

MPC Paper No. A/K9/282
For Consideration by
the Metro Planning Committee
on 15.3.2024

APPLICATION FOR PERMISSION
UNDER SECTION 16 OF THE TOWN PLANNING ORDINANCE

APPLICATION NO. A/K9/282

- Applicant** : Sino China Enterprises Limited represented by KTA Planning Limited
- Site** : 8 Hung Luen Road, Hung Hom, Kowloon
- Site Area** : About 20,364m²
- Lease** (a) Kowloon Inland Lot (KIL) No. 11110 (the Lot) held under Conditions of Sale No. 12599 for a term of 50 years commencing from 13.8.2001 as varied by Modification Letter dated 8.12.2003.
- (b) Shall not be used for any purpose other than for non-industrial (excluding private residential, godown and petrol filling station) purposes.
- Plan** : Approved Hung Hom Outline Zoning Plan (OZP) No. S/K9/28
- Zoning** : “Commercial (2)” (“C(2)”)
- Subject to a maximum gross floor area (GFA) of 107,444m² and a maximum building height (BH) ranging from a maximum of 30mPD at the southern part of the site to a maximum of 55mPD at the northern part of the site, or the height of the existing building, whichever is the greater. A ‘stepped height’ building profile is required.
- Application** : Proposed Wholesale Conversion of the Existing Hotel for Flat and Permitted Shop and Services, Eating Place and Place of Recreation, Sports or Culture Uses and a new Basement Carpark

1. The Proposal

- 1.1 The applicant seeks planning permission for proposed flat and permitted shop and services, eating place and place of recreation, sports or culture uses by wholesale conversion of the current hotel and building a new ancillary basement carpark at 8 Hung Luen Road, Hung Hom (the Site) facing Hung Hom Bay (**Plan A-1**). The Site is zoned “C(2)” on the approved Hung Hom OZP No. S/K9/28. According to the Notes of the OZP, ‘Flat’ is a Column 2 use which requires planning permission from the Town Planning Board (the Board), whilst ‘Shop and Services’, ‘Eating Place’ and ‘Place of Recreation, Sports or Culture’ uses are always permitted.

Hotel Development at the Site

1.2 Completed in 2006, the hotel (known as Harbourfront Horizon All-suite Hotel) at the Site comprises five hotel towers aligned in an E-shape configuration (**Drawing A-1**), having a total 1,662 guestrooms. Towers B and D (both of 19 storeys) are hotel towers with the lower two storeys at G/F and 1/F (referred by the applicant as L1 and L2) for commercial uses (i.e. shops and restaurants). The other towers, namely, Towers A, C, and E (all of 11 to 19 storeys) are pure hotel towers with the G/F for lobbies and E&M facilities. All the towers have an interconnected basement for E&M facilities, hotel facilities, back-of-house (BOH) and refuse collection room (RCP) for the hotel. The hotel carpark and loading and unloading (L/UL) areas are mainly provided at the G/F open-air portion bounded by Towers C, D and E (the eastern portion). An open-air swimming pool is provided at the G/F bounded by Towers A, B and C (the western portion).

The Proposed Scheme (Drawings A-1, A2a to 2o and 3a to 3c)

1.3 The proposals involve converting all guestroom floors to flats. The two-storey commercial floors at Towers B and D will be converted to largely a covered landscaped area (for residential use), a small shop and a commercial gymnasium and sports facility¹. The interconnected basement under the five towers is converted for E&M mainly, a commercial gymnasium and sports facility¹, and a RCP. The open-air hotel carpark is turned to a lawn with ramps to a new 3-storey basement carpark underneath at the eastern portion. The swimming pool will be kept unchanged and reserved for residential use. The built form and height will remain unchanged. A comparison table between the current and proposed uses by floors is provided in **Appendix II**.

1.4 A comparison of the major development parameters between the existing hotel and the proposed scheme are summarized below.

Development Parameters	Existing Hotel ^{Note 1}	Proposed Scheme	Differences
Site Area (about)	20,364m ²		-
Uses	‘Hotel’ and Commercial Uses	‘Flat’ and Commercial Uses and ‘Place of recreation, sports or culture’	‘Flat’ and ‘Place of recreation, sports or culture’ uses
PR (about)	5.28	5.0	-0.28 (-5.3%)
Domestic	0	4.9	
Non-domestic	5.28	0.1	
GFA (m ²) (about)(PR)	107,442.902	101,691	-5,752 (-5.4%)
Domestic	0	99,665	+99,665
Non-domestic	107,442.902	2,026	-105,417 (-98.1%)
- Hotel	- 101,660.572 ^{Note 2}	- 0	-101,661
- Commercial uses	- 5,782.33	- 2,026	-3,757 (-65.0%)

¹ According to the applicant, the utilization of these facilities will be solely under commercial consideration by future tenant(s) of the commercial facility.

Site Coverage (SC) (about)				
<i>Below 15m</i>	47.62%	47.929% ^{Note 3}		+0.31% (+0.65%)
<i>Towers (over 15m)</i>	36.95%	37%		-
BH (at main roof level)				
<i>20m from southern boundary</i>		38.6mPD ^{Note 4}		-
<i>Remaining area</i>		59.4mPD ^{Note 4}		-
Number of Storeys	20	20	-	-
<i>Hotel/Residential Towers</i>	19	19	-	-
<i>Basement</i>	1	1	3 (New basement carpark)	
Number of Blocks (above ground)		5		-
Number of Units/Rooms				
<i>Flat</i>	0	1,665		-
<i>Hotel</i>	1,662	0		-
Average Room/Flat Size (m²) (about)	61 ^{Note 5}	61		-
Estimated Population (about)	-	4,662 ^{Note 6}		-
Private Open Space (m²)	-	Note less than 4,662		-
Ancillary Parking Provision				
Private Car Parking Spaces	21 (G/F)	389 (G/F & Basement)		+368
<i>Hotel</i>	17	0		-17
<i>Commercial</i>	2	14		+12
<i>Residential</i>	-	350 ^{Note 7}		+350
<i>Visitor</i>	-	25		+25
Motorcycle Parking Spaces	1 (G/F)	19 (G/F & Basement)		+18
<i>Hotel</i>	1	0		-1
<i>Commercial</i>	0	2		+2
<i>Residential</i>	-	17		+17
<i>Visitor</i>	-	0		-
L/UL Space and Lay-by	25 (G/F)	8 (G/F)		-17
<i>Goods Vehicle for Hotel</i>	17	0		-17
<i>Goods Vehicle for Commercial</i>	1	3		+2
<i>Goods Vehicle for Residential</i>	-	5		+5
<i>Private Car and Taxi</i>	4	0		-4
<i>Single Deck Tour Bus</i>	3	0		-3

Notes:

1. The development parameters of the hotel were extracted from the set of general building plans approved by the Building Authority (BA) on 28.9.2022 submitted by the applicant in **Appendix Ig**.
2. Exclude hotel BOH GFA of 3,419.632m².
3. The total SC (under 15m) is increased to 47.929% (including 8.166% domestic SC and 39.763% non-domestic SC) due to the addition of structures for the new basement carpark.
4. On 31.5.2002, the Metro Planning Committee (the Committee) of the Board approved with conditions a planning application (No. A/K9/163) for minor relaxation of BH restrictions for hotel development at the Site. The maximum BHs of main roofs in the area within 20m from the southern boundary of the Site and the remaining area has been relaxed to 38.6mPD and 59.4mPD respectively (**Drawings A-1 and 3b**). Details of the previous application are in paragraph 5 below. The current hotel was built as accordance with the approved scheme.
5. Estimated based on the existing hotel GFA and number of hotel guestrooms.
6. Assume 2.8 persons per flat.
7. Including parking spaces to be provided on mechanical car parking system on B3/F.

1.5 According to the Landscape Master Plan (LMP) and Tree Preservation Proposal, the existing landscape will be adequately reused to minimize impacts on the existing trees as far as possible (**Drawing A-4a**). Moreover, at-grade covered landscape areas (including sitting-out areas community garden and children's play area) will be provided at Towers B and D for residents' use (**Drawing A-4b**). There are 165 and 122 existing trees within and outside the Site respectively. The proposed scheme will not affect the trees outside the Site. 14 trees (8%) affected by works at the eastern portion are proposed to be transplanted within the Site and 46 trees (28%) are proposed to be felled. The new tree planting proposal within the Site shall compensate for the 46 felled trees with good quality heavy standard and large palm trees representing a replanting ratio of 1:1 (new tree planted : trees felled). The main entrance at the southeastern corner of the Site and three pedestrian access points at the southwestern corner and along the southern boundary of the Site will be maintained to provide waterfront accesses for future residents² (**Drawing A-4a**). A total of not less than 4,662m² of open space³ will be provided for the proposed residential use in accordance with the requirement as set out in the Hong Kong Planning Standards and Guidelines (HKPSG).

1.6 In support of the application, the applicant has submitted the following documents:

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|-----|--|--------------------------|
| (a) | Application form received on 24.5.2023 | (Appendix I) |
| (b) | Supporting Planning Statement received on 24.5.2023 | (Appendix Ia) @ |
| (c) | Further Information (FI) received on 4.7.2023*(1 st FI) | (Appendix Ib) @ |
| (d) | FI received on 11.8.2023* (2 nd FI) | (Appendix Ic) @ |
| (e) | FI received on 12.9.2023* (3 rd FI) | (Appendix Id) @ |
| (f) | FI received on 27.10.2023* (4 th FI) | (Appendix Ie) @ |
| (g) | FI received on 13.12.2023 and 19.12.2023* (5 th FI) | (Appendix If) @ |
| (h) | FI received on 2.2.2024* (6 th FI) | (Appendix Ig) @ |
| (i) | FI received on 1.3.2024 including consolidated submission of Items (b) to (h) (7 th FI) | (Appendix Ih) @ |

* Not exempted from publication and recounting requirement

Exempted from publication and recounting requirement

@ In hard copy and separately sent to Members. The submission is available for public inspection at the Planning Enquiry Counters of the Planning Department (PlanD) in North Point and Sha Tin.

² Although the applicant claimed that the pedestrian access points along the southern boundary are newly proposed, it is noted that these pedestrian access points are shown on the the set of general building plans approved by the BA on 15.11.2005.

³ Provision of uncovered private open space is shown on Figure 6.1 in the LMP in **Appendix Ih**.

2. Justifications from the Applicant

The justifications put forth by the applicant in support of the application are detailed in the planning statement and FIs at **Appendices I to Ih** respectively. They are summarised as follows:

Government Policies

- (a) The Proposed Scheme will contribute to the immediate provision of about 1,665 flats for sale in about three to four years, which is in line with the Government policies on increasing housing land supply and promoting home ownership. Three similar approved applications (Nos. Y/MOS/6, Y/TWW/7 and A/TSW/77) involving wholesale conversion of existing hotels for 'Flat' use in Ma On Shan, Ting Kau and Tin Shui Wai respectively also demonstrated the practicability and viability of this development option for increasing housing supply.

Tourism Planning for Hung Hom Waterfront Area

- (b) The Site and the adjacent "C(3)" site at Hung Hom waterfront area are intended to serve as hotel nodes extended from Tsim Sha Tsui (TST) East. However, being separated by the Hung Hom MTR Freight Yard which is occupied by the Hung Hom Stabling Siding, the opportunity for the creation of a leisure/tourism node and a continuous waterfront promenade at the Hung Hom waterfront area with an "oceanic and shipping theme" as recommended under the Hung Hom District Study and the Tourism Plan in the Planning Study on the Harbour and its Waterfront Areas have never been realized. Moreover, the importance of Hung Hom Station as a major transport hub in Hong Kong has been gradually diminished since the opening of the Guangzhou-Shenzhen-Hong Kong Express Rail Link in West Kowloon Station in 2018. In this connection, the intended function of the Site as hotel node extended from TST East is also diminishing.
- (c) Furthermore, there are eight licensed hotels and one planned hotel development providing a total of about 5,263 hotel guestrooms⁴ in Hung Hom area and 55 licensed hotels providing a total of about 16,000 hotel guestrooms in TST area. Despite the proposed conversion of hotel guestrooms at the Site for residential use, there would still be sufficient supply of hotel guestrooms offering a wide range of accommodations for overnight visitors in Hung Hom and nearby TST areas to meet the demand during the anticipated recovery of tourism industry in Hong Kong.

Land Use Compatibility

- (d) The Site is located at the fringe of the large residential areas in Hung Hom and Whampoa and can be seen as part of the residential cluster. It is in close proximity to Hung Hom/TST Promenade and the planned open space at Kin Wan Street (**Plan A-1**) and is well-served by various modes of public transportation and existing 'Government, Institution or Community' ('G/IC') facilities including schools and

⁴ Including 1,980 rooms provided in the Harbourview Horizon All-suite Hotel to the north of the Site at Hung Lok Road (**Plan A-1**) which is the subject of planning application (No. A/K9/284) for proposed conversion of the existing hotel for hotel mixed residential use, which is scheduled for consideration by the Committee on 19.4.2024.

Tai Wan Shan Swimming Pool. Besides, various similar planning applications in other OZPs were previously approved by the Board, which demonstrated that 'Flat' use is a suitable and compatible use at commercial sites with the support of various technical assessments.

Harbourfront Planning Principles & Development Intensity

- (e) According to Explanatory Statement (ES) of the OZP, with a view to help preserving views to ridgelines, descending BH restrictions are imposed on various zonings including the "C" zones to achieve a stepped height profile for visual permeability, wind penetration and circulation, and maintain a more intertwined relationship with the Victoria Harbour edge. Such planning principles are also in line with the Harbour Planning Principles. The hotel at the Site was constructed with stepped building height in response to the ES and the Harbourfront Planning Principles. The proposed scheme only involves internal conversion of the hotel to residential use without changing the building height nor the building bulk of the building. The proposed retail and dining facilities at the Site will enhance the liveliness and vibrancy of the waterfront area and bring diversity in land uses to offer opportunities for on-street pedestrian activities to add life and vitality to the harbour.

Technical Feasibility

- (f) On air quality, a computer modeling was conducted in the Air Quality Impact Assessment (AQIA) to assess the possible air quality impact to the proposed development. The AQIA concluded that all selected air sensitive receivers (ASRs) at all predicted levels of the proposed development, including the residential buildings, swimming pool and the fresh air intake locations of gymnasium and sport facilities will comply with the Hong Kong Air Quality Objectives. Dust control requirements in the Air Pollution Control (Construction Dust) Regulation will also be followed and relevant mitigation measures for dust emissions will be implemented. Thus, adverse air quality impacts associated with the proposed development during construction phase are not anticipated.
- (g) On traffic, additional carparking spaces would be provided in the new basement carpark to meet the HKPSG requirements on ancillary carparking provisions and the carparking provisions can achieve about 91% of the high-end provision of the HKPSG. According to the Traffic Impact Assessment (TIA), although the proposed conversion from hotel to residential use will induce additional traffic volume in AM peak hour, the junction capacity assessment shows that all relevant junctions will operate with capacity under the design scenario (i.e. the proposed residential development can be operated by 2025). The TIA concludes that proposed conversion of hotel to residential use at the Site will not induce adverse traffic impact on adjacent road network.
- (h) Other technical assessments, including Noise Impact Assessment (NIA), and Sewerage Impact Assessment (SIA), have been conducted by the applicant to demonstrate the proposed conversion is technically feasible and adverse noise and sewerage impacts are not anticipated.

3. Compliance with the “Owner’s Consent/Notification” Requirements

The applicant is the sole “current land owner”. Detailed information would be deposited at the meeting for Members’ inspection.

4. Background

- 4.1 The Site is located within the Hung Hom Bay Reclamation Area (HHBRA) (**Plan A-1**). The reclamation of HHBRA, completed in 1990s, aimed to provide land for the extension of the hotel/office developments in TST East, residential developments, open space and GIC facilities to help redress the shortfall of such facilities in Hung Hom. On the HHBRA, the sites along Hung Luen Road at the waterfront (i.e. the Site currently zoned “C(2)” and One Harbour Gate and Kerry Hotel Hong Kong currently zoned “C(7)” and “OU(Hotel)1” respectively on the OZP) were planned mainly for commercial, hotel/service apartment uses to capitalise on the advantages of harbour views. Another commercial site to the east of Princess Margaret Road Link (PMRL), i.e. the Harbourview Horizon All-suite Hotel currently zoned “C(3)”, has been reserved for office use with the incorporation of a multi-storey public car/lorry park, which acts as noise shield from noise impacts for the residential, educational and open space developments to the east of PMRL.
- 4.2 The Site and the abovementioned commercial sites were designated to serve as an office and hotel node extended from TST East and ‘Flat’ use/residential development was not permitted at these sites since 2000. The Site was sold for commercial development in 2001 and a hotel was developed in 2006. Subsequently in 2021, amendments were proposed to be made to the Notes of the OZP for the “C” zone to include ‘Flat’ use in Column 2 of all sub-zones of “C” zone to allow flexibility for planning application for ‘Flat’ use in line with the Master Schedule of Notes to Statutory Plans for “C” zone. The draft OZP with the proposed amendments was later approved by in 2022.

5. Previous Application

The Site is the subject of a previous application (No. A/K9/163), which was submitted by the same applicant for minor relaxation of BH restrictions for hotel development without increase in development intensity. The application was approved by the Committee on 31.5.2002 and the BH restrictions at the Site were relaxed to 38.6mPD within 20m from the southern boundary of the Site and 59.4mPD at the remaining area. The main grounds of approving the application were that the ‘stepped height’ concept was maintained; the proposed increases in BHs for the provision of more openings on G/F for better integration of the private and public open spaces were considered not unreasonable; and the resultant BH would unlikely to protrude into 20% building free zone of the mountain backdrops of the area.

6. Similar Applications

- 6.1 There is a similar application (No. A/K9/284) for proposed conversion of a hotel cum public vehicle park development (known as Harbourview Horizon All-suite Hotel with 1,980 hotel guestrooms, which is one of the licensed hotel mentioned in paragraph 2(c) above) for hotel mixed residential cum public vehicle park use to provide 546 hotel guestrooms and 1,375 flats within the “C(3)” zone on the Hung Hom OZP at the waterfront (**Plan A-1**). The application is scheduled for consideration by the Committee on 19.4.2024.
- 6.2 There were three similar applications involving wholesale conversion of existing hotels for ‘Flat’ use approved by the Rural and New Town Planning Committee (RNTPC) of the Board or the Committee between 2021 and 2022. Two were for proposed rezoning of the application sites (Nos. Y/MOS/6 and Y/TWW/7) from “Other Specified Uses” annotated “Hotel” to “Residential (Group A)12” on the Ma On Shan OZP and from “Comprehensive Development Area (1)”, “Green Belt” and area shown as ‘Road’ to “Residential (Group B)2” on the Tsuen Wan West OZP and another application no. A/TSW/77 was in “C” zone on the Tin Shui Wai OZP. The main grounds for approving the applications were that the proposed wholesale conversion of existing hotels for flat use were considered not incompatible with the surrounding residential use; there was no change to the existing building bulk and development intensity; and the proposals would not result in insurmountable impacts.

7. The Site and Its Surrounding Areas (Plans A-1 to A-2, aerial and site photos on Plans A-3 to A-5)

- 7.1 The Site is:
- (a) currently occupied by a licensed hotel at the TST Promenade bounded by the flyovers of Hung Hom Bypass at the north;
 - (b) is secluded from major roads or developments, and is accessible from Kin Wan Street (a slip road of Hung Luen Road) at the road end; and
 - (c) the current uses by floors are provided in **Appendix II**.
- 7.2 The surrounding areas have the following characteristics:
- (a) TST Promenade and the Kin Wan Street Park (under construction for completion by 2024-25) are along the southern and eastern boundaries. Relevant upgrading works of existing facilities at the promenade are currently in progress for completion by 2024-25. The TST Promenade is connected to the Hung Hom Promenade and Hung Hom Urban Park to the east (currently under construction with its Phase 1 recently opened in February 2024);

- (b) office and hotel developments (One Harbour Gate and Kerry Hotel Hong Kong) and two ferry piers providing ferry services to North Point and Central are along the promenade;
- (c) Hung Hom MTR Station and Freight Yard with comprehensive development of residential, hotel (known as Harbour Plaza Metropolis) and commercial uses, the Hong Kong Coliseum and a temporary MTRCL site office are to the northwest and west. According to the Policy Address 2023, the MTRCL is invited to conduct a preliminary study and submit proposals the following year (i.e. 2024) to re-plan and develop the MTR Station and Freight Yard areas and the Hung Hom Coliseum to release commercial and residential floor area, and create a vibrant harbourfront. The Government will also explore ways to enhance pedestrian connectivity between Hung Hom and TST East; and
- (d) Drainage Services Department (DSD) Hung Hom Bay Sewage Pumping Station and a hotel development (known as Harbourfront Horizon All-suite Hotel) which is the subject of a planning application (No. A/K9/284) scheduled to be consideration by the Committee on 19.4.2024 are at the north across Hung Hom Bypass. The existing residential neighbourhood in Hung Hom, including Royal Peninsula, Harbour Place and Whampoa Garden, is to the further north and east.

8. Planning Intention

The Site has been zoned “C” since 1998. “C” zone is intended primarily for commercial developments, which may include uses such as office, shop, services, place of entertainment, eating place and hotel, functioning as territorial business/financial centres and regional or district commercial/shopping centres. These areas are usually major employment nodes.

9. Comments from Relevant Government Bureaux/Departments

- 9.1 The following Government bureaux/departments (B/Ds) have been consulted and their views on the application are summarised as follows:

Harbour Planning

- 9.1.1 Comments of the Commissioner for Harbourfront, Development Bureau (C for Harbourfront, DevB):
- (a) No comment from harbourfront planning perspective.
 - (b) The subject application has been circulated to members of Task Force on Harbourfront Developments in Kowloon, Tsuen Wan and Kwai Tsing (Task Force). In response to a member’s comments, the applicant provided supplementary information regarding the tentative completion date of the future Kin Wan Street Park and the

pedestrian connectivity between the Site and the waterfront promenade (**Drawing A-4a**). No further comment was received.

Tourism Planning

9.1.2 Comments of the Commissioner for Tourism (C for Tourism):

- (a) No objection to the application. In anticipation of continuous recovery of inbound tourism with time, he expects there will be increasing demand for tourism-related facilities. While he notes that the hotel under application is located in the Hung Hom waterfront area, the operation of hotels is a matter of commercial decision regardless of their locations and it would be up to hotel owner/operators to decide whether or not to continue their business. He would defer to relevant B/Ds to take a macro view and weigh among competing demands.
- (b) The COVID-19 pandemic since early 2020 had seriously affected Hong Kong's tourism industry, leading to a steep fall in the number of visitor arrivals and bringing about an unprecedented challenge to the hotel sector. Following full resumption of normal travel between Hong Kong and the rest of the world since February 2023, overnight visitor arrivals surged from 0.57 million in 2022 to 17.2 million in 2023. The number of overnight arrivals reach 2.0 million in December 2023, returning to 71% of the averages of the same months in 2017 and 2018. Hotel occupancy rate likewise rose to 82% in 2023.

Land Administration

9.1.3 Comments of the District Lands Officer/Kowloon West, Lands Department (DLO/KW, LandsD):

- (a) The Site falls within KIL No. 11110 (the Lot) which is held under Conditions of Sale No. 12599 (the Conditions) for a term of 50 years commencing from 13.8.2001 as varied by Modification Letter dated 8.12.2003. The Lot or any part thereof or any building or buildings erected or to be erected thereon shall not be used for any purpose other than for non-industrial (excluding private residential, godown and petrol filling station) purposes. The proposed conversion comprising, inter alias, residential flat units will constitute a breach of the user restriction under the Conditions.
- (b) If the planning application is approved by the Board, the lot owner is required to apply to LandsD for a lease modification to implement the proposal. However, there is no guarantee that the application will be approved. Such application, if received, will be considered by LandsD acting in the capacity as a landlord at its sole discretion. If the application is approved, it will be subject to such terms and conditions including, among others, the payment of premium and

administrative fee as may be imposed by LandsD.

Building Matters

9.1.4 Comments of the Chief Building Surveyor/Kowloon, BD (CBS/K, BD):

No objection in principle to the application subject to his detailed comments in **Appendix III**.

Traffic

9.1.5 Comments of the Commissioner for Transport (C for T):

- (a) No adverse comment on the proposal having considered the submitted TIA which includes assessments on existing traffic vehicular and pedestrian conditions and public transport facilities; the proposed parking provisions at the Site are close to the high-end requirements under the HKPSG; and, the applicant has agreed to explore the feasibility to provide more parking spaces at the detailed design stage.
- (b) Should the application be approved, approval conditions for the submission of a revised TIA and the design and provision of parking spaces, L/UL and lay-by facilities are suggested to be imposed.

Environment

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

- (a) No in-principle objection to the application as insurmountable environmental impact associated with the proposed development is not anticipated. His detailed comments are in **Appendix III**.
- (b) Should the application be approved, approval conditions are suggested to be imposed to ensure the potential noise and sewerage impact associated with the proposed development would be properly addressed.

Urban Design, Visual and Landscaping

9.1.7 Comments of the Chief Town Planner/Urban Design and Landscape, Planning Department (CTP/UD&L, PlanD):

Urban Design and Visual

- (a) The Site is situated at the southwestern fringe of an area predominantly characterized by residential developments, intermixed with hotel developments and open spaces. The proposed scheme does not involve any change to the existing BH nor the overall building bulk. The proposed development is unlikely to

induce any significant adverse effects on the visual character of the surrounding townscape.

- (b) As gathered from the submissions, landscape edge treatments and lawn areas are introduced on L1/F (**Drawing A-4b**) and roof gardens are provided at various locations on L2/F, L12/F, L15/F and L19/F to L22/F (**Drawing A-4a**). These measures may contribute to the improvement of streetscape by softening the building edges and promoting visual interest and pedestrian comfort.

Landscape

- (c) Having reviewed the revised Tree Preservation Proposal, 165 trees were identified within the Site and no Old Valuable Trees (OVT) and rare/protected species were found at the Site. 105 are proposed to be retained, 14 trees to be transplanted within the Site and 46 trees of common species to be felled. Not less than 46 new trees are proposed to be planted under the proposed scheme. Significant adverse landscape impact on existing landscape resources arising from the proposed scheme is not anticipated.
- (d) The applicant is reminded that approval of the application under Town Planning Ordinance does not imply approval of the site coverage of greenery requirements under PNAP APP-152 and/or under the lease. The site coverage of greenery calculation should be submitted separately to BD for approval. Similarly for any tree preservation/removal/compensation scheme, the applicant shall approach relevant authority/Government department(s) direct to obtain the necessary approval for any tree works, where appropriate.

9.1.8 Comments of the Director Leisure and Cultural Services (DLCS):

- (a) The Site is adjacent to TST Promenade (the venue) which is under the management of LCSD. The construction works at the Site cannot affect the operation of the venue. No facilities, including passive and active facilities as well as trees, inside the venue shall be affected.
- (b) Since the venue is carrying out upgrading works under the project of Open Space at Hung Hom Waterfront until Q4 2024, the applicant should note the landscape of the venue will be different from the existing condition after the completion of the upgrading works in 2024. In planning for the pedestrian access points at the proposed development along the waterfront promenade, the applicant is advised to consult LCSD where necessary.

9.2 The following Government B/Ds have no objection to or no adverse comment on the application:

- (a) Principal Assistant Secretary (Planning and Lands) 2, DevB;
- (b) Chief Highway Engineer/Kowloon, Highways Department;
- (c) Chief Engineer/Mainland South, DSD (CE/MS, DSD);
- (d) Chief Engineer/Construction, Water Supplies Department;
- (e) Chief Architect/Advisory and Statutory Compliance, Architectural Services Department;
- (f) Director of Fire Services (D of FS);
- (g) Director of Food and Environmental Hygiene;
- (h) Director of Marine;
- (i) Chief Engineer/Port Works, Civil Engineering and Development Department (CE/PW, CEDD)
- (j) Head of the Geotechnical Engineering Office, CEDD;
- (k) District Officer (Yau Tsim Mong), Home Affairs Department; and
- (l) Commissioner of Police.

10. Public Comments Received During Statutory Publication Periods

10.1 On 2.6.2023, 11.7.2023, 18.8.2023, 22.9.2023, 3.11.2023, 29.12.2023 and 9.2.2024, the application and the FIs were published for public inspections. During the statutory public inspection periods, seven public comments, including five objecting comments (**Appendix IVa**) and two comments providing views (**Appendix IVb**).

10.2 The major views of the public comments are summarized as follow:

5 comments expressing objections (from an individual) (Appendix IVa)

- (a) The applicant is not buying “Happy Hong Kong” story as it has plans to liquidate all his Horizon Suite properties.
- (b) Housing supply is not only about home purchase but is for providing accommodation for both residents and long term visitors. The Site, with 1,200 suites and being close to transport node, is a source of supply for rental accommodation which is important in a city so dependent on trade. The approval of the application will result in significant loss of affordable rental accommodation options in the market and increase in rental price due to removal of large pool of rental units at the same time. Besides, there are considerable amount of housing supply for sale on the market or coming soon in nearby Kai Tak and To Kwa Wan. The proposed conversion would reduce the supply of hotel guestrooms and rental accommodation to serve visitors traveling for work, imported workers under numerous programmes and students, and to meet the demand for visitors attending future events to be hosted at nearby attractions such as the Kai Tak Stadium. To approve the application would indicate a failure on the part of the administration to ensure that its policies are supported by the various services that are required for a favorable outcome.

- (c) The building at the Site is already aging, with rising interest rates and substantial discounts on new developments, it is anticipated that a portion of the flats at the Site will remain empty for years. Besides, the building lifespan of the proposed development is much shorter than those of the newly built estates.
- (d) The proposed scheme involves excavating of the current lawn area to provide additional basement carpark. However, there is no change in the open space component within the Site.

2 providing views (from two individuals) (Appendix IVb):

- (e) The Board should consider carefully the consequences of the proposed change of land use from commercial to residential.
- (f) According to the Air Ventilation Assessment conducted for the Hung Hom area previously considered by the Committee on 22.2.2008, Hung Hom South Road is a main wind corridor and BH of developments at the waterfront area, including the Site should be as low as possible. The Board should take this opportunity to request the applicant to reduce the current BH which created air ventilation and visual impacts to inland developments and relocate half of the private open space within the Site to adjoin the future Kin Wan Street Park to improve air ventilation and wind penetration.
- (g) The current building volume (both the height and width) and design (with swimming pool, private open space and landscape areas enclosed by buildings) severely affect the waterfront landscape. The Board should request the applicant to reduce the width of the building blocks by locating private open space/green zone along the eastern and western boundaries of the Site to promote visual enjoyment to pedestrians and public.
- (h) The provision of more than 1,600 residential flats at the Site will heavily aggravate the local traffic load. The Board should consider inviting a third party expert to conduct a more detailed traffic and environmental assessments or inviting Transport Department to assess the capacity of local public transport provisions (especially minibus services).

11. Planning Considerations and Assessments

- 11.1 The application is to seek planning permission for proposed wholesale conversion of a hotel development for residential use and permitted commercial and place of recreation, sports or cultural uses and building a new ancillary basement carpark at the Site zoned "C(2)". According to the applicant, as the proposed scheme only involves internal conversion works within the existing building and excavation works at the eastern portion of the Site for the basement carpark, the GFA is reshuffled into about 98% domestic (99,665m²) and 2% non-domestic (2,026 m²) uses, resulting in an equivalent domestic and non-domestic PR of 4.9 and 0.1.

Planning Intention, Land Use and Development Intensity

- 11.2 The Site is a waterfront site of the HHBRA. It is situated in a transitional area of the commercial TST East to its west and the Hung Hom residential neighbourhood to its north and west. In early 2000s, the Site and waterfront area of the HHBRA are disposed of and developed as hotel and office node intended for under the OZP. The inland parts of the HHBRA have been so developed progressively into a commercial, residential and GIC. In recent years, there are plans to redevelop the MTR Freight Yard site, which has waterfrontage, for commercial and residential uses. As the circumstance evolves, the proposed conversion for residential use at the Site is not incompatible with the changing character of the surrounding area. In terms of intensity, the new basement carpark is ancillary in nature and proposal does not involve any additional floorspace above ground.
- 11.3 Notwithstanding the proposed conversion, there is still a total supply of over 15,000 hotel guestrooms in TST. In addition, there are three planned hotels at Cheong Tung Road (within “C” zone) and Wuhu Street (under previous approved planning applications) in Hung Hom close to the established or new transport nodes in recent years providing new or potential supply of about 1,000 hotel rooms. C for Tourism considers the operation of hotel a matter of commercial decision and has no objection to the application.

Urban Design, Visual and Landscaping

- 11.4 The proposed scheme does not involve any change to the existing BH nor the overall building bulk. The stepped building height profile will be retained. To integrate the Site with the waterfront promenade, four pedestrian access points are provided at the southwestern corner and along the southern boundary in addition to the main entrance at the southeastern corner of the Site (**Drawing A-4a**). The applicant proposes to utilise the landscape resources at the Site as far as possible and provides landscaped roofs at various floors to soften the building edges. 119 trees (72%) at the Site will be retained or transplanted within the Site and 112 trees outside the Site will not be affected. The 46 felled trees (28%) are of common species and will be compensated with good quality heavy standard and large palm trees within the Site in a 1:1 replanting ratio. C for Harbourfront has no comment on the application and CTP/UD&L, PlanD considers that the landscape proposals may contribute to the improvement of streetscape, promote visual interest and pedestrian comfort and significant adverse landscape impact is not anticipated.

Other Technical Aspects

- 11.5 The proposed ancillary basement carpark with mechanical car parking system to accommodate more than 300 car parking spaces is close to the high-end provision requirements under the HKPSG. The TIA also concludes that the proposed conversion of hotel to residential use will not induce adverse traffic impact onto the adjacent road networks and C for T has no adverse comment on the application subject to conditions as detailed in paragraph 12.2(a) and 12.2(b) below.

- 11.6 In view of the potential air pollutants and noise emission from the adjacent trunk road and vessels, the applicant has conducted assessments on air quality and noise impacts. The submitted AQIA has confirmed that all selected ASRs at all predicted levels of the proposed development complies with the Hong Kong Air Quality Objectives. The submitted NIA and SIA also demonstrated that adverse noise and sewerage impacts are not anticipated. DEP has no in-principle objection to the application subject to conditions as detailed in paragraph 12.2(c) to 12.2(e) below.
- 11.7 As there will be no change in existing built form and height, the proposal will not induce changes or additional impact on the local air ventilation. Other concerned government departments, including CBS/K of BD, CE/MS of DSD, D of FS, CE/PW, CEDD and DLCS have no objection to/adverse comment on the application.

Similar Applications

- 11.8 Three applications in Ma On Shan, Ting Kau and Tin Shui Wai mentioned by the applicant all involving wholesale conversion of existing hotels for 'Flat' use are dissimilar to the subject application in terms of locations, site characteristics and land use context, the planning assessment of this case has been set out in paragraphs above.

Public Comments

- 11.9 Regarding the public comments on hotel guestrooms and rental housing supply, potential adverse traffic, visual and environmental impacts, the Government B/Ds' comments and planning assessment in the paragraphs 11.2 to 11.8 above are relevant.

12. Planning Department's Views

- 12.1 Based on the assessments made in paragraph 11 above and having taken into account the public comments mentioned in paragraph 10, the Planning Department has no objection to the application.
- 12.2 Should the Committee decide to approve the application, it is suggested that the permission shall be valid until 15.3.2028, and after the said date, the permission shall cease to have effect unless before the said date, the development permitted is commenced or the permission is renewed. The following conditions of approval and advisory clauses are also suggested for Members' reference:

Approval Conditions

- (a) the submission of a revised Traffic Impact Assessment to the satisfaction of the Commissioner for Transport or of the Town Planning Board;
- (b) the design and provision of parking spaces, loading/unloading and lay-by facilities to the satisfaction of the Commissioner for Transport or of the Town Planning Board;

- (c) the submission of a revised Noise Impact Assessment and implementation of the noise measures identified therein for the proposed development to the satisfaction of the Director of Environmental Protection or of the Town Planning Board;
- (d) the submission of a revised Sewerage Impact Assessment to the satisfaction of the Director of the Environmental Protection or of the Town Planning Board; and
- (e) the implementation of the local sewerage upgrading/sewerage connection works identified in the Sewerage Impact Assessment in condition (d) above to the satisfaction of the Director of Drainage Services or of the Town Planning Board.

Advisory Clauses

The recommended advisory clauses are attached at **Appendix V**.

- 12.3 Alternatively, should the Committee decide to reject the application, the following reason for rejection is suggested for Members' reference:

the proposed development is not in line with the planning intention of the "C" zone and there is no strong planning justification in the submission for a departure from the planning intention of the "C" zone.

13. Decision Sought

- 13.1 The Committee is invited to consider the application and decide whether to grant or refuse to grant permission.
- 13.2 Should the Committee decide to approve the application, Members are invited to consider the approval condition(s) and advisory clause(s), if any, to be attached to the permission, and the date when the validity of the permission should expire.
- 13.3 Alternatively, should the Committee decide to reject the application, Members are invited to advise what reason(s) for rejection should be given to the applicant.

14. Attachments

Appendix I	Application form received on 24.5.2023
Appendix Ia	Supporting Planning Statement received on 24.5.2023
Appendix Ib	Further Information (FI) 1 received on 4.7.2023
Appendix Ic	FI 2 received on 11.8.2023
Appendix Id	FI 3 received on 12.9.2023
Appendix Ie	FI 4 received on 27.10.2023
Appendix If	FI 5 received on 13.12.2023 and 19.12.2023
Appendix Ig	FI 6 received on 2.2.2024
Appendix Ih	FI 7 received on 1.3.2024
Appendix II	Comparison of floor uses between the existing and proposed developments
Appendix III	Detailed departmental comments
Appendix IV	Public comments received
Appendix V	Recommended advisory clauses
Drawing A-1	Master Layout Plan submitted by the applicant
Drawings A-2a to 2o	Comparison of floor plans between the existing and proposed developments submitted by the applicant
Drawings A-3a to 3c	Comparison of section plans between the existing and proposed developments submitted by the applicant
Drawings A-4a to 4b	Landscape master plans submitted by the applicant
Plan A-1	Location Plan
Plan A-2	Site Plan
Plan A-3	Aerial Photo
Plans A-4 and A-5	Site Photos

**PLANNING DEPARTMENT
MARCH 2024**