

06 October 2021

Chairman and Members

Town Planning Board

15/F, North Point Government Offices

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**Renewal of Planning Approval for Temporary Eating Place (Restaurant) for a Period of 2 Years
(Application No. A/K1/261)**

Dear Chairman and Members,

Designing Hong Kong Limited **objects** the captioned for the following reasons:

- The proposed area is zoned as “**Government, Institution or Community**” (GIC). The planning intention of this zone is primarily for the provision of Government, institution and community facilities serving the needs of the local residents and/or a wider district, region or the territory. It is also intended to provide land for uses directly related to or in support of the work of the Government, organizations providing social services to meet community needs, and other institutional establishments.
- This is the third time that the planning application for a temporary eating place is submitted a planning application to the Town Planning Board at the same site since 2016. It has to be noted that members from the Town Planning Board had a clear agreement that **the Scout Association of Hong Kong (SAHK) has the duty to seek suitable social services to be provided at this site.**
- In the 571st Metro Planning Committee Meeting on 9 December 2016¹, some members agreed and supported the suggestion the approving the application on a temporary basis, to “**examine the possibility of allocating the subject premises to other NGOs or social enterprises for other GIC uses**”. The application was approved by the Board on a temporary basis for a period of 3 years as there were no alternative GIC uses at the premises were identified at that moment.
- In the 637th Metro Planning Committee Meeting on 18 October 2019², a member showed his disappointment to the applicant and proposed rejecting the application due to the failure of addressing the concern raised upon approving the previous application. The Committee decided to grant approval on a temporary basis again “**on a sympathetic consideration so as the allow time for SAHK to identify suitable uses for the Premises during the period**”³. The Committee also made an additional clause that “*the applicant should explore the possibility of accommodating*

¹ Minutes of the 571st Meeting of the Metro Planning Committee held at 9:00 a.m. on 9.12.2016

https://www.info.gov.hk/tpb/en/meetings/MPC/Minutes/m571mpc_e.pdf

² Minutes of the 637th Meeting of the Metro Planning Committee held at 9:00 a.m. on 18.10.2019

https://www.info.gov.hk/tpb/en/meetings/MPC/Minutes/m637mpc_e.pdf

³ Minutes of the 1218th Meeting of the Town Planning Board held on 13.3.2020

https://www.info.gov.hk/tpb/en/meetings/TPB/Minutes/m1218tpb_e.pdf

other government, institution or community uses at the application premises and no further renewal of approval would be given”.

- The same application had submitted to the Board again two years after the approval of the previous approval. **There is no justification or proof that the SAHK had tried their best to identify the suitable GIC use for the Premise.** It also showed the SAHK has failed to address and respond to Committee’s concern and therefore the renewal should not be approved.
- The applicant claims there is “*rare alternative use at basement*” and “*the basement is not preferable for social welfare facilities*” in the supporting planning statement, however, these statements are misleading. According to the *Approved Tsim Sha Tsui Outline Zoning Plan No. S/K1/28*, social welfare facility is only one of the numerous uses that are always permitted under the GIC zone. Various uses can be taken up the place and benefit the community and society. Besides, earlier this year, the Government submitted a planning application (Application No. A/H5/416) to the Town Planning Board and proposed to rebuild the Lockhart Road Playground which includes a covered multi-purpose activities area, lavatories and children play area in the basement. It shows that **various community facilities can also fit in the basement to serve the community.**
- The previous study also shows that **there is a deficit of community facilities in Tsim Sha Tsui.** In the *Pilot Study on Underground Space Development in Selected Strategic Urban Areas* by the Civil Engineering and Development Department (CEDD) and Planning Department (PlanD) in 2016⁴, it states that “**there is a lack of spaces to accommodate additional community facilities to serve the increasing population**”. After the stage 2 public engagement⁵, the Departments proposed to develop the underground space in Tsim Sha Tsui to “**create space for additional community facilities to meet community demand**”. It reveals that the government has a plan to increase the community services and facilities underground in Tsim Sha Tsui.
- The proposed site is **adjacent to the proposed underground development with a convenient transportation connection.** While the underground space study is still ongoing, it is foreseeable additional space for community use will not be increased in coming years. We believe the basement of the Hong Kong Scout Centre is the perfect location to provide additional community facilities to meet the community demand in near future.
- The government or the owner may consider setting up a community hall at the proposed site in response to the shortage of such facilities in the Yau Tsim Mong District. The Home Affairs Department has two community halls named Henry G. Leong Yaumatei Community Centre and Mong Kok Community Hall. The Yau Tsim Mong District Council had requested to build a new community hall since 2012⁶ and nothing has been done so far. With the high occupancy rate of the mentioned community halls (Figure 1-4), there is a great demand for having a third

⁴ Pilot Study on Underground Space Development in Selected Strategic Urban Areas. Stage 1 Public Engagement Digest https://www.urbanunderground.gov.hk/files/docs/stage1_digest.pdf

⁵ Pilot Study on Underground Space Development in Selected Strategic Urban Areas. Stage 2 Public Engagement Digest https://www.urbanunderground.gov.hk/files/docs/Stage2_Digest.pdf

⁶ Minutes of the 3rd Meeting of the Community Building Committee, Yau Tsim Mong District Council (2012-2015) https://www.districtcouncils.gov.hk/ytm/doc/2012_2015/tc/committee_meetings_minutes/CBC/CBC_Minutes_3rd_7.6.2_012_C.pdf

community hall in the district. The location of the Hong Kong Scout Centre can serve the residents in Tsim Sha Tsui and Jordan where community hall is missing in the area.

- The Government had also set up a community hall in the basement previously in Wan Chai. The Wan Chai Activities Centre opened in 2011 is located in the basement under the Wan Chai Market. Setting up these community facilities underground is practical and benefit the resident nearby.
- As mentioned by the Members in the 1218th Town Planning Board Meeting, even though the site might not be suitable for an elderly centre, *“there was scope to provide other types of GIC facilities or services in it, including that could serve a wider district or region. Given the Premises’ convenient location in Tsim Sha Tsui, it was highly unlikely that no other organisation was interested in using the Premises to provide community services”*. The convenient location can benefit not only the resident in Tsim Sha Tsui and Jordan but also a wider district. The income and benefit gained by the applicant of operating a restaurant **shall not be overriding the general needs of community services of the residents and general public**.
- It should be noted that the Town Planning Board and PlanD’s duties are to formulate, monitor and review the urban planning issues in Hong Kong, and to focus on reserving sufficient land in meeting various development needs. **It was not in position to determine the planning application from a business operation perspective taking into account the ups and downs of economic cycles**.
- Currently, a significant portion of the floor space of the Hong Kong Scout Centre was already used for guesthouses rather than community services, and the restaurant use is also not required to support the work of SAHK in providing social services. As a major and leading NGO in Hong Kong, the SAHK has the responsibility to provide more community services and facilities in their premises at the heart of Hong Kong, so as to meet its social mission and people’s expectation.
- The approval of the application does not in line with the planning intention of the “GIC” zone. As there are insufficient community facilities in the area, providing those facilities and services at the proposed site would be the immediate way to provide relevant services and solve the problem.

Here we submit our concerns for your consideration.

Yours,
Designing Hong Kong Limited

Figure 1: Booking Situation of Multi-purpose Hall at Henry G. Leong YMT Community Centre in November 2021 (Retrieved on 5 October 2021)

Balloting Result / Booking Situation of Multi-purpose Hall at Henry G. Leong YMT Community Centre																	
梁顯利油麻地社區中心 多用途禮堂抽籤結果 / 租用情況																	
MONTH / YEAR 月份 / 年份					十一月-21												
	Timeslots unavailable for booking 暫停開放時段						Timeslots booked 已被租用時段						Timeslots available for booking 可供租用時段				
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Figure 2: Booking Situation of Hall at Mong Kok Community Hall in November 2021
(Retrieved on 5 October 2021)

Balloting Result / Booking Situation of Hall at Mongkok Community Hall														
旺角社區會堂 禮堂 抽籤結果 / 租用情況														
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Figure 3: Booking Situation of Multi-purpose Hall at Henry G. Leong YMT Community Centre in December 2021 (Retrieved on 5 October 2021)

Balloting Result / Booking Situation of Multi-purpose Hall at Henry G. Leong YMT Community Centre 梁顯利油麻地社區中心 多用途禮堂抽籤結果 / 租用情況														
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Figure 4: Booking Situation of Hall at Mong Kok Community Hall in December 2021
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Balloting Result / Booking Situation of Hall at Mongkok Community Hall 旺角社區會堂 禮堂 抽籤結果 / 租用情況														
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