Planning Board Secretariat,
Town Planning Board,
15/F, North Point Government Offices,
333 Java Road,
North Point, Hong Kong

By Hand & By Email

Dear Sir/Madam,

Section 16 Planning Application for Proposed Minor Relaxation of Domestic Plot Ratio and Building Height Restrictions for the Permitted Residential Development with Commercial / Retail uses of the URA Ma Tau Wai Road/ Lok Shan Road Development Project (KC-020), and Proposed Public Vehicle Park
Planning Application No. A/K10/280

- Submission of Response-to-Departmental Comments -

We refer to the captioned s.16 planning application submitted to the Town Planning Board (TPB) on 26 May 2026.

To address the departmental comments received via the Kowloon District Planning Office, Planning Department (KDPO, PlanD) in June and July 2026, we submit herewith four (4) copies of the Responses to Departmental Comments table (**R to C Table**), together with the relevant replacement pages of the Planning Statement (**Appendix 1**), replacement pages of the Application Form (**Appendix 2**), and replacement pages of the Visual Impact Assessment (**Appendix 3**), for TPB's consideration.

In addition, the URA's responses to the public comments received during the publication period are provided in **Appendix 4** for TPB's consideration.

Should you have any enquiry, please feel free to contact me at 2588 2630 or our Ms. Mable Kwan at 2588 2752 / Ms. Simone Tang at 2588 2176. Thank you.

Yours faithfully,

Mike Kwan
General Manager, Planning & Design
Urban Renewal Authority

encl.

cc. DPO/Kln, PlanD (Attn: Ms. Vivian Lai, Ms. Vicki Au and Ms. Jenny Lai)



From: Tang, Simone <[REDACTED]>
Sent: 2026-07-16 星期四 18:27:17
To: tpbpd/PLAND <tpbpd@pland.gov.hk>
Cc: [REDACTED]
Subject: [E2026070IY] RE: R-to-C Submission for Planning Application No. A/K10/280 - S16 for URA Ma Tau Wai Road/ Lok Shan Road Development Project (KC-020)

Dear Sir/ Madam,

Reference is made to the Responses-to-Comments (R-to-C) submission for the captioned Section 16 planning application, submitted to the Town Planning Board (TPB) earlier today (16 July 2026).

In response to the verbal comments received from the Kowloon District Planning Office, Planning Department (KDPO, PlanD), please be clarified that the updated Notional Block Plan and Notional Section Plan (i.e. Figures 3.1 and 3.2 of the replacement pages of the Planning Statement provided in Appendix 1 of the R-to-C submission made earlier today) will supersede the previous notional design plans included in all technical assessments submitted on 26 May 2026. This update will not affect the assessments/results of all previous submitted technical assessments.

Feel free to call me if you have any questions.

Many thanks

Regards
Simone Tang
Manager (Planning & Design), URA
Tel: [REDACTED]

From: Tang, Simone
Sent: Thursday, July 16, 2026 5:34 PM
To: 'tpbpd@pland.gov.hk' <tpbpd@pland.gov.hk>
Cc: [REDACTED]
Subject: RE: R-to-C Submission for Planning Application No. A/K10/280 - S16 for URA Ma Tau Wai Road/ Lok Shan Road Development Project (KC-020)

Dear Sir/ Madam,

Further to my E-mail below. Please find the updated R-to-C Submission Package which supersede the previous version submitted earlier today for further processing.

[REDACTED]

☐Urgent ☐Return receipt ☐Expand Group ☐Restricted ☐Prevent Copy ☐Confidential

Please note that the soft copies of all required documents (including the Cover Letter, R-to-C Table and Replacement Pages of the Planning Statement, replacement pages of the Application Form, replacement pages of the Visual Impact Assessment and Responses to Public Comments) have been uploaded to TPB's designated hyperlink as follows:

Should you have any enquiry, please feel free to contact me at [REDACTED] or our Mr. Issac Ng at [REDACTED].

Regards
Simone Tang
Manager (Planning & Design), URA
Tel: [REDACTED]

From: Tang, Simone
Sent: Thursday, July 16, 2026 4:35 PM
To: 'tpbpd@pland.gov.hk' <tpbpd@pland.gov.hk>
Cc: [REDACTED]
[REDACTED]

Subject: RE: [E2026050TL] R-to-C Submission for Planning Application No. A/K10/280 - S16 for URA Ma Tau Wai Road/ Lok Shan Road Development Project (KC-020)

Dear Sir/ Madam,

We refer to the captioned s.16 planning application submitted to the Town Planning Board (TPB) on 26 May 2026.

To address the departmental comments received via the Kowloon District Planning Office, Planning Department (KDPO, PlanD) in June and July 2026, we submit herewith the full Responses to Departmental Comments (R-to-C) submission package via below link (with Cover Letter, Responses to Departmental Comments table (R to C Table), together with the relevant replacement pages of the Planning Statement (Appendix 1), replacement pages of the Application Form (Appendix 2), replacement pages of the Visual Impact Assessment (Appendix 3) and Responses to Public Comments (Appendix 4)) for TPB's consideration.

R-to-C Submission Package:
[REDACTED]

The hard copy of the submission will be delivered to TPB today.

Should you have any enquiry, please feel free to contact me at [REDACTED] or our Mr. Issac Ng at [REDACTED].

Many thanks

Regards
Simone Tang
Manager (Planning & Design), URA
Tel: [REDACTED]

From: Tang, Simone

Sent: Tuesday, May 26, 2026 3:26 PM

To: 'tpbpd@pland.gov.hk' <tpbpd@pland.gov.hk>

Cc: [REDACTED]
[REDACTED]

Subject: [E2026050TL] S16 Planning Application Submission for URA Ma Tau Wai Road/ Lok Shan Road Development Project (KC-020) (May 2026)

Dear Sir/ Madam,

Pursuant to Section 16 of the Town Planning Ordinance (CAP. 131), we submit herewith the captioned planning application for the consideration of the Town Planning Board (TPB). Please find the following documents at below links for your processing:

1. A signed soft copy of the application form (including the full set of land registry record and a copy of the newspaper publications and site notices posted to demonstrate reasonable steps given to notify owners within the Application Site):
[REDACTED]
[REDACTED]

2. A soft copy of the Planning Statement with full set of appendices:
[REDACTED]
[REDACTED]

In addition, the hard copy of the submission has been delivered to the TPB earlier today, attached please find the cover letter with TPB's stamp of receipt for your information.

Should you have any enquiry, please feel free to contact me at [REDACTED] or our Mr. Issac Ng at [REDACTED].

Many thanks

Regards

Simone Tang

Manager (Planning & Design), URA

Tel: [REDACTED]

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Section 16 Planning Application for Proposed Minor Relaxation of Domestic Plot Ratio and Building Height Restrictions for the Permitted Residential Development with Commercial / Retail uses of the URA Ma Tau Wai Road/ Lok Shan Road Development Project (KC-020), and Proposed Public Vehicle Park (Planning Application No. A/K10/280)

Response to Departmental Comments Table

Nos.	Comments received from:
1.	Kowloon District Planning Office, Planning Department (KDPO, PlanD)
2.	Chief Estate Surveyor/Urban Renewal, Lands Department (CES/UR, LandsD)
3.	Chief Town Planner/Urban Design & Landscape (CTP/UD&L)
4.	Chief Architect/Advisory and Statutory Compliance Division, Architectural Services Department (CA/ASC, ArchSD)
5.	Chief Engineer/Construction, Water Supplies Department (CE/C of WSD)
6.	Antiquities and Monuments Office, Development Bureau (AMO, DevB)
7.	Director of Environmental Protection (DEP)
8.	Chief Estate Surveyor/ Railway Development Section, LandsD (CES/RDS, LandsD)
9.	Chief Engineer/ Mainland South, Drainage Services Department (CE/MS,DSD)

- Appendix 1:** Replacement pages of the Planning Statement
Appendix 2: Replacement pages of the Application Form
Appendix 3: Replacement pages of the Visual Impact Assessment
Appendix 4: Response to Public Comments

Section 16 Planning Application for Proposed Minor Relaxation of Domestic Plot Ratio and Building Height Restrictions for the Permitted Residential Development with Commercial / Retail uses of the URA Ma Tau Wai Road/ Lok Shan Road Development Project (KC-020), and Proposed Public Vehicle Park (Planning Application No. A/K10/280)

Response to Departmental Comments Table

Departmental Comments	Responses
1. Kowloon District Planning Office, Planning Department (KDPO, PlanD)	
<i>Received via email dated 10 June 2026</i>	
Planning Report 1. Statement of Undertaking: Regarding paragraph 3.1.2 in the planning statement, it is noted that a “site subdivision study” will be conducted, and that the architectural layout, building blocks, and overall massing will be configured during the detailed design stage to ensure compliance with the development restrictions of the application site. Please further elaborate on the underlying principles that may be used to determine these development restrictions. This elaboration should demonstrate that compliance can be verified and substantiated during the detailed design stage (i.e. General Building Plan (GBP) submission). For instance, whether Gross Floor Area (GFA) calculations within the application site may be presented with diagrammatic breakdowns and detailed calculations - similar to the standard GFA diagrams for accountable, non-accountable, and exempted areas currently required for GBP submissions. Alternatively, other approaches or rationales may be proposed to demonstrate the feasibility of meeting these restrictions within the application site boundary.	The URA undertakes in the subject S16 Planning Application that the portion of the future combined development within the Application Site will not exceed maximum domestic plot ratio (DPR) of 8.0 and total plot ratio (PR) of 9.0, thereby sharing the same development controls with the adjoining CBS-2:KC upon the approval of this S16 Planning Application. The undertaking will be substantiated and incorporated by an Authorised Person in the subsequent GBP submissions and land grant stipulation in appropriate form to be liaised and agreed with relevant Government departments at detailed design stage.
2. Non-domestic Plot Ratio (PR) Noting that the increase in domestic PR from 7.5 to 8 generating the need for additional domestic floors is one of the major justifications to relax BHR, please consider to revise the planning statement.	The concerned paragraph has been deleted, please refer to the replacement page of the Planning Statement provided in Appendix 1.

Section 16 Planning Application for Proposed Minor Relaxation of Domestic Plot Ratio and Building Height Restrictions for the Permitted Residential Development with Commercial / Retail uses of the URA Ma Tau Wai Road/ Lok Shan Road Development Project (KC-020), and Proposed Public Vehicle Park (Planning Application No. A/K10/280)

Response to Departmental Comments Table

Departmental Comments	Responses
3. Modular Integrated Construction (MiC) Please clarify/confirm if MiC shall not be adopted in the subject application, i.e. the proposed minor relaxation of the building height restriction (BHR) is not a result of using MiC.	Please be clarified that the proposed minor relaxation of the building height restriction (BHR) under the subject S16 Planning Application is not as a result of using MiC.
4. Floor-to-Floor Height (FTFH) According to Figure 3.2, the typical floor-to-floor height (FTFH) proposed for the indicative scheme is 3.3m to 3.5m, stated to be consistent with private residential developments in Hong Kong. Given that an FTFH of 3.15m or below is typically adopted across the industry including in several URA projects; please provide examples of developments that support your proposed 3.3m to 3.5m range.	The proposed typical FTFH of 3.3m to 3.5m has taken reference to many recent residential developments in HK, examples including the following private residential developments in To Kwa Wan: • 80 Maidstone Road (翰畋), located to west of the Application Site, with a typical FTFH of 3.3m; • The Vantage (啟岸), located at 63 Ma Tau Wai Road, with typical FTFH of 3.5m; and • Highwood (壹沐), located at 70 To Kwa Wan Road, with a typical FTFH of 3.3m. Besides, the following developments in other districts also adopt similar high ceilings, examples include: • One Park Place (柏景峰), Yau Tong, with typical FTFH of 3.3m; and • The Paddington (曉柏峰), Cheung Sha Wan, with typical FTFH of 3.5m.
5. Proposed BH of the indicative scheme Although indicative, the proposed notional scheme should generally present a worst-case scenario to ascertain the technical feasibility and justify the proposed minor BHR relaxation. The current proposal includes three basement levels, two aboveground podium storeys, and two	The originally provided Figure 3.2 in the Planning Statement was to demonstrate the possible design flexibilities of the future development. To demonstrate the genuine technical necessity for the proposed minor relaxation of BHR, a

Section 16 Planning Application for Proposed Minor Relaxation of Domestic Plot Ratio and Building Height Restrictions for the Permitted Residential Development with Commercial / Retail uses of the URA Ma Tau Wai Road/ Lok Shan Road Development Project (KC-020), and Proposed Public Vehicle Park (Planning Application No. A/K10/280)

Response to Departmental Comments Table

Departmental Comments	Responses
lobby/clubhouse floors requires justifications about the genuine need for a BHR relaxation to accommodate above-ground carparking. If this need cannot be demonstrated for a single site, it is even less convincing for a combined development, where a larger site area offers more flexibility to accommodate the site constraints and reduce the building height. Considering that up to 100% site coverage may be utilized for the non-domestic podium below 15m as mentioned in the planning statement, please explicitly demonstrate that the aboveground storeys have been fully optimized. Additionally, the provision of two storeys for a lobby/clubhouse requires justification.	revised Figure 3.2 is included as replacement page of the Planning Statement in Appendix 1 can illustrate a “worst-case scenario”, which incorporates the following changes: 1. Reduction of nos. of basement storeys and the extent from three storeys to slightly more than one storey; 2. Consolidate nos. of lobby/clubhouse floors from 2 storeys into 1 single storey; and 3. Fully optimise the building footprint and site coverage of 100% across the 3-storey above-ground podium to accommodate essential Commercial/ Retail Carpark/ E&M use. Relevant replacement pages of the Application Form are also provided in Appendix 2 to reflect the above minor changes.
6. Justifications for relaxation of BH Paragraph 4.4.5 of the planning statement states that “the proposed increase in BHR from 120mPD to 140mPD can facilitate the necessary design flexibility to accommodate the aboveground carparks if required...”, which may misleadingly imply that the entire 20m BH increase is dedicated solely to accommodating aboveground carparks, whereas the submitted notional scheme indicates otherwise. Please clarify and amend.	Para. 4.4.5 has been updated and provided as replacement page of the Planning Statement in Appendix 1. Please be clarified that the proposed minor relaxation of BHR from 120mPD to 140mPD is not solely to allow flexibility for accommodating aboveground carparks, but also as stated in the “Planning Merits and Justification” in Section 4 of the Planning Statement that: for aligning the building height control to provide the essential design flexibility needed to materialize a holistic planning for combined development with CBS-2:KC, overcoming existing site constraints with a compact net site area and elongated configuration and to deliver key planning gains that enhance the walkability and accessibility of the area. With the increase of BHR, it will further facilitate the design flexibility in future to consider adoption of above-ground carpark at the detailed design stage after capturing the above stated merits.

Section 16 Planning Application for Proposed Minor Relaxation of Domestic Plot Ratio and Building Height Restrictions for the Permitted Residential Development with Commercial / Retail uses of the URA Ma Tau Wai Road/ Lok Shan Road Development Project (KC-020), and Proposed Public Vehicle Park (Planning Application No. A/K10/280)

Response to Departmental Comments Table

Departmental Comments	Responses
7. Comparison of OZP Compliant Proposal and Current Indicative Proposal (Table 3.1) Noting that the average flat sizes in the OZP compliant proposal and that for the indicative proposal, the comparison is not like-for-like and lacks a meaningful basis. Please adopt the same average flat size in both scenarios to show the net increase in the number of flats accurately.	Noted. Table 3.1 has been updated and provide as replacement page of the Planning Statement in Appendix 1. For a like-to-like analysis, an average flat size of about 45sq.m. under the Current Indicative Proposal has been applied to both the OZP compliant scenario and current S16 scenario in the comparison table in Table 3.1. This revised comparison provides a consistent and meaningful basis to demonstrate the net increase in number of flats and corresponding population.
<i>Received via email dated 13 July 2026</i>	
8. Noting that there is a pedestrian connection to the south of the Site between Ma Tau Wai Road and the adjoining CBS-2:KC site, please provide the relevant dimensions (i.e. in terms of width and height) and indicate on the relevant block and section plans.	With the aim of enhancing the walkability and accessibility of the area, the Project will provide a pedestrian connection linking Ma Tau Wai Road to the Public Open Space (POS) and at-grade pedestrian avenue/event plaza network planned under the approved DSP of CBS-2:KC to create a cohesive and integrated spatial network for the two projects. The proposed pedestrian connection, as indicatively shown in the Notional Design under Figures 3.1 and 3.2 of the replacement pages of the Planning Statement in Appendix 1, are not drawn to scale, it is approximately 10m (width) x 8m (height) subject to detailed design.
2. Comments of the Chief Estate Surveyor/Urban Renewal, Lands Department (CES/UR, LandsD)	
<i>Received via email dated 25 June 2026</i>	
1. The KC-020 Development Project (the Project) should be self-sustainable subject to planning intention. Otherwise, policy support/steer from DEVB should be sought and obtained where appropriate in the land grant application stage.	At the commencement of the KC-020 Project in August 2024, the Project stated with the planning objectives to adopt holistic site planning and integrated design with the adjoining URA CBS-2:KC Development Scheme to create a cohesive built environment, with proposed shared-use of vehicular run in/ out to maintain street vibrancy along Ma Tau

Section 16 Planning Application for Proposed Minor Relaxation of Domestic Plot Ratio and Building Height Restrictions for the Permitted Residential Development with Commercial / Retail uses of the URA Ma Tau Wai Road/ Lok Shan Road Development Project (KC-020), and Proposed Public Vehicle Park (Planning Application No. A/K10/280)

Response to Departmental Comments Table

Departmental Comments	Responses
	Wai Road to bring greater planning gain. Such planning objectives and intention have been clearly explained in the Public Inspection Document at commencement. The intention is also stated in the URA's planning submission to the SDEV under s.24 of URAO, which was subsequently authorized by SDEV without amendment in August 2025. In line with the planning intention of the Project as authorised by SDEV, the purpose of the subject S.16 planning application is to seek for minor relaxation of the PR and the BHR for KC-020, such that it can align with the permitted parameters of the adjoining URA's CBS-2:KC development Scheme for a holistic design and integrated development, facilitating a more flexible and cohesive design of developments across the two sites. Subsequent to approval of the S.16 Planning Application, URA will apply for a land grant to cover the subject Application Site and part of the project area of the adjoining CBS-2:KC, such that the future combined development can be developed under same parameters on the land within the new land grant. Nevertheless, URA has undertaken in the subject S16 Planning Application that upon the approval of the S.16 planning application, the portion of the future combined development within the Application Site will not exceed maximum DPR of 8.0 and total PR of 9.0.
2. Should SDEV subsequently decide to proceed with the Project, URA is required to submit the land grant application to LandsD for implementation of the Project including the planning intention contained in the OZP and the captioned s.16 planning application. There is no guarantee that the application will be approved, and the maximum GFA and other development	Please be clarified that SDEV had authorized the URA to proceed with the Project without any amendment on 26 August 2025, the decision was gazetted on 5 September 2025. The current S.16 planning application is to seek TPB's approval on the minor relaxation of the PR and BHR of the Project. Upon approval of the S.16, URA will follow the established land

Section 16 Planning Application for Proposed Minor Relaxation of Domestic Plot Ratio and Building Height Restrictions for the Permitted Residential Development with Commercial / Retail uses of the URA Ma Tau Wai Road/ Lok Shan Road Development Project (KC-020), and Proposed Public Vehicle Park (Planning Application No. A/K10/280)

Response to Departmental Comments Table

Departmental Comments	Responses
parameters will be incorporated into the future land grant conditions. If the land grant application is approved by LandsD acting in its capacity as the landlord, it will be subject to such terms and conditions (including payment of premium and administrative fee) as considered appropriate by LandsD at its absolute discretion.	administration procedures to submit land grant application to LandsD at detailed design/ project implementation stage.
3. Comments of the Chief Town Planner/Urban Design & Landscape (CTP/UD&L)	
<i>Received via email dated 29 June 2026</i>	
<u>General Comments</u> 1. The Applicant seeks planning permission for proposed minor relaxation of domestic plot ratio restriction from 7.5 to 8.0 and building height restriction (BHR) from 120mPD to 140mPD for permitted residential development with commercial/retail uses, and proposed 'Public Vehicle Park' use at the subject site (the Site). The Applicant has submitted a Visual Impact Assessment (VIA) in support of the application. However, no design merits have been provided in the subject application.	Please be clarified that the primary objective of the subject S16 Planning Application is to align the development controls of the Application Site (KC-020) with those of the adjoining CBS-2:KC, to facilitate combined development of the two projects to optimised planning and design merits. From urban design perspective, the following design merits can be achieved through the subject S16 Planning Application (for aligning the development controls of the two projects): • Overcoming site constraints of the Subject Application Site for a more desirable building disposition: The Application Site is elongated and narrow (with site width only about 21m). A standalone redevelopment would necessitate an undesirable, single-aspect, elongated slab-like block. Combining the sites under same development control parameters in one land grant can allow for flexible building design and layouts across the two project boundaries and avoid the design constraints between boundaries such as prescribed window consideration. The building block design can be more diverse and flexible to avoid for building a single aspect and wall-like effect building on the narrow Application site.

Section 16 Planning Application for Proposed Minor Relaxation of Domestic Plot Ratio and Building Height Restrictions for the Permitted Residential Development with Commercial / Retail uses of the URA Ma Tau Wai Road/ Lok Shan Road Development Project (KC-020), and Proposed Public Vehicle Park (Planning Application No. A/K10/280)

Response to Departmental Comments Table

Departmental Comments	Responses
	Enhancing design flexibility for the Combined Development and create cohesive built environment: Aligning the building heights "extinguishes" the physical vertical gap of 20mPD difference created by the project boundaries and thus allow greater design flexibility in building block and site layout across the two sites. With the combined development on a combined bigger site, it enables more flexible disposition between buildings, slimmer residential towers, wider building separation, and a staggered podium design and spatial connection, thereby enhance visual comfort and cohesive built environment of the combined site development. Enhancing walkability and connectivity: Aligning the DPR and BHR controls allows the podia and at-grade spaces of both sites to be planned and designed holistically. For instance, integrated podium design spanning across both sites could optimize internal circulation and efficiency, and footbridges/linkages to connect the retail/commercial podia maybe included to further enhance the physical linkage across the two sites. Meanwhile, the at-grade pedestrian avenue / event plaza and POS of CBS-2:KC could be holistically designed with KC-020 to form an open space network in which the proposed at-grade pedestrian connection at the Application Site will connect with the at-grade pedestrian avenue/ event plaza and at-grade Public Open Space (POS) provided under CBS-2:KC to enhance spatial connectivity, walkability, and overall accessibility, forming a cohesive and integrated pedestrian network linking the east and west, i.e. from the Lok Man Sun Chuen residential cluster at the western side

Section 16 Planning Application for Proposed Minor Relaxation of Domestic Plot Ratio and Building Height Restrictions for the Permitted Residential Development with Commercial / Retail uses of the URA Ma Tau Wai Road/ Lok Shan Road Development Project (KC-020), and Proposed Public Vehicle Park (Planning Application No. A/K10/280)

Response to Departmental Comments Table

Departmental Comments	Responses
	of Kau Pui Lung Road to the POS and GIC clusters at the eastern side of Ma Tau Wai Road, via the spatial connection and podia at the future combined site of KC-020 and CBS-2:KC, and the existing pedestrian-crossing facilities at Ma Tau Wai Road. • Preserving streetscape vibrancy: The combined development enables shared use of the vehicular access at Kau Pui Lung Road with CBS-2:KC, eliminates the need for vehicular access along Ma Tau Wai Road and Lok Shan Road, thereby maintaining retail street frontage and vibrancy along Ma Tau Wai Road and Lok Shan Road and safeguarding pedestrian safety along these primary walking routes.
2. The Site is located within a cluster of residential developments to the west of Ma Tau Wai Road zoned “R(A)” with BHRs ranging from 120mPD to 140mPD. The URA Kau Pui Lung Road/Chi Kiang Street Development Scheme (CBS-2:KC) with BHR of 140mPD is situated to its immediate west. On the other side of Ma Tau Wai Road, there is another cluster of residential developments sandwiched between Ma Tau Wai Road to the west and To Kwa Wan Road to the southeast zoned “R(A)” with BHR of 120mPD. According to the Explanatory Statement of the draft Ma Tau Kok Outline Zoning Plan No. S/K10/31, there are four main building height bands – 80mPD, 100mPD, 120mPD and 140mPD in the Area for the “C”, “CDA”, “R(A)”, “R(B)” and “R(E)” zones – increasing progressively from the waterfront to the inland and foothill areas. The proposal with a proposed BH of 140mPD may weaken the intended stepped height profile descending towards the waterfront. Notwithstanding that, it would generally be compatible with the prevailing	Noted. The proposed minor relaxation of BHR from 120mPD to 140mPD under the subject S16 Planning Application fully respect and responsive to the stepped height profile of the area. Being located next to CBS-2:KC, Lok Man Sun Chuen, and Celestial Heights (all of which are subject to a BHR of 140mPD), the Current S16 Planning Proposal logically aligns with the 140mPD height limit of these adjoining developments and thus consolidates the highest building height cluster in the inland area to form a cohesive urban backdrop, from which the building height profile will continue to systematically step down from 140 mPD to 100mPD from inland area near Lok Man Sun Chuen to the waterfront.

Section 16 Planning Application for Proposed Minor Relaxation of Domestic Plot Ratio and Building Height Restrictions for the Permitted Residential Development with Commercial / Retail uses of the URA Ma Tau Wai Road/ Lok Shan Road Development Project (KC-020), and Proposed Public Vehicle Park (Planning Application No. A/K10/280)

Response to Departmental Comments Table

Departmental Comments	Responses
character and intended height profile of the surrounding area.	
<u>Detailed comments/observations</u> <i>Planning Statement</i> 3. para. 4.8.3 – the ratings of the visual impact to the selected VPs should be included;	Noted. A new Table 4.1 has been incorporated under Para. 4.8.3 of the replacement pages of the Planning Statement (Appendix 1 refers) to summarize the overall visual impact ratings for the selected Viewpoints (VPs) based on the findings of the Visual Impact Assessment (VIA).
<i>Visual Impact Assessment (VIA)</i> 4. the VIA should be prepared in accordance with the latest promulgated Town Planning Board Guidelines on Submissions of VIA for Planning Applications to the Town Planning Board (TPB PG-No. 41A);	Noted. The VIA has been updated in accordance with the latest promulgated Town Planning Board Guidelines on submissions of Visual Impact Assessment for Planning Applications to the Town Planning Board (TPB PG-No. 41A). The relevant replacement pages of the VIA report have been provided in Appendix 3.
5. para. 3.2.1 – as per TPB PG-No. 41A regarding visual envelope, the extent of assessment area should be equal to three times of the actual BH of the proposed development instead of the proposed BH restriction;	Noted. Paragraph 3.2.1 of the Visual Impact Assessment (VIA) has been updated in accordance with TPB PG-No. 41A. The extent of the assessment area has been revised based on three times of the actual building height of the proposed development. Since the actual building height as per the notional design for the Current S16 Planning Proposal is about 130m (i.e. the proposed BHR of 140mPD minus the site formation level of 10.9mPD), the visual envelope (VE) is therefore covering a radial area of about 390m (i.e. 130m x 3). Figure 3.1, 3.3 and 5.1-5.7 have been revised and provided in replacement pages of the VIA report are provided in Appendix 3.
6. Tables 4.1 and 6.1 (VP4 and VP5) – having considered the visual quality and the popularity of VP4 (entrance of Ko Shan	Noted. The visual sensitivity of VP4 and VP5 has been updated to “medium” in Tables 4.1

Section 16 Planning Application for Proposed Minor Relaxation of Domestic Plot Ratio and Building Height Restrictions for the Permitted Residential Development with Commercial / Retail uses of the URA Ma Tau Wai Road/ Lok Shan Road Development Project (KC-020), and Proposed Public Vehicle Park (Planning Application No. A/K10/280)

Response to Departmental Comments Table

Departmental Comments	Responses
Road Park) and VP5 (Kau Pui Lung Road Playground), it would be more tenable to grade the visual sensitivity of these VPs as “medium” rather than “low”;	and 6.1 in the VIA report, please refer to the replacement pages provided in Appendix 3 .
7. Table 5.2 (VP3) – the second para. should read as “The open sky view and visual openness will only result in minor additional obstruction...”;	Noted. The relevant paragraph under Table 5.2 (VP3) has been updated and provided as replacement page of the VIA report in Appendix 3 .
8. para. 6.4 – the conclusion should read as “it is anticipated that the subject s.16 planning application would unlikely induce significant adverse visual impacts to the surroundings”.	Noted. Para. 6.4 has been updated and provided as replacement page of the VIA report in Appendix 3 .
9. Figure 5.1 (VP1) – the proposed development under the OZP Compliant Scheme and the Proposed Scheme should appear to be slimmer, and the podium should appear to be lower.	Noted. Figure 5.1 (VP1) has been updated and provided as replacement page of the VIA report in Appendix 3 .
10. Figure 5.6 (VP6) – the proposed development would be completely screened off by the adjoining CBS-2:KC.	Noted. Figure 5.6 (VP6) and the corresponding "Appraisal of Visual Impacts of Selected Viewpoints" in Table 5.2 (VP6) have been updated and provided as replacement pages of the VIA report in Appendix 3 .
4. Comments of the Chief Architect/Advisory and Statutory Compliance Division, Architectural Services Department (CA/ASC, ArchSD)	
<i>Received via email dated 29 June 2026</i>	
1. Based on the information provided, it is noted that the proposed development mainly consists of 1 tower with an overall plot ratio (PR) of 9 (including domestic PR of 8) and a maximum building height (BH) of 140mPD. The proposed overall PR and BH appears to be compatible with the adjacent approved Development Scheme Plan area ('CBS-2:KC'). From Figure 5.1 (Photomontages of VP1 - Lok Shan Road Sitting-out Area), Figure 5.2	Please be clarified that the viewpoints (VPs) adopted in the VIA report has consulted Urban Design & Landscape Section of Planning Department (UD&L, PlanD) earlier, who also indicated no comments/objections to the selected VPs as reflected in Section 3 of this R-to-C Table. For information, the VPs selection was made in accordance with TPB PG-No. 41A, covering “views from all four cardinal directions and

Section 16 Planning Application for Proposed Minor Relaxation of Domestic Plot Ratio and Building Height Restrictions for the Permitted Residential Development with Commercial / Retail uses of the URA Ma Tau Wai Road/ Lok Shan Road Development Project (KC-020), and Proposed Public Vehicle Park (Planning Application No. A/K10/280)

Response to Departmental Comments Table

Departmental Comments	Responses
(Photomontages of VP2 - To Kwa Wan Market at the Junction of Kowloon City Road and Lok Shan Road) and Figure 5.6 (Photomontages of VP6 - Lok Man Sun Chuen at the Junction of Lok Shan Road and Kau Pui Lung Road), it is noted that the full extent of the proposal was not shown. In order to enable us to comment on the visual impact of the development, the Applicant may wish to review the viewing points for photomontages, subject to PlanD's view.	included short-to-long range views". VP1, VP2, and VP6 were intentionally selected to assess the visual impact from a short-range view. Due to their close proximity to the Application Site, they cannot capture the full extent of the development yet are essential for a comprehensive visual assessment.
5. Comments of the Chief Engineer/Construction, Water Supplies Department (CE/C of WSD)	
<i>Received via email dated 29 June 2026</i>	
1. The applicant has submitted a Water Supply Impact Assessment (WSIA) for URA Projects CBS-2 and KC-020. WSD has reviewed the report and provided comments on the projected water supply and demand arising from the proposed development. However, these comments have not yet been addressed. The applicant is therefore required to submit an updated WSIA that fully addresses WSD's comments. Failure to finalise the WSIA may adversely affect the processing of the water supply application for the proposed development.	Please be clarified that the WSIA for URA Projects CBS-2 and KC-020 referred by WSD was submitted earlier for the purpose of detailed project implementation of CBS-2:KC and KC-020. That report is not the subject matter of the current S16 Planning Application. Nevertheless, WSD's comments will be addressed separately at detailed design and implementation stages subsequent to the approval of the subject S16 Planning Application. Please be informed that a WSIA is provided in the EA report in Appendix D of the Planning Statement of the Subject S16 Planning Application, which was submitted on 26 May 2026. The WSIA included was prepared specifically to demonstrate that the subject S16 Planning Application (i.e. minor relaxation of permissible DPR from 7.5 to 8.0 and BHR from 120mPD to 140mPD for KC-020) has no insurmountable technical impact from water supply aspects. The assessment has sufficiently demonstrated that the existing / planned fresh and salt water supply systems in the vicinity are adequate to meet the demands arising from the current S16 planning proposal.

Section 16 Planning Application for Proposed Minor Relaxation of Domestic Plot Ratio and Building Height Restrictions for the Permitted Residential Development with Commercial / Retail uses of the URA Ma Tau Wai Road/ Lok Shan Road Development Project (KC-020), and Proposed Public Vehicle Park (Planning Application No. A/K10/280)

Response to Departmental Comments Table

Departmental Comments	Responses
6. Comments of the Antiquities and Monuments Office, Development Bureau (AMO, DevB)	
<i>Received via email dated 29 June 2026</i>	
1. Given the comparatively long history of the pre-war building at No. 344 Ma Tau Wai Road, should there be any redevelopment plan affect it, we would appreciate if the project proponent could produce a photographic record of the interior and exterior of the building and share it with AMO for documentation purposes and for potential future use in research, exhibitions and educational programmes, so as to align with our previous comments provided via email dated 6 February 2025.	Noted. The subject building is not a declared monument nor a graded historic building. It is also not among the Antiquities and Monuments Office's list of 1,444 Historic Buildings and New Items. The subject site is currently under resumption process. Upon URA successfully completed acquisition of the subject property interests and clearance, URA will conduct necessary records. Continuous communication and liaison with AMO will be made in the subsequent implementation stages for appropriate records of the building if required.
7. Comments of the Director of Environmental Protection (DEP)	
<i>Received via email dated 30 June 2026</i>	
1. The applicant (Urban Renewal Authority (URA)) seeks planning permission for proposed minor relaxation of domestic PR and BH restrictions for permitted residential development with commercial/retail uses, and proposed "Public Vehicle Park" use for URA's Development Project (KC-020) at Ma Tau Wai Road/Lok Shan Road (the Site). Based on the supporting planning statement including the Air Quality Impact Assessment (AQIA), the Environmental Assessment (EA) and Drainage and Sewerage Impact Assessment (DSIA) submitted by the applicant. It is noted that the current proposal submitted under the captioned application is a Notional Design for illustration purpose for technical assessments. Based on the findings of the AQIA, EA and DSIA, insurmountable environmental impact associated with the Notional Design is not anticipated and summarized as follows: i) On air quality, quantitative AQIA has been	Noted.

Section 16 Planning Application for Proposed Minor Relaxation of Domestic Plot Ratio and Building Height Restrictions for the Permitted Residential Development with Commercial / Retail uses of the URA Ma Tau Wai Road/ Lok Shan Road Development Project (KC-020), and Proposed Public Vehicle Park (Planning Application No. A/K10/280)

Response to Departmental Comments Table

Departmental Comments	Responses
conducted for the Site. By properly locating the air sensitive uses including openable windows and fresh air intakes at above 1/F (4.55mAG/15.45mPD) and not be located within the AQO exceedance zone, adverse air quality impact is not anticipated. ii) On noise, a road traffic noise impact assessment has been carried out for the Notional Design and all practicable traffic noise mitigation measures have been adopted to achieve 96% compliance of road traffic noise standard. Also, the potential fixed noise impact has been assessed for the Notional Design and the predicted fixed noise level at all NSRs will comply with the relevant standard. In future detailed design stage, all the noisy facilities such as ventilation system for podium will be properly designed by various means such as selection of quiet equipment, use of shielding device, acoustic louvers silences, semi/full enclosure. iii) On sewage, the SIA has demonstrated that the capacity of existing sewerage system is sufficient to cater for the sewerage generated from the Notional Design. No sewerage upgrading works is required.	
2. On the above basis, we have no objection to the captioned application from the environmental perspective. As we understand from URA that the draft land grant for the Site will be circulated for departmental comments at later stage, we intend not to impose planning conditions on the captioned application. Nevertheless, we still have comments on the AQIA, EA, and DSIA as provided in Annex A for further consideration and refinement during detailed design stage.	Noted. EPD's 'no objection' to the subject S16 Planning Application is gratefully acknowledged. The technical comments on the AQIA, EA, and DSIA will be addressed accordingly at detailed design stage subsequent to the approval of the subject planning application.

Section 16 Planning Application for Proposed Minor Relaxation of Domestic Plot Ratio and Building Height Restrictions for the Permitted Residential Development with Commercial / Retail uses of the URA Ma Tau Wai Road/ Lok Shan Road Development Project (KC-020), and Proposed Public Vehicle Park (Planning Application No. A/K10/280)

Response to Departmental Comments Table

Departmental Comments		Responses																																
8. Comments of the Chief Estate Surveyor (Railway Development Section), LandsD (CES/RDS, LandsD)																																		
Received via email dated 30 June 2026																																		
1. According to our land status check, the Application Site and the Development Project Boundary fall within the following railway-related land status:- <table><tr><th>Item</th><th>Land Status Affected</th><th>Remarks</th><th>Party Concerned</th></tr><tr><td colspan="4">The Application Site</td></tr><tr><td>(a)</td><td>Control of Building Plan Boundary – Shatin to Central Link (“SCL”)</td><td>N/A</td><td>(i) RDO, HyD (ii) MTRCL</td></tr><tr><td colspan="4">The Development Project Boundary</td></tr><tr><td>(a)</td><td>Scheme Boundary – SCL</td><td>N/A</td><td>(iii) RDO, HyD (iv) MTRCL</td></tr><tr><td>(b)</td><td>Control of Building Plan and Commencement of Works Boundary – SCL</td><td>N/A</td><td>Ditto</td></tr><tr><td>(c)</td><td>Above Vesting Boundary – Shatin to Central Link – Tuen Ma Line (“TML”)</td><td>Blue Area (strata of underground land) as shown on Drawing No. SCL/B/SCL/MTR/P10/12 1 (Rev. A) of the Deed of Vesting dated 21.6.2021</td><td>(i) RDO, HyD (ii) KCRC</td></tr><tr><td>(d)</td><td>Easement of Vesting Boundary – SCL – TML</td><td>N/A</td><td>Ditto</td></tr></table>		Item	Land Status Affected	Remarks	Party Concerned	The Application Site				(a)	Control of Building Plan Boundary – Shatin to Central Link (“SCL”)	N/A	(i) RDO, HyD (ii) MTRCL	The Development Project Boundary				(a)	Scheme Boundary – SCL	N/A	(iii) RDO, HyD (iv) MTRCL	(b)	Control of Building Plan and Commencement of Works Boundary – SCL	N/A	Ditto	(c)	Above Vesting Boundary – Shatin to Central Link – Tuen Ma Line (“TML”)	Blue Area (strata of underground land) as shown on Drawing No. SCL/B/SCL/MTR/P10/12 1 (Rev. A) of the Deed of Vesting dated 21.6.2021	(i) RDO, HyD (ii) KCRC	(d)	Easement of Vesting Boundary – SCL – TML	N/A	Ditto	Noted. Subsequent to the approval of this S16 application, continuous coordination will be made with relevant government departments and/or parties during land grant submission stage to ascertain the detailed site survey and control plan boundaries to avoid any potential land matter implications.
Item	Land Status Affected	Remarks	Party Concerned																															
The Application Site																																		
(a)	Control of Building Plan Boundary – Shatin to Central Link (“SCL”)	N/A	(i) RDO, HyD (ii) MTRCL																															
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(a)	Scheme Boundary – SCL	N/A	(iii) RDO, HyD (iv) MTRCL																															
(b)	Control of Building Plan and Commencement of Works Boundary – SCL	N/A	Ditto																															
(c)	Above Vesting Boundary – Shatin to Central Link – Tuen Ma Line (“TML”)	Blue Area (strata of underground land) as shown on Drawing No. SCL/B/SCL/MTR/P10/12 1 (Rev. A) of the Deed of Vesting dated 21.6.2021	(i) RDO, HyD (ii) KCRC																															
(d)	Easement of Vesting Boundary – SCL – TML	N/A	Ditto																															
2. In this connection, you are advised to seek comments from the above parties concerned as appropriate. Please ensure that the project would not encroach onto the vested area or the easement of SCL. Subject to no adverse comments from the above concerned parties, this office has no comment on the captioned application from railway land administration point of view.		Ditto.																																
9. Chief Engineer/ Mainland South, Drainage Services Department																																		
Received via email dated 8 July 2026																																		
1. Appendix 3.1 Table 2a – Please supplement the reference for the total number of residential units of 2324 units for CBS-2:KC.		Please note that the total number of residential units of 2,324 units for CBS-2:KC was adopted from the notional scheme for the Approved DSP for CBS-2:KC, with 1,374 units for the northern portion and 950 units for the southern portion (i.e. total 2,324 units).																																

Appendix 1:

Replacement pages of the Planning Statement

EXECUTIVE SUMMARY

This planning application is submitted by the Urban Renewal Authority (URA) to the Town Planning Board (TPB) pursuant to Section 16 of the Town Planning Ordinance (Cap. 131), for minor relaxation of maximum domestic plot ratio (DPR) and building height restrictions (BHR) for the permitted residential development with commercial / retail uses of the URA Ma Tau Wai Road/ Lok Shan Road Development Project (KC-020 / the Application Site) and proposed Public Vehicle Park (PVP).

The Application Site, with an area of about 1,566 sq.m., falls within an area zoned “Residential (Group A)” (“R(A)”) on the Draft Ma Tau Kok Outline Zoning Plan No. S/K10/31 (OZP). It is subject to a maximum DPR of 7.5 and total plot ratio (PR) of 9.0, with BHR of 120mPD. In accordance to the development restrictions of subject “R(A)” zone, KC-020 was commenced by way of a development project pursuant to Section 26 of the Urban Renewal Authority Ordinance (URAO) on 9 August 2024 and was authorized without amendment by the Secretary for Development (SDEV) on 26 August 2025, with the decision first gazetted on 5 September 2025.

Pursuing a “district-based” approach, the Application Site is intended to be holistically planned and designed to create synergies with the adjoining URA Kau Pui Lung Road / Chi Kiang Street Development Scheme (CBS-2:KC) to optimize planning gains. To facilitate design flexibility for a cohesive combined development, it is proposed to align with the development controls of CBS-2:KC. As such, this S16 Planning Application seeks TPB permission of the following:

- (i) minor relaxation of maximum permissible DPR from 7.5 to 8.0, with total permissible plot ratio remains the same as 9.0;
- (ii) minor relaxation of BHR from 120mPD to 140mPD; and
- (iii) proposed PVP use.

The proposed relaxation in the S16 Planning Application can facilitate a more flexible layout across the two sites (i.e. the Application Site and CBS-2:KC) which are under same permissible BHR and PR controls upon this S16 approval. Nevertheless, despite that a combined development will be proposed, the URA undertakes that the portion of the future combined development within the Application Site would not exceed maximum DPR of 8.0 and total PR of 9.0.

This S16 Planning Application is a “non-scheme-based” submission. The notional design and indicative development parameters provided are solely for illustration purpose and for conducting necessary technical assessments. Except for any planning condition(s) to be imposed, the design of the future development will not be bounded by the notional design submitted in the S16 Planning Application.

The main justification in support of the S16 Planning Application are listed as follows:

- Materialize holistic planning and implementation for combined development of two URA projects under “district-based” urban renewal approach;
- Accommodate site constraints through a combined development with CBS-2:KC;
- Enhance walkability and accessibility of the area;
- Relaxation of BHR to facilitate flexible building design and potential accommodation of aboveground carpark design;
- Maintain design flexibility and project implementability;
- Enhance flexibility for residential and commercial land uses allocation in response to market needs;
- Retain the previously committed planning gains; and

- No Insurmountable technical impacts.

In light of the justifications presented in this planning statement, the TPB is respectfully requested to give favourable consideration to the application.

行政摘要

(聲明：此中文譯本僅供參考，如中文譯本和英文原文有歧異時，應以英文原文為準。)

是項規劃申請由市區重建局（市建局）向城市規劃委員會（城規會）提交，旨在根據《城市規劃條例》（第131章）第16條就市建局馬頭圍道／落山道發展項目（KC-020 / 申請地點）申請略為放寬最高住用地積比率及建築物高度限制以作准許的住宅發展及商業/零售用途及擬議公眾停車場(本規劃申請)。

申請地點的面積約1,566平方米，在現時的馬頭角分區計劃大綱草圖編號S/K10/31（大綱圖）上劃為「住宅（甲類）」地帶，並受限於最高住用地積比率7.5 倍、最高總地積比率9倍及主水平基準以上120米的建築物高度限制。按上述「住宅（甲類）」地帶的限制，KC-020項目已於2024年8月9日根據《市區重建局條例》第26條以發展項目形式開展，並於2025年8月26日獲發展局局長在不作任何修訂的情況下授權市建局推行項目，相關決定已於2025年9月5日首次刊憲。

透過「地區為本」的市區更新模式，申請地點將與毗鄰的市建局靠背壟道／浙江街發展計劃（CBS-2:KC）作整體性規劃及設計，以發揮協同效應，為該區帶來更大的規劃裨益。為提升設計彈性以實現一體化發展，本規劃申請擬議將申請地點的發展參數限制與 CBS-2:KC 調整一致，因此向城規會提出以下申請：

- (i) 將最高住用地積比率由 7.5 倍略為放寬至 8.0 倍，最高總地積比率維持在 9.0 倍；
- (ii) 將建築物高度限制由主水平基準以上 120 米略為放寬至 140 米；及
- (iii) 擬議公眾停車場用途。

本申請所擬放寬的限制，使該兩幅地盤（即申請地點及 CBS-2:KC）在獲得規劃許可後，受到相同的建築物高度及地積比率限制，使整體樓宇佈局更具靈活性。儘管兩個項目將採取整體發展，市建局承諾於未來的發展項目中座落於本申請地點範圍內之發展部分，其最高住用地積比率不會超過 8.0 倍，最高總地積比率亦不會超過 9.0 倍。

本規劃申請屬「非方案主導」(“non-scheme-based”) 性質。本申請所提供的初步概念設計及發展參數僅供參考及用於進行必要的技術評估。除任何施加於規劃許可的相關附帶條件外，未來項目的發展設計將不受本申請所提交的初步概念設計所限制。

以下為支持本規劃申請的主要理據：

- 實現以「地區為本」的市區更新模式，整體規劃與實施兩個市建局項目；
- 透過與 CBS-2:KC 整體發展，以克服地盤限制；
- 提升該區的行人暢達性與連接性；
- 放寬建築物高度限制，以促進樓宇設計的靈活性及容納可能設置的地面停車場；
- 保持設計彈性及項目可實施性；
- 提高住宅及商業用途分配的彈性以回應市場需求；
- 保留已承諾的規劃裨益；及
- 不會產生無法克服的技術問題。

基於以上的發展理據，現懇請城規會對本規劃申請予以贊同。

- 1.6 The subject S16 Planning Application is a “non-scheme-based” submission and the notional design and indicative development parameters provided are solely for illustration purpose and for conducting necessary technical assessments. Except for any planning condition(s) to be imposed, the design of the future development will not be bounded by the notional design submitted in the S16 Planning Application.

3. THE INDICATIVE DEVELOPMENT PROPOSAL

3.1 Proposed minor relaxation of Domestic Plot Ratio (DPR) and Building Height Restriction (BHR)

- 3.1.1 With the planning intention for holistic and integrated development for KC-020 and CBS-2:KS, this S16 Planning Application proposes to relax the maximum permissible DPR from 7.5 to 8.0 and BHR from 120mPD to 140mPD for the Application Site, to align with the DPR and BHR controls of CBS-2:KC. With both projects having the same maximum DPR of 8.0, a total PR of 9.0 and BHR of 140mPD, it can facilitate a more flexible layout across the two sites (i.e. the Application Site and CBS-2:KC) which are under same permissible BHR and PR controls upon this S16 approval.
- 3.1.2 Notwithstanding the intention for a combined development, the URA undertakes that the portion of the future combined development within the Application Site would not exceed maximum DPR of 8.0 and total PR of 9.0. To ensure adherence during the detailed design stage, the URA will conduct site sub-division study of the combined site and carefully configure the architectural layout, building blocks, and overall massing. Compliance with these prescribed limits will be clearly indicated in future GBP submissions.
- 3.1.3 A comparison between the OZP Compliant Proposal authorized by SDEV in August 2025 (OZP Compliant Proposal) and the Current Indicative Proposal of the S16 Planning Application (Current Indicative Proposal) is provided in **Table 3.1** below.
- 3.1.4 While the subject S16 Planning Application is a non-scheme-based submission, the notional block plan and section plan are provided in **Figure 3.1 and Figure 3.2** for illustration purpose and for conducting necessary technical assessments only. Except for any planning condition(s) to be imposed, the design of the future development will not be bounded by the notional design submitted in the S16 Planning Application.

Table 3.1: Comparison of the OZP Compliant Proposal and Current Indicative Proposal

Development Parameters	OZP Compliant Proposal ⁽¹⁾ [A]	Current Indicative Proposal (Subject S16) [B]	Difference [B]-[A] (% change)
Site Area ⁽²⁾ - Application Site Area (for PR Calculation) (m ²)	About 1,566	About 1,566	No change
Maximum PR - Total PR - Domestic PR	9.0 7.5	9.0 8.0	No change +0.5 (+6.7%)
GFA ⁽²⁾ Total GFA (m ²) Domestic GFA (m ²)	About 14,094 About 11,745	About 14,094 About 12,528	No change +783 (+6.7%)
Max. BH (mPD)	120	140	+20 (+16.7%)
Under Notional Design:			
No. of Residential Towers	1	1	No change
No. of Residential Floors	About 29 floors	About 31 floors	+2 (+6.9%)
No. of Retail Floors	Not more than 3 storeys	Not more than 3 storeys ⁽³⁾	No change
Average Flat Size (m²)	About 45 ⁽⁴⁾	About 45	No change ⁽⁴⁾
No. of Flats	About 263 ^{(4) (5)}	About 279 ⁽⁶⁾	+16 (+6.0%) ⁽⁴⁾
Anticipated Population ⁽⁷⁾	About 710 ⁽⁴⁾	About 753	+43 (+6.0%) ⁽⁴⁾
Site Coverage ⁽⁸⁾	Domestic portion: Not more than 37.5% Non-domestic portion below 15m: Not more than 100%	Domestic portion: Not more than 37.5% Non-domestic portion below 15m: Not more than 100%	No change
Ancillary Car Parking and L/UL Spaces ⁽⁹⁾ - Private Car Parking Spaces - Motorcycle Parking Spaces - L/UL Bays	55 ⁽¹⁰⁾ 5 ^{(10) (11)} 4 ⁽¹⁰⁾	58 5 3	+3 (+5.5%) No change -1 (-25%)
PVP for Private Cars	0	Not more than 80 ⁽¹²⁾	N/A

Remarks:

- (1) As per the notional design under the URA Ma Tau Wai Road/ Lok Shan Road Development Project (KC-020) authorized by SDEV in August 2025 (the DP authorised by SDEV).
- (2) Based on the net site area under the latest land boundary survey, subject to agreement with LandsD in the land grant application stage. For reference, the net site area under the DP authorised by SDEV was about 1,578sq.m., the corresponding total GFA was about 14,202sq.m. and domestic GFA was about 11,835 sq.m.
- (3) Not more than 3 storeys of commercial / retail uses will be accommodated within the basement and/or podium levels. Details will be worked out at detailed design stage.
- (4) For a like-to-like analysis, an average flat size of about 45 sq.m. under the Current Indicative Proposal has been applied to both the OZP compliant and current S16 scenarios in the comparison table to show the net increase in the number of flats and population. For reference, the notional design for the DP authorised by SDEV had adopted an average flat size of about 51 sq.m. with about 232 no. of flats and an estimated population of about 626.
- (5) Estimated based on average flat size, the actual no. of flats would be worked out at detailed design stage.
- (6) Estimated based on notional design with 9 nos. of domestic units per typical floor, the actual no. of flats would be worked out at detailed design stage.
- (7) Derived by assuming 2.7 occupants as per the average domestic household size in Kowloon City District based on Population Census 2021.
- (8) Assumed in accordance with the First Schedule of Building (Planning) Regulation that for a Class B site with building height over 61m, the site coverage shall not exceed 37.5% for a domestic building or for the domestic part of a composite building. The non-domestic podium does not exceed 15m in height, a site coverage of not more than 100% shall be permitted. The actual site coverage for the development at the Application Site will be determined at detailed design stage.
- (9) Fulfilled HKPSG high-end car parking requirements.
- (10) As per car parking provision proposed under the TIA for the DP authorised by SDEV.
- (11) Adjusted based on the high-end car parking requirements under the HKPSG.
- (12) The PVP provision at the Application Site could be zero or not more than 80 numbers of PVP spaces. In any case, a total number of about 164 numbers of PVP spaces would be provided within the combined site of the Application Site and CBS-2:KC as required by TD in CBS-2KC. For details, please refer to Section 3.2 below.

3.2 Proposed Public Vehicle Park (PVP) use

3.2.1 Under the “R(A)” zoning of the Application Site, “PVP” is under Column 2 use requiring planning permission from TPB. Under the approved DSP of the CBS-2:KC, about 164 numbers of PVP parking spaces are required to be provided. To allow design flexibility for the layout and disposition of PVP spaces in the future combined development, the subject S16 Planning Application also seeks planning permission to include not more than 80 numbers of PVP spaces for private cars at the Application Site, with actual location and number to be determined in detailed design stage.

3.2.2 The intention to seek planning permission for PVP use under the subject S16 Planning Application is to allow design flexibility and to avoid further S16 planning permission to be sought in case some PVP spaces as required in CBS-2:KC might need to be provided within the Application Site area due to site constraints and/or integrated design consideration under the combined site development. Hence, it does not necessarily mean that there must be certain amount of PVP provision in the Application Site (i.e. PVP provision at the Application Site could be zero or not more than 80 numbers of PVP spaces). In any case, a total number of about 164 numbers of PVP spaces would be provided within the combined site of the Application Site and CBS-2:KC as required by Transport Department (TD) in CBS-2KC.

fulfill prescribed window requirement on the west side of the boundary. The single-aspect building design would severely compromise overall site efficiency and layout desirability. From a visual and urban design perspective, this would result in a single, elongated slab-like block along the site's frontage which is not conducive to effective tower disposition and desirable urban space.

- 4.2.3 The subject S16 Planning Application is a pragmatic response to these site constraints, which allows for a more flexible and efficient block layout across the project boundaries under integrated design of the combined site (**Figure 4.1** refers). Without increasing the overall development intensity of the Application Site, the Current Indicative Proposal in **Figure 4.1** demonstrates that the minor relaxation would facilitate a viable layout with better urban design for a site with inherent physical limitations.

4.3 Enhance walkability and accessibility of the area

- 4.3.1 As planned in the approved DSP of CBS-2:KC, there will be at-grade pedestrian avenue / event plaza connecting with the surrounding pedestrian network. With the same permissible PR controls upon the S16 approval of the Application Site, the two projects, i.e. KC-020 and CBS-2:KC, can be holistically planned on the podia layout and the at-grade spaces for better integration and connection between the two sites.
- 4.3.2 Under the combined site development of the Application Site and CBS-2:KC, the planning intention to enhance walkability and accessibility of the area can be further enhanced by integrating the at-grade space network and podia design. For example, podium design can be more flexible to across the two sites with better internal circulation and efficiency, with footbridges/linkages to connect the retail/commercial podia between the two projects to enhance connectivity. It will facilitate an early and comprehensive planning on integrated pedestrian linkage between the east and west, i.e. from the Lok Man Sun Chuen residential cluster at the western side of Kau Pui Lung Road to the POS and GIC clusters at the eastern side of Ma Tau Wai Road, via the spatial connection and podia at the future combined site of KC-020 and CBS-2:KC, and the existing pedestrian-crossing facilities at Ma Tau Wai Road (**Figure 4.1** refers).
- 4.3.3 This east-west pedestrian connection will not only benefit the local circulation adjoining the two projects, but will also bring a combined effect to enhance the overall walkability and accessibility of the surrounding wider area through connecting with To Kwa Wan MTR Station concourse and its exits (**Figure 4.3** refers). Detailed design on the spatial connection and pedestrian network in the combined site will be worked out at detailed design stage.
- 4.3.4 Notwithstanding the combined design, the network of POS and at-grade pedestrian avenue / event plaza as planned under the approved DSP of CBS-2:KC will remain unaffected by the subject S16 Planning

Application. The 400sq.m. POS as committed in CBS-2:KC will be designed at appropriate locations at detailed designed stage, together with the 2,400sq.m. pedestrian avenue/ event plaza committed in CBS-2:KC will be holistically **designed together with the proposed pedestrian connection at KC-020** to enhance spatial connectivity, walkability, and overall accessibility between the two sites, forming a cohesive and integrated spatial network (**Figure 4.1** refers).

4.4 Relaxation of BHR to facilitate integrated design with CBS-2:KC and potential accommodation of aboveground carpark design

- 4.4.1 Under the intention of a combined development for the Application Site and CBS-2:KC, the proposed relaxation of BHR from 120mPD to 140mPD of the Application Site can align the height controls of the two projects, which provides the same building height profile for the two projects for holistic design, and the necessary vertical spatial flexibility to achieve a cohesive and optimised urban design across the project boundaries under a unified height limit.
- 4.4.2 The proposed minor relaxation of BHR at the Application Site allows for same maximum building height as of CBS-2:KC upon planning approval. It will “extinguish” the physical gap of 20mPD difference created by the project boundaries and thus allow greater design flexibility in building block layout and disposition under the same BHR of the two projects.
- 4.4.3 The relaxation can facilitate better urban design outcomes. For instance, it enables the adoption of slimmer residential building blocks, enhanced building separation and staggered building design, thereby allowing more flexibility in building form that could enhance visual comfort. The relaxation can also facilitate a less bulky podium design such as staggered-form podium with some outdoor event space on some floors. It can enhance the visual comfort and sunlight penetration at pedestrian level.
- 4.4.4 The proposed minor relaxation of BHR from 120mPD to 140mPD is comparable with the existing and planned surrounding context. It aligns with the adjoining CBS-2:KC, Lok Man Sun Chuen and Celestial Height, all with the same BHR of 140mPD. The proposed 140mPD shall fit harmoniously with the building height gradation of the area, which steps down gradually from 140 mPD to 100mPD from inland area near Lok Man Sun Chuen to the waterfront. (**Figure 2.3** refers).
- 4.4.5** Meanwhile, in line with the latest Government’s incentives to facilitate the provision of aboveground carpark in development projects, the proposed location of the carparks under the notional design may reference to the latest PNAP APP-2 published in November 2025, which permits full GFA exemption for up to two levels of aboveground carparks for both private and public car parks. **The proposed increase in BHR can facilitate the necessary design flexibility to accommodate the aboveground carparks if required, which would subject to detailed design.**

4.5 Enhance development flexibility and project's implementability

4.5.1 The Application Site is zoned "R(A)" under the OZP. There is no change of the zoning of the Application Site under the subject S16 Planning Application. The planning intention of the subject "R(A)" zone is to facilitate high-density residential development with commercial uses always permitted on the lowest three floors. The R(A) zone also controls the maximum domestic PR, maximum total PR, and maximum BHR; while minor relaxation of such may be considered by the TPB. The "R(A)" zone provides design flexibility of the development without control on the specific form and layout of the future development, which is considered necessary to facilitate project implementability to meet the market needs. The subject S16 Planning Application is a "non-scheme-based" submission, which tallies with the "R(A)" zone which controls mainly on the planning intention, uses and development parameters but not the specific building design.

4.5.2 Aligning the development controls of the Application Site with those of the adjoining CBS-2:KC is technically essential to materialize a holistic, "district-based" combined development across the two sites, as it enhances development flexibility, enabling a more cohesive layout that is vital to overcoming individual site constraints, optimizing pedestrian connectivity, and achieving a well-integrated urban design that benefits the wider neighborhood. Upon the subject S.16 planning approval, the Project will proceed with detailed design and subsequent GBP submissions for relevant government departments' approval, a concrete scheme layout can only be developed at the detailed design stage/ GBP submission stage for implementation.

4.6 Enhance flexibility for residential and commercial land uses allocation in response to market needs

4.6.1 In view of the high vacancy rates and ample supply of commercial properties, contrasted with the prevailing housing demand in recent years, the subject S16 Planning Application proposes to increase DPR from 7.5 to 8.0, while keeping the maximum total PR at 9.0. This minor relaxation could enhance the flexibility to optimise the mix of residential and commercial GFAs and potentially enable an increase in housing supply, while without increasing the overall development intensity of the Project.

4.7 Retain previously committed planning gains

4.7.1 The key planning gains and urban design features as proposed under the OZP Compliant Proposal, as mentioned in **Section 3.3** will be retained.

4.8 No Insurmountable technical impacts anticipated

4.8.1 Technical assessments have been conducted based on the notional design for the Application Site, the findings concluded that the Current Indicative Proposal would not induce any insurmountable technical impact in all aspects, including traffic, visual, air quality, noise, waste management, quantitative risk, drainage, sewerage, and water supply aspects. Relevant mitigation measures have been recommended where necessary.

No Adverse Traffic Impact

4.8.2 A Traffic Impact Assessment (TIA) (**Appendix A** refers) has been conducted and the findings shows that the Current Indicative Proposal will not induce any adverse traffic impact. Traffic improvements measures previously proposed for CBS-2:KC⁴ could cater for the traffic flow arising from this S16 Planning Application. All identified junctions will continue to operate with ample capacity in design year 2036 (i.e. 3 years after the tentative completion year of 2033).

No Adverse Visual Impact

4.8.3 A Visual Impact Assessment (VIA) (**Appendix B** refers) has been conducted for the Current Indicative Proposal. Comparing with the OZP Compliant Proposal, the anticipated changes in building mass will be limited, as the total PR remains unchanged at 9.0. The proposed minor increase in building height from 120mPD to 140mPD will only result in minor magnitude of visual change, as the Current Indicative Proposal generally blends in with the adjacent CBS-2:KC with 140mPD and no adverse visual impact is anticipated. **Table 4.1** below summarizes the visual sensitivity and impact of the selected VPs.

Table 4.1 – Summary of Visual Impacts

Viewing Points	Visual Sensitivity	Resultant Overall Visual Impact
VP 1: Lok Shan Road Sitting-out Area	High	Negligible
VP 2: To Kwa Wan Market at the Junction of Kowloon City Road and Lok Shan Road	Medium	Negligible
VP 3: Footpath of Ma Tau Wai Road opposite to Kiang Su Street	Medium	Slight

⁴ Traffic improvement measures for CBS-2:KC are recapped / outlined in the TIA report dated January 2025 for KC-020 OZP Compliant Proposal submitted to SDEV for consideration and the TIA report dated July 2025 for combined development of CBS-2:KC and KC-020, which the Transport Department (TD) had no in-principle objection on the assessments and the proposals provided in these two reports.

VP 4:	Entrance of Ko Shan Road Park	Medium	Negligible
VP 5:	Kau Pui Lung Road Playground	Medium	Negligible
VP 6:	Lok Man Sun Chuen at the Junction of Lok Shan Road and Kau Pui Lung Road	Medium	Negligible
VP 7:	Ma Tau Wai Road / Ma Hang Chung Road Rest Garden	Medium	Slight

No Adverse Air Quality Impact

- 4.8.4 An Air Quality Impact Assessment (AQIA) has been conducted (**Appendix C** refers) and the findings concluded that with the proposed fresh-air-intakes of the future development to be located above 4.55mAG (15.45mPD), it would comply with the prevailing Air Quality Objectives (AQOs). The future occupants are not anticipated to be subject to insurmountable air quality impact.

No Adverse Noise Impact

- 4.8.5 Assessment on the potential noise impact has been included in the EA report (**Appendix D** refers), which the assessment results indicated that with the proposed mitigation measures, such as provision of canopy, enhanced acoustic window, acoustic balcony, fixed glazing etc., a 96% compliance of HKPSG's road traffic noise standard of 70 dB(A) would be achieved and no adverse road traffic noise is anticipated. Furthermore, the assessment results also confirms that the subject S16 Planning Application would not be subject to adverse noise impact from fixed noise sources.

No Adverse Waste Management Impact

- 4.8.6 Assessment on the potential waste management impact has been included in the EA report (**Appendix D** refers) and the findings shows that with good site management and mitigation measures, no adverse waste management impact is anticipated.

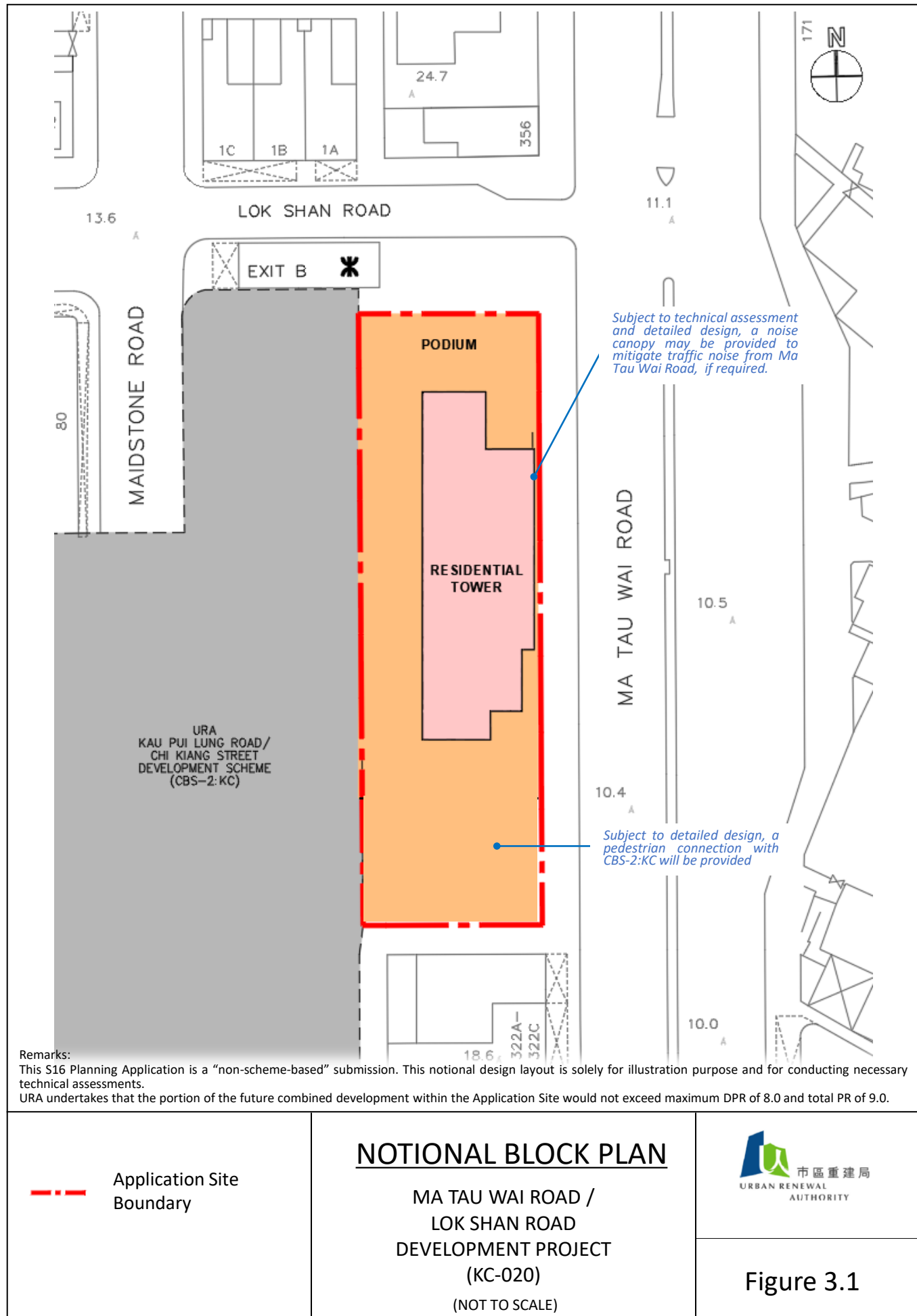
No Adverse Water Supply Impact

- 4.8.7 Assessment on the potential water supply impact has been included in the EA report (**Appendix D** refers) and the findings concluded that the planned / existing fresh and salt water supply systems in the vicinity are adequate to meet the demand arise from this S16 Planning Application.

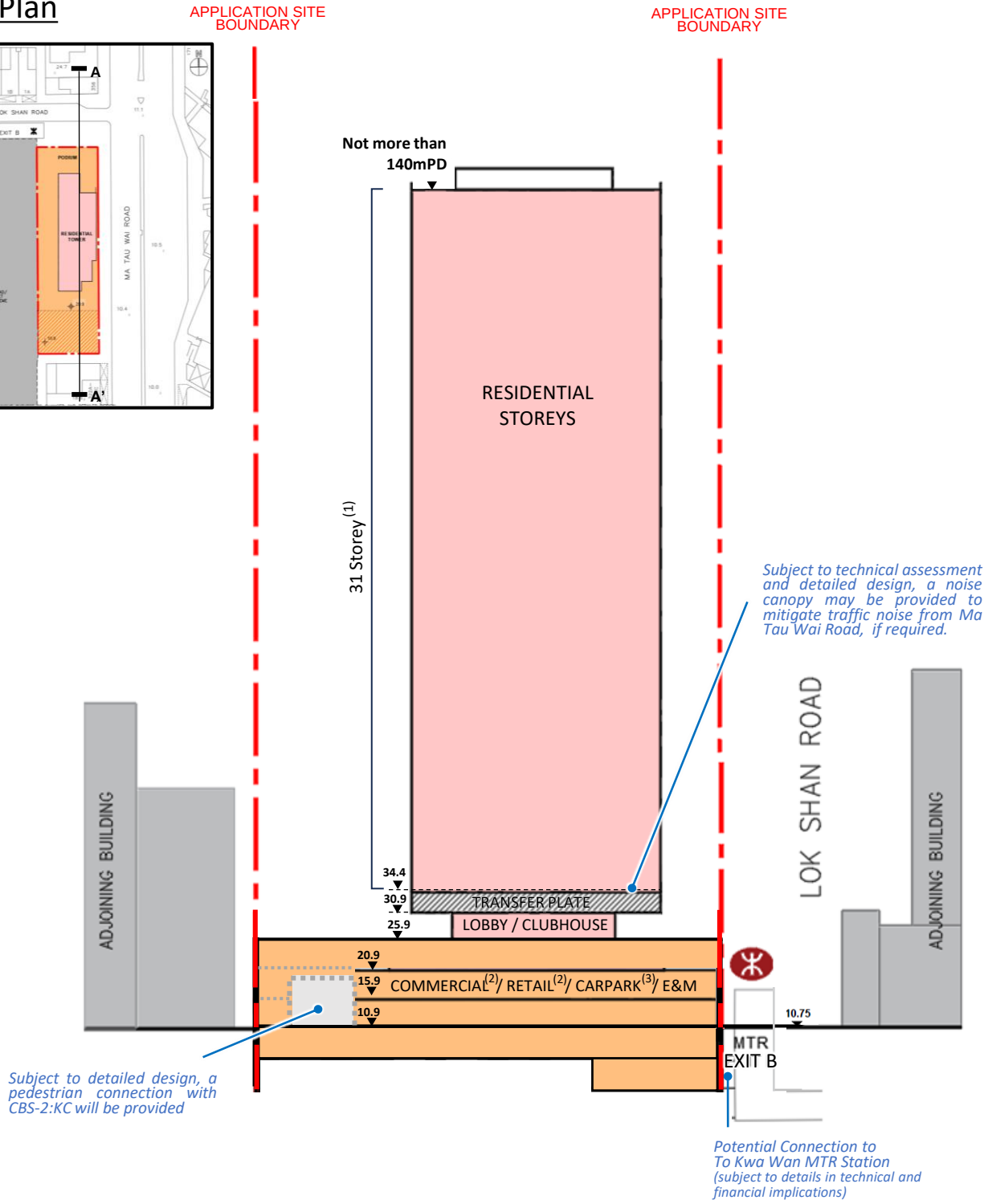
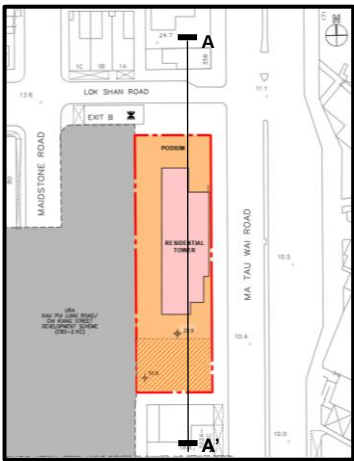
No Adverse Quantitative Risk Impact

5. CONCLUSION

- 5.1 The Application Site is the subject site of URA Ma Tau Wai Road/ Lok Shan Road Development Project (KC-020). Pursuing a district-based approach, it is intended to be holistically planned and designed to create synergy with the adjoining CBS-2:KC to optimize planning gains.
- 5.2 Notwithstanding that both the Application Site (i.e. KC-020) and the adjoining CBS-2:KC sites are subject to “R(A)” zoning, they are controlled by two different statutory plans under the planning regime. The Application Site is controlled by the Draft Ma Tau Kok Outline Zoning Plan No. S/K10/31 with maximum DPR of 7.5 and BHR of 120mPD. The adjoining CBS-2:KC, is controlled by the approved DSP No. S/K10/URA2/2 with maximum DPR of 8.0 and BHR of 140mPD.
- 5.3 To facilitate design flexibility for a cohesive combined development, this S16 Planning Application seeks TPB’s approval for:
- minor relaxation of maximum permissible DPR from 7.5 to 8.0;
 - BHR from 120mPD to 140mPD for the Application Site; and
 - proposed PVP use, which is currently a Column 2 use requiring planning permission from TPB.
- 5.4 The subject S16 Planning Application is a “non-scheme-based” submission. The notional design and indicative development parameters provided are solely for illustration purpose and for conducting necessary technical assessments.
- 5.5 Relevant technical assessments on traffic, visual, air quality, noise, waste management, quantitative risk, drainage, sewerage, and water supply aspects have been conducted and the findings concluded that the Current Indicative Proposal of the subject S16 Planning Application is technically feasible and no insurmountable problem is anticipated.
- 5.6 The subject S16 Planning Application is supported by the following development planning merits and justifications:
- Materialize holistic planning and implementation for combined development of two URA projects under “district-based” urban renewal approach;
 - Accommodate site constraints through a combined development with CBS-2:KC;
 - Enhance walkability and accessibility of the area;
 - Relaxation of BHR to facilitate integrated design with CBS-2:KC and potential accommodation of aboveground carpark design;
 - Maintain design flexibility and project implementability;
 - Enhance flexibility for residential and commercial land uses allocation in response to market needs;
 - Retain the previously committed planning gains; and
 - No Insurmountable technical impacts.



Key Plan



Remarks:

This S16 Planning Application is a “non-scheme-based” submission. This notional design layout is solely for illustration purpose and for conducting necessary technical assessments.

URA undertakes that the portion of the future combined development within the Application Site would not exceed maximum DPR of 8.0 and total PR of 9.0.

(1) Reference to typical floor-to-floor height of 3.3m to 3.5m adopted in Hong Kong’s private residential development.

(2) Not more than 3 storeys of commercial / retail uses will be accommodated within the basement and/or podium levels. Details will be worked out at detailed design stage.

(3) The proposed location of the carpark may reference to the latest PNAP APP-2, which permits full GFA exemption for up to two levels of above-ground carparks. Details will be worked out at detailed design stage.

Application Site Boundary

Residential Tower

Podium and Basement for Commercial / Retail/ Carpark/ E&M uses

NOTIONAL SECTION PLAN

MA TAU WAI ROAD /
LOK SHAN ROAD
DEVELOPMENT PROJECT
(KC-020)
(NOT TO SCALE)



市區重建局
URBAN RENEWAL
AUTHORITY

Figure 3.2

Appendix 2:

Replacement pages of the Application Form

(iv) For Type (iv) application 供第(iv)類申請

- (a) Please specify the proposed minor relaxation of stated development restriction(s) and **also fill in the proposed use/development and development particulars in part (v) below** –
請列明擬議略為放寬的發展限制並填妥於第(v)部分的擬議用途/發展及發展細節 –

- ☒ Plot ratio restriction 地積比率限制 From 由 Max Domestic PR: 7.5 至 至 Max Domestic PR: 8 ^[Note 2]
- ☐ Gross floor area restriction 總樓面面積限制 From 由sq. m 平方米 to 至sq. m 平方米
- ☐ Site coverage restriction 上蓋面積限制 From 由% to 至%
- ☒ Building height restriction 建築物高度限制
From 由m 米 to 至 m 米
From 由 120 mPD 米 (主水平基準上) to 至 140 mPD 米 (主水平基準上)
From 由 storeys 層 to 至 storeys 層
- ☐ Non-building area restriction 非建築用地限制 From 由m to 至 m
- ☐ Others (please specify) 其他 (請註明)

(v) For Type (v) application 供第(v)類申請

Note: The notional design and indicative development parameters of this S16 Planning Application are solely for illustration purpose and for conducting necessary technical assessments.

(a) Proposed use(s)/development
擬議用途/發展

Proposed Minor Relaxation of Domestic Plot Ratio and Building Height Restrictions for the Permitted Residential Development with Commercial / Retail uses of the URA Ma Tau Wai Road/ Lok Shan Road Development Project (KC-020), and Proposed Public Vehicle Park

(Please illustrate the details of the proposal on a layout plan 請用平面圖說明建議詳情)

(b) Development Schedule 發展細節表

- Proposed gross floor area (GFA) 擬議總樓面面積14,094..... sq.m 平方米 ☒ About 約
- Proposed plot ratio 擬議地積比率 Total PR: 9.0 (Max. Domestic PR: 8) ^[Note 2] ☐ About 約
- Proposed site coverage 擬議上蓋面積 Domestic: Not more than 37.5% Non-domestic below 15m; Not more than 100% % ^[Note 3] ☐ About 約
- Proposed no. of blocks 擬議座數1.....
- Proposed no. of storeys of each block 每座建築物的擬議層數35 ^[Note 4]..... storeys 層
☐ include 包括.....storeys of basements 層地庫
☒ exclude 不包括..2...storeys of basements 層地庫
- Proposed building height of each block 每座建築物的擬議高度 Not more than 140 mPD 米(主水平基準上) ☐ About 約
.....137.3 ^[Note 5]..... m 米 ☒ About 約

Note 2: URA undertakes that the portion of the future combined development within the Application Site would not exceed maximum Domestic PR of 8.0 and total PR of 9.0.

Note 3: Assumed in accordance with the First Schedule of Building (Planning) Regulation that for a Class B site with building height over 61m, the site coverage shall not exceed 37.5% for a domestic building or for the domestic part of a composite building, and shall not exceed 62.5% for a non-domestic building, or for the non-domestic part of a composite building. If the non-domestic podium does not exceed 15m in height, a site coverage of not more than 100% shall be permitted. The actual site coverage for the development at the Application Site will be determined at detailed design stage.

Note 4: Including 31 residential storeys, 1 storey for lobby/clubhouse and 3 storeys of podium floors.

Note 5: Measured from mean site formation level of about 2.7 mPD.

☒ Domestic part 住用部分		
GFA 總樓面面積	 12,528 ^[Note 6] sq. m 平方米	☒ About 約
number of Units 單位數目	 About 279	
average unit size 單位平均面積	 45 sq. m 平方米	☒ About 約
estimated number of residents 估計住客數目	 About 753	
☒ Non-domestic part 非住用部分		
<u>GFA 總樓面面積</u>		
☐ eating place 食肆	 sq. m 平方米	☐ About 約
☐ hotel 酒店	 sq. m 平方米	☐ About 約
(please specify the number of rooms 請註明房間數目)		
☐ office 辦公室	 sq. m 平方米	☐ About 約
☐ shop and services 商店及服務行業	 sq. m 平方米	☐ About 約
☐ Government, institution or community facilities 政府、機構或社區設施	(please specify the use(s) and concerned land area(s)/GFA(s) 請註明用途及有關的地面面積／總 樓面面積)	
☒ other(s) 其他	(please specify the use(s) and concerned land area(s)/GFA(s) 請註明用途及有關的地面面積／總 樓面面積) - Commercial/ Retail uses - Car Parking Facilities - Clubhouse, E&M and other ancillary facilities [Note 6 refers]	
☐ Open space 休憩用地		
☐ private open space 私人休憩用地	(please specify land area(s) 請註明地面面積) sq. m 平方米 ☐ Not less than 不少於	
☐ public open space 公眾休憩用地	 sq. m 平方米 ☐ Not less than 不少於	
(c) Use(s) of different floors (if applicable) 各樓層的用途 (如適用)		
[Block number] [座數]	[Floor(s)] [層數]	[Proposed use(s)] [擬議用途]
..... N/A	 B1- B2/ F, G/F, 1-2/F	 - Commercial ^[Note 7] / Retail ^[Note 7] / Car Parking Facilities ^[Note 8] / E&M
.....	 3/F	 - Lobby / Clubhouse
.....	 4/F - 34/F	 - Residential flats
.....		
.....		
(d) Proposed use(s) of uncovered area (if any) 露天地方 (倘有) 的擬議用途		
.....		
.....		
.....		

Note 6: The domestic and non-domestic PR/GFA are for illustrative purpose only. To allow flexibility and optimum use of development potential, development at the Application Site is subject to a maximum domestic PR of 8 and total PR of 9. The actual domestic and non-domestic PRs and GFAs would be worked out at detailed design stage.

Note 7: Not more than 3 storeys of commercial / retail uses will be accommodated within the basement and/or podium levels. Details will be worked out at detailed design stage.

Note 8: The proposed location of the carpark may reference to the latest PNAP APP-2, which permits full GFA exemption for up to two levels of above-ground car parks. Details will be worked out at detailed design stage.

Gist of Application 申請摘要

(Please provide details in both English and Chinese as far as possible. This part will be circulated to relevant consultees, uploaded to the Town Planning Board's Website for browsing and free downloading by the public and available at the Planning Enquiry Counters of the Planning Department for general information.)

(請盡量以英文及中文填寫。此部分將會發送予相關諮詢人士、上載至城市規劃委員會網頁供公眾免費瀏覽及下載及於規劃署規劃資料查詢處供一般參閱。)

Application No. 申請編號	(For Official Use Only) (請勿填寫此欄)		
Location/address 位置／地址	KIL 1692, 1712 RP, 1714 RP, 1782, 1806 RP, 1826 RP, 1827 RP, 1838 RP, 1846 RP, 2089 RP, 2091, 2103 S.A RP, 2103 RP, 2104 RP, 2105, 2181(i.e. Nos. 324 – 354 Ma Tau Wai Road (even nos. only)) and the Adjoining Government Land 九龍內地段第1692號、第1712號餘段、第1714號餘段、第1782號、第1806號餘段、第1826號餘段、第1827號餘段、第1838號餘段、第1846號餘段、第2089號餘段、第2091號、第2103號A分段餘段、第2103號餘段、第2104號餘段、第2105號及第2181號 (即馬頭圍道324至354號(雙數))及毗鄰的政府土地		
Site area 地盤面積	1,566	sq. m 平方米	☒ About 約
	(includes Government land of 包括政府土地 213	sq. m 平方米	☒ About 約)
Plan 圖則	Draft Ma Tau Kok Outline Zoning Plan No. S/K10/31 馬頭角分區計劃大綱草圖編號S/K10/31		
Zoning 地帶	"Residential (Group A)" zone 「住宅(甲類)」地帶		
Applied use/ development 申請用途／發展	Proposed Minor Relaxation of Domestic Plot Ratio and Building Height Restrictions for the Permitted Residential Development with Commercial / Retail uses of the URA Ma Tau Wai Road/Lok Shan Road Development Project (KC-020), and Proposed Public Vehicle Park 擬議略為放寬最高住用地積比率及建築物高度限制以作准許的市建局馬頭圍道／落山道發展項目(KC-020)住宅發展及商業／零售用途及擬議公眾停車場		
(i) Gross floor area and/or plot ratio 總樓面面積及／或地積比率		sq.m 平方米	Plot Ratio 地積比率
	Domestic 住用	12,528 sq.m. ☒ About 約 ☐ Not more than 不多於	[Note 1 / 註一] ☐ About 約 8 ☒ Not more than 不多於
	Non-domestic 非住用	[Note 2 / 註二] ☐ About 約 ☐ Not more than 不多於	[Note 1 / 註一] ☐ About 約 [Note 2 / 註二] ☐ Not more than 不多於
(ii) No. of block 幢數	Domestic 住用		
	Non-domestic 非住用		
	Composite 綜合用途	1	

Note 1: URA undertakes that the portion of the future combined development within the Application Site would not exceed maximum Domestic PR of 8.0 and total PR of 9.0.

註一: 市建局承諾於未來的發展項目中座落於本申請地點範圍內之發展部分, 其最高住用地積比率不會超過 8.0 倍, 最高總地積比率亦不會超過 9.0 倍。

Note 2: To allow flexibility and optimum use of development potential, development at the Application Site is subject to a maximum domestic PR of 8 and total PR of 9. The actual domestic and non-domestic PRs and GFAs would be worked out at detailed design stage.

註二: 為提供發展彈性及充分發揮發展潛力, 申請地點的發展將受最高住用地積比率8倍及總地積比率9倍的限制。實際的住用及非住用地積比率與總樓面面積將於詳細設計階段確定。

(iii) Building height/No. of storeys 建築物高度／層數	Domestic 住用	m 米 ☐ (Not more than 不多於)	
		mPD 米(主水平基準上) ☐ (Not more than 不多於)	
		Storeys(s) 層 ☐ (Not more than 不多於) (☐ Include 包括 ☐ Exclude 不包括 ☐ Carport 停車間 ☐ Basement 地庫 ☐ Refuge Floor 防火層 ☐ Podium 平台)	
	Non-domestic 非住用	m 米 ☐ (Not more than 不多於)	
		mPD 米(主水平基準上) ☐ (Not more than 不多於)	
		Storeys(s) 層 ☐ (Not more than 不多於) (☐ Include 包括 ☐ Exclude 不包括 ☐ Carport 停車間 ☐ Basement 地庫 ☐ Refuge Floor 防火層 ☐ Podium 平台)	
	Composite 綜合用途	About 137.3 ^[Note 3 / 註三] m 米 ☐ (Not more than 不多於)	
		140 mPD 米(主水平基準上) ☒ (Not more than 不多於)	
		35 Storeys(s) 層 ☐ (Not more than 不多於) (☐ Include 包括 ☒ Exclude 不包括 ☐ Carport 停車間 2 storeys 2層 ☒ Basement 地庫 ☐ Refuge Floor 防火層 ☐ Podium 平台)	
(iv) Site coverage 上蓋面積	Domestic: Not more than 37.5% Non-domestic below 15m: Not more than 100% ☐ About 約		
(v) No. of units 單位數目	About 279		
(vi) Open space 休憩用地	Private 私人	sq.m 平方米 ☐ Not less than 不少於	
	Public 公眾	sq.m 平方米 ☐ Not less than 不少於	

Note 3: Measured from mean site formation level of about -4 mPD.
註三: 由約主水平基準面以上2.7米 (+2.7 mPD) 的平均地盤平整水平起計。

(vii) No. of parking spaces and loading / unloading spaces 停車位及上落客貨車位數目	Total no. of vehicle parking spaces 停車位總數	143 [Note 4 / 註四]
	Private Car Parking Spaces 私家車車位 58 Motorcycle Parking Spaces 電單車車位 5 Light Goods Vehicle Parking Spaces 輕型貨車泊車位 – Medium Goods Vehicle Parking Spaces 中型貨車泊車位 – Heavy Goods Vehicle Parking Spaces 重型貨車泊車位 – Others (Please Specify) 其他 (請列明) – Public Vehicle Park 公眾停車場 [Note 4 / 註四] Not more than 80 nos. of PVP for private cars	
	Total no. of vehicle loading/unloading bays/lay-bys 上落客貨車位／停車處總數	3
	Taxi Spaces 的士車位 – Coach Spaces 旅遊巴車位 – Light Goods Vehicle Spaces 輕型貨車車位 1 Medium Goods Vehicle Spaces 中型貨車車位 – Heavy Goods Vehicle Spaces 重型貨車車位 2 Others (Please Specify) 其他 (請列明) –	

Submitted Plans, Drawings and Documents 提交的圖則、繪圖及文件

	Chinese 中文	English 英文
Plans and Drawings 圖則及繪圖		
Master layout plan(s)/Layout plan(s) 總綱發展藍圖／布局設計圖	☐	☐
Block plan(s) 樓宇位置圖	☐	☒
Floor plan(s) 樓宇平面圖	☐	☐
Sectional plan(s) 截視圖	☐	☒
Elevation(s) 立視圖	☐	☐
Photomontage(s) showing the proposed development 顯示擬議發展的合成照片	☐	☒
Master landscape plan(s)/Landscape plan(s) 園境設計總圖／園境設計圖	☐	☐
Others (please specify) 其他 (請註明)	☐	☒
Location Plan [位置圖], Site Plan [地盤平面圖], Extract of the Existing Statutory Plans [現行法定圖則摘要圖], Site and Surrounding Context [申請地點及周邊狀況圖], Notional Design under combined development of KC-020 and CBS-2:KC (Master Layout) [KC-020 與 CBS-2:KC 概念設計 (總體布局) 圖], Notional Design under combined development of KC-020 and CBS-2:KC (Section) [KC-020 與 CBS-2:KC 概念設計 (截視) 圖], Enhanced Walkability and Accessibility of the To Kwa Wan Area [優化土瓜灣區的行人暢達性與連接性]		
Reports 報告書		
Planning Statement/Justifications 規劃綱領/理據	☐	☒
Environmental assessment (including Noise, Waste Management and Water Supply Impact Assessments) 環境評估 (包括噪音、廢物管理及供水影響評估)	☐	☒
Traffic impact assessment (on vehicles) 就車輛的交通影響評估	☐	☒
Traffic impact assessment (on pedestrians) 就行人的交通影響評估	☐	☒
Visual impact assessment 視覺影響評估	☐	☒
Landscape impact assessment 景觀影響評估	☐	☐
Tree Survey 樹木調查	☐	☐
Geotechnical impact assessment 土力影響評估	☐	☐
Drainage impact assessment 排水影響評估	☐	☒
Sewerage impact assessment 排污影響評估	☐	☒
Risk Assessment 風險評估	☐	☒
Others (please specify) 其他 (請註明)	☐	☒
Air Quality Impact Assessment 空氣質量影響評估		
Note: May insert more than one 「✓」. 註：可在多於一個方格內加上「✓」號		

Note 4: No PVP is required for KC-020, under the intention of combined site development for KC-020 and CBS-2:KC, the proposed PVP use is to allow design flexibility and avoid further s.16 planning permission to be sought in case some PVP spaces as required in CBS-2:KC might need to be provided within the Application Site area due to site constraints and/or integrated design consideration. This proposed PVP use does not necessarily mean there must be certain amount of PVP provision in the Application Site. The proposed provisions are for illustrative purpose only subject to detailed design.

註四：KC-020並不需要提供公眾停車場，擬議的公眾停車場旨在與毗鄰CBS-2:KC的整體發展時提供靈活性，以避免如因地盤限制及/或設計考慮而需在申請地點內提供CBS-2:KC要求的某些公眾停車位時再次申請s.16規劃許可，並不代表申請地點必會提供公眾停車場。擬議公眾停車場的車位種類及數目僅供參考，具體細節將在詳細設計階段決定。

Appendix 3:

Replacement pages of the Visual Impact Assessment

- 1.7. To support the S16 Planning Application, this VIA report is prepared to assess the potential visual impact arise by the S16 Planning Application in accordance with the **TPB Guideline No. 41A** – Guidelines on Submission of Visual Impact Assessment for Planning Applications to the Town Planning Board (**TPB PG-No. 41A**).
- 1.8. Given the Application Site locates immediately next to CBS-2:KC, this VIA report has made reference to the selected viewpoints of the VIA report for CBS-2:KC dated February 2023, which the Urban Design & Landscape Section of Planning Department (UD&L, PlanD) had no in-principle objection on the assessment provided therein. **The selected viewpoints have covered all four cardinal directions and included short-to-long range views as per TPB PG-No. 41A.** The notional design of the OZP compliant proposal of KC-020 authorised by SDEV in August 2025 (OZP Compliant Proposal) (Appendix 1 refers) and the notional design of CBS-2:KC has been adopted as the baseline visual condition.
- 1.9. This VIA report will cover the followings:
- | | |
|------------|---|
| Section 2: | describes the indicative development proposal under the current S16 Planning Application; |
| Section 3: | identifies the area of assessment and the visual context of the Application Site; |
| Section 4: | identifies the key visual sensitive receivers; |
| Section 5: | appraises the potential visual impacts induced by the S16 Planning Application; and |
| Section 6: | summarizes the findings of the VIA. |

Table 2.1: Comparison of the OZP Compliant Proposal and Current Indicative Proposal

Development Parameters	OZP Compliant Proposal ⁽¹⁾ [A]	Current Indicative Proposal (Subject S16) [B]	Difference [B]-[A] (% change)
Site Area⁽²⁾ - Application Site Area (for PR Calculation) (m ²)	About 1,566	About 1,566	No change
Maximum PR - Total PR - Domestic PR	9.0 7.5	9.0 8.0	No change +0.5 (+6.7%)
GFA⁽²⁾ Total GFA (m ²) Domestic GFA (m ²)	About 14,094 About 11,745	About 14,094 About 12,528	No change +783 (+6.7%)
Max. BH (mPD)	120	140	+20 (+16.7%)
Under Notional Design:			
No. of Residential Towers	1	1	No change
No. of Residential Floors	About 29 floors	About 31 floors	+2 (+6.9%)
No. of Retail Floors	Not more than 3 storeys	Not more than 3 storeys ⁽³⁾	No change
Average Flat Size (m²)	About 45 ⁽⁴⁾	About 45	No change ⁽⁴⁾
No. of Flats	About 263 ^{(4) (5)}	About 279 ⁽⁶⁾	+16 (+6.0%) ⁽⁴⁾
Anticipated Population⁽⁷⁾	About 710 ⁽⁴⁾	About 753	+43 (+6.0%) ⁽⁴⁾
Site Coverage⁽⁸⁾	Domestic portion: Not more than 37.5% Non-domestic portion below 15m: Not more than 100%	Domestic portion: Not more than 37.5% Non-domestic portion below 15m: Not more than 100%	No change

Remarks:

- (1) As per the notional design under the URA Ma Tau Wai Road/ Lok Shan Road Development Project (KC-020) authorized by SDEV in August 2025 (the DP authorised by SDEV).
- (2) Based on the net site area under the latest land boundary survey, subject to agreement with LandsD in the land grant application stage. For reference, the net site area under the DP authorised by SDEV was about 1,578sq.m., the corresponding total GFA was about 14,202sq.m. and domestic GFA was about 11,835 sq.m.
- (3) Not more than 3 storeys of commercial / retail uses will be accommodated within the basement and/or podium levels. Details will be worked out at detailed design stage.
- (4) For a like-to-like analysis, an average flat size of about 45 sq.m. under the Current Indicative Proposal has been applied to both the OZP compliant and current S16 scenarios in the comparison table to show the net increase in the number of flats and population. For reference, the notional design for the DP

authorised by SDEV had adopted an average flat size of about 51 sq.m. with about 232 no. of flats and an estimated population of about 626.

- (5) Estimated based on average flat size, the actual no. of flats would be worked out at detailed design stage.*
- (6) Estimated based on notional design with 9 nos. of domestic units per typical floor, the actual no. of flats would be worked out at detailed design stage.*
- (7) Derived by assuming 2.7 occupants as per the average domestic household size in Kowloon City District based on Population Census 2021.*
- (8) Assumed in accordance with the First Schedule of Building (Planning) Regulation that for a Class B site with building height over 61m, the site coverage shall not exceed 37.5% for a domestic building or for the domestic part of a composite building. The non-domestic podium does not exceed 15m in height, a site coverage of not more than 100% shall be permitted. The actual site coverage for the development at the Application Site will be determined at detailed design stage.*

2.6. All previously committed planning gains under the OZP Compliant Proposal have been retained, including:

- Adopting holistic site planning and urban design with the adjoining CBS-2:KC to create a cohesive and integral built environment, with proposed shared-use of vehicular run in/out(s) to maintain street vibrancy along Ma Tau Wai Road;
- Capitalizing the existing pedestrian-crossing facilities at Ma Tau Wai Road and CBS-2:KC to enhance linkage between the east and west of Ma Tau Wai Road, i.e. from the Lok Man Sun Chuen residential cluster to the POS and GIC clusters at the eastern side of Ma Tau Wai Road, enhancing spatial connectivity at-grade; and
- Subject to further technical feasibility study, explore to integrate with To Kwa Wan MTR station and the commercial portion of CBS-2:KC via underground connection to enhance overall accessibility and connectivity to the proposed underground connection.

3. AREA OF ASSESSMENT

3.1 Baseline Visual Condition

- 3.1.1 To comprehensively appraise the potential visual impacts arising from the Current S16 Planning Proposal, the OZP Compliant Proposal authorised by SDEV in August 2025, with maximum DPR of 7.5, total PR of 9.0 and BHR of 120mPD, will serve as baseline visual condition of the Application Site to assess the visual changes. The Notional Design of the OZP Compliant Proposal is provided in **Appendix 1** and its indicative development parameters is available in **Table 2.1**.
- 3.1.2 The notional design of CBS-2KC have also been incorporated as the baseline visual condition, as the purpose of the subject S16 Planning Application is to facilitate for a cohesive combined development of the Application Site and CBS-2:KC.

3.2 Area of Visual Influence (AVI)

- 3.2.1 According to **TPB PG-No. 41A**, the assessment area (i.e., the visual envelope) should cover the AVI within which the future development at the Application Site is pronouncedly visible from key sensitive viewers. The assessment area for the VIA is defined by the visual envelope ("VE") of the Application Site. The VE has taken 3 times of the proposed building height of the proposed development. **Since the actual building height as per the notional design for the Current S16 Planning Proposal is about 130m (i.e. the proposed BHR of 140mPD minus the site formation level of 10.9mPD), the VE is therefore covering a radial area of about 390m (i.e. 130m x 3).**
- 3.2.2 As indicated in **Figure 3.1**, the assessment area extends to a residential development known as Majestic Park and part of Horae Place to the north, includes portion of mid-rise residential developments namely On Wo Yuen and Wyler Gardens to the east, part of Chat Ma Mansion and the URA's Kowloon City Action Area 1 (KCAA1) to the south, and Sheung Lok Street to the west.
- 3.2.3 Given the Application Site adjoins immediately to CBS-2:KC, this VIA has made reference to the selected viewpoints in the VIA report for CBS-2:KC DSP dated February 2023, which UD&L, PlanD had no in-principle objection on the assessment provided therein.
- 3.2.4 On the selection of strategic viewing point (SVP), the Application Site falls outside the view fans from all eight SVPs identified by the Planning Department (PlanD) for assessing visual impact to the ridgelines and the harbour. Same as identified in the VIA for CBS-2:KC DSP, both CBS-2:KC and the Application Site fall outside the view of SVP5 (Hong Kong Convention & Exhibition Centre), which is the most possible SVP that

4. KEY VISUAL SENSITIVE RECEIVERS AT LOCAL VIEWPOINTS

- 4.1 As per the requirements of **TPB PG-No. 41A**, key visually sensitive receivers (VSRs) are those people, who have views of the Application Site from the most affected VPs in the AVI, and they are most likely to be affected by the proposed visual change. The identified VSRs of the VIA include the public at popular areas for outdoor activities, recreation, rest, leisure and prominent travel routes where their visual attention may be caught by the proposed development.
- 4.2 VSRs are categorised based on the characters and what they engage in the public VPs. The sensitivity of receives of visual changes will be influenced by:
- 1) The activities they are engaged in;
 - 2) The duration for which the proposed development remains visible;
 - 3) View towards the change is full or partial; and
 - 4) The public perception towards the portion of the proposed development.
- 4.3 With consideration of the nature of the people who are mostly affected by the proposed visual changes at the key VPs, the selected VSRs of the subject VIA are categorised into two groups, namely;
- 1) **Recreation** – General public has sights on the Notional Design of the Application Site while engaging in recreational facilities. Their visual sensitivity varies depending on the type of recreational activity they are engaging in.
 - 2) **Traveller** – General public has sights on the Notional Design of the Application Site in public passageways. Their visual experience depends on the speed of travel and whether their views will be continuous or occasional.
- 4.4 Based on the above criteria, the visual sensitivity of VSRs from the VPs are categorized into 3 grades (i.e. “High”, “Medium”, and “Low”), depending on the duration of stay at the VPs. For example, the visual sensitivity of VSRs from public open spaces is classified as “High”, while the visual sensitivity of travellers is classified as “Low”.
- 4.5 **Table 4.1** lists the visual sensitivity of the selected VSRs at the selected VPs.

Visually Sensitive Receiver and Type of User (Recreation and/or Traveller)	Approx. Viewing Distance	Quality of Existing View (Good / Fair / Poor)	Degree of Visibility on the Notional Design of the Application Site (Full /Partial / Glimpsed) Frequency of View of the Notional Design of the Application Site (Frequent / Occasional / Rare)	Sensitivity
Type of User: Traveller				
VP 3: Footpath of Ma Tau Wai Road opposite to Kiang Su Street VSR: Nearby residents, business operators / workers, pedestrians/ drivers along Ma Tau Wai Road Type of User: Traveller	About 120m to the east of the Application Site	Fair – An oblique view of the southeastern boundary of the Application Site, capturing the existing buildings along both sides of Ma Tau Wai Road, wide pavement in the foreground and an obstructed sky-view in the background.	Partial View – The view is partially screened off by existing buildings along Ma Tau Wai Road. Rare View – Low level of pedestrian activity is observed at this VP, with mainly users of this footpath who are traveling for work at the buildings located at the east of Ma Tau Wai Road. This VP offers a rare view, as the VSRs are mostly transient in nature, with short duration of stay and major attention on the road/ traffic conditions.	Medium
VP 4: Entrance of Ko Shan Road Park VSR: Visitors to the Park, nearby residents and pedestrians	About 311m to the south of the Application Site	Fair – The view of the southwestern boundary of the Application Site, capturing the trees at the entrance of Ko Shan Road Park on the left, and a low-rise building (i.e. The Church Of The Good Shepherd) on the right in the foreground, and a sky view partially	Not visible – The view is completely screened off by the existing trees at the entrance of Ko Shan Road Park and CBS-2:KC.	Medium

Visually Sensitive Receiver and Type of User (Recreation and/or Traveller)	Approx. Viewing Distance	Quality of Existing View (Good / Fair / Poor)	Degree of Visibility on the Notional Design of the Application Site (Full / Partial / Glimpsed) Frequency of View of the Notional Design of the Application Site (Frequent / Occasional / Rare)	Sensitivity
Type of User: Recreation/ Traveller		obstructed by existing medium to high-rise buildings.		
VP 5: Kau Pui Lung Road Playground VSR: Facility users, nearby residents Type of User: Recreation	About 200m to the west of the Application Site	Good – This VP provides an elevated view of the southern boundary of the Application Site, capturing Lok Man Sun Chuen at the front and a good view of the sky slightly obstructed by medium to high-rise buildings.	Glimpsed View – The view is mostly screened by Lok Man Sun Chuen, various high-rise residential developments (e.g. City 151, 80 Maidstone Road and 51-57 Maidstone Road (under constructions)) as well as CBS-2:KC. Rare View – Although recreational users who rest and/or engage in activities (e.g. playing basketball) have been observed, the frequency of views is considered rare due to the obstruction caused by existing buildings and CBS-2:KC.	Medium
VP 6: Lok Man Sun Chuen at the Junction of Lok Shan Road and Kau Pui Lung Road	About 94m to the west of the Application Site	Poor – An oblique view of the northwestern boundary of the Application Site dominated by the continuous building mass along Lok Shan Road with limited sky view.	Glimpsed View – The view is mostly screened off by existing buildings as well as CBS-2:KC. Occasional View – While the VSRs of this VP are primarily pedestrians passing by Kau Pui Lung Road and Lok Shan Road, who are	Medium

5 ASSESSMENT OF VISUAL IMPACTS

5.1 Methodology for the Appraisal of Visual Impacts

5.1.1 With reference to TPB PG-No. 41A, visual changes could be positive or negative and they are not necessarily mutually exclusive. In considering the effect of visual changes, it covers the following three aspects::

- 1) Visual Composition (i.e., to assess the visual effects resulted from changes in massing, heights, disposition, forms etc. viz the overall visual backdrop);
- 2) Visual Obstruction (i.e., to assess the degree of visual obstruction and loss of views or visual openness due to the proposed development); and
- 3) Visual Change (i.e., to assess the visual changes from key public viewing points with a direct sightline to the proposed development).

5.1.2 The resultant overall visual impact will be categorized into the following ranges of threshold:

Table 5.1 – Classification of Overall Visual Impacts

Classification	Description
Beneficial	The project will complement the visual character of its setting, and/or will improve overall visual quality;
Negligible	The project has no noticeable effects or insignificant visual effects
Slight	The project causes slight adverse visual effects.
Moderate	The project causes some adverse visual effects, but these can be eliminated, reduced or moderated to a certain extent by design/mitigation measures.
Substantial	The project causes adverse effects that are considered too excessive and obstructive, and significant modification is required to mitigate the impacts.

5.2 Appraisal of Visual Impacts

5.2.1 For the visual appraisal of the local VPs, photomontages of three development scenarios will be prepared for comparison of the changes before and after development of the Notional Design at the Application Site, namely:

Table 5.2 – Appraisal of Visual Impacts of Selected Viewpoints

Location of VP	Distance and Direction from the Application Site:	VSR Type	Visual Composition	Visual Obstruction	Visual Change	Resultant Overall Visual Impact
VP 1: Lok Shan Road Sitting-out Area	About 40m to the east of the Application Site	Recreation/ Traveller	As shown in Figure 5.1, the visual composition of this VP features low to medium - rise residential buildings along Ma Tau Wai Road with part of Lok Man Sun Chuen at the back. Both the OZP Compliant Proposal and the Current S16 Planning Proposal (both proposals) will inevitably visible with a large building mass at this VP due to its close proximity to the Application Site. Comparing with the OZP Compliant Proposal, the visual composition remains the same and the effect of Current S16 Planning Proposal on visual composition is considered negligible.	The visual openness to the sky is already partially obstructed by the existing low to medium rise buildings along Ma Tau Wai Road. Both proposals will result in further obstruction of the sky view, nevertheless a portion of the sky view is still visible. Comparing to the OZP Compliant Proposal, the visual openness and permeability remains the same. Therefore, the impact of visual obstruction to the established VP is negligible.	The key visual elements are the existing buildings and partially obstructed sky view. Under both proposals, the podium and the lower floors of the proposed tower will be visible and become a dominant visual element, which would reduce the existing sky view. Nevertheless, if compared with the OZP Compliant Proposal, there is no change in visual elements. Thus, the magnitude of visual change from this VP is appraised as negligible.	Negligible

Location of VP	Distance and Direction from the Application Site:	VSR Type	Visual Composition	Visual Obstruction	Visual Change	Resultant Overall Visual Impact
VP 2: To Kwa Wan Market at the Junction of Kowloon City Road and Lok Shan Road	About 100m to the east of the Application Site	Traveller	As shown in Figure 5.2, the visual composition of this VP features the To Kwa Wan Market and various medium to high-rise buildings (e.g. Celestial Heights, 80 Maidstone Road and City 151). The building mass under both proposals, which aligns with the adjoining CBS-2:KC, will be visible behind the To Kwa Wan Market. Comparing to the OZP Compliant Proposal, the visual composition remains the same and thus the effect on visual composition is considered negligible.	The existing view of this VP is dominated by an urbanised skyline with a partially obstructed sky view. CBS-2:KC will further block the existing sky view. Despite the proposed tower under both proposals will result in further obstruction of the sky view, the visual openness and visual permeability remains unchanged when compared with the OZP Compliant Proposal. Thus, the impact of visual obstruction to the established VP is negligible.	The key visual elements in this VP include the To Kwa Wan Market and medium to high-rise residential buildings at the back and the partially obstructed sky view. While the proposed tower under both proposals will be visible and form a dominant visual element in this VP, no change on visual elements and resources will be induced by Proposed S16 Planning Proposal when comparing to the OZP Compliant Proposal. Thus, the magnitude of visual change from this VP is appraised as negligible.	Negligible
VP 3: Footpath of Ma Tau Wai Road	About 120m to the southeast of the Application Site	Traveller	As shown in Figure 5.3 , the visual composition of this VP mainly includes the existing buildings	The existing sky view is already partially obstructed by the existing	Despite the slight visual change brought by the Current S16 Planning Proposal, the impact on	Slight

Location of VP	Distance and Direction from the Application Site:	VSR Type	Visual Composition	Visual Obstruction	Visual Change	Resultant Overall Visual Impact
opposite to Kiang Su Street			along both sides of Ma Tau Wai Road (e.g. Lucky Building, Kwong Yiu Building, Mai Lok Building, 6-10 Maidstone Road and 18 Farm Road etc.). Comparing to the OZP Compliant Proposal, the visual composition remains largely the same with only minor increase in building height which is compatible with CBS-2KC and the surrounding existing developments, thus the effect on visual composition is considered as slight.	buildings along both sides of Ma Tau Wai Road. The open sky view and visual openness will only result in minor additional obstruction when compared with the OZP Compliant Proposal. Therefore, the impact of visual obstruction to the established VP is slight.	key visual elements at this VP, namely the existing buildings along both sides of Ma Tau Wai Road and the partially obstructed sky view, is very minor when compared to the OZP Compliant Proposal. Thus, the magnitude of visual change from this VP is appraised as slight.	
VP 4: Entrance of Ko Shan Road Park	About 311m to the south of the Application Site	Traveller / Recreation	As shown in Figure 5.4 , the visual composition of this VP captures the trees at the entrance of Ko Shan Road Park on the left, a low-rise	The visual openness to the sky is already partially blocked by the existing trees and buildings.	The visual elements at this VP are dominated by the existing tree and buildings with limited sky view and the proposed tower is not visible at this	Negligible

Location of VP	Distance and Direction from the Application Site:	VSR Type	Visual Composition	Visual Obstruction	Visual Change	Resultant Overall Visual Impact
			building (i.e. The Church Of The Good Shepherd) and a mix of low to high-rise buildings. The proposed building mass is not visible at this VP in both proposals as it has been completely screen off the existing tress and CBS-2:KC. As such the degree of change in visual composition is considered negligible.	Meanwhile, as the proposed tower is not visible at this VP under both proposals, negligible visual obstruction or impacts on visual permeability is anticipated.	VP under both proposal, there will be negligible change to the existing visual elements and resources.	
VP 5: Kau Pui Lung Road Playground	About 200m to the west of the Application Site	Recreation/ Traveller	As shown in Figure 5.5, the visual composition of this VP features Lok Man Sun Chuen in the foreground and various middle to high-rise buildings (City 151, 80 Maidstone Road and 51-57 Maidstone Road (under constructions)). The visual composition remains largely the	This VP possess a relatively open sky view with only a small degree of visual obstruction by the existing medium to high-rise buildings at the foreground. The visual openness and permeability remains largely the same in both proposals, as the proposed tower has been	The visual elements at this VP are dominated by a relatively good sky view under an urban setting with Lok Man Sun Chuen and various existing buildings. The proposed tower will be largely blocked by and blends in with CBS-2:KC and the existing	Negligible

Location of VP	Distance and Direction from the Application Site:	VSR Type	Visual Composition	Visual Obstruction	Visual Change	Resultant Overall Visual Impact
			same, with building mass in both proposals has been largely screened off by CBS-2:KC. Nevertheless, it is noted minor increase in building height in the Current S16 Planning Proposal when comparing with the OZP Compliant Proposal, which is compatible with the future CBS-2KC and the surrounding existing developments. Thus, the effect on visual composition is considered negligible.	largely screened by CBS-2:KC. Thus, the effect on visual obstruction is considered negligible.	buildings under both proposal. The degree of visual change on visual elements and resources is negligible when compared to the OZP Compliant Proposal.	
VP 6: Lok Man Sun Chuen at the Junction of Lok Shan Road and Kau Pui Lung Road	About 94m to the west of the Application Site	Traveller	As shown in Figure 5.6 , the visual composition of this VP is framed by existing buildings mass along Lok Shan Road, namely Fu Yu Court on the left and Morning Joy Building and 80 Maidstone Road on the right.	The existing sky view is limited and largely blocked by the existing buildings along both sides of Lok Shan Road. Meanwhile, as the proposed tower is not visible at this VP under both proposals, no visual	The visual elements at this VP include the continuous building mass along Lok Shan Road with limited sky view, and the proposed tower is not visible at this VP under both proposals, there will be no change	Negligible

Location of VP	Distance and Direction from the Application Site:	VSR Type	Visual Composition	Visual Obstruction	Visual Change	Resultant Overall Visual Impact
			The proposed building mass is not visible at this VP in both proposals as it has been completely screen off the existing tress and CBS-2:KC. As such the degree of change on visual composition is considered negligible .	obstruction or impacts on visual permeability is anticipated. Thus, the effect on visual obstruction is considered negligible .	to the existing visual elements and resources. Thus, the effect of visual change is considered negligible .	
VP 7: Ma Tau Wai Road / Ma Hang Chung Road Rest Garden	About 250m to the north of the Application Site	Traveller	As shown in Figure 5.7 , the visual composition of this VP mainly consists of an existing tree, crossing facilities with a traffic light and various medium to high-rise buildings along Ma Tau Wai Road. The building mass under both proposals, which is compatible with CBS-2:KC and the surrounding existing buildings will be visible	The existing sky view is limited and largely block by the existing buildings along both sides of Ma Tau Wai Road. CBS-2:KC will further block the existing sky view upon development. Despite the proposed tower under both proposals will result in further obstruction of the sky view, the visual openness and visual permeability remains unchanged. Thus, the	The visual elements at this VP includes the vibrant streetscape of Ma Tau Wai Road with narrow sky view. CBS-2:KC will also form as part of the visual element upon development. While the proposed tower under both proposals will be visible and form as a visual element in this VP, minor change on visual elements and resources	Slight

Location of VP	Distance and Direction from the Application Site:	VSR Type	Visual Composition	Visual Obstruction	Visual Change	Resultant Overall Visual Impact
			behind the To Kwa Wan Market. Comparing to the OZP Compliant Proposal, there is minor change in visual composition, mainly cause by the minor increase in building height in the Current S16 Planning Proposal. The effect on visual composition is considered as slight.	effect on visual obstruction is considered slight.	will be induced by Proposed S16 Planning Proposal when comparing to the OZP Compliant Proposal. Thus, the magnitude of visual change is considered as slight.	

6 EVALUATION OF OVERALL VISUAL IMPACT

6.1 This VIA is submitted to evaluates the degree of visual impacts on VSRs from major public VPs arise by the subject S16 Planning Application. The notional design of the OZP Compliant Proposal authorized by SDEV in August 2025, along with the notional design for CBS-2:KC, is adopted as the baseline visual condition to access the potential impact arise by the Current S16 Planning Proposal.

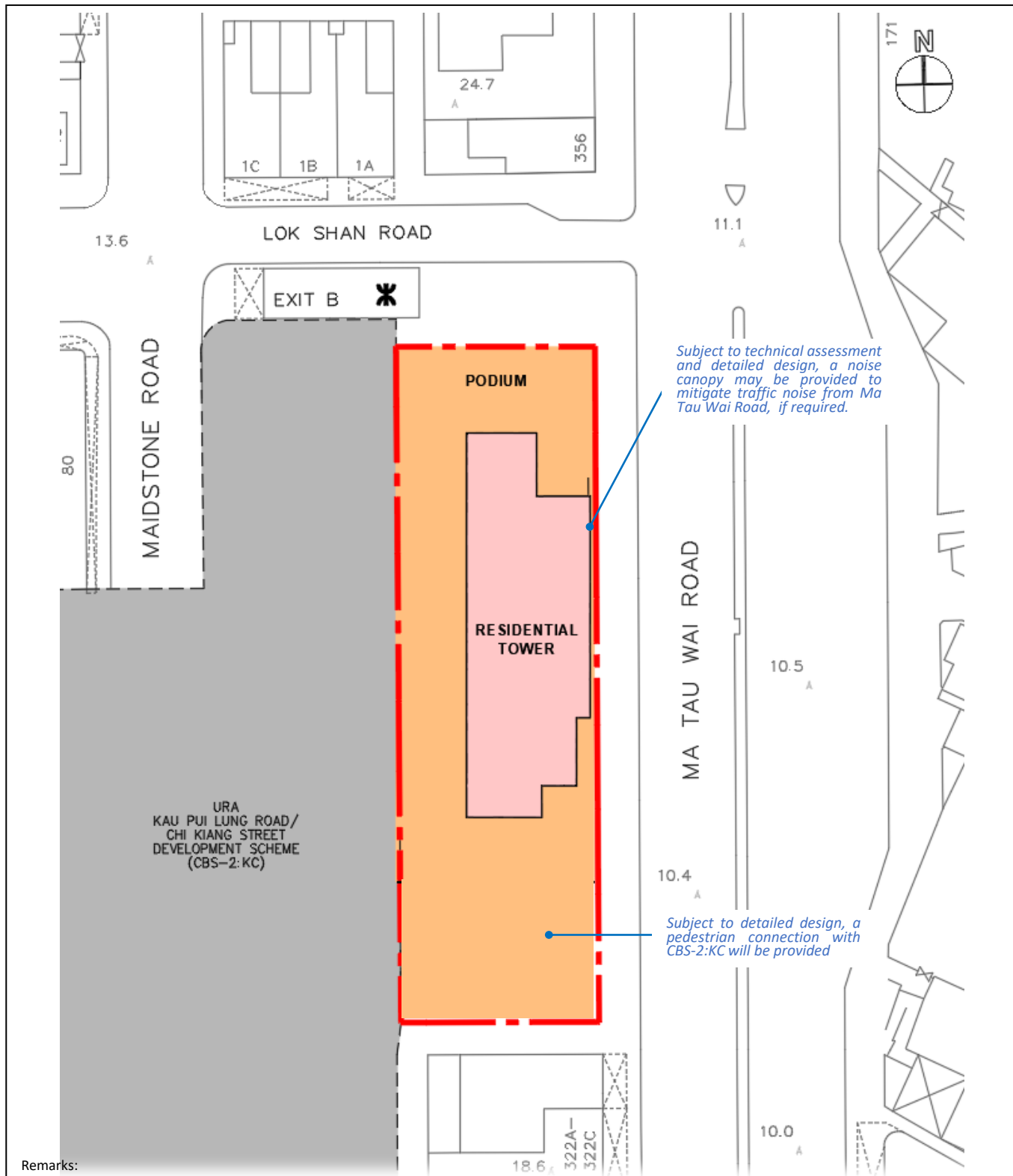
6.2 **Table 6.1** below summarizes the visual sensitivity and impact of the selected VPs.

Table 6.1 – Summary of Visual Impacts

Viewing Points	Visual Sensitivity	Resultant Overall Visual Impact
VP 1: Lok Shan Road Sitting-out Area	High	Negligible
VP 2: To Kwa Wan Market at the Junction of Kowloon City Road and Lok Shan Road	Medium	Negligible
VP 3: Footpath of Ma Tau Wai Road opposite to Kiang Su Street	Medium	Slight
VP 4: Entrance of Ko Shan Road Park	Medium	Negligible
VP 5: Kau Pui Lung Road Playground	Medium	Negligible
VP 6: Lok Man Sun Chuen at the Junction of Lok Shan Road and Kau Pui Lung Road	Medium	Negligible
VP 7: Ma Tau Wai Road / Ma Hang Chung Road Rest Garden	Medium	Slight

6.3 By comparing the views to the OZP Compliant Proposal and the Current S16 Planning Proposal from the 7 selected VPs, the subject S16 Planning Application will **have negligible to slight visual impacts** across all assessed VPs. The anticipated changes in building mass will be limited, as the total PR remains unchanged at 9.0. The proposed minor increase in building height from 120mPD to 140mPD will only result in minor magnitude of visual change, as the Current Indicative Proposal generally blends in with the adjacent CBS-2:KC with 140mPD.

6.4 In conclusion, it is anticipated that the subject S16 planning application would unlikely induce significant adverse visual impacts to the surroundings.



Remarks:
 This S16 Planning Application is a “non-scheme-based” submission. This notional design layout is solely for illustration purpose and for conducting necessary technical assessments.
 URA undertakes that the portion of the future combined development within the Application Site would not exceed maximum DPR of 8.0 and total PR of 9.0.



Application Site
Boundary



Area Zoned “R(A)”

NOTIONAL BLOCK PLAN

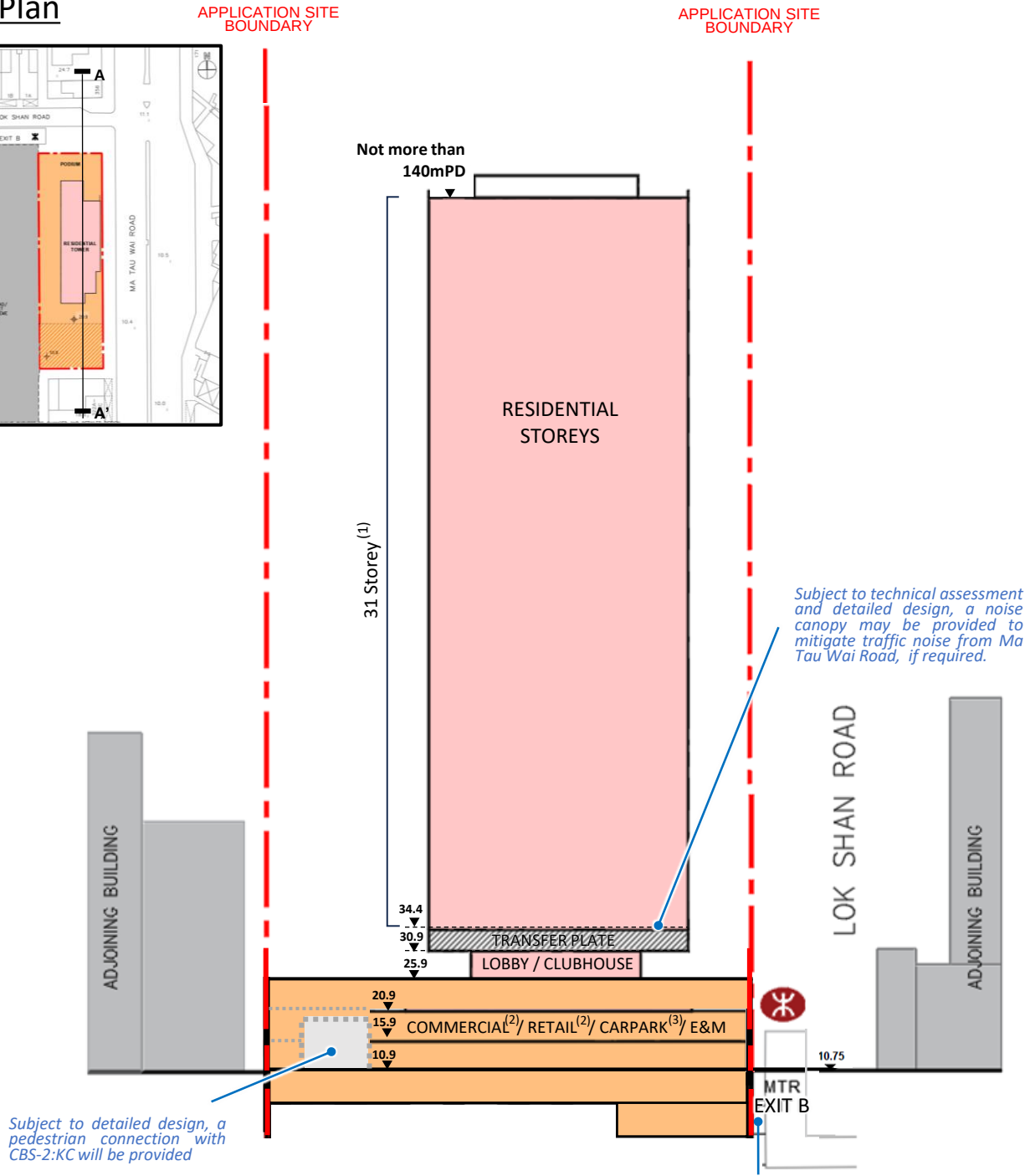
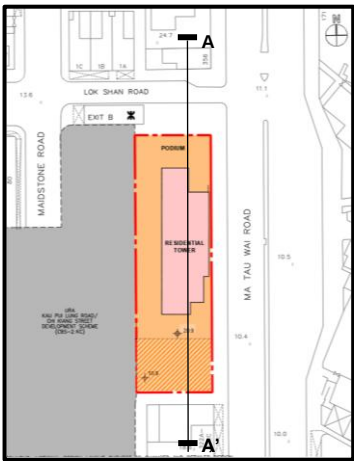
URA DEVELOPMENT PROJECT
 MA TAU WAI ROAD / LOK SHAN ROAD
 (KC-020)

VISUAL IMPACT ASSESSMENT



Figure 2.1

Key Plan



Subject to detailed design, a pedestrian connection with CBS-2:KC will be provided

Subject to technical assessment and detailed design, a noise canopy may be provided to mitigate traffic noise from Ma Tau Wai Road, if required.

Potential Connection to To Kwa Wan MTR Station (subject to details in technical and financial implications)

Remarks:

This S16 Planning Application is a “non-scheme-based” submission. This notional design layout is solely for illustration purpose and for conducting necessary technical assessments.

URA undertakes that the portion of the future combined development within the Application Site would not exceed maximum DPR of 8.0 and total PR of 9.0.

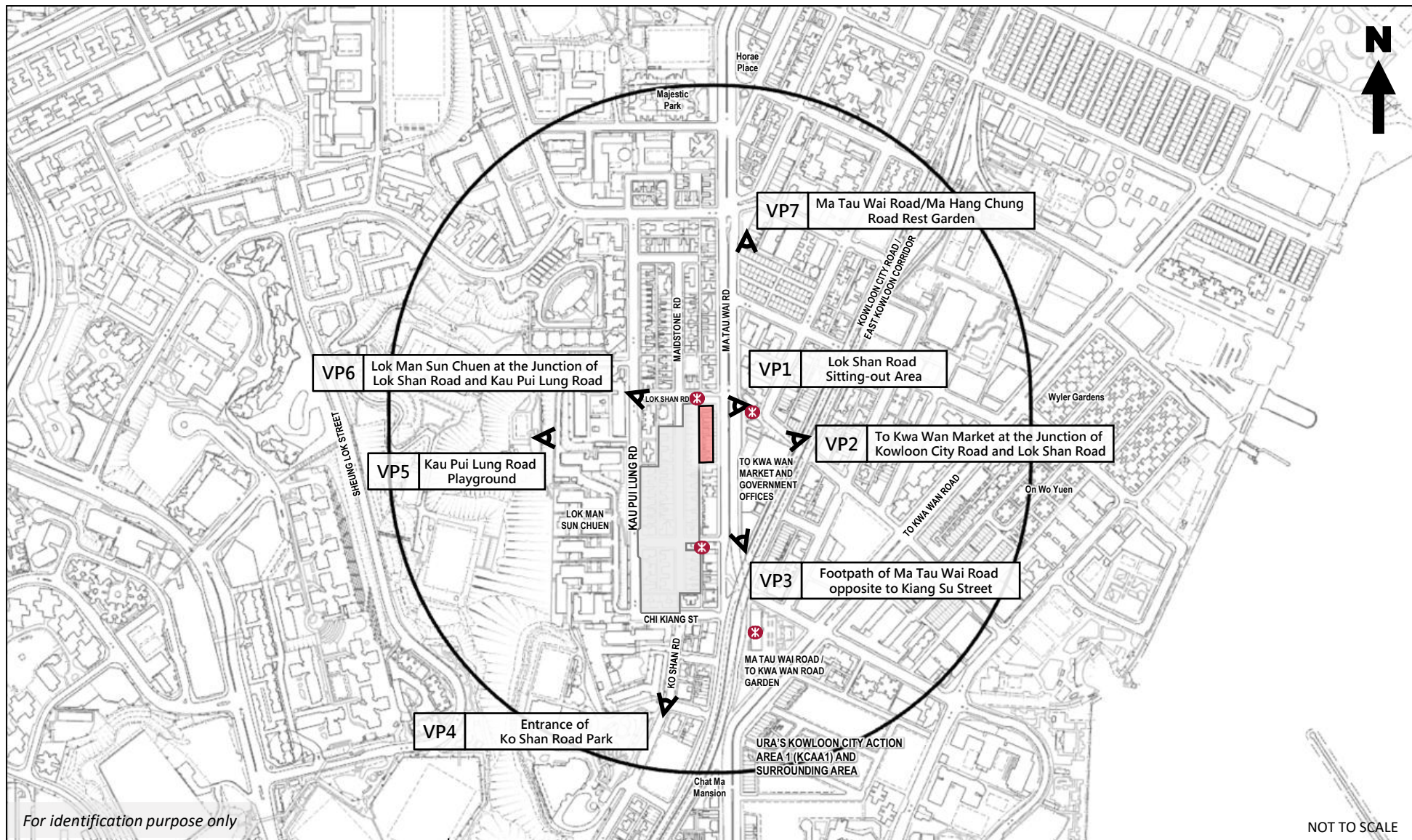
- (1) Reference to typical floor-to-floor height of 3.3m to 3.5m adopted in Hong Kong’s private residential development.
- (2) Not more than 3 storeys of commercial / retail uses will be accommodated within the basement and/or podium levels. Details will be worked out at detailed design stage.
- (3) The proposed location of the carpark may reference to the latest PNAP APP-2, which permits full GFA exemption for up to two levels of above-ground carparks. Details will be worked out at detailed design stage.

NOTIONAL SECTION PLAN

URA DEVELOPMENT PROJECT
MA TAU WAI ROAD / LOK SHAN ROAD
(KC-020)
VISUAL IMPACT ASSESSMENT



Figure 2.2



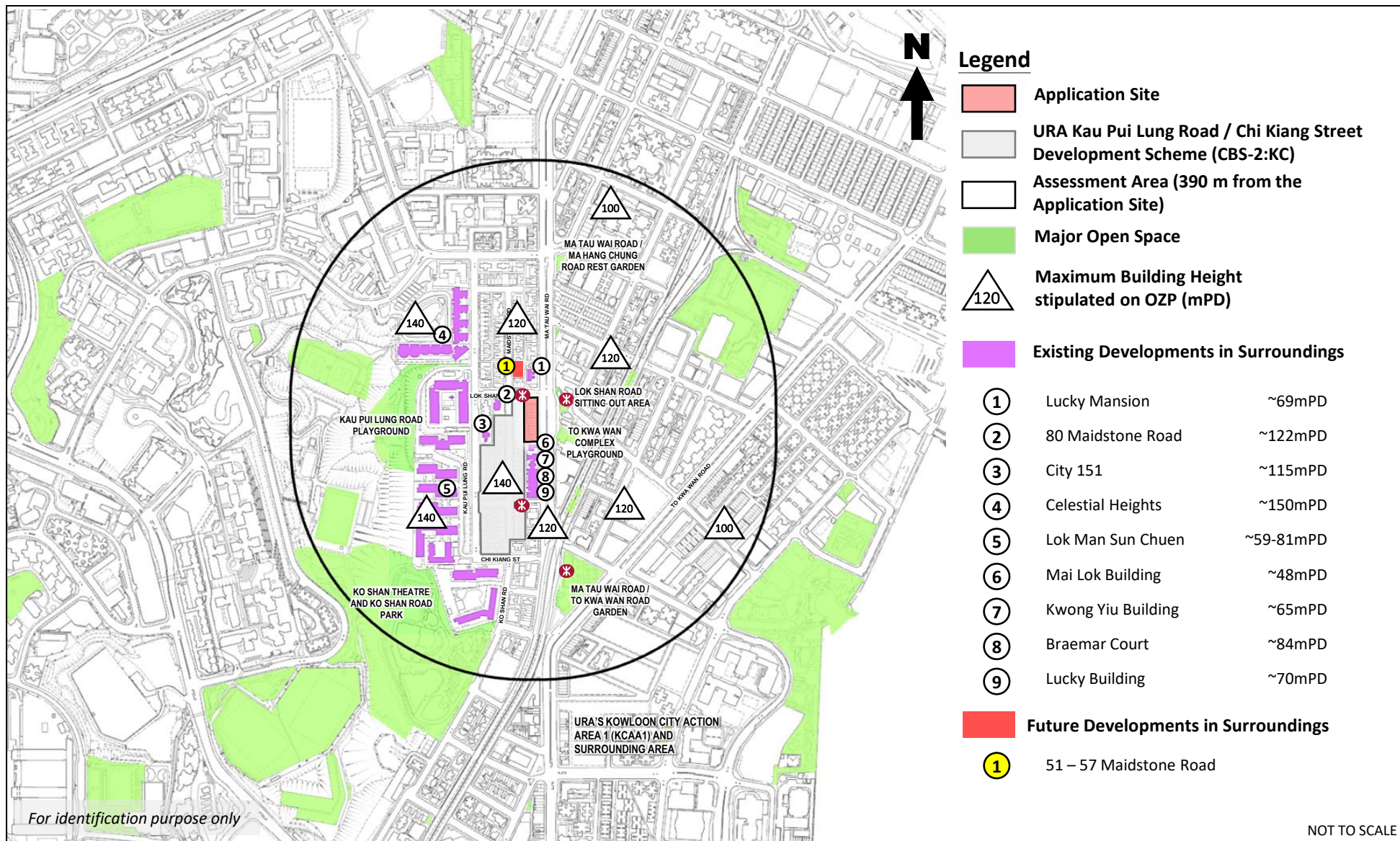
- Legend**
- Application Site
 - URA Kau Pui Lung Road / Chi Kiang Street Development Scheme (CBS-2:KC)
 - Assessment Area (390 m from the Application Site)
 - Location of Viewing Points

LOCATIONS OF VIEWING POINTS (VP1 TO VP7)

MA TAU WAI ROAD / LOK SHAN ROAD DEVELOPMENT PROJECT

(KC-020)

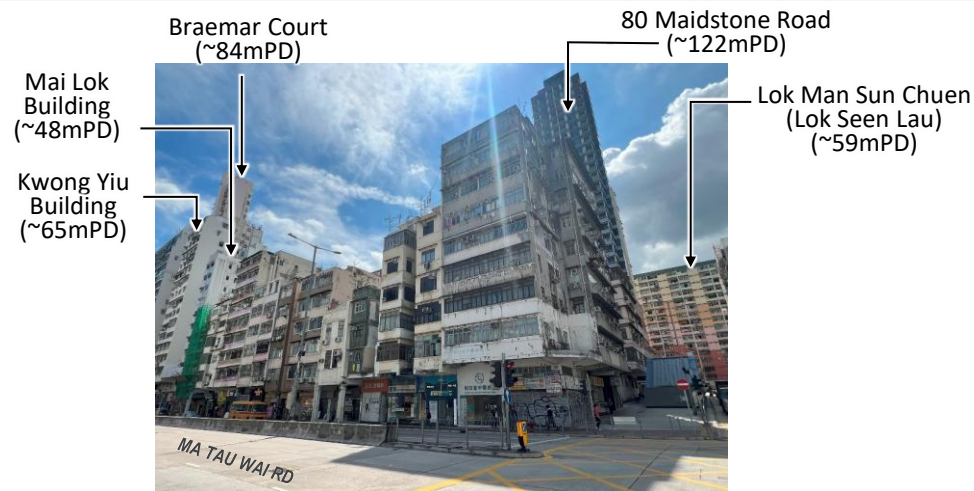
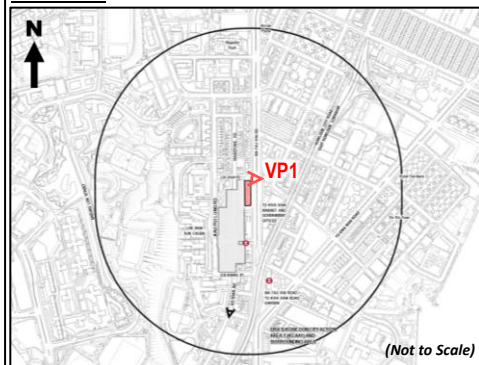
VISUAL IMPACT ASSESSMENT



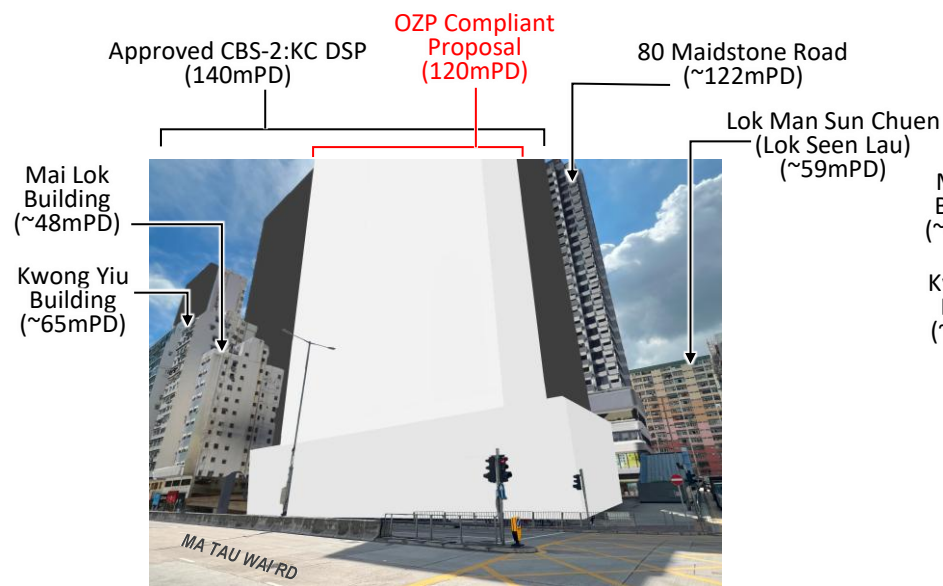
VISUAL CONTEXT AND CHARACTER

MA TAU WAI ROAD / LOK SHAN ROAD DEVELOPMENT PROJECT
(KC-020)
VISUAL IMPACT ASSESSMENT

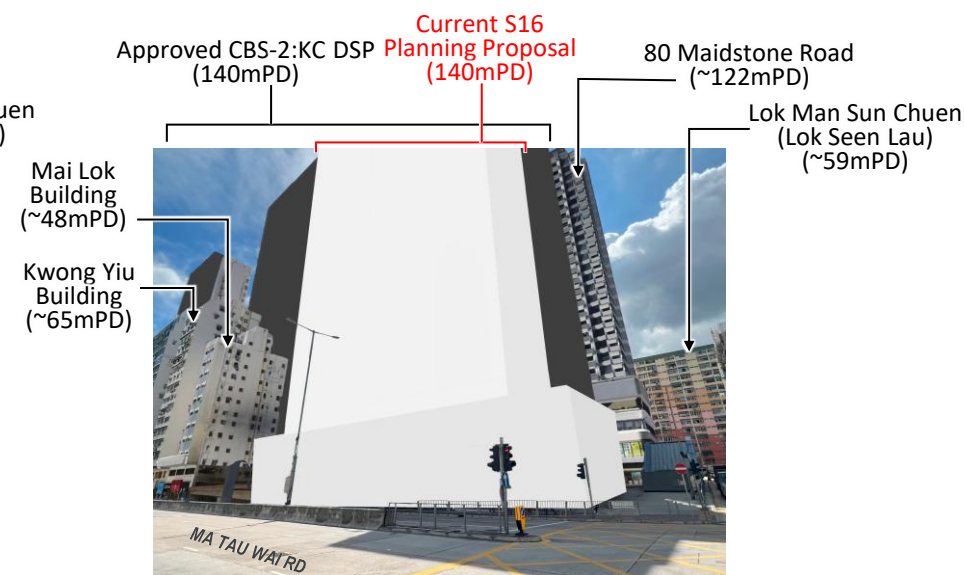
Key Plan



Existing Condition



OZP Compliant Proposal (120mPD)



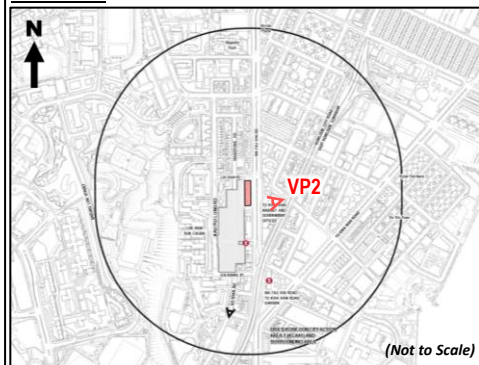
Current S16 Planning Proposal (140mPD)

PHOTOMONTAGES OF VP1 (Lok Shan Road Sitting-out Area)

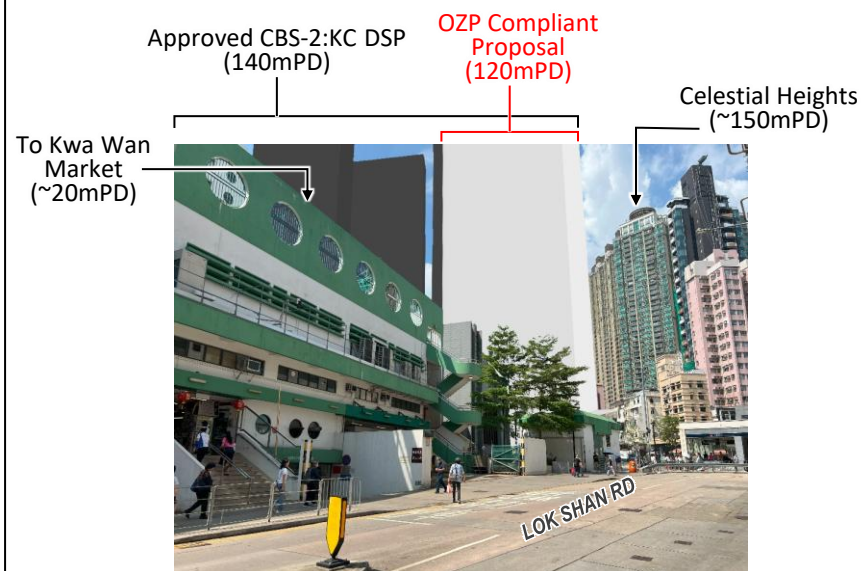
MA TAU WAI ROAD / LOK SHAN ROAD DEVELOPMENT PROJECT (KC-020)

VISUAL IMPACT ASSESSMENT

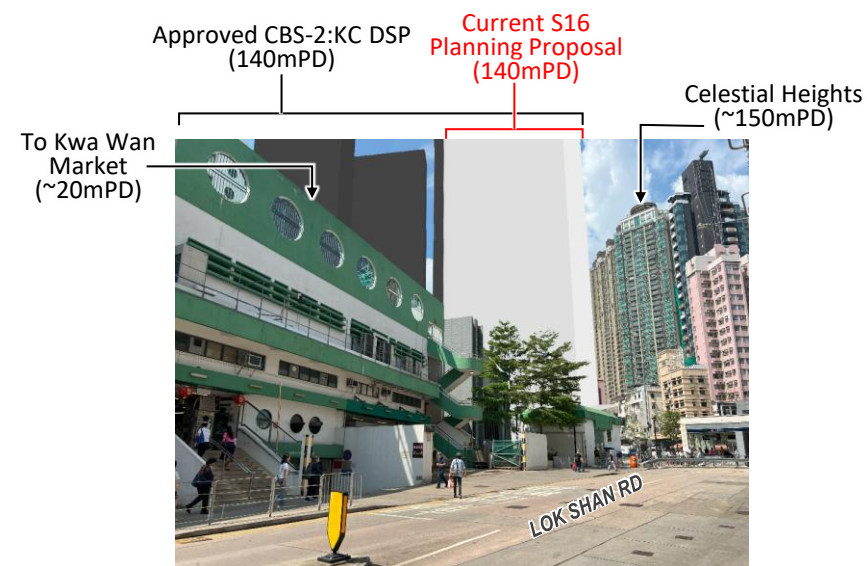
Key Plan



Existing Condition



OZP Compliant Proposal (120mPD)



Current S16 Planning Proposal (140mPD)

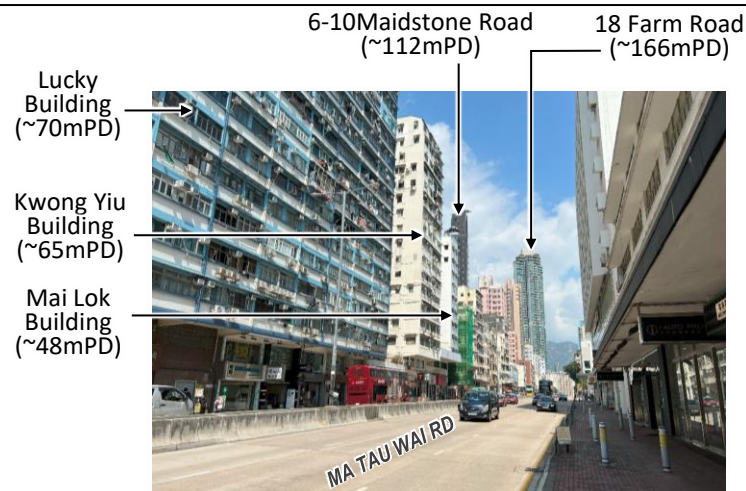
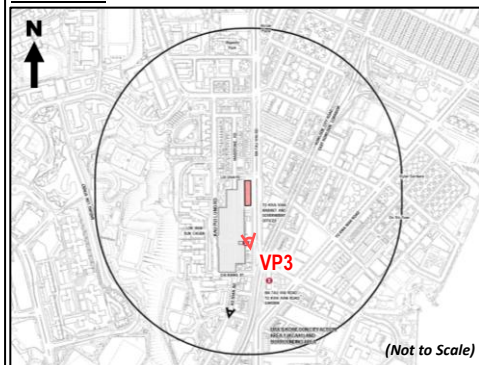
PHOTOMONTAGES OF VP2

(To Kwa Wan Market at the Junction of Kowloon City Road and Lok Shan Road)

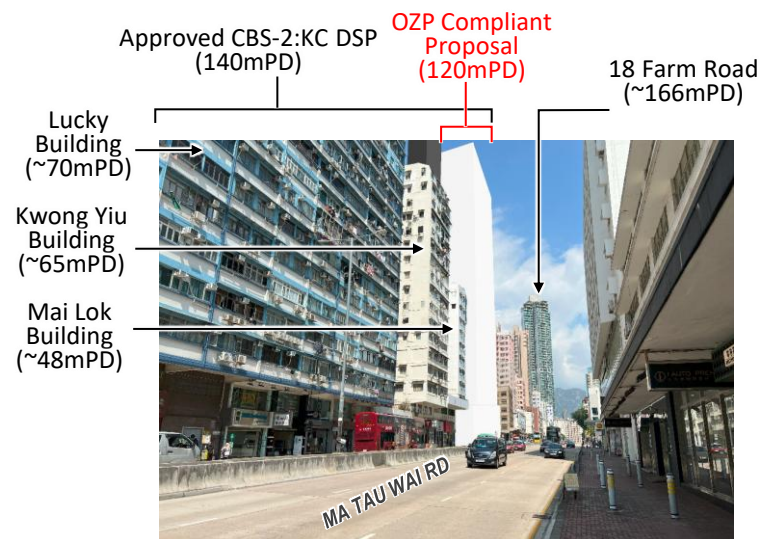
MA TAU WAI ROAD / LOK SHAN ROAD DEVELOPMENT PROJECT (KC-020)

VISUAL IMPACT ASSESSMENT

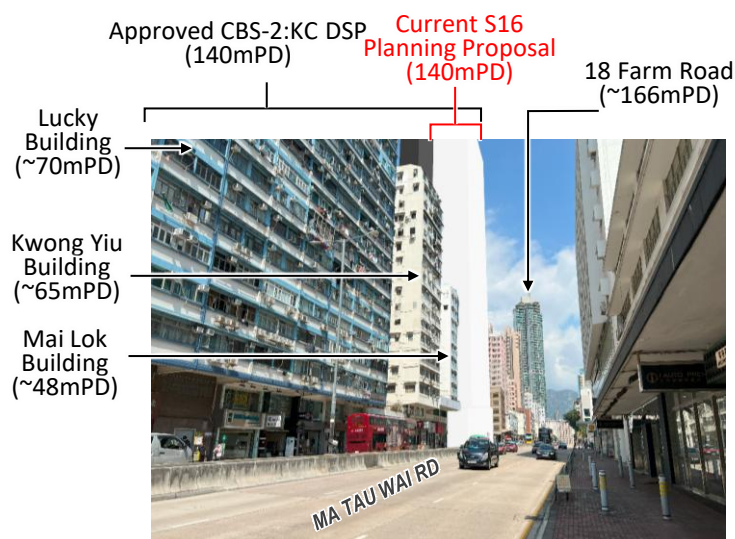
Key Plan



Existing Condition



OZP Compliant Proposal (120mPD)



Current S16 Planning Proposal (140mPD)

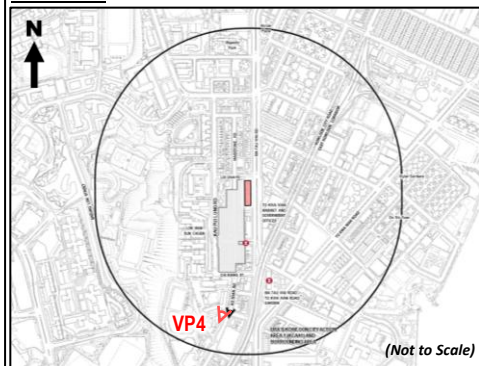
PHOTOMONTAGES OF VP3

(Footpath of Ma Tau Wai Road opposite to Kiang Su Street)

MA TAU WAI ROAD / LOK SHAN ROAD DEVELOPMENT PROJECT (KC-020)

VISUAL IMPACT ASSESSMENT

Key Plan



Hop Shing Commercial Building
(~84 mPD)

Kar Shun Building
(~82 mPD)

Loyal Mansion
(~64 mPD)

The Church of the
Good Shepherd
(~22 mPD)



Existing Condition

Approved
CBS-2:KC DSP
(140mPD)

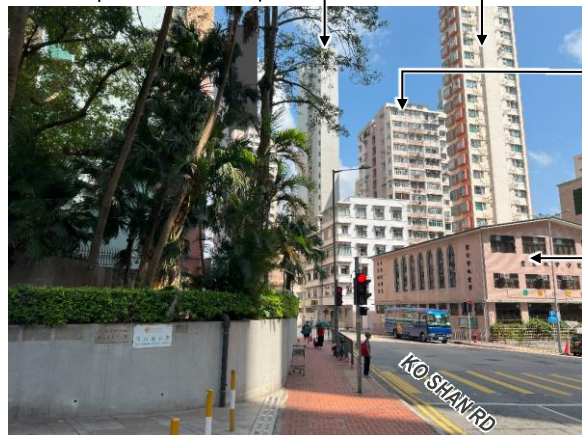
**OZP Compliant
Proposal
(120mPD)**

Hop Shing Commercial Building
(~84 mPD)

Kar Shun Building
(~82 mPD)

Loyal Mansion
(~64 mPD)

The Church of the
Good Shepherd
(~22 mPD)



OZP Compliant Proposal (120mPD)

Approved
CBS-2:KC DSP
(140mPD)

**Current S16
Planning Proposal
(140mPD)**

Hop Shing Commercial Building
(~84 mPD)

Kar Shun Building
(~82 mPD)

Loyal Mansion
(~64 mPD)

The Church of the
Good Shepherd
(~22 mPD)



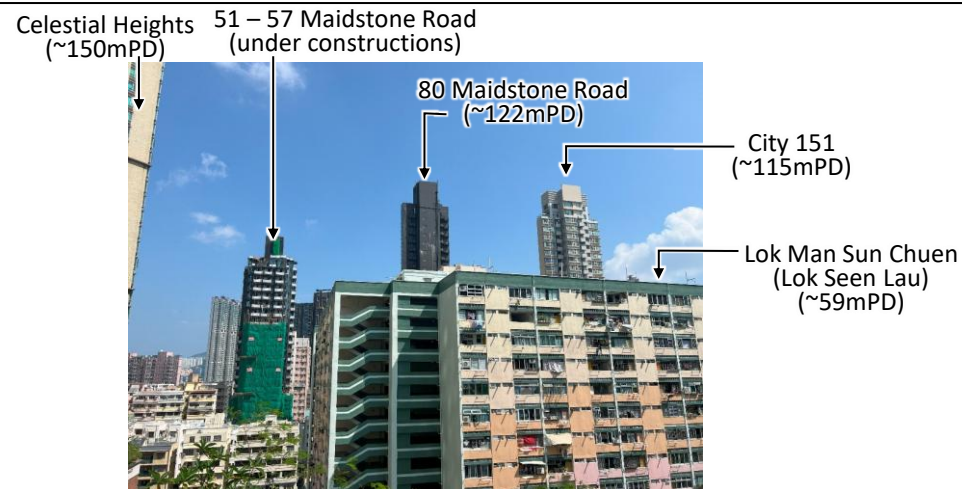
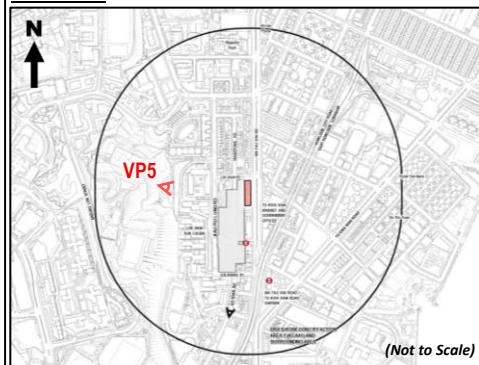
Current S16 Planning Proposal (140mPD)

PHOTOMONTAGES OF VP4 (Entrance of Ko Shan Road Park)

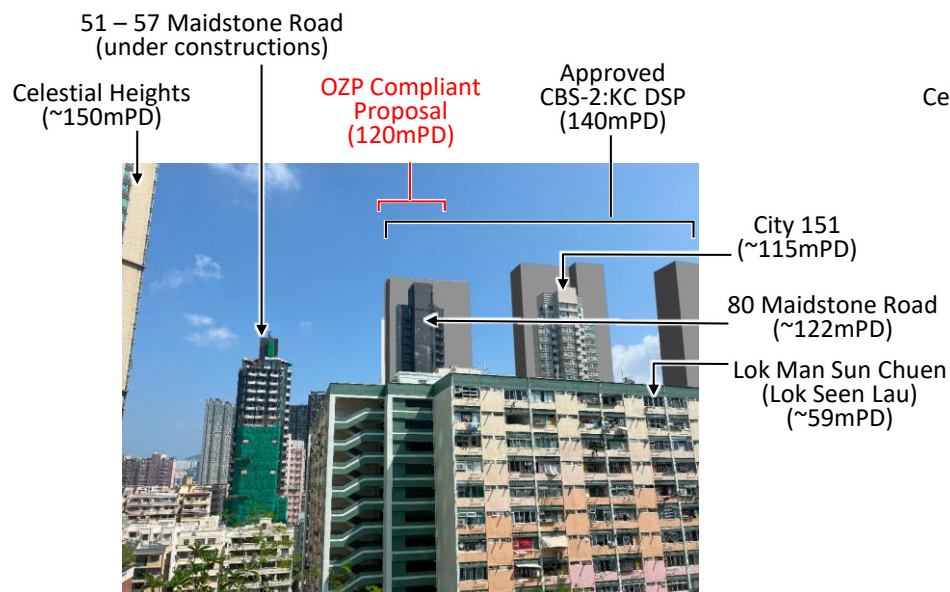
MA TAU WAI ROAD / LOK SHAN ROAD DEVELOPMENT PROJECT (KC-020)

VISUAL IMPACT ASSESSMENT

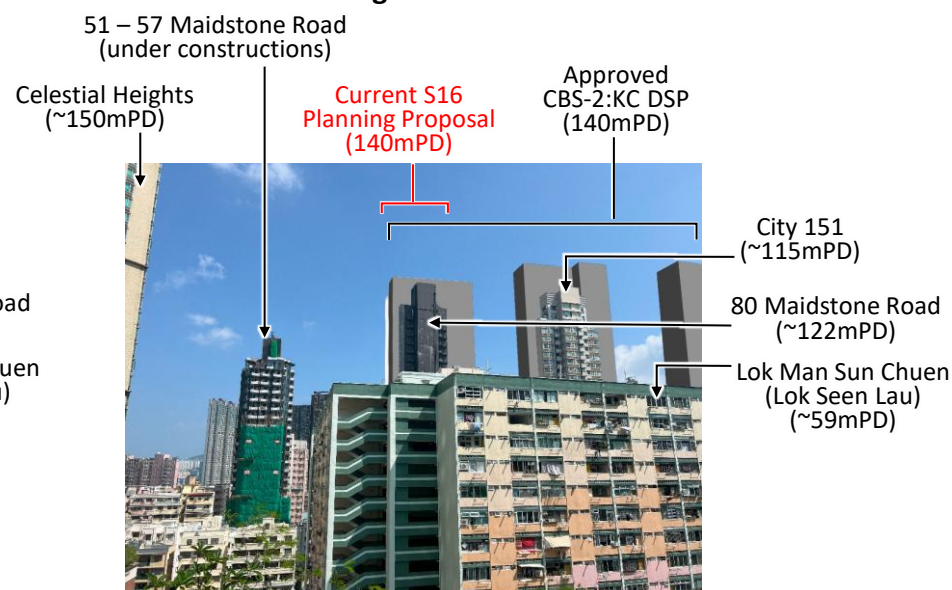
Key Plan



Existing Condition



OZP Compliant Proposal (120mPD)



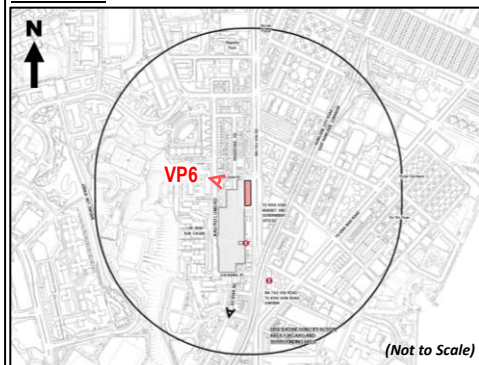
Current S16 Planning Proposal (140mPD)

PHOTOMONTAGES OF VP5 (Kau Pui Lung Road Playground)

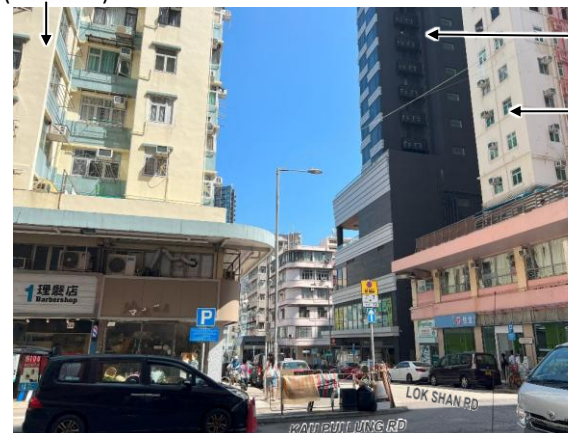
MA TAU WAI ROAD / LOK SHAN ROAD DEVELOPMENT PROJECT (KC-020)

VISUAL IMPACT ASSESSMENT

Key Plan



Fu Yu Court
(~48mPD)



80 Maidstone Road
(~122mPD)

Morning Joy Building
(~81mPD)

Existing Condition

Fu Yu Court
(~48mPD)

OZP Compliant
Proposal
(120mPD)

Approved
CBS-2:KC DSP
(140mPD)



OZP Compliant Proposal (120mPD)

80 Maidstone Road
(~122mPD)

Morning Joy Building
(~81mPD)

Fu Yu Court
(~48mPD)

Current S16
Planning Proposal
(140mPD)

Approved
CBS-2:KC DSP
(140mPD)



Current S16 Planning Proposal (140mPD)

80 Maidstone Road
(~122mPD)

Morning Joy Building
(~81mPD)

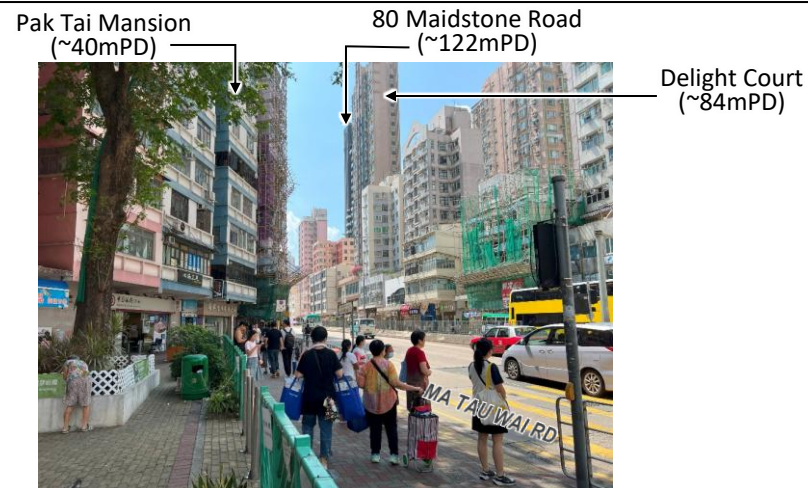
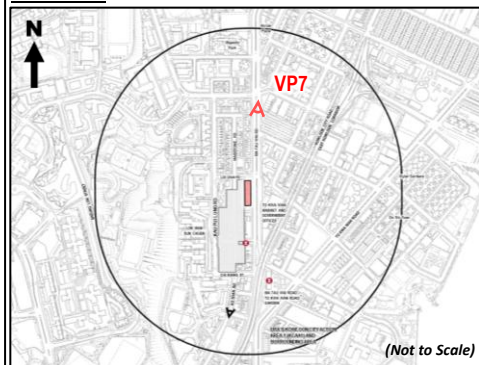
PHOTOMONTAGES OF VP6

(Lok Man Sun Chuen at the Junction of Lok Shan Road and Kau Pui Lung Road)

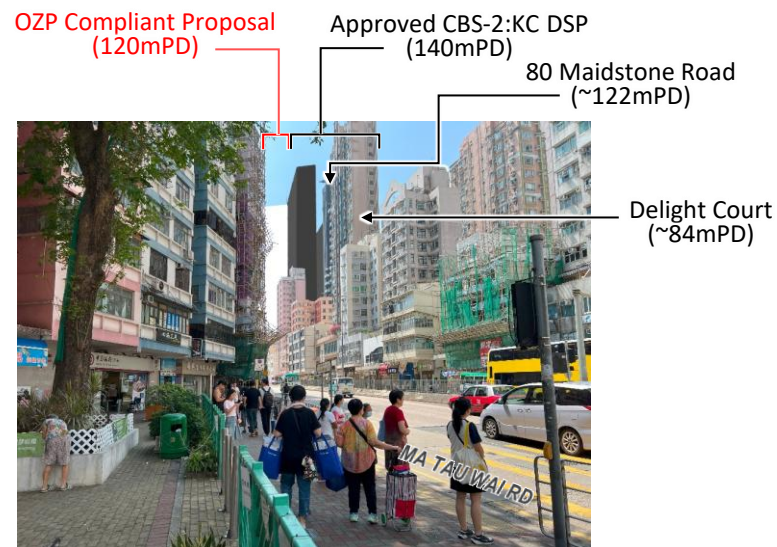
MA TAU WAI ROAD / LOK SHAN ROAD DEVELOPMENT PROJECT (KC-020)

VISUAL IMPACT ASSESSMENT

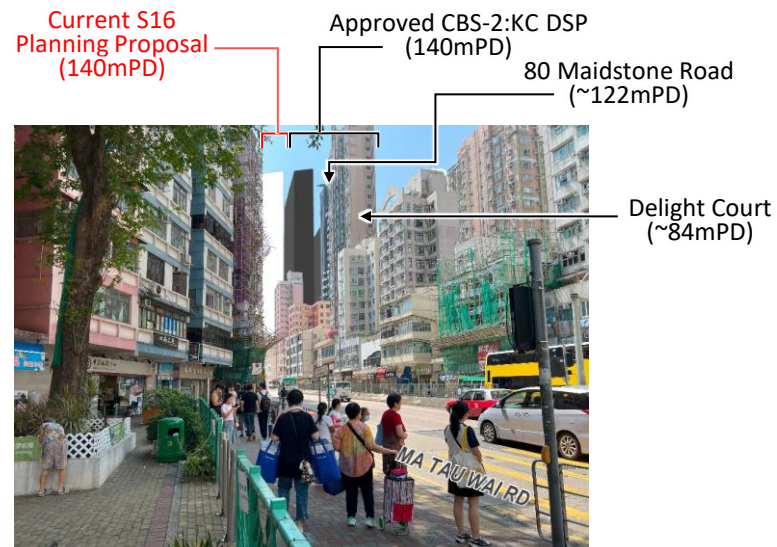
Key Plan



Existing Condition



OZP Compliant Proposal (120mPD)



Current S16 Planning Proposal (140mPD)

PHOTOMONTAGES OF VP7

(Ma Tau Wai Road / Ma Hang Chung Road Rest Garden)

MA TAU WAI ROAD / LOK SHAN ROAD DEVELOPMENT PROJECT (KC-020)

VISUAL IMPACT ASSESSMENT

Appendix 4:

Response to Public Comments

Section 16 Planning Application for Proposed Minor Relaxation of Domestic Plot Ratio and Building Height Restrictions for the Permitted Residential Development with Commercial / Retail uses of the URA Ma Tau Wai Road/ Lok Shan Road Development Project (KC-020), and Proposed Public Vehicle Park (Planning Application No. A/K10/280)

Responses to Public Comments

Para.	Summary of Public Comments	URA's Responses	Relevant to Public Comment No.
Concerns on the Non-Scheme-Based Submission Approach			
1.	The applicant explicitly states that the indicative proposal "does not form part of the application" and the notional design and indicative parameters are "solely for illustration purpose and for conducting necessary technical assessments". The design of the future development will not be bounded by the notional design" submitted.	Please note that the Application Site is zoned "R(A)" under the OZP. There is no change of the zoning of the Application Site under the subject S16 Planning Application. Under the Schedule of Use of the subject "R(A)" zone under the OZP, residential development ("Flat" use), with commercial/ retail uses on the lowest three floors, are always permitted uses as of right. The "R(A)" zone only controls the maximum domestic plot ratio (DPR), maximum total plot ratio (PR), and maximum building height restriction (BHR), while minor relaxation of such may be considered by the Town Planning Board (TPB). The control under the "R(A)" zone provides the necessary design flexibility without control on the specific form and layout of the future development, which is considered necessary to facilitate project implementation. The non-scheme-based approach under the subject S16 Planning Application which seek minor relaxation of DPR to 8.0 (total PR remain unchanged as 9.0) and BHR to 140mPD, follows the same spirit as the control provided under the subject "R(A)" zone which provides the necessary design flexibility for project implementation during detailed design stage, while ensuring the future development remains strictly bounded by the maximum permissible parameters approved by TPB. This submission approach is vital for the Urban Renewal Authority (URA) to deliver wider planning gains for the district under district-based urban renewal approach. The design flexibility allowed in the non-scheme-based approach can facilitate a more site-specific detailed design at implementation, to ensure that KC-020 can be holistically planned	1

Section 16 Planning Application for Proposed Minor Relaxation of Domestic Plot Ratio and Building Height Restrictions for the Permitted Residential Development with Commercial / Retail uses of the URA Ma Tau Wai Road/ Lok Shan Road Development Project (KC-020), and Proposed Public Vehicle Park (Planning Application No. A/K10/280)

Responses to Public Comments

Para.	Summary of Public Comments	URA's Responses	Relevant to Public Comment No.
		and implement with the adjoining URA Kau Pui Lung Road / Chi Kiang Street Development Scheme (CBS-2:KC) to optimize overall planning gains to the community. Notwithstanding the intention for a combined development, the future development will strictly comply with the maximum permissible development parameters approved by TPB under the subject S16 Planning Application, which the URA undertakes that the portion of the future combined development within the Application Site would not exceed maximum permissible DPR of 8.0 and total PR of 9.0. As the URA may implement projects via joint-venture (JV) partnerships or self-development, retaining design flexibility at the planning stage allows the future development to dynamically optimize the architectural layout during the detailed design stage to respond to site-specific constraints and market needs. While the URA, as a public body, will actively work with its JV partners to safeguard and optimize the overall urban design quality under a district-based approach.	

Section 16 Planning Application for Proposed Minor Relaxation of Domestic Plot Ratio and Building Height Restrictions for the Permitted Residential Development with Commercial / Retail uses of the URA Ma Tau Wai Road/ Lok Shan Road Development Project (KC-020), and Proposed Public Vehicle Park (Planning Application No. A/K10/280)

Responses to Public Comments

Para.	Summary of Public Comments	URA's Responses	Relevant to Public Comment No.
2.	This approach is incompatible with sound planning decision-making. The Board is asked to approve increased development intensity based on technical assessments conducted against a "hypothetical scheme" to which the applicant has no obligation to adhere. The technical studies may bear little resemblance to the actual future development.	Please be clarified that the submitted technical assessments (TAs) are not based on a 'hypothetical scheme', but are comprehensive studies conducted based on a notional design to demonstrate the technical feasibility of the maximum development parameters sought under the subject S16 application (i.e., with a maximum DPR of 8.0, total PR of 9.0 and BHR of 140mPD). The TAs could sufficiently prove that no insurmountable technical impacts will arise under the maximum permissible parameters, and their findings remain fully valid for any future development designed within the approved parameters under the subject S16 Planning Application, as detailed below: • Traffic Impact Assessment (TIA): The TIA was conducted mainly based on the estimated number of flats derived from the maximum permissible DPR and domestic GFA, providing an estimation for car parking provisions and junction capacity, any future changes to the building form will not affect the TIA results.	1
3.	This creates an "untenable situation in which the Board grants expanded development entitlements without any assurance that the impacts of the eventual built form will fall within the parameters assessed." The public is "deprived of the ability to make meaningful comment" on a scheme that "may never materialise." Ultimately, the application "seeks approval for an envelope of rights rather than a development proposal," which is not the intended purpose of the Section 16 mechanism.	• Visual Impact Assessment (VIA): The VIA assessed the proposed BHR of 140mPD, since the overall development bulk is strictly capped by a total PR of 9.0, anticipated changes in building mass is limited. Any future development designed within the maximum permissible parameters will not affect the VIA results. • Air Quality Impact Assessment (AQIA): The AQIA was conducted mainly based on a building block with BHR of 140mPD with selected representative Air Sensitive Receivers (ASRs) located along the	1

Section 16 Planning Application for Proposed Minor Relaxation of Domestic Plot Ratio and Building Height Restrictions for the Permitted Residential Development with Commercial / Retail uses of the URA Ma Tau Wai Road/ Lok Shan Road Development Project (KC-020), and Proposed Public Vehicle Park (Planning Application No. A/K10/280)

Responses to Public Comments

Para.	Summary of Public Comments	URA's Responses	Relevant to Public Comment No.
		Application Site boundary which any changes to the building block layout will not affect the AQIA results. - Noise Impact Assessment (NIA) (submitted under Environmental Assessment (EA)): The NIA was conducted base on the notional layout representing the maximum permissible development intensity (DPR of 8.0, total PR of 9.0, and BHR of 140mPD). While the final block layout remains subject to detailed design, the NIA could demonstrate that the proposed maximum parameters will not induce insurmountable noise impacts. Detailed architectural layouts and specific noise mitigation measures will be finalized during the detailed design stage, compliance of noise standard could be further monitored by the EPD and relevant departments during the subsequent Land Grant and GBP submission stages. - Waste Management Study (WMS) (submitted under the EA): The WMS estimated the construction waste mainly based on the required demolition area and Application Site area; the building form will not affect the WMS results. - Water Supply Impact Assessment (WSIA) (submitted under the EA) and Sewerage Impact Assessment (SIA) (submitted under DSIA) – These assessments are conducted mainly based on the estimated number of flats and the maximum permissible PR/GFA. Any future changes in the building form will not affect these assessment results.	

Section 16 Planning Application for Proposed Minor Relaxation of Domestic Plot Ratio and Building Height Restrictions for the Permitted Residential Development with Commercial / Retail uses of the URA Ma Tau Wai Road/ Lok Shan Road Development Project (KC-020), and Proposed Public Vehicle Park (Planning Application No. A/K10/280)

Responses to Public Comments

Para.	Summary of Public Comments	URA's Responses	Relevant to Public Comment No.
		- Drainage Impact Assessment (DIA) (submitted under the DSIA): The DIA was conducted mainly based on the future paved to unpaved area. Any future changes to the building form will not affect the DIA results. - Quantitative Risk Assessment (QRA): The QRA assessed the risk impact based on estimated population and the fixed physical distance between the Application Site and the existing LPG Compound. Future changes in the building form will not affect the QRA results. In any event, subsequent to approval of the subject S16 Planning Application, the relevant mitigation measures identified in the TAs will be implemented during detailed design/ implementation stage.	
4.	The Board is urged to consider whether it is appropriate to approve a relaxation of development restrictions in the absence of any binding commitment by planning condition or otherwise to ensure future development will not exceed the impacts assessed under the indicative scheme.	The S16 Planning Application can optimise the development potential of the site and provide wider planning gains to the community. The technical assessments has also demonstrated that the subject S16 Planning Application would not generate any adverse technical and environmental impacts. Nevertheless, subject to approval of the subject S16 Planning Application and if any approval conditions that TPB may impose, the future development will strictly adhere to the approved maximum permissible development parameters for the Application Site and any approval conditions to be incorporated by TPB.	1,2
Concerns on the Justifications for Minor Relaxation of Building Height Restriction			
5.	The primary justification for the proposed 20mPD height increase is to "align	As stated in the submission, the S16 Planning Application aims to materialize the holistic planning and implementation of the Project	1

Section 16 Planning Application for Proposed Minor Relaxation of Domestic Plot Ratio and Building Height Restrictions for the Permitted Residential Development with Commercial / Retail uses of the URA Ma Tau Wai Road/ Lok Shan Road Development Project (KC-020), and Proposed Public Vehicle Park (Planning Application No. A/K10/280)

Responses to Public Comments

Para.	Summary of Public Comments	URA's Responses	Relevant to Public Comment No.
	the height controls" of the Application Site and CBS-2:KC. This is intended to "extinguish the physical gap of 20mPD difference created by the project boundaries" and ultimately provide "greater design flexibility in building block layout and disposition under the same BHR of the two projects."	(KC-020) and the adjoining CBS-2:KC under a district-based urban renewal approach to optimize planning gains. The minor relaxation of the BHR from 120mPD to 140mPD in order to align the KC-020 and the CBS-2:KC with the same development parameters would bring substantial benefits in design flexibility for a cohesive combined development, facilitating the subsequent preparation of unified land grant(s) for the two projects and phased implementation. By aligning the BHR and DPR between the two projects, there will be no segregation by the site boundaries between two projects, therefore the building design and open space network can be more flexibly located across the two sites for better walkability and connectivity. It also allows the podia and at-grade spaces of both sites to be planned and designed holistically. For instance, integrated podium design spanning across both sites could optimize internal circulation and efficiency, and footbridges/linkages to connect the retail/commercial podia maybe included to further enhance the physical linkage across the two sites. Besides, the at-grade pedestrian avenue / event plaza and POS of CBS-2:KC could be holistically designed with KC-020 to form an integrated open space and pedestrian network linking the east and west, i.e. from the Lok Man Sun Chuen residential cluster at the western side of Kau Pui Lung Road to the POS and GIC clusters at the eastern side of Ma Tau Wai Road, via the spatial connection and podia at the future combined site of KC-020 and CBS-2:KC, and the existing pedestrian-crossing facilities at Ma Tau Wai Road.	

Section 16 Planning Application for Proposed Minor Relaxation of Domestic Plot Ratio and Building Height Restrictions for the Permitted Residential Development with Commercial / Retail uses of the URA Ma Tau Wai Road/ Lok Shan Road Development Project (KC-020), and Proposed Public Vehicle Park (Planning Application No. A/K10/280)

Responses to Public Comments

Para.	Summary of Public Comments	URA's Responses	Relevant to Public Comment No.
6.	If a unified height profile was always intended, it should have been pursued through a Development Scheme Plan amendment subject to full public participation. Therefore, using an S.16 application retrospectively to harmonise heights is problematic as it effectively overrides the original planning decisions without subjecting the change to the same level of scrutiny.	Please be clarified that a Development Scheme Plan (DSP) amendment is not relevant to the Project (KC-020). The KC-020 Project was commenced as a development project in accordance to s.26 of URAO and was authorized by SDEV without amendment in August 2025, thus the Project is governed by the permissible uses and development parameters of the subject R(A) zone under the Ma Tau Kok Outline Zoning Plan (OZP), but not a DSP. The subject S16 Planning Application to seek minor relaxation of DPR and BHR of the Project was submitted in accordance to the minor relaxation clause stated under the statutory Notes of the OZP, which allows TPB to consider minor relaxations of PR/ BH/ GFA based on individual merits to provide necessary flexibility for project implementation. As a background information, the adjoining CBS-2:KC commenced in May 2020 was one of the Pilot Projects for redevelopment of buildings under the Civil Servants' Co-operative Building Society (CBS) Scheme in response to the Government's policy mentioned in the 2018 and 2019 Policy Addresses.	1
7.	The applicant justifies the height increase by citing a potential future need for above-ground carpark; despite acknowledging they are not currently in the notional design. This amounts to seeking approval for an element that has not been	Please be clarified that while the adoption of above-ground carpark design during the detailed design stage in accordance to PNAP APP-2 will only be confirmed in detailed design stage, the proposed permissible development parameters (i.e. DPR of 8.0, total PR of 9.0, and BHR of 140mPD) under the subject S16 Planning Application, as well as the submitted TAs, have fully accounted for the potential adoption of the above-ground carpark.	1

Section 16 Planning Application for Proposed Minor Relaxation of Domestic Plot Ratio and Building Height Restrictions for the Permitted Residential Development with Commercial / Retail uses of the URA Ma Tau Wai Road/ Lok Shan Road Development Project (KC-020), and Proposed Public Vehicle Park (Planning Application No. A/K10/280)

Responses to Public Comments

Para.	Summary of Public Comments	URA's Responses	Relevant to Public Comment No.
	designed, assessed, or committed to.	Meanwhile, the proposed minor relaxation of the BHR under the subject S16 Planning Application is not solely for accommodating aboveground carparks, but also as stated in the "Planning Merits and Justification" in Section 4 of the Planning Statement that: for aligning the building height control to provide the essential design flexibility needed to materialize a holistic planning for combined development with CBS-2:KC, overcoming existing site constraints with a compact net site area and elongated configuration and to deliver key planning gains that enhance the walkability and accessibility of the area.	
Concerns on the Justifications of Commercial Marketability			
8.	Applicant's justification that the relaxation enhances the marketability and attractiveness of the project by providing flexibility to meet the market situation are purely commercial matters but not planning considerations.	Please be clarified URA's concern on 'marketability' refers to the project's overall implementability and suitability to the market needs, with timely and successful delivery of planning gains to the community through implementation of the Project. Specific to the subject S16 Planning Application, aligning the development controls of the Application Site with those of the adjoining CBS-2:KC is technically essential to materialize a holistic, "district-based" combined development across the two sites, as it enhances development flexibility, enabling a more cohesive layout that is vital to overcoming individual site constraints, optimizing pedestrian connectivity, enhancing built environment, and achieving a well-integrated urban design that benefits the wider neighborhood. Upon the subject S.16 planning approval, the Project will proceed with detailed design and subsequent GBP submissions for relevant government departments' approval, a concrete scheme layout can only be developed at the	1

Section 16 Planning Application for Proposed Minor Relaxation of Domestic Plot Ratio and Building Height Restrictions for the Permitted Residential Development with Commercial / Retail uses of the URA Ma Tau Wai Road/ Lok Shan Road Development Project (KC-020), and Proposed Public Vehicle Park (Planning Application No. A/K10/280)

Responses to Public Comments

Para.	Summary of Public Comments	URA's Responses	Relevant to Public Comment No.
		detailed design stage/ GBP submission stage for implementation.	
9.	The statutory planning system exists to serve the public interest through the orderly use of land, the protection of amenity, and the provision of community facilities. Development parameters are set based on visual impact, air ventilation, traffic, and urban design—not the financial performance of any individual project.	Please refer to responses for Pt. 8 above.	1
10.	Optimizing commercial flexibility suggests a conflation of the URA's public mandate with its commercial interests as a developer. The URA's self-financing model does not entitle it to special planning concessions. Project marketability is a matter for commercial judgment, not planning merit.	In addition to response to Pt. 8 above, the subject S16 application is to seek for minor relaxation with the planning justifications and merits as stated in the Planning Statement and is subject to the consideration and approval by the TPB. There is no special planning concessions for the URA.	1
11.	Reliance on the Financial Secretary's 2025-26 Budget Speech (suspension of commercial land sales) does not constitute site-specific planning justification. General government policy statements do not	As a public body to deliver urban renewal works, the URA aims to prudently review the market needs in delivering redevelopment projects to suit the market and the community needs. In view of the high vacancy rates and ample supply of commercial properties and demand for housing supply in recent years, the URA submitted the S16 application to seek for minor relaxation of the DPR, so as to enhance	1

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	override the need to demonstrate appropriateness for a particular site.	development flexibility for providing more flat supply to meet the market needs.	
Urban Design, Open Space & Living Standards			
12.	Wall Effect & Loss of Street Ventilation The proposed long rectangular podium with 100% site coverage creates a "wall effect" exterminating the back alley that provided street-level ventilation. There is concern the URA will eliminate basement parking to save costs under new government initiatives.	Please note that while the B(P)R permit a site coverage of up to 100% for non-domestic podiums not exceeding 15m in height, the URA will actively seek to optimize the urban design to avoid any potential "wall effect". Through a combined development of the Project with the adjoining CBS-2:KC, the Project will provide an at-grade pedestrian connection to connect with CBS-2:KC. This at-grade pedestrian connection, alongside with the appropriately designed circulation and intervening spaces, would break up the podium mass and prevents any potential wall effect, and at the same time enhance spatial and pedestrian connectivity. The potential adoption of an above-ground carpark is one of the sustainable building measures as promulgated by the Government as published in the PNAP APP-2. It aims to promote the provision of aboveground carpark in development projects by permitting GFA exemptions for up to two storeys of above-ground carpark. The feasibility of above-ground carpark will also be holistically evaluated against urban design, technical feasibility, and internal circulation efficiency to ensure an optimized layout.	2
13.	There is no internal open space provided for residents, forcing them to burden already	Given the KC-020 project has acute site layout and tiny project area of only about 1,566 sq.m., the Project is highly constrained in providing additional GFA for GIC uses solely.	2

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	overcrowded public facilities (e.g., the To Kwa Wan Station playground). Furthermore, no community services are provided.	Nevertheless, the Project will be holistically planned and implemented with the adjoining CBS-2:KC as a combined development to optimise planning gains to the community. As already committed in the CBS-2:KC, not less than 4,500 sq.m. of GIC facilities, 2,400 sq.m. of at-grade pedestrian avenue/ event plaza and 400 sq.m. of at-grade Public Open Space (POS) will be provided within the CBS-2:KC to serve the community's need. Apart from the above POS and GIC provision under the combined development, the Project will provide sufficient private open space for the Project's future residents in accordance with HKPSG requirements of 1 sq.m. per person.	
14.	Unit sizes are shrinking from 51 sq.m to 45 sq.m. URA abandoned the mandate of improving living conditions.	Please note that the average flat size of about 45 sq.m. (equivalent to about 484 sq.ft.) could meet the minimum flat size requirement of not less than 26 sq.m. in saleable area as stipulated by the Government.	2
15.	The URA is urged to stop building units under 400 sq.ft to give citizens back dignity, suggesting higher plot ratios or fewer units instead		3
16.	The development should reference designs from Taiwan or Japan to provide slightly larger balcony spaces required for practical daily chores, such as hanging laundry and drying blankets.	Specific architectural design details (e.g. balcony spaces) fall outside the scope of the current S16 Planning Application, as they will only be formulated during the detailed design / GBP submissions stages subsequent to approval of the subject S16 Planning Application. The future design will comply with relevant building ordinances and regulations to formulate a design that balance technical	3

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		feasibility, quality urban design, and the provision of highly functional, comfortable living spaces for the future residents of the community.	