

Application for Permission under Section 16 of the Town Planning Ordinance (Cap.131)  
 For Minor Relaxation of Building Height Restriction from 2 Storeys to 4 Storeys  
 For a Proposed 4-Storey Columbarium  
 At Part of Inland Lot No. 7755 RP and Adjoining Government Land  
 between Inland Lot Nos. 7755 RP and 7713 (altogether "the Site")  
 Cape Collinson Road, Chai Wan, Hong Kong  
 Response to Departmental Comments

**RESPONSE-TO-COMMENTS TABLE**

Item	Departmental Comments	Responses
LU, PlanD	<p><b><u>Landscape Unit, Planning Department</u></b></p> <ul style="list-style-type: none"> <li>- <i>Contact Person: Mr. NGAI Chak Man (Tel: 3565 3955)</i></li> <li>- <i>Via Email dated 4 June 2024</i></li> </ul>	
LU, PlanD 1	<p><b><u>Landscape Observations and Comments</u></b></p> <p>Based on the aerial photo of 2022, the Site is located in an area of Cemetery Landscape character surrounded by cemeteries and woodlands. The proposed development under this planning application is considered not incompatible with its surrounding environment.</p>	Noted.
LU, PlanD 2	<p>According to the aerial photo of 2022, most of the site is covered by existing trees and vegetation. According to the Landscape Impact Assessment and Landscape Proposal (LVIA &amp; LP), total 30 nos. of existing trees within the Site were surveyed. Among the trees surveyed within the Site, 2 nos. of <i>Artocarpus hypargyreus</i> (Tree ID No. AH1 and AH2) are listed as Near Threatened in "Rare and Precious Plants of Hong Kong" (AFCD 2003), and the remaining trees are common species and no registered Old and Valuable Trees (OVTs) were identified. All surveyed trees within the Site are proposed to be <u>felled</u> as they would be unavoidably affected by the proposed site formation works, temporary and permanent construction works and are not suitable to be transplanted. Impact on existing landscape resources within the site arising from the proposed development is anticipated.</p>	Noted.
LU, PlanD 3	<p>Two planting areas with trees and shrub planting are proposed at Level +117.05mPD (G/F) and a communal roof garden with seating area are proposed at +131.05mPD (R/F). Landscape Areas at G/F and R/F will be accessible to the</p>	Noted.

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	<p>public and visitors. 6 nos. of compensatory trees of native and exotic species are proposed to be planted within the Site at G/F. The proposed new tree planting ratio can only achieve a ratio of 1:0.20 in terms of number within the Site due to site constraints and the tree planting areas available within the site (para. 4.3.10). According to the LIA, there is currently no suitable receptor site for offsite compensatory planting in the vicinity. In addition, shrubs/groundcovers of both native and exotic species (with a high proportion of native species) are proposed at G/F and R/F.</p>	
<p>LU, PlanD 4</p>	<p>According to para. 4.3.5 of the LIA, "woodland mix planting of whips or shrubs with native species" is recommended on the surrounding affected slopes located in the northeastern portion within the Site and along the eastern edge of the Site outside the Site. The practicality of the proposed plantings at the slope(s) outside the application boundary is subject to agreement/ approval by relevant department(s).</p>	<p>Noted.</p>
<p>LU, PlanD 5</p>	<p><b><u>Detailed Comments on the LVIA &amp; LP</u></b>            Para. 3.1.4 and 4.1.1, Appendices A and B - It is noted that <u>an assessment area of 100m beyond the Site Boundary</u> is adopted for the Landscape Impact Assessment (LIA), which is <u>not</u> required for s.16 application. The applicant should make reference to para.28 of the guidance notes for application under s.16 and Annex B for further details regarding the requirement of the landscape submission to support the application for development that may have impact/implications on the landscape. Excessive and irrelevant information would not be reviewed. Our previous</p>	<p>We have restructured and simplified the report to follow the requirement under Guidance Note for Application for Permission Under Section 16 and removed unnecessary information/details. The assessment area for landscape impact has been reduced to include only the immediate neighbourhood, i.e. the woodland to the immediate east and southeast of the Application Site, and the cemetery landscape to the west of the Application Site. The report text and figures have been revised accordingly. Please refer to the revised Landscape and Visual Impact</p>

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	comment item no. 7 on the pre-submission via DPO's email to URBIS Limited dated 29.4.2024 is <u>still applicable</u> .	Assessment and Landscape Proposal at Appendix A for details.
LU, PlanD 6	Para. 4.3.4 – It is mentioned that "47 nos. of existing trees within and outside the Site (5m extent from the Site boundary) would be unavoidably affected". The number of trees affected within the Site and outside the Site should be separately provided. For any existing trees and proposed tree treatments outside the application site boundary, the relevant paragraphs/ tree information is advised to be clearly indicated "for PlanD's reference only", and comments from relevant authorities should be sought accordingly.	The number of trees affected within the Site and outside the Site have been separately provided. For any existing trees and proposed tree treatments outside the application site boundary, the relevant paragraphs/ tree information have been indicated "for PlanD's reference only". Comments from relevant authorities will be sought in the later stage.
LU, PlanD 7	Table 4.3.3 – The remark "for PlanD's reference only" in the heading should be moved to the row for proposed tree treatment <u>outside the Site</u> . The total number of trees within the site and outside the Site should be separately provided.	The remark "for PlanD's reference only" in the heading has been moved to the row for proposed tree treatment outside the Site. The total number of trees within the site and outside the Site have been separately provided. Please refer to Tables 4.3.3 and 4.3.4.
LU, PlanD 8	Para. 4.3.5 – Proposed species for "woodland mix planting of whips or shrubs" should be provided.	The proposed species for woodland mix planting of whips or shrubs includes <i>Machilus chekiangensis</i> , <i>Sterculia lanceolata</i> , <i>Mallotus paniculatus</i> and <i>Ficus microcarpa</i> . These species are native and moderately to highly adaptable to the site condition. Final species selection will be subject to detail design development and market availability. Para. 4.3.5 is revised.
LU, PlanD 9	Para. 4.3.9 – Noting the proposed compensatory tree planting ratio can only achieve 1:0.20 in terms of tree number within the Site, the applicant should maximise opportunity for new tree planting within the Site and/or improve overall value of landscape setting, increase overall site coverage with diverse vegetation mix, maximise soft	The opportunity for new tree planting within the Site has been maximised considering the site constraints and the available tree planting areas within the Site (para. 4.3.10). Planting area on G/F has already been maximised in view of the constraints that entrances and narrow areas are not suitable for planting. It is

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	<p>landscape opportunities (e.g. edge planters).</p>	<p>therefore proposed to extend planting area on R/F instead.</p> <p>Edge planting has been added on R/F to maximise soft landscape opportunities. The previously proposed planting areas have been extended, a planting strip has been added on the roof along eastern edge and a small planter has been added in the northeastern corner. The updated landscape plan on R/F and landscape section are shown in Drawing Nos. HKBA1-LP03 and HKBA1-SE01.</p> <p>In order to increase overall site coverage with diverse vegetation mix, a variety of native seasonal flowering and evergreen shrubs and groundcover have been proposed to diversify the vegetation mix. A total of 20 shrubs and groundcover species are proposed with 3 major heights. It aims at creating layering effects and three-dimensional visual experience for users, envisioning to improve overall value of landscape setting. The majority of these proposed species are native which can enhance biodiversity and local ecosystem and connect to the adjacent hillside landscape. Please refer to updated Table 6.3.3 Proposed Planting Schedule.</p>
<p>LU, PlanD 10</p>	<p>Para. 4.3.12 and Table 4.3.4 – It is mentioned that 1 <u>no. of heavy standard tree</u> is proposed on ground floor. According to Table 4.3.4, the proposed size for <i>Sterculia lanceolata</i> (min. DBH 70mm) is not heavy standard. Please review and rectify.</p>	<p>To address EcolA Para. 8.1.3, <i>Artocarpus hypargyreus</i>, tree species with conservation importance to be felled that shall consequently be compensated, the previously proposed compensatory species <i>Sterculia lanceolata</i> will be replaced by <i>Artocarpus hypargyreus</i>. Its min. DBH has been revised to 75mm to match heavy standard size in Para. 4.3.12 and Table 4.3.5.</p>
<p>LU, PlanD 11</p>	<p>Appendix C –Tree Treatment Schedule – The number of trees affected within the</p>	<p>Tree Treatment Schedule has been separated for the number of trees</p>

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	Site (TG1) and outside the Site (TG2) should be <u>separately provided</u> in the Tree Treatment Schedule, including also the Grand Total and Summary Table. For any existing trees and proposed tree treatments outside the application site boundary, the relevant paragraphs/ tree information is advised to be clearly indicated "for PlanD's reference only", and comments from relevant authorities should be sought accordingly.	affected within the Site (TG1) and outside the Site (TG2). For any existing trees and proposed tree treatments outside the application site boundary, "for PlanD's reference only" has been indicated in the Tree Treatment Schedule. Comments from relevant authorities will be sought in the later stage.
LU, PlanD 12	Appendix C – Tree Treatment Schedule – It should be clarified whether TG2 is located within private lot or government land.	TG2 is located within the private lot - Inland Lot No. 7713. The information has been provided in the remarks in the Tree Treatment Schedule for TG2.
LU, PlanD 13	Appendix D – Landscape Plan and Mitigation Measures – Overall (Dwg. No. HKBA1-LP01) – The extent of OM5 along the slopes at eastern edge of the site should be indicated for reference.	The extent of OM5 cannot be identified at this stage as the actual extent of works area is to be confirmed. The extent of OM5 will be subject to the works area identified in the detailed design stage of the Development. Impact to trees on slopes will be avoided as far as possible.
LU, PlanD 14	<b><u>Advisory Comments to the Applicant</u></b> The applicant is reminded to seek comments/agreement from the relevant departments(s) on the proposed soft/hard landscape works outside the application boundary.	Noted.
LU, PlanD 15	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, if any. The applicant is reminded to seek approval for any proposed tree works from relevant departments prior to commencement of works.	Noted.
<b>DSD</b>	<b><u>Drainage Services Department</u></b> - <i>Contact Person: Mr. Lawrence Wong (Tel: 3101 2362)</i> - <i>Via Email dated 12 June 2024</i>	
DSD 1	<u>The plan for the proposed diversion of stream</u> 1. The propose development would constrain future improvement on	The capacity of concerned box culvert, taking into account the latest design

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	<p>the box culvert. The project proponent should review the capacity of concerned box culvert, taking into account the latest design rainfall profile and the effect of climate change.</p>	<p>rainfall profile and the effect of climate change will be reviewed in the Drainage Impact Assessment in the detailed design stage of the development.</p>
DSD 2	<p>2. The construction plan at B/F: The proposed culvert will be connected to the existing underground box culvert at Cape Collinson Road and this connection should be carefully designed. Additionally, adequately sized access openings should be installed on the box culvert outside the lot boundary to facilitate future maintenance of the box culvert beneath Cape Collinson Road. The details of these openings should be agreed upon with the relevant government departments, such as the HyD and DSD.</p>	<p>This will be provided in details in the Drainage Impact Assessment in the detailed design stage of the development.</p>
DSD 3	<p>3. During the heavy rainstorm in September 2024, a significant amount of rainwater flowed from the natural terrain in the southeastern part of the proposed building, resulting in a landslide at the WSD slope located on the northern side of the proposed building next to Cape Collinson Road. Therefore, the project proponent should design the intercepting drains, especially on the eastern side, to effectively capture and discharge the rainwater into the storm drainage system. A detailed design, accompanied by hydraulic calculations, should be submitted to the DSD for agreement.</p>	<p>This will be included in the Drainage Impact Assessment in the detailed design stage of the development.</p>
ArchSD	<p><b><u>Architectural Services Department</u></b>  - <i>Contact Person: Mr. Sherman Sum (Tel: 2582 5314)</i>  - <i>Via Email dated 17 June 2024</i></p>	

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ArchSD 1	Based on the information provided, it is noted that the maximum building height (BH) of development is proposed to be relaxed from 2 storeys to 4 storeys. According to the Landscape and Visual Impact Assessment, the overall visual impact of the proposal from different vantage points of VP1 to VP6 on the surrounding context would range from slight to moderate. It appears that the proposed development may not be incompatible with the surrounding environment. We have no particular comment from the architectural and visual impact point of view, subject to PlanD's view. However, the applicant may wish to consider the treatment/articulation of the building form and elevation design in the design stage to blend in more harmoniously with the surrounding environment,	Noted. The form and elevation design of the proposed development shall be carefully considered to blend in harmoniously with the adjacent building and its surrounding environment in the design stage.
<b>UDU, PlanD</b>	<b><u>Urban Design Unit, Planning Department</u></b> - <i>Contact Person: Ms. Vanessa TSANG (Tel: 3565 3942)</i> - <i>Via Email dated 17 June 2024</i>	
UDU, PlanD 1	According to the submitted LVIA, the proposed development would cause slightly adverse to moderately adverse visual impacts to the selected public viewing points (VPs). Mitigation measures including onsite compensatory tree planting, sensitive design with natural materials to minimize potential adverse visual impacts, buffer planting, roof planting to promote visual integration with the surroundings, etc. are proposed. The overall visual impact of the proposed development is considered to be slightly adverse as it will result in some negative visual effects to most of the identified key VPs.	Noted.
UDU, PlanD 2	<u>Textual Comments</u> (a) Table 5.3.1 – An asterisk is marked behind "Overall Visual Impact (None,	A note 'All visual impacts are adverse unless stated otherwise.' has been added for the asterisk, see the note under Table

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	Insubstantial, Slight, Moderate, Substantial)” without any remarks/note. Please rectify.	5.3.1. Please refer to the revised Landscape and Visual Impact Assessment and Landscape Proposal at Appendix A for details.
UDU, PlanD 3	(b) Para. 5.3.23 and Table 5.3.1 – It is noted that the magnitude of change for VP3, VP5 and VP6 are all assessed as Small and the sensitivity of their VSR Group are Medium. To maintain consistency, please consider to amend the overall visual impact of VP5 as Slight as in VP3 and VP6.	The overall visual impact of VP5 has been revised to Slight, see Para. 5.3.23 and Table 5.3.1.
<b>GEO, CEDD</b>	<b><u>Geotechnical Engineering Office, Civil Engineering and Development Department</u></b> - <i>Contact Person: Ms. Candy CHO (Tel: 2762 5383)</i> - <i>Via Email dated 17 June 2024</i>	
GEO, CEDD 1	<u>Natural Terrain Hazard Study (NTHS) Report in Appendix E</u> According to the GEO Advice Note for Planning Applications under Town Planning Ordinance (Cap 131) (enclosed), a detailed NTHS Report is not an essential document for this planning application at this stage. The NTHS Report in Appendix E demonstrated that the natural terrain hazard for this site is surmountable. It is presumed that the applicant will submit a NTHS Report to BD for approval in the next stage of the project and our detailed comment on the NTHS will be further provided upon receive the NTHS Report referred from BD.	Noted. A NTHS Report will be submitted to BD for approval in detailed design stage.
GEO, CEDD 2	Nonetheless, we have the following preliminary observations for the NTHS report: a) Section 8.1 of the NTHS Report concluded that the provision of a rigid debris-resisting barrier at the toe of the natural terrain study area for natural terrain hazard mitigation is required. It is noted from Figure 12 that the proposed rigid debris-resisting barrier would fall into the adjoining private lot (i.e. Inland Lot	Noted. The proposed rigid debris-resisting barrier shall be within the application lot (i.e. within the Site Area). Land status adjoining the application lot is also added in the revised Figure 12 for clarity. Please refer to the replacement page of the Natural Terrain Hazard Study Report at Appendix B for details.



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	<p>No. 7713). Land status adjoining the application lot should be shown in relevant figure(s) for clarity. The applicant shall consult relevant authorities/parties for the proposed works outside the application lot in particular seeking prior approval/ agreement from the owners of Inland Lot No. 7713 for allowing the applicant to gain access for the purpose of carrying out, completion, inspection and maintaining all necessary mitigation works within Inland Lot No. 7713.</p>	
GEO, CEDD 3	<p>b) We would also like to draw the applicant's attention that where access to the adjoining private lot is not available to the applicant for the purpose of carrying out investigation and stabilization measures, the proposed mitigation measures including any debris retaining structures which the designed debris retention capacity of such retaining structures shall not rely on any area in the adjoining private lot.</p>	<p>Noted. The proposed rigid debris-resisting barrier shall be constructed within the application lot. In the next stage of the project (i.e. site formation design stage), further consultation/approval shall be obtained from the owners of Inland Lot No. 7713 whether access can be gained to facilitate the construction, inspection and maintaining all necessary mitigation works. Detailed design of the proposed mitigation works will take into account of this land issue.</p>
<b>EPD</b>	<p><b><u>Environmental Protection Department</u></b>  - <i>Contact Person: Ms. Kathy HO (Tel: 2835 1847)</i>  - <i>Via Email dated 19 June 2024</i></p>	
EPD 1	<p>Please see our comments on the SIA below from sewerage planning perspective. We will offer comments from water quality perspective (if any) in due course.</p>	<p>Noted.</p>
EPD 2	<p>1) Section 4.2, 4.4, 7.3 &amp; Appendix 7.1: The UFF type for staff should be "J11 Community, Social &amp; Personal Services", which UFF of 0.28 should be deployed.  Please revise and update the estimation of flow. Hence, please also review section 4.3.</p>	<p>UFF of 0.28 has been adopted. Relevant sections have been revised / removed accordingly. Please refer to the replacement pages of the Sewerage Impact Assessment Report at Appendix C for details.</p>

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EPD 3	Apart from the above, please confirm whether there will be installation of joss paper burners/furnace at the subject site and any burning activities would be carried out.	There will be no burning activities and no joss paper burner/furnace to be installed in the proposed columbarium.
<b>DLO, LandsD</b>	<b><u>District Lands Office/Hong Kong East, Lands Department</u></b> - <i>Contact Person: Mr. Benny Yu (Tel: 2835 1664)</i> - <i>Via Email dated 25 June 2024</i>	
DLO, LandsD 1	<u>Site Boundary</u> In addition to the UUGL and Slope Feature No. 11SE-D/C69 (1) mentioned in para. 4.2 of the PS, a piece of UUGL at the northern tip of the application site zoned "Road" on the OZP as marked pink hatched blue on the plan at the Annex has been included in the Proposed Lot Extension as Pink Hatched Blue Area (PHBA). As previously advised by TD, there is no road improvement plan for the PHBA. However, from land administration perspective, it has been considered not inappropriate to include the PHBA in the Proposed Lot Extension, which shall be maintained by the applicant and re-delivered to the Government on demand. No building or structure shall be erected or constructed or placed on, over, under, above, below or within the PHBA. All relevant B/Ds (incl. the then FHB, FEHD, TD, HyD, DSD (as the PHBA would also cover an existing culvert) and the applicant have agreed and accepted the said arrangement. Hence, the applicant should include such arrangement in the subject application scheme.	Noted. It is understood that the requirements are similar to that contained in the basic terms in the previous lot extension which were agreed and accepted by the applicant.
DLO, LandsD 2	<u>Formation of Green Area</u> While I shall defer to TD and HyD to consider and comment the TIA, please be advised that under the Proposed Lot Extension, the applicant shall form and make good a piece of UUGL sandwiched between the application site and Cape	Noted. Similar to the above, it is understood that the requirements on Green Area are similar to that contained in the basic terms in the previous lot extension which were agreed and accepted by the applicant.

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	Collinson Road as shown coloured green on the plan at the Annex as Green Area. The applicant should include such road improvement works in the subject application scheme for consideration and comment by all relevant B/Ds.	
DLO, LandsD 3	<u>Vehicular Access</u> Under the Proposed Lot Extension, no vehicular access would be allowed for the application site based on TD's advice. Presumably, the applicant should make its own arrangement for the required access to the application site through IL 7755 RP.	Noted.