



香港城市設計學會
Hong Kong Institute of Urban Design

Reference Number: PAC/22/007
2 November 2022
Plan No.: S/K3/35
Name of Plan: Mong Kok
Town Planning Board

Re: HKIUD's Comments on the Yau Mong Representation

The Planning Department has put forth a draft Mong Kok Outline Zoning Plan No. S/K3/35 to the Town Planning Board on 22 July 2022 and that five representations were received during the public consultation period. We support some of the arguments put forth by Representor R1 and Representor R2.

We noted that this proposed amendment is to pave way for the urban renewal of the Yau Mong district with measures such as relaxation of building height restriction for "C" zones along the 2 sides of Nathan Road, rezoning of an area near Prince Edward Road West and Sai Yee Street from R(A) to OU"MU", relaxation of building height of certain R zones and relaxation of Plot Ratio(PR) from 7.5 to 8.5 of certain R zones.

Catalyst for Yau Mong Urban Renewal

The aging problem of building stocks in Yau Mong is serious and the proposed relaxation in building height and plot ratio restrictions will provide financial incentive for redevelopment, especially in the case of Yau Mong as many building stocks have been developed up to the maximum allowed intensity. Whilst the relaxation in height and PR restrictions will provide the catalyst to growth and renewal and the proposed PR is not excessive, the government does need to justify if the infrastructure is sufficient to serve the increase in population and traffic.

Technical Assessments Required for PR and Building Height Increase

Whilst we in general welcome such a scale of relaxation in height and plot ratio restrictions, we remind that air ventilation assessment shall be conducted for checking if the proposed will induce significant adverse impact to street level air movements. Besides, we have reservations to the blanket relaxation of the height restriction proposal. Vibrant cityscape can only be attained with building height variation. Thus, VIA may also be required. Traffic impact assessment shall also be conducted to see if the increase in population thus traffic will have significant impacts on the already very congested local street traffic condition of the district.

Mixed-use Zoning is welcomed

We also welcome mixed-use zoning in the urban core area. Mixed-use developments can induce vibrancy and allow short commuting thus less burden on street traffic.

Uphold Comprehensive Urban Renewal Approach

We noted that the height and plot ratio restriction relaxation is aimed to allow comprehensive urban renewal of the district, however, when the proposed relaxations are enacted,

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individual owners of some small building blocks may take advantage and redevelop their buildings individually. The government may need to instigate measures to reduce impacts from individualized redevelopments which may undermine the society's desire to have holistic area-based approach to retrofit this decaying urban area.

Reminders

We would also like to take this opportunity to remind the following:-

1. The government shall take lead in planning and instigate urban renewal of the entire district. Putting the burden entirely on the shoulder of URA is grossly insufficient. Upgrading of the streetscape, recreational areas, GIC facilities, transportation facilities and means (e.g. rationalisation of bus lines and instigation of central car parking facilities) can only be led and done by the government.
2. The Transport Department(TD) shall take an openminded approach in establishing car park ratio. As we learned from URA and lanD's proposal on Yau Mong renewal, mixed-use are to be encouraged allowing possibility of short commuting and, thus, less demand on carparking spaces. TD should not insist on the high end car parking ratio but rather adopt the low end ratio. Further reduction shall be allowed for developments nearer to MTR lines and public transport terminus or interchange. TD shall also take lead to study satellite centralized car parks for reducing traffic into the core area. This should be accompanied with pedestrianization study. For urban renewal, simply putting all the carparking responsibility to URA or the future project proponents will bring disastrous effects to the local traffic.
3. Transfer of Plot Ratio (TRP) and Site Consolidation Area (SCA) – We noted that URA is proposing TRP and SCA mechanisms in their Yau Mong urban renewal study. TRP and SCA may be innovative mechanisms but it will exacerbate the up zoning magnitude put forth in this OZP amendment. Therefore, for allowing TRP or SCA, the future project proponents or URA shall not only warrant that infrastructure capacities are not severely compromised but also that the proposals have good urban design merits and shall demonstrate that there are public gains along the process.

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