

Proposed Minor Relaxation of Building Height Restriction for Permitted Flat Use in “Residential (Group C) 5” Zone at 105 Robinson Road, Mid-Levels West, Hong Kong (A/H11/107)

Departmental comments	Response to Comments
Comments from Landscape Architect, Planning Department: [Mr. Chak Man NGAI, Tel: 3565 3955]	
1(a) As no information on existing landscape resources (e.g. trees) is provided, potential impact to existing landscape resources within or adjacent to the site cannot be reasonably ascertained. The applicant is advised to confirm in the Planning Statement whether there are any existing trees within the site and if they would be affected by the proposed development.	The application site is a redevelopment of existing buildings. There were no natural landscape resources (e.g. trees) within the site.
1(b) The applicant is advised to make reference to para.27 of the guidance notes for application under s.16 for further details regarding the requirement of the landscape submission to support the application for development that may have impact/implications on the landscape.	Ditto. Refer reply to 1(c) & 1(e).
1(c) The applicant is advised to provide landscape layout plan(s) with self-explanatory information (e.g. legends, scale bar, sufficient spot levels for key landscape areas, major access points, retained/ transplanted/new tree plantings, and key dimensions of proposed works etc.) to illustrate the proposed greening and landscape treatments at different levels. Drawing numbers are also advised to be provided for easy reference.	Landscape layout plans (Dwg. No. LP_01, LP-02 & LP-03) are provided in Annex 1B to illustrate possible greening and landscape treatments for reference.
1(d) The applicant should be advised that approval of the application does not imply approval of tree works such as pruning, transplanting and felling under lease. The applicant is reminded to seek approval for any proposed tree works from relevant departments prior to commencement of the works.	Noted.
1(e) With reference to item 1 of the applicant's clarification in the supplementary information (i.e. "Greenery area (under BD definition) 35%"), the applicant is reminded that approval of the application does not imply approval of the site coverage of greenery requirements under APP PNAP-152. The site coverage of greenery calculation should be submitted separately to BD/LandsD for approval.	Noted. The minimum site coverage of greenery requirement under APP PNAP-152 is 20%. The site coverage of greenery provided in the application scheme is 35%, which is an enhancement in comparison to the minimum provision. The relevant

	calculation would be included in GBP submission to BD/LandD for approval.
Comments from Town Planner/Urban Design, Planning Department: [Mr. Daniel TANG, Tel: 3565 3942]	
3(a) To demonstrate the potential visual impact by relaxing the BHR from 161mPD to 215mPD, the applicant should prepare a visual impact assessment (VIA) according to TPB PG No. 41. In particular, the applicant is advised to compare the Proposed Scheme (i.e. proposed BH of 215mPD) with the OZP-compliant Scheme (i.e. BHR of 161mPD) in the VIA.	A Visual Impact Review (VIR) is included in Annex 2 to demonstrate our original visual analysis is negligible. There is no significant adverse visual impact to existing surrounding, in the contrary, it is considered visually compatible with the nearby buildings, as the subject proposal has been surrounded by tall buildings.
3(b) The applicant should also check whether the Site would fall within the view fan of any strategic viewing points (SVP) in Chapter 11 Urban Design Guidelines of the Hong Kong Planning Standards and Guidelines. If affirmative, the assessment of the visual impact as viewed from the relevant SVP(s) should also be included in the VIA.	The view fan of strategic viewing points had been checked against Figure 3 Vantage Points in Ch. 11 of HKPSG. The application scheme is only visible in VP 1. The demonstration of relevant SVP(s) has been included in the Annex 2 .
Comment from Chief Architect/Architectural Services Department: [Mr. Sherman SUM, Tel: 2582 5314]	
3(c) In order to enable our office to comment on the visual impact and the proposed design features (including greenery provision and build form), the applicant is advised to include some images/photomontages of the proposed development in its surrounding context from different vantage points to demonstrate whether the proposal and the design features would be visually compatible with the existing surrounding environment.	Refer to 3(a) above.
Comment from Transport Engineer/Hong Kong, Transport Department: [Mr. Vincent TAM, Tel: 2829 5407]	

4(a) The AP proposed 33 nos. residential car parking spaces in the development. The applicant should demonstrate that their proposed provision of internal transport facilities would comply with the requirement of HKPSG taking into account the site specific factor for determining GPS in the HKPSG.	The comments have been addressed by the FI (further information) submitted to DPO and TD on 8.12.2023 for 56 nos. of residential car parking spaces.
4(b) Refer to page 3 of TRR, adjustment ratio (R2) is assumed to be 0.75. Please justify with a figure showing the 500m-radius catchment.	Ditto.
4(c) The vehicular travelling directions as shown in the layout plans appears to be in the wrong direction. Please check.	Ditto.
4(d) At Ground Floor, the swept path of the ingress vehicle appears to run on the footpath near the crossing area. Please review the width of the driveway.	Ditto
4(e) The applicant shall provide suitable traffic management measures to control the one-way traffic arrangement between LG1 & LG2. The applicant should also consider the contingency plan during failure or routine maintenance of the car lift.	Ditto.
4(f) The applicant should evaluate the existing traffic conditions in the vicinity and assess the traffic impact to the nearby road network due to the proposed development.	Please refer to Chapter 4 of the Traffic Review Report. The comparison of the net traffic generated by the previously approved scheme in 17 March 2023 with the proposed scheme shows there is a minima and insignificant increase of 3 pcu/hr (2-way) during the peak hours.
4(g) The project team of the redevelopment had submitted proposals to demolish the existing retaining wall(s) between L/P 33850 to L/P 32295 such that the existing footpath of Robinson Road (width ~1m) can be widened with a provision of a new lay-by. However, such design was not mentioned or indicated on the layout plan appended in this application	Noted.
Comment from Environmental Protection Department: [Mr. Kelvin CHOI, Tel: 2835 1594]	
5(a) According to the information provided, the S.16 planning application is for the proposed minor relaxation of building height restriction, involving one residential block with proposed height of 215mPD. It is also noted that no technical assessment regarding environmental	The current site is of residential use, same use as the proposed scheme. The GBP was first approved 27 May 2022 and the

protection was submitted with this application. The applicant should note that a sewerage impact assessment shall be required to assess the sewerage impact from the proposed development.	corresponding drainage plan had been approved on 18 January 2023. A sewerage review calculation based on 270 units had been supplemented to DSD, and a revised calculation based on current application scheme (217nos.) had been attached in Annex 3B for reference.
Comment from Chief Engineer/Hong Kong & Islands, Drainage Services Department: [Mr. Johnny LAI, Tel: 3101 2360]	
6(a) To demonstrate that the downstream sewerage system will have sufficient capacity to cope with any additional discharge, the applicant's AP shall submit to Environmental Protection Department (EPD) and this department a design calculation. If necessary, the AP shall upgrade the immediate downstream sewerage system at his own cost and up to the department's satisfaction.	Refer to 5(a).
Comments from Head of the Geotechnical Engineering Office, Civil Engineering and Development Department: [Ms. Candy CHO, Tel: 2762 5383]	
The applicant is asked to review the following:	
7(a) The level of Robinson Road fronting the application site was not at a single level of +108.3mPD, but varies from about +105mPD (near the eastern site boundary location) to +109mPD (near the western site boundary location). Along the northern site boundary aligning with Robinson Road, the determined Bulk Excavation Limit (BEL) for the site varies from about +109mPD at the eastern end to +105mPD at the western end (refer to the enclosure extracted from BD's approved drawings). The BEL contours across the application site is from about +105mPD to about +121mPD as indicated in Section 4-4 of the BD's approved drawings, instead of from +104mPD to +118mPD as stated in para 2.3.2 of the Supporting Planning Statement.	Noted. The Application Site is subject to the Bulk Excavation Limit (BEL). Other than pilings, no building works with excavation can be built below the BEL. The level of Robinson Road fronting the application site varies from about +105mPD to +109mPD along the northern site boundary. Sections showing the level difference of application site with Robinson Road at western and eastern side

	<p>are attached in Annex 4. There are pile caps with depth of 1.5m – 2m below the lowest floor level. To avoid encroaching into the BEL, less than one-fourth of the site area at lowest floor level (+109.3mPD to +110.35mPD) could be built. The buildable area is in an elongated shape, The depth of the available floor space is no more than 10m to 11m. It is technically not practical to use the floor for car parking purpose.</p>
<p>7(b) Based on the observations above, the existing Robinson Road ground level at certain section around at the northern site boundary is higher than the BEL (i.e. a level difference of about 4m between BEL +105mPD and GL+109mPD there). Hence, the statement "the proposed residential towers have to be above Robinson Road" and the conclusion "the building structure cannot go deeper to allow ..." may not be totally correct. The applicant should further review the correctness of these statements with consideration of other non-geotechnical development constraints to explain why the towers have to above Robinson road and the building structure cannot go deeper.</p>	<p>Ditto.</p>

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