

Appendix A

Responses-to-comments table

Section 16 Planning Application for Section 16 Planning Application for Proposed Hotel with Minor Relaxation of Plot Ratio and Building Height Restrictions at 201 and 203 Wai Yip Street, Kwun Tong, Kowloon (Application No. A/K14/832)

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	Departmental Comments	Responses to Comments
1.	Comments from the Kowloon District Planning Office, Planning Department received on 31.10.2024 and 8.11.2024	
1.1	As the application is for proposed hotel use with a GFA of about 26,957m ² , please clarify if it includes guest rooms, hotel floor circulation, hotel ancillary facilities, non-essential plant rooms, Back of House (BOH) facilities, and etc. In particular, please clarify if BOH facilities, which might be eligible for GFA exemption, are taking into account when conducting technical assessments, i.e. could be absorbed in the building bulk.	<p>The proposed GFA of about 26,957m² has already included the floor area of guest rooms, hotel floor circulation and GFA accountable hotel ancillary facilities. As per the stipulation under relevant PNAP, BOH facilities are exempted from GFA calculations such as some essential plant rooms and BOH areas for staff, pipe duct and etc.</p> <p>Nonetheless, the above BOH facilities has already been taking into account when formulating the layout of the Proposed Development in that the to-be-exempted GFA could be absorbed in the building bulk with building height of not more than 120mPD. Please also be clarified that the to-be-exempted GFA have already been taken into account in the supporting technical assessments.</p>
1.2	The applicant has proposed canopy along the Wai Yip Street frontage of the proposed developments under the previously approved planning applications No. A/K14/778 and 808 to justify for the minor relaxation of plot ratio and/or building height restriction. Please clarify if the provision of canopy will be considered under the current submission. If affirmative, please clarify If PR/GFA arising from the proposed canopy could not be exempted at general building plan (GBP) submission stage, the applicant will absorb those PR/GFA in the Proposed Scheme.	Taking into account the design merits committed in previous planning approvals, a weather-protection canopy on the building façade fronting Wai Yip Street on top of the setback is now included in the current proposed scheme. According to the current design, the proposed canopy would have a dimension of about L 39.6m x W 1.5m. The extent will be subject to further review at subsequent detailed design stage with reference to requirements of relevant PNAP. Please refer to Attachment 1 for the updated pages of Planning Statement and drawings for consideration.
1.3	As the application is for proposed minor relaxation of building height restriction, please make reference to Para. 7.4 of the Explanatory Statement of the approved Kwun Tong (South) Outline Zoning Plan S/K14S/26, and justify if the current application fulfill the relevant criteria for a favorable consideration.	Noted. The criteria for consideration of minor relaxation of BH restrictions stipulated in the Explanatory Statement of the OZP has been considered. Please refer to Section 4.7 of the replacement pages of Planning Statement in Attachment 1 for consideration.

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1.4	Please provide a breakdown of hotel room in terms of room type, average room size, and approximate no. of guest per room.	According to the indicative layout of the Proposed Development, a total of 448 hotel rooms will be provided in the Proposed Development with room sizes ranging from 20m ² to 62m ² . Among these, about 19% will be studio-type rooms, 77% will be one-bedroom suite-type rooms, and 4% will be two to three-bedroom suite-type rooms. The Proposed Development is designed to cater to single business travellers and small-size family tourists, accommodating 1 to 4 guests per hotel room. It should be highlighted that the breakdown is only for indicative purpose and it will be subject design review at subsequent stages.
1.5	In addition to paragraph 4 above, please clarify the total number of guests in the proposed development. Similarly, it is noted from the submitted sewerage impact assessment, the assumed contributing population is about 5,515 people. Please elaborate if such assumption has taken into account the staff being employed (i.e. 813+71+4).	According to the indicative layout, the Proposed Development is expected to accommodate approximately 932 guests. Please also note that the number of guests and staff have been considered in the calculation in the SIA in accordance with Table T-2 of the Guidelines for Estimating Sewage Flows for Sewage Infrastructure Planning (Version 1.0) published by EPD.
1.6	As the Wai Yip Street Electricity Substation is located adjoining the Site, please clarify if the hotel proposal has taken into any consideration and adaptation of any building design in avoidance of potential interface issue.	Please note that the guest rooms of the Proposed Development will be located starting from 3/F (22.45mPD) of the hotel building whilst the building height of the Wai Yip Street Electricity Substation is approximately 9mPD. In view of this height differential, it is anticipated that there will be no adverse interface issues between the Proposed Hotel and the Electricity Substation.
	<p><u>Specific Comments</u></p> <p>1.8 Para.4.4.6- As the current application agglomerates two previously approved planning application, as observed from the location plan, it is hardly justified that the site is still 'elongated' in shape. Please revisit this paragraph in justifying the current layout is the optional design. Please also specified the percentage of the setback area over the total site area.</p>	Noted. The Planning Statement has been revised accordingly. It should be highlighted that the provision of setback from Wai Yip Street for footpath widening and the setback and aboveground NBA from back alley for loading/unloading activities as per the previous approved planning applications remains unchanged in the current Proposed Development, accounting for about 11.6% of the Site Area. Under such site development context, the Applicants have tried their best effort to accommodate the Proposed Development on-site as well as to satisfy the design requirements, thus the current layout is considered to be an optimal option.

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1.9	<p>Para.4.4.8- <i>'of and overall Proposed Development, the Applicants have proposed an overall "more-than-standard" greenery ratio of up to about 29% to enhance the environmental quality of the area and to mitigate heat island effect, with about 68% located in the primary zone'</i>. Please consider revising the total greenery ratio of 'up to' to 'not less than'. Besides, please provide the percentage of greenery in the primary zone, as 68% as stated which is bigger than the overall greenery provision seems unrealistic.</p>	<p>Noted. The Planning Statement has been revised accordingly. Please be clarified that '68%' refers to the percentage of greenery provided in the primary zone over the total greenery provided in the Proposed Development.</p>
1.10	<p>Further to paragraph 9 above, please clarify the landscaping proposals, inter alia, their locations and areas, as such information is currently scattered throughout the supplementary planning statement.</p>	<p>With the aim to provide a quality environment for the future tenants and users of the Proposed Development, several landscaping measures has been incorporated into the Proposed Development, providing about 544m² of greenery with an overall greenery coverage of about 29% of the site area, which include the following:</p> <ul style="list-style-type: none"> • A landscape garden with planter area of about 274m² is provided at 2/F. Planters will be provided along the periphery of the garden with uncovered podium greenery and peripheral planting to improve micro-climate in the local area and promote visual reliefs at building façade. • Multi-level vertical greening is provided between 1/F and 2/F of the building façade facing Wai Yip Street with an area of about 94m² to improve the overall urban design and visual interest along Wai Yip Street. • Green roof will also be provided at R/F of the Proposed Development with planter area of about 176m² to improve micro-climate of the Proposed Development and the surrounding areas.
1.11	<p>Para.4.4.13- Please clarify which level of BEAM plus standard the applicant is aiming for.</p>	<p>The Proposed Development intends to achieve BEAM Plus Platinum Rating. The detailed design of the building will be further coordinated and formulated in subsequent stages.</p>
1.12	<p>Please clarify the use of the 'lounge' at 1/F of the proposed development.</p>	<p>The lounge at 1/F is intended for the use of the visitors of the subject hotel development only.</p>

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1.13	<p>As observed from Figure 3.14 (section plan), the net BH of the proposed development is about 122m [120mPD- (-2mPD)] with roof top ancillary structure of at 132.4mPD. According to JPN No. 5 on control of BH restriction, the height of structures on roof-top of buildings, regardless of whether they are enclosed, covered or open, should not exceed 10% of the building height or 15 metres (whichever is the less) or else it would be accountable for the BH of the building. According to your section drawing, the height of the rooftop ancillary structure is about 12.4m [132.4mPD-120mPD] ,which exceeds the 12.2 (10% of the net BH) and therefore the BH of the proposed development is at 132.4mPD and exceeded the BHR as proposed. Please carefully considered.</p>	<p>According to JPN No.5 on building height restrictions, the height of a building should be, unless otherwise specified in the statutory town plans and/or Government Leases, measures from the <u>mean site formation level</u>. For the Proposed Development, the site formation level is set at -4mPD, with a 2m depth reserved for E&M/structures zone below the basement level. With reference to the above interpretation, the building height of the Proposed Development is considered to be main roof level – mean site formation level [120mPD – (-4mPD)], which is equivalent to 124m. As such, the height of rooftop ancillary structure (12.4m) complies with the permissible limit of 10% of the building height (12.4m). Please refer to the revised Section Plan (i.e. Figure 3.14 of the Planning Statement) in Attachment 1 for consideration.</p>
1.14	<p>Besides, you are also reminded that the total areas of all the enclosed (and covered) structures on roof-top of buildings, regardless of their height, should not exceed 50% of the roof area of the floor below, otherwise it would be counted toward the BH. Please clarify if such criteria could be fulfilled as such information is not available on the indicative roof plan.</p>	<p>Noted. The total areas of all enclosed (and covered) structures on roof-top of buildings does not exceed 50% of the roof area of the floor below.</p>
2.	Comments from the Landscape Unit, Urban Design and Landscape Section, Planning Department received on 7.11.2024	
2.1	<p>Please provide a typical detail of the proposed vertical greening at 1/F and 2/F.</p>	<p>Please find the preliminary design materials of the vertical green system at 1/F and 2/F in Attachment 2 for reference. Detailed information on the proposed vertical green system including typical panel & modular design, irrigation & drainage system, and schedule of maintenance & inspection will be further coordinated and confirmed at development implementation and construction stages.</p>
2.2	<p>Please provide information on the proposed planting (i.e. tree/shrubs/groundcover) at the peripheral planting at 2/F and ensure that sufficient soil depth can be provided for the plantings.</p>	<p>Please find the revised Figure 3.4 for the indicative dimension of the planter at 2/F in Attachment 1 for consideration. Sufficient soil depth would be provided for the planting at the landscaped garden. Please note that the above dimension is only for indicative purpose and subject to detailed design at implementation stage.</p>

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2.3	Please clarify whether the green roof is accessible for enjoyment of the users.	The proposed green roof at roof floor is designed for the enjoyment of the future tenants and users of the Proposed Development.
2.4	Please consider provisions such as seating/bench and/or other recreational facilities for enjoyment of users at 2/F landscape garden and R/F green roof.	Noted. Sitting out area with benches and/or other recreation facilities at the landscaped garden for enjoyment of users of the landscaped garden will be incorporated. Please find the revised Figure 3.4 of replacement pages of Planning Statement in Attachment 1 or consideration.
3.	Comments from the Environmental Protection Department received on 7.11.2024	
	<u>Supporting Planning Statement</u>	
3.1	The applicant has to confirm whether the proposed development will be equipped with central air-conditioning system and not rely on opened window for ventilation. The applicant should demonstrate with drawing that the fresh air intake point of the air conditioning system will be suitably located to meet the buffer distance requirements for vehicular and chimney emissions as stipulated in the HKPSG.	It is confirmed that central air-conditioning system will be equipped in the Proposed Development and opened window will not be relied on for ventilation. The fresh air intake point of the air conditioning system will meet the 10m buffer distance away from Wai Yip Street (i.e. District Distributor) and 5m buffer distance away from Tsun Yip Street (i.e. Local Distributor). Please find the replacement pages of Planning Statement in Attachment 1 for consideration.
3.2	The application site was previously occupied by industrial buildings. The applicant should provide the site history including the industrial activities carried out at the Lots, confirm whether there were any potentially contaminated activities that have occurred such as storage and handling of chemicals/dangerous goods, any spillages/pollution incidents.	Noted. It is suggested that the issues of land contamination could be addressed as an approval condition of planning approval at subsequent stage.
	<u>Appendix B Sewerage Impact Assessment</u>	
3.3	Table 2.1 Section 2 - Please check the calculation on the total number of employees in restaurant & café.	Noted. The total number of employees has been revised. Please find Table 2.1 of the revised Drainage and Sewerage Impact Assessment (DSIA) in Attachment 3 for consideration.

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3.4	Table 2.1 Section 3 - Please check the calculation on the volume of the swimming pool.	Noted. The volume of the swimming pool has been revised. Please find Table 2.1 of the revised DSIA in Attachment 3 for consideration.
3.5	Table 2.1 Section 3 & Appendix 2.1 Table 1 Section 3 - Please review if 3-minute backwash duration is sufficient.	Noted. The backwash duration has been revised. Please find Table 2.1 of the revised DSIA in Attachment 3 for consideration.
3.6	Figure 2.2a to 2.2d - Please include Catchment D1 and Catchment G in the Legends.	Noted. Please find Figure 2.2a to 2.2d of the revised DSIA in Attachment 3 for consideration.
3.7	Appendix 2.1 Table 1 to 11 - Please adopt litre/sec as the unit for peak flow, for the avoidance of doubt.	Noted. Please find Appendix 2.1 of the revised DSIA in Attachment 3 for consideration.
3.8	Appendix 2.1 Table 2 to 4, 6 to 8 & 10 - Please show the calculation steps on estimation the sewage flow from other catchments under Planning Application No. A/K14/808, for ease of reference.	Noted. Please find Appendix 2.1 of the revised DSIA in Attachment 3 for consideration.
3.9	Appendix 2.1 Table 4 (Catchment C), 12 & 13 & Figure 2.2a to 2.2d - Please review if “Grand Central” should be included in Catchment C; and indicate the location of “Kwun Tong Inland Lots 1 S.A, 1 RP, 3 and 15” on the figures.	Noted. Calculation of Catchment C has been updated. Please find Appendix 2.1 of the revised DSIA in Attachment 3 for consideration.
3.10	Appendix 2.1 Table 5 (Catchment D1) - Please show the calculation steps on estimation the full pipe capacity discharged to FMH4042956.	Noted. Catchment areas has been re-drawn and Catchment D1 no longer exists. Please find Appendix 2.1 of the revised DSIA in Attachment 3 for consideration.
3.11	Appendix 2.1 Table 6 (Catchment D2), 12 & 13 & Figure 2.2a to 2.2d - Please review and revise the sewage discharge manholes from the corresponding sub-catchments in Catchment D2.	Noted. Catchment areas has been re-drawn and Catchment D1 no longer exists. Please find Appendix 2.1 of the revised DSIA in Attachment 3 for consideration.
3.12	Appendix 2.1 Table 7 (Catchment E), 12 & 13 & Figure 2.2a to 2.2d - Please review and revise the sewage discharge manholes from the corresponding sub-catchments in Catchment E.	Catchment areas has been re-drawn and previous Catchment E is included in current Catchment C. Please find Appendix 2.1 of the revised DSIA in Attachment 3 for consideration.

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3.13	Appendix 2.1 Table 7 (Catchment E), 12 & 13 & Figure 2.2a to 2.2d - Please review if “Century Centre”, “One Sky Parc” and the sewage flow discharged to manhole “FMH4042942” should be included in Catchment E.	Catchment areas has been re-drawn and Century Centre and One Sky Parc are included in current Catchment C. Please find Appendix 2.1 of the revised DSIA in Attachment 3 for consideration.
3.14	Appendix 2.1 Table 12 & 13 - Please include the pipe roughness values for concrete pipes and review the calculations with the appropriate flow velocity.	For existing pipes, ks values for concrete pipe are adopted while for proposed pipies, ks values for uPVC are adopted.
3.15	Appendix 2.1 Table 12 & 13 - It is noted that some of the invert levels are based on assumption, please verify the assumed invert levels during site surveys at the later stage.	“Site survey shall be conducted in the detail design stage.” is added in the remark 5 of Appendix 2.1 Table 8 & 9 (previous Table 12 & 13 of the revised DSIA in Attachment 3 for consideration.
3.16	Please re-visit the assessment based on above comments.	Noted. Please find the revised DSIA in Attachment 3 for consideration.
3.17	Please note that the implementation of sewerage works shall also meet the satisfaction of DSD.	Noted.
4.	Comments from the Energizing Kowloon East Office, Development Bureau received on 11.11.2024	
4.1	For enhancing pedestrian environment, the applicant should be advised to explore the possibility to provide full-length canopy for shade and shelter along Wai Yip Street as an integral part of the building.	Taking into account the design merits committed in previous planning approvals, a weather-protection canopy on the building façade fronting Wai Yip Street on top of the setback is now included in the current proposed scheme. Please find the replacement pages of Planning Statement in Attachment 1 for consideration.
4.2	As regards the potential project interface issue between the proposed redevelopment and the planned elevated walkway along Wai Yip Street, the application is advised to liaise with CEDD on the possible connection with the planned elevated walkway.	The planned elevated walkway along Wai Yip Street are still under study and detailed location and alignment of the planned elevated walkway are not available yet. Should there be any further detailed information available in the public domain to be provided by the Government, the applicants will explore the possibility to provide connection to the planned elevated walkway at detailed design stage subject to technical feasibility and E&M coordination.

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5.	Comments from the Drainage Services Department received on 11.11.2024	
5.1	<p><u>General Comments</u></p> <p>It was proposed in the SIA for considerable upgrading works for downstream public trunk sewers by the proposed development (appr. 190m long, e.g. along Tsun Yip Street up to size dia.1500). Feasibility for such proposed sewer upgrading works should be elaborated in your report. For example, please present the preliminary proposal with tentative sewer diversion scheme if any, and associated temporary traffic arrangement in your submissions.</p>	<p>Site surveys for the feasibility of the proposed sewer work and temporary traffic arrangement for the sewer diversion works will be provided to relevant government departments before commencement of any works.</p>
5.2	<p>Drainage Impact Assessment (DIA) should be conducted by the development in due course. The Responsible Party should make reference to the DSD Advice Note No.1 Application of the Drainage Impact Assessment Process to Private Section Projects and provide associated submission to to the satisfaction of DSD. The Responsible Party should observe <DSD's Practice Note 2/2023 - Guidelines on Flood Resilience> in planning and detailed design. In particular, as it's development located at coastal areas, the Responsible Party should pay attention to the potential increase of sea level and plan a higher design formation level as far as practical. Sufficient structural prevention should be planned to ensure the flood resilience of the development. Sufficient operation arrangement to ensure emergency preparedness should be proposed to ensure the flood resilience of the development if other structural measures were considered impractical.</p>	<p>As there is no change in paved area and existing drains, no adverse impact on the existing drainage system is anticipated. Please find Section 3 of the revised DSIA in Attachment 3 on the discussion on drainage impact for consideration.</p>

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5.3	<p>The Responsible Party of the proposed development is responsible to verify that the existing government drains/sewer, to which connections are proposed, are in normal working conditions and capable for taking the discharge from the site. Condition survey of downstream public drains and sewers should be conducted prior to works commencement. Pipe cleansing and rehabilitation works (if found necessary upon survey result) should be implemented by the project to secure satisfactory hydraulic performance arising from the development.</p> <p><u>Specific Comments on SIA</u></p>	<p>For drainage aspect, no changes to the drainage system is anticipated and thus it is not considered necessary to incorporate planning approval condition on the subject planning application.</p> <p>For sewerage aspect, site surveys will be conducted during detailed design stage or before the commencement of works.</p>
5.4	<p>Please note that EPD is the planning authority of sewerage infrastructure submission of sewerage impact assessment (SIA) or any sewerage review shall be circulated to SIG/EPD for their comments and approval. Subject to EPD, it may be required to assess and demonstrate the potential sewerage impact to the existing sewerage system, and formulate appropriate mitigation measures if any adverse sewerage impact is identified.</p>	<p>Noted.</p>
5.5	<p>Section 2.4.1 Table 2.1 (2) - Please advise on how the total number of employees is calculated.</p>	<p>Noted. The total number of employees has been revised. Please find Table 2.1 of the revised DSIA in Attachment 3 for consideration.</p>
5.6	<p>Section 2.4.1 Table 2.1 (3) - Please check and revise the calculation of volume of water.</p>	<p>Noted. The volume of the swimming pool has been revised. Please find Table 2.1 of the revised DSIA in Attachment 3 for consideration.</p>
5.7	<p>Section 2.4.1 Table 2.1 - Please check and revise the calculation of peak flow accordingly.</p>	<p>Noted. The calculation of peak flow has been checked accordingly.</p>
5.8	<p>Appendix 2.1 Table 13 - Please advise whether the unit of estimated cumulative peak flow should be "L/s".</p>	<p>Noted. The unit of estimated cumulative peak flow has been revised. Please find Appendix 2.1 of the revised DSIA in Attachment 3 for consideration.</p>

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5.9	Please update your figures with existing drainage records overlaid for clarity. Proposed land lot of the development and area proposed to be set back / surrendered to the government in future should also be indicated.	Noted. Please find the Figure 2.1 and 2.2 of the revised DSIA in Attachment 3 for consideration.
5.10	For your proposed upgrading of trunk sewers, please be reminded that proposed manholes should be located such that the disruption to the traffic will be minimal when their covers are lifted under normal maintenance operations and the openings of the manholes should be confined within one traffic lane as far as possible.	Noted. Temporary traffic arrangement for the sewer diversion works will be provided to relevant government departments before commencement of any works.
5.11	For your proposed upgrading of trunk sewers, please be reminded that an inspection chamber or manhole should be provided at location of the box culvert where the proposed stormwater pipe will be connected to for ease of future pipe inspection and maintenance works.	Noted.

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5.12	<p>Please be reminded to ensure that your proposed scheme would comply with the requirements stipulated in Sewerage Manual, DSD Standard Drawings, DSD Technical Circulars, Practice Notes and Guidelines, etc. In particular, please confirm in your response for the following key criteria:-</p> <ul style="list-style-type: none"> i. Inlet invert level(s) should be higher than outlet invert level(s). ii. The invert level(s) of the connection pipe(s) at the terminal manhole(s) should be higher than the invert level(s) of the connection pipe(s) at the downstream public manhole(s). iii. The cover level(s) of terminal manhole(s) should be higher than that of the downstream public manhole(s). iv. The D.T.L should be indicated on the drawing complying with the current Government standard and a 150mm difference between I.L and D.T.L should be maintained. v. The terminal manholes should be of Type T1_1, T2_1, T3_1, T4_1 or T10_1 as appropriate and in accordance with current DSD standard drawings. vi. The proposed connection pipes should have 300mm clearance as far as possible from any existing drains or other proposed connection pipes. 	<p>Noted. All the proposed pipes would comply with the requirements stipulated in Sewerage Manual, DSD standards Drawings, DSD Technical Circulars, Practice Notes and Guidelines, etc.</p> <p>Noted.</p> <p>Noted.</p> <p>Noted.</p> <p>Noted.</p> <p>Noted.</p> <p>Noted.</p>