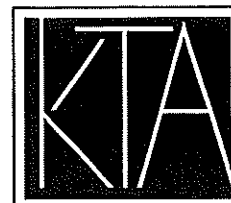


By Hand and Email

Our Ref: S3082a/107\_WYS/24/010Lg

24 March 2025

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



PLANNING LIMITED  
規劃顧問有限公司

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Dear Sir/Madam,

**Proposed Rezoning of the Site from “Other Specified Uses” annotated “Business”  
to “Other Specified Uses” annotated “Residential Care Home for the Elderly and Hotel”  
for a Proposed Composite Development with Residential Care Homes for the Elderly  
and Hotel at Nos. 107 – 109 Wai Yip Street, Kwun Tong  
- S12A Amendment of Plan Application -  
(TPB Ref.: Y/K14S/4)  
Further Information No. 2**

Reference is made to the captioned S12A Planning Application submitted to the Town Planning Board (“TPB”) on 11 December 2024 and the comments received from various Government Departments via emails from the Kowloon District Planning Office in February and March 2025.

In response to the departmental comments received, please find attached 4 hard copies of the Further Information (“F.I.”) submission. The submission document consists of:

Response-to-Comment Table

- Appendix I Updated Landscape Drawings
- Appendix II Replacement Pages of the Visual Impact Assessment
- Appendix III Revised Traffic Impact Assessment
- Appendix IV Revised Sewerage Impact Assessment
- Appendix V Revised Environmental Assessment
- Appendix VI Replacement Pages of the Supporting Planning Statement

Should you have any queries in relation to the above, please do not hesitate to contact the undersigned at 3426 8840 or Mr Wilson Man at 3426 3830.

Thank you for your kind attention.

Yours faithfully

For and on behalf of

KTA PLANNING LIMITED

Gladys Ng

cc. KDPO – Ms Charlotte Ng (By email)  
the Applicant & Team

GN/MM/vy



FS 579819



**Proposed Rezoning of the Site from “Other Specified Uses” annotated “Business” to “Other Specified Uses” annotated “Residential Care Home for the Elderly and Hotel”  
for a Proposed Composite Development with RCHE and Hotel  
at Nos. 107 – 109 Wai Yip Street, Kwun Tong  
(Planning Application No. Y/K14S/4)**

## **Response-to-Comment Table**

Proposed Rezoning of the Site from “Other Specified Uses” annotated “Business” to “Other Specified Uses” annotated “Residential Care Home for the Elderly and Hotel”  
for a Proposed Composite Development with RCHE and Hotel  
at Nos. 107 – 109 Wai Yip Street, Kwun Tong

(Planning Application No. Y/K14S/4)

Comments	Summary & Response/Action
<p><b><u>Comments from Kowloon District Planning Office, Planning Department:</u></b> <b>(Contact Person: Ms Charlotte NG, Tel: 2231 4970)</b></p> <p><u>General comments:</u></p> <ol style="list-style-type: none"> <li>Noting that BOH facilities, which might be eligible for GFA exemption, have been taken into account when conducting technical assessments, upon reviewing the submitted technical assessments, including the revised SIA, the assumed area remains 4,856m<sup>2</sup>, which is the same as the total floor area as designated for hotel use. Please clarify and demonstrate your claim that BOH has been considered in the building bulk for all submitted technical assessments.</li> <li>Please clarify if the RCHE and hotel would be operated by the same or separate operators.</li> </ol>	<p>The SIA has adopted The Commercial and Industrial Floor Space Utilization Survey (CIFSUS) conducted by the Planning Department as well as Environmental Protection Department’s (EPD’s) Guidelines for Estimating Sewage Flows for Sewage Infrastructure Planning, Version 1 (GESF) in calculating the sewage flow from the Proposed Development. The consultant prepared the SIA based on the no. of staff to be employed in the Proposed Development within the GFA of the hotel (i.e. 4,856m<sup>2</sup>), disregarding areas that is assigned for BOH. As such, the ‘worst-case scenario’ has already been taken into account in the assessment.</p> <p>With regard to the building bulk, as the floor area that might be eligible for GFA exemption is relatively small, this shall not have major impact to the proposed building bulk as shown in the Indicative Development Scheme. The Applicant will ensure the future development parameters shall adhere to the development restrictions stipulated in the future OZP.</p> <p>Please note that the RCHE and hotel would be operated by separate operators.</p>

**Proposed Rezoning of the Site from “Other Specified Uses” annotated “Business” to “Other Specified Uses” annotated “Residential Care Home for the Elderly and Hotel”  
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**(Planning Application No. Y/K14S/4)**

Comments	Summary & Response/Action
<p>3. While you clarified the two sets of lift will serve their respective uses with the submission of revised floor plans, please ensure the floor plans in the landscape proposal are updated accordingly to ensure consistency.</p>	<p>The landscape proposal has been updated to tally with the latest layout plan (<i>Appendix I</i> refers).</p>
<p>4. Please clarify if the entire 1/F to 3/F are designated for RCHE only.</p>	<p>Please note that 1/F to 3/F are designated for RCHE only.</p>
<p><b>Traffic Impact Assessment</b></p>	
<p>5. Regarding Table 4.2 for major/planned and committed development in the vicinity of the Site, the list is generally in order, except Item 20 regarding the proposed mixed use development at the Kwun Tong Town Centre. The consultant has adopted a total commercial GFA of 268,300m<sup>2</sup> [should be not more than 153,700m<sup>2</sup> under URA’s submission], while the planned development involves residential use [of not more than 110,100m<sup>2</sup> for 1,750 residential units] and GIC facilities [17,200m<sup>2</sup>]. I defer to the Transport Department to consider if your adaptation of KTTC project is acceptable. In this connection, please refer to TD’s comments below.</p>	<p>Noted, please refer to the response to comment from Transport Department item 1.</p>
<p>6. Please clarify the vehicular ingress/egress are designated at Wai Yip Street and the back alley.</p>	<p>Vehicular access at Wai Yip Street is the major access of the Proposed Development. The back alley would be a minor ingress/egress of LGV, ambulance, taxi and private cars.</p>
<p>7. R to-C (VIA-VP4) Item 7 – According to our record, no BPs submission for building works for Darton Tower has been received over the past 2 years. Please clarify or revised accordingly.</p>	<p>Please note that the former Darton Tower (8 Yan Yip Street) has been demolished and the site is currently used by Hong Kong Baptist Hospital East Kowloon Medical Centre with occupation permit (No. KN58/2024/OP) issued in December 2024 (<i>Appendix II</i> refers).</p>

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**(Planning Application No. Y/K14S/4)**

Comments	Summary & Response/Action
<p>8. According to the Drawing No. SK-7B, it is noted that the balcony approach and the protected lobby connecting to corridor with balcony approach are proposed, please clarify whether the corridor with balcony approach is open. Please also provide an elevation to illustrate the concept of the balcony approach on the RCHE typical floor.</p> <p>9. According to the Drawings No. SK-7B and SK-9, it is noted that the escape staircases are widened on the RCHE floors only, and the footprint of the escape staircases on the Hotel floors is smaller. Since the escape staircases are connecting all RCHE floors and Hotel floors, please explain how does it work</p>	<p>The corridor with balcony approach is open to a side above protective barrier.</p> <p>Subject to later detail design stage for shifted/cranked structural elements, the required staircase for hotel floors (which is narrower) will connect to the wider staircase for RCHE floors.</p>
<p><b><u>Comments from Transport Department:</u></b> <b>(Contact Person: Mr Tom LAW, Tel: 2399 2459)</b></p> <p>1. With regards to your remark for the proposed mixed use development at the Kwun Tong Town Centre (Item 20 in Table 4.2)(‘The Item’), an update to the development parameters for the Item is deemed necessary for the estimated traffic flows in the TOA under a worst-case scenario. In this regard, the parameters for the Item should be GFA of 65,000m<sup>2</sup> for commercial, 127,619m<sup>2</sup> for office and 8,601m<sup>2</sup> for GIC.</p>	<p>It is noted that the approved TPB Ref: A/K14/819 for Area 4 and 5 of Kwun Tong Town Centre has GFA of 65,000m<sup>2</sup> for commercial, 127,619m<sup>2</sup> for office and 8,601m<sup>2</sup> for GIC is a worst-case scenario, and this scheme has already been adopted in our TIA. Nevertheless, the breakdown of GFA for this scheme is now shown in our updated Table 4.2 of the TIA in <i>Appendix III</i>.</p>

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(Planning Application No. Y/K14S/4)

Comments	Summary & Response/Action
<p><b><u>Comments from Environmental Protection Department:</u></b> <b>(Contact Person: Ms Jolitta CHAN, Tel: 2835 1112)</b></p>	
<p>1. Main Text Table 2.1 and Appendix 2.1 Table 1 - The previous comment has not been fully addressed and recapped below. “Private Commercials” refer to retail premises and other premises designed or adapted for commercial use, therefore adopting the planned usage type as “Private Commercials” in this case might not be appropriate, please review. Mitigation measures should be provided to the surcharged sewer sections where applicable.</p>	<p>The Applicant estimated and advised the potential number of employees with the Proposed Development and the consultant has adopted this in the revised calculation. Please refer to Appendix 2.2 of the revised SIA in <i>Appendix IV</i> for the correspondence from the Applicant.</p>
<p>2. Figure 2.2 - The previous comment has not been addressed: Please review the legend for Catchment A, S2 should be referring to FMH404<u>2</u>669 instead of FMH404<u>3</u>669.</p>	<p>Noted, the legend of figure 2.2 has been revised accordingly.</p>
<p>3. Figure 2.2 - Please provide the ID number for each sewage sub-catchment in the layout plan, for ease of reference.</p>	<p>ID number for each sewage sub-catchment has been added in Figure 2.2 (<i>Appendix IV</i> refers).</p>
<p>4. Appendix 2.1 Table 3a &amp; 3b – Catchment A - Please clarify and provide reference to show that the assumed areas of Catchment A-2, A-5 &amp; A-6 are reduced.</p>	<p>Noted, references have been added to Appendix 2.1 Table 3a and 3b. The assumed areas of Catchment A-2, A-5 and A-6 were extracted from the approved SIA report of A/K14/809.</p>
<p>5. Appendix 2.1 Table 3a &amp; 3b – Catchment D - Please review if there is any sewage generation from Lai Yip Street RCP.</p>	<p>The flow from the RCP is from general floor washing which is anticipated to be minimal and has been added to Catchment D.</p>

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Comments	Summary & Response/Action
<p><b><u>Air Quality</u></b></p> <ol style="list-style-type: none"> <li>1. Section 2.2: Please also supplement the discussion of “Air Pollution Control (Fuel Restriction) Regulations (i.e. using liquid fuel with a sulphur content of less than 0.005% by weight)”.</li> <li>2. Table 2.1: Please note the column title should be “No. of Exceedances Allowed per <b>Calendar</b> Year”. Please revise.</li> <li>3. Table 2.3 and Table 2.4: The data which exceeds AQOs are only bold but not underlined. Please revise Note [1].</li> <li>4. Figure 2.1: The representative ASRs should be identified as the nearest point to the proposed development. Please add a point to the respective ASR locations accordingly.</li> </ol>	<p>Discussion has been supplemented in Section 2.2.6 (<i>Appendix V</i> refers).</p> <p>Noted, the text has been revised accordingly.</p> <p>The data which exceeds AQOs have been bold and underlined.</p> <p>Figure 2.1 has been revised.</p>
<p><b><u>Comments from Urban Design and Landscape Section, Planning Department:</u></b> <b>(Contact Person: Ms Rachel YIU, Tel: 3565 3944)</b></p> <p><b><u>SPS</u></b></p> <ol style="list-style-type: none"> <li>1. Para. 5.1.3 – The Consultant should confirm if the last sentence “Hence, there would be negligible and slight impact in the visual aspect” is for VP6. If affirmative, this sentence should be removed to tally with the VIA and avoid confusion.</li> </ol> <p><b><u>VIA</u></b></p> <ol style="list-style-type: none"> <li>2. Re. R-to-C (P.14), Items 8(a) and 8(b), VP6, Photomontage – Despite the Consultant’s responses, it does not seem that the BHs of</li> </ol>	<p>Para. 5.1.3 of the supporting planning statement has been revised accordingly to tally with the VIA (<i>Appendix VI</i> refers).</p> <p>The photomontage on VP6 has been revised (<i>Appendix II</i> refers).</p>

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(Planning Application No. Y/K14S/4)

Comments	Summary & Response/Action
<p>the proposed development at 115mPD and the surrounding approved applications have been revised. Our previous comment is still valid and the level of the line indicating BHR of 100mPD also seems to be underestimated. The Consultant should confirm whether the BHs of the proposed development and surrounding approved applications and the indication of 100mPD have been accurately reflected in the photomontage.</p>	
<p><b><u>Comments from Drainage Services Department:</u></b> <b>(Contact Person: Ms Afra SIU, Tel: 2300 1585)</b></p> <ol style="list-style-type: none"> <li>1. RtC Item 1.3 remains valid, which was not properly addressed yet. Please further review and respond, especially regarding the proposed site formation level for such development at lowlying coastal area.</li> <li>2. RtC Item 6: Section 2.4 Table 2.1 (2. Hotel) - Please note that SIG/EPD's view and agreement shall be sought for adopting the most suitable worker density.</li> <li>3. Please supplement your SIA calculations in Excel format for review.</li> </ol>	<p>Flood barriers, e.g. demountable flood barriers or portable flood barrier, can be installed manually in front of the entrances of the building and carpark as resilience measures to control and reduce flood risks.</p> <p>The Applicant estimated and advised the potential number of employees with the Proposed Development and the consultant has adopted this in the revised calculation. Please refer to Appendix 2.2 of the revised SIA in <i>Appendix IV</i> for the correspondence from the Applicant.</p> <p>Noted.</p>
<p><b><u>Comments from Energizing Kowloon East Office:</u></b> <b>(Contact Person: Ms Natalie Chan, Tel: 3904 1321)</b></p> <ol style="list-style-type: none"> <li>1. The proposal for rezoning the site for RCHE and hotel uses only will definitely deviate the original planning intention of “OU(B)” zone</li> </ol>	<p>The Site has been idled for years. The high vacancy rate of offices and the large amount of new supply in the near future encouraged the Applicant to reconsider the best way of utilising the Site. Instead of offices, the</p>



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**(Planning Application No. Y/K14S/4)**

Comments	Summary & Response/Action
<p>of the site which is primarily for general business uses, we have reservation on the application.</p> <p>2. As the current proposal will inevitably reduce supply of commercial floor space in the Kwun Tong Business Area and impose more restrictions on the uses always permitted within the application site. The current proposal if approved may set a precedent case in the locality, thus its impact in respect of sustaining the Kwun Tong Business Area will have to be duly assessed.</p>	<p>proposed RCHE use would provide much-needed social welfare facility to the society.</p> <p>The Financial Secretary said the following in the 2025-26 Budget,</p> <p>“In view of the <b>high vacancy rates of offices</b> in recent years and the <b>relatively ample supply</b> in the next few years, the Government will not roll out any commercial site for sale in the coming year to <b>allow the market to absorb the existing supply</b>. We will also consider rezoning some of the commercial sites into residential use and <b>allowing greater flexibility of land use.</b>”</p> <p>Despite the notable downward trend in occupancy rates of offices in the Kwun Tong Business Area, there will be about 1.5 million square meters of potential office supply to enter the market, which has taken into account the approved planning applications and Action Areas in Kwun Tong (391,080m<sup>2</sup>) and Kowloon Bay (65,300m<sup>2</sup>). Considering the ample (perhaps excess) supply of commercial floor space, rezoning the Application Site for RCHE use should not be considered posing an adverse impact in terms of commercial floor space. In fact, the rezoning application aligns with the direction of the 2025-26 Budget.</p> <p>In light of the deficit of about 1,021 RCHE bed spaces provision in the K14S planning area, the Applicant is committed to addressing this pressing need by providing additional RCHE beds through the Proposed Development at a site that has been idled for years.</p>

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(Planning Application No. Y/K14S/4)

Comments	Summary & Response/Action
<p>3. The site of 105 Wai Yip Street is mainly used to accommodate Hong Kong Baptist Hospital (HKBH)’s administrative supporting office use, while the HKBH East Kowloon Medical Centre is located at 8 Yan Yip Street.</p>	<p>Noted.</p>
<p><b><u>Comments from Social Welfare Department:</u></b> <b>(Contact Person: Mr Michael Pang, Tel: 2116 5939)</b></p> <p>1. To our understanding, the Home will provide not less than 302 bed spaces and not more than 557 bed spaces. Please clarify the meaning of "combination of types of RCHE Care and Attention Homes places".</p> <p>As stated in the diagram for typical room layout on page 15, a single-bed room and a double-bed room are provided. It seems that the double-bed room design is for two persons, but there is no gap between them. Normally, electric hospital beds with adjustable hi-lo positions would be provided for meeting the caring needs of the elderly residents living in care and attention home. Please review if your proposed double-bed design is suitable for RCHE residents who require daily care by staff.</p> <p>2. For the isolation rooms to be placed on 5/F, 8/F, 12/F &amp; 17/F, please confirm whether openable window could be provided for complying with the requirement of natural lighting and ventilation in habitation area.</p> <p>In view that some of the dormitory rooms and isolation rooms are located at more than 24m above the ground, the applicants shall</p>	<p>The operators shall make the final decision on the level of service to be provided within the Proposed Development.</p> <p>The interior layout and furniture design will be considered at detailed design stage.</p> <p>The RCHE shall comply to related requirements stipulated in the Code of Practice for Residential Care Homes (Elderly Person) and to be reviewed by relevant Government departments at detailed design stage.</p>

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<p>prove that all the essential fire safety requirements as stated in the Code of Practice for Residential Care Homes (Elderly Person) June 2024 (Revised Edition) could be complied.</p> <p>3. Please note that the number of staff should comply with the requirement as stated in the latest version of Code of Practice for Residential Care Home (Elderly Persons).</p> <p>4. It is imperative that the applicant must address the additional requirements related to building fire safety design and fire safety management for the Residential Care Home for the Elderly (RCHE) as outlined in Annex 5.1 to Code of Practice for Residential Care Homes (Elderly Persons). The above provisions shall be examined comprehensively during formal license application and the prerequisite approving stage concerning building fire safety. Meanwhile, we would like to highlight that meeting these requirements, though essential, does not solely determine the outcome of the application process.</p> <p>5. It is observed that the floor to floor height for most of the RCHE portion is 3150mm. The applicant should take note that the ceiling (the ceiling structure or suspended false ceiling) of every room must be situated at a height not less than 2.5m measuring vertically from the floor or not less than 2.3m measuring vertically from the floor to the underside according to Para. 4.4.3 of the Code of Practice for Residential Care Homes (Elderly Persons). Hence, the applicant should ensure that sufficient headroom buffer has to be provided in order to comply with all related height requirement.</p>	<p>Noted.</p> <p>The applicant is dedicated to comply with the additional requirements related to building fire safety design and fire safety management for the Residential Care Home for the Elderly (RCHE) as outlined in Annex 5.1 to Code of Practice for Residential Care Homes (Elderly Persons) in the detailed design stage.</p> <p>Noted, sufficient headroom would be provided subject to later structural design and selection of building services installations.</p>

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**(Planning Application No. Y/K14S/4)**

Comments	Summary & Response/Action
6. It is observed in 3/F layout plan that "Water feature", "Spa", "Cafe", "Gym/Physio", "Podium roof", "Meeting / Multi-purpose room", "Clinic" etc, are maked as area designated for RCHE. Please clarify whether these areas are exclusively used by the residents of the RCHE.	These areas are exclusively used by the residents of the RCHE.

Consolidated by: **KTA Planning Limited**

Date: **21 March 2025**

**List of Appendices**

- Appendix I** Updated Landscape Drawings
- Appendix II** Replacement Pages of the Visual Impact Assessment
- Appendix III** Revised Traffic Impact Assessment
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