此文件在 2026年 5月 29日 收到。城市規劃委員會只會在收到所有必要的資料及文件後才正式確認收到申請的日期。

This document is received on 2026 -05- 29.
The Town Planning Board will formally acknowledge the date of receipt of the application only upon receipt of all the required information and documents.

Form No. S16-I
表格第 S16-I 號

APPLICATION FOR PERMISSION UNDER SECTION 16 OF THE TOWN PLANNING ORDINANCE (CAP. 131)

根據《城市規劃條例》(第131章)第16條遞交的許可申請

Applicable to proposals not involving or not only involving:
適用於建議不涉及或不祇涉及:

(i) Construction of "New Territories Exempted House(s)";
興建「新界豁免管制屋宇」;

(ii) Temporary use/development of land and/or building not exceeding 3 years in rural areas or Regulated Areas; and
位於鄉郊地區或受規管地區土地上及/或建築物內進行為期不超過三年的臨時用途/發展;及

(iii) Renewal of permission for temporary use or development in rural areas or Regulated Areas
位於鄉郊地區或受規管地區的臨時用途或發展的許可續期

Applicant who would like to publish the notice of application in local newspapers to meet one of the Town Planning Board's requirements of taking reasonable steps to obtain consent of or give notification to the current land owner, please refer to the following link regarding publishing the notice in the designated newspapers: https://www.tpb.gov.hk/en/plan_application/apply.html

申請人如欲在本地報章刊登申請通知,以採取城市規劃委員會就取得現行土地擁有人的同意或通知現行土地擁有人所指定的其中一項合理步驟,請瀏覽以下網址有關在指定的報章刊登通知:
https://www.tpb.gov.hk/tc/plan_application/apply.html

General Note and Annotation for the Form
填寫表格的一般指引及註解

\# "Current land owner" means any person whose name is registered in the Land Registry as that of an owner of the land to which the application relates, as at 6 weeks before the application is made
「現行土地擁有人」指在提出申請前六星期,其姓名或名稱已在土地註冊處註冊為該申請所關乎的土地的擁有人的人

& Please attach documentary proof 請夾附證明文件

^ Please insert number where appropriate 請在適當地方註明編號

Please fill "NA" for inapplicable item 請在不適用的項目填寫「不適用」

Please use separate sheets if the space provided is insufficient 如所提供的空間不足,請另頁說明

Please insert a「✔」at the appropriate box 請在適當的方格內上加上「✔」號

2601279 27/5 By Hand

Form No. S16-I 表格第 S16-I 號

For Official Use Only 請勿填寫此欄	Application No. 申請編號	A/K18/1351
	Date Received 收到日期	2026-05-29

1. The completed form and supporting documents (if any) should be sent to the Secretary, Town Planning Board (the Board), 15/F, North Point Government Offices, 333 Java Road, North Point, Hong Kong.
申請人須把填妥的申請表格及其他支持申請的文件 (倘有)，送交香港北角渣華道 333 號北角政府合署 15 樓城市規劃委員會(下稱「委員會」)秘書收。

2. Please read the "Guidance Notes" carefully before you fill in this form. The document can be downloaded from the Board's website at http://www.tpb.gov.hk/. It can also be obtained from the Secretariat of the Board at 15/F, North Point Government Offices, 333 Java Road, North Point, Hong Kong (Tel: 2231 4810 or 2231 4835), and the Planning Enquiry Counters of the Planning Department (Hotline: 2231 5000) (17/F, North Point Government Offices, 333 Java Road, North Point, Hong Kong and 14/F, Sha Tin Government Offices, 1 Sheung Wo Che Road, Sha Tin, New Territories).
請先細閱《申請須知》的資料單張，然後填寫此表格。該份文件可從委員會的網頁下載 (網址：http://www.tpb.gov.hk/)，亦可向委員會秘書處 (香港北角渣華道 333 號北角政府合署 15 樓 – 電話：2231 4810 或 2231 4835)及規劃署的規劃資料查詢處(熱線：2231 5000) (香港北角渣華道 333 號北角政府合署 17 樓及新界沙田上禾輋路 1 號沙田政府合署 14 樓)索取。

3. This form can be downloaded from the Board's website, and obtained from the Secretariat of the Board and the Planning Enquiry Counters of the Planning Department. The form should be typed or completed in block letters. The processing of the application may be refused if the required information or the required copies are incomplete.
此表格可從委員會的網頁下載，亦可向委員會秘書處及規劃署的規劃資料查詢處索取。申請人須以打印方式或以正楷填寫表格。如果申請人所提交的資料或文件副本不齊全，委員會可拒絕處理有關申請。

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1. Name of Applicant 申請人姓名/名稱

(☐ Mr. 先生 / ☐ Mrs. 夫人 / ☐ Miss 小姐 / ☐ Ms. 女士 / ☐ Company 公司 / ☐ Organisation 機構)

MR. SHENG FANG & Ms. YANG JUAN

2. Name of Authorised Agent (if applicable) 獲授權代理人姓名/名稱（如適用）

(☐ Mr. 先生 / ☐ Mrs. 夫人 / ☐ Miss 小姐 / ☐ Ms. 女士 / ☑ Company 公司 / ☐ Organisation 機構)

DeSPACE (International) Limited

3. Application Site 申請地點

(a)	Full address / location / demarcation district and lot number (if applicable) 詳細地址／地點／丈量約份及地段號碼（如適用）	4 Cumberland Road, Kowloon Tong, Kowloon New Kowloon Inland Lot No. 754
(b)	Site area and/or gross floor area involved 涉及的地盤面積及／或總樓面面積	☑Site area 地盤面積 478.48 sq.m 平方米☑About 約 ☑Gross floor area 總樓面面積 287.09 sq.m 平方米☑About 約
(c)	Area of Government land included (if any) 所包括的政府土地面積（倘有）	N.A sq.m 平方米 ☐About 約

(d) Name and number of the related statutory plan(s) 有關法定圖則的名稱及編號	Approved Kowloon Tong Outline Zoning Plan No. S/K18/21
(e) Land use zone(s) involved 涉及的土地用途地帶	Residential (Group C)1
(f) Current use(s) 現時用途	Vacant (If there are any Government, institution or community facilities, please illustrate on plan and specify the use and gross floor area) (如有任何政府、機構或社區設施，請在圖則上顯示，並註明用途及總樓面面積)

4. "Current Land Owner" of Application Site 申請地點的「現行土地擁有人」

The applicant 申請人 –

☑ is the sole "current land owner"#& (please proceed to Part 6 and attach documentary proof of ownership).
是唯一的「現行土地擁有人」#& (請繼續填寫第 6 部分，並夾附業權證明文件)。

☐ is one of the "current land owners"#& (please attach documentary proof of ownership).
是其中一名「現行土地擁有人」#& (請夾附業權證明文件)。

☐ is not a "current land owner"#.
並不是「現行土地擁有人」#。

☐ The application site is entirely on Government land (please proceed to Part 6).
申請地點完全位於政府土地上（請繼續填寫第 6 部分）。

5. Statement on Owner's Consent/Notification
就土地擁有人的同意/通知土地擁有人的陳述

(a) According to the record(s) of the Land Registry as at . (DD/MM/YYYY), this application involves a total of "current land owner(s) "#.
根據土地註冊處截至 年 月 日的記錄，這宗申請共牽涉 名「現行土地擁有人」#。

(b) The applicant 申請人 –

☐ has obtained consent(s) of "current land owner(s)"#.
已取得 名「現行土地擁有人」#的同意。

Details of consent of "current land owner(s)"# obtained 取得「現行土地擁有人」#同意的詳情		
No. of 'Current Land Owner(s)' 「現行土地擁有人」數目	Lot number/address of premises as shown in the record of the Land Registry where consent(s) has/have been obtained 根據土地註冊處記錄已獲得同意的地段號碼／處所地址	Date of consent obtained (DD/MM/YYYY) 取得同意的日期 (日/月/年)

(Please use separate sheets if the space of any box above is insufficient. 如上列任何方格的空間不足，請另頁說明)

☐ has notified "current land owner(s)"#
已通知 名「現行土地擁有人」#。

Details of the "current land owner(s)" # notified 已獲通知「現行土地擁有人」#的詳細資料		
No. of 'Current Land Owner(s)' 「現行土地擁有人」數目	Lot number/address of premises as shown in the record of the Land Registry where notification(s) has/have been given 根據土地註冊處記錄已發出通知的地段號碼／處所地址	Date of notification given (DD/MM/YYYY) 通知日期(日/月/年)

(Please use separate sheets if the space of any box above is insufficient. 如上列任何方格的空間不足，請另頁說明)

☐ has taken reasonable steps to obtain consent of or give notification to owner(s):
已採取合理步驟以取得土地擁有人的同意或向該人發給通知。詳情如下：

Reasonable Steps to Obtain Consent of Owner(s) 取得土地擁有人的同意所採取的合理步驟

☐ sent request for consent to the "current land owner(s)" on _____ (DD/MM/YYYY)#&
於_____(日/月/年)向每一名「現行土地擁有人」#郵遞要求同意書&

Reasonable Steps to Give Notification to Owner(s) 向土地擁有人發出通知所採取的合理步驟

☐ published notices in local newspapers on _____ (DD/MM/YYYY)&
於_____(日/月/年)在指定報章就申請刊登一次通知&

☐ posted notice in a prominent position on or near application site/premises on _____ (DD/MM/YYYY)&
於_____(日/月/年)在申請地點／申請處所或附近的顯明位置貼出關於該申請的通知&

☐ sent notice to relevant owners' corporation(s)/owners' committee(s)/mutual aid committee(s)/management office(s) or rural committee on _____ (DD/MM/YYYY)&
於_____(日/月/年)把通知寄往相關的業主立案法團/業主委員會/互助委員會或管理處，或有關的鄉事委員會&

Others 其他

☐ others (please specify)
其他（請指明）

Note: May insert more than one「✔」.
Information should be provided on the basis of each and every lot (if applicable) and premises (if any) in respect of the application.
註: 可在多於一個方格內加上「✔」號
申請人須就申請涉及的每一地段（倘適用）及處所（倘有）分別提供資料

6. Type(s) of Application 申請類別

☐	Type (i) 第(i)類	Change of use within existing building or part thereof 更改現有建築物或其部分內的用途
☐	Type (ii) 第(ii)類	Diversion of stream / excavation of land / filling of land / filling of pond as required under Notes of Statutory Plan(s) 根據法定圖則《註釋》內所要求的河道改道／挖土／填土／填塘工程
☐	Type (iii) 第(iii)類	Public utility installation / Utility installation for private project 公用事業設施裝置/私人發展計劃的公用設施裝置
☑	Type (iv) 第(iv)類	Minor relaxation of stated development restriction(s) as provided under Notes of Statutory Plan(s) 略為放寬於法定圖則《註釋》內列明的發展限制
☑	Type (v) 第(v)類	Use / development other than (i) to (iii) above 上述的(i)至(iii)項以外的用途／發展

Note 1: May insert more than one「✓」.
註 1： 可在多於一個方格內加上「✓」號
Note 2: For Development involving columbarium use, please complete the table in the Appendix.
註 2： 如發展涉及靈灰安置所用途，請填妥於附件的表格。

(i) For Type (i) application 供第(i)類申請

(a) Total floor area involved 涉及的總樓面面積	sq.m 平方米			
(b) Proposed use(s)/development 擬議用途/發展	(If there are any Government, institution or community facilities, please illustrate on plan and specify the use and gross floor area) (如有任何政府、機構或社區設施，請在圖則上顯示，並註明用途及總樓面面積)			
(c) Number of storeys involved 涉及層數		Number of units involved 涉及單位數目		
(d) Proposed floor area 擬議樓面面積	Domestic part 住用部分	sq.m 平方米	☐About 約	
	Non-domestic part 非住用部分	sq.m 平方米	☐About 約	
	Total 總計	sq.m 平方米	☐About 約	

(e) Proposed uses of different floors (if applicable) 不同樓層的擬議用途(如適用) (Please use separate sheets if the space provided is insufficient) (如所提供的空間不足，請另頁說明)	Floor(s) 樓層	Current use(s) 現時用途	Proposed use(s) 擬議用途

(ii) For Type (ii) application 供第(ii)類申請	
(a) Operation involved 涉及工程	☐ Diversion of stream 河道改道 ☐ Filling of pond 填塘 Area of filling 填塘面積 sq.m 平方米 ☐About 約 Depth of filling 填塘深度 m 米 ☐About 約 ☐ Filling of land 填土 Area of filling 填土面積 sq.m 平方米 ☐About 約 Depth of filling 填土厚度 m 米 ☐About 約 ☐ Excavation of land 挖土 Area of excavation 挖土面積 sq.m 平方米 ☐About 約 Depth of excavation 挖土深度 m 米 ☐About 約 (Please indicate on site plan the boundary of concerned land/pond(s), and particulars of stream diversion, the extent of filling of land/pond(s) and/or excavation of land) (請用圖則顯示有關土地／池塘界線，以及河道改道、填塘、填土及／或挖土的細節及/或範圍))
(b) Intended use/development 有意進行的用途／發展	

(iii) For Type (iii) application 供第(iii)類申請	
(a) Nature and scale 性質及規模	☐ Public utility installation 公用事業設施裝置 ☐ Utility installation for private project 私人發展計劃的公用設施裝置 Please specify the type and number of utility to be provided as well as the dimensions of each building/structure, where appropriate 請註明有關裝置的性質及數量，包括每座建築物/構築物(倘有)的長度、高度和闊度

Name/type of installation 裝置名稱／種類	Number of provision 數量	Dimension of each installation /building/structure (m) (LxWxH) 每個裝置／建築物／構築物的尺寸 (米) (長 x 闊 x 高)

(Please illustrate on plan the layout of the installation 請用圖則顯示裝置的布局)

(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		to 至	
☐	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	mPD 米 (主水平基準上)	to 至	mPD 米 (主水平基準上)
		From 由	3 storeys 層	to 至	4 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

(a) Proposed use(s)/development 擬議用途/發展	Proposed Minor Relaxation of Building Height Restriction to Allow for One Storey of Basement for Carparking and Ancillary Plant Room for the Permitted House Development (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	286.83	sq.m 平方米	☑About 約
Proposed plot ratio 擬議地積比率	0.60		☑About 約
Proposed site coverage 擬議上蓋面積	30	%	☑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	4	storeys 層	
	☑ include 包括 1	storeys of basements 層地庫	
	☐ exclude 不包括	storeys of basements 層地庫	
Proposed building height of each block 每座建築物的擬議高度	25.4	mPD 米(主水平基準上)	☑About 約
		m 米	☐About 約

☑ Domestic part 住用部分

GFA 總樓面面積	286.83	sq. m 平方米	☑About 約
number of Units 單位數目	1		
average unit size 單位平均面積		sq. m 平方米	☐About 約
estimated number of residents 估計住客數目			

☐ Non-domestic part 非住用部分

GFA 總樓面面積

☐ 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)

☐ Open space 休憩用地 (please specify land area(s) 請註明地面面積)

☐ private open space 私人休憩用地	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]
1	B/F	Ancillary plant rooms, car parking
	G/F	Domestic use
	1/F	Domestic use
	2/F	Domestic use

(d) Proposed use(s) of uncovered area (if any) 露天地方（倘有）的擬議用途

Landscaping provision

7. Anticipated Completion Time of the Development Proposal 擬議發展計劃的預計完成時間

Anticipated completion time (in month and year) of the development proposal (by phase (if any)) (e.g. June 2023)
擬議發展計劃預期完成的年份及月份 (分期 (倘有)) (例：2023 年 6 月)
(Separate anticipated completion times (in month and year) should be provided for the proposed public open space and Government, institution or community facilities (if any))
(申請人須就擬議的公眾休憩用地及政府、機構或社區設施 (倘有) 提供個別擬議完成的年份及月份)

May 2027

8. Vehicular Access Arrangement of the Development Proposal 擬議發展計劃的行車通道安排

Any vehicular access to the site/subject building? 是否有車路通往地盤／有關建築物？	Yes 是	☑ There is an existing access. (please indicate the street name, where appropriate) 有一條現有車路。(請註明車路名稱(如適用)) Cumberland Road ☐ There is a proposed access. (please illustrate on plan and specify the width) 有一條擬議車路。（請在圖則顯示，並註明車路的闊度）
	No 否	☐
Any provision of parking space for the proposed use(s)? 是否有為擬議用途提供停車位？	Yes 是	☑ (Please specify type(s) and number(s) and illustrate on plan) 請註明種類及數目並於圖則上顯示) Private Car Parking Spaces 私家車車位 3 Motorcycle Parking Spaces 電單車車位 ____ 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) ____ _____ ____ _____ ____
	No 否	☐
Any provision of loading/unloading space for the proposed use(s)? 是否有為擬議用途提供上落客貨車位？	Yes 是	☑ (Please specify type(s) and number(s) and illustrate on plan) 請註明種類及數目並於圖則上顯示) 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 ____ Others (Please Specify) 其他 (請列明) ____ _____ ____ _____ ____
	No 否	☐

9. Impacts of Development Proposal 擬議發展計劃的影響

If necessary, please use separate sheets to indicate the proposed measures to minimise possible adverse impacts or give justifications/reasons for not providing such measures.
如需要的話，請另頁註明可盡量減少可能出現不良影響的措施，否則請提供理據/理由。

Does the development proposal involve alteration of existing building? 擬議發展計劃是否包括現有建築物的改動?	Yes 是	☑ Please provide details 請提供詳情 Redevelopment of existing house into a 4 storey house, including a basement for car parking and ancillary plant rooms.
	No 否	☐
Does the development proposal involve the operation on the right? 擬議發展是否涉及右列的工程? (Note: where Type (ii) application is the subject of application, please skip this section. 註：如申請涉及第(ii)類申請，請跳至下一條問題。)	Yes 是	☑ (Please indicate on site plan the boundary of concerned land/pond(s), and particulars of stream diversion, the extent of filling of land/pond(s) and/or excavation of land) (請用地盤平面圖顯示有關土地／池塘界線，以及河道改道、填塘、填土及／或挖土的細節及/或範圍) ☐ Diversion of stream 河道改道 ☐ Filling of pond 填塘 Area of filling 填塘面積 sq.m 平方米 ☐About 約 Depth of filling 填塘深度 m 米 ☐About 約 ☐ Filling of land 填土 Area of filling 填土面積 sq.m 平方米 ☐About 約 Depth of filling 填土厚度 m 米 ☐About 約 ☑ Excavation of land 挖土 Area of excavation 挖土面積 362 sq.m 平方米 ☑About 約 Depth of excavation 挖土深度 4.65 m 米 ☐About 約
	No 否	☐
Would the development proposal cause any adverse impacts? 擬議發展計劃會否造成不良影響？	On environment 對環境	Yes 會 ☐ No 不會 ☑
	On traffic 對交通	Yes 會 ☐ No 不會 ☑
	On water supply 對供水	Yes 會 ☐ No 不會 ☑
	On drainage 對排水	Yes 會 ☐ No 不會 ☑
	On slopes 對斜坡	Yes 會 ☐ No 不會 ☑
	Affected by slopes 受斜坡影響	Yes 會 ☐ No 不會 ☑
	Landscape Impact 構成景觀影響	Yes 會 ☐ No 不會 ☑
	Tree Felling 砍伐樹木	Yes 會 ☐ No 不會 ☑
	Visual Impact 構成視覺影響	Yes 會 ☐ No 不會 ☑
	Others (Please Specify) 其他 (請列明)	Yes 會 ☐ No 不會 ☐
	_____	
	_____	
	Please state measure(s) to minimise the impact(s). For tree felling, please state the number, diameter at breast height and species of the affected trees (if possible) 請註明盡量減少影響的措施。如涉及砍伐樹木，請說明受影響樹木的數目、及胸高度的樹幹直徑及品種(倘可)	

10. Justifications 理由

The applicant is invited to provide justifications in support of the application. Use separate sheets if necessary.
現請申請人提供申請理由及支持其申請的資料。如有需要，請另頁說明。

Please refer to the supplementary planning statement.

11. Declaration 聲明

I hereby declare that the particulars given in this application are correct and true to the best of my knowledge and belief.
本人謹此聲明，本人就這宗申請提交的資料，據本人所知及所信，均屬真實無誤。

I hereby grant a permission to the Board to copy all the materials submitted in this application and/or to upload such materials to the Board's website for browsing and downloading by the public free-of-charge at the Board's discretion. 本人現准許委員會酌情將本人就此申請所提交的所有資料複製及/或上載至委員會網站，供公眾免費瀏覽或下載。

Signature 簽署 ..... ☐ Applicant 申請人 / ☑ Authorised Agent 獲授權代理人

CHENG SHING TAI — Name in Block Letters 姓名（請以正楷填寫）

Senior Town Planner — Position (if applicable) 職位 （如適用）

Professional Qualification(s) 專業資格
☑ Member 會員 / ☐ Fellow of 資深會員
☐ HKIP 香港規劃師學會 / ☐ HKIA 香港建築師學會 /
☐ HKIS 香港測量師學會 / ☐ HKIE 香港工程師學會 /
☐ HKILA 香港園境師學會/ ☐ HKIUD 香港城市設計學會
☑ RPP 註冊專業規劃師 (NO. 422)
Others 其他 Chartered Member of the Royal Town Planning Institute

on behalf of 代表 DeSPACE (International) Limited

☑ Company 公司 / ☐ Organisation Name and Chop (if applicable) 機構名稱及蓋章（如適用）

Date 日期 26/05/2026 (DD/MM/YYYY 日/月/年)

Remark 備註

The materials submitted in this application and the Board's decision on the application would be disclosed to the public. Such materials would also be uploaded to the Board's website for browsing and free downloading by the public where the Board considers appropriate.
委員會會向公眾披露申請人所遞交的申請資料和委員會對申請所作的決定。在委員會認為合適的情況下，有關申請資料亦會上載至委員會網頁供公眾免費瀏覽及下載。

Warning 警告

Any person who knowingly or wilfully makes any statement or furnish any information in connection with this application, which is false in any material particular, shall be liable to an offence under the Crimes Ordinance.
任何人在明知或故意的情況下，就這宗申請提出在任何要項上是虛假的陳述或資料，即屬違反《刑事罪行條例》。

Statement on Personal Data 個人資料的聲明

1. The personal data submitted to the Board in this application will be used by the Secretary of the Board and Government departments for the following purposes:
委員會就這宗申請所收到的個人資料會交給委員會秘書及政府部門，以根據《城市規劃條例》及相關的城市規劃委員會規劃指引的規定作以下用途：
   (a) the processing of this application which includes making available the name of the applicant for public inspection when making available this application for public inspection; and
   處理這宗申請，包括公布這宗申請供公眾查閱，同時公布申請人的姓名供公眾查閱；以及
   (b) facilitating communication between the applicant and the Secretary of the Board/Government departments.
   方便申請人與委員會秘書及政府部門之間進行聯絡。

2. The personal data provided by the applicant in this application may also be disclosed to other persons for the purposes mentioned in paragraph 1 above.
申請人就這宗申請提供的個人資料，或亦會向其他人士披露，以作上述第 1 段提及的用途。

3. An applicant has a right of access and correction with respect to his/her personal data as provided under the Personal Data (Privacy) Ordinance (Cap. 486). Request for personal data access and correction should be addressed to the Secretary of the Board at 15/F, North Point Government Offices, 333 Java Road, North Point, Hong Kong.
根據《個人資料(私隱)條例》(第 486 章)的規定，申請人有權查閱及更正其個人資料。如欲查閱及更正個人資料，應向委員會秘書提出有關要求，其地址為香港北角渣華道 333 號北角政府合署 15 樓。

For Developments involving Columbarium Use, please also complete the following:
如發展涉及靈灰安置所用途，請另外填妥以下資料:

Ash interment capacity 骨灰安放容量@

Maximum number of sets of ashes that may be interred in the niches
在龕位內最多可安放骨灰的數量 _____

Maximum number of sets of ashes that may be interred other than in niches
在非龕位的範圍內最多可安放骨灰的數量 _____

Total number of niches 龕位總數 _____

Total number of single niches
單人龕位總數 _____

Number of single niches (sold and occupied)
單人龕位數目 (已售並佔用) _____

Number of single niches (sold but unoccupied)
單人龕位數目 (已售但未佔用) _____

Number of single niches (residual for sale)
單人龕位數目 (待售) _____

Total number of double niches
雙人龕位總數 _____

Number of double niches (sold and fully occupied)
雙人龕位數目 (已售並全部佔用) _____

Number of double niches (sold and partially occupied)
雙人龕位數目 (已售並部分佔用) _____

Number of double niches (sold but unoccupied)
雙人龕位數目 (已售但未佔用) _____

Number of double niches (residual for sale)
雙人龕位數目 (待售) _____

Total no. of niches other than single or double niches (please specify type)
除單人及雙人龕位外的其他龕位總數 (請列明類別)

_____

Number. of niches (sold and fully occupied)
龕位數目 (已售並全部佔用) _____

Number of niches (sold and partially occupied)
龕位數目 (已售並部分佔用) _____

Number of niches (sold but unoccupied)
龕位數目 (已售但未佔用) _____

Number of niches (residual for sale)
龕位數目 (待售) _____

Proposed operating hours 擬議營運時間 _____

_____

@ Ash interment capacity in relation to a columbarium means –
就靈灰安置所而言，骨灰安放容量指：
- the maximum number of containers of ashes that may be interred in each niche in the columbarium;
每個龕位內可安放的骨灰容器的最高數目;
- the maximum number of sets of ashes that may be interred other than in niches in any area in the columbarium; and
在該靈灰安置所並非龕位的範圍內，總共最多可安放多少份骨灰；以及
- the total number of sets of ashes that may be interred in the columbarium.
在該骨灰安置所內，總共最多可安放多少份骨灰。

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	4 Cumberland Road, Kowloon Tong, Kowloon New Kowloon Inland Lot No. 754
Site area 地盤面積	478.48 sq. m 平方米 ☑ About 約 (includes Government land of 包括政府土地 sq. m 平方米 ☐ About 約)
Plan 圖則	Approved Kowloon Tong Outline Zoning Plan No. S/K18/21
Zoning 地帶	Residential (Group C)1
Applied use/ development 申請用途/發展	Proposed Minor Relaxation of Building Height Restriction to Allow for One Storey of Basement for Carparking and Ancillary Plant Room for the Permitted House Development

		sq.m 平方米	Plot Ratio 地積比率
(i) Gross floor area and/or plot ratio 總樓面面積及／或地積比率	Domestic 住用	286.83 ☑ About 約 ☐ Not more than 不多於	0.60 ☑About 約 ☐Not more than 不多於
	Non-domestic 非住用	☐ About 約 ☐ Not more than 不多於	☐About 約 ☐Not more than 不多於

(ii) No. of blocks 幢數	Domestic 住用	1
	Non-domestic 非住用	
	Composite 綜合用途	

(iii) Building height/No. of storeys 建築物高度／層數	Domestic 住用		m 米 ☐ (Not more than 不多於)
		~25.4	mPD 米(主水平基準上) ☐ (Not more than 不多於)
		4 1	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		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)*
(iv) Site coverage 上蓋面積		30 %	☑ About 約
(v) No. of units 單位數目		1	
(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

(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 Private Car Parking Spaces 私家車車位 Motorcycle Parking Spaces 電單車車位 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) _____ _____	3 3
	Total no. of vehicle loading/unloading bays/lay-bys 上落客貨車位／停車處總數 Taxi Spaces 的士車位 Coach Spaces 旅遊巴車位 Light Goods Vehicle Spaces 輕型貨車車位 Medium Goods Vehicle Spaces 中型貨車位 Heavy Goods Vehicle Spaces 重型貨車車位 Others (Please Specify) 其他 (請列明) _____ _____	1 1

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, Lot Index Plan, Excavation Plan	☐	☐
Reports 報告書		
Planning Statement/Justifications 規劃綱領/理據	☐	☑
Environmental assessment (noise, air and/or water pollutions) 環境評估（噪音、空氣及／或水的污染）	☐	☐
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） OZP-compliant Scheme	☐	☐

Note: May insert more than one「✔」. 註：可在多於一個方格內加上「✔」號

Note: The information in the Gist of Application above is provided by the applicant for easy reference of the general public. Under no circumstances will the Town Planning Board accept any liabilities for the use of the information nor any inaccuracies or discrepancies of the information provided. In case of doubt, reference should always be made to the submission of the applicant.

註： 上述申請摘要的資料是由申請人提供以方便市民大眾參考。對於所載資料在使用上的問題及文義上的歧異，城市規劃委員會概不負責。若有任何疑問，應查閱申請人提交的文件。

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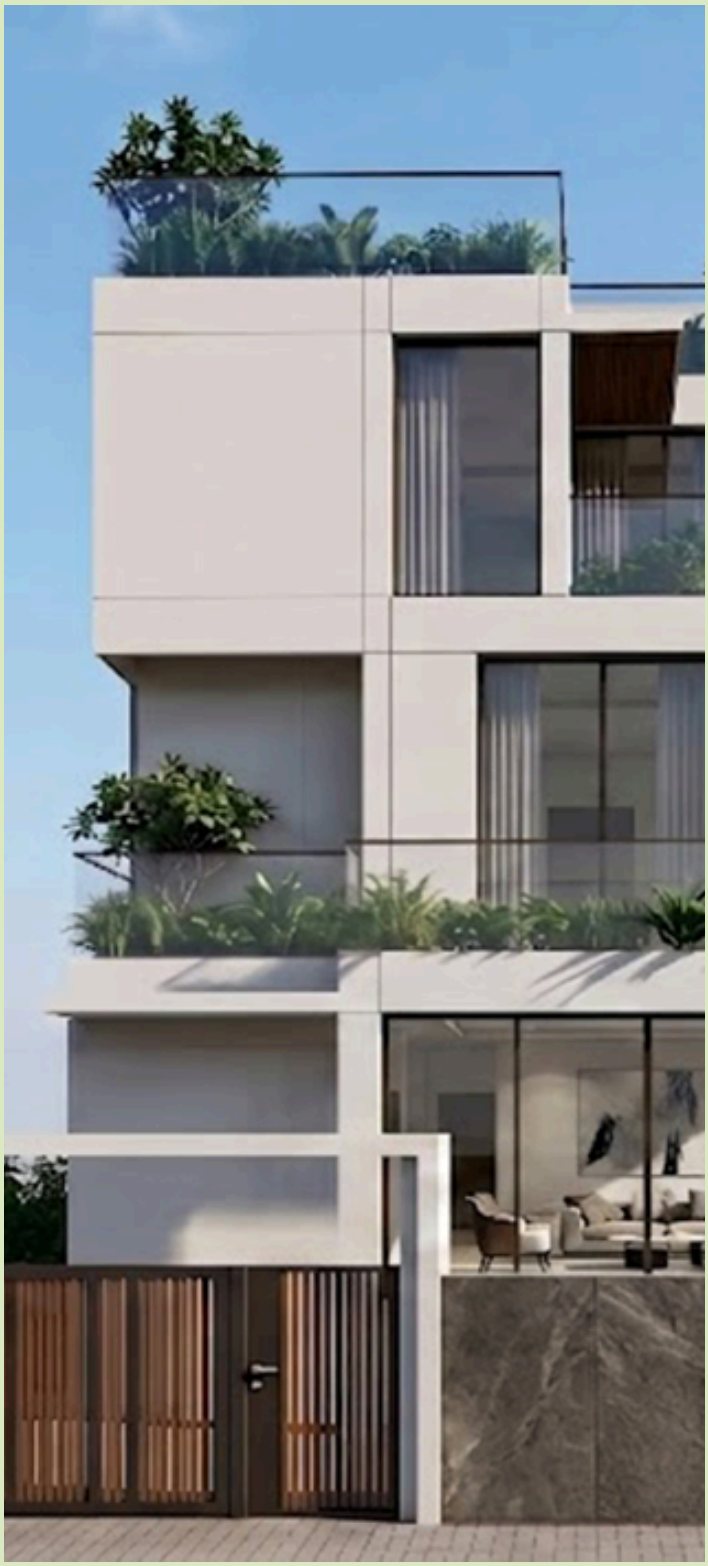
SECTION 16 TOWN PLANNING APPLICATION

SUPPLEMENTARY PLANNING STATEMENT

Proposed Minor Relaxation of Building Height Restriction to Allow for One Storey of Basement for Carparking and Ancillary Plant Room for the Permitted House Development

At New Kowloon Inland Lot No. 754,
4 Cumberland Road, Kowloon Tong, Kowloon

MAY 2026



APPLICANTS	SHENG FANG & YANG JUAN
PLANNING AND LANDS CONSULTANT	DESPACE (INTERNATIONAL) LIMITED
ARCHITECT	LOCUS ASSOCIATES LIMITED
AUTHORIZED PERSON AND STRUCTURAL ENGINEER	S.T. WONG AND PARTNERS LIMITED

EXECUTIVE SUMMARY

This Planning Statement is submitted to the Town Planning Board on behalf of the registered owners, SHENG FANG and YANG JUAN, in support of an application under Section 16 of the Town Planning Ordinance for planning permission for a minor relaxation of the building height restriction at No. 4 Cumberland Road, Kowloon Tong, Kowloon (the "Application Site").

The Application Site is zoned "Residential (Group C) 1" ("R(C)1") under the Approved Kowloon Tong Outline Zoning Plan No. S/K18/21, which is subject to a maximum plot ratio of 0.6 and a maximum building height of 3 storeys. The minor relaxation sought would allow the building height to increase from 3 storeys to 4 storeys inclusive of one basement level, facilitating the redevelopment on the Application Site as a domestic house (the "Proposed Redevelopment"). The addition of a basement level is proposed to accommodate private car parking spaces and ancillary plant rooms below ground, thereby maximising at-grade landscaping provision and achieving a compatible building form above ground.

The application is well-supported in planning terms:

- The Proposed Redevelopment is consistent with the planning intention of the "R(C)1" zone;
- The Proposed Redevelopment will not result in perceptible change to the above-ground massing or bulk, thus fully compatible with the surroundings;
- The proposed basement is of a proportionate and justified scale, accommodating only car parking and essential plant rooms that are functionally necessary for the development;
- Sufficient design merits are provided and greening opportunities are maximised for the Proposed Redevelopment, in view of the relocation of ancillary facilities to the basement level, and;
- No adverse impacts are anticipated for the Proposed Redevelopment in terms of landscape, environmental, and traffic.

In light of the foregoing, it is respectfully submitted to the Town Planning Board that planning permission should be granted.

行政摘要

本規劃綱要代表註冊業主SHENG FANG及YANG JUAN向城市規劃委員會提交，以支持根據《城市規劃條例》第16條就九龍九龍塘金巴倫道4號（「申請地盤」）申請輕微放寬建築物高度限制的規劃申請。

根據已批准的九龍塘分區計劃大綱圖第S/K18/21號，申請地盤劃作「住宅（丙類）1」（「R(C)1」）地帶，受制於最高地積比率0.6及最高建築物高度3層的限制。是次申請的輕微放寬旨在將建築物高度由3層增加至4層（包括一層地庫），以便在申請地盤上重建為一所住宅（「擬議重建項目」）。增設地庫層的目的，在於將私家車停車位及輔助機房等設施移至地下，從而騰出地面層空間以提供充足綠化，並在地面以上呈現更符合周邊環境的建築形態。

本申請在規劃上理據充分，理由如下：

- 擬議重建項目符合「住宅（丙類）1」地帶的規劃意向；
- 擬議重建項目不會對地面以上的建築體量或規模造成明顯改變，因此與周邊環境完全相容；
- 擬議地庫規模適當合理，僅用於容納發展項目在功能上所必需的車位及基本機房設施；
- 鑑於附屬設施及泊車位已遷移至地庫層，擬議重建項目提供了充足的設計增益，並盡量增加綠化機會；及
- 擬議重建項目在景觀、環境及交通方面均預計不會造成任何負面影響。

綜上所述，謹此恭請城市規劃委員會批准有關規劃申請。

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

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- IN LINE WITH THE PLANNING INTENTION OF THE “R(C)1” ZONE
- COMPATIBLE WITH THE SURROUNDING DEVELOPMENT
- APPROPRIATE DEVELOPMENT SCALE
- NO ADVERSE LANDSCAPE IMPACT
- NO ADVERSE ENVIRONMENTAL IMPACTS
- NO ADVERSE TRAFFIC IMPACT

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1. INTRODUCTION

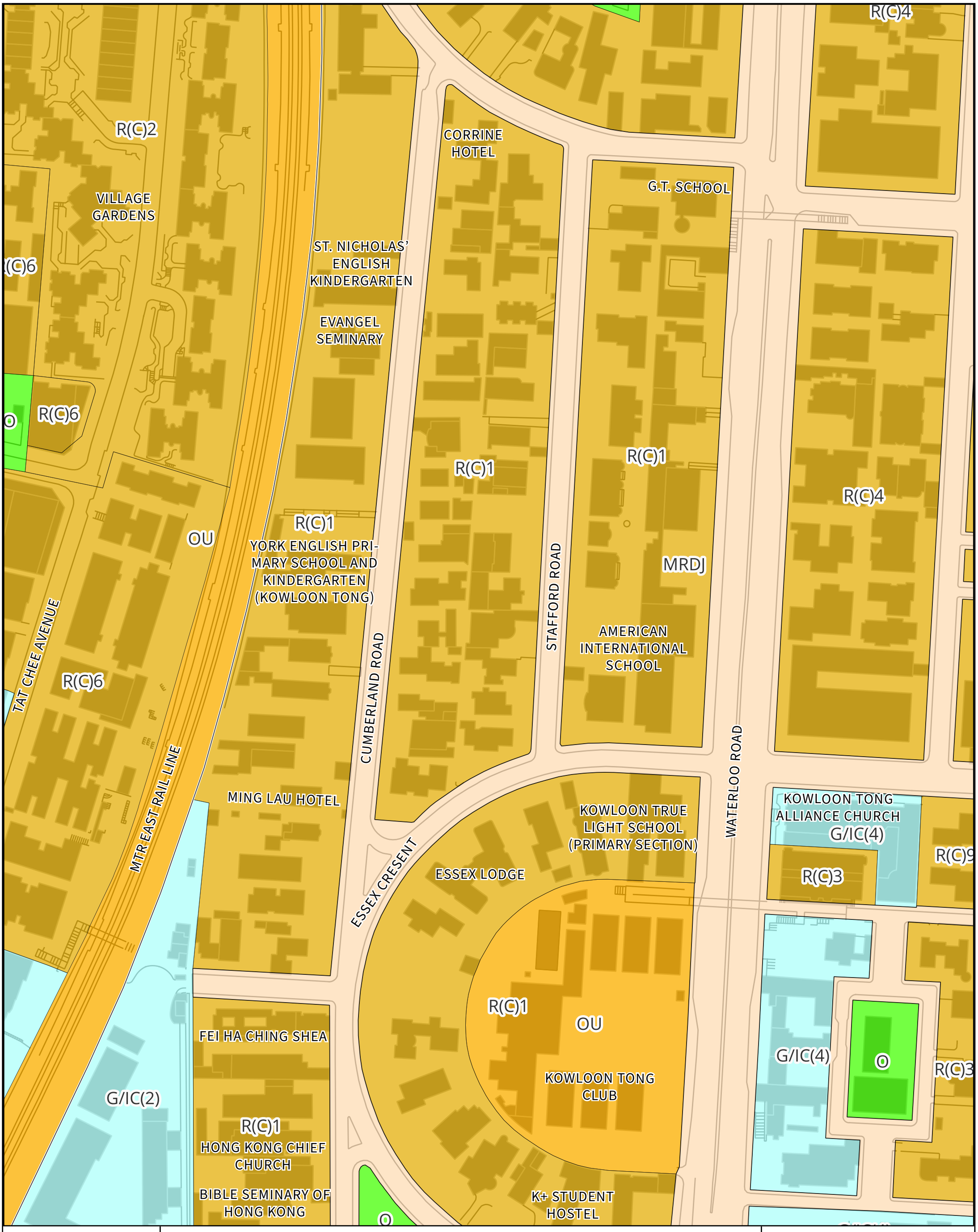
1.1 DeSPACE (International) Limited, on behalf of the registered owners, SHENG FANG and YANG JUAN, submits this Planning Statement to the Town Planning Board ("TPB") in support of an application under Section 16 of the Town Planning Ordinance for planning permission for a minor relaxation of the building height ("BH") restriction at No. 4 Cumberland Road, Kowloon Tong, Kowloon (the "Application Site"). Please refer to **Figure 1** for the Location Plan.

1.2 The Application Site is situated within the Kowloon Tong Garden Estate ("KTGE"), a prestigious low-rise, low-density residential neighbourhood. The site is currently occupied by a vacated two-storey domestic house.

1.3 According to the Approved Kowloon Tong Outline Zoning Plan ("OZP") No. S/K18/21, the Application Site is zoned "Residential (Group C) 1" ("R(C)1"), which provides for low to medium-rise, low-density residential developments subject to a maximum plot ratio ("PR") of 0.6 and a maximum BH of 3 storeys. The Notes of the OZP also illustrates that a minor relaxation of the BH restriction may be granted by the Board to allow for one basement storey for use as a car park and/or ancillary plant rooms, to be considered on individual merits having regard to the impact on existing trees and the distinctive character of the KTGE.

1.4 The application seeks permission for a minor relaxation of the BH restriction to allow for one storey of basement for car parking and ancillary plant rooms for the permitted house development, consolidating functional and building services requirements below ground so as to maximise at-grade landscaping and preserve the low-rise character of the KTGE.

1.5 The structure of this Planning Statement is as follows. Section 2 sets out the planning policy context. Section 3 reviews relevant approved precedents. Section 4 describes the Proposed Redevelopment and its design merits. Section 5 sets out the planning considerations in support of the application. Section 6 provides a conclusion.



DRAWING TITLE:
LOCATION PLAN

DRAWING NO.:
FIGURE 1

SCALE:
1:1000

LEGEND:

APPLICATION SITE

DATE:
MAY 2026

PREPARED BY:

DeSPACE (International) Limited

2. SITE CONTEXT

2.1 APPLICATION SITE AND SURROUNDING AREAS

2.1.1 The Application Site is located at 4 Cumberland Road, Kowloon Tong, comprising a site area of approximately 478.49 sq. m. (refer to **Figure 2 – Lot Index Plan**). The site is currently occupied by a house.

2.1.2 The Application Site falls within the Kowloon Tong Garden Estate ("KTGE"), a well-established low-rise, low-density residential neighbourhood of recognised character. The surrounding built environment is characterised by high-quality detached houses generally ranging from 1 to 4 storeys in height.

2.1.3 Whilst the immediate vicinity is predominantly residential in nature, the wider neighbourhood accommodates a range of compatible non-residential uses, including educational institutions, religious establishments and hotels.

2.2 LEASES

2.2.1 The Application Site forms part of New Kowloon Inland Lot No. 754 (**Figure 2** refers) and is held under a Government Lease. In common with other leases in the locality, the lot is subject to the following restrictions:

(a) the lessee shall keep and maintain on the lot a messuage or dwelling house throughout the entire term of the lease;
(b) rate and range clause;
(c) offensive trade clause; and
(d) the lessee shall not erect any additional messuage or dwelling house on the lot without the prior written consent of the Director of Lands.

2.2.2 Should the subject Section 16 application be approved, the owners will be required to apply separately to the Lands Department for a consent under lease for the Proposed Redevelopment or a lease modification to implement the proposal.

NKIL 745
約克國際幼稚園
York International Kindergarten
約克英文小學暨幼稚園（九龍塘）
York English Primary School and Kindergarten (Kowloon Tong)
NKIL 744
NKIL 743
NKIL 742
NKIL 741
文娜雅拔幼稚園
Manhabit International Kindergarten / Nursery
*NKIL 740
NKIL 739
NKIL 738
NKIL 737
*NKIL 736
836300E
NKIL 760
NKIL 759
Kingston Children
京斯敦幼兒園
NKIL 758
Kingston International Kindergarten
京斯敦國際幼稚園
NKIL 757
NKIL 756
NKIL 755 RP
NKIL 755 S.A
NKIL 754
*NKIL 752
NKIL 753
金巴倫道
雅息士道
雅悉小築
Essex Lodge
NKIL 776
NKIL 775 RP
WIP Oct 2025
NKIL 775 S.A
NKIL 774
NKIL 773
NKIL 772
NKIL 771
*NKIL 770
NKIL 769
施他佛道
NKIL 730
NKIL 729
NKIL 728

DRAWING TITLE: LOT INDEX PLAN	**LEGEND:** APPLICATION SITE; NON-BUILDING AREA (“NBA”) AS SHOWN ON THE KOWLOON TONG OUTLINE DEVELOPMENT PLAN (INDICATIVE ONLY)	**DATE:** MAY 2026
DRAWING NO.: FIGURE 2		**PREPARED BY:** DeSPACE (International) Limited
SCALE: 1:500		

2. SITE CONTEXT

2.3 ACCESSIBILITY

2.3.1 The Application Site benefits from direct vehicular access via an existing ingress/egress onto Cumberland Road, which functions as a local distributor within the KTGE road network and connects to key arterial routes including Waterloo Road. The site is well served by a range of public transport modes: Kowloon Tong MTR Station (East Rail and Kwun Tong Lines) is located within approximately 700 metres of the site, whilst bus and minibus stops on Waterloo Road and Tat Chee Avenue are accessible within 300 to 400 metres, providing convenient connectivity to the wider metropolitan area.

3. TOWN PLANNING CONTEXT

3.1 STATUTORY PLANNING CONTEXT

3.1.1 According to the Approved Kowloon Tong Outline Zoning Plan (OZP) No. S/K18/21, the Application Site is zoned "Residential (Group C) 1" ("R(C)1", **Figure 1** refers). As stipulated in the Notes of the OZP, 'House' use is under Column 1, for which a planning permission is not required. The zone is subject to a maximum plot ratio ("PR") of 0.6 and a BH of 3 storeys. Thus, a planning permission is required for minor relaxation of building height restriction for constructing a car park and ancillary plant rooms at basement level.

3.1.2 The planning intention of the "R(C)1" zone is to promote low-rise, low-density residential development, with commercial uses serving the local residential community permissible on application to TPB. In recognition of the need for design flexibility, the Notes of the OZP provide that minor relaxation of the building height restriction, specifically to accommodate one storey of basement constructed or intended for use as a car park and/or ancillary plant room, may be considered by TPB on application, having regard to the individual planning and design merits of a development or redevelopment proposal. It is further noted that any basement construction shall not cause adverse impacts to existing trees or compromise the distinctive garden estate character of the area.

3.2 NON-STATUTORY PLANNING CONTEXT

3.2.1 In addition to the statutory framework, the Application Site is subject to the guidance set out in the Draft Kowloon Tong Outline Development Plan ("ODP") No. D/K18/1A. The ODP designates a Non-Building Area ("NBA") of 6 metres in width along the site boundary abutting Cumberland Road. This setback requirement serves to enhance the local streetscape, safeguard the prevailing scale and spatial disposition of development within the KTGE, and promote air and visual permeability through the neighbourhood. Compliance with the NBA requirement is a standard material consideration for TPB in its assessment of applications for building height relaxation within the zone.

3. TOWN PLANNING CONTEXT

3.3 SIMILAR PLANNING APPROVALS

3.3.1 There is a well-established precedent of the Board granting planning permission for minor relaxation of the building height restriction to accommodate basement development within the "R(C)1" zone. A total of 4 such applications have been approved over the past 10 years, as summarised in **Table 1** below.

3.3.2 The approved applications cited were granted on the basis of demonstrated planning and design merits. Common grounds for approval included the provision of generous landscaping and greenery along street frontages, increased at-grade greening, innovative architectural design features such as stepped terraces with integrated planting, and the absence of rooftop structures. These measures collectively contributed to an enhanced streetscape and a built form sympathetic to the garden estate setting of the KTGE. The Proposed Redevelopment is therefore consistent with the planning and design rationale underlying the TPB's decisions on comparable applications, and approval of the current application would be in line with TPB's decision on similar cases.

TABLE 1 – SIMILAR APPROVED APPLICATIONS FOR MINOR RELAXATION OF BUILDING HEIGHT RESTRICTION FOR BASEMENTS WITHIN "R(C)1" ZONE ON THE OZP IN THE PAST 15 YEARS

Case No.	A/K18/350	A/K18/349	A/K18/342	A/K18/331	A/K18/326	Summary
Approval Date	05/09/2025	05/09/2025	04/03/2022	13/09/2019	03/08/2018	
Address	3 Lincoln Road	5 Lincoln Road	14 Kent Road	7 Lincoln Road	147 Waterloo Road	
Site Area	945.28 sq. m.	948.25 sq. m.	998.8 sq. m.	724.92 sq. m.	822.966 sq. m.	
Gross Floor Area (GFA)	540.35 sq. m.	540.41 sq. m.	599 sq. m.	434.95 sq. m.	564.726 sq. m.	
Floor Area for Basement	689.165 sq. m.	689.211 sq. m.	640.5 sq. m.	294 sq. m.	626.855 sq. m.	
% of Basement Floor Area over Site Area	73%	73%	64%	41%	76%	41-76%
Plot Ratio (PR)	0.6	0.6	0.6	0.6	0.6862	0.6 - 0.6862
Building Height (BH)	11.5m	11.5m	11.5m	13m	11.9m	11.5 - 13m
Site Coverage (SC)	About 24.24%	About 24.03%	About 23.7%	Not more than 75%	About 36.67%	23.7% to 75%
Car Parking	3 private car parking spaces and 1 accessible visitor car parking space in B/F	3 private car parking spaces and 1 accessible visitor car parking space in B/F	3 private car parking spaces in B/F	2 private car parking spaces in B/F and 1 visitor car parking space on G/F	2 private car parking spaces and 1 accessible visitor car parking space in B/F	2 - 4 car parking spaces
Loading/Unloading ("L/UL") Facilities	1 LGV space on G/F	1 LGV space on G/F	1 LGV space in B/F	1 temporary LGV space on G/F	1 temporary LGV space on ramp to car park on G/F	1 (temporary) LGV space
Greening Ratio	20%	20%	18.20%	15%	N/A	15 - 20%
Planning and Design Merits Considered by TPB	Building set back by 6m; stepped terraced design; overall 20% greenery at grade; no plant rooms provided on roof level		Building set back of 12.24m; decorative panel or lighting features on frontage; maximizing greenery coverage to 18.2%; preservation of existing tree	Building set back of 6m; efforts in maximising greening opportunities; inexcessive basement size	Preservation of existing tree; no plant rooms provided on ground and roof levels	Building set backs, maximising greening opportunities; preservation of existing tree; stepped terrace design; in excessive basement size; no plant rooms above ground level

4. THE PROPOSED REDEVELOPMENT

4.1 DEVELOPMENT SCHEME

4.1.1 The applicant seeks planning permission for a minor relaxation of the building height restriction from 3 storeys to 4 storeys (with additional 1 storey for 1 basement level) to facilitate the comprehensive redevelopment of the site as a single quality domestic house. The Proposed Redevelopment will comprise 3 domestic storeys above ground situated over a fully functional basement floor, resulting in a built form that remains modest in scale and sympathetic to the prevailing character of the KTGE.

4.1.2 The proposed basement level is designed to accommodate essential ancillary facilities, including 3 private car parking spaces, 1 accessible visitor car parking space, and ancillary plant rooms. By consolidating these functional elements below ground, the proposal maximises the availability of at-grade land for high-quality soft and hard landscaping, thereby contributing positively to the amenity and visual character of both the site and the wider streetscape. The key development parameters of the Proposed Redevelopment are summarized in the **Table 2** below, while the Proposed Scheme is attached in **Appendix 1** with an OZP-compliant Scheme is attached in **Appendix 2** for comparison:

4. THE PROPOSED REDEVELOPMENT

TABLE 2 – KEY DEVELOPMENT PARAMETERS

Development Parameters	OZP-compliant Scheme	Proposed Scheme	Compliancy
Site Area	About 478.48 sq. m. (or 5,150.47 sq. ft.)		N/A
Gross Floor Area ("GFA")	About 286.83 sq. m.	About 286.83 sq. m. (1)	B(P)R complied
Plot Ratio ("PR")	About 0.60	About 0.60	OZP Complied
Building Height ("BH")	About 25.4 mPD	About 25.4 mPD	JPN5 complied
No. of Storeys	3 storeys	**4 storeys (including 1 level of basement)**	Minor relaxation to be sought
Site Coverage ("SC")	About 26%	**Not more than 30%**	Within the range to cases in **Table 1**
Ratio of Basement to Site Area	N/A	**Maximum 76%**	Within the range to cases in **Table 1**
Greening Ratio	About 8.5%	**Not less than 20%**	Within the range to cases in **Table 1**
Car Parking	2 Private Car Parking Spaces (including 1 Accessible Visitor Car Parking Space)	**3 Private Car Parking Spaces (including 1 Accessible Visitor Car Parking Space)**	Within an acceptable range in relation to site area compared to cases in **Table 1**
Loading/Unloading ("L/UL") Facilities	N/A	**1 Private Car, Van-type Light Goods Vehicle ("LGV") Space**	Within an acceptable range in relation to site area compared to cases in **Table 1**

(1) According to the Practice Note for Authorised Persons, Registered Structural Engineers and Registered Geotechnical Engineers (PNAP) No. APP-2, the GFA of the proposed basement private car park, ancillary plant rooms, and access staircases can be disregarded under the Buildings Ordinance.

4. THE PROPOSED REDEVELOPMENT

4.2 PLANNING AND DESIGN MERITS

4.2.1 The proposed minor relaxation of the building height restriction is underpinned by a range of substantive planning and design merits that collectively demonstrate a positive contribution to the neighbourhood. To contextualise these merits, it is instructive to consider the Proposed Redevelopment against an OZP-compliant scheme (**Appendix 2** refers) that does not incorporate a basement. Under such a compliant scheme, ancillary facilities including water tanks and plant rooms would necessarily be relocated to the ground and roof levels, and the greenery ratio would fall below the 20% threshold typically expected by TPB. The Proposed Redevelopment, by contrast, achieves a materially superior planning and design outcome in every measurable respect, as set out below and illustrated in **Appendix 3 – Landscape Proposal**.

4.2.2 Stepped Height Design

The Proposed Redevelopment adopts a stepped height massing strategy in which the upper floors are progressively set back relative to the floors below. This articulation of building form reduces the perceived visual bulk of the development as experienced from pedestrian level along Cumberland Road, and introduces a dynamic, human-scaled profile that is more sensitive to the garden estate character of the KTGE than a uniform box-form building of equivalent floor area.

4. THE PROPOSED REDEVELOPMENT

4.2.3 Building Setback in Compliance with the Kowloon Tong ODP

A 6-metre building setback from Cumberland Road is maintained in full compliance with the non-building area requirement stipulated under the ODP This generous setback preserves the open, verdant character of the street frontage and ensures that the Proposed Redevelopment reinforces rather than erodes the defining spatial qualities of the KTGE. The setback zone is proposed to be soft-landscaped with trees and water bodies, further contributing to the green frontage as experienced from the public realm.

4. THE PROPOSED REDEVELOPMENT

4.2.4 Enhanced Greening Ratio

The Proposed Redevelopment achieves a greenery ratio of not lower than 20%, typically expected by TPB for private developments in KTGE. This is made possible precisely because of the basement, which confines the building footprint to a compact area below grade and frees up the remaining at-grade areas and rooftop for generous soft landscaping. An OZP-compliant scheme without a basement would not be capable of achieving the 20% threshold, as the building footprint at grade would occupy a proportionally greater share of the site area with the necessary provision of plant rooms. The provision of a basement therefore directly enables a higher standard of greening that would otherwise be unattainable.

4. THE PROPOSED REDEVELOPMENT

4.2.5 Relocation of Ancillary Facilities to Basement

The proposed basement accommodates all private car parking spaces and ancillary plant rooms below ground. By consolidating these facilities within the basement, the Proposed Redevelopment eliminates the visual clutter that would otherwise result from the placement of bulky plant and equipment at ground and roof level, as would be required under an OZP-compliant scheme. The outcome is a clean, unencumbered roofscape that enhances the local townscape when viewed from surrounding properties and elevated vantage points, and a building form that presents a more refined and carefully considered appearance in keeping with the residential character of the KTGE.

5. PLANNING CONSIDERATIONS

5.1 IN LINE WITH THE PLANNING INTENTION OF THE "R(C)1" ZONE

5.1.1 The Proposed Redevelopment is fully consistent with the planning intention of the "R(C)1" zone, which seeks to facilitate low-rise, low-density quality residential development within an established garden estate setting. The proposal retains a domestic house use as the principal use of the site, complies with the statutory maximum PR of 0.6, and does not exceed 3 storeys above ground. The minor relaxation sought relates solely to the accommodation of one storey of basement for car parking and ancillary plant room purposes, which is a provision expressly contemplated by the Notes of the OZP.

5.1.2 Of particular significance is the fact that TPB has previously approved a series of planning applications for minor relaxation of the building height restriction on materially identical grounds, namely to allow for one storey of basement for car parking spaces and/or ancillary plant room use within the same "R(C)1" zone of the Kowloon Tong OZP. As summarised in **Table 1** above, these approved precedents reflect a consistent recognition by TPB that such relaxations afford necessary design flexibility without increasing the domestic GFA, and that they are capable of being accommodated without prejudice to the garden estate character of the KTGE.

5.1.3 The current proposal is advanced on precisely the same planning rationale and is directly analogous to the aforementioned approved cases in all material respects. Having regard to the established decision-making pattern of TPB, it is respectfully submitted that there are no planning grounds to depart from the approach consistently taken in comparable applications, and that planning permission should similarly be granted in the present case.

5. PLANNING CONSIDERATIONS

5.2 COMPATIBLE WITH THE SURROUNDING DEVELOPMENT

5.2.1 As the proposed minor relaxation involves only the addition of a basement floor below existing ground level, it will not result in any perceptible change to the massing or bulk of the development above ground. The Proposed Redevelopment will present as a 3-storey domestic house from the public realm, which is fully in keeping with the prevailing built form of the surrounding neighbourhood, where buildings are generally 1 to 3 storeys in height.

5.2.2 Beyond the scale of the development, the compatibility of the Proposed Redevelopment with its surroundings is actively reinforced through a series of considered design measures. A 6-metre building setback from Cumberland Road is strictly observed in accordance with the NBA requirement under the Kowloon Tong ODP, preserving the open and verdant character of the street frontage that is so integral to the garden estate setting of the KTGE. The adoption of a stepped height strategy, whereby the upper floors are progressively set back relative to the floors below, further serves to reduce the perceived visual bulk of the development as experienced from pedestrian level and ensures that the building profile reads as slender and well-proportioned within its context.

5.2.3 At grade, generous soft landscaping incorporating trees, shrubs, and ground cover planting is proposed, maintaining the continuity of the mature green streetscape character that defines the KTGE. Taken together, these measures demonstrate that the Proposed Redevelopment is not merely compatible with its surroundings in a passive sense, but makes a positive and active contribution to the quality and character of the neighbourhood.

5. PLANNING CONSIDERATIONS

5.3 APPROPRIATE DEVELOPMENT SCALE

5.3.1 The scale of the proposed basement is considered reasonable and proportionate (maximum 70% of the Site Area) to the functional requirements of the Proposed Redevelopment, and is not excessive in the context of the site area. The basement footprint is directly dictated by the operational and technical requirements of the development, as elaborated below.

5.3.2 The basement accommodates 3 private car parking spaces and 1 accessible visitor car parking space in satisfaction of the parking requirements stipulated in the Hong Kong Planning Standards and Guidelines ("HKPSG"). In addition, a range of essential building services facilities are located at basement level in accordance with functional, building services, geotechnical, and structural design requirements. The consolidation of these ancillary facilities below ground is a considered design response that minimises above-ground building bulk and maximises the availability of at-grade land for landscaping, where the greening ratio exceeds the minimum requirements of 20% as stipulated in the Sustainable Building Design Guidelines.

5.3.3 The above-ground building footprint is minimised as far as practicable, and the remaining at-grade areas are devoted to generous soft landscaping. The development parameters, including PR and SC, remain within the statutory limits prescribed by the OZP Notes. The proposed basement is therefore considered to be of an appropriate and justifiable scale.

5. PLANNING CONSIDERATIONS

5.4 NO ADVERSE LANDSCAPE IMPACT

5.4.1 The Application Site is situated within an urban landscape context characterised predominantly by low-rise residential buildings. The landscape character of the area is defined by the mature greenery and generous setbacks typical of the KTGE. The Proposed Redevelopment is considered not incompatible with this landscape setting and is unlikely to induce any significant adverse visual or landscape impact.

5.4.2 Compared to the OZP-compliant Scheme, a increase of greening ratio to not less than 20% is proposed as an integral component of the Proposed Redevelopment. Landscaping, including trees, shrubs, and ground cover planting, will be provided at grade along the site boundary, as well as on the setback podiums. The Proposed Redevelopment also ensures that the provision of basement facilities does not compromise meaningful at-grade greening by allowing sufficient soil depth proposed in PNAP APP-152. These measures serve to soften the building mass, enhance the visual amenity of the development, and reinforce the green and open character of the surrounding streetscape.

5. PLANNING CONSIDERATIONS

5.5 NO ADVERSE ENVIRONMENTAL IMPACTS

5.5.1 Noise

The Application Site is not subject to any known significant noise source. Adverse noise impacts on the Proposed Redevelopment are not anticipated. Nonetheless, the planning and design of the development will comply with the relevant noise planning standards and guidelines under the HKPSG to ensure that no noise nuisance will arise.

5.5.2 Air Quality

There is no active industrial chimney or major air pollution source within 200 metres of the Application Site. The Proposed Redevelopment incorporates a basement car park, which will be designed and operated in compliance with the requirements of ProPECC PN 2/96 — Control of Air Pollution in Car Parks and other applicable guidelines. Sufficient buffer distances from vehicular emission sources as required under the HKPSG will be maintained. Adverse air quality impacts are not anticipated.

5.5.3 Sewerage and Drainage

Given the modest scale of the Proposed Redevelopment as a single domestic house, adverse sewerage or drainage impacts on the surrounding areas are not anticipated. Sewage and surface water drainage will be properly connected to the existing public drainage infrastructure and shall be handled in the General Building Plans submission stage.

5.5.4 In summary, the proposed car parking and plant room uses at basement level are demonstrated to have insignificant environmental impacts on the surrounding area. No material adverse impacts on drainage or the local environment are expected to arise from the Proposed Redevelopment.

5. PLANNING CONSIDERATIONS

5.6 NO ADVERSE TRAFFIC IMPACT

5.6.1 The Application Site currently benefits from an existing vehicular ingress/egress onto Cumberland Road, although this access arrangement is not formally stipulated in the Government Lease. The Proposed Redevelopment, by incorporating a purpose-designed basement car park with 2 private spaces and 1 accessible visitor space, will provide a formalised and well-managed parking arrangement that is expected to represent an improvement over the existing situation in terms of on-site vehicle accommodation. It should be also noted that the number of parking spaces provided in the Proposed Scheme, which is in accordance with the HKPSG, would not be possible in the OZP-compliant scheme due to a constrained site area.

5.6.2 Due to site constraints, the provision of 1 L/UL space for private cars, van-type LGVs is the only viable option in the Proposed Scheme. The Applicant would ensure that all L/UL activities for the Proposed Redevelopment will only take place within the Site, and that no larger LGVs can conduct L/UL activities within the Site or obstruct the public footpath and carriageway on Cumberland Road.

5.6.3 The Proposed Redevelopment constitutes a single-family domestic house, and trip generation associated with the development will therefore remain minimal. No adverse impact on the capacity or operation of the surrounding road network is anticipated. Therefore, the proposed minor relaxation of building height is not expected to give rise to any adverse traffic impact on the surrounding road network.

6. CONCLUSION

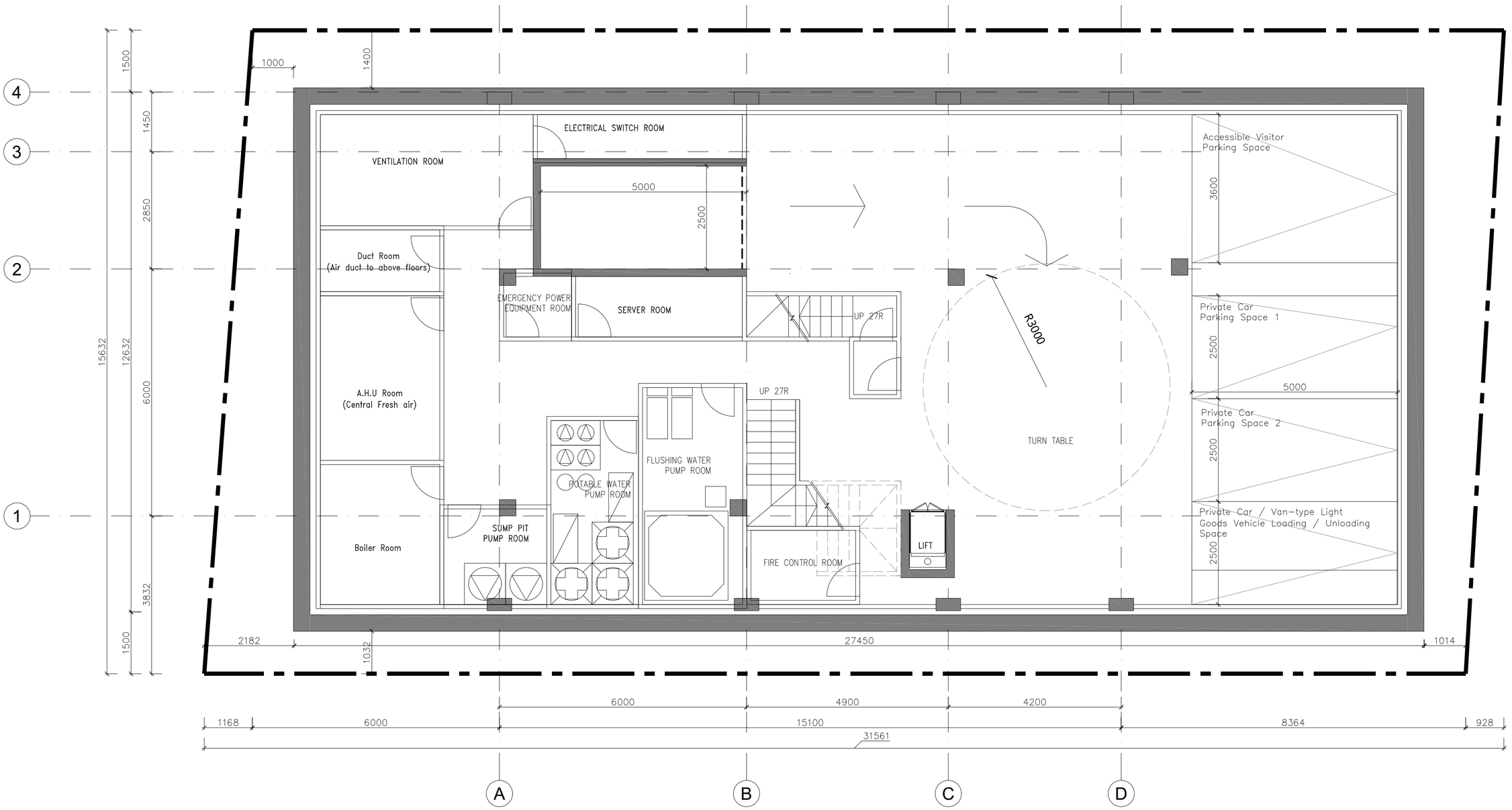
6.1 This application seeks a minor relaxation of the building height restriction from 3 storeys to 4 storeys (inclusive of one basement level) to facilitate the comprehensive redevelopment of the Application Site as a single quality domestic house at 4 Cumberland Road, Kowloon Tong.

6.2 The Proposed Redevelopment is fully justified on the following grounds:

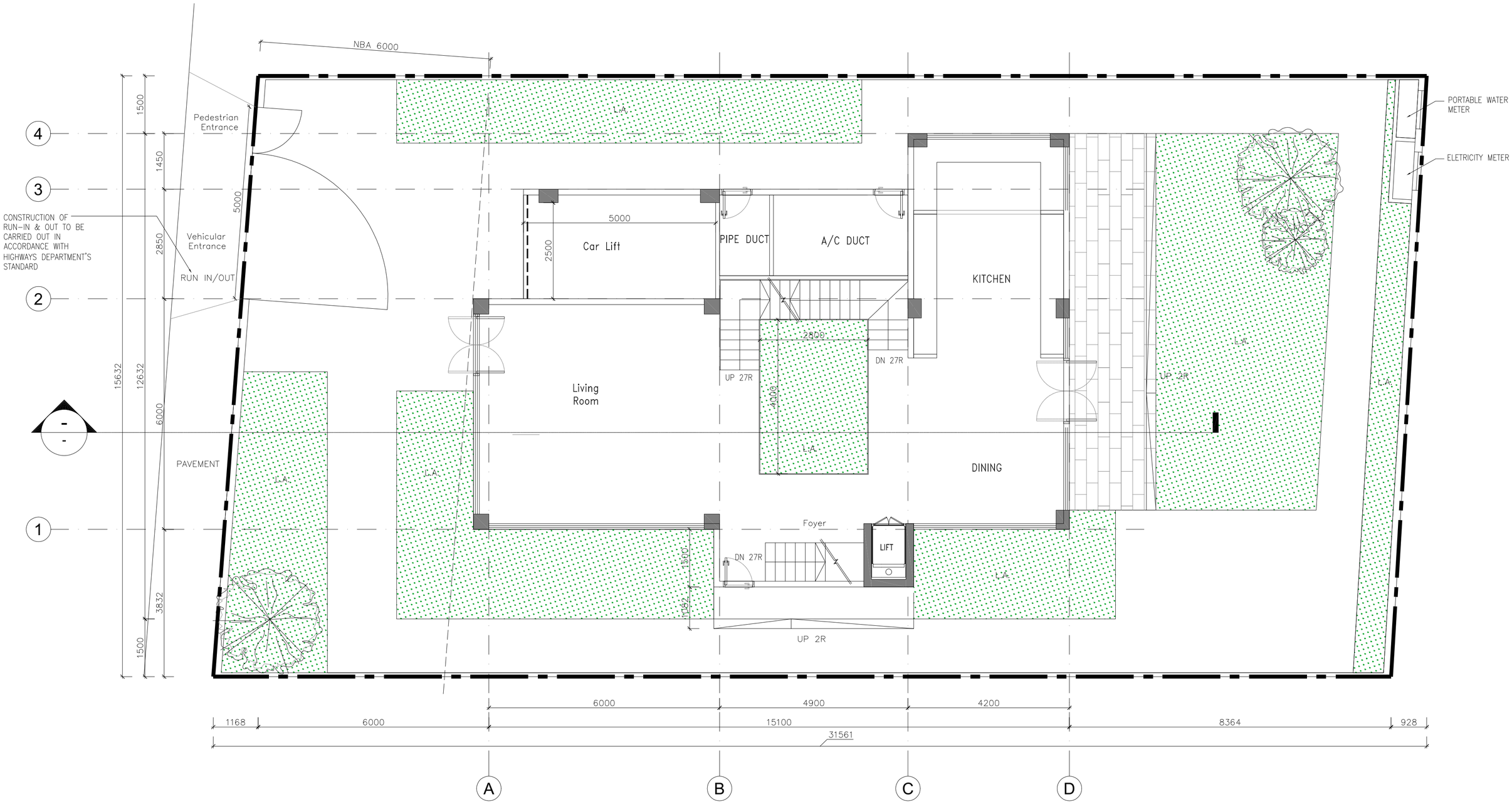
a) The Proposed Redevelopment is consistent with the planning intention of the "R(C)1" zone;
b) The Proposed Redevelopment will not result in perceptible change to the above-ground massing or bulk, thus fully compatible with the surroundings;
c) The proposed basement is of a proportionate and justified scale, accommodating only car parking and essential plant rooms that are functionally necessary for the development;
d) Sufficient design merits are provided and greening opportunities are maximised for the Proposed Redevelopment, in view of the relocation of ancillary facilities to the basement level, and;
e) No adverse impacts are anticipated for the Proposed Redevelopment in terms of landscape, environmental, and traffic.

6.3 In light of the foregoing, it is respectfully submitted that the application is well-founded in planning terms and that planning permission should be granted by TPB accordingly.

APPENDIX 1
PROPOSED SCHEME



BASEMENT FLOOR



GROUND FLOOR

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UP 24R
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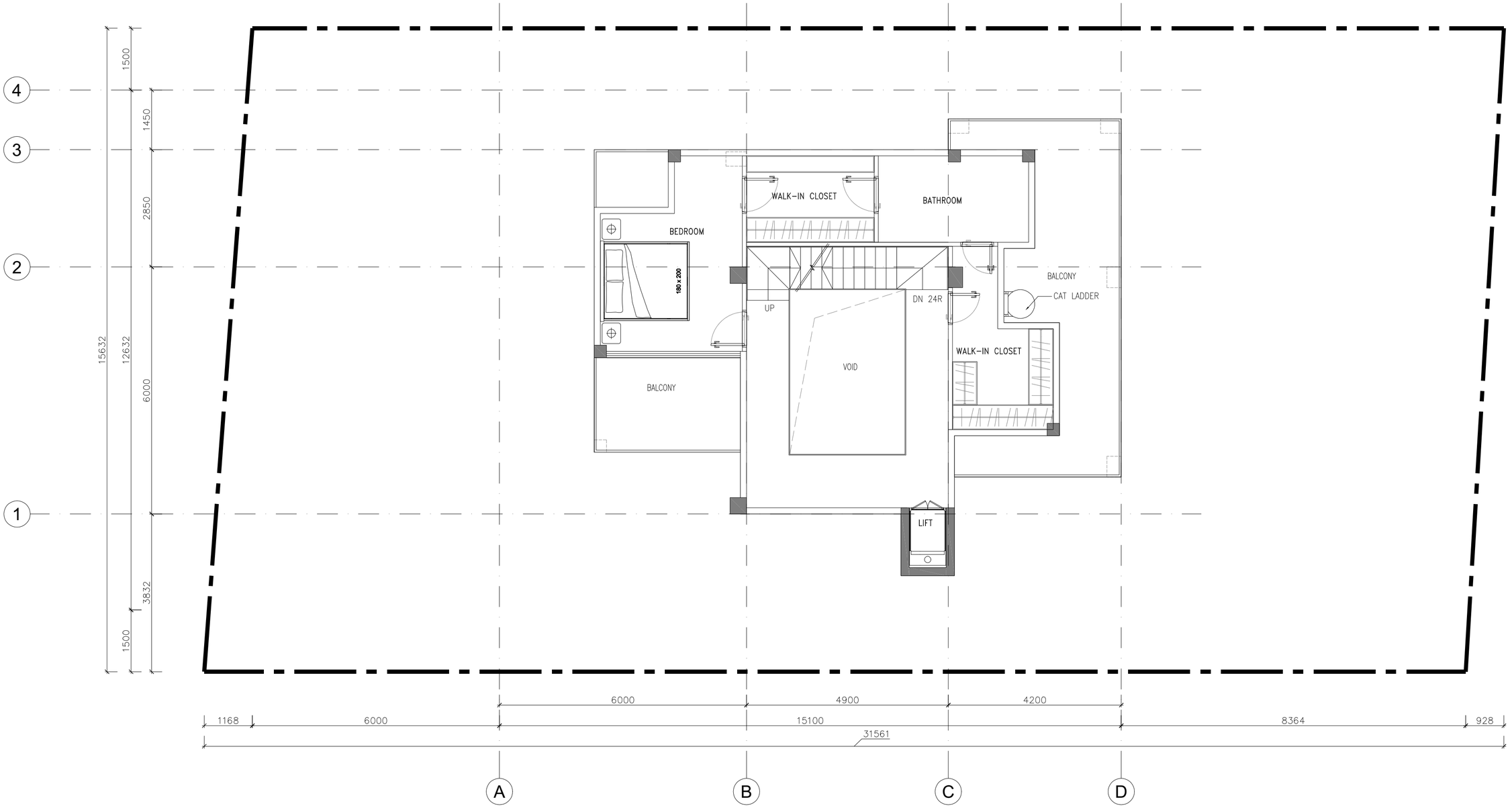
LIFT
BALCONY

FIRST FLOOR



SECOND FLOOR

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3832
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1100mm A.F.F.L. Parapet Wall
ROOF
1100mm A.F.F.L. Parapet Wall
CAT LADDER
VOID
LIFT
OVERRUN
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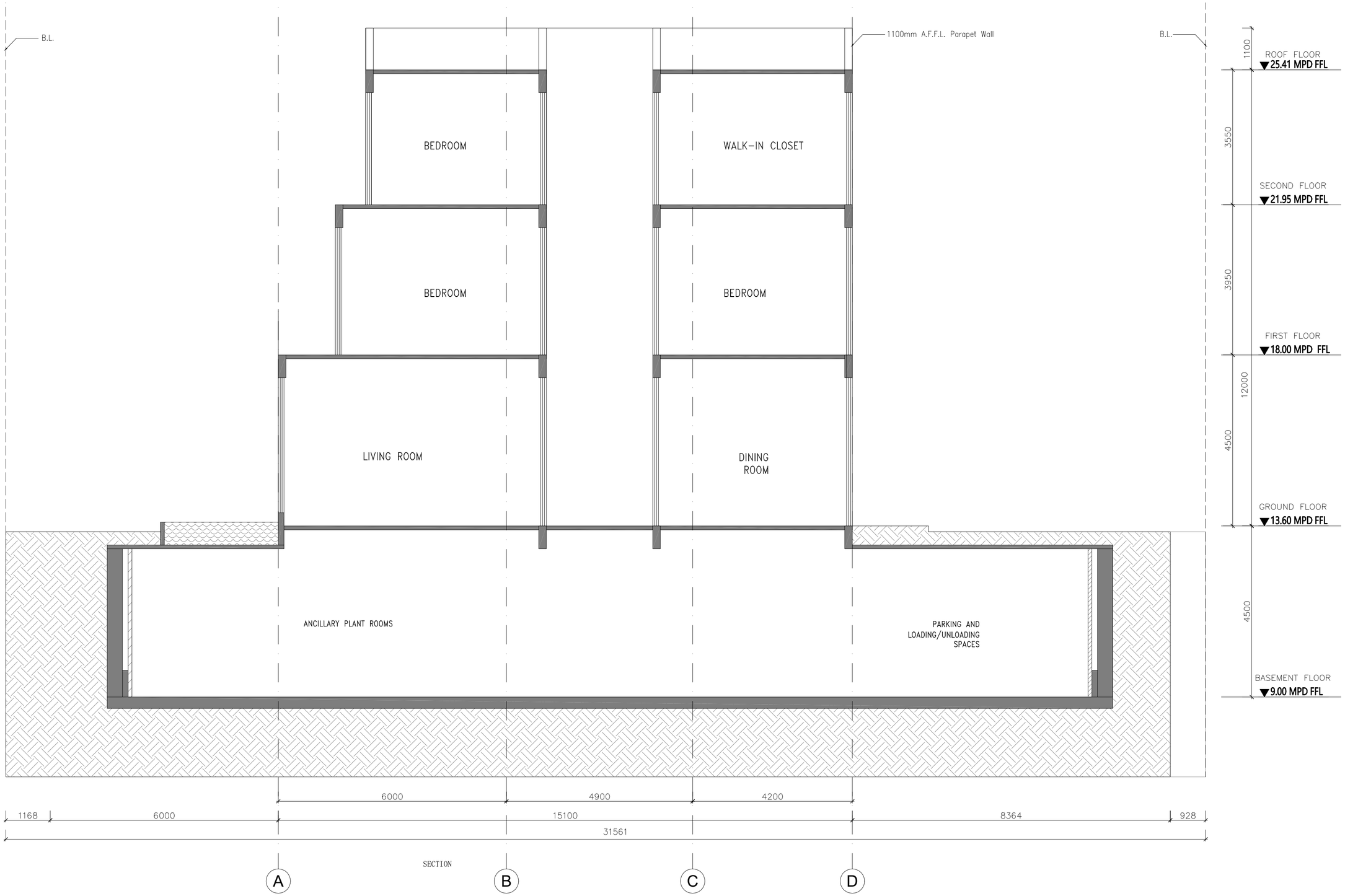
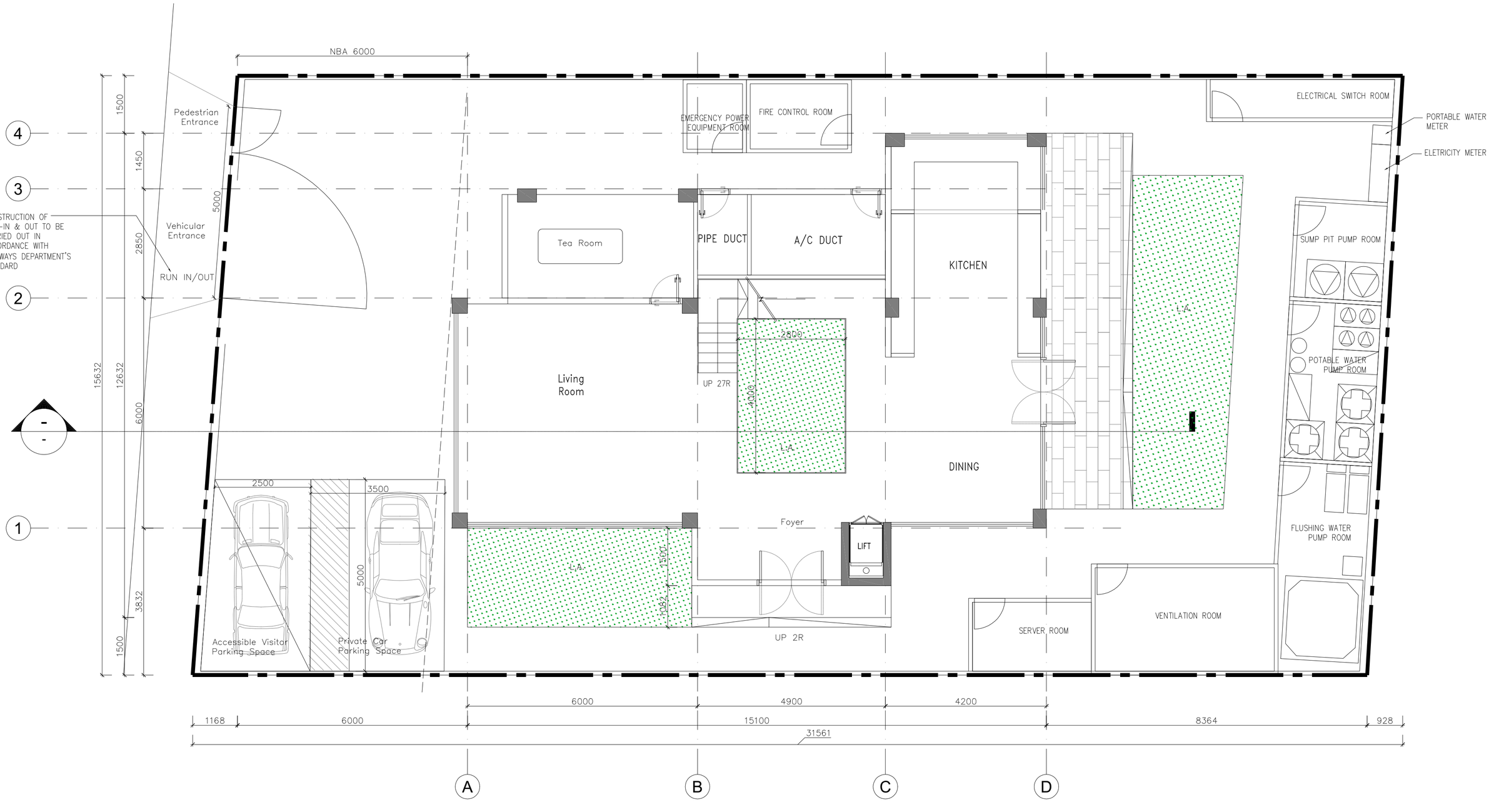
ROOF FLOOR



SECTION

SECTION

APPENDIX 2
OZP-COMPLIANT SCHEME



GROUND FLOOR

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4200
15100
8364
928
31561
BATHROOM
MULTI-PURPOSE ROOM
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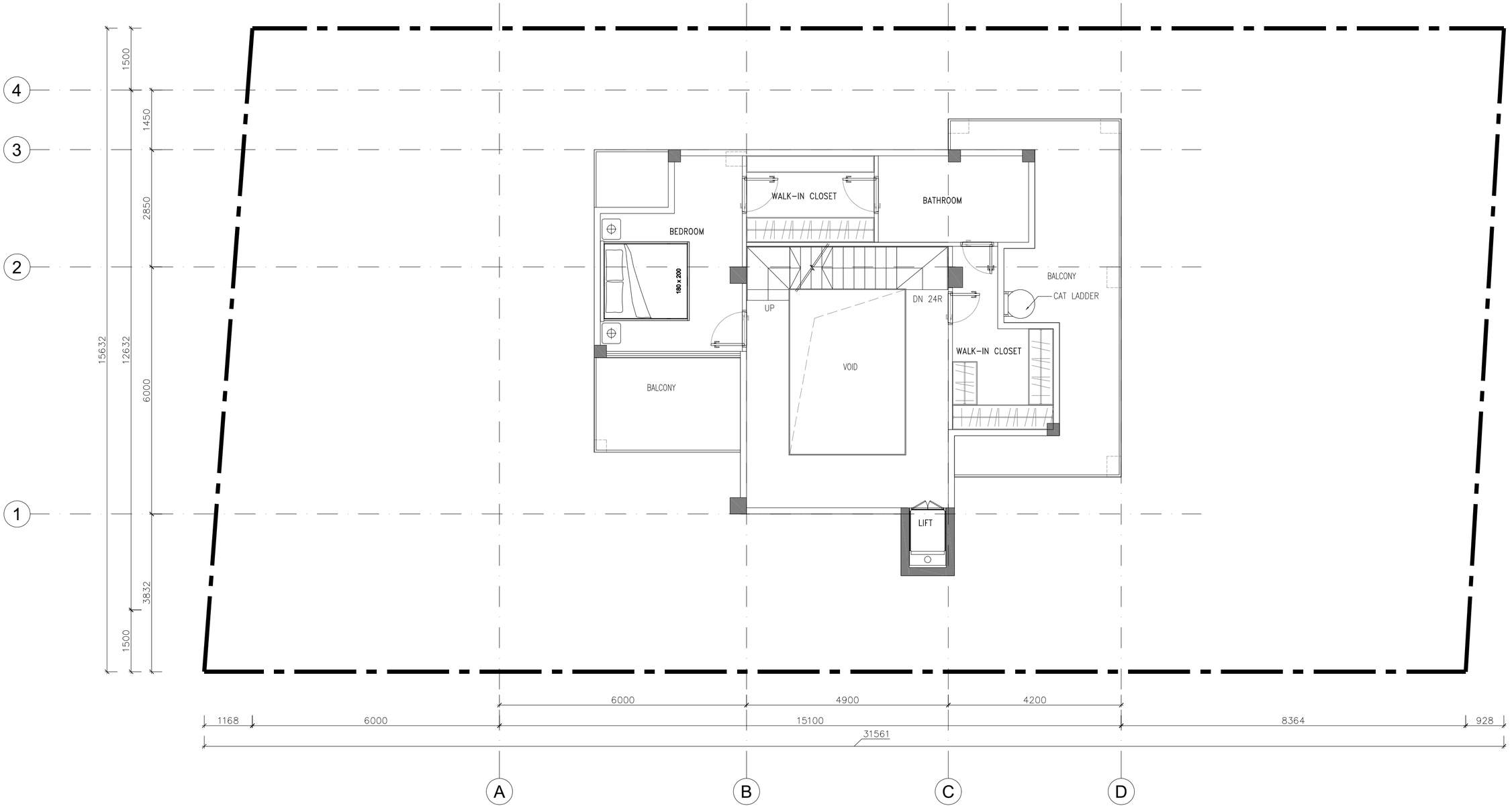
BALCONY
BEDROOM
BATHROOM
BATHROOM
BEDROOM
BALCONY
LIFT
BALCONY

FIRST FLOOR



SECOND FLOOR

Boiler Room
A.H.U Room
(Central Fresh air)
Duct Room
1100mm A.F.F.L. Parapet Wall
1100mm A.F.F.L. Parapet Wall
CAT LADDER
VOID
ROOF
4
3
2
1
A
B
C
D
1500
1450
2850
6000
3832
1500
15632
12632
6000
4900
4200
1168
6000
15100
8364
928
31561

ROOF FLOOR

B.L.
1100mm A.F.F.L. Parapet Wall
MASTER ROOM
WALK-IN CLOSET
ELDERS' ROOM
BEDROOM 2
Living Room
DINING
B.L.
1100
ROOF FLOOR
▼25.41 MPD
3550
SECOND FLOOR
▼21.95 MPD
3950
FIRST FLOOR
▼18.00 MPD
12000
4500
GROUND FLOOR
▼13.60 MPD
6000
4900
4200
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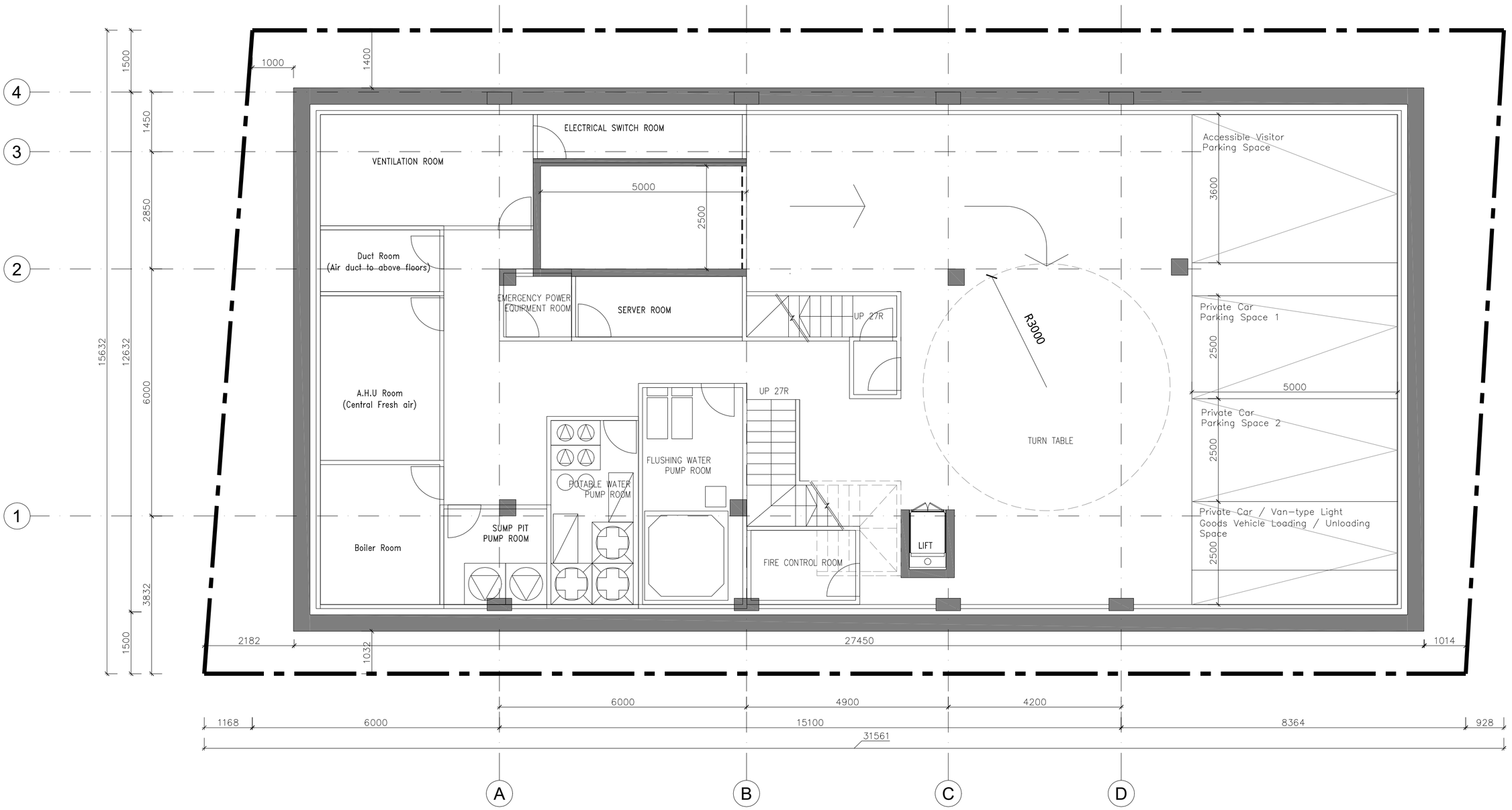
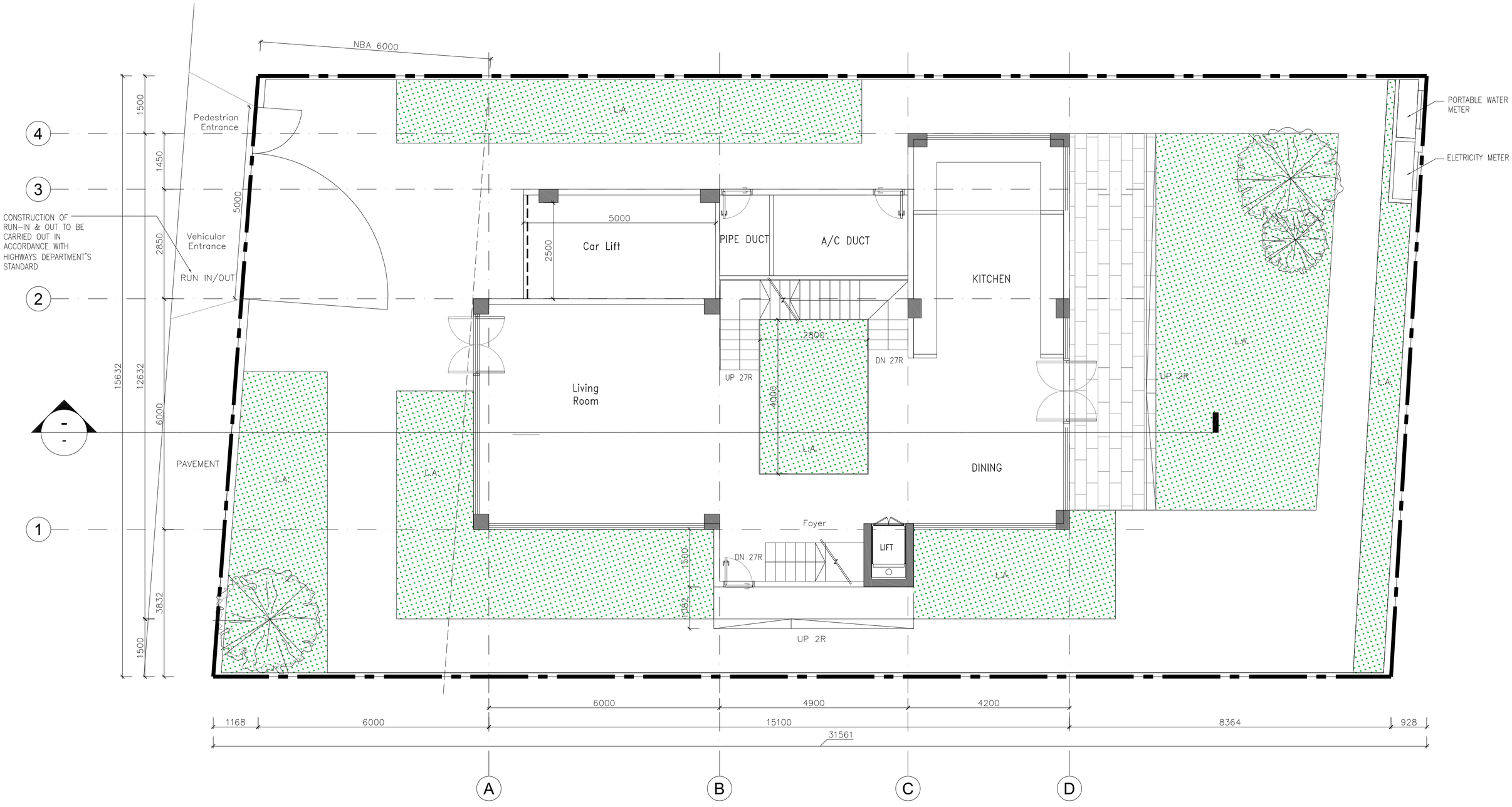
928
31561
SECTION
A
B
C
D

SECTION

APPENDIX 1
PROPOSED SCHEME



BASEMENT FLOOR



GROUND FLOOR

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12632
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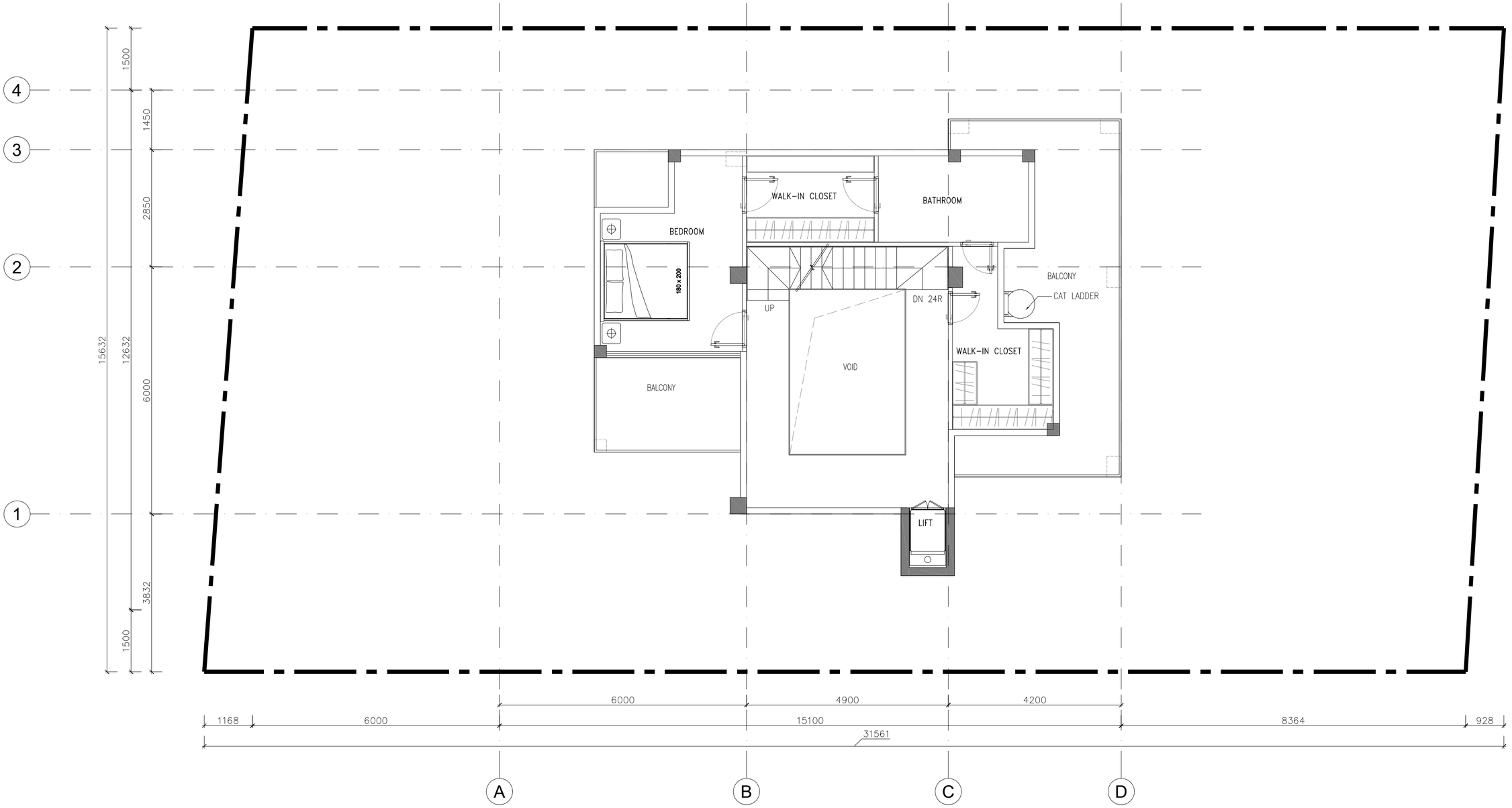
4200
15100
8364
928
31561
BATHROOM
MULTI-PURPOSE ROOM
P.A.
DN 28R
UP 24R
BALCONY
BEDROOM
VOID
P.A.
BALCONY
BEDROOM
BATHROOM
BATHROOM
BEDROOM
BALCONY
LIFT
BALCONY

FIRST FLOOR



SECOND FLOOR

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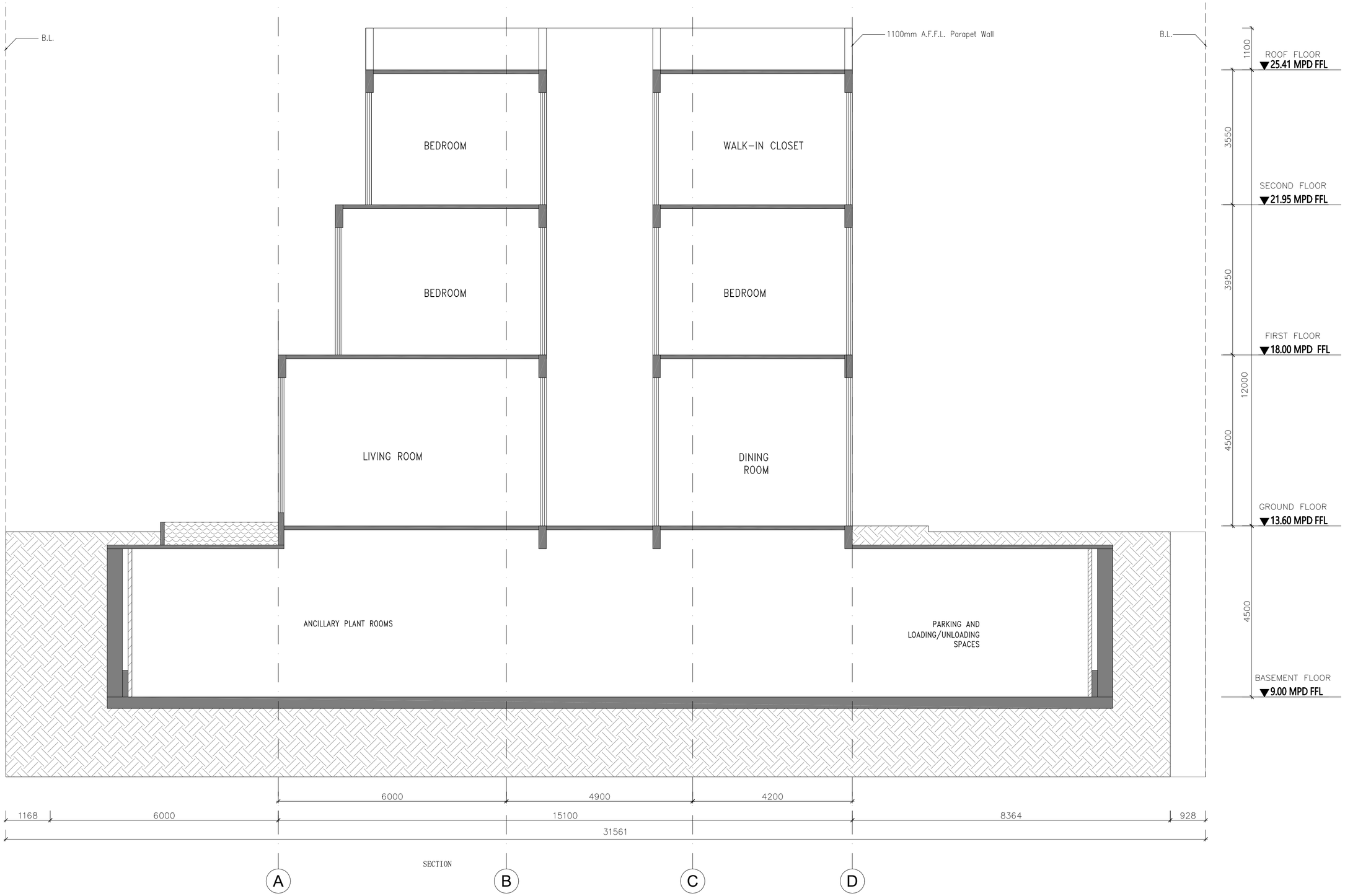
15632
3832
1500
1100mm A.F.F.L. Parapet Wall
ROOF
1100mm A.F.F.L. Parapet Wall
CAT LADDER
VOID
LIFT
OVERRUN
6000
4900
4200
1168
6000
15100
8364
928
31561

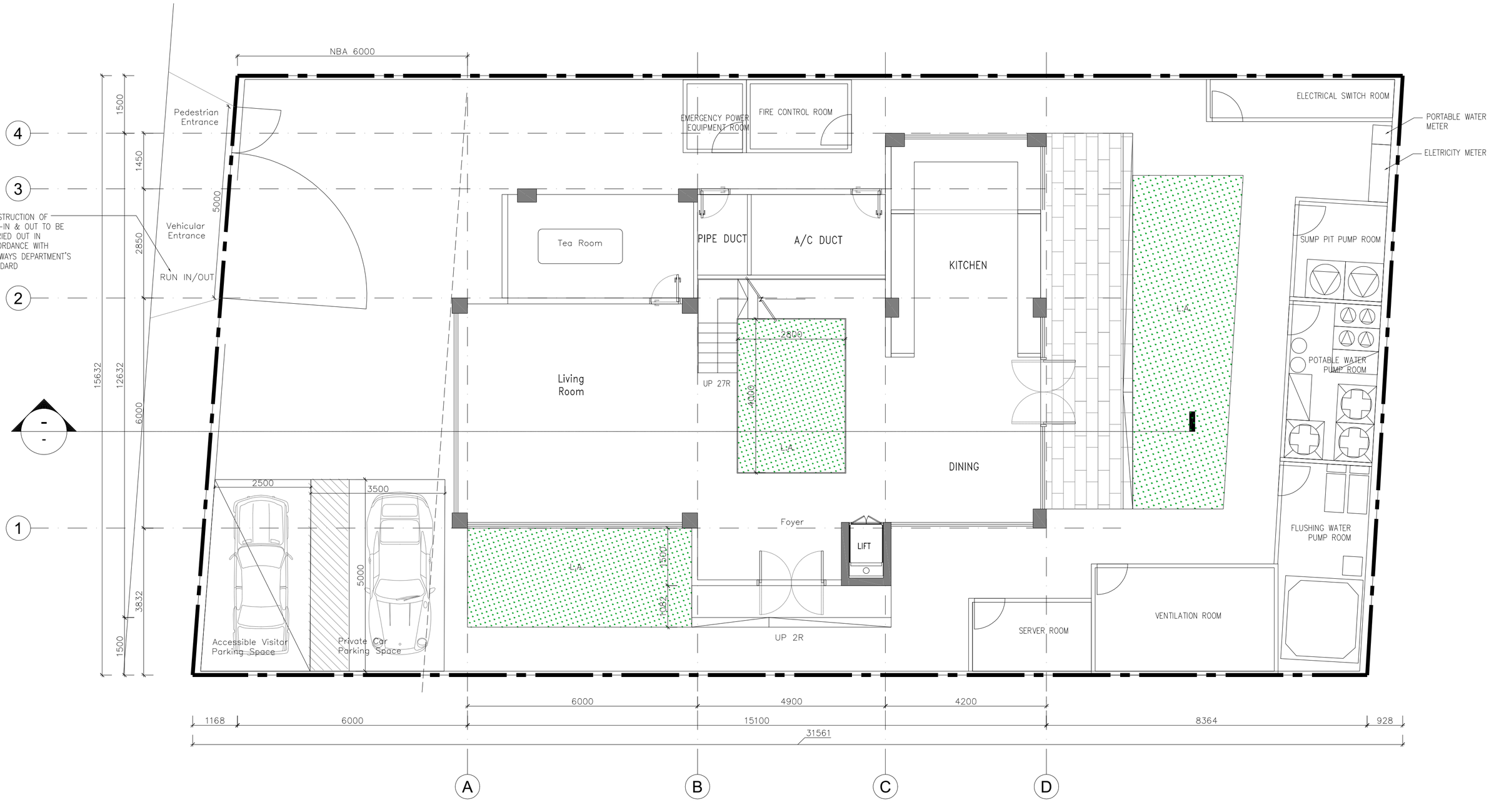
ROOF FLOOR



SECTION

SECTION

APPENDIX 2
OZP-COMPLIANT SCHEME



GROUND FLOOR

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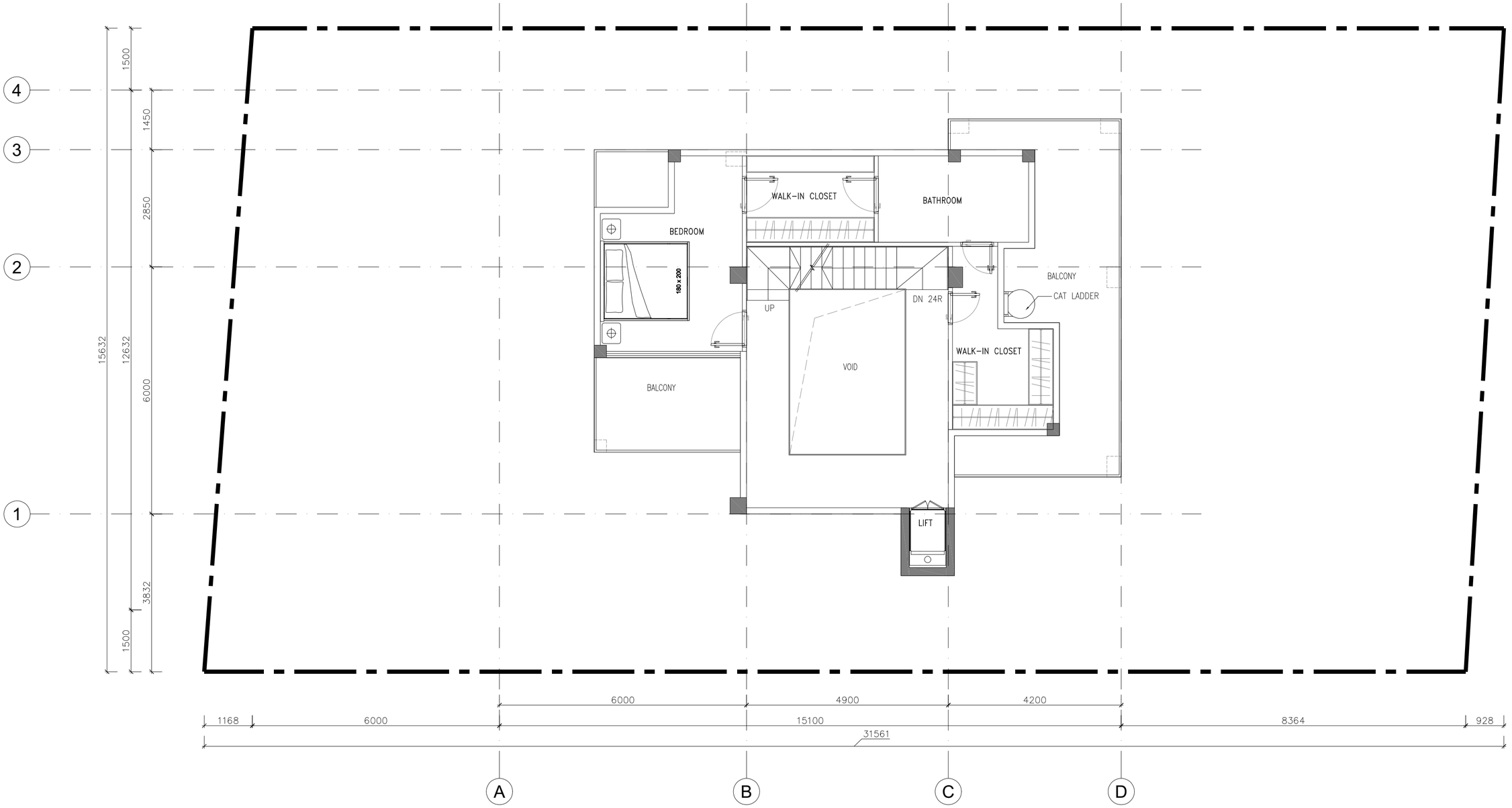
4900
4200
15100
8364
928
31561
BATHROOM
MULTI-PURPOSE ROOM
P.A.
DN 28R
UP 24R
BALCONY
BEDROOM
VOID
P.A.
BALCONY
BEDROOM
BATHROOM
BATHROOM
BEDROOM
BALCONY
LIFT
BALCONY

FIRST FLOOR



SECOND FLOOR

Boiler Room
A.H.U Room
(Central Fresh air)
Duct Room
1100mm A.F.F.L. Parapet Wall
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CAT LADDER
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1100mm A.F.F.L. Parapet Wall
MASTER ROOM
WALK-IN CLOSET
ELDERS' ROOM
BEDROOM 2
Living Room
DINING
B.L.
1100
ROOF FLOOR
▼25.41 MPD
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SECOND FLOOR
▼21.95 MPD
3950
FIRST FLOOR
▼18.00 MPD
12000
4500
GROUND FLOOR
▼13.60 MPD
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15100
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31561
SECTION
A
B
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D

SECTION

約克英文小學暨幼稚園（九龍塘）
York English Primary School and Kindergarten (Kowloon Tong)
京斯敦幼兒園
Kingston International Kindergarten
京斯敦國際幼稚園
文娜雅拔幼稚園暨兒童中心
Manhabit International Kindergarten / Nursery
金巴倫道
施他佛道
雅息士道
雅悉小築
Essex Lodge
C.W
NKIL 744
NKIL 758
NKIL 774
NKIL 775 S.A
NKIL 757
NKIL 773
NKIL 743
NKIL 756
NKIL 772
NKIL 742
NKIL 755 RP
NKIL 755 S.A
NKIL 771
*NKIL 741
NKIL 754
*NKIL 770
*NKIL 740
NKIL 753
NKIL 769
NKIL 739
*NKIL 752
NKIL 738
NKIL 737
NKIL 730
NKIL 729
*NKIL 736
NKIL 728
*NKIL 735
NKIL 727
*NKIL 6528
*NKIL 5402
836300E

DRAWING TITLE: EXCAVATION PLAN	**LEGEND:** APPLICATION SITE EXCAVATION AREA (AREA: ABOUT 362 sq.m.; DEPTH: ABOUT 4.65 m)	**DATE:** MAY 2026
DRAWING NO.: FIGURE 3		**PREPARED BY:** DeSPACE (International) Limited
SCALE: 1:500		

構 建 (國

DeSPACE (International) Limited

Date: 2nd June 2026

Pages: 1 + Attachments

BY HAND & EMAIL

(tpbpd@pland.gov.hk)

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

Dear Sir/Madam,

SECTION 16 APPLICATION
TOWN PLANNING ORDINANCE (CHAPTER 131)

****

PROPOSED MINOR RELAXATION OF BUILDING HEIGHT RESTRICTION TO ALLOW FOR ONE STOREY OF BASEMENT FOR CARPARKING AND ANCILLARY PLANT ROOM FOR THE PERMITTED HOUSE DEVELOPMENT AT NEW KOWLOON INLAND LOT NO. 754, 4 CUMBERLAND ROAD, KOWLOON TONG, KOWLOON

Town Planning Application No. A/K18/351 – Supplementary Information

Reference is made to the telephone correspondence dated 1st June 2026 concerning further comments from the Planning Department. The Applicant's minor clarifications and amendments have been incorporated in the replacement pages of the Application Form (**Attachment 1**), the Supplementary Planning Statement (**Attachment 2**), and the Appendix 2 – OZP-compliant Scheme (**Attachment 3**) for your consideration.

Should you have any queries with this submission, please feel free to contact Mr. Kenji Wong / Mr. Endy Cheng at [redacted]

Yours faithfully,
FOR AND ON BEHALF OF
DeSPACE (International) Limited

DeSPACE (International) Limited 構建(國際)有限公司

Greg Lam

cc: Mr. KWOK Man Hin, Ryan (Town Plnr/Kln 1; rmhkwok@pland.gov.hk)
Mr. LAM Tsz Ying, Tony (Town Planning Grad/Kln 1; ttylam@pland.gov.hk)

Attachment 1
Replacement Pages of Application Form

For Official Use Only 請 勿 填 寫 此 欄	Application No. 申請編號	
	Date Received 收到日期	

1. The completed form and supporting documents (if any) should be sent to the Secretary, Town Planning Board (the Board), 15/F, North Point Government Offices, 333 Java Road, North Point, Hong Kong.
申請人須把填妥的申請表格及其他支持申請的文件 (倘有)，送交香港北角渣華道 333 號北角政府合署 15 樓城市規劃委員會(下稱「委員會」)秘書收。

2. Please read the "Guidance Notes" carefully before you fill in this form. The document can be downloaded from the Board's website at http://www.tpb.gov.hk/. It can also be obtained from the Secretariat of the Board at 15/F, North Point Government Offices, 333 Java Road, North Point, Hong Kong (Tel: 2231 4810 or 2231 4835), and the Planning Enquiry Counters of the Planning Department (Hotline: 2231 5000) (17/F, North Point Government Offices, 333 Java Road, North Point, Hong Kong and 14/F, Sha Tin Government Offices, 1 Sheung Wo Che Road, Sha Tin, New Territories).
請先細閱《申請須知》的資料單張，然後填寫此表格。該份文件可從委員會的網頁下載 (網址：http://www.tpb.gov.hk/)，亦可向委員會秘書處 (香港北角渣華道 333 號北角政府合署 15 樓 – 電話：2231 4810 或 2231 4835)及規劃署的規劃資料查詢處(熱線：2231 5000) (香港北角渣華道 333 號北角政府合署 17 樓及新界沙田上禾輋路 1 號沙田政府合署 14 樓)索取。

3. This form can be downloaded from the Board's website, and obtained from the Secretariat of the Board and the Planning Enquiry Counters of the Planning Department. The form should be typed or completed in block letters. The processing of the application may be refused if the required information or the required copies are incomplete.
此表格可從委員會的網頁下載，亦可向委員會秘書處及規劃署的規劃資料查詢處索取。申請人須以打印方式或以正楷填寫表格。如果申請人所提交的資料或文件副本不齊全，委員會可拒絕處理有關申請。

---

1. Name of Applicant 申請人姓名/名稱

(☐ Mr. 先生 / ☐ Mrs. 夫人 / ☐ Miss 小姐 / ☐ Ms. 女士 / ☐ Company 公司 / ☐ Organisation 機構)

MR. SHENG FANG & Ms. YANG JUAN

2. Name of Authorised Agent (if applicable) 獲授權代理人姓名/名稱（如適用）

(☐ Mr. 先生 / ☐ Mrs. 夫人 / ☐ Miss 小姐 / ☐ Ms. 女士 / ☑ Company 公司 / ☐ Organisation 機構)

DeSPACE (International) Limited

3. Application Site 申請地點

(a) Full address / location / demarcation district and lot number (if applicable) 詳細地址／地點／丈量約份及地段號碼（如適用）	4 Cumberland Road, Kowloon Tong, Kowloon New Kowloon Inland Lot No. 754
(b) Site area and/or gross floor area involved 涉及的地盤面積及／或總樓面面積	☑Site area 地盤面積 478.48 sq.m 平方米☑About 約 ☑Gross floor area 總樓面面積 287 sq.m 平方米☑About 約
(c) Area of Government land included (if any) 所包括的政府土地面積（倘有）	N.A sq.m 平方米 ☐About 約

(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		to 至	
☐	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	mPD 米 (主水平基準上)	to 至	mPD 米 (主水平基準上)
		From 由	3 storeys 層	to 至	4 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

(a) Proposed use(s)/development 擬議用途/發展	Proposed Minor Relaxation of Building Height Restriction to Allow for One Storey of Basement for Carparking and Ancillary Plant Room for the Permitted House Development (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	287	sq.m 平方米	☑About 約
Proposed plot ratio 擬議地積比率	0.6		☑About 約
Proposed site coverage 擬議上蓋面積	30	%	☑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	4	storeys 層	
	☑ include 包括 1	storeys of basements 層地庫	
	☐ exclude 不包括	storeys of basements 層地庫	
Proposed building height of each block 每座建築物的擬議高度	25.4	mPD 米(主水平基準上)	☑About 約
		m 米	☐About 約

☑ Domestic part 住用部分

GFA 總樓面面積	287	sq. m 平方米	☑About 約
number of Units 單位數目	1		
average unit size 單位平均面積		sq. m 平方米	☐About 約
estimated number of residents 估計住客數目			

☐ Non-domestic part 非住用部分 — GFA 總樓面面積

☐ 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)

☐ Open space 休憩用地 (please specify land area(s) 請註明地面面積)

☐ private open space 私人休憩用地	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]
1	B/F	Ancillary plant rooms, car parking
	G/F	Domestic use
	1/F	Domestic use
	2/F	Domestic use

(d) Proposed use(s) of uncovered area (if any) 露天地方（倘有）的擬議用途

Landscaping provision

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	4 Cumberland Road, Kowloon Tong, Kowloon New Kowloon Inland Lot No. 754
Site area 地盤面積	478.48 sq. m 平方米 ☑ About 約 (includes Government land of 包括政府土地 sq. m 平方米 ☐ About 約)
Plan 圖則	Approved Kowloon Tong Outline Zoning Plan No. S/K18/21
Zoning 地帶	Residential (Group C)1
Applied use/ development 申請用途/發展	Proposed Minor Relaxation of Building Height Restriction to Allow for One Storey of Basement for Carparking and Ancillary Plant Room for the Permitted House Development

(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	287	☑ About 約 ☐ Not more than 不多於	0.6	☑About 約 ☐Not more than 不多於
	Non-domestic 非住用		☐ About 約 ☐ Not more than 不多於		☐About 約 ☐Not more than 不多於
(ii) No. of blocks 幢數	Domestic 住用	1			
	Non-domestic 非住用				
	Composite 綜合用途				

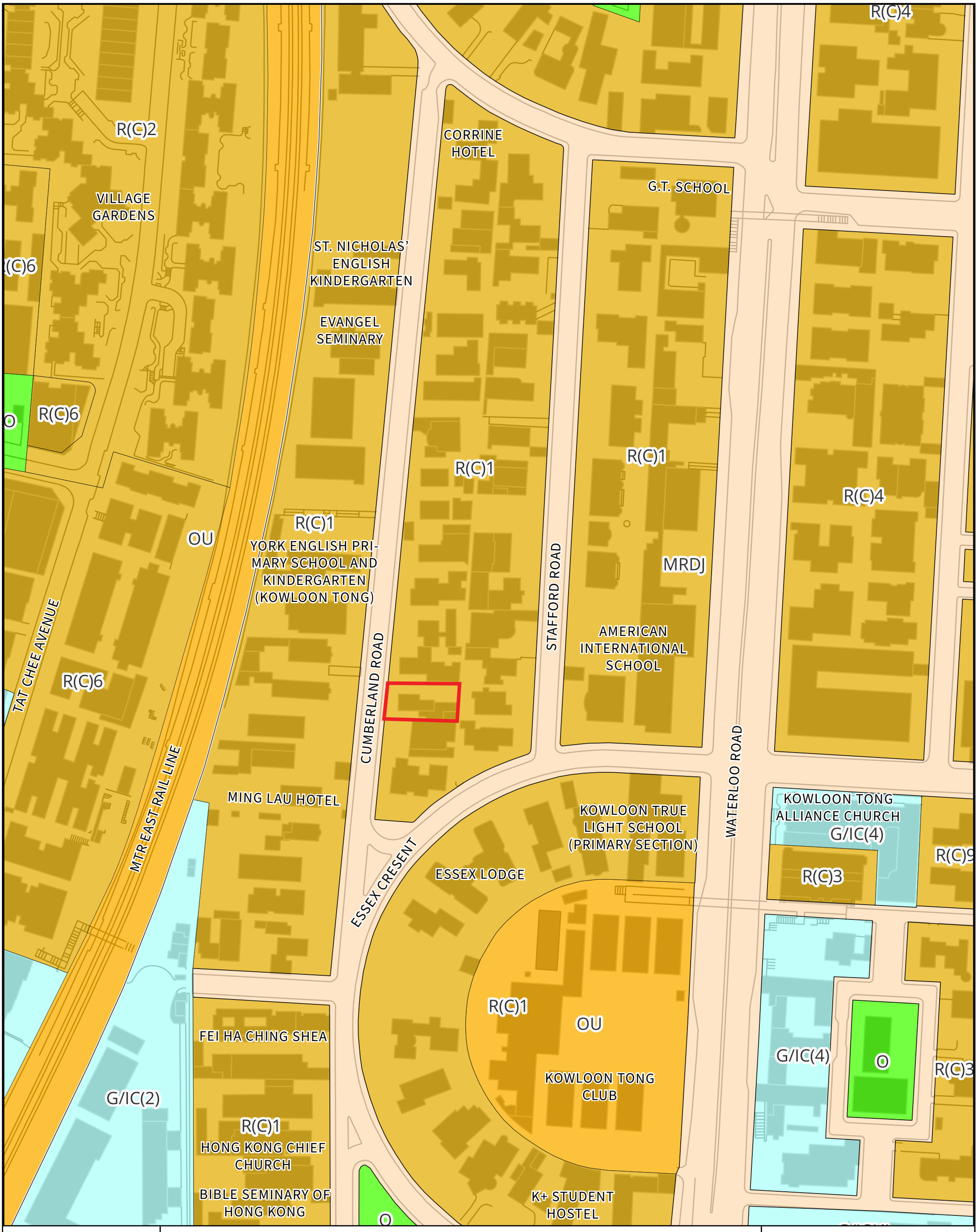
(vii) No. of parking spaces and loading / unloading spaces 停車位及上落客貨車位數目	Total no. of vehicle parking spaces 停車位總數	3
	Private Car Parking Spaces 私家車車位	3
	Motorcycle Parking Spaces 電單車車位	
	Light Goods Vehicle Parking Spaces 輕型貨車泊車位	
	Medium Goods Vehicle Parking Spaces 中型貨車泊車位	
	Heavy Goods Vehicle Parking Spaces 重型貨車泊車位	
	Others (Please Specify) 其他 (請列明)	
	_____	
	_____	
	Total no. of vehicle loading/unloading bays/lay-bys 上落客貨車位／停車處總數	1
	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 中型貨車位	
	Heavy Goods Vehicle Spaces 重型貨車車位	
	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, Lot Index Plan, Excavation Plan, OZP-compliant Scheme		
_____		
_____		
Reports 報告書		
Planning Statement/Justifications 規劃綱領/理據	☐	☑
Environmental assessment (noise, air and/or water pollutions) 環境評估（噪音、空氣及／或水的污染）	☐	☐
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）	☐	☐
_____		
_____		

Note: May insert more than one「✔」. 註：可在多於一個方格內加上「✔」號

Attachment 2
Replacement Pages of Supplementary Planning Statement



DRAWING TITLE: LOCATION PLAN	**LEGEND:** APPLICATION SITE	**DATE:** MAY 2026
DRAWING NO.: FIGURE 1		**PREPARED BY:** DeSPACE (International) Limited
SCALE: 1:1000		

2. SITE CONTEXT

2.1 APPLICATION SITE AND SURROUNDING AREAS

2.1.1 The Application Site is located at 4 Cumberland Road, Kowloon Tong, comprising a site area of approximately 478.48 sq. m. (refer to **Figure 2 – Lot Index Plan**). The site is currently occupied by a house.

2.1.2 The Application Site falls within the Kowloon Tong Garden Estate ("KTGE"), a well-established low-rise, low-density residential neighbourhood of recognised character. The surrounding built environment is characterised by high-quality detached houses generally ranging from 1 to 4 storeys in height.

2.1.3 Whilst the immediate vicinity is predominantly residential in nature, the wider neighbourhood accommodates a range of compatible non-residential uses, including educational institutions, religious establishments and hotels.

2.2 LEASES

2.2.1 The Application Site forms part of New Kowloon Inland Lot No. 754 (**Figure 2** refers) and is held under a Government Lease. In common with other leases in the locality, the lot is subject to the following restrictions:

(a) the lessee shall keep and maintain on the lot a messuage or dwelling house throughout the entire term of the lease;
(b) rate and range clause;
(c) offensive trade clause; and
(d) the lessee shall not erect any additional messuage or dwelling house on the lot without the prior written consent of the Director of Lands.

2.2.2 Should the subject Section 16 application be approved, the owners will be required to apply separately to the Lands Department for a consent under lease for the Proposed Redevelopment or a lease modification to implement the proposal.

4. THE PROPOSED REDEVELOPMENT

TABLE 2 – KEY DEVELOPMENT PARAMETERS

Development Parameters	OZP-compliant Scheme	Proposed Scheme	Compliancy
Site Area	About 478.48 sq. m. (or 5,150.47 sq. ft.)		N/A
Gross Floor Area ("GFA")	About 286 sq. m.	About 286 sq. m. (1)	B(P)R complied
Plot Ratio ("PR")	About 0.60	About 0.60	OZP Complied
Building Height ("BH")	About 25.4 mPD	About 25.4 mPD	JPN5 complied
No. of Storeys	3 storeys	**4 storeys (including 1 level of basement)**	Minor relaxation to be sought
Site Coverage ("SC")	About 26%	**Not more than 30%**	Within the range to cases in **Table 1**
Ratio of Basement to Site Area	N/A	**Maximum 76%**	Within the range to cases in **Table 1**
Greening Ratio	About 8.5%	**Not less than 20%**	Within the range to cases in **Table 1**
Car Parking	2 Private Car Parking Spaces (including 1 Accessible Visitor Car Parking Space)	**3 Private Car Parking Spaces (including 1 Accessible Visitor Car Parking Space)**	Within an acceptable range in relation to site area compared to cases in **Table 1**
Loading/Unloading ("L/UL") Facilities	N/A	**1 Private Car, Van-type Light Goods Vehicle ("LGV") Space**	Within an acceptable range in relation to site area compared to cases in **Table 1**

(1) According to the Practice Note for Authorised Persons, Registered Structural Engineers and Registered Geotechnical Engineers (PNAP) No. APP-2, the GFA of the proposed basement private car park, ancillary plant rooms, and access staircases can be disregarded under the Buildings Ordinance.

Attachment 3
Replacement Pages of Appendix 2 – OZP-compliant Scheme

B.L.
BOILER ROOM
DUCT ROOM
1100mm A.F.F.L. Parapet Wall
MASTER ROOM
WALK-IN CLOSET
ELDERS' ROOM
BEDROOM 2
Living Room
DINING
B.L.
2950
ROOF FLOOR
▼25.41 MPD
3550
SECOND FLOOR
▼21.95 MPD
3950
FIRST FLOOR
▼18.00 MPD
12000
4500
GROUND FLOOR
▼13.60 MPD
6000
4900
4200
1168
6000
15100
8364
928
31561
A
B
C
D

DeSPACE (International) Limited

Date: 7th July 2026

BY HAND & EMAIL

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

Dear Sir/Madam,

SECTION 16 APPLICATION
TOWN PLANNING ORDINANCE (CHAPTER 131)

****

PROPOSED MINOR RELAXATION OF BUILDING HEIGHT RESTRICTION TO ALLOW FOR ONE STOREY OF BASEMENT FOR CARPARKING AND ANCILLARY PLANT ROOM FOR THE PERMITTED HOUSE DEVELOPMENT AT NEW KOWLOON INLAND LOT NO. 754, 4 CUMBERLAND ROAD, KOWLOON TONG, KOWLOON

Planning Application No. A/K18/351 – Further Information (1)

References are made to the emails dated 16th, 24th and 30th June 2026 regarding comments from various government departments.

To address the comments, please find the attached documents for your reference:

- Response-to-comment (R-to-C) table (**Attachment 1**) ;and
- The Revised Planning Statement (**Attachment 2**).

Should you have any queries with this submission, please feel free to contact Mr. Endy Cheng and Mr. Arthur Ma / Kenji Wong at [redacted] or the undersigned at [redacted].

Yours faithfully,
FOR AND ON BEHALF OF
DeSPACE (INTERNATIONAL) LIMITED

DeSPACE (International) Limited 構建(國際)有限公司

P.P.
Greg Lam

Town Planning Application No. A/K18/351

Attachment 1: Response-to-Comment Table (Departmental Comments)

Departmental Comments	*Response*
Planning Department received on 17.6.2026 by email	
1. It is noted that the proposed basement is not more than 76% of the site area, please provide the basement size. Please justify and demonstrate the scale of proposed basement is not excessive.	The basement size is provided in Table 2 of **Attachment 2 – Replacement Pages for Supplementary Planning Statement (SPS)**. With reference to the revised Section 5.3 in Attachment 2, the proposed basement is sized exclusively to accommodate car parking provisions as agreed by the Transport Department and essential ancillary plant rooms, with no portion devoted to any extraneous use. The revised basement-to-site area ratio of about 75.6% falls squarely within the established precedent range of 41% to 76% as set out in Table 1 the SPS. The relatively high ratio is a direct consequence of the constrained site area, noting that the Application Site is only 48% to 66% of the site areas of the reference cases in Table 1 — such that standard car parking spaces, loading/unloading space, and modest ancillary plant room to be housed in the basement will represent a comparatively high proportion of the total site area. The proposed basement is therefore considered to be of an appropriate, justified and not excessive scale in the circumstances of this application.
2. Please justify the increase in site coverage of the proposed scheme compared with the OZP-compliance scheme while most of the aboveground plant rooms and ancillary facilities have been provided in the basement level.	The site coverage is revised. Please refer to Table 2 of the SPS.

Departmental Comments	*Response*
3. It is noted that the greenery ratio for the proposed development will be not less than 20%, situating at G/F and 1/F. Please provide detailed information about the proposed greenery. Please also provide a landscape proposal clearly demonstrate the landscape treatment for our assessment.	The greenery ratio is revised. Please refer to Table 2 of the SPS for the revised pages of the Supplementary Planning Statement, and a new **Appendix 3 – Landscape Proposal** in **Attachment 2 (SPS)**.
4. For G/F and 1/F floor plans, please annotate the green dotted area.	The floor plans are revised. Please refer to **Appendix 1 – Proposed Scheme** and **Appendix 2 – OZP-compliant Scheme** in **Attachment 2 (SPS).**
5. For G/F, it is noted there are three trees, please clarify if they are existing trees or proposed new trees.	As per the latest revised floor plans of **Appendix 1** and the new **Appendix 3 of Attachment 2**, the proposed new trees constitute a part of the Landscape Proposal.
6. It is noted from the floor plan that there are building structure on 1/F encroached onto the 6m-wide NBA facing from Cumberland Road which will defeat the intention of providing NBA. Please rectify the plans to align with such intention. The setback of 1/F and 2/F from Cumberland Road should also be provided.	Please be clarified that that the building structure on 1/F does not encroach onto the NBA. The building has a setback of about 7.8 meters for 1/F and 2/F from Cumberland Road, please refer to the floor plans in **Appendix 1** and **Appendix 2 of SPS.**
7. Please indicate the lift overrun on R/F plan and show all the ancillary facilities on the section plans for both proposed and OZP-compliant schemes. Please also provide the height of all the ancillary facilities including the stair hood and plant rooms, and the lift overrun.	Heights of all ancillary facilities on R/F are supplemented in **Appendix 1** and **Appendix 2 of SPS**, subject to detailed design.
8. It is noted that the planning statement that the provision of basement facilities will not compromise meaningful at-grade greening by allowing sufficient soil depth proposed in PNAP APP-152. Please elaborate how the proposed basement will not affect the at-grade greening.	According to the new Landscape Proposal (**Appendix 3**), landscaping opportunities would be a mix of planters and at-grade planting, whereas sufficient soil depth will be provided. Please refer to the revised sections in **Appendix 1**.
9. It is noted that the car parking provision for the proposed scheme and OZP compliant scheme are different. Please clarify for a fair comparison provided that the development intensity is the same for the proposed and OZP-compliant schemes.	It is clarified that both the Proposed Scheme and the OZP-compliant Scheme adopt the same development intensity, and the comparison is made on a like-for-like basis. The difference in car parking provision between the two schemes is not an inconsistency but rather a direct illustration of the planning justification for the basement. As the comparison demonstrates, an OZP-compliant scheme at the same development intensity would result in a reduced level of greening,

Departmental Comments	*Response*
	while spatial constraints at grade would further limit the ability to provide adequate car parking for Transport Department's agreement. The Proposed Scheme resolves both constraints without any increase in above-ground bulk by accommodating car parking and ancillary plant rooms below ground.
10. For the section of the OZP-compliant scheme, AHU room is missing in the section submitted in the SI, please update.	Section of the OZP-compliant Scheme is revised in **Appendix 2 of SPS**.
11. The footprint of the roof plan for the proposed development and the OZP-compliant scheme is different, please clarify and rectify.	Please refer to the revised roof plans in **Appendix 1 and Appendix 2 of SPS.**
Landscape Unit, Urban Design and Landscape Section, Planning Department received on 17.6.2026 by email	
1. We have reservation on the application from landscape planning perspective. Our detailed comments on the subject application are as follows:	Noted.
2. Based on aerial photo taken in 2024, the Site is located in area of urban landscape character characterised by low-rise residential houses and schools and religious institutions;	Noted with thanks.
3. With reference to DPO's site photos taken on 12.6.2026, the Site was formed with existing building. Some vegetation are found within the Site; and	Noted with thanks.
4. According to Explanatory Statement (ES) of Kowloon Tong OZP (S/K18/21), the construction of the basement should not cause any adverse impacts to the existing tree or deteriorate the distinctiveness of the area as a garden estate. The Excavation Plan submitted by the Applicant indicated that the extent of the excavation area would be close to the site boundary. The Applicant has not provided any supporting information to demonstrate that the proposed basement would not cause adverse impacts on the existing tree or deteriorate the distinctive garden estate.	Please note that there are no existing trees within the Subject Lot. A setback of approximately 1 m to 1.4 m from the site boundary will be reserved around the Subject Lot to facilitate excavation works and to avoid damage to existing trees outside the site. During the excavation works, contractors will be required to be supervised by qualified tree specialists and to adopt the necessary protective measures to prevent any damage to the existing trees.

Departmental Comments	*Response*
	The existing boundary wall enclosing the site, together with its substructure, helps to block most roots from extending into the site. With the above mitigation measures, it is anticipated that the proposed basement would not cause any adverse impact on the existing trees.
5. The applicant should be advised that approval of the application does not imply approval of tree works such as pruning, transplanting and felling. Application for any tree works should be submitted to relevant departments for approval.	Noted with thanks.
6. For compliance of site coverage of greenery requirements under PNAP APP-152, submission should be made to Buildings Department for comments and approval.	Noted with thanks.
Urban Design Unit, Urban Design and Landscape Section, Planning Department received on 17.6.2026 by email	
1. We have no adverse comments on the application from urban design and visual perspectives.	Noted with thanks.
2. The subject site with an area of about 478.48m^2, abutting Cumberland Road, forms part of a street block zoned "Residential (Group C)1" ("R(C)1") with development restriction of maximum plot ratio (PR) of 0.6 and a building height restriction (BHR) of 3 storeys. Since the proposed minor relaxation of BHR only involves an additional basement floor and a 6m-wide non-building area along the western site boundary is proposed in accordance with the Kowloon Tong Outline Development Plan No. D/K18/1A, it would unlikely cause any change to the perceivable massing/bulk of the proposed development above-ground. In view of the above, the proposed development with BH of 4 storeys (including 1 storey of basement) is considered not incompatible with the surrounding area and would unlikely induce significant adverse impact on the visual character of the townscape.	Noted with thanks.

Departmental Comments	*Response*
Architectural Services Department received on 17.6.2026 by email	
1. Based on the information provided, it is noted that the proposed development mainly consists of 1 building with a plot ratio (PR) of 0.6 and a building height (BH) of 4 storeys (including 1 storey of basement), which is a 33% increase in BH from the BH restriction as stipulated in the current Outline Zoning Plan (OZP). Since the design, disposition, and height of the above-ground building structure are largely the same with those of an OZP-complaint scheme, we have no comment from architectural and visual impact point of view, subject to PlanD's view.	Noted with thanks.
Geotechnical Engineering Office, Civil Engineering and Development Department received on 17.6.2026 by email	
1. The Geotechnical Engineering Office (GEO) has no adverse geotechnical comment on the captioned application.	Noted with thanks.
East Development Office, Civil Engineering and Development Department received on 17.6.2026 by email	
1. Please be advised that we have no comment on the captioned from project interface perspective.	Noted with thanks.
Electrical and Mechanical Services Department received on 17.6.2026 by email	
1. Please be advised that we have no comment from our regulatory services perspective.	Noted with thanks.
Fire Services Department received on 17.6.2026 by email	
1. Please be informed that I have no specific comment on the captioned proposal subject to water supplies for firefighting and fire service installations being provided to the satisfaction of the Director of Fire Services.	Noted with thanks.
2. Detailed fire services requirements will be formulated upon receipt of a formal submission of STT/STW, general building plans or	Noted with thanks.

Departmental Comments	*Response*
referral of application via relevant licensing authority. Furthermore, the EVA provision in the captioned work shall comply with the requirements as stipulated in Section 6, Part D of the Code of Practice for Fire Safety in Buildings 2011, which is administered by the Building Authority.	
Hong Kong Police Force received on 17.6.2026 by email	
1. Please note that we have no comment on the proposed application.	Noted with thanks.
Kowloon City District Office received on 17.6.2026 by email	
1. This office has no comment on the subject application providing that the applicant can fulfill the conditions set out by other departments.	Noted with thanks.
District Lands Office/Kowloon East, Lands Department received on 17.6.2026 by email	
1. The application site is located at New Kowloon Inland Lot No.754 ("the Lot") which is subject to a lease term having been extended up to 30 June 2047. Pursuant to the lease governing the Lot, the Lessee shall during the whole of the lease term keep and maintain in the Lot a messuage or dwelling house which is subject to the front and range clause and other conditions as contained in the lease. It is further specified in the lease that the Lessee shall not erect any other messuage or dwelling house on the Lot without prior consent in writing of the Direction of Public Works (now the Director of Lands).	Noted with thanks.
2. If the planning application is approved by the Town Planning Board, the owner of the Lot shall apply to Lands Department ("LandsD") for a consent under lease for the proposed redevelopment or a lease modification to implement the proposal. However, there is no guarantee that such application will be approved. Such application, if received, will be processed by LandsD in the capacity as a landlord and if the application is approved, it will subject to such terms and	Noted with thanks.

Departmental Comments	*Response*
conditions including, inter alia, payment of premium and administrative fee as may be imposed by LandsD.	
Water Supplies Department received on 17.6.2026 by email	
1. No comment on the application.	Noted with thanks.
Transport Department received on 17.6.2026 by email	
1. I have no adverse comment on the proposed 2 nos. of ancillary PC parking spaces, 1 no. of visitor PC parking space, and 1 no. of LGV loading/unloading bay for the proposed development comprising one single family house with GFA >220m^2, and	Noted with thanks.
2. The vehicular access should be provided within the specified X-Z-Y points according to the lease, I have no comment on the proposed clear width of 5m.	Noted with thanks. It should be noted that the prevailing lease has not indicated any specified X-Z-Y points.
3. Noting the car lift and turn table are proposed within the subject development; I have no adverse comment on the manoeuvring space for the carpark area provided that the car lift and turn table will be properly managed and operated.	Noted with thanks.
Drainage Services Department received on 24.6.2026 by email	
1. <u>Sewerage Impact Assessment (SIA)</u> Please note that EPD is the planning authority of sewerage infrastructure, submission of SIA or any sewerage review shall be circulated to SIG/EPD for their comments and approval. Subject to EPD, it may be required to assess and demonstrate the potential sewerage impact to the existing sewerage system, and formulate appropriate mitigation measures if any adverse sewerage impact is identified.	Noted with thanks.

Departmental Comments	*Response*
2. <u>Drainage Impact Assessment</u> Please advise: i. Paved/unpaved area ratio before and after the proposed development; ii. Any change in discharge point which leads to change in flow rate to existing public drainage system; iii. Any change in site formation level.	i. Please note that there is no change in the paved-to-unpaved area ratio before and after the proposed development; it remains at 1:1. ii. There is no change to the existing drainage point with the two drainage pipes running from west to east along the boundary wall and connected and discharging to the existing public drainage system. iii. There is no change for the site formation level.
3. Understanding that there would be basement in the proposed development, please advise whether any resilience measures would be implemented.	Before the excavation for the construction of the basement, sheet pilings ND lateral supports shall be installed. Tight monitoring for vibrations, tiltings and settlements shall be conducted during the basement excavation works to make sure the integrity and stability of the adjoining buildings/structures will not be affected. The drawings for excavation have to be submitted to BD & GEO for approval.
4. Please note that this is a coordinated reply from the Mainland South Division and the Land Drainage Division of DSD.	Noted with thanks.
Environmental Protection Department received on 24.06.2026 by email	
1. Based on the information provided, we have no adverse comment on the subject planning application from environmental planning perspective.	Noted with thanks.
2. Nevertheless, considering sewerage system is available in the vicinity, the applicant is reminded that the implementation of local sewer connection works shall meet the satisfaction of DSD.	Noted with thanks.
Building Department received on 30.06.2026 by email	
1. All building works are subject to compliance with the Building Ordinance (BO).	Noted with thanks.
2. Detailed comments under the BO on individual sites for private developments such as permissible plot ratio, site coverage, means of escape, emergency vehicular access, private streets, and/or access roads, open space, barrier free access and facilities,	Noted with thanks.

Departmental Comments	*Response*
compliance with the sustainable building design guidelines, etc. will be formulated at the building plan submission stage.	
3. Service lane should be provided in accordance with Building (Planning) Regulation (B(P)R) 28(1), if applicable. Such service lane should be excluded from site area for the purpose of plot ratio and site coverage calculations. B(P)R 23(2)(a) refers.	Noted with thanks.
4. GFA concessions for the proposed basement carpark would be considered subject to compliance with the relevant criteria under PNAP APP-2.	Noted with thanks.
Highways Department received on 30.06.2026 by email	
1. Please be advised that there is no comment on the application from the highway's maintenance point of view.	Noted with thanks.

SECTION 16 TOWN PLANNING APPLICATION

SUPPLEMENTARY PLANNING STATEMENT

Proposed Minor Relaxation of Building Height Restriction to Allow for One Storey of Basement for Carparking and Ancillary Plant Room for the Permitted House Development

At New Kowloon Inland Lot No. 754,
4 Cumberland Road, Kowloon Tong, Kowloon

REVISED IN JULY 2026

APPLICANTS	SHENG FANG & YANG JUAN
PLANNING AND LANDS CONSULTANT	DeSPACE (INTERNATIONAL) LIMITED
ARCHITECT	LOCUS ASSOCIATES LIMITED
AUTHORIZED PERSON AND STRUCTURAL ENGINEER	S.T. WONG AND PARTNERS LIMITED

EXECUTIVE SUMMARY

This Planning Statement is submitted to the Town Planning Board ("TPB") on behalf of the registered owners, SHENG FANG and YANG JUAN, in support of an application under Section 16 of the Town Planning Ordinance for planning permission for a minor relaxation of the building height restriction at No. 4 Cumberland Road, Kowloon Tong, Kowloon (the "Application Site").

The Application Site is zoned "Residential (Group C) 1" ("R(C)1") under the Approved Kowloon Tong Outline Zoning Plan No. S/K18/21, which is subject to a maximum plot ratio of 0.6 and a maximum building height of 3 storeys. The minor relaxation sought would allow the building height to increase from 3 storeys to 4 storeys inclusive of one basement level, facilitating the redevelopment on the Application Site as a house (the "Proposed Redevelopment"). The addition of a basement level is proposed to accommodate private car parking spaces and ancillary plant rooms below ground, thereby maximising at-grade landscaping provision and achieving a compatible building form above ground.

The application is well-supported in planning terms:

- The Proposed Redevelopment is consistent with the planning intention of the "R(C)1" zone;
- The Proposed Redevelopment will not result in perceptible change to the above-ground massing or bulk, thus fully compatible with the surroundings;
- The proposed basement is of a proportionate and justified scale, accommodating only car parking and essential plant rooms that are functionally necessary for the development;
- Sufficient design merits are provided and greening opportunities are maximised for the Proposed Redevelopment, in view of the relocation of ancillary facilities to the basement level;
- There are similar planning applications previously approved by TPB, and;
- No adverse impacts are anticipated for the Proposed Redevelopment in terms of landscape, environmental, and traffic.

In light of the foregoing, it is respectfully submitted to the Town Planning Board that planning permission should be granted.

行政摘要

本規劃綱要代表註冊業主SHENG FANG及YANG JUAN向城市規劃委員會提交，以支持根據《城市規劃條例》第16條就九龍九龍塘金巴倫道4號（「申請地點」）申請輕微放寬建築物高度限制的規劃申請。

根據已批准的九龍塘分區計劃大綱圖第S/K18/21號，申請地盤劃作「住宅（丙類）1」（「R(C)1」）地帶，受制於最高地積比率0.6及最高建築物高度3層的限制。是次申請的輕微放寬旨在將建築物高度由3層增加至4層（包括一層地庫），以便在申請地點上重建為一所屋宇（「擬議重建項目」）。增設地庫層的目的，在於將私家車停車位及輔助機房等設施移至地下，從而騰出地面層空間以提供充足綠化，並在地面以上呈現更符合周邊環境的建築形態。

本申請在規劃上理據充分，理由如下：

- 擬議重建項目符合「住宅（丙類）1」地帶的規劃意向；
- 擬議重建項目不會對地面以上的建築體量或規模造成明顯改變，因此與周邊環境完全相容；
- 擬議地庫規模適當合理，僅用於容納發展項目在功能上所必需的車位及基本機房設施；
- 鑑於附屬設施及泊車位已遷移至地庫層，擬議重建項目提供了充足的設計增益，並盡量增加綠化機會；
- 城規會已有核准類似規劃申請的先例；及
- 擬議重建項目在景觀、環境及交通方面均預計不會造成任何負面影響。

綜上所述，謹此恭請城市規劃委員會批准有關規劃申請。

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

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- ACCESSIBILITY

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- NON-STAUTORY PLANNING CONTEXT
- SIMILAR PLANNING APPROVALS

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- DEVELOPMENT SCHEME
- PLANNING AND DESIGN MERITS

05 PLANNING CONSIDERATIONS P.18

- IN LINE WITH THE PLANNING INTENTION OF THE “R(C)1” ZONE
- COMPATIBLE WITH THE SURROUNDING DEVELOPMENT
- APPROPRIATE DEVELOPMENT SCALE
- NO ADVERSE LANDSCAPE IMPACT
- NO ADVERSE ENVIRONMENTAL IMPACTS
- NO ADVERSE TRAFFIC IMPACT

06 CONCLUSION P.24

1. INTRODUCTION

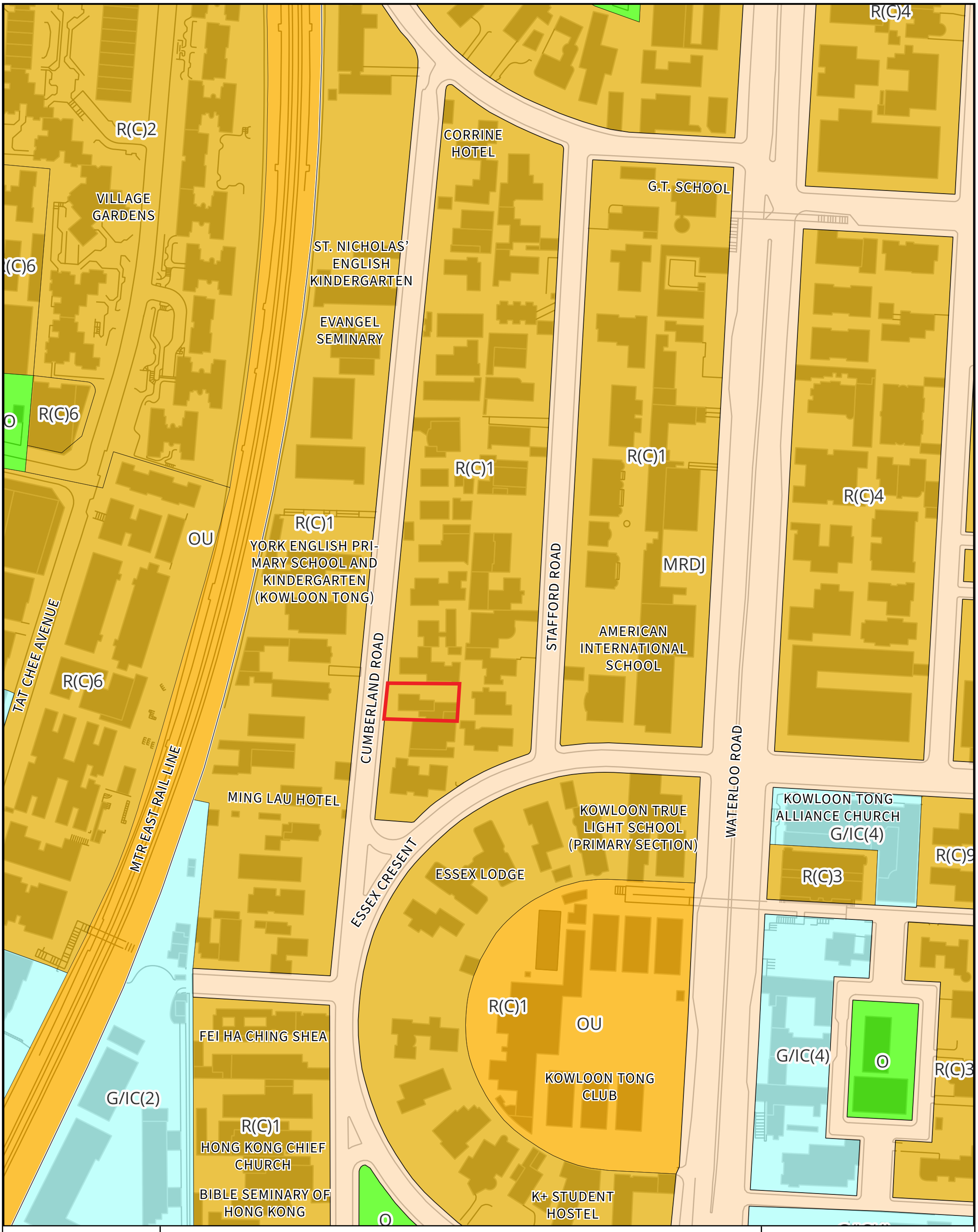
1.1 DeSPACE (International) Limited, on behalf of the registered owners, SHENG FANG and YANG JUAN, submits this Planning Statement to the Town Planning Board ("TPB") in support of an application under Section 16 of the Town Planning Ordinance for planning permission for a minor relaxation of the building height ("BH") restriction at No. 4 Cumberland Road, Kowloon Tong, Kowloon (the "Application Site"). Please refer to **Figure 1** for the Location Plan.

1.2 The Application Site is situated within the Kowloon Tong Garden Estate ("KTGE"), a prestigious low-rise, low-density residential neighbourhood. The site is currently occupied by a two-storey house.

1.3 According to the Approved Kowloon Tong Outline Zoning Plan ("OZP") No. S/K18/21, the Application Site is zoned "Residential (Group C) 1" ("R(C)1"), which provides for low to medium-rise, low-density residential developments subject to a maximum plot ratio ("PR") of 0.6 and a maximum BH of 3 storeys. The Notes of the OZP also illustrates that a minor relaxation of the BH restriction may be granted by the Board to allow for one basement storey for use as a car park and/or ancillary plant rooms, to be considered on individual merits having regard to the impact on existing trees and the distinctive character of the KTGE.

1.4 The application seeks permission for a minor relaxation of the BH restriction to allow for one storey of basement for car parking and ancillary plant rooms for the permitted house development, consolidating functional and building services requirements below ground so as to maximise at-grade landscaping and preserve the low-rise character of the KTGE.

1.5 The structure of this Planning Statement is as follows. Section 2 sets out the planning policy context. Section 3 reviews relevant approved precedents. Section 4 describes the Proposed Redevelopment and its design merits. Section 5 sets out the planning considerations in support of the application. Section 6 provides a conclusion.



DRAWING TITLE:
LOCATION PLAN

DRAWING NO.:
FIGURE 1

SCALE:
1:1000

LEGEND:

APPLICATION SITE

DATE:
MAY 2026

PREPARED BY:

DeSPACE (International) Limited

2. SITE CONTEXT

2.1 APPLICATION SITE AND SURROUNDING AREAS

2.1.1 The Application Site is located at 4 Cumberland Road, Kowloon Tong, comprising a site area of approximately 478.48 sq. m. (refer to **Figure 2 – Lot Index Plan**). The site is currently occupied by a house.

2.1.2 The Application Site falls within the Kowloon Tong Garden Estate ("KTGE"), a well-established low-rise, low-density residential neighbourhood of recognised character. The surrounding built environment is characterised by high-quality detached houses generally ranging from 1 to 4 storeys in height.

2.1.3 Whilst the immediate vicinity is predominantly residential in nature, the wider neighbourhood accommodates a range of compatible non-residential uses, including educational institutions, religious establishments and hotels.

2.2 LEASES

2.2.1 The Application Site forms part of New Kowloon Inland Lot No. 754 (**Figure 2** refers) and is held under a Government Lease. In common with other leases in the locality, the lot is subject to the following restrictions:

(a) the lessee shall keep and maintain on the lot a messuage or dwelling house throughout the entire term of the lease;
(b) rate and range clause;
(c) offensive trade clause; and
(d) the lessee shall not erect any additional messuage or dwelling house on the lot without the prior written consent of the Director of Lands.

2.2.2 Should the subject Section 16 application be approved, the owners will be required to apply separately to the Lands Department for a consent under lease for the Proposed Redevelopment or a lease modification to implement the proposal.

DRAWING TITLE: LOT INDEX PLAN	**LEGEND:** APPLICATION SITE NON-BUILDING AREA (“NBA”) AS SHOWN ON THE KOWLOON TONG OUTLINE DEVELOPMENT PLAN (INDICATIVE ONLY)	**DATE:** MAY 2026
DRAWING NO.: FIGURE 2		**PREPARED BY:** DeSPACE (International) Limited
SCALE: 1:500		

2. SITE CONTEXT

2.3 ACCESSIBILITY

2.3.1 The Application Site benefits from direct vehicular access via an existing ingress/egress onto Cumberland Road, which functions as a local distributor within the KTGE road network and connects to key arterial routes including Waterloo Road. The site is well served by a range of public transport modes: Kowloon Tong MTR Station (East Rail and Kwun Tong Lines) is located within approximately 700 metres of the site, whilst bus and minibus stops on Waterloo Road and Tat Chee Avenue are accessible within 300 to 400 metres, providing convenient connectivity to the wider metropolitan area.

3. TOWN PLANNING CONTEXT

3.1 STATUTORY PLANNING CONTEXT

3.1.1 According to the Approved Kowloon Tong Outline Zoning Plan (OZP) No. S/K18/21, the Application Site is zoned "Residential (Group C) 1" ("R(C)1", **Figure 1** refers). As stipulated in the Notes of the OZP, 'House' use is under Column 1, for which a planning permission is not required. The zone is subject to a maximum plot ratio ("PR") of 0.6 and a BH of 3 storeys. Thus, a planning permission is required for minor relaxation of building height restriction for constructing a car park and ancillary plant rooms at basement level.

3.1.2 The planning intention of the "R(C)1" zone is to promote low-rise, low-density residential development, with commercial uses serving the local residential community permissible on application to TPB. In recognition of the need for design flexibility, the Notes of the OZP provide that minor relaxation of the building height restriction, specifically to accommodate one storey of basement constructed or intended for use as a car park and/or ancillary plant room, may be considered by TPB on application, having regard to the individual planning and design merits of a development or redevelopment proposal. It is further noted that any basement construction shall not cause adverse impacts to existing trees or compromise the distinctive garden estate character of the area.

3.2 NON-STATUTORY PLANNING CONTEXT

3.2.1 In addition to the statutory framework, the Application Site is subject to the guidance set out in the Draft Kowloon Tong Outline Development Plan ("ODP") No. D/K18/1A. The ODP designates a Non-Building Area ("NBA") of 6 metres in width along the site boundary abutting Cumberland Road. This setback requirement serves to enhance the local streetscape, safeguard the prevailing scale and spatial disposition of development within the KTGE, and promote air and visual permeability through the neighbourhood. Compliance with the NBA requirement is a standard material consideration for TPB in its assessment of applications for building height relaxation within the zone.

3. TOWN PLANNING CONTEXT

3.3 SIMILAR PLANNING APPROVALS

3.3.1 There is a well-established precedent of the Board granting planning permission for minor relaxation of the building height restriction to accommodate basement development within the "R(C)1" zone. A total of 4 such applications have been approved over the past 10 years, as summarised in **Table 1** below.

3.3.2 The approved applications cited were granted on the basis of demonstrated planning and design merits. Common grounds for approval included the provision of on-site landscaping and greenery along street frontages, increased at-grade greening, innovative architectural design features such as stepped terraces with integrated planting, and the absence of rooftop structures. These measures collectively contributed to an enhanced streetscape and a built form sympathetic to the garden estate setting of the KTGE. The Proposed Redevelopment is therefore consistent with the planning and design rationale underlying the TPB's decisions on comparable applications, and approval of the current application would be in line with TPB's decision on similar cases.

TABLE 1 – SIMILAR APPROVED APPLICATIONS FOR MINOR RELAXATION OF BUILDING HEIGHT RESTRICTION FOR BASEMENTS WITHIN "R(C)1" ZONE ON THE OZP IN THE PAST 15 YEARS

Case No.	A/K18/350	A/K18/349	A/K18/342	A/K18/331	A/K18/326
Approval Date	05/09/2025	05/09/2025	04/03/2022	13/09/2019	03/08/2018
Address	3 Lincoln Road	5 Lincoln Road	14 Kent Road	7 Lincoln Road	147 Waterloo Road
Site Area	945.28 sq. m.	948.25 sq. m.	998.8 sq. m.	724.92 sq. m.	822.966 sq. m.
Gross Floor Area (GFA)	540.35 sq. m.	540.41 sq. m.	599 sq. m.	434.95 sq. m.	564.726 sq. m.
Floor Area for Basement	689.165 sq. m.	689.211 sq. m.	640.5 sq. m.	294 sq. m.	626.855 sq. m.
% of Basement Floor Area over Site Area	73%	73%	64%	41%	76%
Plot Ratio (PR)	0.6	0.6	0.6	0.6	0.6862
Building Height (BH)	11.5m	11.5m	11.5m	13m	11.9m
Site Coverage (SC)	About 24.24%	About 24.03%	About 23.7%	Not more than 75%	About 36.67%
Car Parking	3 private car parking spaces and 1 accessible visitor car parking space in B/F	3 private car parking spaces and 1 accessible visitor car parking space in B/F	3 private car parking spaces in B/F	2 private car parking spaces in B/F and 1 visitor car parking space on G/F	2 private car parking spaces and 1 accessible visitor car parking space in B/F
Loading/Unloading ("L/UL") Facilities	1 LGV space on G/F	1 LGV space on G/F	1 LGV space in B/F	1 temporary LGV space on G/F	1 temporary LGV space on ramp to car park on G/F
Greening Ratio	20%	20%	18.20%	15%	N/A
Planning and Design Merits Considered by TPB	Building set back by 6m; stepped terraced design; overall 20% greenery at grade; no plant rooms provided on roof level		Building set back of 12.24m; decorative panel or lighting features on frontage; maximizing greenery coverage to 18.2%; preservation of existing tree	Building set back of 6m; efforts in maximising greening opportunities; inexcessive basement size	Preservation of existing tree; no plant rooms provided on ground and roof levels

4. THE PROPOSED REDEVELOPMENT

4.1 DEVELOPMENT SCHEME

4.1.1 The applicant seeks planning permission for a minor relaxation of the building height restriction from 3 storeys to 4 storeys (with additional 1 storey for 1 basement level) to facilitate the comprehensive redevelopment of the site as a single quality house. The Proposed Redevelopment will comprise 3 domestic storeys above ground situated over a fully functional basement floor, resulting in a built form that remains modest in scale and sympathetic to the prevailing character of the KTGE.

4.1.2 The proposed basement level is designed to accommodate essential ancillary facilities and plant rooms (refer to **Figure 3** for the Excavation Plan). By consolidating these functional elements below ground, the proposal maximises the availability of at-grade land for high-quality soft and hard landscaping, thereby contributing positively to the amenity and visual character of both the site and the wider streetscape. The key development parameters of the Proposed Redevelopment are summarized in the **Table 2** below, while the Proposed Scheme is attached in **Appendix 1** with an OZP-compliant Scheme is attached in **Appendix 2** for comparison:

DRAWING TITLE: EXCAVATION PLAN	**LEGEND:** APPLICATION SITE EXCAVATION AREA (AREA: ABOUT 362 sq.m.; DEPTH: ABOUT 5.40 m)	**DATE:** JULY 2026
DRAWING NO.: FIGURE 3		**PREPARED BY:** DeSPACE (International) Limited
SCALE: 1:500		

4. THE PROPOSED REDEVELOPMENT

TABLE 2 – KEY DEVELOPMENT PARAMETERS

Development Parameters	OZP-compliant Scheme	Proposed Scheme	Compliancy
Site Area	About 478.48 sq. m. (or 5,150.47 sq. ft.)		N/A
Gross Floor Area ("GFA")	About 287.0 sq. m.	About 287.0 sq. m. (1)	B(P)R complied
Plot Ratio ("PR")	About 0.60	About 0.60	OZP Complied
Building Height ("BH")	12m (25.55mPD at roof level)	12m (25.55mPD at roof level)	JPN5 complied
No. of Storeys	3 storeys	**4 storeys (including 1 level of basement)**	Minor relaxation to be sought
Site Coverage ("SC")	About 41.30%	About 28.19%	Within the range to cases in **Table 1**
Basement Area	N/A	**362 sq.m. (about 75.6% of site area)**	Within the range to cases in **Table 1**
Greening Ratio	About 11.51%	**About 27.77%**	Within the range to cases in **Table 1**
Car Parking	2 Private Car Parking Spaces (including 1 Accessible Visitor Car Parking Space)	**3 Private Car Parking Spaces (including 1 Accessible Visitor Car Parking Space)**	Within an acceptable range in relation to site area compared to cases in **Table 1**
Loading/ Unloading ("L/UL") Facilities	N/A	**1 Private Car, Van-type Light Goods Vehicle ("LGV") Space**	Within an acceptable range in relation to site area compared to cases in **Table 1**

(1) According to the Practice Note for Authorised Persons, Registered Structural Engineers and Registered Geotechnical Engineers (PNAP) No. APP-2, the GFA of the proposed basement private car park, ancillary plant rooms, and access staircases can be disregarded under the Buildings Ordinance.

4. THE PROPOSED REDEVELOPMENT

4.2 PLANNING AND DESIGN MERITS

4.2.1 The proposed minor relaxation of the building height restriction is underpinned by a range of substantive planning and design merits that collectively demonstrate a positive contribution to the neighbourhood. To contextualise these merits, it is instructive to consider the Proposed Redevelopment against an OZP-compliant scheme (**Appendix 2** refers) that does not incorporate a basement.

Under such a compliant scheme, ancillary facilities, including water tanks and plant rooms, would need to be relocated to the ground and roof levels. This would result in the greenery ratio falling below 20% and lead to increased intrusion of plant rooms at the roof level. The Proposed Redevelopment, by contrast, achieves a materially superior planning and design outcome in every measurable respect, as set out below.

4.2.2 Stepped Height Design

The Proposed Redevelopment adopts a stepped height massing strategy in which the upper floors are progressively set back relative to the floors below. This articulation of building form reduces the perceived visual bulk of the development as experienced from pedestrian level along Cumberland Road, and introduces a dynamic, human-scaled profile that is more sensitive to the garden estate character of the KTGE than a uniform box-form building of equivalent floor area.

4.2.3 Building Setback in Compliance with the Kowloon Tong ODP

A 6-metre building setback from Cumberland Road is maintained in full compliance with the non-building area requirement stipulated under the ODP This generous setback preserves the open, verdant character of the street frontage and ensures that the Proposed Redevelopment reinforces rather than erodes the defining spatial qualities of the KTGE. The setback zone is proposed to be soft-landscaped with trees, further contributing to the green frontage as experienced from the public realm.

Furthermore, the building setback is further increased to around 7.8 meters on upper floors, enabled by the stepped height design, thereby enhancing the spacious and landscaped character of the street frontage.

4. THE PROPOSED REDEVELOPMENT

4.2.4 Enhanced Greening Ratio

The Proposed Redevelopment achieves a greenery ratio of about 27.77%, typically expected by TPB for private developments in KTGE. This is made possible precisely because of the basement, which confines the building footprint to a compact area below grade and frees up the remaining at-grade areas and rooftop for generous soft landscaping. An OZP-compliant scheme without a basement would be less able to achieve a desirable level of greenery, as the building footprint at grade would occupy a proportionally greater share of the site area due to the necessary provision of plant rooms. The provision of a basement therefore directly enables a higher standard of greening that would otherwise be unattainable.

4.2.5 Relocation of Ancillary Facilities to Basement

The proposed basement accommodates all private car parking spaces and ancillary plant rooms below ground. By consolidating these facilities within the basement, the Proposed Redevelopment eliminates the visual clutter that would otherwise result from the placement of bulky plant and equipment at ground and roof level, as would be required under an OZP-compliant scheme. The outcome is a clean, unencumbered roofscape that enhances the local townscape when viewed from surrounding properties and elevated vantage points, and a building form that presents a more refined and carefully considered appearance in keeping with the residential character of the KTGE.

5. PLANNING CONSIDERATIONS

5.1 IN LINE WITH THE PLANNING INTENTION OF THE "R(C)1" ZONE

5.1.1 The Proposed Redevelopment is fully consistent with the planning intention of the "R(C)1" zone, which seeks to facilitate low-rise, low-density quality residential development within an established garden estate setting. The proposal retains a domestic house use as the principal use of the site, complies with the statutory maximum PR of 0.6, and does not exceed 3 storeys above ground. The minor relaxation sought relates solely to the accommodation of one storey of basement for car parking and ancillary plant room purposes, which is a provision expressly contemplated by the Notes of the OZP.

5.1.2 Of particular significance is the fact that TPB has previously approved a series of planning applications for minor relaxation of the building height restriction on materially identical grounds, namely to allow for one storey of basement for car parking spaces and/or ancillary plant room use within the same "R(C)1" zone of the Kowloon Tong OZP. As summarised in **Table 1** above, these approved precedents reflect a consistent recognition by TPB that such relaxations afford necessary design flexibility without increasing the domestic GFA, and that they are capable of being accommodated without prejudice to the garden estate character of the KTGE.

5.1.3 The current proposal is advanced on precisely the same planning rationale and is directly analogous to the aforementioned approved cases in all material respects. Having regard to the established decision-making pattern of TPB, it is respectfully submitted that there are no planning grounds to depart from the approach consistently taken in comparable applications, and that planning permission should similarly be granted in the present case.

5. PLANNING CONSIDERATIONS

5.2 COMPATIBLE WITH THE SURROUNDING DEVELOPMENT

5.2.1 As the proposed minor relaxation involves only the addition of a basement floor below existing ground level, it will not result in any perceptible change to the massing or bulk of the development above ground. The Proposed Redevelopment will present as a 3-storey domestic house from the public realm, which is fully in keeping with the prevailing built form of the surrounding neighbourhood, where buildings are generally 1 to 3 storeys in height.

5.2.2 Beyond the scale of the development, the compatibility of the Proposed Redevelopment with its surroundings is actively reinforced through a series of considered design measures. A 6-metre building setback from Cumberland Road is strictly observed in accordance with the NBA requirement under the Kowloon Tong ODP, preserving the open and verdant character of the street frontage that is so integral to the garden estate setting of the KTGE. The adoption of a stepped height strategy, whereby the upper floors are progressively set back relative to the floors below, further serves to reduce the perceived visual bulk of the development as experienced from pedestrian level and ensures that the building profile reads as slender and well-proportioned within its context.

5.2.3 At grade, generous soft landscaping incorporating trees, shrubs, and ground cover planting is proposed, maintaining the continuity of the mature green streetscape character that defines the KTGE. Taken together, these measures demonstrate that the Proposed Redevelopment is not merely compatible with its surroundings in a passive sense, but makes a positive and active contribution to the quality and character of the neighbourhood.

5. PLANNING CONSIDERATIONS

5.3 APPROPRIATE DEVELOPMENT SCALE

5.3.1 The proposed basement is of a proportionate and justified scale, sized exclusively to accommodate uses that are functionally necessary for the Proposed Redevelopment. With a basement footprint of *about 75.6%* of the site area, the extent of the basement is directly dictated by two categories of operational requirement: HKPSG-compliant car parking provision comprising 3 private spaces with 1 accessible visitor space, together with the circulation and manoeuvring areas that such provision requires; and essential building services plant including water tanks, mechanical and electrical facilities. No portion of the basement is devoted to any discretionary or extraneous use.

5.3.2 Given the constrained site area, basement provision is the only viable means of satisfying both the parking requirement and the need to consolidate building services without consuming at-grade land that would otherwise be available for landscaping. An OZP-compliant scheme without a basement would be less effective in accommodating parking at grade in line with HKPSG, would require bulky plant rooms to be distributed across the ground and roof levels, and would result in a reduced level of greening generally demonstrated in similar developments. By accommodating these functional elements below ground, the Proposed Redevelopment achieves a materially superior planning outcome in every measurable respect.

5.3.3 Since the basement floor area for car parking and ancillary plant rooms is disregarded under PNAP APP-2, both the plot ratio of 0.6 and site coverage of *about 28.19%* are strictly observed, with no increase in above-ground bulk resulting from the basement. Assessed against the approved precedents in **Table 1**, the proposed basement-to-site area ratio falls squarely within the established range of 41% to 76%, with the two most recently approved cases at 3 and 5 Lincoln Road both achieving 73% on sites considerably larger than the Application Site. The relatively high ratio in the present case is a direct consequence of the small site area rather than any attempt to maximise basement extent beyond what is functionally necessary. Therefore, in terms of site-specific context, the proposed basement is consistent with comparable approved cases and is considered to be of an appropriate, justified and not excessive scale in the circumstances of this application.

5. PLANNING CONSIDERATIONS

5.4 NO ADVERSE LANDSCAPE IMPACT

5.4.1 The Application Site is situated within an urban landscape context characterised predominantly by low-rise residential buildings. The landscape character of the area is defined by the mature greenery and generous setbacks typical of the KTGE. The Proposed Redevelopment is considered not incompatible with this landscape setting and is unlikely to induce any significant adverse visual or landscape impact.

5.4.2 Compared to the OZP-compliant Scheme, an increase of greenery ratio to *about 16.27%* is proposed as an integral component of the Proposed Redevelopment. A Landscape Proposal attached as **Appendix 3** demonstrates that landscaping, including planters and ground cover planting, will be provided at grade along the site boundary, as well as on the setback podiums. The Proposed Redevelopment also ensures that the provision of basement facilities does not compromise meaningful at-grade greening by allowing sufficient soil depth proposed in PNAP APP-152. These measures serve to soften the building mass, enhance the visual amenity of the development, and reinforce the green and open character of the surrounding streetscape.

5. PLANNING CONSIDERATIONS

5.5 NO ADVERSE ENVIRONMENTAL IMPACTS

5.5.1 Noise

The Application Site is not subject to any known significant noise source. Adverse noise impacts on the Proposed Redevelopment are not anticipated. Nonetheless, the planning and design of the development will comply with the relevant noise planning standards and guidelines under the HKPSG to ensure that no noise nuisance will arise.

5.5.2 Air Quality

There is no active industrial chimney or major air pollution source within 200 metres of the Application Site. The Proposed Redevelopment incorporates a basement car park, which will be designed and operated in compliance with the requirements of ProPECC PN 2/96 — Control of Air Pollution in Car Parks and other applicable guidelines. Sufficient buffer distances from vehicular emission sources as required under the HKPSG will be maintained. Adverse air quality impacts are not anticipated.

5.5.3 Sewerage and Drainage

Given the modest scale of the Proposed Redevelopment as a single domestic house, adverse sewerage or drainage impacts on the surrounding areas are not anticipated. Sewage and surface water drainage will be properly connected to the existing public drainage infrastructure and shall be handled in the General Building Plans submission stage.

5.5.4 In summary, the proposed car parking and plant room uses at basement level are demonstrated to have insignificant environmental impacts on the surrounding area. No material adverse impacts on drainage or the local environment are expected to arise from the Proposed Redevelopment.

5. PLANNING CONSIDERATIONS

5.6 NO ADVERSE TRAFFIC IMPACT

5.6.1 The Application Site currently benefits from an existing vehicular ingress/egress onto Cumberland Road, although this access arrangement is not formally stipulated in the Government Lease. The Proposed Redevelopment, by incorporating a purpose-designed basement car park with 2 private spaces and 1 accessible visitor space, will provide a formalised and well-managed parking arrangement that is expected to represent an improvement over the existing situation in terms of on-site vehicle accommodation. It should be also noted that the number of parking spaces provided in the Proposed Scheme, which is in accordance with the HKPSG, would not be possible in the OZP-compliant scheme due to a constrained site area.

5.6.2 Due to site constraints, the provision of 1 L/UL space for private cars, van-type LGVs is the only viable option in the Proposed Scheme. The Applicant would ensure that all L/UL activities for the Proposed Redevelopment will only take place within the Site, and that no larger LGVs can conduct L/UL activities within the Site or obstruct the public footpath and carriageway on Cumberland Road.

5.6.3 The Proposed Redevelopment constitutes a single-family domestic house, and trip generation associated with the development will therefore remain minimal. No adverse impact on the capacity or operation of the surrounding road network is anticipated. Therefore, the proposed minor relaxation of building height is not expected to give rise to any adverse traffic impact on the surrounding road network.

6. CONCLUSION

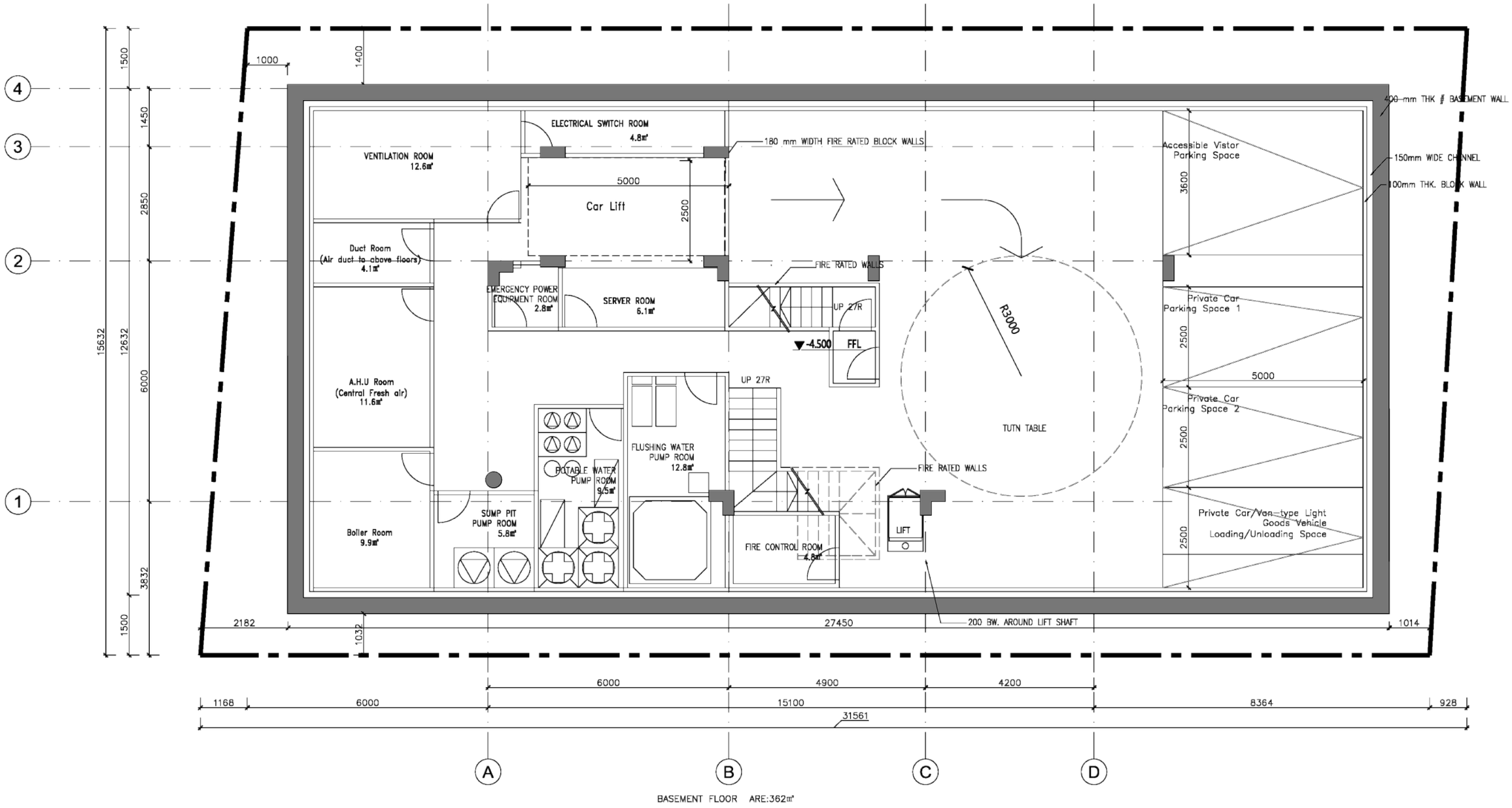
6.1 This application seeks a minor relaxation of the building height restriction from 3 storeys to 4 storeys (inclusive of one basement level) to facilitate the comprehensive redevelopment of the Application Site as a single quality domestic house at 4 Cumberland Road, Kowloon Tong.

6.2 The Proposed Redevelopment is fully justified on the following grounds:

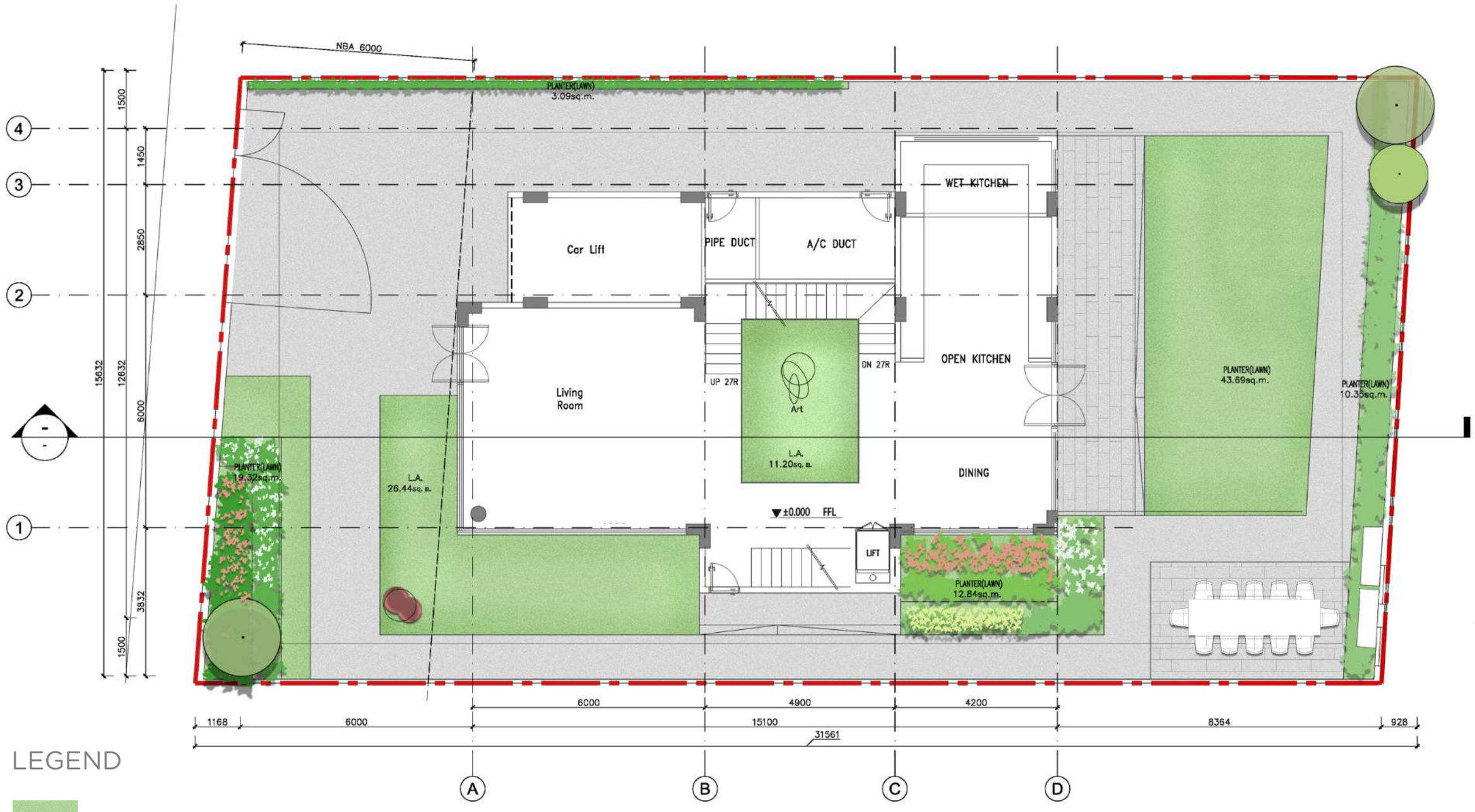
a) The Proposed Redevelopment is consistent with the planning intention of the "R(C)1" zone;
b) The Proposed Redevelopment will not result in perceptible change to the above-ground massing or bulk, thus fully compatible with the surroundings;
c) The proposed basement is of a proportionate and justified scale, accommodating only car parking and essential plant rooms that are functionally necessary for the development;
d) Sufficient design merits are provided and greening opportunities are maximised for the Proposed Redevelopment, in view of the relocation of ancillary facilities to the basement level, and;
e) No adverse impacts are anticipated for the Proposed Redevelopment in terms of landscape, environmental, and traffic.

6.3 In light of the foregoing, it is respectfully submitted that the application is well-founded in planning terms and that planning permission should be granted by TPB accordingly.

APPENDIX 1
PROPOSED SCHEME

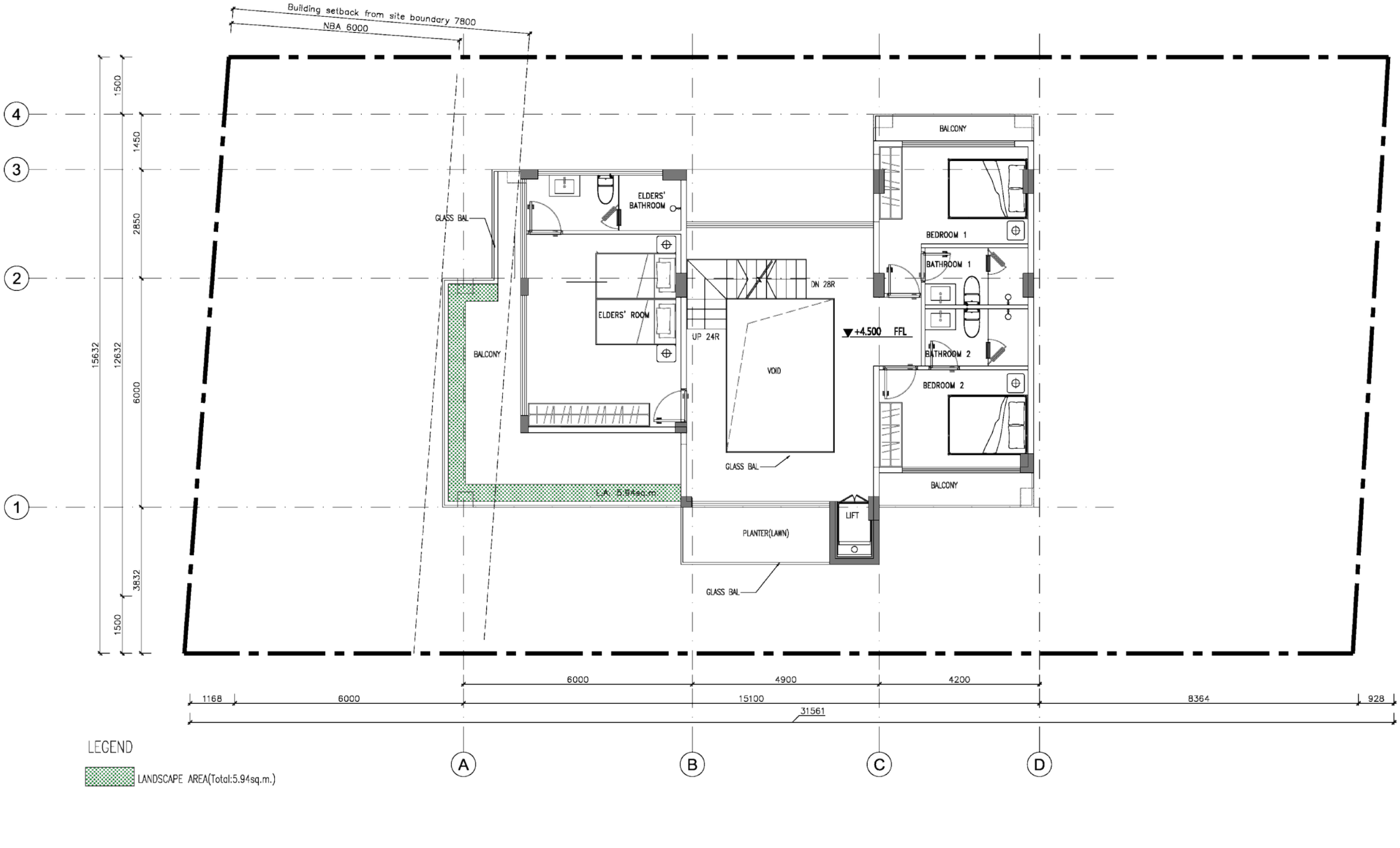


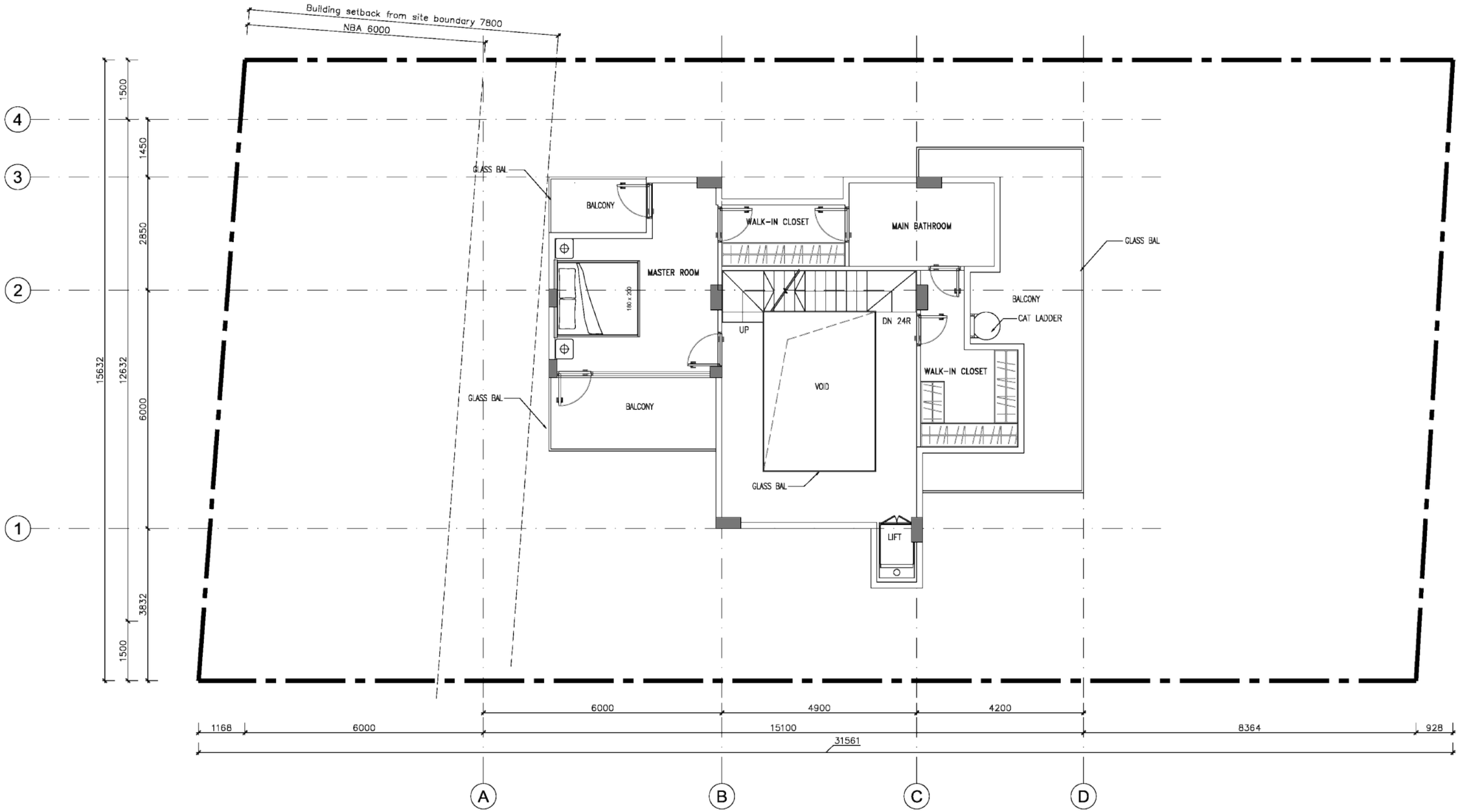
BASEMENT FLOOR ARE:362㎡



LEGEND

LANDSCAPE AREA (Total Area:126.93sq.m.)


Building setback from site boundary 7800
NBA 6000
BALCONY
BEDROOM 1
BATHROOM 1
BATHROOM 2
BEDROOM 2
BALCONY
ELDERS' BATHROOM
GLASS BAL
ELDERS' ROOM
DN 28R
UP 24R
VOID
+4.500 FFL
GLASS BAL
BALCONY
L.A. 5.94sq.m
PLANTER(LAWN)
LIFT
GLASS BAL
1500
1450
2850
6000
3832
1500
15632
12632
6000
4900
4200
1168
6000
15100
8364
928
31561
LEGEND
LANDSCAPE AREA(Total:5.94sq.m.)
A
B
C
D
1
2
3
4


Building setback from site boundary 7800
NBA 6000
GLASS BAL
BALCONY
WALK-IN CLOSET
MAIN BATHROOM
MASTER ROOM
180 x 200
UP
DN 24R
VOID
BALCONY
CAT LADDER
WALK-IN CLOSET
GLASS BAL
BALCONY
GLASS BAL
LIFT
1500
1450
2850
6000
15632
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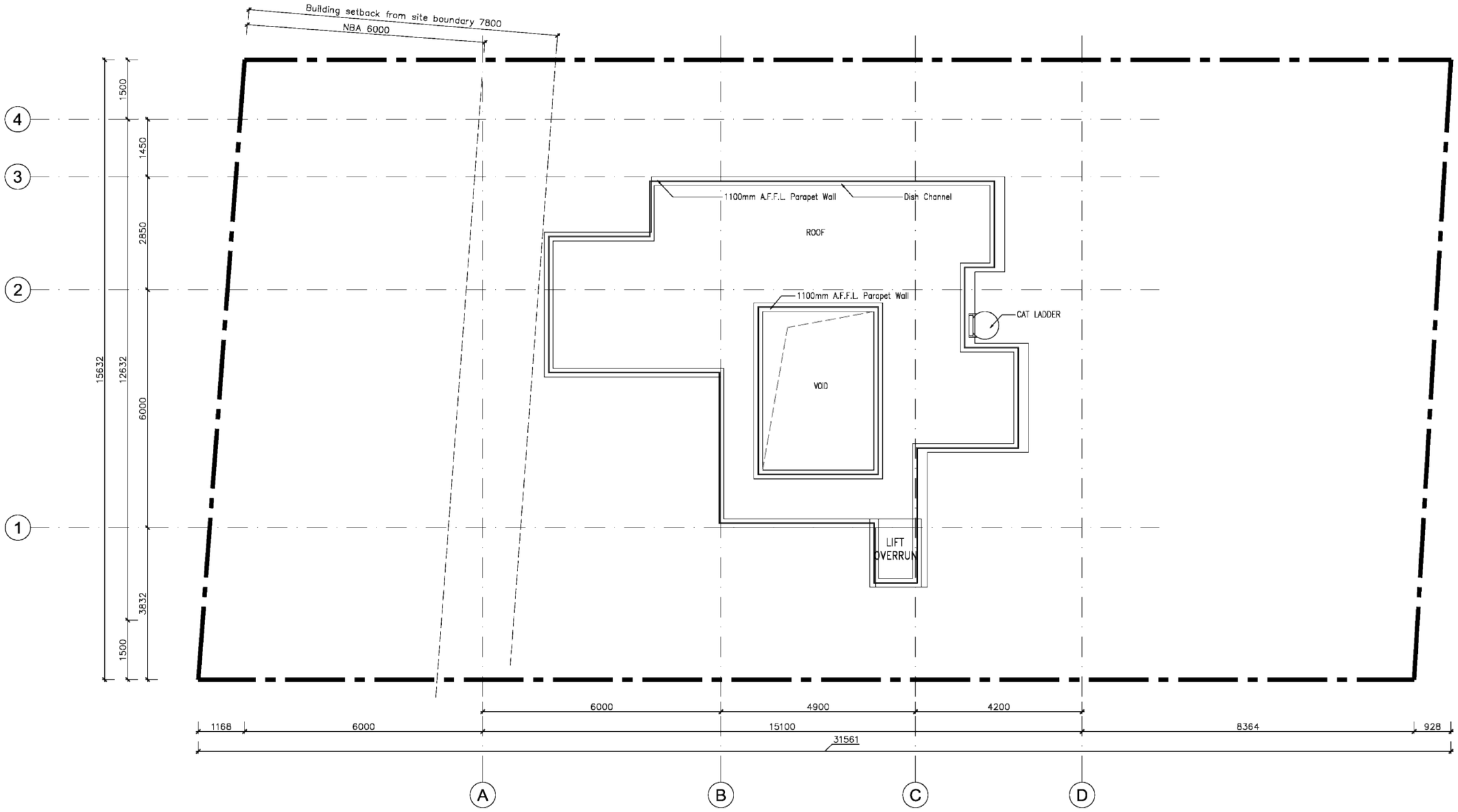
Building setback from site boundary 7800
NBA 6000
1100mm A.F.F.L. Parapet Wall
Dish Channel
ROOF
1100mm A.F.F.L. Parapet Wall
CAT LADDER
VOID
LIFT OVERRUN
1500
1450
2850
15632
12632
6000
3832
1500
6000
4900
4200
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6000
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8364
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31561
4
3
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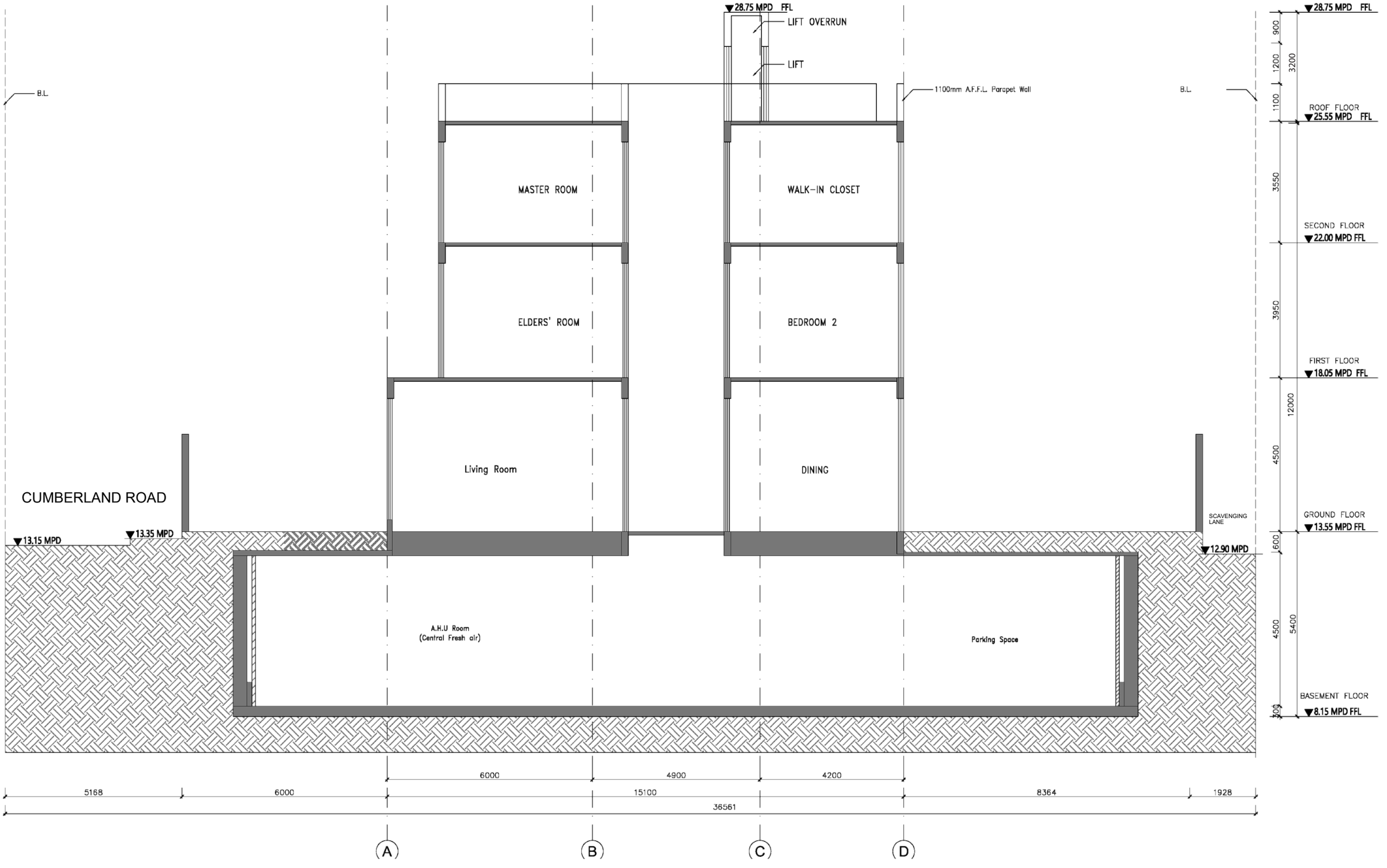
A
B
C
D


▼28.75 MPD FFL
LIFT OVERRUN
LIFT
1100mm A.F.F.L. Parapet Wall
B.L.
MASTER ROOM
WALK-IN CLOSET
ELDERS' ROOM
BEDROOM 2
Living Room
DINING
CUMBERLAND ROAD
▼13.15 MPD
▼13.35 MPD
SCAVENGING LANE
▼12.90 MPD
A.H.U Room
(Central Fresh air)
Parking Space
6000
4900
4200
5168
6000
15100
8364
1928
36561
A
B
C
D
900
1200
1100
3200
ROOF FLOOR
▼25.55 MPD FFL
3550
SECOND FLOOR
▼22.00 MPD FFL
3950
FIRST FLOOR
▼18.05 MPD FFL
12000
4500
GROUND FLOOR
▼13.55 MPD FFL
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4500
5400
300
BASEMENT FLOOR
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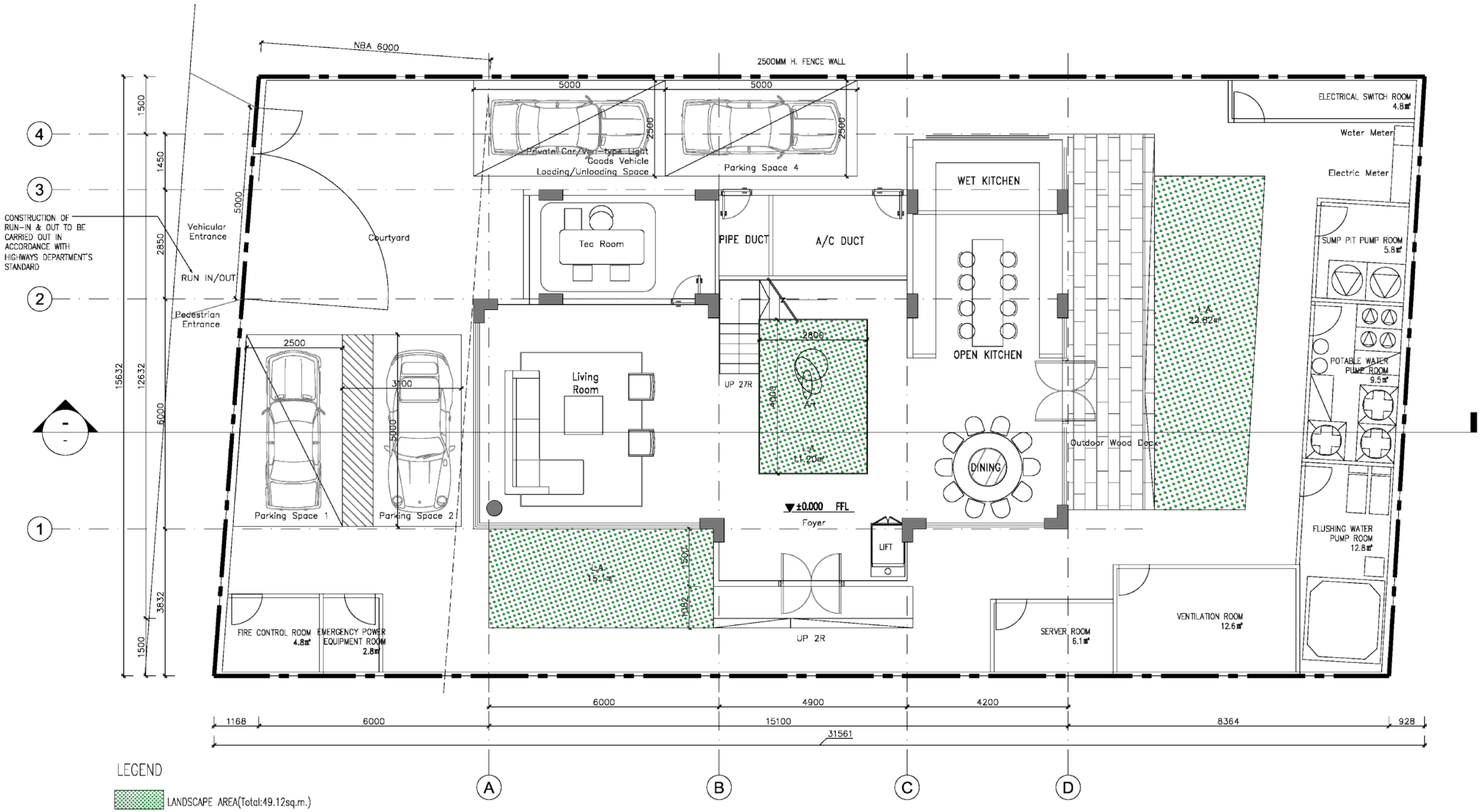
APPENDIX 2
OZP-COMPLIANT SCHEME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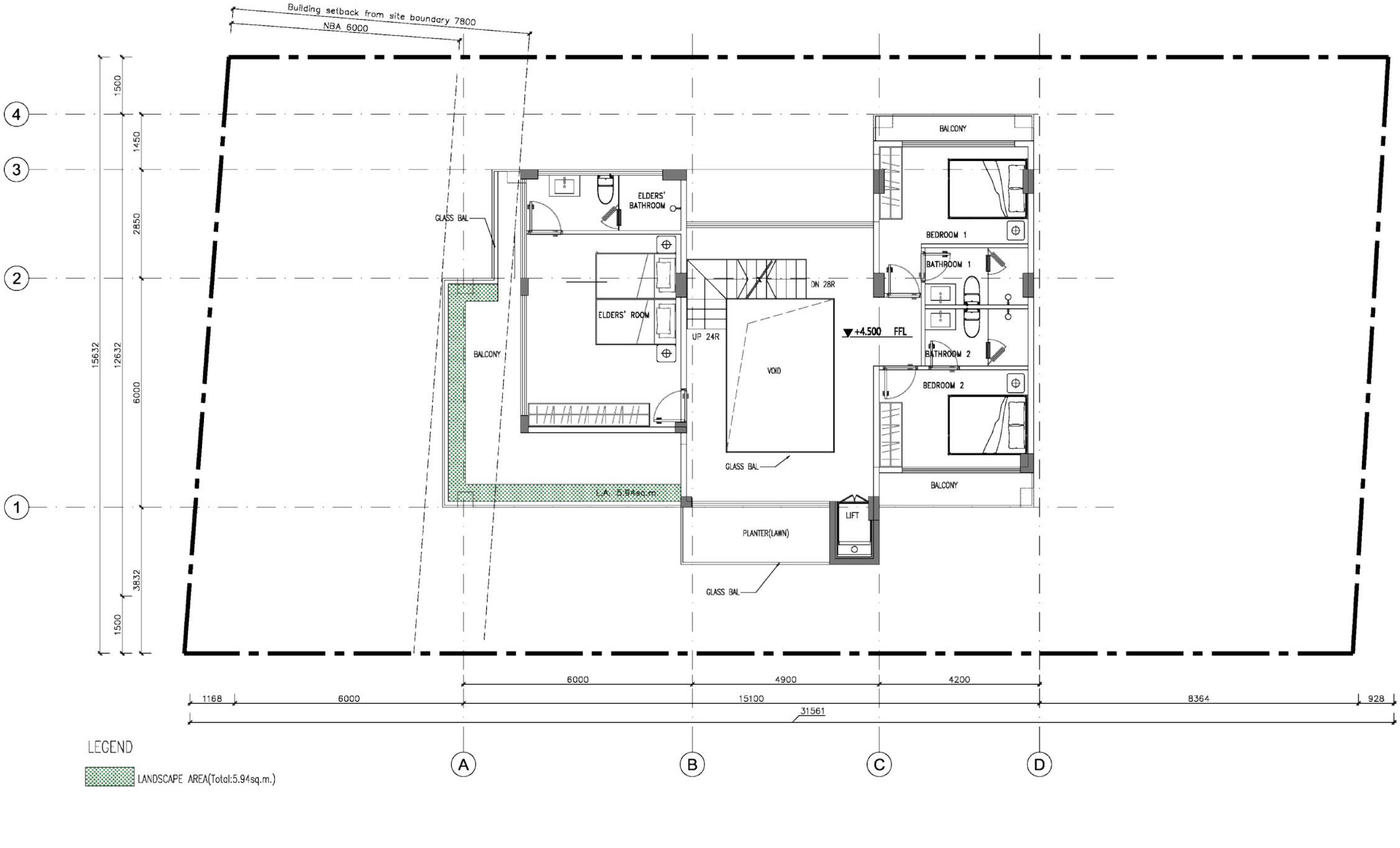
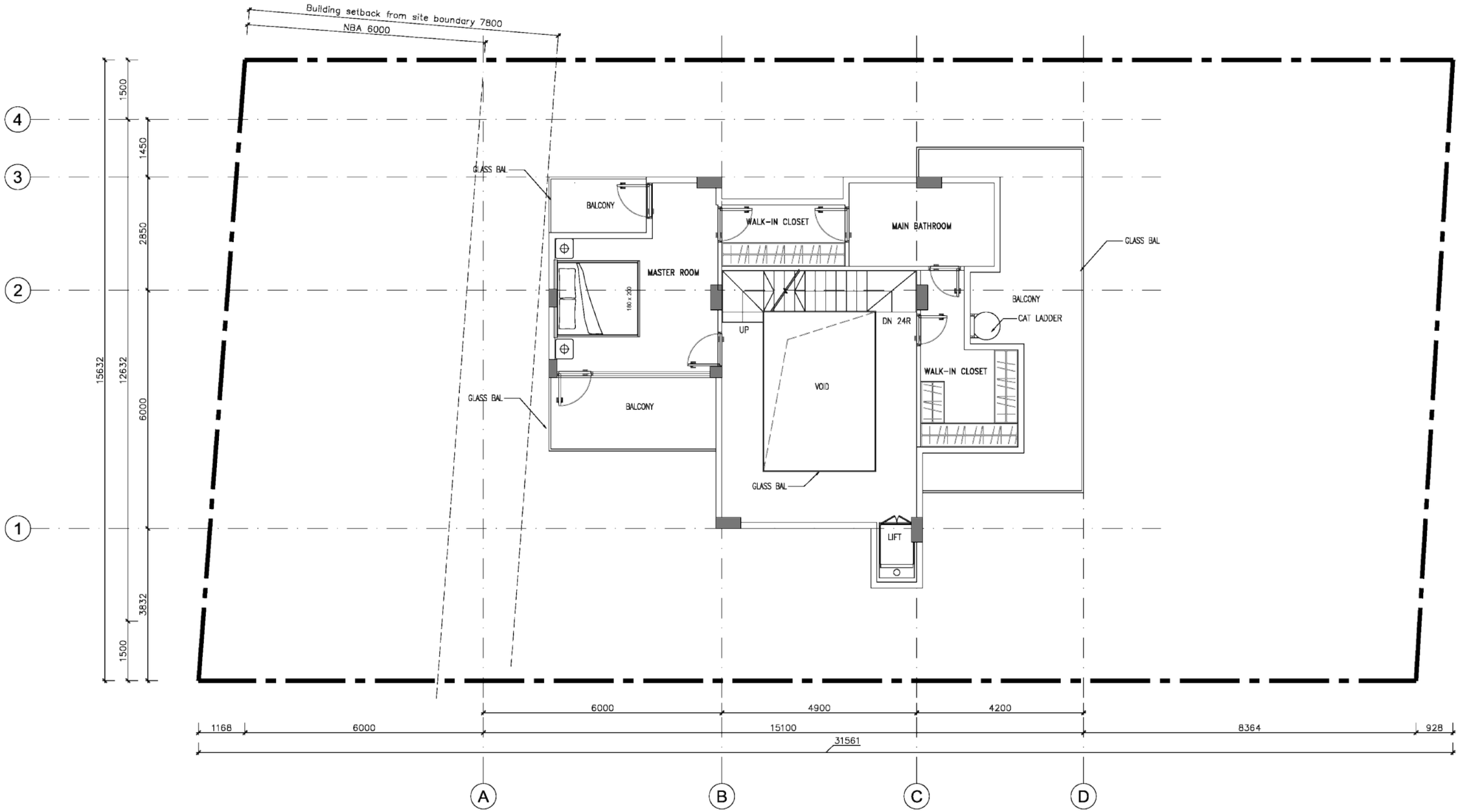
2500MM H. FENCE WALL
5000
5000
2500
2500
Private Car/Van-type Light Goods Vehicle Loading/Unloading Space
Parking Space 4
ELECTRICAL SWITCH ROOM 4.8㎡
Water Meter
Electric Meter
WET KITCHEN
CONSTRUCTION OF RUN-IN & OUT TO BE CARRIED OUT IN ACCORDANCE WITH HIGHWAYS DEPARTMENT'S STANDARD
Vehicular Entrance
Courtyard
RUN IN/OUT
Pedestrian Entrance
Tea Room
PIPE DUCT
A/C DUCT
SUMP PIT PUMP ROOM 5.8㎡
L.A. 22.62㎡
OPEN KITCHEN
POTABLE WATER PUMP ROOM 9.5㎡
2500
3100
Living Room
UP 27R
2800
L.A. 11.20㎡
DINING
Outdoor Wood Deck
Parking Space 1
Parking Space 2
±0.000 FFL
Foyer
LIFT
L.A. 15.14㎡
FLUSHING WATER PUMP ROOM 12.8㎡
FIRE CONTROL ROOM 4.8㎡
EMERGENCY POWER EQUIPMENT ROOM 2.8㎡
UP 2R
SERVER ROOM 6.1㎡
VENTILATION ROOM 12.6㎡
1500
1450
2850
5000
6000
15632
12632
3832
1500
6000
4900
4200
1168
6000
15100
8364
928
31561
A
B
C
D
1
2
3
4
LEGEND
LANDSCAPE AREA(Total:49.12sq.m.)


Building setback from site boundary 7800
NBA 6000
BALCONY
BEDROOM 1
BATHROOM 1
BATHROOM 2
BEDROOM 2
BALCONY
ELDERS' BATHROOM
GLASS BAL
ELDERS' ROOM
DN 28R
UP 24R
+4.500 FFL
VOID
GLASS BAL
BALCONY
L.A. 5.94sq.m
LIFT
PLANTER(LAWN)
GLASS BAL
1500
1450
2850
6000
3832
1500
15632
12632
6000
4900
4200
1168
6000
15100
8364
928
31561
A
B
C
D
1
2
3
4
LEGEND
LANDSCAPE AREA(Total:5.94sq.m.)


Building setback from site boundary 7800
NBA 6000
GLASS BAL
BALCONY
WALK-IN CLOSET
MAIN BATHROOM
MASTER ROOM
180 x 200
UP
DN 24R
VOID
BALCONY
CAT LADDER
WALK-IN CLOSET
GLASS BAL
BALCONY
GLASS BAL
GLASS BAL
LIFT
1500
1450
2850
6000
15632
12632
3832
1500
6000
4900
4200
1168
6000
15100
8364
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31561
4
3
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1
A
B
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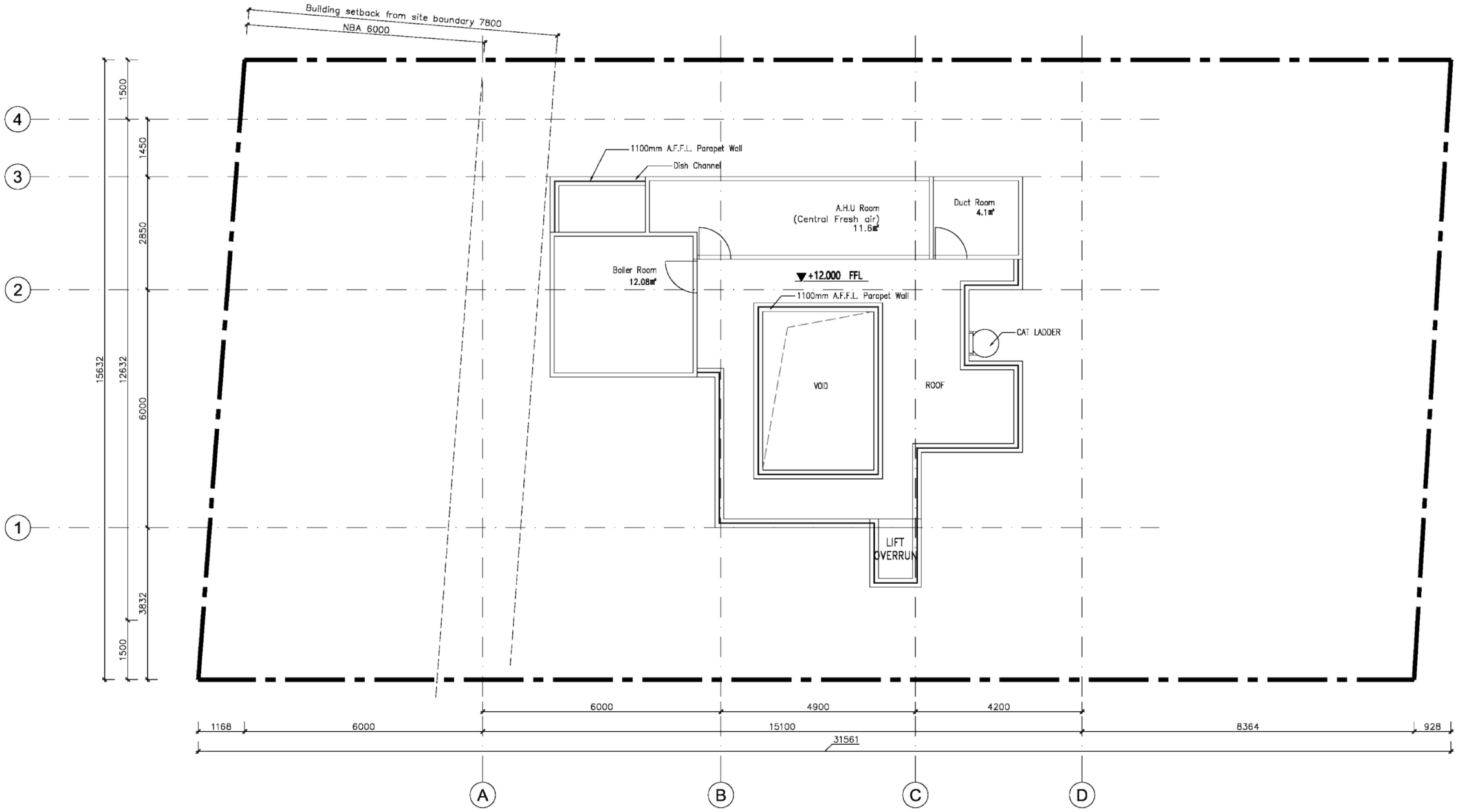
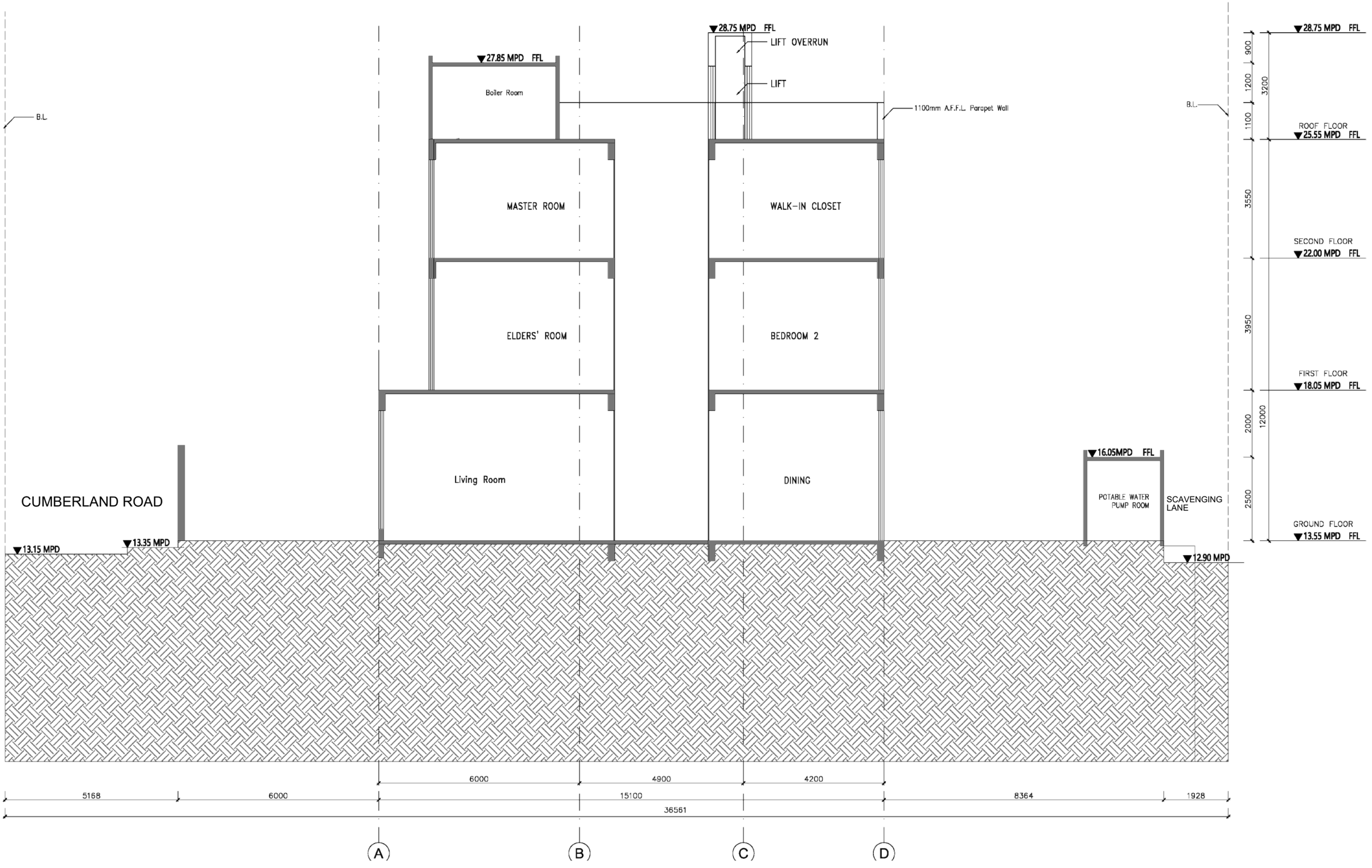
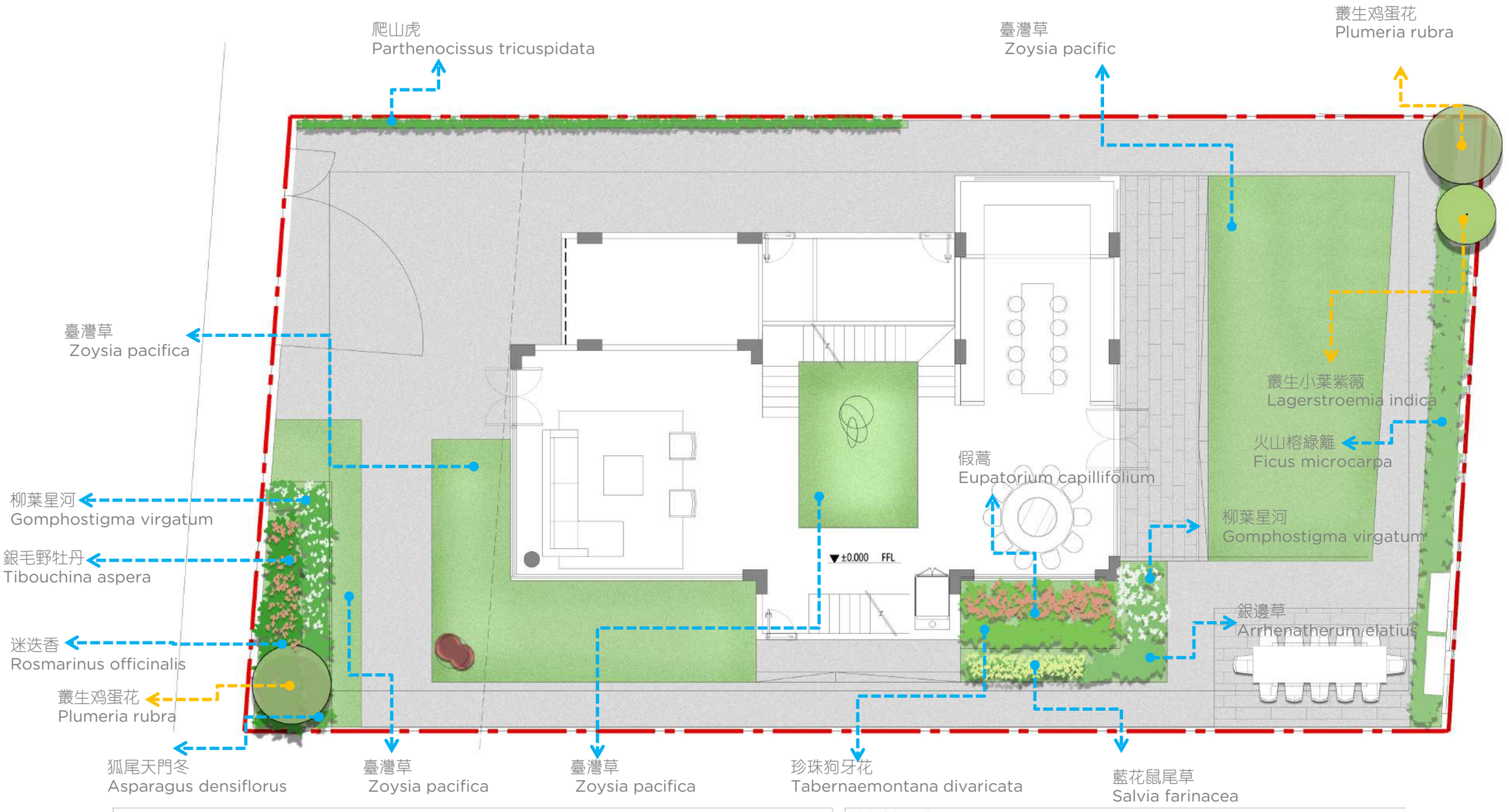

Building setback from site boundary 7800
NBA 6000
1100mm A.F.F.L. Parapet Wall
Dish Channel
A.H.U Room
(Central Fresh air)
11.6㎡
Duct Room
4.1㎡
Boiler Room
12.08㎡
+12.000 FFL
1100mm A.F.F.L. Parapet Wall
CAT LADDER
VOID
ROOF
LIFT
OVERRUN
4
3
2
1
A
B
C
D
1500
1450
2850
6000
12632
15632
3832
1500
6000
4900
4200
1168
6000
15100
8364
928
31561


B.L.
CUMBERLAND ROAD
▼13.15 MPD
▼13.35 MPD
▼27.85 MPD FFL
Boiler Room
▼28.75 MPD FFL
LIFT OVERRUN
LIFT
1100mm A.F.F.L. Parapet Wall
MASTER ROOM
WALK-IN CLOSET
ELDERS' ROOM
BEDROOM 2
Living Room
DINING
▼16.05MPD FFL
POTABLE WATER PUMP ROOM
SCAVENGING LANE
▼12.90 MPD
6000
4900
4200
5168
6000
15100
8364
1928
36561
A
B
C
D
B.L.
▼28.75 MPD FFL
900
1200
3200
1100
ROOF FLOOR
▼25.55 MPD FFL
3550
SECOND FLOOR
▼22.00 MPD FFL
3950
FIRST FLOOR
▼18.05 MPD FFL
2000
12000
2500
GROUND FLOOR
▼13.55 MPD FFL

APPENDIX 3
LANDSCAPE PROPOSAL

GROUND FLOOR_PLANTING PLAN



Proposed New Trees

	Chinese Name	Botanical Name	DBH (cm)	Height (cm)	Spread (cm)	quantity
1	丛生鸡蛋花	Plumeria rubra	15	400-450	300-350	2
2	丛生小叶紫薇	Lagerstroemia indica	10	250-300	200-250	1

Schrubs & Ground Covers

	Chinese Name	Botanical Name	Height (cm)	Spread (cm)
1	台湾草	Zoysia pacifica	/	/
2	狐尾天门冬	Asparagus densiflorus	25-30	25-30
3	迷迭香	Rosmarinus officinalis	30-45	30-40
4	银边草	Arrhenatherum elatius	25-30	25-30
5	珍珠狗牙花	Tabernaemontana divaricata	25-30	25-30
6	火山榕绿篱	Ficus microcarpa	180-200	50-60
7	蓝花鼠尾草	Salvia farinacea	25-30	25-30
8	柳叶星河	Gomphostigma virgatum	30-45	30-40
9	银毛野牡丹	Tibouchina aspera	25-30	25-30
10	假蒿	Eupatorium capillifolium	45-60	25-30
11	爬山虎	Parthenocissus tricuspidata	/	/

GROUND FLOOR_PLANT SELECTION

Feature Tree

叢生雞蛋花
Plumeria rubra

叢生小葉紫薇
Lagerstroemia indica

Schrubs & Ground Covers

臺灣草
Zoysia pacifica

狐尾天門冬
Asparagus densiflorus

迷迭香
Rosmarinus officinalis

銀邊草
Arrhenatherum elatius

珍珠狗牙花
Tabernaemontana divaricata

火山榕綠籬
Ficus microcarpa

藍花鼠尾草
Ficus microcarpa

柳葉星河
Gomphostigma virgatum

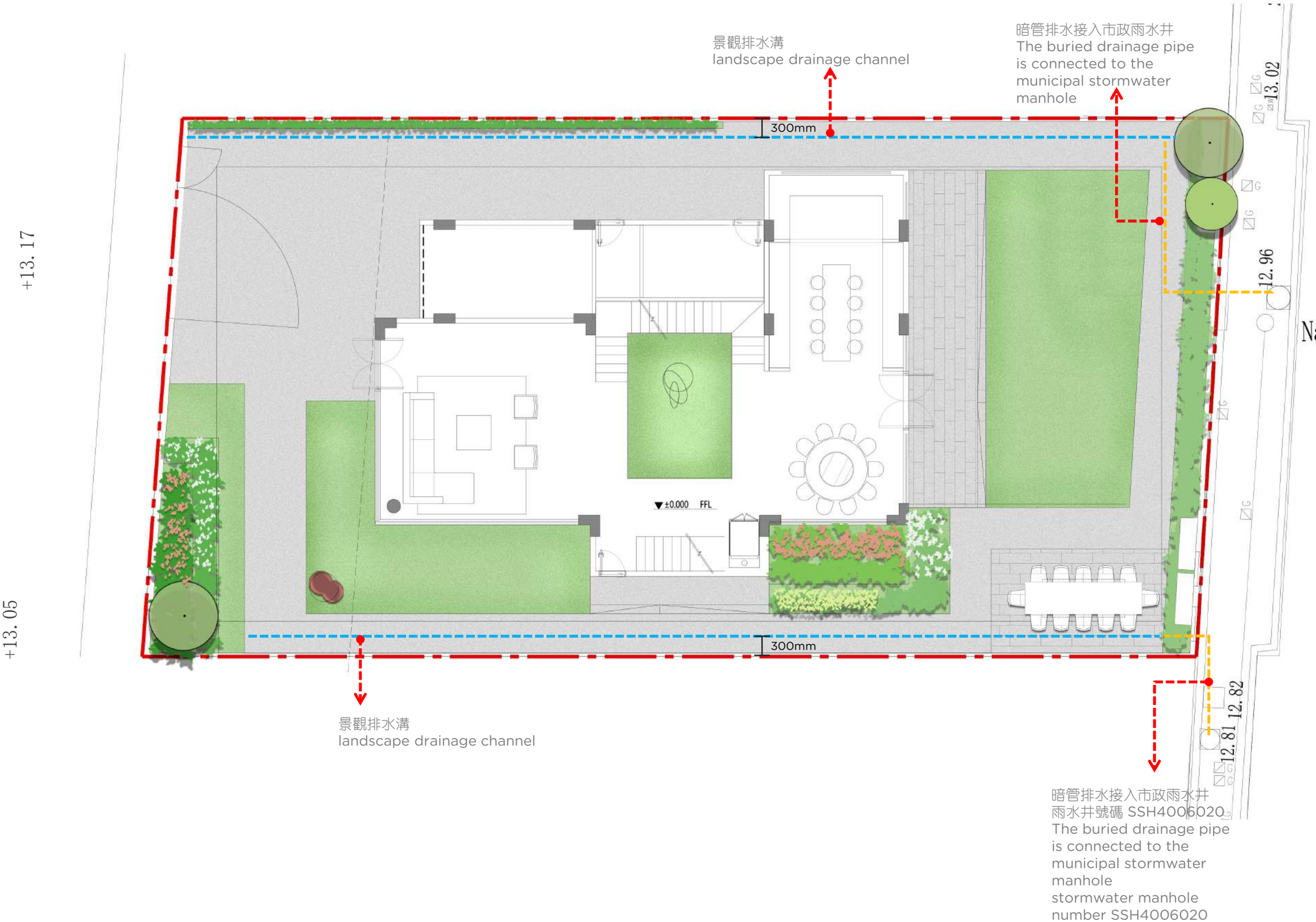
銀毛野牡丹
Tibouchina aspera

假蒿
Eupatorium capillifolium

爬山虎
Parthenocissus tricuspidata

APPENDIX 4
DRAINAGE PROPOSAL

GROUND FLOOR_SITE DRAINAGE ANALYSIS



DeSPACE (International) Limited

Date: 22nd July 2026

BY HAND & EMAIL

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

Dear Sir/Madam,

SECTION 16 APPLICATION
TOWN PLANNING ORDINANCE (CHAPTER 131)

****

PROPOSED MINOR RELAXATION OF BUILDING HEIGHT RESTRICTION TO ALLOW FOR ONE STOREY OF BASEMENT FOR CARPARKING AND ANCILLARY PLANT ROOM FOR THE PERMITTED HOUSE DEVELOPMENT AT NEW KOWLOON INLAND LOT NO. 754, 4 CUMBERLAND ROAD, KOWLOON TONG, KOWLOON

Planning Application No. A/K18/351 – Further Information (2)

References are made to the emails dated 17th and 20th July 2026 regarding comments from various government departments.

To address the comments, please find the attached documents for your reference:

- Response-to-comment (R-to-C) table (**Attachment 1**); and
- Replacement Pages Nos. 1, 15, 17, 20, 21 & Appendices 1, 2, 3, 4 of the Supplementary Planning Statement (**Attachment 2**).

Should you have any queries with this submission, please feel free to contact Mr. Arthur Ma at [redacted] or the undersigned at [redacted].

Yours faithfully,
FOR AND ON BEHALF OF
DeSPACE (INTERNATIONAL) LIMITED

p.p.

DeSPACE (International) Limited 構建(國際)有限公司

Greg Lam

PROPOSED MINOR RELAXATION OF BUILDING HEIGHT RESTRICTION TO ALLOW FOR ONE STOREY OF BASEMENT FOR CARPARKING AND ANCILLARY PLANT ROOM FOR THE PERMITTED HOUSE DEVELOPMENT AT NEW KOWLOON INLAND LOT NO. 754, 4 CUMBERLAND ROAD, KOWLOON TONG, KOWLOON

Town Planning Application No. A/K18/351

Attachment 1: Response-to-Comment Table (Departmental Comments)

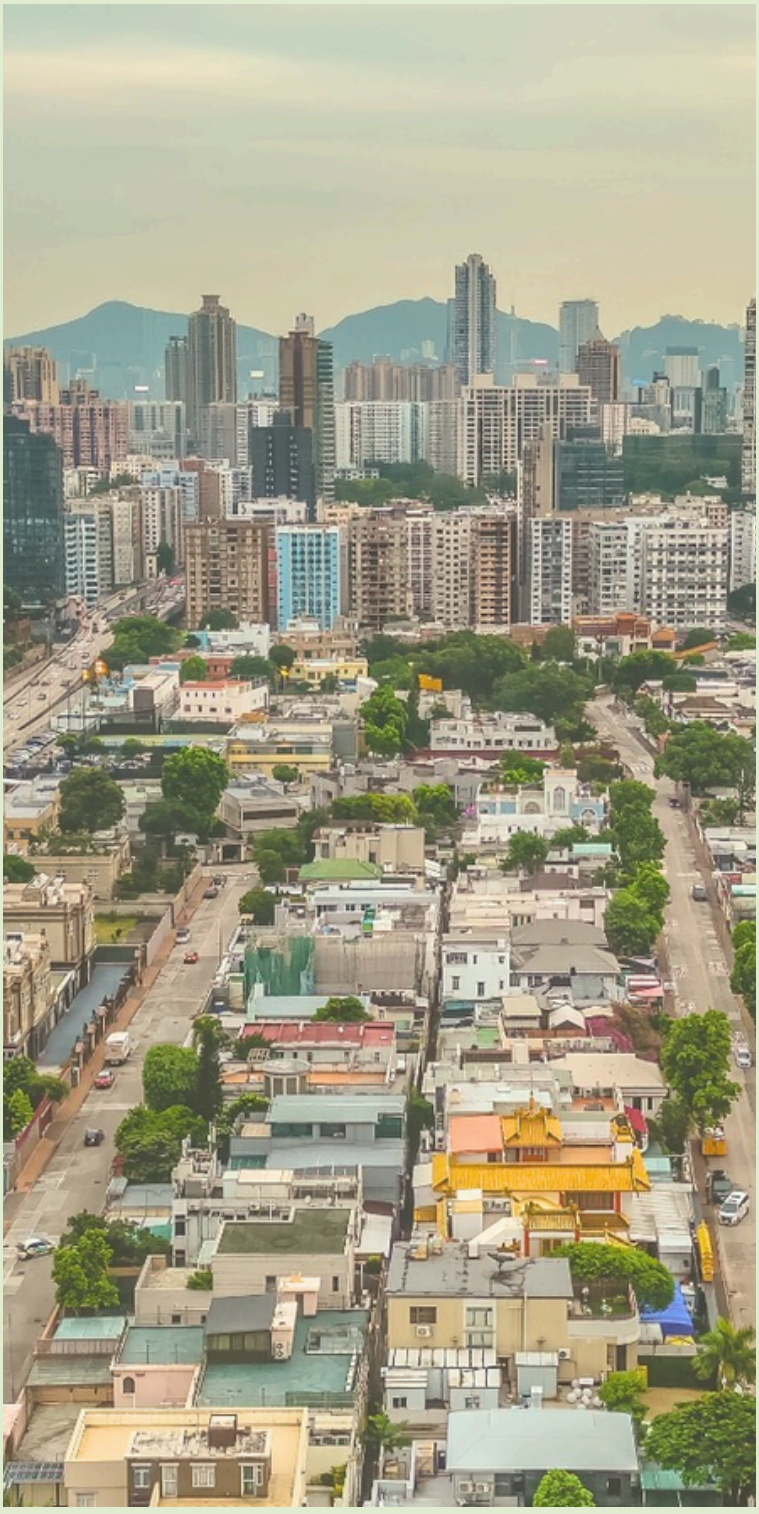
Departmental Comments	*Response*
Transport Department received on 17.7.2026 by email	
1. I have no objection to the proposed parking provisions and vehicular access with clear width not exceeding 5m under the subject application from traffic engineering perspective please.	Noted with thanks.
Urban Design and Landscape Unit, Planning Department received on 17.7.2026 by email	
1. We have no adverse comments on the application from a landscape planning perspective.	Noted with thanks.
Drainage Services Department received on 17.7.2026 by email	
1. Regarding flood resilience measures for basement structure, the applicant may refer to DSD PN No. 2/2023 on various recommended measures, e.g. under section 4.2.	The building Ground Floor is elevated about 400-500mm from the road, so all the entrance to the buildings are Elevated Platforms. And we will elevate all the E&M Equipment on platforms to avoid flood damages. Furthermore, for the Car park lift, we will install Demountable Flood Barrier in front of the Ground Floor lift door.
2. Please note that this is a coordinated reply from the Mainland South Division and the Land Drainage Division of DSD.	Noted with thanks.

SECTION 16 TOWN PLANNING APPLICATION

SUPPLEMENTARY PLANNING STATEMENT

Proposed Minor Relaxation of Building Height Restriction to Allow for One Storey of Basement for Carparking and Ancillary Plant Room for the Permitted House Development

At New Kowloon Inland Lot No. 754,
4 Cumberland Road, Kowloon Tong, Kowloon



REVISED IN LATE JULY 2026

APPLICANTS SHENG FANG & YANG JUAN

PLANNING AND LANDS CONSULTANT DeSPACE (INTERNATIONAL) LIMITED

ARCHITECT LOCUS ASSOCIATES LIMITED

AUTHORIZED PERSON AND STRUCTURAL ENGINEER S.T. WONG AND PARTNERS LIMITED

4. THE PROPOSED REDEVELOPMENT

TABLE 2 – KEY DEVELOPMENT PARAMETERS

Development Parameters	OZP-compliant Scheme	Proposed Scheme	Compliancy
Site Area	About 478.48 sq. m. (or 5,150.47 sq. ft.)		N/A
Gross Floor Area ("GFA")	About 287.0 sq. m.	About 287.0 sq. m. (1)	B(P)R complied
Plot Ratio ("PR")	About 0.60	About 0.60	OZP Complied
Building Height ("BH")	12m (25.55mPD at roof level)	12m (25.55mPD at roof level)	JPN5 complied
No. of Storeys	3 storeys	4 storeys (including 1 level of basement)	Minor relaxation to be sought
Site Coverage ("SC")	42% (about)	30% (About)	Within the range to cases in **Table 1**
Basement Area	N/A	362 sq,m. (about 75.6% of site area)	Within the range to cases in **Table 1**
Greening Ratio	About 10% (or 47.8 sq.m.)	Not less than 20% (or not less than 95.6 sq.m.)	Within the range to cases in **Table 1**
Car Parking	2 Private Car Parking Spaces (including 1 Accessible Visitor Car Parking Space)	**3 Private Car Parking Spaces (including 1 Accessible Visitor Car Parking Space)**	Within an acceptable range in relation to site area compared to cases in **Table 1**
Loading/ Unloading ("L/UL") Facilities	N/A	**1 Private Car, Van-type Light Goods Vehicle ("LGV") Space**	Within an acceptable range in relation to site area compared to cases in **Table 1**

(1) According to the Practice Note for Authorised Persons, Registered Structural Engineers and Registered Geotechnical Engineers (PNAP) No. APP-2, the GFA of the proposed basement private car park, ancillary plant rooms, and access staircases can be disregarded under the Buildings Ordinance.

4. THE PROPOSED REDEVELOPMENT

4.2.4 Enhanced Greening Ratio

The Proposed Redevelopment commits to achieve a greenery ratio of not less than 20%, This is made possible precisely because of the basement, which confines the building footprint to a compact area below grade and frees up the remaining at-grade areas and rooftop for generous soft landscaping. An OZP-compliant scheme without a basement would be less able to achieve a desirable level of greenery, as the building footprint at grade would occupy a proportionally greater share of the site area due to the necessary provision of plant rooms. The provision of a basement therefore directly enables a higher standard of greening that would otherwise be unattainable.

4.2.5 Relocation of Ancillary Facilities to Basement

The proposed basement accommodates all private car parking spaces and ancillary plant rooms below ground. By consolidating these facilities within the basement, the Proposed Redevelopment eliminates the visual clutter that would otherwise result from the placement of bulky plant and equipment at ground and roof level, as would be required under an OZP-compliant scheme. The outcome is a clean, unencumbered roofscape that enhances the local townscape when viewed from surrounding properties and elevated vantage points, and a building form that presents a more refined and carefully considered appearance in keeping with the residential character of the KTGE.

5. PLANNING CONSIDERATIONS

5.3 APPROPRIATE DEVELOPMENT SCALE

5.3.1 The proposed basement is of a proportionate and justified scale, sized exclusively to accommodate uses that are functionally necessary for the Proposed Redevelopment. With a basement footprint of *about 75.6%* of the site area, the extent of the basement is directly dictated by two categories of operational requirement: HKPSG-compliant car parking provision comprising 3 private spaces with 1 accessible visitor space, together with the circulation and manoeuvring areas that such provision requires; and essential building services plant including water tanks, mechanical and electrical facilities. No portion of the basement is devoted to any discretionary or extraneous use.

5.3.2 Given the constrained site area, basement provision is the only viable means of satisfying both the parking requirement and the need to consolidate building services without consuming at-grade land that would otherwise be available for landscaping. An OZP-compliant scheme without a basement would be less effective in accommodating parking at grade in line with HKPSG, would require bulky plant rooms to be distributed across the ground and roof levels, and would result in a reduced level of greening generally demonstrated in similar developments. By accommodating these functional elements below ground, the Proposed Redevelopment achieves a materially superior planning outcome in every measurable respect.

5.3.3 Since the basement floor area for car parking and ancillary plant rooms is disregarded under PNAP APP-2, both the plot ratio of 0.6 and site coverage of about 30% are strictly observed, with no increase in above-ground bulk resulting from the basement. Assessed against the approved precedents in Table 1, the proposed basement-to-site area ratio falls squarely within the established range of 41% to 76%, with the two most recently approved cases at 3 and 5 Lincoln Road both achieving 73% on sites considerably larger than the Application Site. The relatively high ratio in the present case is a direct consequence of the small site area rather than any attempt to maximise basement extent beyond what is functionally necessary. Therefore, in terms of site-specific context, the proposed basement is consistent with comparable approved cases and is considered to be of an appropriate, justified and not excessive scale in the circumstances of this application.

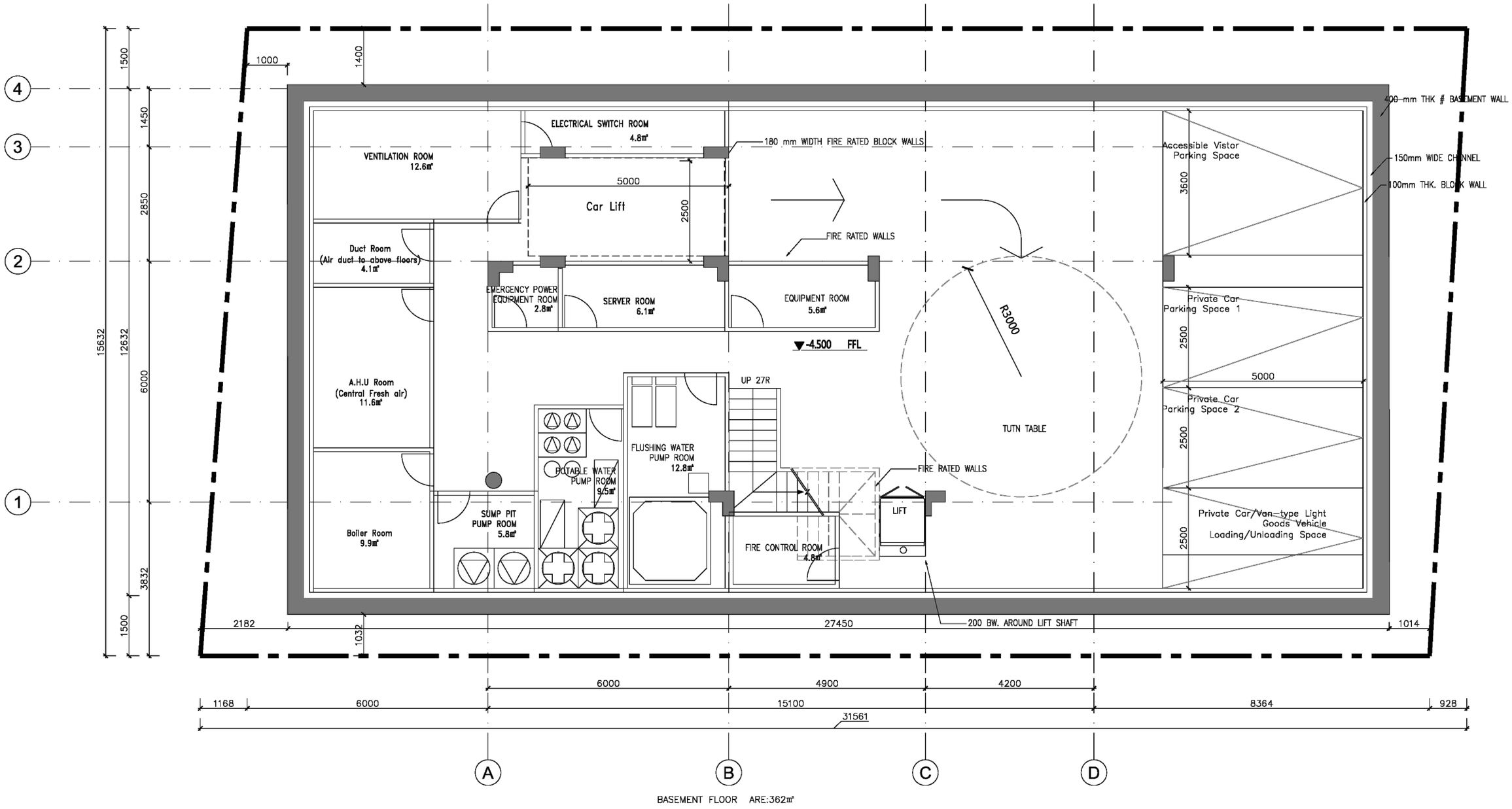
5. PLANNING CONSIDERATIONS

5.4 NO ADVERSE LANDSCAPE IMPACT

5.4.1 The Application Site is situated within an urban landscape context characterised predominantly by low-rise residential buildings. The landscape character of the area is defined by the mature greenery and generous setbacks typical of the KTGE. The Proposed Redevelopment is considered not incompatible with this landscape setting and is unlikely to induce any significant adverse visual or landscape impact.

5.4.2 Compared to the OZP-compliant Scheme, an increase of greenery ratio to *not less than 20%* (under the current scheme) is proposed as an integral component of the Proposed Redevelopment. A Landscape Proposal attached as **Appendix 3** demonstrates that landscaping, including planters and ground cover planting, will be provided at grade along the site boundary, as well as on the setback podiums. The Proposed Redevelopment also ensures that the provision of basement facilities does not compromise meaningful at-grade greening by allowing sufficient soil depth proposed in PNAP APP-152. These measures serve to soften the building mass, enhance the visual amenity of the development, and reinforce the green and open character of the surrounding streetscape.

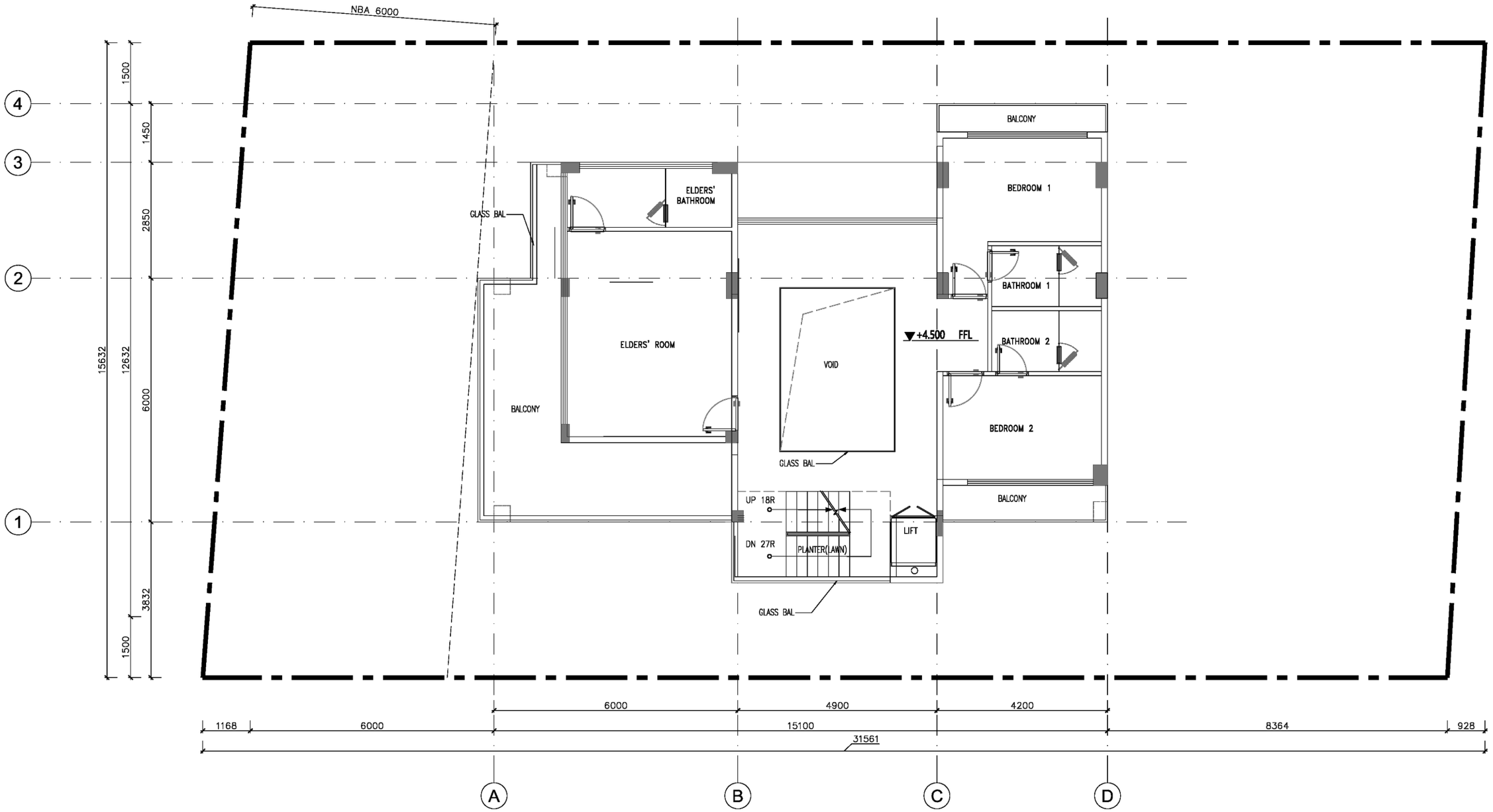
APPENDIX 1
PROPOSED SCHEME



BASEMENT FLOOR ARE:362m²

LEGEND

LANDSCAPE AREA Total: 95.6 sqm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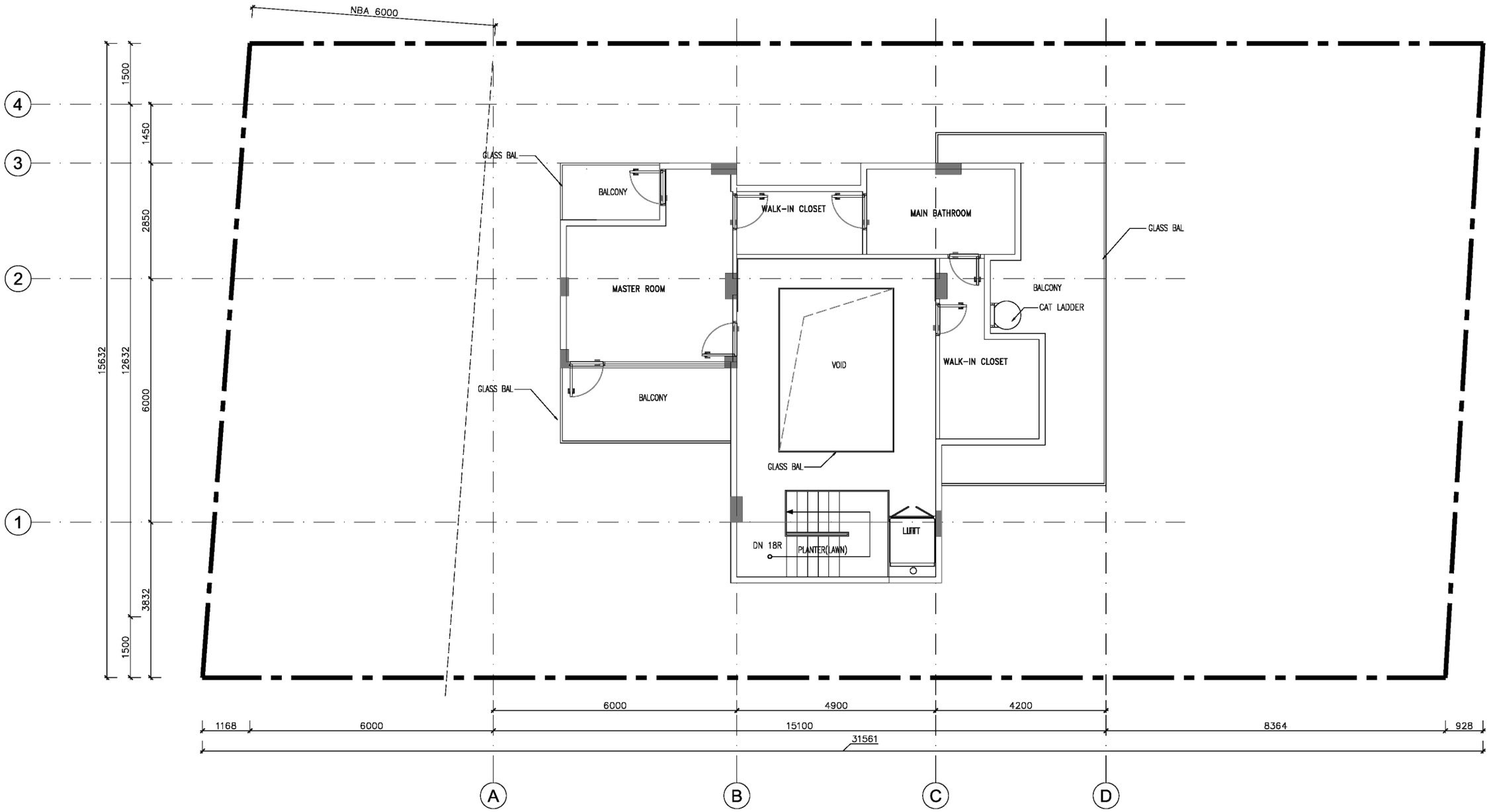
1500
1450
2850
6000
12632
15632
3832
1500
4
3
2
1
BALCONY
BEDROOM 1
ELDERS' BATHROOM
GLASS BAL
BATHROOM 1
ELDERS' ROOM
VOID
+4.500 FFL
BATHROOM 2
BALCONY
BEDROOM 2
GLASS BAL
UP 18R
BALCONY
LIFT
DN 27R
PLANTER(LAWN)
GLASS BAL
6000
4900
4200
1168
6000
15100
8364
928
31561
A
B
C
D


NBA 6000
GLASS BAL
BALCONY
WALK-IN CLOSET
MAIN BATHROOM
GLASS BAL
MASTER ROOM
BALCONY
CAT LADDER
VOID
WALK-IN CLOSET
GLASS BAL
BALCONY
GLASS BAL
LIFT
DN 18R
PLANTER(LAWN)
4
3
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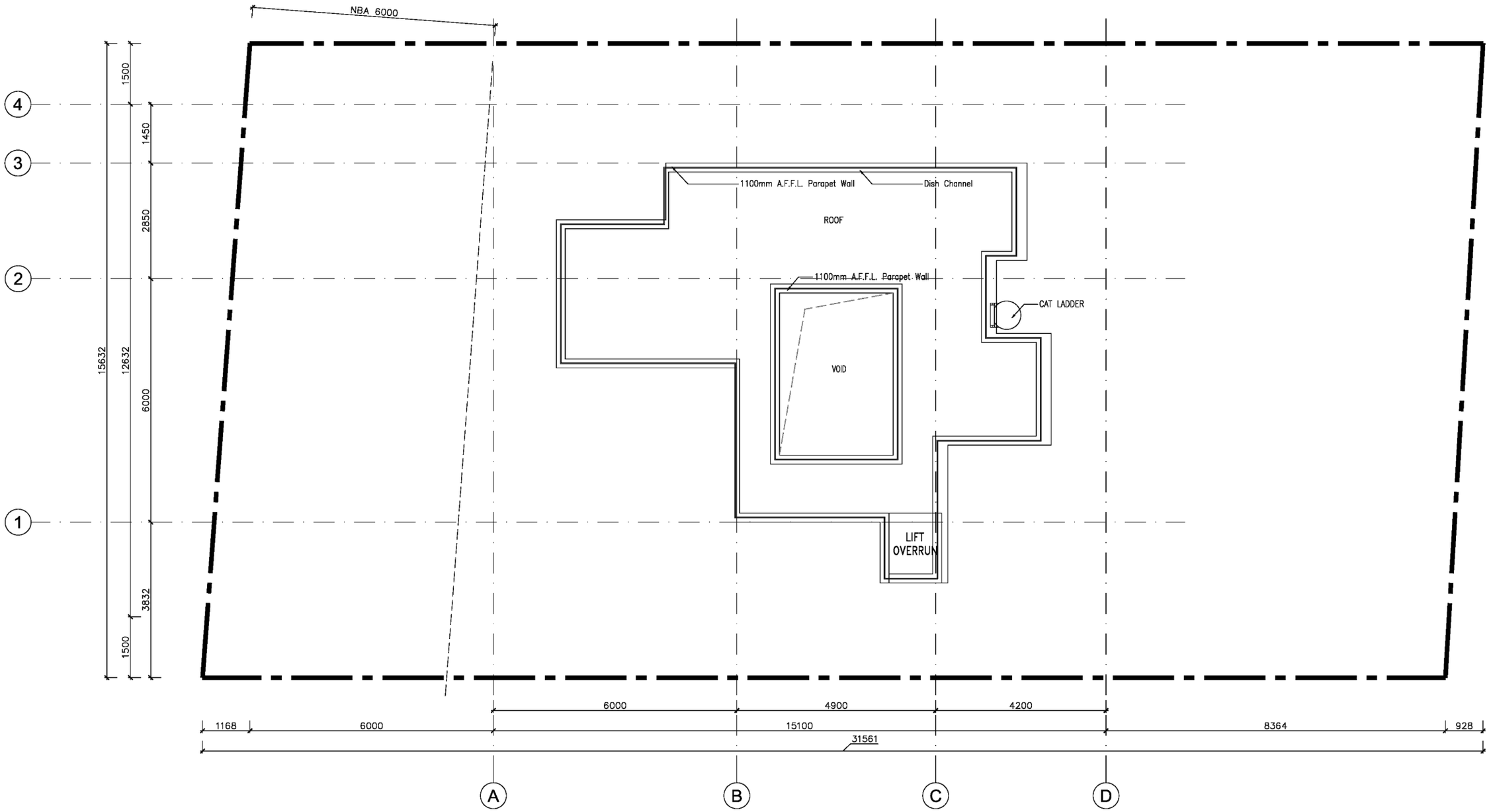
NBA 6000
1100mm A.F.F.L. Parapet Wall
Dish Channel
ROOF
1100mm A.F.F.L. Parapet Wall
CAT LADDER
VOID
LIFT OVERRUN
4
3
2
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1500
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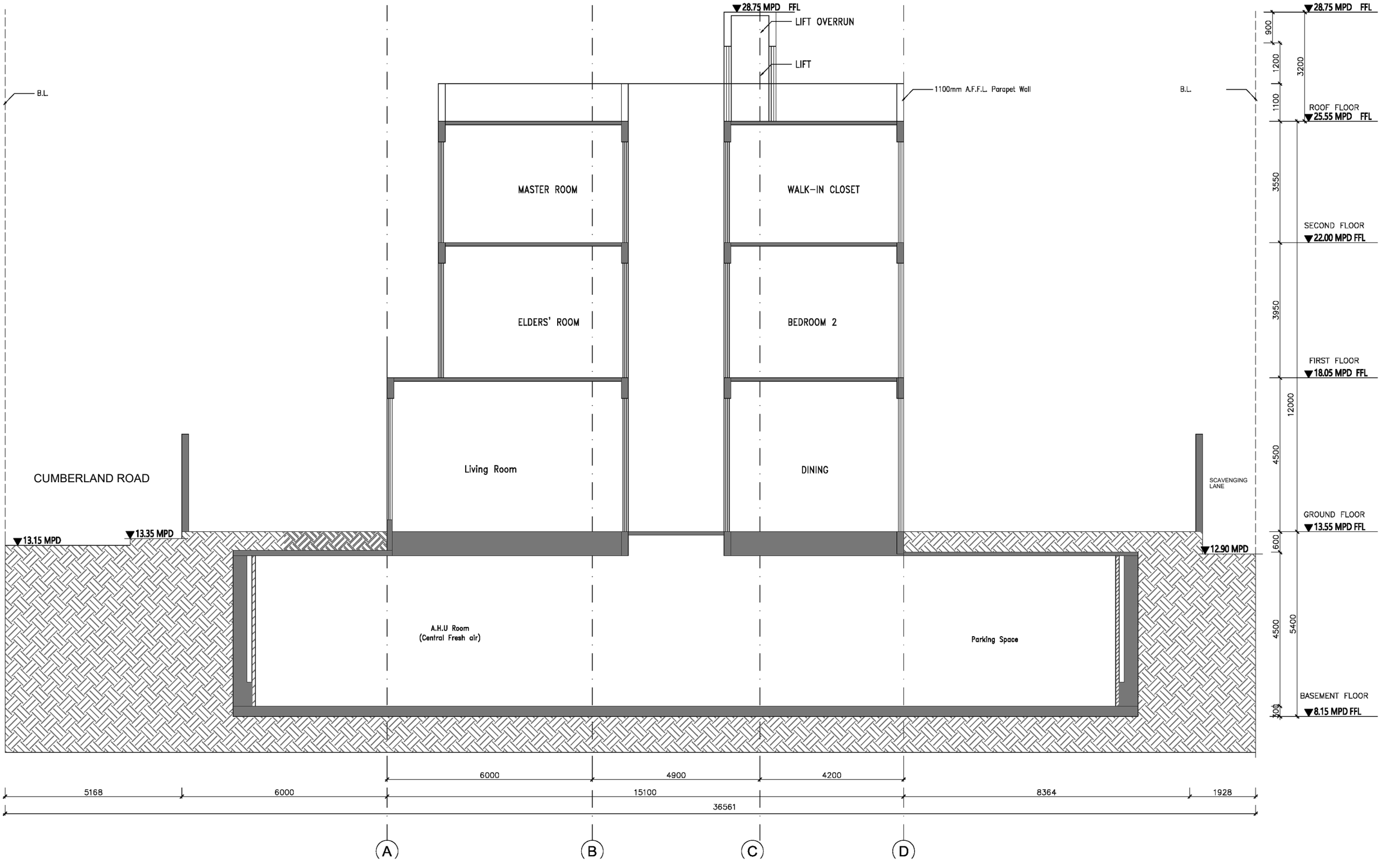
B.L.
28.75 MPD FFL
LIFT OVERRUN
LIFT
1100mm A.F.F.L. Parapet Wall
MASTER ROOM
WALK-IN CLOSET
ELDERS' ROOM
BEDROOM 2
CUMBERLAND ROAD
Living Room
DINING
SCAVENGING LANE
13.15 MPD
13.35 MPD
12.90 MPD
A.H.U Room
(Central Fresh air)
Parking Space
6000
4900
4200
5168
6000
15100
8364
1928
36561
A
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C
D
B.L.
28.75 MPD FFL
900
1200
1100
3200
ROOF FLOOR
25.55 MPD FFL
3550
SECOND FLOOR
22.00 MPD FFL
3950
FIRST FLOOR
18.05 MPD FFL
12000
4500
GROUND FLOOR
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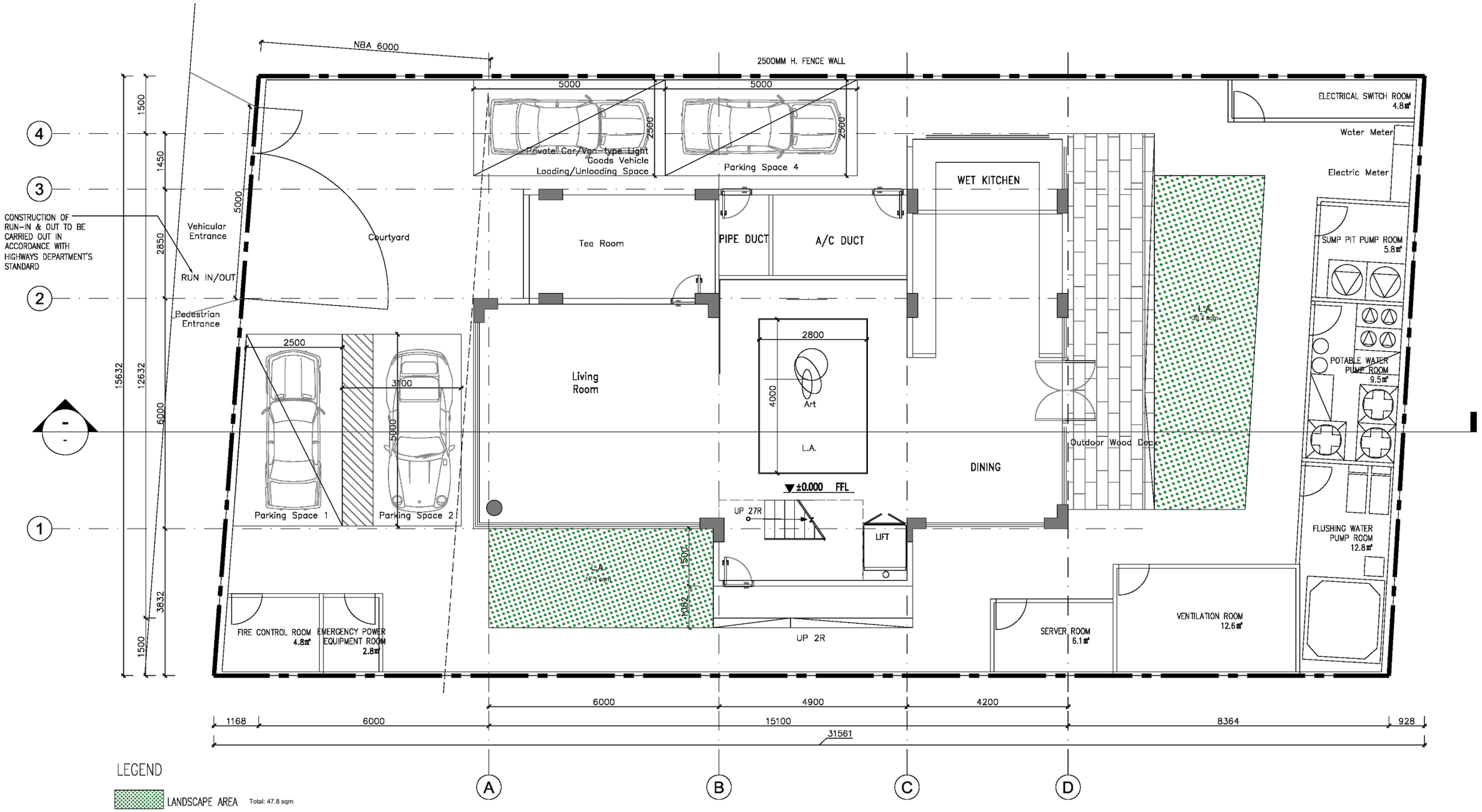
4500
5400
300
BASEMENT FLOOR
8.15 MPD FFL

APPENDIX 2
OZP-COMPLIANT SCHEME


NBA 6000
2500MM H. FENCE WALL
5000
5000
2500
2500
Private Car/Van-type Light Goods Vehicle Loading/Unloading Space
Parking Space 4
ELECTRICAL SWITCH ROOM 4.8㎡
Water Meter
Electric Meter
WET KITCHEN
CONSTRUCTION OF RUN-IN & OUT TO BE CARRIED OUT IN ACCORDANCE WITH HIGHWAYS DEPARTMENT'S STANDARD
Vehicular Entrance
Courtyard
RUN IN/OUT
Pedestrian Entrance
Tea Room
PIPE DUCT
A/C DUCT
SUMP PIT PUMP ROOM 5.8㎡
L.A. 30.2 sqm
POTABLE WATER PUMP ROOM 9.5㎡
2500
3100
2800
Art
4000
L.A.
Living Room
DINING
Outdoor Wood Deck
±0.000 FFL
Parking Space 1
Parking Space 2
UP 27R
LIFT
L.A. 47.6 sqm
1500
1082
FLUSHING WATER PUMP ROOM 12.8㎡
FIRE CONTROL ROOM 4.8㎡
EMERGENCY POWER EQUIPMENT ROOM 2.8㎡
UP 2R
SERVER ROOM 6.1㎡
VENTILATION ROOM 12.6㎡
1500
1450
2850
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15632
12632
6000
3832
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4900
4200
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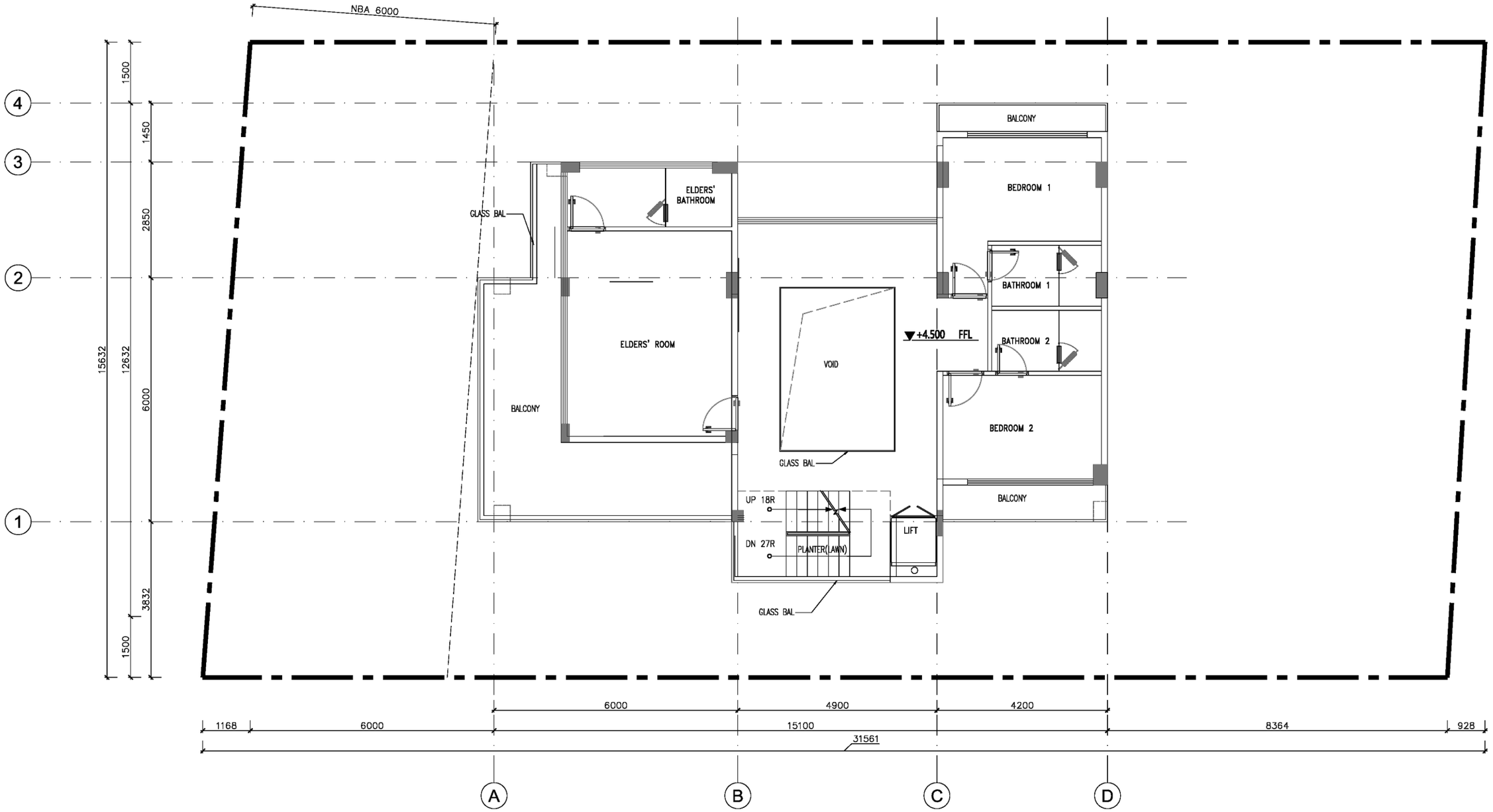
LEGEND
LANDSCAPE AREA Total: 47.8 sqm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BALCONY
BEDROOM 1
ELDERS' BATHROOM
GLASS BAL
BATHROOM 1
BATHROOM 2
ELDERS' ROOM
VOID
+4.500 FFL
BALCONY
BEDROOM 2
GLASS BAL
UP 18R
BALCONY
LIFT
DN 27R
PLANTER(LAWN)
GLASS BAL
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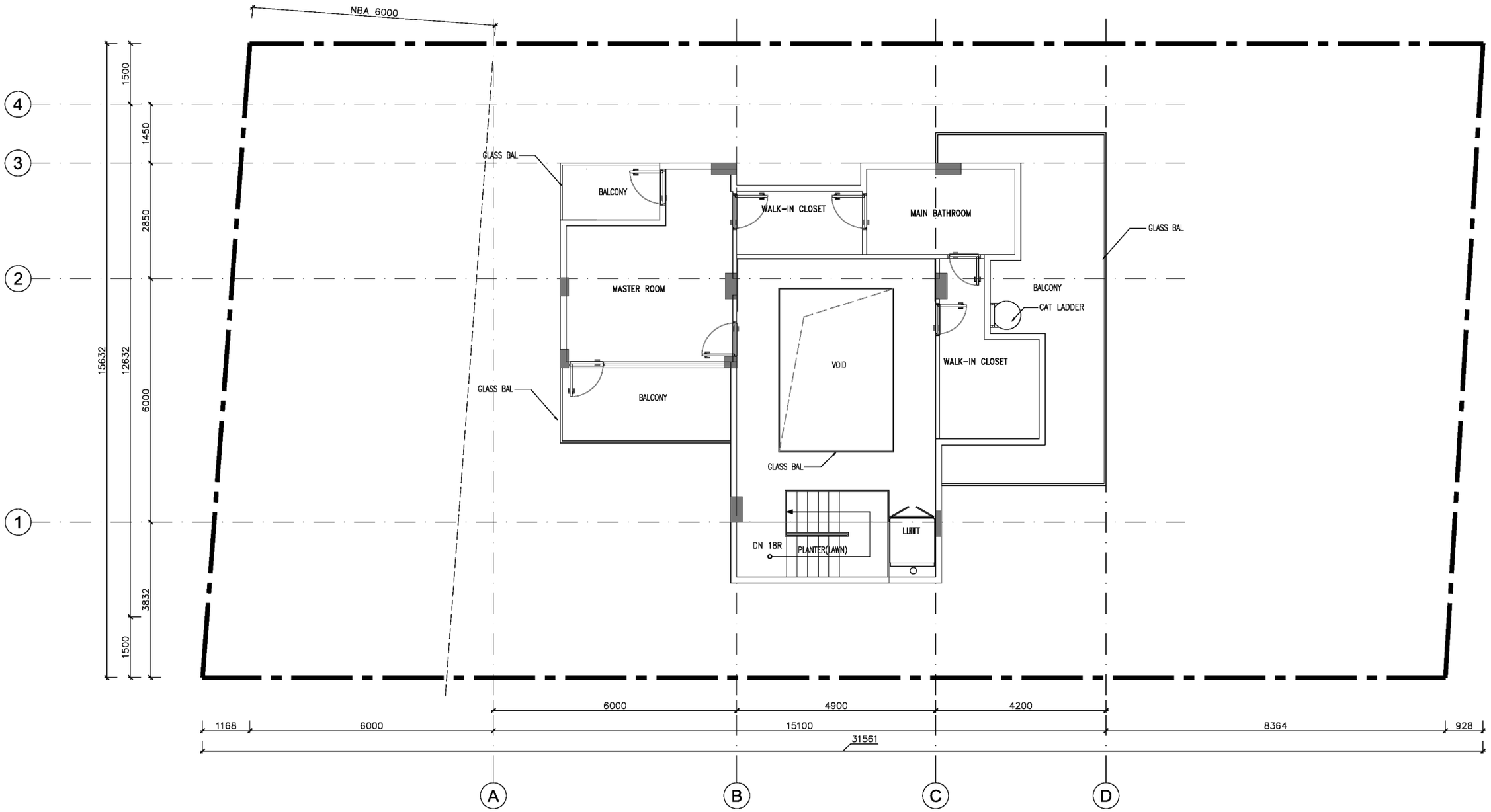
NBA 6000
GLASS BAL
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PLANTER(LAWN)
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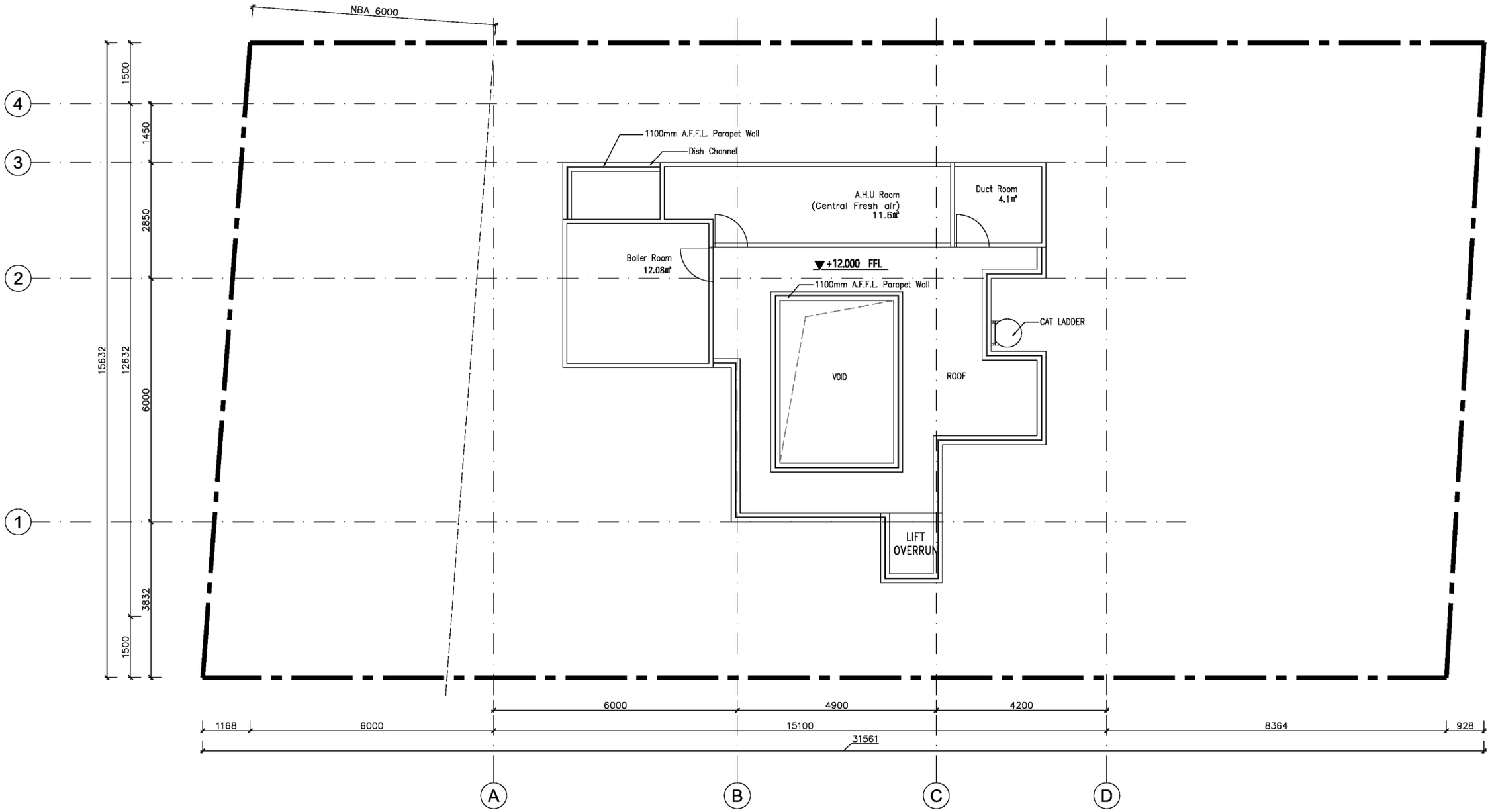
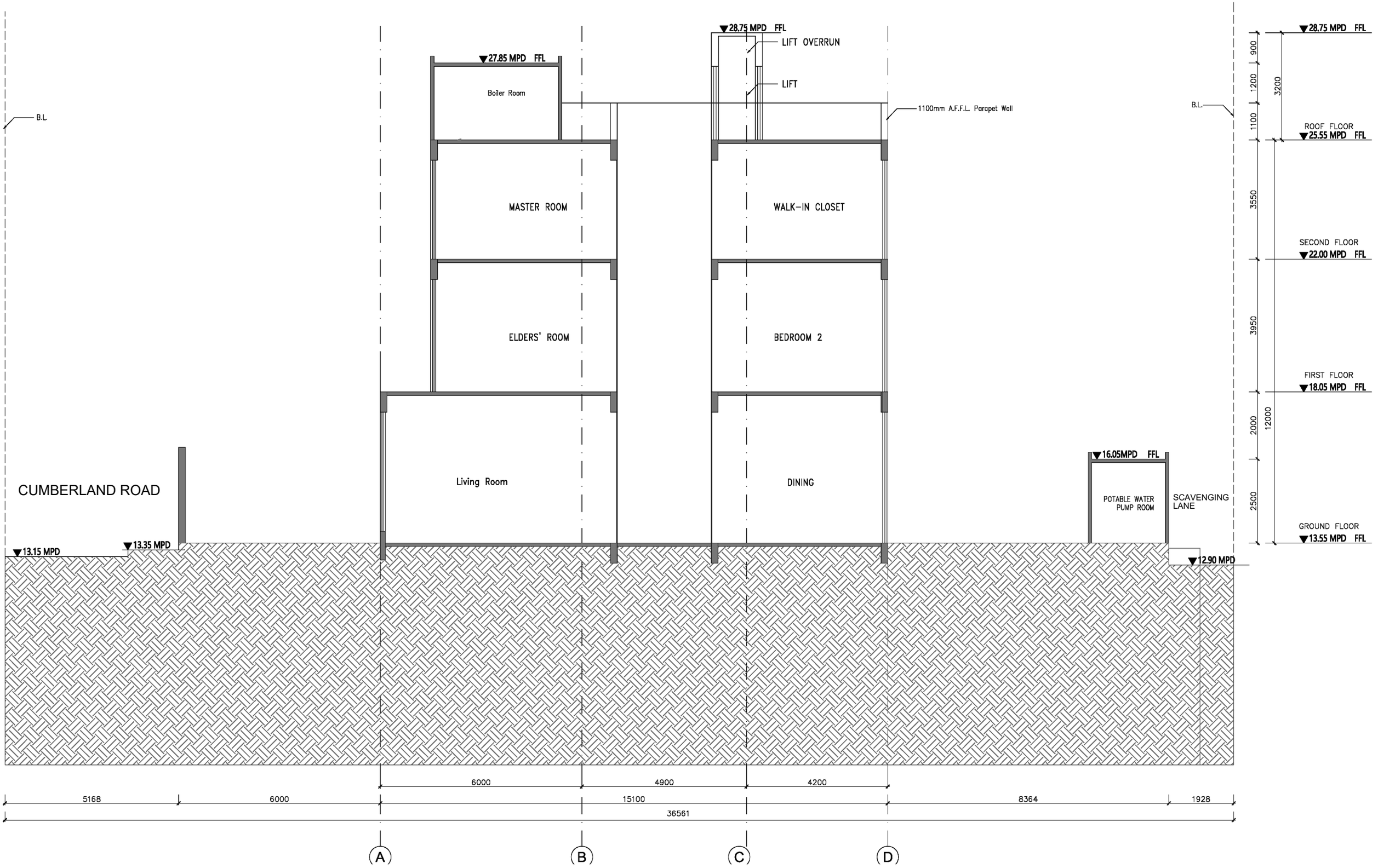
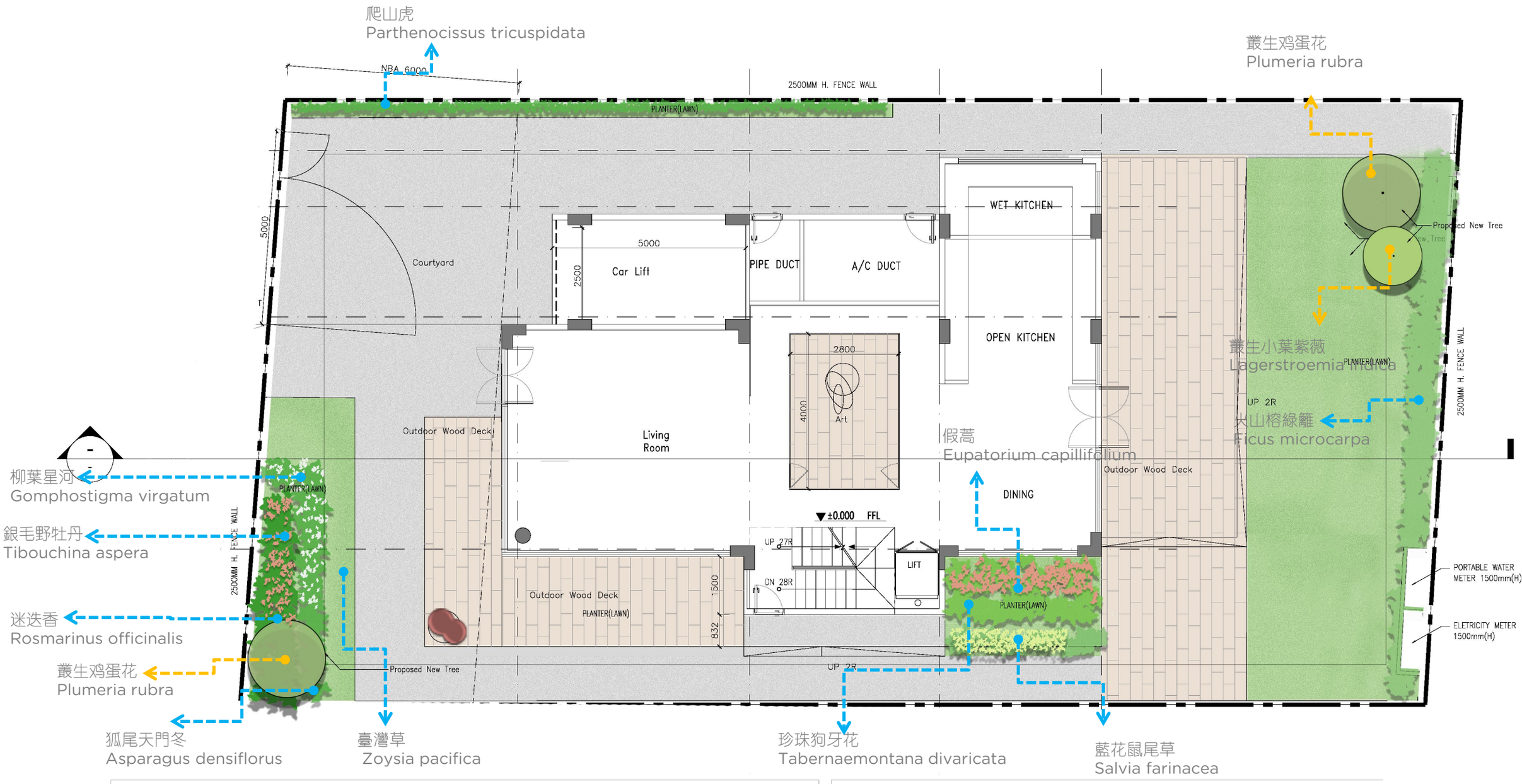
C
D
6000
4900
4200
1168
6000
15100
8364
928
31561


NBA 6000
1100mm A.F.F.L. Parapet Wall
Dish Channel
A.H.U Room
(Central Fresh air)
11.6㎡
Duct Room
4.1㎡
Boiler Room
12.08㎡
+12.000 FFL
1100mm A.F.F.L. Parapet Wall
CAT LADDER
VOID
ROOF
LIFT
OVERRUN
4
3
2
1
1500
1450
2850
15632
12632
6000
3832
1500
1168
6000
6000
4900
4200
15100
8364
928
31561
A
B
C
D


B.L.
CUMBERLAND ROAD
▼28.75 MPD FFL
LIFT OVERRUN
LIFT
▼27.85 MPD FFL
Boiler Room
1100mm A.F.F.L. Parapet Wall
MASTER ROOM
WALK-IN CLOSET
ELDERS' ROOM
BEDROOM 2
Living Room
DINING
▼16.05MPD FFL
POTABLE WATER PUMP ROOM
SCAVENGING LANE
▼13.15 MPD
▼13.35 MPD
▼12.90 MPD
6000
4900
4200
5168
6000
15100
8364
1928
36561
A
B
C
D
B.L.
▼28.75 MPD FFL
900
1200
3200
1100
ROOF FLOOR
▼25.55 MPD FFL
3550
SECOND FLOOR
▼22.00 MPD FFL
3950
FIRST FLOOR
▼18.05 MPD FFL
2000
12000
2500
GROUND FLOOR
▼13.55 MPD FFL

APPENDIX 3
LANDSCAPE PROPOSAL

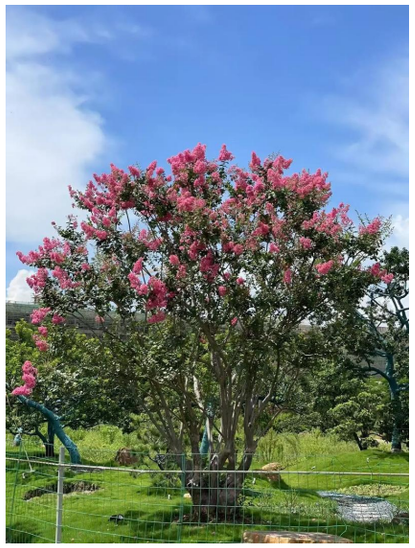


Trees						
	Chinese Name	Botanical Name	DBH (cm)	Height (cm)	Spread (cm)	quantity
1	丛生鸡蛋花	Plumeria rubra	15	400-450	300-350	2
2	丛生小叶紫薇	Lagerstroemia indica	10	250-300	200-250	1

Schrubs & Ground Covers				
	Chinese Name	Botanical Name	Height (cm)	Spread (cm)
1	台湾草	Zoysia pacifica	/	/
2	狐尾天门冬	Asparagus densiflorus	25-30	25-30
3	迷迭香	Rosmarinus officinalis	30-45	30-40
4	银边草	Arrhenatherum elatius	25-30	25-30
5	珍珠狗牙花	Tabernaemontana divaricata	25-30	25-30
6	火山榕绿篱	Ficus microcarpa	180-200	50-60
7	蓝花鼠尾草	Salvia farinacea	25-30	25-30
8	柳叶星河	Gomphostigma virgatum	30-45	30-40
9	银毛野牡丹	Tibouchina aspera	25-30	25-30
10	假蒿	Eupatorium capillifolium	45-60	25-30
11	爬山虎	Parthenocissus tricuspidata	/	/

Feature Tree

叢生雞蛋花
Plumeria rubra



叢生小葉紫薇
Lagerstroemia indica

Schrubs & Ground Covers

臺灣草
Zoysia pacifica

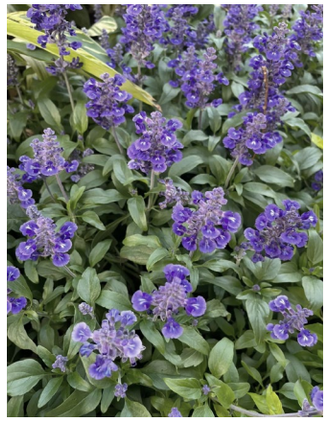
狐尾天門冬
Asparagus densiflorus

迷迭香
Rosmarinus officinalis

銀邊草
Arrhenatherum elatius

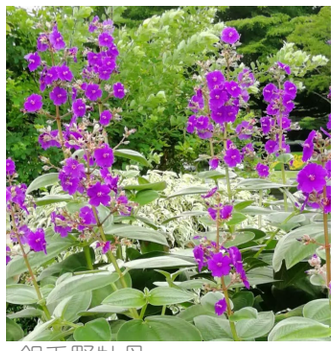
珍珠狗牙花
Tabernaemontana divaricata

火山榕綠籬
Ficus microcarpa



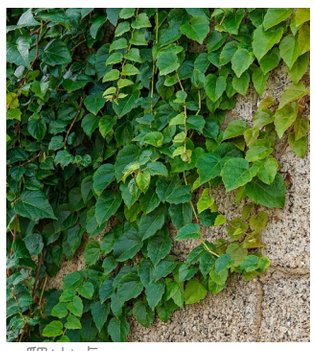
藍花鼠尾草
Ficus microcarpa

柳葉星河
Gomphostigma virgatum



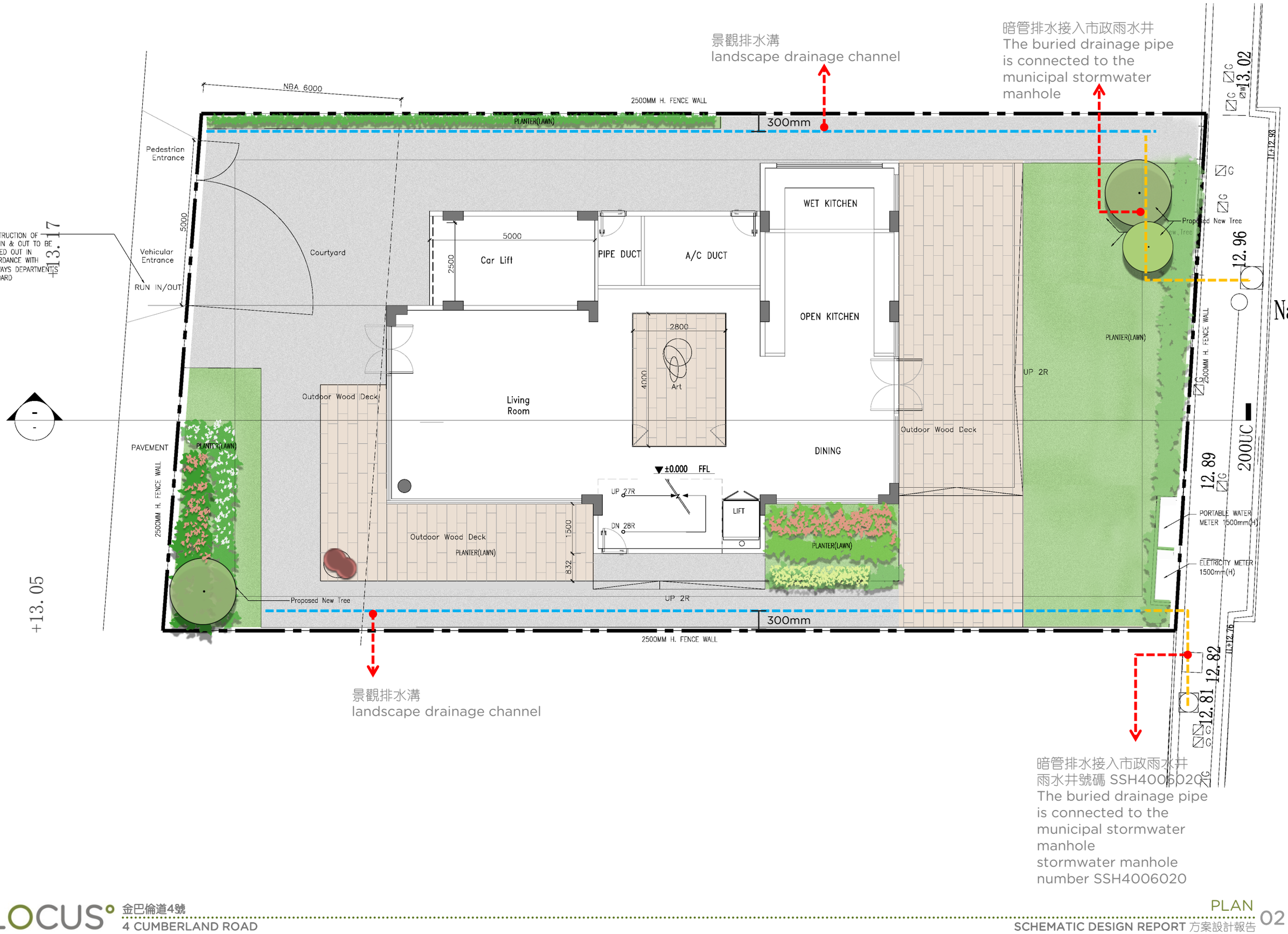
銀毛野牡丹
Tibouchina aspera

假蒿
Eupatorium capillifolium



爬山虎
Parthenocissus tricuspidata

APPENDIX 4
DRAINAGE PROPOSAL


景觀排水溝
landscape drainage channel
暗管排水接入市政雨水井
The buried drainage pipe is connected to the municipal stormwater manhole
NBA 6000
2500MM H. FENCE WALL
PLANTER(LAWN)
300mm
Pedestrian Entrance
5000
Vehicular Entrance
Courtyard
CONSTRUCTION OF RUN-IN & OUT TO BE CARRIED OUT IN ACCORDANCE WITH HIGHWAYS DEPARTMENT'S STANDARD
RUN IN/OUT
+13.17
5000
2500
Car Lift
PIPE DUCT
A/C DUCT
WET KITCHEN
OPEN KITCHEN
2800
4000
Art
Living Room
Outdoor Wood Deck
DINING
UP 2R
Proposed New Tree
PLANTER(LAWN)
2500MM H. FENCE WALL
13.02
12.96
12.89
200UC
PORTABLE WATER METER 1500mm(H)
ELETRICITY METER 1500mm(H)
12.82
12.81
PAVEMENT
+13.05
±0.000 FFL
UP 27R
DN 28R
LIFT
1500
832
景觀排水溝
landscape drainage channel
暗管排水接入市政雨水井
雨水井號碼 SSH4006020
The buried drainage pipe is connected to the municipal stormwater manhole
stormwater manhole number SSH4006020

DeSPACE (International) Limited

Date: 28th July 2026

BY HAND & EMAIL

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

Dear Sir/Madam,

SECTION 16 APPLICATION
TOWN PLANNING ORDINANCE (CHAPTER 131)
****

PROPOSED MINOR RELAXATION OF BUILDING HEIGHT RESTRICTION TO ALLOW FOR ONE STOREY OF BASEMENT FOR CARPARKING AND ANCILLARY PLANT ROOM FOR THE PERMITTED HOUSE DEVELOPMENT AT NEW KOWLOON INLAND LOT NO. 754, 4 CUMBERLAND ROAD, KOWLOON TONG, KOWLOON

Planning Application No. A/K18/351 – Further Information (3)

References are made to the emails dated 27th July 2026 regarding comments from various government departments.

To address the comments, please find the response-to-comment table below for your consideration:

Comment	*Response*
Urban Design & Landscape Unit, Planning Department received on 27.07.2026	
1. Regarding Green Floor_Planting Plan, the annotation of "PLANTER(LAWN)" appears to be at odds on an "Outdoor Wood Deck".	Noted with thanks. Please refer to the replacement of the following pages below (**Attachment 1**): • Ground Floor Plan in Appendix 1 of Supplementary Planning Statement (SPS); • Landscape Plan in Appendix 3 of SPS; and • Drainage Plan in Appendix 4 of SPS.
2. Regarding Ground Floor_Plant Selection, the scientific name (in Latin) of the plant "藍花鼠尾草" should read "Salvia farinacea ".	Noted with thanks. Please refer to the replacement page of Appendix 3 in the Supplementary Planning Statement (**Attachment 1**) for reference.

Should you have any queries with this submission, please feel free to contact Mr. Arthur Ma at [redacted] or the undersigned at [redacted]

Yours faithfully,
FOR AND ON BEHALF OF
DeSPACE (INTERNATIONAL) LIMITED

DeSPACE (International) Limited 構建(國際)有限公司

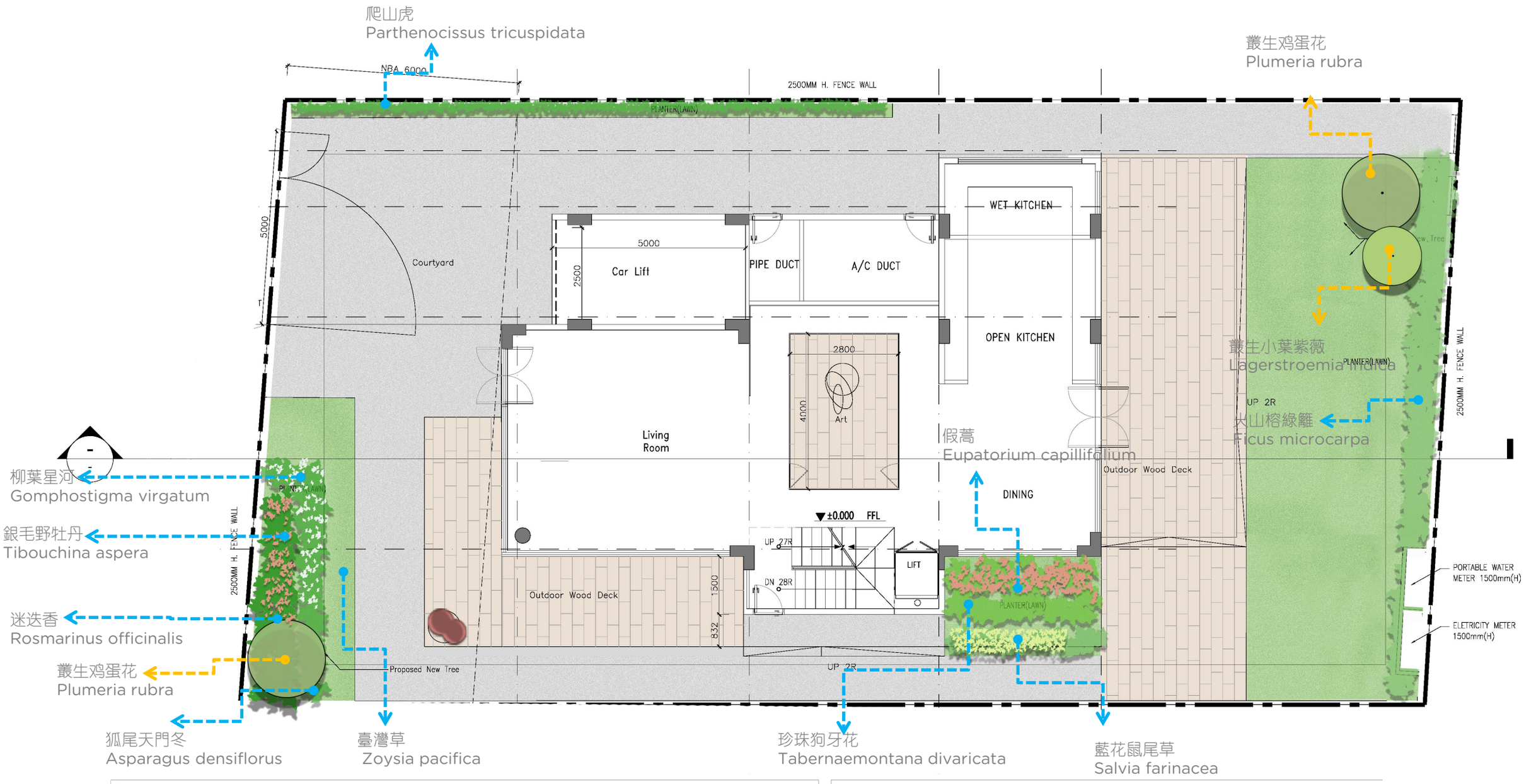
P.P. Greg Lam

APPENDIX 1
PROPOSED SCHEME

LEGEND

LANDSCAPE AREA

APPENDIX 3
LANDSCAPE PROPOSAL



Trees						
	Chinese Name	Botanical Name	DBH (cm)	Height (cm)	Spread (cm)	quantity
1	丛生鸡蛋花	Plumeria rubra	15	400-450	300-350	2
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Schrubs & Ground Covers				
	Chinese Name	Botanical Name	Height (cm)	Spread (cm)
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4	银边草	Arrhenatherum elatius	25-30	25-30
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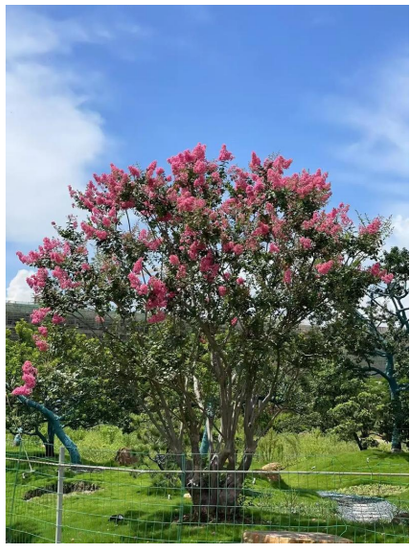
7	蓝花鼠尾草	Salvia farinacea	25-30	25-30
8	柳叶星河	Gomphostigma virgatum	30-45	30-40
9	银毛野牡丹	Tibouchina aspera	25-30	25-30
10	假蒿	Eupatorium capillifolium	45-60	25-30
11	爬山虎	Parthenocissus tricuspidata	/	/

Feature Tree

叢生雞蛋花
Plumeria rubra



叢生小葉紫薇
Lagerstroemia indica

Schrubs & Ground Covers

臺灣草
Zoysia pacifica

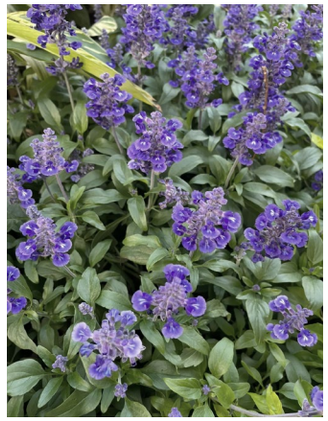
狐尾天門冬
Asparagus densiflorus

迷迭香
Rosmarinus officinalis

銀邊草
Arrhenatherum elatius

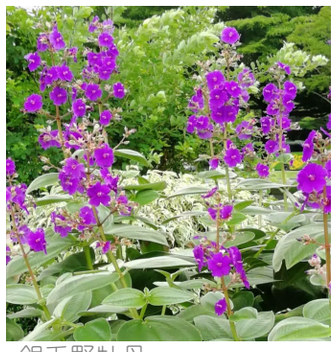
珍珠狗牙花
Tabernaemontana divaricata

火山榕綠籬
Ficus microcarpa



藍花鼠尾草
Salvia farinacea

柳葉星河
Gomphostigma virgatum

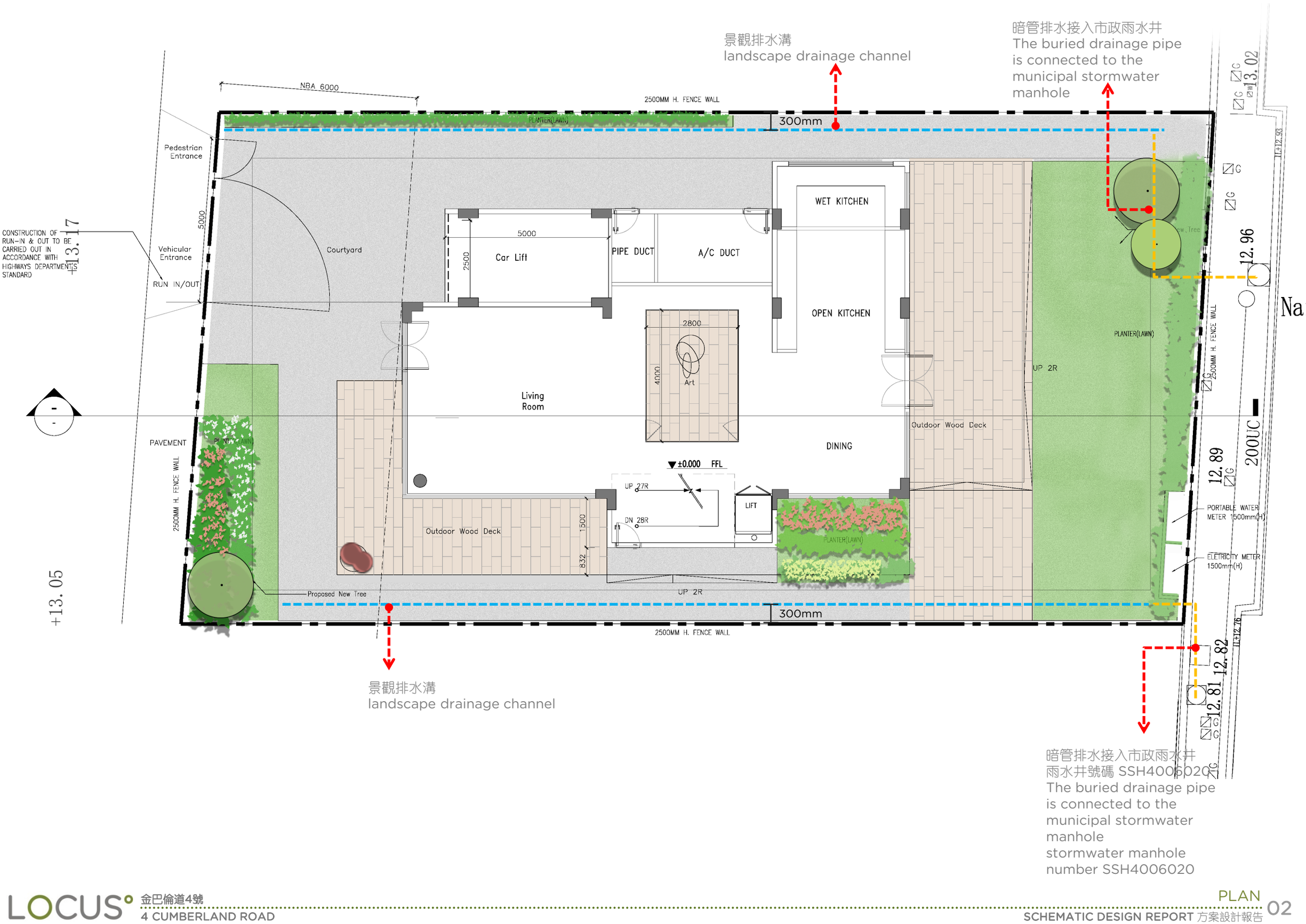


銀毛野牡丹
Tibouchina aspera

假蒿
Eupatorium capillifolium

爬山虎
Parthenocissus tricuspidata

APPENDIX 4
DRAINAGE PROPOSAL


景觀排水溝
landscape drainage channel
暗管排水接入市政雨水井
The buried drainage pipe is connected to the municipal stormwater manhole
NBA 6000
2500MM H. FENCE WALL
PLANTER(LAWN)
300mm
Pedestrian Entrance
Vehicular Entrance
Courtyard
5000
CONSTRUCTION OF RUN-IN & OUT TO BE CARRIED OUT IN ACCORDANCE WITH HIGHWAYS DEPARTMENT'S STANDARD
RUN IN/OUT
+13.17
Car Lift
2500
PIPE DUCT
A/C DUCT
WET KITCHEN
OPEN KITCHEN
2800
4000
Art
Living Room
DINING
Outdoor Wood Deck
UP 2R
UP 27R
DN 28R
±0.000 FFL
LIFT
1500
832
PAVEMENT
Proposed New Tree
Existing Tree
PORTABLE WATER METER 1500mm(H)
ELETRICITY METER 1500mm(H)
13.02
12.96
12.89
12.82
12.81
200UC
+13.05
景觀排水溝
landscape drainage channel
暗管排水接入市政雨水井
雨水井號碼 SSH4006020
The buried drainage pipe is connected to the municipal stormwater manhole
stormwater manhole number SSH4006020

Similar Applications for Minor Relaxation of Building Height Restriction within "Residential (Group C) 1" Zone on the Kowloon Tong Outline Zoning Plan

Approved Applications

No.	Application No.	Location	Proposed Uses/Developments	Basement Area (m^2)	Date of Consideration	Main Reasons for Approval/ Approval Conditions
1.	A/K18/233	4 Somerset Road	Proposed minor relaxation of building height restriction to allow for one storey of basement for ancillary plant room use in a proposed residential development	144	13.1.2006 (MPC)	(i), (ii)/ (a), (b), (c)
2.	A/K18/237	121 Boundary Street	Ditto	146	19.5.2006 (MPC)	(i), (ii)/ (a), (b), (c)
3.	A/K18/263	7 Devon Road	Proposed minor relaxation of building height restriction to allow for one storey of basement for two car parking spaces and ancillary plant room use in a proposed residential development	290	7.8.2009 (MPC)	(i), (ii)/ (a), (b), (c), (d)
4.	A/K18/275	4 Stafford Road	Ditto	410	12.11.2010 (MPC)	(i), (ii)/ (a), (b), (c)
5.	A/K18/276	6 Lincoln Road	Ditto	308	28.1.2011 (MPC)	(i), (ii)/ (a), (b), (c)
6.	A/K18/282	5 Kent Road	Proposed minor relaxation of building height restriction to allow for one storey of basement for six car parking spaces and ancillary plant room use in a proposed residential development	653	1.4.2011 (MPC)	(i), (ii)/ (a), (b), (c), (e)
7.	A/K18/283	8 York Road	Proposed minor relaxation of building height restriction to allow for one storey of basement for two car parking spaces and ancillary plant room use in a proposed residential development	536	15.4.2011 (MPC)	(i), (ii)/ (a), (b), (c), (d)

8.	A/K18/285	7 Kent Road	Proposed minor relaxation of building height restriction to allow for one storey of basement for six car parking spaces and ancillary plant room use in a proposed residential development	542	5.8.2011 (MPC)	(i), (ii)/ (a), (b), (c)
9.	A/K18/286	3 Kent Road	Proposed minor relaxation of building height restriction to allow for one storey of basement for six car parking spaces and ancillary plant room use in a proposed residential development	500	5.8.2011 (MPC)	(i), (ii)/ (a), (b), (c), (e)
10.	A/K18/296	1 Somerset Road	Proposed minor relaxation of building height restriction to allow for one storey of basement for two car parking spaces and ancillary plant room use in a proposed residential development	275	8.2.2013 (MPC)	(i), (ii)/ (a), (c), (d)
11.	A/K18/306	1 Somerset Road	Ditto	227	8.11.2013 (MPC)	(i), (ii)/ (a), (b), (c), (d)
12.	A/K18/307	6 Devon Road	Ditto	357	7.3.2014 (MPC)	(i), (ii)/ (a), (b), (c), (d)

13.	A/K18/326	147 Waterloo Road	Proposed minor relaxation of plot ratio restriction from 0.6 to 0.6862 and minor relaxation of building height restriction from 3 to 4 storeys to allow for one storey of basement for three car parking spaces and ancillary plant room use for the permitted house development	586	3.8.2018 (MPC)	(i), (ii)/ (a), (b), (c), (d), (f)
14.	A/K18/331	7 Lincoln Road	Proposed minor relaxation of BH restriction from 3 to 4 storeys to allow for one storey of basement for two car parking spaces and ancillary plant room for the permitted house development	294	13.9.2019 (TPB upon review)	(i), (ii)/ (b), (c), (d), (g)
15.	A/K18/342	14 Kent Road	Proposed Minor Relaxation of BH Restriction to Allow for One Storey of Basement for Permitted House Use	641	4.3.2022 (MPC)	(i), (ii) / (d)
16.	A/K18/349	5 Lincoln Road	Proposed Minor Relaxation of BH Restriction to Allow for One Storey of Basement for Carparking and Ancillary Plant Room for the Permitted House Development	689	5.9.2025 (MPC)	(i), (ii)
17.	A/K18/350	3 Lincoln Road	Ditto	Ditto	Ditto	Ditto

Main Reasons for Approval:

(i) More tree planting and enhancement in local amenity

(ii) Insignificant/no adverse impacts on environment, drainage, traffic, visual and infrastructural aspects

Approval Conditions:

(a) Submission and implementation of landscape proposal

(b) Provision of water supplies for firefighting and fire services installations

(c) Usual time clause

(d) Design and provision of vehicular access, and/or car parking spaces, and/or loading/unloading facilities

(e) Submission of quarterly tree monitoring reports

(f) Submission of a Noise Impact Assessment and implementation of the noise mitigation measures identified therein

(g) The provision of a minimum overall greenery ratio of 25%

Rejected Applications

No.	Application No.	Location	Proposed Uses/Developments	Basement Area (m^2)	Date of Consideration	Main Reasons for Rejection
1.	A/K18/196	3 Devon Road	Proposed minor relaxation of building height restriction to allow for one storey of basement for six car parking spaces and ancillary plant room use in a proposed residential development	857	20.12.2002 (TPB)	(A), (B)
2.	A/K18/208	Ditto	Ditto	845	25.7.2003 (MPC)	(A), (B)
3.	A/K18/214	Ditto	Ditto	798	4.6.2004 (TPB)	(A), (B)
4.	A/K18/229	Ditto	Ditto	678	18.11.2005 (TPB)	(A), (B)
5.	A/K18/333	147 Waterloo Road	Proposed minor relaxation of BH restriction from 3 to 4 storeys to allow for one storey of basement for three car parking spaces and ancillary plant room use, and minor relaxation of PR restriction from 0.6 to 1.013 for a permitted house development	462	20.9.2019 (MPC)	(B), (C)
6	A/K18/335	14 Kent Road	Proposed minor relaxation of BH restriction to allow for one storey of basement for permitted house use	712	6.11.2020 (MPC)	(D)

Main Reasons for Rejection:

(A) Excessive basement size and insufficient information to demonstrate planning and design merits

(B) Undesirable precedent

(C) Proposed relaxation of plot ratio restriction is excessive and insufficient planning and design merits

(D) Possible adverse impacts on existing trees and insufficient planning and design merit

Recommended Advisory Clauses

(a) the approval of the application does not imply that the proposed building design elements could fulfill the requirements under the Sustainable Building Design Guidelines and the relevant requirements under the lease, and that the proposed gross floor area (GFA) concession (including the basement car park, staircase, plant rooms, etc.) for the proposed development will be approved/granted by the Building Authority (BA). The applicant should approach the Buildings Department (BD) and the Lands Department (LandsD) direct to obtain the necessary approval. If the building design elements, and the GFA concession are not approved/granted by the BA and the Lands Authority and major changes to the current scheme are required, a fresh planning application to the Town Planning Board may be required;

(b) to note the comments of the District Lands Officer/Kowloon East, LandsD that the owner of the Lot shall apply to LandsD for a consent under lease for the proposed redevelopment or a lease modification to implement the proposal. However, there is no guarantee that such application will be approved. Such application, if received, will be processed by LandsD in the capacity as a landlord and if the application is approved, it will be subject to such terms and conditions including, inter alia, payment of premium and administrative fee as may be imposed by LandsD;

(c) to note the comments of the Chief Building Surveyor/Kowloon, BD that

i. all building works are subject to compliance with the BO;
ii. detailed comments under the BO on individual sites for private developments such as permissible PR, site coverage, means of escape, emergency vehicular access, private streets, and / or access roads, open space, barrier free access and facilities, compliances with the sustainable building design guidelines, etc. will be formulated at the building plan submission stage;
iii. service lane should be provided in accordance with Building (Planning) Regulation (B(P)R 28(1)), if applicable. Such service lane shall be excluded from site area for the purpose of PR and site coverage calculations. B(P)R 23 (2)(a) refers; and
iv. GFA concessions for the proposed basement carpark would be considered subject to compliance with the relevant criteria under PNAP APP-2.

(d) to note the comment of the of the Director of Environmental Protection that the applicants is reminded that the implementation of local sewer connection works shall meet the requirements of DSD.

(e) to note the comments of the chief Town Planner / Urban Design & Landscape, PlanD that approval of the s.16 application do not imply approval of the site coverage of greenery requirements under BD's PNAP-152 and/or under the lease. The SC of greenery calculation should be submitted separately to BD for approval.

(f) to note the comment of the Director of Fire Services (D of FS) that fire service installations and water supplies for firefighting shall be provided to the satisfaction of the Director of Fire Services. Detailed fire safety requirements will be formulated upon receipt of a formal submission of Short Term Tenancy or Short Term Waiver, general building plans or referral of the application via the relevant licensing authority and the provision of emergency vehicular access in the subject work shall comply with the requirements as stipulated in Section 6, Part D of the Code of Practice for Fire Safety in Buildings 2011, which is administered by the Building Authority.