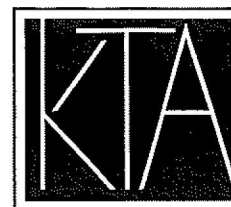


By Hand and Email

Our Ref: S3115/MARYKNOLL/24/003Lg

28 October 2024

Secretary, Town Planning Board
15/F, North Point Government Offices
333 Java Road
North Point
Hong Kong



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Dear Sir/Madam,

**Proposed Residential Development with Minor Relaxation of Plot Ratio, Building
Height and Site Coverage Restrictions
at 44 Stanley Village Road in Stanley
- S16 Planning Application –
TPB Ref.: A/H19/87
Further Information No. 1**

Reference is made to the captioned S16 Planning Application submitted to the Town Planning Board on 16 August 2024 and department comments received on 22 – 24 October 2024.

In response to the departmental comments received, please find attached 4 hard copies of the Further Information ("F.I.") submission. The submission document consists of:

Response-to-Comment Table

Appendix I Revised Drainage & Sewerage Impact Assessment

Appendix II Updated Landscape Drawings

Appendix III Water Demand Assessment

Appendix IV Revised Environmental Assessment


Should you have any queries in relation to the attached, please do not hesitate to contact Mr Kenneth To or the undersigned at [REDACTED].

Thank you for your kind attention.

Yours faithfully

For and on behalf of

KTA PLANNING LIMITED


Gladys Ng

Encl.

cc. the Applicant & Team

KT/GN/vy



FS 579819



**Proposed Residential Development with Minor Relaxation of Plot Ratio, Building Height and Site Coverage Restrictions
at 44 Stanley Village Road in Stanley**

- S16 Planning Application (TPB Ref.: A/H19/87) -

RESPONSE-TO-COMMENT TABLE

Comments	Response
<p><u>Comments from Chief Architect/ASC, Architectural Services Department:</u> <u>(Contact Person: Mr Sherman Sum, Tel: 2582 5314)</u></p> <p>2. Based on the information provided, it is noted that the PR and SC of the development are proposed to be relaxed from 0.75 to 0.9 and from 30% to 36% respectively, which are about 20% increase, subject to PlanD’s view.</p> <p>3. Also, noted that the current scheme has proposed an additional storey of East Extension Block on 2/F, the proposed BH of +75.4mPD is slightly higher than the BH restriction stipulated in “OU(RDHPB)” zone by 0.4m, which is about 0.53% increase. The proposed BH of new Western Extension is +67.7mPD is higher than the BH restriction of +64mPD stipulated in “OU(RDHBP)” zone, which is about 5.8% increase. PlanD may wish to consider whether such height increase is in line with your planning intention of the subject site.</p> <p>4. A visual impact assessment is required to provide more information on the building heights of the surrounding buildings as well as some images/photomontages of the proposed development from different vantage points to demonstrate whether the proposed development would be visually compatible with the Grade 1 historic building Maryknoll House and surrounding residential development.</p>	<p>Noted.</p> <p>Noted.</p> <p>Noted, visual impact assessment will be conducted and submitted.</p>
<p><u>Comments from Chief Engineer/Hong Kong & Islands, Drainage Services Department:</u> <u>(Contact Person: Mr Ray ZHOU, Tel: 3101 2366)</u></p>	

Comments	Response
<p>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 Sewerage Infrastructure Group/Environmental Protection Department. However, the following is observed:</p> <p>(a) Table 3.1 - The assumed area and the estimated ADWF of the clubhouse deviate from Table 1 in Appendix 3.1. Please review.</p> <p>(b) Table 3.1 - The difference between "peak flow incl. pool" and "peak flow" is 8.8 L/s, which deviates from the summation of the swimming pool flow. Please review and clarify.</p> <p>(c) Appendix 3.1 Table 1 - There are 2 items (nos. 7 and 14) for the calculation of the sewage flow of "Private Pool for Unit E (Upper Deck)". Please clarify whether there are 2 separate pools on the upper deck for Unit E.</p> <p>(d) Appendix 3.1 Table 3 - Please review whether the UFF of R2 or R3 housing type is more appropriate for the low-density residential developments.</p> <p>2. Appendix 2.1 - Please provide catchment plan showing the extent of Catchment A, B, C, D, E, F and S, and the concerned drainage facilities.</p> <p>3. Table 4a to 4d in Appendix 2.1 - The effect of climate changes on rainfall intensity in mid 21st century and end 21st century should be 11.1% and 28.1% (16.0% + 12.1% design allowance) respectively.</p>	<p>Noted, the relevant section has been revised (<i>Appendix I</i> refers).</p> <p>The ADWF of clubhouse have been revised and it is confirmed that the summation of the swimming pool is 8.8L/s (<i>Appendix I</i> refers).</p> <p>Please be confirmed that there are 2 separate pools on the upper deck for Unit E.</p> <p>UFF of R3 has been adopted in the catchment A.</p> <p>Figure 2.3 has been added (<i>Appendix I</i> refers).</p> <p>Noted and the tables have been updated accordingly (<i>Appendix I</i> refers).</p>

Comments	Response
<p><u>Comments from Chief Town Planner/Urban Design and Landscape, Planning Department:</u> <u>(Contact Person: Ms Vanessa TSANG, Tel: 3565 3942)</u></p> <p>1. The Site is mainly surrounded by low-rise residential development zoned “Residential (Group C)” with a maximum building height (BH) of 3 storeys in addition to 1 storey of carport to its immediate north, east and south. To its further west across Carmel Road is Ma Hang Estate zoned “Residential (Group A)3” with a maximum BH of 12 storeys.</p> <p>2. According to Figure 5.6 in the supplementary planning statement, view to the Maryknoll House is preserved. The two proposed eastern and western extensions, and the new residential blocks at the lower platform are partially visible with lower floors being screened off by vegetation. Judging from the photomontage, the overall scale of the proposal in terms of BH and building mass are considered to have respected the heritage features and the adaptive reuse of the historic building of the Maryknoll House are generally in line with the urban design considerations for heritage as stated in Section 6.2 (6) of the Urban Design Guidelines (Chapter 11) of the Hong Kong Planning Standards and Guidelines.</p> <p>3. Given that the current proposal would lead to minor relaxation of plot ratio, BH and site coverage and the site is located at a prominent location at Stanley, the Applicant may wish to discuss the potential visual impacts with the aid of visual materials (such as photomontages) with reference to TPB PG-No. 41 to demonstrate the views from areas frequented by pedestrians, such as Blake Pier at</p>	<p>Noted.</p> <p>Noted.</p> <p>Noted, visual impact assessment will be conducted and submitted.</p>

Comments	Response
<p>Stanley, Ma Hang Park and bus stop at Stanley Plaza.</p> <p><u>Landscape Perspective</u> (Contact Person: Mr NGAI Chak Man, Tel: 3565 3955)</p> <p>Appendix B – Tree Preservation and Landscape Proposal</p> <p>Table 4.0 – As compared with the Approved Scheme, the total greenery and greenery ratio has been increased in the current application. Please review the “Difference” column which indicate a decrease in the total greenery and greenery ratio (i.e. “-103.40m2” and “-1.35%”).</p> <p>5. Appendix IV – Drawing No. GC01 – Greenery Calculation – Please indicate “for PlanD’s reference only” on this drawing which is related to site coverage of greenery calculations in accordance with BD’s PNPP APP-152.</p> <p><u>Advisory Comments to the Applicant</u></p> <p>6. The applicant is reminded that approval of the application does not imply approval of the greenery coverage requirements under BD’s PNAP APP-152 and/or under the lease. The greenery coverage calculation should be submitted separately to BD/LandsD for approval. Similarly for any proposed tree preservation/removal scheme, the applicant shall be reminded to approach relevant authority/ government department(s) direct to obtain the necessary approval.</p>	<p>The mentioned “Difference” column has been reviewed and revised accordingly. Please refer to the replacement page P.11 of the Tree Preservation and Landscape Proposal (<i>Appendix II</i> refers).</p> <p>The drawing no. GC01 has been revised accordingly (<i>Appendix II</i> refers).</p> <p>Noted.</p>
<p><u>Comments from the District Lands Officer/ Hong Kong West & South:</u></p>	

Comments	Response
<p>(Contact Person: Mr Ivan WONG, Tel: 2835 2408)</p> <p>2. RBL 333 is governing by Conditions of Sale No. 3114 (“the Lease”) and the Lease contains, inter alia, restrictions of “not more than then houses”, “houses of European Type only” and “Design, disposition and height” clause. There are no restriction on user, GFA, site coverage and building height under the Lease.</p>	<p>Noted.</p>
<p>3. RBL 333 was carved into RBL 333s.A and RBL 333RP (i.e. the Site) by an assignment of RBL 333s.A. dated 17.10.1975 (“the Assignment”). According to the Assignment, the Vendor and the Purchaser mutually agreed, inter alia, not to erect more than three houses upon RBL 333RP and not to erect more than seven houses upon RBL 333s.A without prejudice to their respective rights to apply for lease modification to permit more houses. A lease modification was subsequently executed in 1976 for RBL 333s.A to remove, inter alia, the houses restriction.</p>	<p>Noted.</p>
<p>4. Special Condition No. 9 (“SC(9)”) of the Lease stipulates that rights-of-way (“ROW”) (outside RBL 333) to be approved by the then Director of Public Works will be given to the purchaser of RBL 333 and the ROW alignment as shown coloured Brown on the plan No. MH623a was approved under SC(9) of the Lease on 14.9.1977. Besides, as stipulated under the Assignment, the Purchaser of RBL 333 s.A should provide the owners and occupiers of RBL 333 RP a full free and uninterrupted right of way within RBL 333 s.A as coloured Pink and hatched Red on the plan attached to the Assignment. However, please be advised that the Assignment was a private agreement between the owners of RBL 333 s.A of RBL 333 s.A and RBL 333 RP and the Government do not have a role in dealing with the disputes of the ROW in RBL 333 s.A.</p>	<p>Noted.</p>

Comments	Response
<p>5. As far as the Lease is concerned, development of 3 houses of European type within the Site would not be considered in breach of lease condition and therefore a modification to implement the proposal is not required.</p>	<p>Noted.</p>
<p><u>Comments from Chief Engineer/Construction, Water Supplies Department:</u> (Contact Person: Mr Terry LAW, Tel: 2152 5737)</p> <p>1) Please note that there are some existing freshwater mains within the site and are affected by the proposed development. Free access should be allowed for WSD at any time to carry out operation and maintenance of these water mains. In case the project proponent considers that diversion of these water mains is required, they should study the feasibility of diverting these water mains. If diversion is considered feasible, the project proponent should submit their proposal for WSD's consideration and approval. The water mains diversion work shall be carried out by the project proponent at their own cost to the satisfaction of WSD. WSD will only carry out the connection works to the existing network and the associated connection cost should be borne by the project proponent.</p> <p>2) Please find attached partprint of our mains record plans showing the existing water mains in the vicinity of the captioned site for your information. Please note that the alignments of the water mains are indicative only. The exact lines and levels of our water mains should be established by hand dug trial pits on site if they are of</p>	<p>Noted.</p>

Comments	Response
<p>significance to your works. Some changes might have been made to the information shown on the drawings in the course of time and that digging of trial holes to ascertain the exact alignment and depth of water mains would still be necessary before any road excavation.</p> <p>3) Please also note that the project proponent shall carry out demand assessment for WSD's consideration, and a detailed Water Supply Impact Assessment (WSIA) may be required subject to the additional demand arising from the development.</p>	<p>Water Demand Assessment has been conducted (<i>Appendix III</i> refers). The assessment results show that the freshwater demand and saltwater demand is 33.7m³/day and 5.2m³/day respectively. No significant impact on the water demand arisen from the Proposed Development would be anticipated.</p>
<p><u>Comments from Director of Environmental Protection:</u> (Contact Person: Mr Andy KO, Tel: 2835 1011)</p> <p><u>Environmental Assessment</u></p> <ol style="list-style-type: none"> 1. Written proof of TD's endorsement of traffic forecast data in Year 2043 is not provided. Please supplement. 2. Please review if there is any fixed noise impact from roof of Stanley Municipal Services Building and The Stanley Oriental Hotel to the proposed development. <u>Sewerage Impact Assessment</u> 3. In section 3.3.3, the Catchment Inflow Factor (Pcif) of Stanley should be 1.00 instead of 1.10. Please revise. 4. In Table 3.1 & Table 1 of Appendix 3.1, the assumed area of the Clubhouse is 344m² and 3,703m² respectively. Please review and advise the correct number. 	<p>The Project Traffic Consultant has submitted the traffic forecast to TD for endorsement. The endorsement will be provided once it is available.</p> <p>Noted, section 1.5.4 has been revised accordingly (<i>Appendix IV</i> refers).</p> <p>Noted, section 3.3.3 has been revised accordingly (<i>Appendix IV</i> refers).</p> <p>Please be clarified that the area of the Clubhouse should be 344m². Table 3.1 has been revised accordingly (<i>Appendix IV</i> refers).</p>

Comments	Response
<p>5. In Table 3 of Appendix 3.1, the UFF type "Catchment A Stanley Knoll, 18 Carmel Road and 20 Carmel Road" should be Domestic R3 0.34m³/day instead of 0.27 m³/day. Please revise.</p>	<p>Noted, Table 3 of Appendix 3.1 has been revised accordingly (<i>Appendix IV</i> refers).</p>
<p><u>Comments from Chief Building Surveyor/HKE&H:</u> <u>(Contact Person: Mr Alex CHAN, Tel: 2626 1154)</u></p> <p>(a) Gross Floor Area (GFA) concessions (i.e. excluding/ disregarding green/ amenity features and non-mandatory/ non-essential plant rooms and services from GFA and/or Site Coverage (SC) calculation) under PNAP APP-151 will only be considered when the pre-requisites in paragraph 6 of PNAP APP-151, including Sustainable Building Design Guidelines as stated in PNAP APP-152, have been complied with;</p> <p>(b) GFA concession for private carparking spaces and loading/unloading areas may be considered when the relevant requirements as laid down in PNAP APP-2 have been complied with. Any excessive provision of carparking spaces will be included in GFA calculation;</p> <p>(c) Emergency vehicular access should be provided to proposed buildings in compliance with regulation 41D of the Building (Planning) Regulation (B(P)R);</p> <p>(d) If the proposed Heritage Gallery is used as places of public entertainment under Cap. 172, the requirements under Section 3 of Part B Means of Escape of the CoP for Fire Safety in Buildings</p>	<p>Noted.</p> <p>Noted.</p> <p>Noted.</p> <p>Noted.</p>

Comments	Response
<p>2011 should be complied with;</p> <p><u>Other Detailed Comments (if applicable):</u></p> <p>(e) Alternative exit route should be provided to carpark. on upper deck LG/F;</p> <p>(f) The covered driveway/EVA at lower deck G/F is GFA accountable, unless exempted;</p> <p>(g) The E&M area at lower deck lower G/F is excessive and GFA accountable;</p> <p>(h) Detailed comments on the proposal can only be given at building plan submission stage.</p> <p>3. Presumably, AC for T/U, TD will advise on the provision of the carpark and loading and unloading space, if any.</p>	<p>Noted, details will be provided at GBP stage.</p> <p>Noted, details will be provided at GBP stage.</p> <p>Noted, details will be provided at GBP stage.</p> <p>Noted.</p> <p>Noted.</p>

Consolidated by: **KTA Planning Limited**

Date: **28 October 2024**

List of Appendices

- Appendix I Revised Drainage & Sewerage Impact Assessment
- Appendix II Updated Landscape Drawings
- Appendix III Water Demand Assessment
- Appendix IV Revised Environmental Assessment