

Section 16 Planning Application

**LAYOUT PLAN SUBMISSION AND PROPOSED
MINOR RELAXATION OF BUILDING HEIGHT
RESTRICTION FOR PERMITTED FLAT USE AT 131
POK FU LAM ROAD, HONG KONG, RBL 136RP**

Applicant:

**The Ebenezer School and Home for the Visually Impaired
Limited**

November 2023

EXECUTIVE SUMMARY

- S1. This application is made by the Ebenezer School and Home for the Visually Impaired Limited (“Ebenezer”), for approval of a layout plan relating to a residential development at 131 Pok Fu Lam Road. The application also proposes a minor relaxation of the building height restriction (“BHR”) which is 151mPD.
- S2. The site has been occupied by Ebenezer since 1913. The redevelopment of the site for residential purposes will support the relocation of Ebenezer to a new school and home, with state-of-the-art facilities for the visually impaired. The rezoning of the site to “Residential (Group C) 7” [“R(C)7”] has been completed and is now included on the Approved Pok Fu Lam Outline Zoning Plan No. S/H10/21.
- S3. The Notes of the “R(C)7” zone require submission of a layout plan and associated information for the residential development at the site. The proposed “Flat” use is always permitted. The proposed scheme is a low - to medium-rise development that will be compatible with the surrounding developments in terms of land use, scale, building height and form.
- S4. In accordance with the requirements under “R(C)7” zone, an environmental assessment, sewerage impact assessment and other technical assessments have been conducted. These have placed constraints on the form and location of the building, particularly the traffic noise impact, air quality impact, traffic impact, geotechnical feasibility, air ventilation, tree preservation, visual and landscape impact. Mitigation for these issues is explained in the assessments, but the main impacts are the use of part of the site for a widened public footpath, the provision of a maintenance path for access to the engineering structures supporting Pok Fu Lam Road, and the movement of the residential building away from the road frontage for traffic noise and air quality reasons.
- S5. During the rezoning stage the Transport Department requested the widening of the public footpath on the western side of Pok Fu Lam Road abutting the application site boundary. In this application the footpath is widened for the benefit of the general public to a consistent width of 2.5m. As a result, 40sqm of the private land lot is proposed to be dedicated for public passage. The Applicant would subsequently apply for 200 sqm of bonus GFA which will be subject to approval from the Buildings Department. With the proposed minor relaxation of BHR, the proposed scheme will be able to accommodate the 200sqm of bonus GFA, if granted.
- S6. With the need to set back the development from the Pok Fu Lam Road frontage, the actual area of the site that can be built on is significantly restrained. Under the zoning the permitted development potential is a plot ratio of 1.9, which is 12,274 m² Gross Floor Area (GFA). With the constraints placed on the location within the layout;

together with the proposed road widening works and the minimisation of the excavation volume, the permitted development could not be achieved within the 151mPD BHR. Hence, the minor relaxation is requested.

- S7. The minor relaxation is 13m greater than the BHR, representing only an 8.6% increase. The main portion of the development will still be below Pok Fu Lam Road level. The applicant is not requesting an excessive increase in building height. The proposed buildings of up to 11 storeys will still be lower than the surrounding residential buildings and at 164mPD, it will be consistent with the BHR at the adjacent University of Hong Kong “Government, Institution or Community” site to the west of the application site. In this context, the proposed development is consistent with the general form of development in the locality, and is not expected to bring any significant negative visual impact to the surrounding environment and buildings.
- S8. The proposed scheme will provide high-quality residential flats consistent with the character of the area and will bring urban design and public realm improvements, benefiting the existing and future residents as well as the general public.

Table S1: Indicative Development Parameters

| Development Parameters | Proposed Scheme |
|--|--|
| Site Area | 6,460 m ² (about) |
| Domestic GFA | Not more than 12,274 m ² |
| Non-accountable Bonus GFA ¹ | 200 m ² |
| Domestic Plot Ratio | Not more than 1.9 |
| Domestic Site Coverage | Not more than 33.33 % |
| No. of Blocks | 4 |
| Maximum Building Height (mPD) | Not more than 164 mPD |
| No. of Storeys: Block T1-T3 Block T4 | 11 storeys (incl. lobby level at LG2/F) 10 storeys (incl. lobby level at LG1/F) |
| Private Open Space | No less than 400 m ² |
| Greenery Coverage | No less than 20.1 % |
| Number of Units | 135 |
| Average Unit Size | About 90.9m ² |
| Recreational Facilities (Clubhouse) GFA | About 614 m ² |
| <u>Parking Provisions:</u> Private Car Spaces Motorcycle Spaces L/UL Spaces | 106 (including 5 accessible) 1 4 |
| Design Population (approximate) | 392 |

¹ The non-accountable Bonus GFA is subject to the approval of Buildings Department at the detailed design stage.

行政摘要 (以英文版本為準)

- S1. 申請人心光盲人院暨學校(下稱「心光」)請求核准發展藍圖，以容許位於香港薄扶林道 131 號(下稱「申請地點」)的住宅發展，並略為放寬住宅發展的建築物高度限制，即主水平基準上 151 米。
- S2. 自 1913 年始，心光已於申請地點開展服務。擬議的住宅重建方案有助學校搬遷至全新建設的校舍，並引入先進的設施滿足視障人士的需要。申請地點的土地用途修訂已完成，已於核准的薄扶林分區計劃大綱圖編號 S/H10/21 顯示為「住宅（丙類）7」。
- S3. 「住宅（丙類）7」的《註釋》要求申請人就申請地點的住宅發展提交發展藍圖及相關資料。擬議的「分層住宅」屬經常准許的用途，擬議方案涉及低至中層建築物發展，與毗鄰發展在土地用途、規模以至建築物高度及外型皆相融。
- S4. 申請人已就項目「住宅（丙類）7」地帶要求，提交了詳盡的評估報告，包括環境評估、污水影響評估等。為符合擬議住宅發展的要求，申請人就交通噪音、交通影響評估、土力影響評估、空氣質素影響評估、樹木保護及視覺及景觀影響評估等要求設計發展方案，這些技術要求均對建築物的外型及位置構成限制。評估報告涵蓋了舒緩措施，其中對擬項目構成主要影響包括使用了部分申請地點擴闊公共行人通道、為支撐薄扶林道的土木工程構築物提供維修通道及因應交通噪音及空氣質素的技術要求將住宅大樓遠離道路正面。
- S5. 於土地用途修訂階段，運輸署要求擴闊毗連申請地點，位於薄扶林道西面的行人通道。本申請將對此段行人通道加寬至 2.5 米，供公眾使用。因此，申請人撥出申請地點內 40 平方米私人地段的土地作為公眾通道用途。申請人隨後將向屋宇署提供申請，要求批予 200 平方米額外總樓面面積。假若屋宇署核准相關申請，擬議的略為放寬建築物高度限制將能夠容納該 200 平方米的額外總樓面面積。
- S6. 發展項目須從薄扶林道臨街位置向後移，對申請地點的實際建築面積構成極大限制。大綱圖列明可容許的地積比率為 1.9 倍，相等於總樓面面積 12,274 平方米。因各種技術要求、行人通道擴闊以及減少挖掘量，均限制了申請項目的可建位置和佈局，因此在水水平基準上 151 米的高度限制下，項目將未能容納擬議發展。
- S7. 申請人要求放寬 13 米的建築物高度限制，相等於 8.6% 的增加。擬議發展項目的主要部份仍低於薄扶林道的水平。申請人並不是要求大幅度放寬高度限制，擬議的 11 層高度為主水平基準上 164 米，仍低於鄰近的住宅大廈，並與位於申請地點西面的香港大學「政府、機構或社區」發展地點高度限制一致。因此，擬議發展項目與地區的整體構築相融，並不會對毗鄰環境及建築物帶來重大的視覺景觀影響。

- S8. 擬議的發展計劃符合薄扶林的地區特色，為區內提供優質的住宅單位，提升城市設計及改善公共空間，不單裨益現有及將來的住客，亦為社會大眾帶來好處。

表 S1: 擬議發展計劃的概括發展規範

| 發展規範 | 擬議項目 |
|----------------------------------|--|
| 地盤面積 | 6,460 平方米 (約) |
| 住用總樓面面積 | 不多於 12,274 平方米 |
| 無須計算的額外總樓面面積 ² | 200 平方米 |
| 住用地積比率 | 不多於 1.9 倍 |
| 住用上蓋面積 | 不多於 33.33 % |
| 幢數 | 4 |
| 最高建築物高度 (主水平基準上) | 不多於 164 米(主水平基準上) |
| 幢數: T1-T3 T4 | 11 層 (包括位於 LG2/F 大堂) 10 層 (包括位於 LG1/F 大堂) |
| 私人休憩用地 | 不少於 400 平方米 |
| 綠化上蓋面積 | 不少於 20.1 % |
| 單位數目 | 135 |
| 平均單位面積 | 約 90.9 平方米 |
| 康樂設施 (會所) 總樓面面積 | 約 614 平方米 |
| 停車位: 私家車車位 電單車車位 上落客貨車位 | 106 (包括 5 個傷健人士位) 1 4 |
| 住客數目 (約) | 392 |

² 無須計算的額外總樓面面積將於詳細設計階段按屋宇署核准計算

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1. Introduction

- 1.1 This Planning Statement is in support of a Section 16 application under the Town Planning Ordinance for a site located at 131 Pok Fu Lam Road. The application is submitted on behalf of the applicant, Ebenezer School and Home for the Visually Impaired Limited (subsequently referred to as Ebenezer), who currently owns and occupies the site.
- 1.2 The Section 16 application comprises a proposed residential development. The application site is zoned "Residential (Group C)7" ("R(C)7") on the Approved Pok Fu Lam Outline Zoning Plan No. S/H10/21. In accordance with the Notes of the "R(C)7" zone, whilst the proposed residential Flat use is under Column 1 and is always permitted, the submission of a layout plan is required for any new development or redevelopment of the existing building. The "R(C)7" application site is also subject to a maximum plot ratio of 1.9 and a maximum building height of 151mPD. As such, this application is for:
- i. The submission of a layout plan for the proposed residential development; and
 - ii. A minor relaxation of the building height restriction ("BHR") from 151mPD to 164mPD.
- 1.3 The application site has a long history of rezoning proposals to enable the redevelopment of the site for residential purposes. This would subsequently support the relocation of Ebenezer and the provision of new school with state-of-the-art facilities for the visually impaired. On 6 May 2022, the S.12A application (no. Y/H10/14) to rezone the site from "Government, Institution or Community" to "Residential (Group 7)" was accepted by the Town Planning Board. This was then reflected as amendments in the draft Pok Fu Lam OZP No. S/H10/20. On 30 May 2023, the Chief Executive in Council approved the draft OZP incorporating the rezoning of the subject site to "R(C)7". Now that the rezoning of the site has been completed, this S.16 application is submitted to secure an implementable residential scheme, to enable Ebenezer's relocation and the construction of a new school for the visually impaired.
- 1.4 The application includes the widening of the public footpath on the western side of Pok Fu Lam Road abutting the application site. Consequently, a small portion of the application site (private land lot RBL 136RP) is proposed to be dedicated for public passage. A minor relaxation of BHR is therefore proposed to accommodate any bonus GFA which may be granted.
- 1.5 In addition, the inclusion of other features, such as building setback to meet technical requirements have resulted in a very constrained site. If the BHR was not relaxed then the permitted GFA of 12,274 sqm could not be achieved.

- 1.6 Technical assessments have been carried out and the proposed scheme is acceptable in terms of traffic noise impact, air quality impact, sewage impact, drainage impact, traffic impact, geotechnical feasibility, air ventilation, tree preservation, visual and landscape impact.

2. The Applicant

- 2.1 The applicant is the Ebenezer School and Home for the Visually Impaired Limited. Ebenezer had a modest beginning in 1897 when a German Missionary from the Hildesheimer Blindenmission (Hildesheimer Mission) came to Hong Kong and began to care for four blind girls. In 1900 the school was established in To Kwa Wan and in 1913 opened a school on the present site in Pok Fu Lam. In 1930 the whole operation was moved to the Pok Fu Lam Road site. In 1962 the existing building (Old Wing) was opened and the adjacent training centre (now called Ebenezer New Hope School – not part of the application site) was opened in 1978. The applicant therefore has a history of providing education, accommodation, care and Christian ministry to Hong Kong's blind and visually impaired for a very long time.
- 2.2 The Ebenezer School and Home for the Visually Impaired Limited is the registered owner of the application site RBL No. 136 RP (see **Figure 1**) while the Hildesheim Mission to the Blind is the owner of the adjacent lot RBL 1015. Ebenezer is the operator/manager of the School and Home, the Elderly Home and the New Hope School. There is a close and long relationship between the two organisations which in simple terms could be explained as the Ebenezer being the Hong Kong representative of the Hildesheim Mission.
- 2.3 As of 2020/2021, the School and Home together with the New Hope School provides quality education, training and rehabilitation services to almost 600 students. Within the Ebenezer School and Home, the range of services includes the Early Intervention Programme for the visually impaired children aged 0-6, the Ebenezer Child Care Centre with residential services, the Ebenezer School that offers boarding services and mainstream curriculum from Primary 1 to Secondary 6, and the Ebenezer Care and Attention Home that provides residential care for the elderly. The School and Home therefore become a major part of the visually impaired people's lives.
- 2.4 For clarity, RBL No.136 RP is the application site. The adjacent RBL 1015 is occupied by the Ebenezer New Hope School, is not part of the application site, and will continue to be operated by Ebenezer.

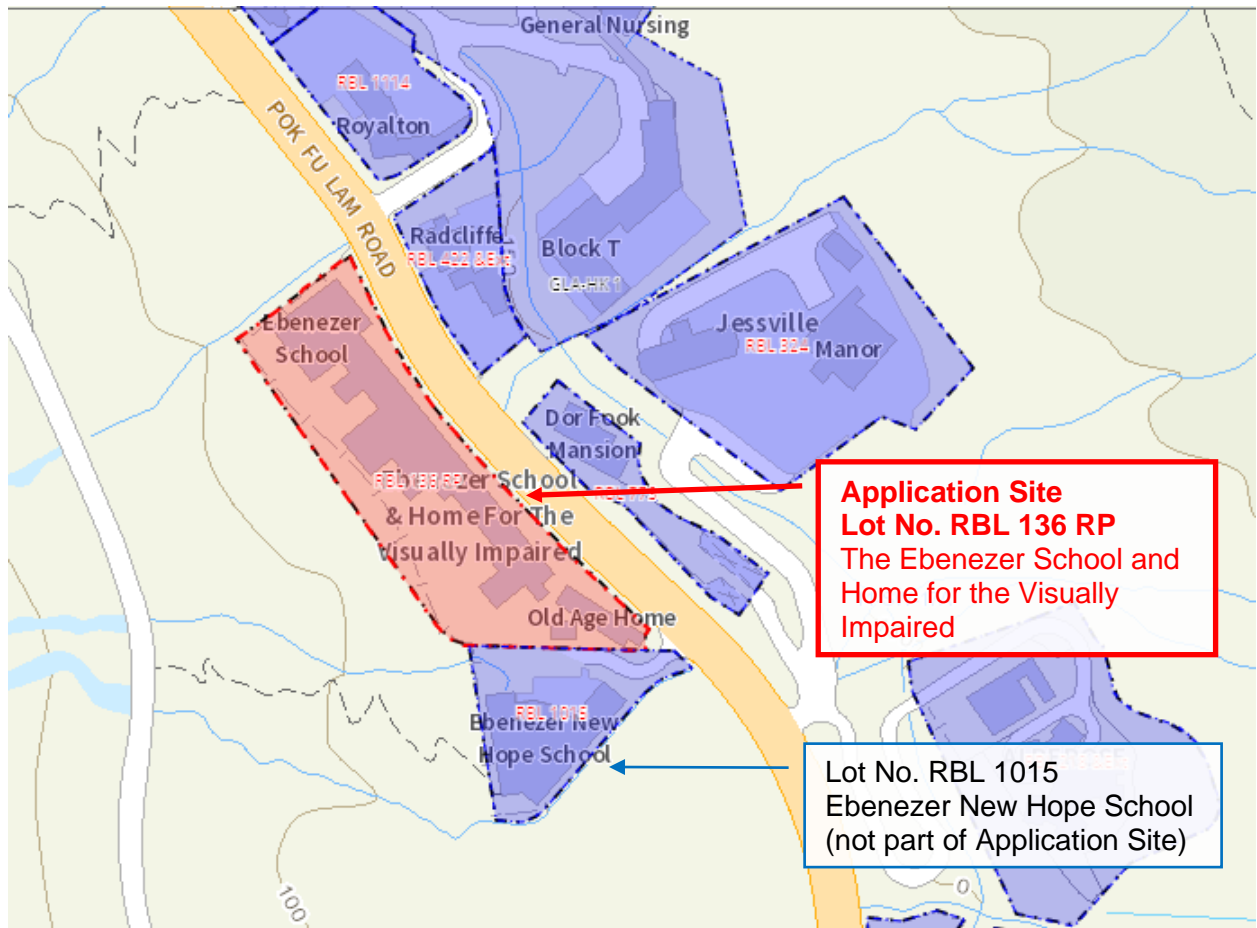


Figure 1: Land Status Plan and Location Plan

3. The Application Site and Its Surroundings

3.1 The Application Site

3.1.1 The application site has an area of approximately 6,460 square metres (sqm) and is located on the western side of Pok Fu Lam Road. The site is located at the top of a slope which falls down towards Victoria Road to the west. The site has a long frontage along Pok Fu Lam Road.

3.2 Existing Development on the Site

3.2.1 The existing buildings on the site are situated parallel to Pok Fu Lam Road and constructed on a platform approximately 10 metres below the general road level. The existing buildings are 6 to 7 storeys high and can be seen in **Figure 2 to 5**. The roof-top of the existing buildings (main roof level excluding any roof top structures) is at a height of about 151mPD.

3.2.2 The total floor space of the existing buildings within the application site is approximately 12,504 square metres GFA, which is equivalent to a plot ratio of approximately 1.9.

3.3 Existing Neighbourhood

3.3.1 The surrounding areas are hilly. The general neighbourhood surrounding the site is predominantly medium- to high-rise, high quality residential (**see Figure 5 and 6**). On the opposite side (east) of Pok Fu Lam Road, there are a variety of residential developments generally more than 20 storeys in height. This includes Jessville Tower (227mPD), Dor Fook Mansion (182mPD), Radcliffe (216mPD) and Royalton (216mPD). To the north along this side of Pok Fu Lam Road is Queen Mary Hospital. The site is therefore a relatively isolated site on the lower side of Pok Fu Lam Road with the only other building on that side of the road being the Ebenezer New Hope School operated by the same organization. The other development on this lower side of Pok Fu Lam Road is the residential development of Woodbury Court, which is further south on Pok Fu Lam Road and is also more than 20 storeys in height.

3.3.2 The other main uses in the area are for education, medical and healthcare purposes and are predominantly medium- to high-rise buildings. This includes the Queen Mary Hospital complex (QMH) to the north and the University of Hong Kong (HKU) buildings located along Sassoon Road, of which the academic building at 3 Sassoon Road was recently completed in 2022. QMH comprises a series of buildings with building heights ranging from 176mPD to 300mPD, whilst the cluster of HKU facilities along Sassoon Road ranges from 132.7mPD to 187.7mPD.

3.3.3 In addition, University of Hong Kong staff quarters and apartments at New Alberose, Old Alberose and Middleton Towers are located further to the south on Pok Fu Lam Road. These buildings are also predominantly medium- to high-rises.



Figure 2: 1 View of Ebenezer from the east side of Pok Fu Lam Road



Figure 3: Ebenezer New Hope School



Figure 4: Panorama of the application site from the east side of Pok Fu Lam Road



Figure 5: Elderly Home (Old Age Home) building within the application site that is no longer in use



Figure 6: High rise, high-quality residential buildings opposite the application site on Pok Fu Lam Road



Figure 7: View of high-rise residential buildings to the south of the application site, located along the western side of Pok Fu Lam Road

4. Planning Context

4.1 Statutory Planning Context

- 4.1.1 The Application Site falls within the “Residential (Group C)7” (“R(C)7”) zone on the Approved Pok Fu Lam Outline Zoning Plan No. S/H10/21 (the “OZP”) (**Figure 8**). The zone is subject to a Building Height Restriction (BHR) of 151mPD and a restriction on the maximum Plot Ratio of 1.9.

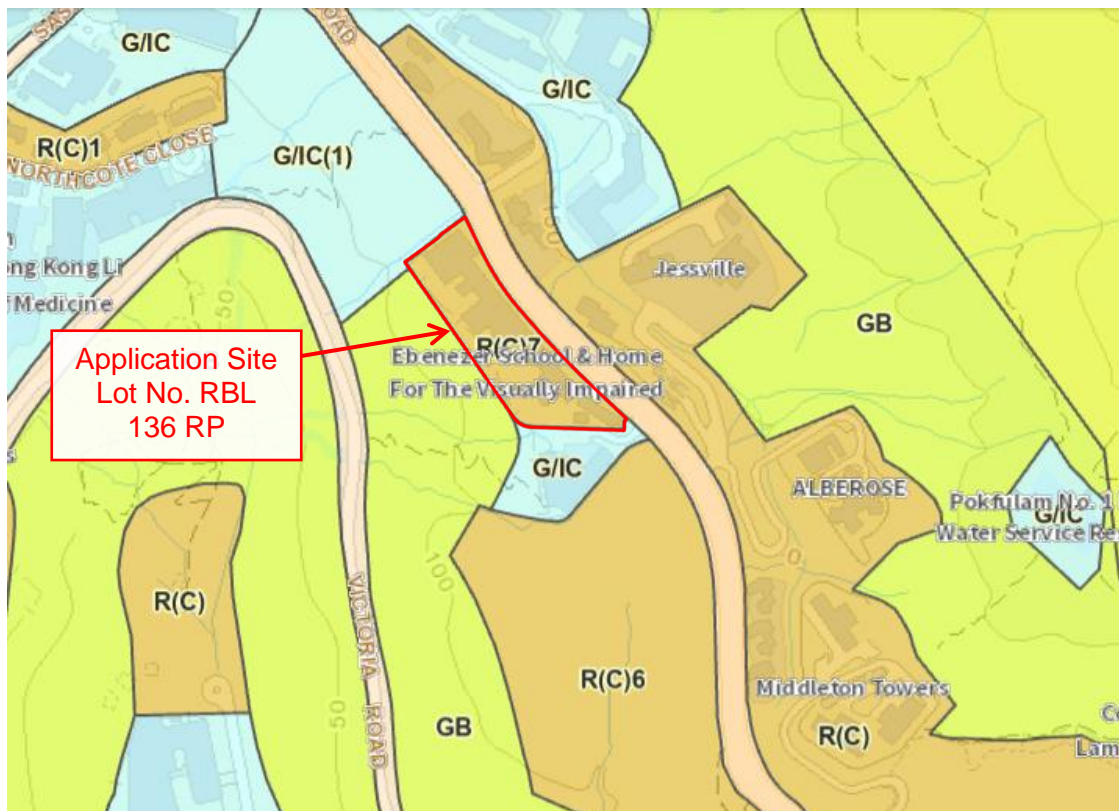


Figure 8: Approximate Location of Application Site on the OZP

- 4.1.2 In the Notes of the OZP, in the “R(C)” zone, the planning intention is stated as:

“This zone is intended primarily for low to medium-rise and low to medium-density residential developments where commercial uses serving the residential neighbourhood may be permitted on application to the Town Planning Board.”

- 4.1.3 Remark (2) and (3) relate to the sub-area of “R(C)7”, it is stated:

“(2) For sub-area “R(C)7”, no new development, or addition, alteration and/or modification to or redevelopment of an existing building shall result in a total development and/or redevelopment in excess of a maximum plot ratio of 1.9 and a

maximum building height of 151 metres above Principal Datum, or the plot ratio and height of existing building, whichever is the greater.

(3) For any new development or redevelopment of an existing building at sub-area “R(C)7”, a layout plan shall be submitted for the approval of the Town Planning Board. The layout plan should include the following information:

- (i) the proposed land use(s), and the form, disposition and heights of all buildings (including structures) to be erected on the site;*
- (ii) the proposed total gross floor area for various uses and facilities;*
- (iii) an environmental assessment report to examine any possible environmental problems in terms of air quality and traffic noise that may be caused to the proposed development and the proposed mitigation measures to tackle them;*
- (iv) a sewerage impact assessment report to examine any sewerage problem that may be caused by the proposed development and the proposed mitigation measures to tackle them; and*
- (v) such other information as may be required by the Town Planning Board.”*

4.1.4 In accordance with the Schedule of Uses of the “R(C)7” zone, the proposed residential development would be a “Flat” development, which falls under Column 1 and is always permitted. The main purpose of this S.16 application is to submit the layout plan and the associated information as required under Remark (3) of the “R(C)7” zone.

4.1.5 Clause (6) of the Remarks includes a provision for the minor relaxation of the plot ratio and BHR:

“(6) Based on the individual merits of a development or redevelopment proposal, minor relaxation of the plot ratio, site coverage and building height restrictions stated in paragraphs (1) and (2) above may be considered by the Town Planning Board on application under section 16 of the Town Planning Ordinance.”

4.1.6 In accordance with Clause (6) of the Remarks, a minor relaxation of BHR from 151mPD to 164mPD is also proposed under this S.16 application.

4.1.7 The proposed scheme includes a widening of public footpath on Pok Fu Lam Road. This has been proposed in response to Transport’s Department request made during the S.12A stage (no. Y/H10/14). As a result, 40 sqm of the application site (private land lot RBL 136RP) is proposed to be used for public passage.

4.2 Neighbouring Zonings

- 4.2.1 The neighbourhood zonings generally reflect the predominantly residential character of the area, as shown in **Figure 8**. The site is bounded by Pok Fu Lam Road to the east and on the opposite side of the road it is zoned “R(C)”. This zone permits developments to a maximum plot ratio of 3.0 and has no restriction on building height.
- 4.2.2 To the immediate northwest of the application site is zoned “Government, Institution or Community (1)” (“G/IC(1)”) and permits developments to a maximum building height of 164mPD.
- 4.2.3 To the immediate south is the Ebenezer New Hope School, also zoned as “G/IC” and has no limit on development.
- 4.2.4 Further to the south is an area zoned as “R(C)6” which is limited to 12 storeys in addition to 1 storey of carports and a maximum building height of 137mPD. However, in the southern-most portion of this “R(C)6” zone is an existing 20 storeys above podium residential building, Woodbury Court, at 137 Pok Fu Lam Road. All these existing developments are above the level of Pok Fu Lam Road.
- 4.2.5 Further north by the junction of Pok Fu Lam Road and Sassoon Road are areas zoned “G/IC”, which comprises the Queen Mary Hospital on the west side of Pok Fu Lam Road and the University of Hong Kong Faculty of Medicine buildings along Sassoon Road.
- 4.2.6 In general, the developments in the neighbourhood are taller and more intensively developed than the existing Ebenezer buildings or the proposed development in this application.

5. Planning History

- 5.1 The application site has been subject to a long history of rezoning proposals to enable the redevelopment of the site for residential purposes. This would subsequently support the relocation of Ebenezer and the provision of a new school and home with state-of-the-art facilities for the visually impaired. The most recent S.12A application (no. Y/H10/14) was partially agreed by the Town Planning Board (TPB) on 6 May 2022 to rezone the site to “Residential (Group C)7” (“R(C)7”) zone for a residential development (TPB reference no. Y/H10/14). This was subsequently incorporated as proposed amendments in the draft Pok Fu Lam OZP No. S/H10/20. On 30 May 2023, the Chief Executive in Council approved the draft OZP incorporating the rezoning of the subject site to “R(C)7”, and is now reflected on the Approved Pok Fu Lam Outline Zoning Plan No. S/H10/21.
- 5.2 Following the rezoning of the site, this S.16 application is made in accordance with the Notes of the “R(C)7”, to submit the required layout plan and associated information for the proposed residential development at the site. In effect, this would provide an implementable scheme and thus, moving a step closer to enabling Ebenezer’s relocation and the construction of a new school for the visually impaired.

6. Land Matters

- 6.1 The application site is known as RBL No. 136 RP. It was granted to the Hildesheim Mission to the Blind in 1930 and is an unrestricted lease other than a prohibition on offensive trades. The Mission has built the School and Home on the site and operated such premises since the time of the grant. The registered owner of the lot is now The Ebenezer School and Home for the Visually Impaired Limited.
- 6.2 The Mission is the holder of the adjacent lot RBL 1015 which was granted by Private Treaty in 1977 and is occupied by the Ebenezer New Hope School. This lot is not part of the application site.
- 6.3 Under the lease, the requirement for a 3m wide footpath / means of escape (MOE) around the boundary of the site is a significant constraint on the design of the development. (see **Figure 9**) As a result, this is one of the factors that results in the need for a minor relaxation of the BHR.

7. Reason for Proposed Minor Relaxation of BHR

7.1 Following the S.12A stage, in devising an implementable scheme that would comply with various technical requirements, it was found that all of the GFA permitted under the “R(C)7” zone would not be achievable with the current BHR of 151mPD. This is due to a number of technical requirements that place a constraint on the design and layout of the scheme. Some of the key technical requirements are outlined below.

7.2 Dedication of Land for Public Footpath Widening

7.2.1 During the S.12A stage for the redevelopment of this site (no. Y/H10/14), one of the comments received from Transport Department was to incorporate the widening of the public footpath on the western side of Pok Fu Lam Road abutting the application site boundary. In response, the Applicant (Ebenezer) proposed to widen the public footpath to 2.5m, which was accepted by the Town Planning Board at the S.12A stage. Accordingly, the Applicant is proposing the same widening of public footpath in the current S.16 application. (**Figure 9** and **Figure 10**) This widening will create a safer and more pleasant walking environment for the neighbourhood and the general public.

7.2.2 As a result of this proposed widening of public footpath, the land area for which the Applicant can develop on is reduced. More specifically, in accordance with the Building (Planning) Regulations and PNAP APP-108, 40 sqm of the applicant’s private land lot is proposed to be dedicated for public passage. The applicant will apply to claim 200 sqm of non-accountable bonus GFA subject to Building Department’s approval, which will be sought at the detailed design stage.

7.2.3 A minor relaxation of the BHR of 13mPD (from 151mPD to 164mPD) is therefore partially required to accommodate the bonus 200 sqm GFA.

7.3 Geotechnical Access Requirements

7.3.1 There are a number of geotechnical features that are wholly or partly within the application site boundary (**Figure 11**). These features restrict the development area of the site as the design of the proposed development has been configured in such a way that would minimise the effect on these features.

7.3.2 Due to geotechnical concerns, and for the maintenance of the widened footpath, a 2.5m wide maintenance walkway is needed and is proposed within the application site adjacent to Pok Fu Lam Road. This further reduces the land area available for development.

7.4 Compliance with Sustainable Building Design Guidelines

- 7.4.1 A building gap of about 8m is proposed between Block T3 and T4 to ensure that the proposed development fulfils the building gap requirement set out in PNAP APP-152, Sustainable Building Design Guidelines (SBD). The proposed building gap enables the permeability of low zone to be above 20%, which exceeds the minimum requirement outlined in the SBD Guidelines.
- 7.4.2 A greenery coverage of 20.1% is also proposed in compliance with SBD Guidelines and DEVB Technical Circulate (Works) No. 3/2012.

7.5 Building Setback Requirements

- 7.5.1 To comply with the air quality and noise standards set out in the Hong Kong Planning Standards and Guidelines (HKPSG), a building setback is proposed to create a 20m buffer separation from Pok Fu Lam Road. This buffer separation ensures that there is no window opening of habitable rooms within 20m from kerb side of Pok Fu Lam Road.
- 7.5.2 The proposed buildings are setback from Pok Fu Lam Road by 10 - 20m, and setback from the adjacent Ebenezer New Hope School by at least 20m. The building setbacks are proposed for better air ventilation.

7.6 Collectively, these reasons relating to the proposed widening of footpath, geotechnical requirements, proposed maintenance walkway, proposed building gap and greenery coverage to comply with SBD Guidelines, and proposed building setbacks, all restrict the development area within the application site. As a result, the proposed buildings need to be expanded and a minor relaxation of BHR from 151mPD to 164mPD is therefore proposed.

7.7 Adjacent Building Height Restriction

- 7.7.1 Careful consideration has been undertaken to relate the proposed development to the adjacent GIC development at the site east of 3 Sassoon Road. The BHR for that site is 164mPD, so the proposed development at the subject application site has a similar scale.

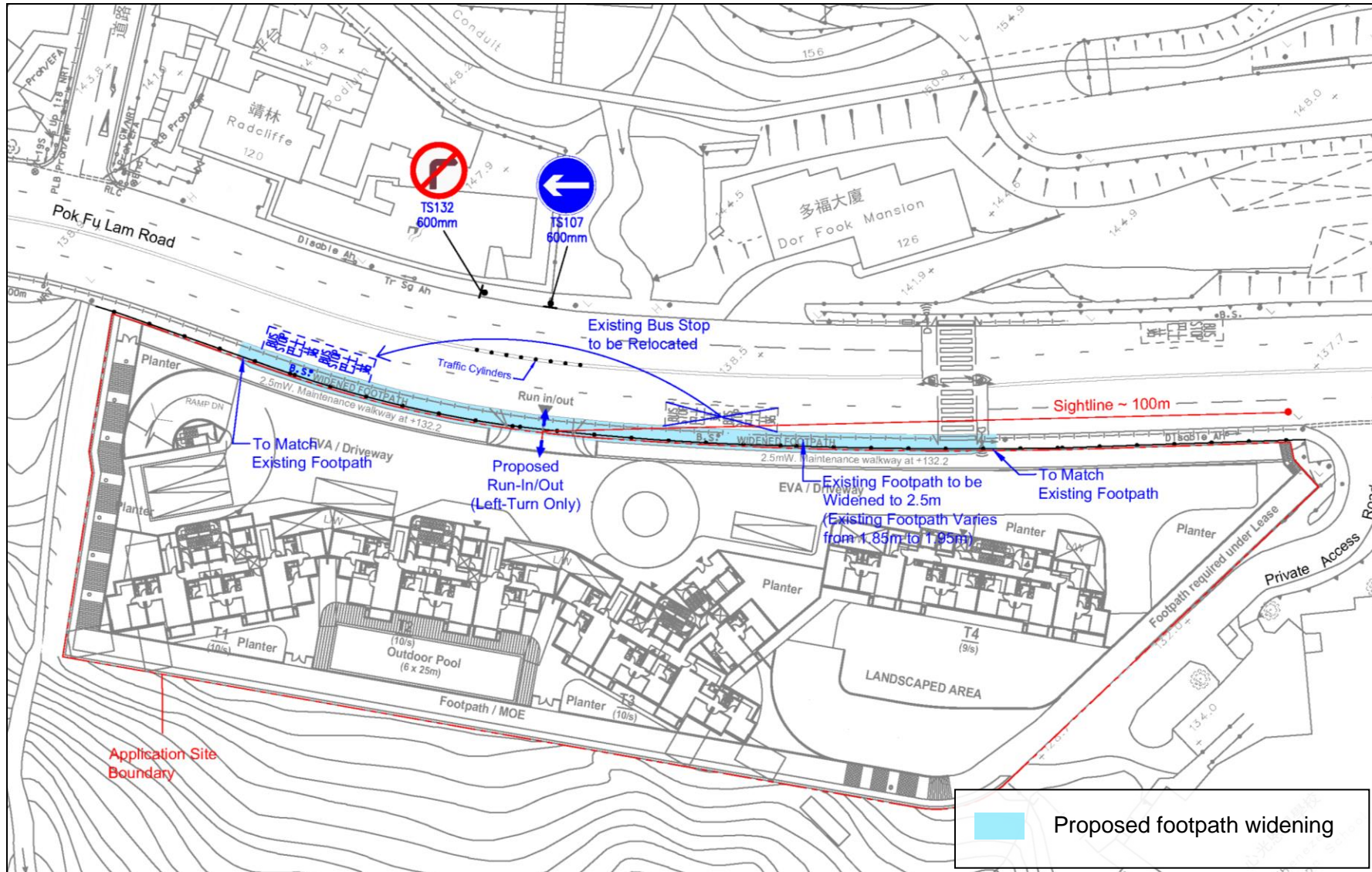


Figure 9: Proposed widening of public footpath on Pok Fu Lam Road to 2.5m

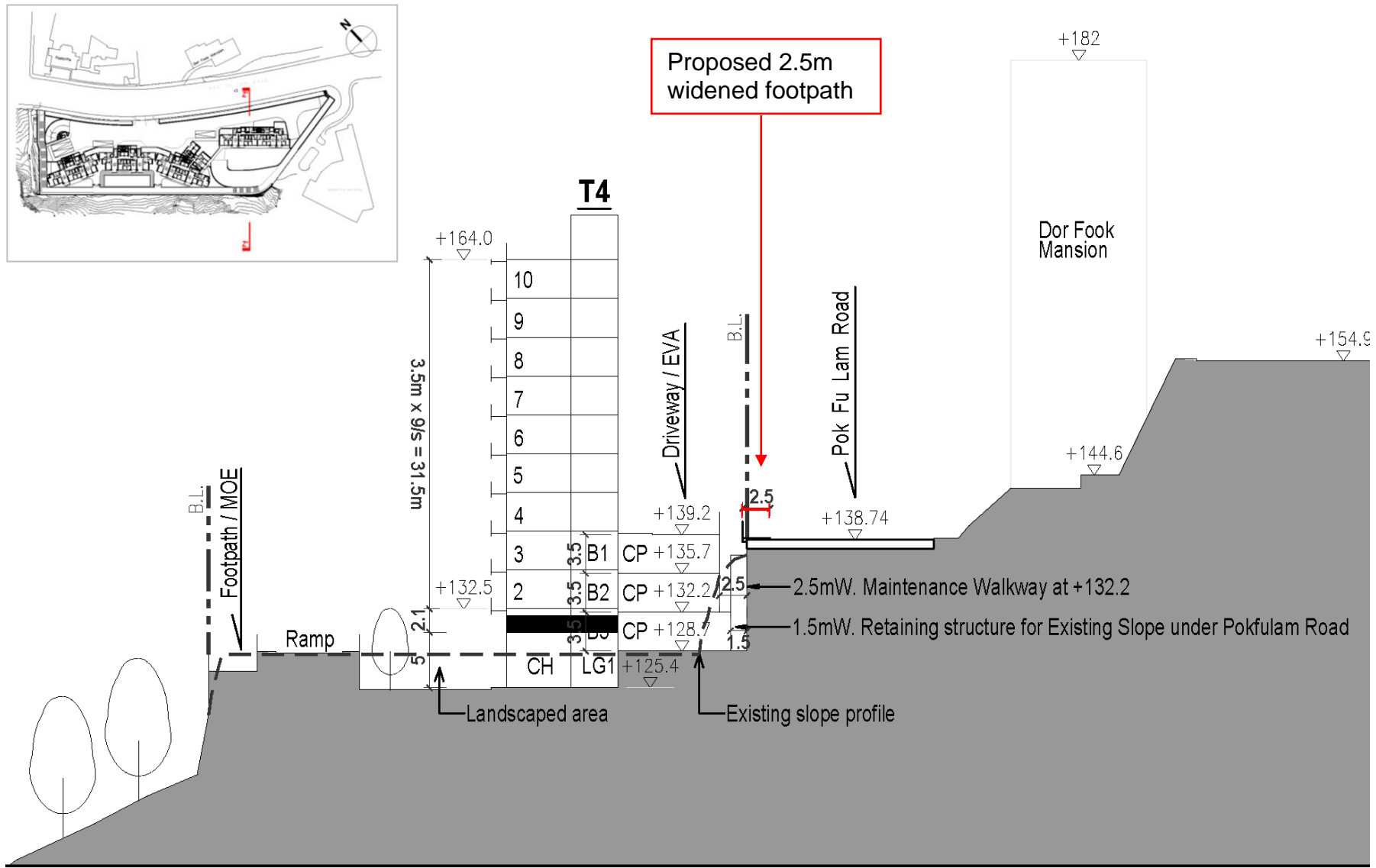


Figure 10: Section drawing showing proposed widening of public footpath on Pok Fu Lam Road

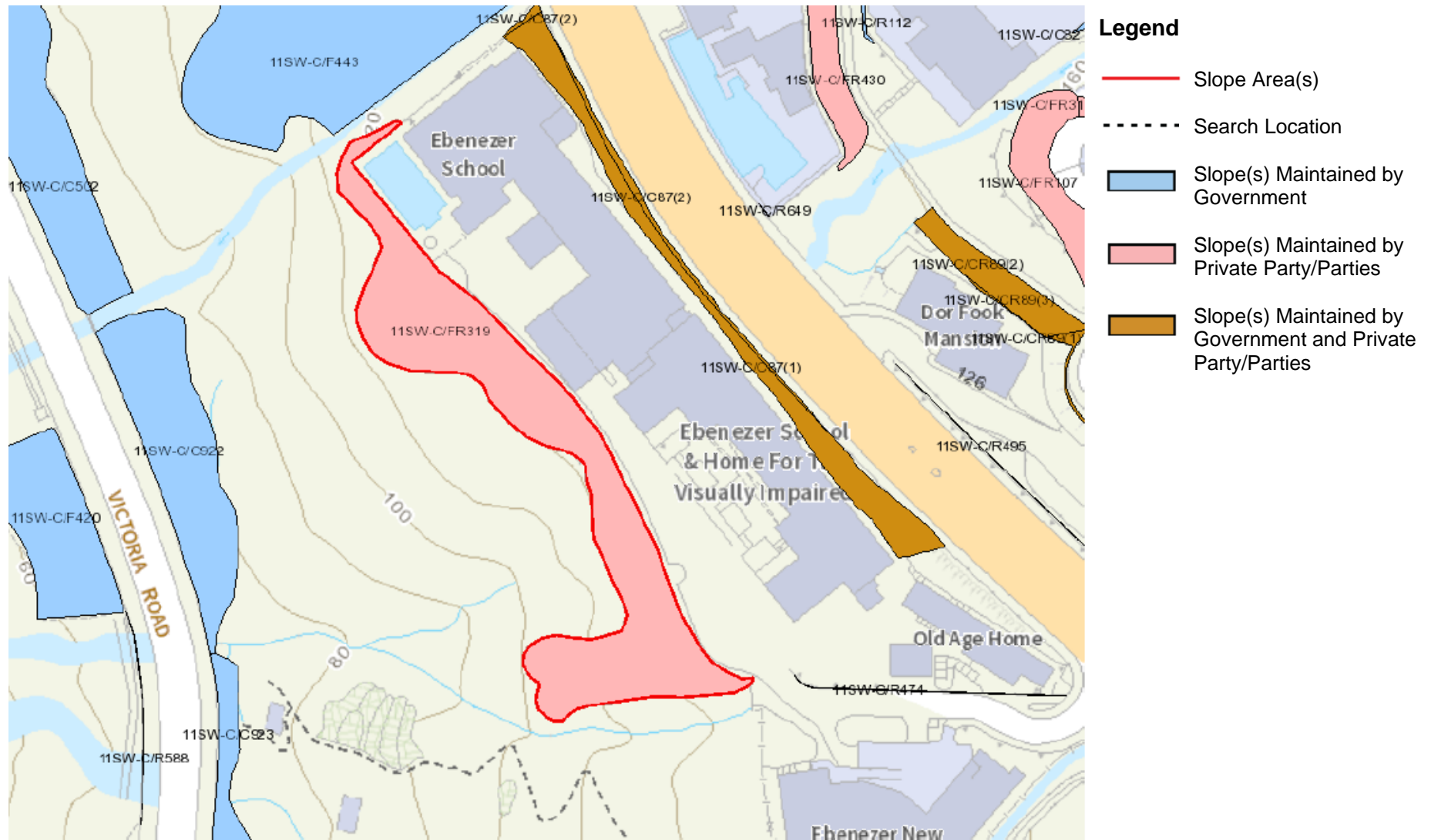


Figure 11: Geotechnical Features Located in the Vicinity of the Application Site including Features Wholly or Partly Within the Application Site

8. Proposed Scheme

- 8.1 The proposed scheme is a low- to medium-rise, medium-density residential development. It consists of four residential blocks of 9- to 10-domestic storeys atop one level of lobby, with a maximum building height of 164mPD. The buildings are set back from Pok Fu Lam Road with a building gap of about 8m between Block T3 and T4. Similar to the existing buildings, the proposed buildings will be constructed on a platform approximately 17 metres below the road level. This enables the buildings to be maintained at a relatively low level as seen from Pok Fu Lam Road, preserving public view and amenity, and the general character of the area.
- 8.2 Site access is proposed to be directly from Pok Fu Lam Road. As part of the proposed development, the existing footpath that varies in width from 1.85m to 1.95m along Pok Fu Lam Road adjoining the application site boundary, will be widened to a consistent width of 2.5m. This will improve the pedestrian environment for the general public. A supporting 2.5m wide maintenance walkway is also proposed adjacent to Pok Fu Lam Road footpath but at a lower level.
- 8.3 The total domestic gross floor area is not more than 12,274 sqm. and will accommodate a total of 135 residential units. Associated landscaping and amenity facilities such as a clubhouse and swimming pool also form part of the residential scheme. In addition, no.107 vehicle parking spaces and no.4 loading/unloading spaces will be provided to support the residential use.
- 8.4 As outlined in the Section 7 of this Planning Statement, the proposed bulk of the scheme will also accommodate 200 sqm bonus GFA from the footpath widening. The bonus GFA is subject to the approval of Buildings Department at the detailed design stage. The bonus GFA is not accountable, and the actual amount granted will depend on Buildings Department.
- 8.5 The indicative development parameters of the proposed scheme are set out in **Table 1** and **Figure 12** shows the proposed Master Layout Plan. A complete set of the architectural drawings is included in **Appendix 1**.

Table 1: Indicative Development Parameters

| Development Parameters | Proposed Scheme |
|--|--|
| Site Area | 6,460 m ² (about) |
| Domestic GFA | Not more than 12,274 m ² |
| Non-accountable Bonus GFA ³ | 200 m ² |
| Domestic Plot Ratio | Not more than 1.9 |
| Domestic Site Coverage | Not more than 33.33 % |
| No. of Blocks | 4 |
| Maximum Building Height (mPD) | Not more than 164 mPD |
| No. of Storeys: Block T1-T3 Block T4 | 11 storeys (incl. lobby level at LG2/F) 10 storeys (incl. lobby level at LG1/F) |
| Private Open Space | No less than 400 m ² |
| Greenery Coverage | No less than 20.1 % |
| Number of Units | 135 |
| Average Unit Size | About 90.9m ² |
| Recreational Facilities (Clubhouse) GFA | About 614 m ² |
| <u>Parking Provisions:</u> Private Car Spaces Motorcycle Spaces L/UL Spaces | 106 (including 5 accessible) 1 4 |
| Design Population (approximate) ⁴ | 392 |

³ The non-accountable Bonus GFA is subject to the approval of Buildings Department at the detailed design stage, and is excluded from the proposed domestic GFA of 12,274m².

⁴ Assuming a Person-Per-Flat ratio of 2.9, based on the average domestic household size in Southern District (reference: 2021 Population Census published by Census and Statistics Department)

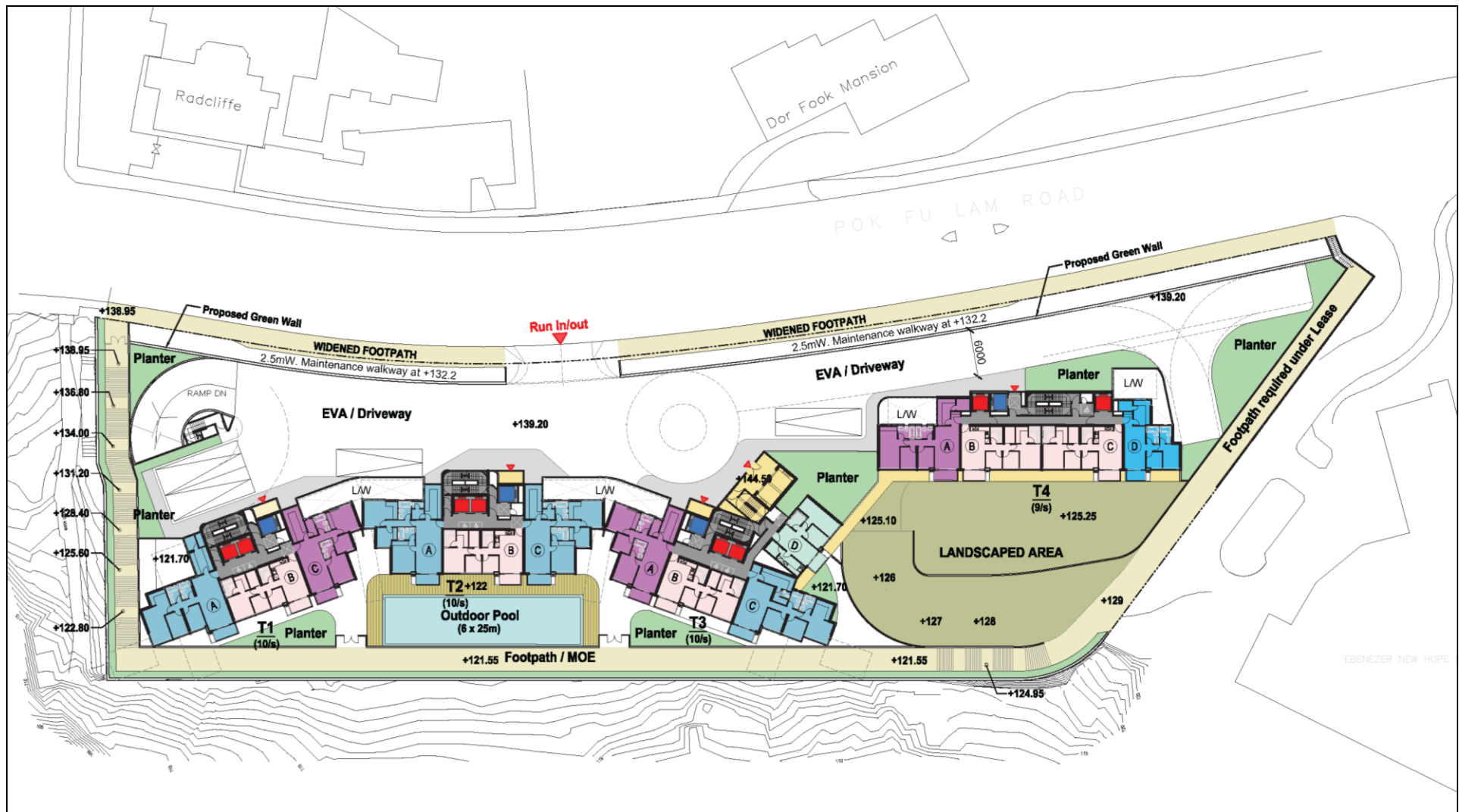


Figure 12: Master Layout Plan of the Proposed Residential Development (UG/F level)

8.6 Management and Maintenance of the Widened Public Footpath

- 8.6.1 It is proposed that the widened public footpath on Pok Fu Lam Road will be wholly managed and maintained by Highways Department. This management and maintenance proposal is subject to agreement with Highways Department at the detailed design stage.

9. **Transport and Traffic Aspect**

- 9.1 A Traffic Impact Assessment (TIA) has been undertaken to assess the traffic impact generated by the proposed residential development on the nearby road network. By comparing the performance of key junctions and road links of the 2037 Reference scenario (i.e. without proposed development) against the Design scenario (i.e. with proposed development), it was found that the amount of additional traffic to be generated by the proposed development is not significant, the differences in junction and road link performances between the Reference and Design Scenarios are small.
- 9.2 The assessment results indicate that all assessed junctions and road links in the vicinity of the Site would perform satisfactorily during the AM and PM peak periods for both the 2037 Reference and Design scenarios.
- 9.3 The proposed run-in/out is at Pok Fu Lam Road. To allow a 100m sight distance (between the proposed run-in/out and the Pok Fu Lam Road / access road to Ebenezer New Hope School junction), the existing northbound bus-stop is proposed to be relocated around 65m towards the north.
- 9.4 A total of 106 nos. of car parking spaces, 1 no. of motorcycle parking space and 4 nos. of goods vehicle loading and unloading bays will be provided within the development site in accordance with relevant the HKPSG requirements.
- 9.5 The number of pedestrians on the nearby footpaths at Pok Fu Lam Road will be reduced after the relocation of the existing Ebenezer School & Home for the Visually Impaired. Coupled with the proposed footpath widening for the benefit of general public, the conditions along the footpaths and at the bus-stop adjacent to the site would be improved after the development.
- 9.6 Based on the traffic impact assessment results, it can be concluded that the proposed development would not create adverse traffic impact on the surrounding road network. In addition, with the proposed footpath widening adjacent to the Proposed Development, the walking conditions along the footpath will be improved. Further details are contained in the Traffic Impact Assessment Study at **Appendix 2**.

10. Environmental Aspect

10.1 An Environmental Assessment (**Appendix 3**) has been carried out to assess the air quality and environmental noise impact in relation to the proposed development.

10.2 Air Quality Impact Assessment

10.2.1 As confirmed by field survey, there is no chimney identified within 200m from the application site.

10.2.2 The air sensitive uses in the proposed scheme can meet the buffer separation requirement with respect to nearest carriageways, as set out in the HKPSG. The development has been designed so that there is no window opening of habitable rooms within 20m from kerb side of Pok Fu Lam Road. For the clubhouse facilities, the fresh air intake location will be positioned to more than 20m apart as well. The outdoor swimming pool is located near the southwestern boundary of the application site and therefore also has over 20m setback from kerb side of Pok Fu Lam Road. Given that adequate buffer separation will be provided, no adverse air quality impact due to traffic emission is anticipated.

10.2.3 There is no fluff, odour and other air pollutant emission identified in the surrounding.

10.2.4 In light of the above, it is envisaged that the proposed development would not be subject to significant air quality impact.

10.2.5 Furthermore, the nature of the proposed development is not environmental polluting. As such, no significant air quality impact arising from the proposed development is anticipated.

10.2.6 Best management practice will be adopted during construction of the project. Necessary mitigation measures as stated above and in "Recommended Pollution Control Clauses for Construction Contracts" where applicable will be applied so that emission during construction stage should be kept to an acceptable level.

10.3 Noise Impact Assessment

10.3.1 There is no industrial use in the surrounding and no noticeable noise from fixed noise source or industrial activities.

10.3.2 Potential noisy facilities of the proposed development will be designed so that they will meet relevant standard stipulated in the HKPSG. No unacceptable fixed noise impact due to the operation of the proposed development is anticipated.

10.3.3 The proposed development at the application site is likely affected by road traffic noise. In addition to single-aspect building design, fixed glazing, fixed glazing with maintenance window, and vertical acoustic fin are recommended. Furthermore, the

proposed 20 m separation between openable windows of habitable rooms and the kerb side of Pok Fu Lam Road would also minimise road traffic noise impact on the future residents. With the various mitigation measures proposed, all Noise Sensitive Receivers (NSRs) of the proposed development would be within the standard stipulated under HKPSG.

10.3.4 Best management practice will be adopted for the construction of the proposed development so that no significant noise impact is anticipated.

10.4 It should be noted that the required 20m buffer separation for minimising air quality and traffic noise impacts to acceptable levels, places a constraint on the design and layout of the proposed residential scheme and thus, a constraint on fully achieving the permitted GFA under the current BHR of 151mPD.

11. Air Ventilation

11.1 A qualitative assessment on the air ventilation performance (AVA-EE) of the proposed development has been carried out and is attached at **Appendix 4**.

11.2 According to the findings of the AVA-EE, the annual prevailing wind comes from E, ENE and NE directions, while the summer prevailing wind comes from SSW, S and SSE directions. After considering the potential ventilation impacts on the application site of the proposed development, the layout of the proposed development has been formulated with due considerations on the air ventilation aspect.

11.3 By considering the existing topography and the location of the existing built area, it is likely that annual prevailing ENE and NE wind availability has been reduced due to existing buildings to the northeast while annual prevailing E wind is less obstructed. The summer prevailing wind is also less obstructed.

11.4 The proposed scheme has incorporated various effective mitigation measures. These include a change of building disposition to widen the building separation between the development and the nearest building, Ebenezer New Hope School, from 15m to 20m; and incorporating a building setback from Pok Fu Lam Road of at least 10m, which is a further setback compared to the existing Ebenezer buildings. The 10m setback is proposed so that wind from south to west direction can flow over the building mass and then reach the pedestrian level on downwind direction easier. In addition, a building separation of about 8m is also proposed between T3 and T4, which allows SSW and S wind to penetrate through towards the downstream area. It is likely that these good design features can offset any negative ventilation impact (if any) due to the slight increased building height.

11.5 With the good design features and mitigation measures proposed, the AVE-EE has found that the proposed scheme would result in an improvement of air ventilation among the pedestrian areas in the surroundings when compared to the Baseline

Scheme (existing condition with Ebenezer School buildings). This includes improvement among the pedestrian areas on Pok Fu Lam Road and on the access road to Ebenezer New Hope School.

- 11.6 It is therefore expected that the proposed development would not result in any worse-off impact on air ventilation.
- 11.7 However, as a consequence to ensuring that there would not be any worse off impact on air ventilation, the proposed mitigation measures, such as building gaps and setbacks, place constraints on the design and layout of the proposed residential scheme.

12. Sewerage

- 12.1 According to the accompanying Sewerage Impact Assessment (**Appendix 5**), the existing sewage flow within the application site is approximately 95.20 m³/day (Average Dry Weather Flow) (ADWF) and 3.17 m³/day design flow for swimming pool backwashing, with total peak discharge of 8.85 l/s. The estimated sewage to be generated from the proposed development is approximately 192 m³/day (ADWF) and 3.66 m³/day design flow for swimming pool backwashing, with total peak discharge of 17.82 l/s.
- 12.2 Sewage generated from the proposed development would be conveyed to the public sewerage networks by pumping within the application site, leading to the Sandy Bay Preliminary Treatment Works (SBPTW). The treatment capacity of SBPTW is considered sufficient to handle the flow from the application site.
- 12.3 The proposed strategy is considered feasible in terms of regional sewerage strategy, land and construction considerations. The proposed development is considered sustainable in terms of sewerage.

13. Drainage

- 13.1 A Drainage Impact Assessment has been undertaken (**Appendix 6**) and it is found that after development, there is no change in surface runoff discharging into the downstream drainage system as the application site is currently paved. Therefore, the drainage impact is considered insignificant.
- 13.2 Internal drainage works are proposed to properly convey the surface runoff from the application site by 500 mm u-channel for discharge to the existing natural stream via a 525 mm dia. outlet drain, following the existing flow path for discharging to the sea.

14. Geotechnical

- 14.1 The Geotechnical Planning Review Report (**Appendix 7**) has provided a review of how the geotechnical features in the vicinity, such as retaining walls and/or slopes shown on the plan may affect, or be affected by, the proposed development. It has discussed all the relevant issues regarding the geotechnical assessment of the proposed development.
- 14.2 As can be seen from **Figure 11**, there are extensive geotechnical features located along the boundary of the site with Pok Fu Lam Road. Some of these involve Government structures related to the public road, while others are related to the private lot. As part of the development, the existing slope profile within the private lot will be modified. This quite complex arrangement of public and private responsibilities requires provision of maintenance access. A 2.5m wide maintenance walkway is therefore provided within the private lot. (see **Figure 12**)
- 14.3 All structures, utilities, slopes and retaining walls affecting or being affected by the proposed development will be assessed in the detailed design stage. If necessary, upgrading works will be carried out to ensure that the slopes and retaining walls will not be adversely affected.
- 14.4 With reference to the preceding discussions, it is considered that the proposed development is geotechnically feasible.

15. Tree Preservation

- 15.1 As part of the Tree Preservation Proposal enclosed at **Appendix 8**, a Tree Survey has been carried out and identified 127 nos. trees within the application site boundary and in the area immediately around it. These trees are largely common native species. There are no rare or protected tree species. None of the existing trees are registered Old and Valuable Trees (OVT). One tree (T58) outside the application site boundary with DBH slightly over 1m is considered as a potentially registerable OVT/ potential Tree of Particular Interest and is proposed to be retained.
- 15.2 The proposed development has sought to minimise disturbance to the existing landscape and hence the future development context through the retention of as many of the existing trees in-situ as possible. 89 nos. of the 127 nos. existing trees will be retained in-situ, which equates to approximately 70%. Following a thorough assessment on the feasibility of tree transplantation, it was found that 8 nos. trees make good candidates for transplantation.
- 15.3 Despite the efforts to retain as many of the existing trees as possible, 30 nos. trees will be affected by the proposed scheme and are recommended for felling. This includes one dead tree on the slope within the Application Site boundary. The tree felling recommendation is based on a range of factors including their species, form, condition,

proximity to other trees, predicted survival rate and their lack of contribution to the future landscape character and amenity of the development. 3 nos. of the 30 nos. affected trees are the invasive weed species *Leucaena leucocephala* (銀合歡) and so may be removed in accordance with Lands Department Practice Note 6/2023 without the need for compensatory tree planting.

- 15.4 The planting proposals have sought to compensate for the loss of existing trees but also enhance the future landscape character of the Proposed Development. The current scheme has achieved a new tree planting ratio of no less than 1:1 in terms of tree numbers.
- 15.5 A summary of the trees to be retained, transplanted, felled and compensated is set out in **Table 2 and Table 3** below.

Table 2: Summary of Tree Recommendations

| Recommendation | Number of Trees | % of existing trees |
|-------------------------|-----------------|---------------------|
| Tree to be retained | 89 | 70% |
| Tree to be transplanted | 8 | 6% |
| Tree to be felled | 30 | 24% |
| Total | 127 | 100% |

Table 3: New Tree Planting Ratios

| New Tree Planting Metrics | Statistic / Ratio |
|---|---|
| Number of felled trees | 30 (including 3 nos. of <i>Leucaena leucocephala</i>) |
| Number of new trees | No less than 27 |
| New Tree Planting Ratio (by number) (Number of newly planted trees : number of trees felled) | 1 : 1 (27: 27) |

16. Landscape Master Plan

- 16.1 A Landscape Master Plan (LMP) has been prepared (**Appendix 9**) and is shown at **Figure 13**. The design objectives for the LMP include are to:
- Create a distinctive landscape which responds to the existing context, the architectural scheme proposals and the future residents, to create a sense of community;
 - Integrate the proposed development from a landscape and visual perspective with the existing and planned landscape context;

- Provide visual integration in views of the proposed building mass from the surrounding areas and provide vegetation screening and softening of the built-form in closer low-level views;
- Provide a quality, sustainable and accessible living environment for the enjoyment of the residents and visitors;
- Provide recreational spaces for the future residents; and
- Maximise opportunities for greening measures utilising tree and shrub planting and lawn and climbing plants within the new landscape.

16.2 Landscape boundary treatment is one of the many landscape design components proposed. This includes a 2.5m high vertical greening along the fence wall facing Pok Fu Lam Road. As opposed to the existing situation which mainly consists of concrete structures, the green wall will enhance the appearance of the development and soft the form of the structure. It is designed to reduce the apparent visual mass of the structure, maximise the area of visible greenery while also creating a more pleasant visual experience for pedestrians using the pavement alongside Pok Fu Lam Road.

16.3 The proposed development will include no less than 400 sqm of uncovered open space for residents' use. Given a design population of approximately 392 persons, the open space provision is adequate and in accordance with the HKPSG requirement of 1sq.m per person. The proposal will also provide no less than 1,299 sqm of greening (no less than 20.1% green coverage), which is in accordance with the Buildings Department Practice Notes PNAP APP-152 Sustainable Building Design Guidelines and DEVB Technical Circular (Works) No. 3/2012.

17. Visual Impact

17.1 A Visual Impact Assessment (VIA) has been carried out (**Appendix 10**). A number of visual mitigation measures are proposed during the construction and operational phases of the project, as outlined in the VIA. More specifically, operational stage landscape and visual mitigation measures include two key levels of approach, the primary and secondary mitigation.

17.2 The primary mitigation measures are based on the design, disposition, orientation and overall form of the Proposed Scheme. This includes the following measures:

- Introduction of a responsive building form with the Proposed Scheme with a building height (+164 mPD) and visual mass not significantly greater than the existing Ebenezer School or the Accepted S.12a Scheme (+151 mPD) to minimise changes to the existing visual context and maintain all direct views from publicly accessible locations;
- Block disposition and orientation designed to minimise a potential wall effect;

- Articulation of the block façades to create areas of light and shade and further reduce the visual mass of the combined frontage;
- Creation of a building setback from Pok Fu Lam Road maximizing the distance from adjacent residential developments and allowing the enhancement of the Pok Fu Lam Road corridor through the introduction of new tree planting;
- Building orientation and footprint designed to minimise the visual mass of the proposed residential blocks.

17.3 Meanwhile, secondary mitigation measures during the operation stage include the following:

- Other measures, such as the use of colour and finishes for the architectural façade for the structures to minimise the prominence of the scheme. This includes the use of colour blocking, working with the massing and articulation of the structures.
- Landscaping including the use of extensive vertical greening on the fence wall lining Pok Fu Lam Road and introduction of new tree planting within the Application Site to break up the horizontal visual emphasis of the Proposed Scheme.
- Utilisation of a combination of heavy standard trees and palms creating a more mature landscape with an immediate effect.
- Introduction of comprehensive urban design parameters as part of the detailed design stage of the project, to establish the future character of the development from an architectural and landscape perspective. This includes the use of high quality hard and soft landscape measures including water features, sculpture, site furniture, lighting and seating.

17.4 Within the VIA, the selection of vantage points has been comprehensive, covering all of the potential viewing angles from publicly accessible locations. As is clearly demonstrated by the photomontages there are only a few locations from where the Proposed Scheme can be seen in its entirety. In many of the locations, views of the proposals are obscured to some degree by a combination of the intervening landform, mature vegetation and built structures. In the few locations where there will be views of the proposals, these are largely partial, with the central and upper portions of the Proposed Scheme being visible. (**Figure 14 and 15**)

17.5 When viewed from the selected vantage points the Proposed Scheme fits relatively comfortably within its context. This ‘comfortable fit’ is in part due to the scale of the proposals and the architectural enhancement measures designed into the Proposed Scheme. It would be unrealistic to think that there would be no adverse impacts. However, this must also be considered in terms of the nature and extent of existing and future views. The predicted visual impacts for the vantage points mainly range from negligible to slightly adverse. In some of the more distant views, such as vantage point VP03, the view looking north east from Cyberport Waterfront Park, the Proposed

Scheme would replace the existing development without leading to any significant additional visual impacts. From vantage point VP 02, the view looking north west from Pokfulam Road and VP 06 the view looking south east from the footbridge the impacts would be more pronounced than the Accepted S.12a Scheme owing to the increased BH. However, these impacts are not considered too significant.

- 17.6 Through the adoption of various landscape and visual mitigation measures, including responsive architectural design, the implementation of the proposals would not significantly detract from the existing landscape and future visual amenity of the local area. As such the proposals are considered to be visually compatible with their existing and future urban context.

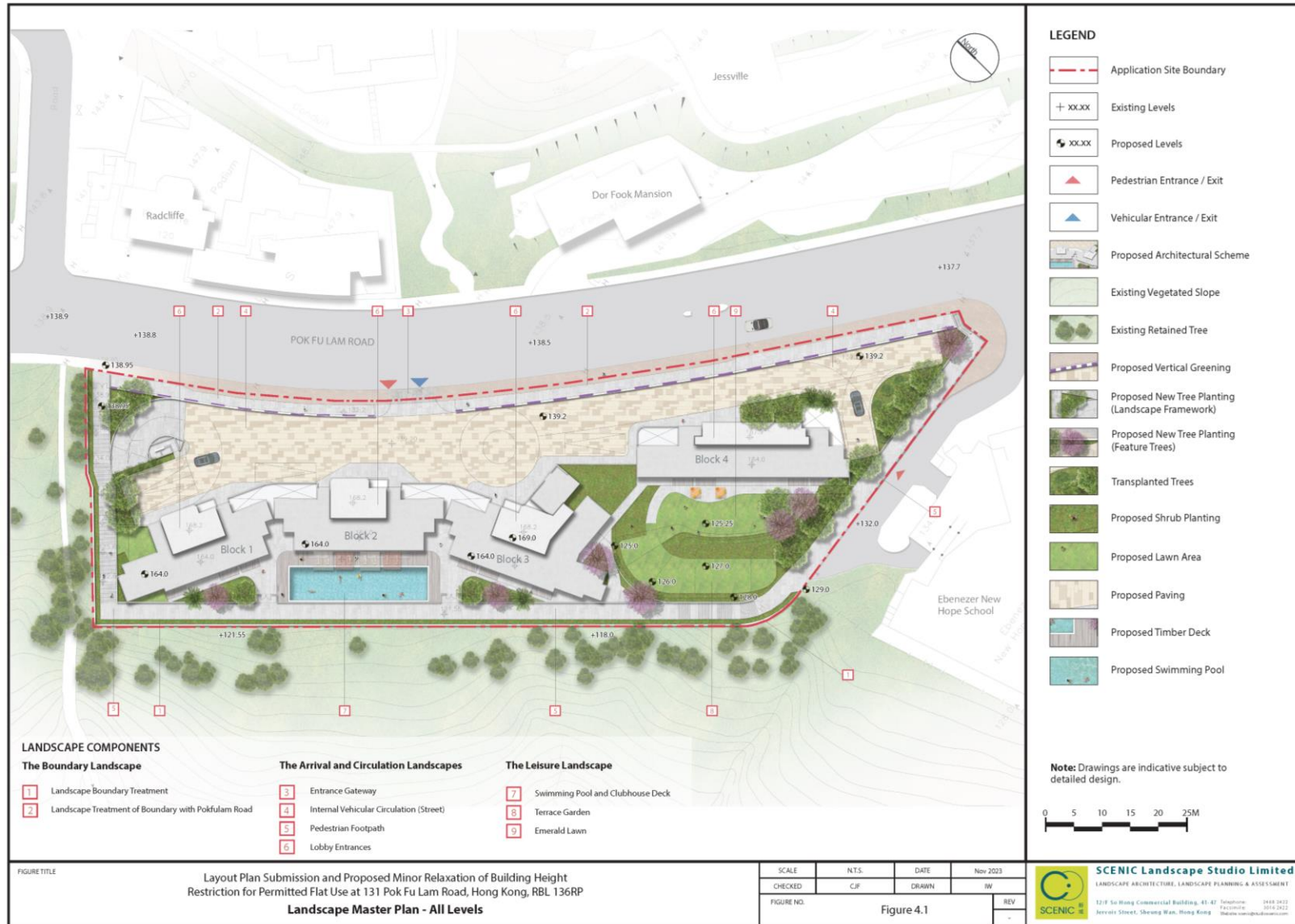
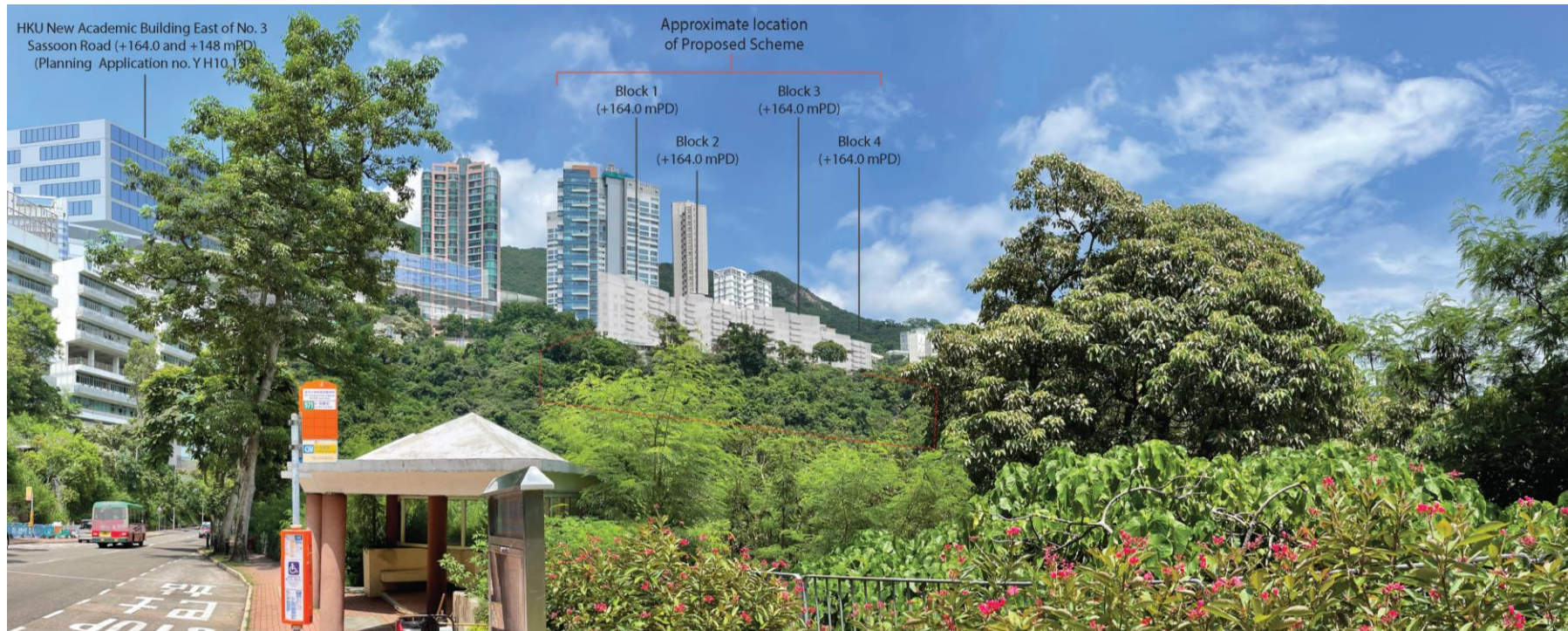
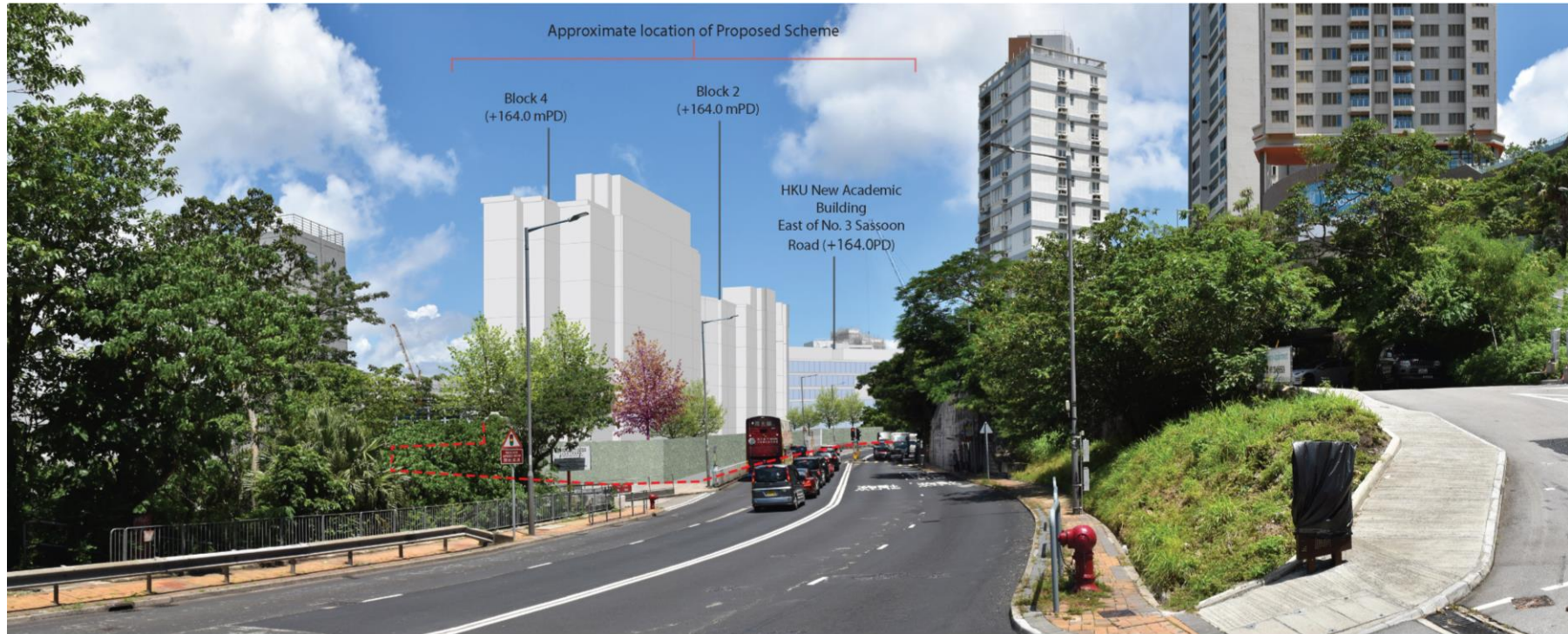


Figure 13: Landscape Master Plan



Vantage Point 05: View looking north east from Victoria Road (Year 10 with HKU New Academic Building at No. 3 Sassoon Road)

Figure 14: VIA Vantage Point 05, view of Proposed Scheme looking north east from Victoria Road



Vantage Point 02: View looking north west from Pokfulam Road (Year 10 with HKU New Academic Building No.3 Sassoon Road)

Figure 15: VIA Vantage Point 02, view of Proposed Scheme looking north west from Pok Fu Lam Road

18. Planning Assessment and Justifications

18.1 In line with the OZP Planning Intention

18.1.1 The proposed residential use falls in line with the Column 1 Flat use of the “R(C)” zone, which is always permitted. The proposed low- to medium-rise and medium-density residential development is also in line with the planning intention of the “R(C)” zone.

18.2 In line with the OZP Remarks of the “R(C)7” zone

18.2.1 The submission of a layout plan is included in this S.16 application, in compliance with Remark (3) relating to the “R(C)7” zone. The proposed land uses, and the form, disposition and heights of all buildings to be erected on the site, as well as the proposed total gross floor area for various uses and facilities are provided in this Planning Statement and illustrated in the attached architectural drawings at **Appendix 1**.

18.2.2 An Environmental Assessment report and a Sewerage Impact Assessment report are also included in this submission, attached at **Appendix 3** and **6** respectively, in accordance with Remark (3)(iii) and (iv) of the “R(C)7” zone.

18.2.3 As outlined in Section 10 of the Planning Statement, the Environmental Assessment concluded that with the proposed appropriate mitigation measures, it is envisaged that the proposed development would not be subject to significant air quality impact. In terms of traffic noise impact, all Noise Sensitive Receivers of the proposed development would also be within the standard stipulated under HKPSG after mitigations.

18.2.4 In terms of sewerage, the Sewerage Impact Assessment found that the proposed development would not cause any sewerage problems. The sewerage generated from the proposed development would be conveyed to the public sewerage networks, leading to the SBPTW which is considered to have sufficient treatment capacity to handle the flow from the application site.

18.3 Compatible Land-Use Function with the Surroundings

18.3.1 The site is located in a predominantly residential area. The piece of land on the opposite side of Pok Fu Lam Road is zoned as “R(C)” with existing residential developments. The land to the south of the application site is also zoned as “R(C)6”. These reflect the residential character of the area, in which the proposed residential development is compatible with.

18.3.2 The predominant form of development in the area is high quality residential development and the proposal in this application is to reinforce that use by enabling

the development of a high quality, well-designed but relatively small residential development footprint on this site. The proposal will therefore provide additional high-quality flats in an area which has been progressively redeveloped for high quality residential developments.

18.3.3 With the “Green Belt” (“GB”) zones to the east, the site is partially surrounded by woodlands and greenery. This will provide a comfortable and quality living environment for future residents. The proposed residential use will not encroach onto the “GB” zone. Therefore, in addition to its compatibility with the surrounding residential uses, the proposed residential development and the nearby areas of greenery and woodlands will also be compatible and will complement one another.

18.3.4 From a wider perspective, there is also an existing mix of residential and GIC uses in the area. This is mainly made up of the cluster of HKU buildings on Sassoon Road, the Queen Mary Hospital Complex, and the residential developments at Royalton I, Royalton II, Radcliffe, Jessville and Dor Fook Mansion. These two types of land uses have co-existed in harmony throughout times and are seen to be compatible with one another. In view of the adjacent planned HKU development at the “G/IC(1)” site as well as the GIC use of the Ebenezer New Hope School, the proposed residential development would contribute positively to this existing mix of land uses. As such, the proposed development would be compatible with the existing and future surrounding context.

18.4 Compatible with the Existing Building Height Profile of Surroundings

18.4.1 The existing Ebenezer buildings are of a much lower building height compared to the surrounding buildings. The proposed increase in building height of only 13m (from 151mPD to 164mPD) will maintain this relationship with its surroundings, and will not overwhelm the surrounding built environment in this respect.

18.4.2 The site is surrounded by medium- to high-rise developments, which are of a much greater height than the existing Ebenezer building. This includes the residential developments of Royalton I and II (216mPD), Radcliffe (216mPD), Dor Fook Mansion (182mPD) and Jessville Tower (227mPD) that are generally more than 20 storeys in height located on the eastern side of Pok Fu Lam Road; the proposed and existing institutional buildings of HKU (132.7mPD to 187.7mPD) and Queen Mary Hospital (176mPD to 300mPD) to the north and northeast; as well as the HKU staff quarters and apartments and the residential development of Woodbury Court to the south of the site. The current proposal comprising a low- to medium-rise, medium-density residential development with a maximum building height of 164mPD and only 10 to 11 storeys will therefore be compatible with the existing building height profile. At the same time, the proposed buildings will maintain the existing condition as it is of a lower building height profile than the surrounding buildings.

18.4.3 The surrounding area is generally hilly, sloping from the east towards the sea in the west. Currently, the existing building height profile of the existing Ebenezer building and the residential developments on the eastern side of Pok Fu Lam Road generally follows this natural sloping profile of the area. The buildings on the eastern / uphill side of Pok Fu Lam Road are taller, whilst buildings, including the existing Ebenezer building, on the western side of Pok Fu lam Road are generally of a lower building height. The proposed building height of 164mPD will maintain this existing building profile created with the surrounding buildings. The proposed development will be lower than those buildings on the opposite side of the road, aligning with the natural sloping profile that descends towards the west.

18.5 Extent of Relaxation is Appropriate

18.5.1 The proposed minor relaxation of BHR takes into consideration the planning and site context. The proposed building height of 164mPD is consistent with the BHR at the adjacent "G/IC(1)" site to ensure that the proposed development is in-keeping with its surrounding context. The proposed development would remain as a low- to medium-rise development. This ensures that it is in harmony with the surrounding environment and buildings, and that it does not overwhelm the existing development intensity and scale in the area, which generally consists of buildings with higher building heights. The extent of relaxation of the BHR is therefore considered appropriate.

18.6 Achieving Technical Requirements and All Permitted GFA

18.6.1 There are a number of technical requirements for the proposed residential development at the site. These requirements place constraints on the design and layout of the scheme, and the land available for development within the application site. The proposed minor relaxation of BHR from 151mPD to 164mPD facilitates the proposed development in meeting these technical requirements. These requirements include:

- i. Widening of public footpath in response to Transport Department's comments in the S.12A stage. This requires the dedication of 40 m² of private land within the application site, which may result in 200m² of bonus GFA subject to the approval of Buildings Department;
- ii. Requirement for a 2.5m wide maintenance walkway for access to the engineering structures supporting Pok Fu Lam Road (including the widened footpath);
- iii. Provision of sufficient space within the layout to meet access and parking requirements including swept paths;
- iv. Provision of 20m building setback from Pok Fu Lam Road to comply with air quality and noise standards under HKPSG; and
- v. Provision of building gaps (about 8m between T3 and T4; and 20m from Ebenezer New Hope School) and building setback (at least 10m from Pok Fu Lam Road) for better air ventilation and to meet SBD Guidelines;

- vi. Provision of a minimum 3m wide footpath / MOE around the application site boundary as required under lease; and
- vii. Provision of minimum 20% green coverage under SBD Guidelines.

18.6.2 The proposed minor relaxation of building height allows the proposed buildings to expanded without compromising the proposed development in meeting the technical requirements. It also enables the proposed development to achieve all of the permitted GFA on the site, and allows for greater flexibility to provide a better designed building at a later stage in the design process.

18.7 No significant adverse visual impact

18.7.1 The Visual Impact Assessment demonstrates that predicted visual impacts for the vantage points mainly range from negligible to slight adverse. It concluded that the proposals are considered to be visually compatible with their existing and future urban context.

18.8 Planning and Design Merits

Widening of Public Footpath

18.8.1 The public footpath on the western side of Pok Fu Lam Road abutting the application site boundary will be widened to 2.5m. This is a notable improvement from the existing footpath which varies from 1.85m to 1.95m in width. It is a public benefit as the widened footpath will provide a more comfortable, pleasant and safe pedestrian environment for the neighbourhood and the general public.

Improved Public Realm

18.8.2 Roadside planting such as the proposed green wall facing Pok Fu Lam Road will create visual interest and improve roadside amenity and views. This will greatly improve the current situation which mainly consists of a hard concrete structure. It will also subsequently further improve the walking environment for pedestrians.

Better Urban Design - Improved Building Disposition

18.8.3 The existing buildings of Ebenezer School and Home for the Visually Impaired consists of a smaller block for its Old Age Home located at the southern part of the site, and one large continuous block situated parallel and right alongside Pok Fu Lam Road. Together with the high-rise buildings on the opposite side of the road, a sense of enclosure is created on Pok Fu Lam Road. With careful design considerations for the proposed building disposition, the proposed scheme will improve the current situation. The proposed buildings are set back from Pok Fu Lam Road by 10m to 20m and to maximise this setback distance, T1 to T3 have adopted a shallow crescent disposition.

In addition to this, with only four blocks proposed (as opposed to five blocks proposed at the S.12A stage) a building gap of about 8m is also created between T3 and T4.

18.8.4 These design improvements provide visual relief, greater visual openness and daylight penetration on Pok Fu Lam Road. This would improve the amenity in this part of Pok Fu Lam Road and benefit the public as well as existing and future residents.

18.8.5 To further ensure that the living amenity and living quality for future residents are of a high standard, the proposed building setbacks ensure that air quality and traffic noise are at acceptable levels in line with HKPSG standards. The proposed building gaps also provide greater air ventilation into the application site.

Better Urban Design – Greenery

18.8.6 The proposed scheme will provide 20.1% of greenery coverage, in accordance with SBD Guidelines and DEVB Technical Circulate (Works) No. 3/2012. This includes the proposed green wall facing Pok Fu Lam Road. The proposed greenery will provide a more comfortable and healthier environment for the neighbourhood.

18.8.7 The proposed minor relaxation of only 13m enables these urban design improvements to be incorporated into the proposed scheme, particularly the building gap between T3 and T4. These design improvements are for the betterment of the neighbourhood as well as for providing a high living quality for existing and future residents.

Improved Sustainability through Reduction of Construction Waste

18.8.8 The excavation volume for the proposed scheme has been reduced as compared to the S.12A scheme, from about 50,400m³ to 47,000m³. The reduction of about 3400m³ excavation volume is enabled by the proposed minor relaxation of building height. As a result, the amount of construction waste arising from the proposed development will be reduced, ensuring a more sustainable development.

18.9 No adverse traffic impacts

18.9.1 As demonstrated by the Traffic Impact Assessment Study (**Appendix 2**), the proposed development would not create adverse traffic impact on the surrounding road network. In addition, the proposed footpath widening adjacent to the proposed development will improve the walking conditions along this part of Pok Fu Lam Road.

18.10 No adverse landscaping and tree impacts

18.10.1 The LMP and TPP has demonstrated that there would not be adverse impact to the landscaping and trees, as the majority of existing trees will be retained (70% of existing trees) or transplanted (6% of existing trees). For the minimal number of trees recommended for felling, there will be 1:1 compensatory trees on the site. In addition,

the landscape design proposal will create a distinctive landscape that compliments the existing context, the architectural buildings and enable a comfortable and pleasant living environment for the future residents.

18.11 Environmental, air ventilation, geotechnical, drainage and sewerage impacts are acceptable but constrain design options

- 18.11.1 The technical assessments have demonstrated that the proposed development would not have adverse environmental, air ventilation, geotechnical, drainage and sewerage impact to the surroundings. However, complying with these has created greater restriction on the design flexibility within the site. This restriction results in a need to increase the building height to achieve the permitted GFA.

19. Conclusion

- 19.1 This Section 16 application relates to a proposed residential development at 131 Pok Fu Lam Road, which is a site currently occupied by the Ebenezer School and Home for the Visually Impaired. The purpose of the S.16 application is for:
- i. The submission of a layout plan and related environmental assessment report for the proposed residential development; and
 - ii. A minor relaxation of the building height restriction (“BHR”) in the “R(C)7” zone from 151mPD to 164mPD.

Ultimately, this S.16 application, if approved, would secure an implementable residential scheme to enable Ebenezer’s relocation and the construction of a new school for the visually impaired.

- 19.2 The proposed scheme is a low- to medium-rise, medium-density residential development with associated clubhouse facilities, car parking and landscaping. It consists of four residential blocks of 9- to 10-domestic storeys atop one level of lobby, with a maximum building height of 164mPD. The proposed minor relaxation is only 13m greater than the BHR. It is not an excessive increase and the proposed scheme is considered to be visually compatible with the existing and future urban context.
- 19.3 The environmental assessment report, the geotechnical assessment and other technical assessments have identified constraints which have needed to be addressed in the layout of the development. The form, disposition and heights of the proposed buildings have been designed to address these constraints. The minor relaxation of BHR is proposed as a result of complying with the various technical requirements.
- 19.4 The design also enables a number of planning and design merits that would improve public realm, provide better urban design in the neighbourhood, enhance pedestrian environment for the public, enhance the living amenity and quality for the future and existing residents, as well as ensuring that a more sustainable development is implemented. One of the planning and design merits that would result in a significant public benefit is the proposed widening of public footpath on Pok Fu Lam Road to 2.5m wide. This would create a safer and more comfortable pedestrian environment for the public.
- 19.5 This Planning Statement, including the various technical assessments, have concluded that the proposal is compatible with the surrounding developments in terms of land use, scale, building height and form, and is technically acceptable. The S.16 application is therefore considered acceptable and the Board is invited to consider this application favourably.