

Detailed Comments of Government Departments

(a) Comments of the District Lands Officer/Kowloon West, Lands Department (LandsD):

he has no particular comment from district land administration point of view for the s.16 application. Comments on the proposed gross floor area (GFA) exemption of the adoption of Modular Integrate Construction (MiC) would be provided in the building plan checking stage.

(b) Comments of the Chief Estate Surveyor/Urban Renewal Section, Lands Department:

- (i) as per the Planning Statement submitted by Urban Renewal Authority (URA), URA proposed to adopt MiC in the development at its Development Scheme KC-016 (KC-016), which will gain additional domestic GFA exemption of about 3,700m² under Joint Practice Note No. 8. Such adoption of MiC and the additional domestic GFA exemption will also result in increase in building height (BH), which exceeds the existing building height restriction (BHR) of 140mPD under the URA To Kwa Wan Road / Wing Kwong Street Development Scheme Plan No. S/K9/URA3/2 (the DSP). The planning application therefore seeks to relax the building height restriction under the DSP; and
- (ii) should the approved planning application result in changes to any conditions of the private treaty grant (PTG) approved by the District Lands Conference/ Kowloon on 27.2.2025, the applicant shall make separate submission to LandsD for the relevant amendments. LandsD would process such amendments in the capacity of a landlord and it will be subject to such terms and conditions as considered appropriate.

(c) Comments of the Commissioner for Transport:

- (i) according to the Traffic Review Report submitted for the Planning Application, please see his remarks and comments below:
- (ii) Section 2.2 Internal Transport Facilities
considering that the revised parking and loading/unloading provisions are in accordance with the revised development proposal (Section 2.1) and the conditions set out in the previously endorsed land grant document, he has no particular comment;
- (iii) Section 2.3 Proposed Traffic and Pedestrian Network & Section 2.4 Vehicular Access
the pedestrian and traffic connections of the development, as well as its vehicular access

arrangements, are consistent with those endorsed under the earlier approved Development Scheme Plan. The newly proposed connections are internal, linking different development sites within the area, and are not directly connected to public roads. He considers that the new proposal does not deviate from the previous arrangement but would further enhance resilience and flexibility, with positive implications for traffic circulation and management in the area, he has no adverse comment.

(d) Comments of the Director of Environmental Protection (DEP):

(i) the Application Site (the Site) is zoned “R(A)” on the DSP. Under the notional design scheme of this S.16 application, the no. of storeys of Residential Tower 2 will be increased from 23 to 32 storeys. The number of flats and anticipated population will also be increased from 900 to 1,050 and from 2,520 to 2,835 respectively. Since the Plot Ratio/GFA remains unchanged, URA does not provide environmental assessment (EA) and sewerage impact assessment (SIA) in this application;

(ii) with reference to EA and SIA provided in 2021 to support the Approved DSP scheme, as well as the recent submissions to Environmental Protection Department (EPD), the environmental issues of proposed development are summarised below:

i. on **air quality**, for background, the Approved DSP scheme will have no adverse air quality impact provided that no Air sensitive receivers (ASRs)/fresh air intakes to be located in the Air Quality Objectives (AQOs) exceedance zone of Nitrogen Dioxide (NO₂). Nevertheless, since there were outstanding comments on the methodology approach in the Air Quality Impact Assessment (AQIA), it was yet to confirm the extent of the AQOs exceedance zone in 2021;

recently, an updated AQIA (R9903_v1.2, dated April 2026) was submitted to EPD. He has no further comment to the updated AQIA which concludes that the predicted air quality concentrations of NO₂, Respirable Suspended Particulates (RSP) and Fine Suspended Particulates (FSP) at all identified ASRs comply with the respective AQOs. Since the updated AQIA has demonstrated the proposed development would cause no adverse air quality impact, there is no need to include an AQIA submission clause in the land grant;

ii. on **noise**, the site is adjacent to To Kwa Wan Road and East Kowloon Corridor. Based on the DSP notional scheme in 2021, the EA predicted that even with proposed noise mitigation measures (i.e. acoustic fins and acoustic balconies/windows), the traffic

noise compliance rate could **only achieve 94%** (maximum noise level of 74dB(A) exceeding the noise standard of 70dB(A)). Noise exceedance is found in 57 no. of flats. At that time, DEP advised that all practicable noise mitigation designs/measures to reduce the traffic noise impact were not yet exhausted. As for potential fixed noise impact, the Site is also surrounded by industrial buildings, such as the World Wide Industrial Building. A qualitative study of fixed noise sources showed that no adverse fixed noise impact to the DSP Scheme is anticipated;

while no insurmountable noise impact is anticipated, all practicable noise mitigation measures, such as proper building orientation/design, baffle type of acoustic balconies/windows, should be explored to achieve 100% traffic noise compliance rate. Therefore, **a submission clause for a Noise Impact Assessment (NIA) is required under the land grant** to ensure full compliance with relevant noise standards;

- iii. on **sewerage**, in view of the anticipated increase of sewage flow due to proposed increase of estimated population (about +12.5%) under the current notional design, assessment on the potential impact on the existing public sewerage system and additional sewerage mitigation measure will still be required in an updated SIA. **Submission of SIA** is required during the land grant stage;
 - iv. on **land contamination**, following the approval of DSP scheme, a Contamination Assessment Plan (CAP) was agreed by EPD in May 2025 prior to commencement of land contamination site investigation. Recently, DEP has no further comment on the CAR-RAP (Rev.2 dated 22.5.2026) confirming the details of soil remediation. Submission of Remediation Report (RR) is required after the completion of the soil remediation works. In this connection, if URA could complete the soil remediation works and obtain his approval of the RR **before the issue of the land grant**, a land contamination assessment clause will not be required in land grant stage; and
- (iii) having considered the above, he has **no objection** on the subject development from environmental planning perspective since insurmountable environmental impact arising from the updated scheme is not anticipated. **Technical assessment clauses (NIA and SIA)** are required to be imposed in the land grant conditions to require URA to conduct detailed assessment during the design stage. If the RR is not yet approved before forming the land grant, **land contamination assessment clause** will also be required.

(e) Comments of the Director of Fire Services (D of FS):

- (i) he has no specific comment on the application subject to water supplies for firefighting and fire service installations being provided to the satisfaction of the D of FS;
- (ii) should the application be confirmed to fall under the regulatory regimes, i.e. lands, buildings, licensing and other control regimes, he has no objection to removing the relevant approval conditions without the need for further consultations from Fire Services Department; and
- (iii) detailed fire services requirements will be formulated upon receipt of a formal submission of Short Term Tenancy/ Short Term Waiver, general building plans or referral of application via relevant licensing authority. Furthermore, the EVA provision in the captioned work shall comply with the requirements as stimulated in Section 6, Part D of the Code of Practice for Fire Safety in Buildings 2011, which is administered by the Building Authority.

(f) Comments of the Director of Social Services:

- (i) he understands that URA now proposes to seek minor relaxation of maximum building height restriction for the development at KC-016. According to paragraph 3.2.1 of the Planning Statement submitted by URA, not less than 5,500 square metres of gross floor area will be provided for GIC use within the podia. According to his previous exchanges with URA, Social Welfare Department has proposed and URA has agreed to incorporate the following welfare facilities at this complex:
 - (a) 100-place Residential Care Home for the Elderly;
 - (b) Centre for Home Care Services for Frail Elderly Persons;
 - (c) District Elderly Community Centre Sub-base;
 - (d) Integrated Family Service Centre;
 - (e) Specialised Co-parenting Support Centre; and
 - (f) Independent School Social Work Office;
- (ii) funding from the Lotteries Fund was secured for meeting the construction cost of bare-shell premises for the above welfare facilities. On the understanding that URA will ensure all requirements for the above six welfare facilities will be fulfilled and there will be ongoing liaison with him during the detailed design and construction stages, he has no adverse comment on the planning application.

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tpbpd/PLAND

寄件者: [REDACTED]
寄件日期: 2026年08月25日星期二 23:44
收件者: tpbpd/PLAND
主旨: A/K9289 URA TO KWA WAN ROAD/WING KWONG STREET DSP NO. S/K9/URA3/2
類別: Internet Email

A/K9/289 URS DSP S/K9/URA3/2

1-31 To Kwa Wan Road (odd nos.), 111-127D Ma Tau Wai Road (odd nos.), 2-6 and 10-14 Hung Fook Street (even nos.), 1-5 and 11-19 Kai Ming Street (odd nos.), 1-7 Yuk Shing Street (odd nos.), 2-12 Yuk Shing Street (even nos.), whole of Yuk Shing Street, part of the road sections of Hung Fook Street and Kai Ming Street and various back lanes, Hung Hom

Site area: About 5,475sq.m Government Land

Zoning: "Res (Group A)"

Applied Development: 2 Towers – 1.050 (900) Units / PR 9.0 / 144Mpd (144) / OS 58.44sq.m / 116 car 14 Large Vehicle Parking / 1 Tower Commercial / Retail

Dear TPB Members,

Strong objections to yet another underhand manoeuvre on the part of the URA to undermine the focus of genuine urban development. The administration has repeatedly pledged that its planning focus is to reduce density in mature urban districts. But every URA development undergoes a substantial increase in the number of units.

To justify this URA mentions MiC. However, MiC does not inherently increase the number of units, it merely speeds up the construction time. In addition, it limits the layout of these units to a very uniform pattern. The apartments will be 16.7% smaller than previously promised. This is alarming as the development provides no internal Open Space facilities.

See attached 2021 objections. Moreover the local children's playground, above the MTR station is already saturated. It is clearly not large enough for the current population.

And then there is the issue of the reduced site size. The original dimension was 6,590sq.m. How all the promised facilities can be provided on this smaller footprint has not been mentioned.

Instead of any improvement in the living standards and average space per person, the URA is developing units that are smaller than those they replaced and adding to the density of the district.

Members have a duty to demand an explanation on the discrepancies. The financial problems of the URA should not be justification to replicate the conditions that this body was appointed to resolve.

Mary Mulvihill

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From: [REDACTED]

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

Date: Thursday, 9 September 2021 11:36 PM HKT

Subject: URA TO KWA WAN ROAD/WING KWONG STREET DSP NO. S/K9/URA3/1

DRAFT URA TO KWA WAN ROAD/WING KWONG STREET DEVELOPMENT SCHEME PLAN NO. S/K9/URA3/1

Dear TPB Members,

The DSP for To Kwa Wan Road/Wing Kwong Street covers an area of about 0.66ha. The site is intended for accommodating two residential towers over a 5-storey podium, a low-rise retail/commercial block with **an all-weathered communal space** and a basement car park.

The area of the Scheme is shown by Plan No. URA/KC-016 and covers an area of about 6,590sq.m.. The area is currently zoned "Res (Group A)" and the streets and pavement shown as "Road" on the Approved Hung Hom Outline Zoning Plan (OZP) No. S/K9/26. Under the draft DSP, the scheme is proposed to be zoned as "R(A)", with a maximum building height of 140mPD.

So while it is not actually set out in the paper, the presumption is that the exercise is to incorporate the public roads into the site and zone it in its entirety to Res A. This is of course not about public convenience but a ploy to increase PR. Note no breakdown is given of the GFA of the public roads to be expunged. No mention of PR but appears to be under 8, bringing it into line with "no new development, or addition, alteration and/or modification to or redevelopment of an existing building shall result in the plot ratio for the building upon development and/or redevelopment in excess of 7.5 for a domestic building or 9.0 for a building that is partly domestic and partly non-domestic"

In the absence of any MLP or indication as to the layout, members of the public can only comment on the little information provided:

4. Proposed Development

4.1 Under a "planning-led" and "district-based" approach, the Scheme aims to restructure and re-plan the existing land uses and road network through Redevelopment (R1) initiatives **to enhance walkability and connectivity**. With the proposed inclusion of three road sections within the Scheme, i.e. Yuk Shing Street, part of Hung Fook Street and part of Kai Ming Street, for redevelopment and/or **provision of pedestrian walkways and communal space**, the Scheme will create a car-free zone to provide a safe and pleasant walking environment. The traffic road network will be re-routed to lead to a more effective traffic circulation. The proposed pedestrian and traffic network in the Scheme will be integrated with the planned pedestrian walkways and 4 communal space in the neighbouring URA redevelopment projects to enhance the connectivity with all directions in the neighbourhood, including north-south direction and east-west direction.

4.2 **An all-weathered communal space** is proposed in the Scheme to create a focal point for community gathering and place-making opportunities. It will provide **sitting area and landscaping**, and will be connected with the adjoining pedestrian walkways and retail shops to bring in vibrancy.

SO EFFECTIVELY NOTHING MORE THAN CORRIDORS AND ALLEYS. THIS IS LEE TUNG STREET ALL OVER AGAIN BASICALLY A PEDESTRIAN RETAIL ENVIRONMENT WITH A FEW SEATS HERE AND THERE. AT LEE TUNG THE OPEN SPACE IS HIDDEN ON A DIFFICULT TO

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LOCATE ROOF TOP AND IS DECORATIVE ONLY. FOR THIS DEVELOPMENT THE COMMUNITY SPACE WILL BE UNDERGROUN OR UNDERCOVER.

NOTE THERE IS NO MENTION OF OPEN SPACE BUT FOR AN ESTIMATED 900 UNITS IT SHOULD BE AT LEAST 2,000SQ.M. NO ACTIVE RECREATIONAL FACILITIES, CHILDREN'S PLAY AREA OR EXERCISE EQUIPMENT FOR THE GROWING NUMBER OF ELDERLY. NO MENTION OF TREE PLANTING, ETC

The district has a deficit of LOCAL OS. No HKPSG data provided with the OZP.

4.3 To bring more planning gains to the area, the Scheme will provide not less than 5,500 sq.m. non-domestic GFA for Government, Institution or Community (GIC) uses.

CANNOT COMMENT AS NO DETAILS PROVIDED

4.4 Under the current notional design, the Scheme comprises **two residential towers on top of commercial / retail / GIC podia, a low-rise commercial/retail block with an all weathered communal space underneath**. An ancillary basement carpark will be provided for the proposed development. The Scheme may also include other facilities and uses as required or approved by the TPB.

SEE ABOVE RE OS AND COMMERCIAL FOCUS. NOTE THAT THE INCORPORATION OF PUBLIC ROADS IS SIMILAR TO A NEARBY DEVELOPMENT BUT AT LEAST SOME OF THAT SITE IS RETURNED TO THE COMMUNITY

Kau Pui Lung Road/Chi Kiang Street Development Scheme

There will be a piazza and communal open space in CBS-2:KC integrated with the pedestrian walkway to provide the community **with open spaces for different uses**

4.5 Located in the close proximity to MTR Tuen Ma Line To Kwa Wan Station exits, the Scheme provides a valuable **opportunity to bridge up** and create a direct and safe pedestrian connection between To Kwa Wan MTR Station and the wider residential neighbourhood adjoining the Scheme. To capture the opportunity, a footbridge connection is proposed at the podium of the Scheme to facilitate the possible development of a footbridge connecting to the Ma Tau Wai Road/To Kwa Wan Road Garden (LCSD Garden) where the To Kwa Wan MTR station exits are situated.

AND HERE WE FIND THE TRUE FOCUS OF URA, TAKE PEOPLE OFF THE STREETS AND BET THEM ONTO FOOTBRIDGES'. OBLIBERATE ALL FORM OF AT GRADE OS – THE CE SAID AS MUCH IN A RECENT ARTICLE ON YAU MONG DEVELOPMENT

While the URA has finally been forced to engage in the provision of affordable housing, its core focus is on the commercial podium. TPB members must bear in mind that in most cases it retains ownership and has built up a portfolio over the years. This is in line with its ambition to be the next Link Reit.

Over the years members of the public have provided proof of the many URA developments, like those in Central and MKK, where the finished development has all but excluded the promised public amenities. It is your duty to ensure this does not happen again.

Mary Mulvihill

Recommended Advisory Clauses

- (a) to note the comments of the Chief Estate Surveyor/Urban Renewal Section, Lands Department (LandsD) that:
 - (i) should the approved planning application result in changes to any conditions of the private treaty grant approved by the District Lands Conference/Kowloon, the applicant shall make separate submission to LandsD for the relevant amendments. LandsD would process such amendments in the capacity of a landlord and it will be subject to such terms and conditions as considered appropriate.
- (b) to note the comments of the Director of Fire Services that:
 - (i) detailed fire services requirements will be formulated upon receipt of a formal submission of Short Term Tenancy/ Short Term Waiver, general building plans or 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.