

Detailed Comments of Government Departments

1. Commissioner for Transport (C for T):

- (a) it is a general planning principle and an overall intention of the Hong Kong Planning Standards and Guidelines (HKPSG) to ensure that, except in special circumstances, future commercial developments should have sufficient on-site parking and L/UL facilities to match manifest operational requirements;
- (b) the proposed redevelopment locates at the core commercial area and aims at developing into a new landmark retail/commercial development. Concerns/comments on the shortfall of provision of car parking spaces and L/UL facilities in meeting the HKPSG requirements were conveyed to the Authorized Person (AP) via. BD's letter dated 3.9.2018 when the AP submitted their major revision of the General Building Plans from a 4-level basement redevelopment to a 3-level basement redevelopment;
- (c) the former Excelsior Hotel utilized the vehicular access at Jaffe Road for its L/UL vehicles. This section of Jaffe Road at the southwestern corner of the Site is a highly congested dead-ended road. Manoeuvring of vehicles is difficult. Traffic condition was even worsened in the past from the L/UL vehicles using the vehicular access through Jaffe Road. It is noted in the illustrations in **FI-1** regarding the future limited and occasional usage of Jaffe Road only by vehicles to 3 heavy goods vehicles (HGV) bays in the Site;
- (d) it is noted that the construction of a 4-level basement, if feasible, would open up potential opportunities for provision of additional parking spaces. Whilst it is outside the expertise of TD on determining the reasonableness of the arguments illustrated by the applicant on the feasibility of a 4 level basement, we, however, note the following comments from the relevant departments on this issue:
 - (i) Head of Geotechnical Engineering Office, Civil Engineering and Development Department (H(GEO), CEDD):

“it is considered that construction of 4-level basement may be feasible ... the construction of a 4-level basement is not feasible should be further justified with support of technical details and options considered.”; and
 - (ii) CBS/HKE&H, BD:

“... with regard to the technical issues of provision of basement, in general, the ... RSE/RGE should demonstrate the viability of the proposed ELS system in the contexts of the margins of safety against ... There is no particular requirement on the limitation of excavation depth, but the main concern to the retaining height of the

proposed ELS system is the adequacy of margin of safety.”

Whilst the applicant opines that the risk to the neighbouring buildings of deeper excavation as being too great, we note relevant departments with necessary expertise has yet to align with the applicant’s view on the same;

- (e) regarding FI-4, the applicant’s current parking provision is derived by assuming parking provision for retail portion of the development meeting the lower end of the HKPSG requirements whereas the parking provision for the office portion deducing from parking demand observed from similar office buildings in Central in around 2014. However, as mentioned before, future commercial developments should have their sufficient on-site parking and L/UL facilities to match the manifest operational requirements. The applicant should demonstrate how the lower end provision of car parking could meet the operation requirement for the proposed future retail provision at the Site, and the characteristics of office buildings in Central may not be likewise applicable to the subject case in Causeway Bay; and
- (f) taking the example of Lee Garden Two (LG2) with a very similar nature of the subject case, it locates in the same region as the Site and possesses similar close proximity to high capacity public transport system such as MTR, bus stop nodes, GMB and taxi stands, etc. It also consists of similar GFA provision (total GFA of 58,200m² consisting of 45,600m² office GFA and 12,600m² retail GFA). However, LG2 has provided 162 nos. parking spaces (nearly 40% more than the parking provision as proposed in the Site), despite its elongated site configuration. Nevertheless, over-capacity of the usage of car parking and traffic queue during the peak hours such as lunch/dinner times are still observed at LG2 which has induced occasional traffic impact in the adjacent road section (i.e. Pennington Street). The applicant shall holistically revisit the provision of internal traffic facilities to be provided in the proposed development taking into consideration the high-end HKPSG requirements.

2. Chief Building Surveyor/Hong Kong East and Heritage, Buildings Department (CBS/HKE&H, BD):

- (a) as gross floor area (GFA) concession will be applied for green/amenity features and non-mandatory/non-essential plant rooms and services, compliance with the pre-requisites as stipulated in Practice Note for Authorized Persons, Registered Structural Engineers (RSE) and Registered Geotechnical Engineers (RGE), PNAP APP151 Building Design to Foster a Quality and Sustainable Built Environment and PNAP APP-152 Sustainable Building Design Guidelines in are required, in particular that:
 - (i) compliance with the building separation requirements for building;
 - (ii) compliance with the building setback requirements if the width of Gloucester Road that the site abuts is less than 15m; and
 - (iii) compliance with the site coverage for greenery requirements;

- (b) 100% GFA concession may be granted for the proposed underground carpark if the relevant criteria under PNAP APP-2 Calculation of Gross Floor Area and Non-accountable Gross Floor Area - Building (Planning) Regulation 23(3)(a) and (b) are complied with;
- (c) covered area under projecting/overhanging structures/features may be accountable for GFA calculation, unless the criteria for disregarding them from GFA calculation as stipulated in paragraphs 6 and 7 of PNAP APP-19 Projections in relation to Site Coverage and Plot Ratio Building (Planning) Regulations 20 & 21 have been fulfilled;
- (d) if the open area outside the restaurant premises at 3/F is for alfresco dining, requirements under the Buildings Ordinance (BO) and the licensing authority should be complied with;
- (e) detailed checking for compliance with BO will be made at building plan submission stage; and
- (f) comments on **FI-1** are as follows:
 - (i) according to the previous approved general building plan dated 24.4.2018 involving 4-level basement, basement 1 was proposed to be used as shops while basements 2 to 4 were proposed to be used as loading/unloading (L/UL) bays and car parking spaces. The number of car parking spaces under the said scheme were 101 nos. for motor vehicles (including 2 nos. for disabled motor vehicles), 10 nos. for motorcycles and 14 nos. for goods vehicles (L/UL); and
 - (ii) a statutory plan submission prepared by RSE/RGE for Excavation and Lateral Support (ELS) works for the construction of the 3-level of basement (with proposed excavation depth of approximately 17.23m at maximum below the existing ground level) at the subject Site was received by BD on 17.12.2019. The plan was also referred to the Geotechnical Engineering Office, Highways Department, Drainage Services Department and Railway Development Office for comments. For the acceptance of this ELS plan submission, the project RSE/RGE shall be notified within the statutory period (i.e. 60 days) for processing of plan.

3. Chief Engineer/Construction, Water Supplies Department (CE/C, WSD):

- (a) the applicant should make reference to the mains record plans showing the existing water mains in the vicinity of the Site, in which the alignments of the water mains are indicative only. The exact lines and levels of the water mains should be established by hand dug trial pits on-site if they are of significance to the proposed works by the applicant. The applicant should take note of the fact that some changes might have been made to the information shown on the drawings of the record plans in the course of time and that digging of trial holes to ascertain the exact alignment and depth of

water mains will still be necessary before any road excavation; and

- (b) there are some existing fresh water mains within the Site and are affected by the proposed development. Free access should be allowed for WSD at any time to carry out operation and maintenance of these water mains. In case the project proponent considers that diversion of these water mains is required, they should study the feasibility of diverting these water mains. If diversion is considered feasible, the project proponent should submit their proposal for WSD's consideration and approval. The water mains diversion work shall be carried out by the project proponent at their own cost to the satisfaction of WSD. WSD will only carry out the connection works to the existing network and the associated connection cost should be borne by the project proponent. Moreover, a 3m-wide Water Reserve is proposed for the water mains within the Site.

Advisory Clauses

- (a) to note the comments of the District Lands Officer/Hong Kong East to liaise with the concerned private lot owners to sort out issues relating to the private easements and rights of way to facilitate the proposed commercial development; and on the need for lease modification for the proposed dedicated passage on ground level of the proposed development upon Buildings Department (BD) enters into the Deed of Dedication with the owner of the application site;
- (b) to note the comments of the Chief Building Surveyor/Hong Kong East and Heritage, BD regarding the compliance of the proposed commercial development with the sustainable building design requirements as per the Practice Note for Authorized Persons, Registered Structural Engineers and Registered Geotechnical Engineers (PNAP) regarding Building Design to Foster a Quality and Sustainable Built Environment (PNAP APP-151), Sustainable Building Design Guidelines (PNAP APP-152) and Projections in relation to Site Coverage and Plot Ratio Building (Planning) Regulations 20 & 21(PNAP APP-19);
- (c) to note the comments of the Director of Environmental Protection to prepare and submit the sewerage impact assessment as early as possible for implementation of any required sewerage works; and to comply with the relevant noise requirements in Chapter 9 of the Hong Kong Planning Standards and Guidelines;
- (d) to note the comments of the Director of Fire Services to observe the requirements of emergency vehicular access as stipulated in Section 6, Part D of the Code of Practice for Fire Safety in Buildings 2011 which is administered by BD; and
- (e) to note the comments of the Director of Water Supplies on the 3-m wide water reserve and the diversion requirements of existing water mains within the application site and the maintenance requirements of existing water mains in the vicinity of the application site.