

**Response to Comments (2)**  
**S.16 Planning Application No. A/H10/97**

Submission of Layout Plan and Proposed Minor Relaxation of  
Building Height Restriction for Permitted Flat Use at  
The Ebenezer School and Home for the Visually Impaired, 131  
Pok Fu Lam Road, Pok Fu Lam, Hong Kong (RBL 136RP)

**Further Information (2)**

June 2024

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## **Attachments**

**Attachment 1: Replacement Pages of Traffic Impact Assessment Study**

**Attachment 2: Revised Architectural Drawings**

**Attachment 3: Replacement pages of Environmental Assessment**

**Attachment 4: Replacement Pages of Sewerage Impact Assessment**

**Attachment 5: Replacement Pages of Landscape Master Plan**

**Response to Departmental Comments of TD**

<p><b>Commissioner for Transport via memo dated 2.4.2024 (ref.: (HQ9CY) in TD HR 146/192/POK-3(S)) (Contact Officer: Mr. Vincent Tam, tel: 2829 5427)</b></p>	<p><b>Response(s):</b></p>
<p>2. Please find our following comments on the subject further information from traffic engineering viewpoint:</p> <p>(a) The length and width of the proposed bus layby are 13m and 1.5m respectively. Please review if a standard bus layby with the size of 14m x 3.5m could be provided.</p>	<p>Upon our further review, a 14m L x 2.0m W bus layby could be provided as indicated in <b>Figure 2-2</b> in the updated TIA Report_R2 (<b>Attachment 1</b>) if deemed necessary. Based on HyD’s comments dated 20 Dec 2023 and 21 Dec 2023, the space at the concerned maintenance walkway along Pok Fu Lam Road could not be utilized due to the followings:</p> <ul style="list-style-type: none"> <li>(i) The concerned maintenance walkway is to facilitate HyD’s routine monitoring and maintenance works for the existing highway structure H123 (i.e. Pok Fu Lam Road);</li> <li>(ii) No additional loading could be imposed on the existing highway structure H123;</li> <li>(iii) Proper access should be reserved along the walkway to allow HyD’s staff and contractor to carry out inspection and routine maintenance works for slope feature no. 11SW-C/C87 (sub-division 2); on that basis, additional column to support any footpath widening is not feasible;</li> <li>(iv) HyD would not be responsible to maintain any portion of any footpath widening within the private lot boundary; and the concerned walkway is within the private lot boundary.</li> </ul> <p>For consistency, the architectural drawings have been updated to incorporate the proposed 14m L x 2.0m W bus layby and the changes to the proposals for the public footpath (<b>Attachment 2</b>). Under this scheme, bonus GFA will not apply.</p>
<p>(b) According to the Figure A enclosed in Attachment 2, the proposed width of footpath adjacent to the proposed bus layby is 1.3m. Please demonstrate that sufficient width would be provided for boarding/alighting of bus passengers and</p>	<p>Noted. <b>Section 5.3.5</b> and <b>Table 5-5</b> are added in the updated TIA Report_R2 and which show the level of service of the 1.3m footpath adjacent to the bus layby. (<b>Attachment 1</b>) As only 4 boarding/alighting bus passengers are anticipated during the peak 5-min, the 1.3m</p>

<p>the passage of pedestrians. Please review the design and provide the assessment on the level of service of the 1.3m footpath for further review.</p>	<p>footpath would be sufficient to cope with the demand with a LOS of A.</p>
<p>(c) Referring to RtoC item (iv)(f), please review if the space at the maintenance walkway can be utilized for footpath widening along Pok Fu Lam Road.</p>	<p>Please refer to Item (a) above.</p>
<p>(d) The applicant should incorporate the proposed layout of the bus layby and the proposed traffic cylinders for restricting right turn movements to/from the vehicular access of the subject development in their Architectural drawings and TIA for record and reference for implementation.</p>	<p>Noted.</p>
<p>(e) The applicant should confirm the design and construction of the proposed traffic improvement works, including the bus layby and the proposed footpath widening works at Pok Fu Lam Road at their own cost and to the satisfaction of Transport Department and Highways Department.</p>	<p>Noted.</p>
<p>(f) Referring to RtoC item (iii), the applicant should clarify if they would surrender the portion of area within the lot boundary for the proposed bus layby and the footpath widening works at Pok Fu Lam Road to the Government at no cost of the Government or they will propose to open the portion of area within the lot boundary for public use 24 hours a day with no interruption.</p>	<p>Please refer to (a) above.</p>
<p>(g) Referring to RtoC item (iv)(a), please advise the proposed no. of units per block and demonstrate that the proposed provision of 4 nos. of visitor parking spaces would comply with the requirements of Hong Kong Planning Standards and Guidelines (HKPSG).</p>	<p>The nos. of units per block are indicated below:  T1: 30 / T2: 30 / T3: 39 / T4: 36</p> <p>For T1 and T2 with 30 units only, 1 no. of visitor parking per block to be provided. For T3 and T4 with nos. of units between 30-40, 2 nos. of visitor parking will be provided. Hence, a total of 6 visitor car parking spaces will be provided. According to HKPSG, there is no specific requirement on visitor car parking provision for private residential developments with 75 units or less per block. The proposed provisions are considered sufficient taking into account the nos. of units per block.</p>

	For consistency, the architectural drawings have been updated to incorporate the visitor car parking spaces ( <b>Attachment 2</b> ).
(h) Referring to RtoC item (iv)(e), please provide the assessment on the level of service of footpath based on the forecast pedestrian flow scenario.	Noted. <b>Table 5-6</b> is added in the updated TIA Report_R2 to provide the LOS assessment for the section of footpath based on the forecast pedestrian flow scenario. ( <b>Attachment 1</b> )

### **Response to Departmental Comments of EPD**

<b>Comments from Director of Environmental Protection via email dated 26.03.2024 (Contact Officer: Mr. Kelvin Choi, tel: 2835 1594)</b>	<b>Response(s):</b>
<p><b><u>Technical Observations on EA</u></b></p> <p><b>Air Quality</b></p> <p>1. The EA stated that all fresh air intakes are located outside the buffer zone, and there is no opening for ventilation to be within the zone. For clarity, please illustrate the same in the corresponding figures in the EA.</p>	Please see revised Figure 3a, 3b in the EA report (V2.2) ( <b>Attachment 3</b> ).
<p><b>Noise</b></p> <p>1. 3.8.1 claims there is no noticeable noise from fixed noise source or industrial activities. However, some fixed noise sources were found on the roof of some buildings within 300m of the proposed development (See attached figure). Please check and clarify.</p>	Please refer to EA report (V2.2) section 3.3 on the fixed noise assessment. ( <b>Attachment 3</b> ) The Proposed Development would not be subject to adverse fixed noise impact.
<p>2. Please clarify whether the proposed car park contains any fixed noise source which may have noise impact on the proposed development.</p>	Car park will be provided with mechanical ventilation system. However, the proposed residential tower is designed in a single-aspect configuration, where none of the openable windows in habitable rooms will face the proposed carpark. It is less likely that the mechanical ventilation system (fan system) of the car park will impose significant noise impact on the proposed residential development. In all circumstances, potential noisy facilities in the carpark will be designed to meet the relevant standard stipulated in the HKPSG, by various means such as selection of quiet equipment, use of shielding device, acoustic louvers, silencers, semi/full-enclosure.
<p>3. For completeness, please also address the Predicted Road Traffic Noise at selected Selective Receivers (PM) for the</p>	Please refer to revised Appendix 3 in the EA report (V2.2). ( <b>Attachment 3</b> )

mitigated scenario (Vertical Fin, and Fixed Glazing with Maintenance Window).	
Noted from the submission that demolition of the existing buildings will be involved for the proposed development, please advise the applicant to minimise the generation of C&D materials, and reuse and recycle the C&D materials on site as far as possible.	Noted. Please refer to EA report (V2.2) section 4 on the construction waste disposal management. <b>(Attachment 3)</b> Best management practice will be adopted for the construction of the Proposed Development so that no significant waste management implications is anticipated during the construction phase.
<b>Technical Observations on SIA</b>	
4. For Appendix A and Appendix B, Catchment T is duplicated. Please revise the catchment numbers.	No. 3 Sassoon Road Academic Building has been renamed to Catchment AH. The replacement pages of the SIA are attached at <b>Attachment 4</b> .
5. For the words ""Sewerage Catchment (From FMH7022574 to FMH7038862)"" above the first table, manhole number FMH7038862 should be read as FMH7022415.	The title has been revised accordingly. <b>(Attachment 4)</b>
6. For the hydraulic checking table, please add the connection point from catchments W to AF in the remark.	The remark at FMH7022432 has been revised to "connection point from catchments W to AG". <b>(Attachment 4)</b>
7. Surcharge arising from the proposed development is anticipated. For those sewers with flow capacity >90% and those with surcharge condition, please propose mitigation measure(s).	Mitigation measure has been supplemented in Section 4.7.

### Response to Departmental Comments of UD&L, PlanD

<b>Comments from CTP/UD&amp;L, PlanD via email dated 18.3.2024 (Contact Officer: Mr. Ngai Chakman, tel: 3565 3955)</b>	<b>Response(s):</b>
<p><u>Detailed Comments on the FI</u></p> <p><i>Attachment 10 – Replacement Pages of Tree preservation Proposal</i></p> <p>3. Para. 6.4 and Table 6.1 - It is still noted that 27 new trees are proposed to achieve a new tree planting ratio of not less than 1:1 in terms of the numbers of trees felled. The applicant is advised to explore opportunity of replacing the grasscrete area by lawn/groundcover/shrub plantings for planting more new trees as far as practicable. Our previous comment item no. 8 dated 28.12.2023 is still valid.</p>	<p>Noted, the compensatory planting has sought at achieving a 1:1 ratio in terms of the number of trees.</p> <p>The area of grasscrete has been replaced by paving. <b>(Attachment 5)</b></p>

<p><i>Attachment 11 – Replacement Pages of Landscape Master Plan</i></p> <p>4. Para. 8.8 – The “<u>tree and ornamental shrub planting...</u> at the <u>north eastern</u> and <u>south western</u> ends of the street” could not be observed from the LMP. Please review and suitably revise this paragraph of the LMP.</p>	<p>Please note the paragraph has been revised. (<b>Attachment 5</b>)</p>
<p>5. Para. 9.4 and Table 9.1 – It is still noted that the applicant has not maximised the greening areas as far as practicable and plant more native species to enhance the biodiversity of the Site and its surrounding. Our previous comment item no. 11 is <u>still valid</u>.</p>	<p>Noted the green coverage is provided in accordance with Buildings Department Practice Notes PNAP APP-152 Sustainable Building Design Guidelines. This commitment has been made in the LMP report.</p> <p>The proportion of native species has been increased.</p>
<p>6. Figure 5.1 – According to the section, the maintenance walkway is <u>less than 2.5m wide</u> and down to the bottom level 128.70mPD, which does not tally with the annotation “2.5mW. Maintenance Walkway at +132.2”. The annotation “1.5mW. Retaining structure for Existing Slope under Pokfulam Road” is pointed to the 1.5m wide gap and not the retaining structure. Please review the section and annotation accordingly.</p>	<p>Noted. A revised Figure 5.1 is at <b>Attachment 5</b>. The detailed dimensions and levels of some sections of the maintenance access would be subject to the retaining structure. The maintenance access shown in Figure 5.1 and 5.2 are indicative only. The detail design and layout of the maintenance access would vary and would be subject to detailed design stage and agreement from Highways Department.</p>
<p>7. Figures 5.1 &amp; 5.2 – The applicant should clarify the height and material (e.g. solid?) of the wall along the Pok Fu Lam Road pedestrian walkway.</p>	<p>Noted, the fence wall will be constructed of reinforced concrete with a decorative finish which will be determined during the detailed design stage of the project. However, it should be noted that the entire length of the fence wall facing (Pokfulam Road to the north) will include a proprietary vertical greening system and so will appear green to pedestrians and vehicle travelers.</p>
<p>8. Figures 5.1 &amp; 5.2 - <u>No proper maintenance access</u> is indicated for the vertical green wall facing Pok Fu Lam Road. The applicant is reminded to review and ensure the width of the maintenance access is sufficient for carrying out routine vegetation maintenance in front of the proprietary green wall system. Our previous comment item no. 13 dated 28.12.2023 is <u>still valid</u>.</p>	<p>Noted. The provision of a proper maintenance access would be reviewed at the detailed design stage.</p>
<p>9. Figure 5.2 – According to the section, the slope maintenance access is <u>less than 2.5m wide</u>, which does not tally with the annotation “2.5mW. Maintenance Walkway at +132.2”. Please review the section and annotation accordingly.</p>	<p>Noted. A revised Figure 5.2 is at <b>Attachment 5</b>. The detailed dimensions and levels of some sections of the maintenance access would be subject to the retaining structure. The maintenance access shown in Figure 5.1 and 5.2 are indicative only. The detail design and layout of the maintenance access would vary</p>

	and would be subject to detailed design stage and agreement from Highways Department.
10. Figure 5.4 – The section is still not tallied with the section cut line. Please review. Our previous comment item no. 14 dated 28.12.2023 is <u>still valid</u> .	Noted, the section line has been relocated. <b>(Attachment 5)</b>
11. Para. 8.12, Figures 4.1, 5.2, 5.6 and 9.1– It is observed that a large area of lawn at the Terrace Garden has been replaced by grasscrete in this submission. without adequate justifications. As mentioned in item no. 3 above, the applicant is advised to review the design to replace the grasscrete by lawn/groundcover/shrub planting areas for more tree planting as far as practicable.	The area of grasscrete has been replaced by paving. <b>(Attachment 5)</b>
<u>Advisory Comments to the Applicant</u> 12. Our previous advisory comment item no. 16 dated 28.12.2023 is <u>still applicable</u> .	Noted, a formal Tree Preservation and Removal Proposal will be issued to relevant government departments in accordance with Lands Department Practice Note 6/2023 Processing of Tree Preservation and Removal Proposals for Building Development in Private Projects - Compliance with Tree Preservation Clause under Lease.



<b>Comments from Chief Town Planner/Urban Design and Landscape, Planning Department via email dated 14.3.2024 (Contact Officer: Mr. Daniel TANG, tel: 3565 3942)</b>	<b>Response(s):</b>
(b) The Site is elongated in configuration adjacent to Pok Fu Lam Road. The linear disposition of building blocks exhibits a continuous frontage along the road. It is noted that the applicant has proposed various design features including setback from Pok Fu Lam Road, extensive vertical greening facing Pok Fu Lam Road, articulation of building façade and landscape treatment, etc. to reduce the perceivable building mass. As shown in the VIA, to demonstrate the visual impact of the proposed increase in BH of 13m, the Proposed Scheme with the BH of 164mPD is compared against the Baseline Scheme with the BH of 151mPD. With the implementation of the mitigation and design measures, the overall visual impact is considered to be slightly adverse as viewed from VP2, 4, 5 and 6.	Noted.
(c) Taking into account the proposed amendments to the OZP for the proposed Global Innovation Centre agreed by the MPC of TPB on 1.3.2024, the applicant is suggested to include the Global Innovation Centre in the Baseline Scheme and Proposed Scheme of the VIA.	<p>This s.16 application was submitted before the proposed amendments to the OZP were agreed by the TPB for public exhibition and inspection. The proposed amendment is still subject to the statutory rezoning process including the hearing of representations. The proposed development of Global Innovation Centre has not yet been confirmed and approved.</p> <p>Hence, current development scenario demonstrated in the photomontages should be maintained.</p>

**Response to Departmental Comments of HyD**

<b>Comments from Chief Highways Engineer/Hong Kong, Highways Department via email dated 26.3.2024 (Contact Officer: William CHAN, tel: 2231 5625)</b>	<b>Response(s):</b>
Please be advised that we have no adverse comment from highways maintenance viewpoint to the further information submitted by the applicant.	Noted.
Regarding the proposed widened footpath, we reserve our comment on the maintenance	Noted.

responsibility of this widened footpath upon receiving the detailed design in later stage.	
We also confirm that maintenance access to slope feature no. 11SW-C/C87 abutting Pok Fu Lam Road is required.	Noted.

<b>Comments from Chief Highways Engineer/Bridge and Structure, Highways Department via email dated 15.3.2024 (Contact Officer: Wilfred H.K. NGAI, tel: 3903 6521)</b>	<b>Response(s):</b>
I have no further comments on the responses to comments from highway structure design point of view at this juncture noting that the impact assessment on existing highway structure no. H123 (bridge) would be submitted at a later stage.	Noted.

<b>Comments from Chief Engineer/Railway Development Division 1-1, Highways Department via email dated 3.4.2024 (Contact Officer: Mr. TAM Yiu Fai, Ray, tel: 3525 1827)</b>	<b>Response(s):</b>
The subject site falls within the administrative route protection boundary of the proposed South Island Line (West). Please note that there may be potential interface between proposed works under South Island Line (West) project and the subject development. This Office shall be consulted on any update of this submission in due course.	Noted, Railway Development Division 1-1, Highways Department will be consulted in due course.

#### **Response to Departmental Comments of DSD**

<b>Chief Engineer/Hong Kong and Island, Drainage Services Department via email dated 28.3.2024 (Contact Officer: Derrick KWOK, tel: 3101 2361)</b>	<b>Response(s):</b>
1. In estimating the sewage flows in accordance with the Guidelines for Estimating Sewage Flows for Sewage Infrastructure Planning published by the EPD, all proposed parameters and assumptions should be subject to the agreement of the EPD. However, the following is observed –	Noted.
a. Appendix B - The calculation of total peak flow at the manhole/sewer concerned by summation of the individual peak flows of the respective catchments may be over-estimated, since it should be based on the cumulative average flows and the peaking factor selected with regard to the	Appendix B is revised accordingly ( <b>Attachment 4</b> ). Cumulative daily flow (excluding pools) and cumulative population are supplemented.

contributing population of all catchment areas of the manhole/sewer concerned.	
b. Appendix B - In the estimation of sewage flows from pools, the unit flow and peaking factor approach introduced in the EPD's Guidelines should not be applicable. Therefore, relevant flow components should be excluded in the calculation of contributing population and the application of peaking factor. Please add a separate column for the sewage flow from swimming pools to avoid counting such flow in the calculation of contributing population.	Sewage flow from swimming pools is excluded counting such flow in the calculation of contributing population and the application of peaking factor.
2. FMH7038820 receives sewage from Catchments A to O and the proposed development. Please review and revise the remark for the sewer section from manhole no. FMH7038820 to FMH7022533.	The remark at FMH7038820 has been revised to "Existing Flow from Source A to O, Q and T" in Appendix B. ( <b>Attachment 4</b> )
3. For the freeboard checking, the comments are as follows:- a. Please review and explain if it is valid to assume that the water level at the exit is equal to the critical depth from the invert level when the pipe is under-capacity.	The utilization of sewers from FMH7022432 to FMH7022445 and from FMH7022445 to FMH7023281 are 172.43% and 71.16% respectively after the development. As the capacity of the sewer between FMH7022445 and FMH7023281 is not fully utilized, the water level at the exit of FMH7022445 is assumed as the diameter of the sewer which is 225mm.
b. For the calculation of head losses, the calculation of friction loss along the sewer section is missing. Besides, please state the assumption of head loss coefficient.	Calculation of friction loss along the sewer has been included in Appendix C. Sharp-edged entrance is assumed for entry losses. ( <b>Attachment 4</b> )
c. Please be reminded that the water level should be the hydraulic grade. Whilst, the total head is the sum of the hydraulic grade and the velocity head. After calculating the total head at the upstream of the surcharged sewer section, the velocity head should be subtracted to obtain the hydraulic head.	Noted and it has been addressed in Appendix C. ( <b>Attachment 4</b> )
d. In accordance with section 5.1.1 of our Sewerage Manual (Part 1), not only the minimum freeboard but also the minimum factor of safety against overflowing of 1.15 should be checked against. Please supplement.	Factor of safety against overflowing of 1.15 has been applied to peak flow at FMH7022432 for freeboard checking in Appendix C. ( <b>Attachment 4</b> )
This is a coordinated reply of DSD's Hong Kong & Islands Division and Land Drainage Division.	Noted with thanks.

## Response to Departmental Comments of AMO

<b>Comments from Antiquities and Monuments Office via email dated 9.4.2024 (Contact Officer: Ms. Alice YU, tel: 2655 0749)</b>	<b>Response(s):</b>
<p>We note that the Applicant will document both interior and exterior of the existing buildings in the application site and their setting through photographic and video recordings, and intends to feature the history of the Ebenezer School &amp; Home for the Visually Impaired at the new campus in Tung Chung. Nevertheless, referring to Applicant's response in Further Information 3 of rezoning application no. Y/H10/14 dated 22 April 2022, the Applicant would provide reasons if preservation of parts or fabrics of Ebenezer Old Age Home, Old Wing of Ebenezer School &amp; Home for the Visually Impaired and the Carport (the "Buildings") is found infeasible. We would also appreciate it if 3D scanning records of the Buildings, as mentioned in the Further Information 3 of rezoning application no. Y/H10/14, could be shared with AMO, if feasible. The Applicant is welcome to contact Alice YU (tel: 2655 0749 and email: alicemwyu@amo.gov.hk) of AMO for discussion on the scope of recordings, if needed.</p>	<p>Preservation of the building is technically infeasible as a building setback from Pok Fu Lam Road is required for the future residential development to comply with HKPSG air quality and noise standards. Preservation of parts of the buildings is also financially infeasible for the Applicant. Should 3D scanning of the Buildings be feasible, the Applicant will share the records with AMO.</p>