

**Table A**

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*Responses-to-Comments*

**Table A Applicant’s Responses to Departmental Comments**

Departmental Comments		Applicant’s Responses
<b>A.</b>	<b>Drainage Services Department</b>	
1.	Having review the subject application, please find our comments below:	-
2.	The drainage proposal provided by the applicant is insufficient to demonstrate that adequate stormwater drainage collection and disposal facilities will be provided in connection with proposed development to deal with the surface runoff of the captioned site or the same flowing on to the site from the adjacent areas without causing any adverse drainage impacts or nuisance to the adjoining areas.	Please refer to a DIA Report ( <b>Annex G</b> )
3.	The applicant is also reminded that the public sewerage system along Ka Shue Road is being constructed under our Contract No. DC/2019/09 which might not be available for connection until the full commissioning of the entire public sewerage system along Clearwater Bay Road.	Please refer to a DIA Report ( <b>Annex G</b> )
4.	Section 2.2.2 - Stormwater Drainage Manual Corrigendum No. 1/2024 should also be adopted for drainage impact assessment. Also, currently only 16% of rainfall increase has been adopted for checking, see Appendix B.	Noted. The storm constant of SDM Corrigendum No. 1/2024 has been adopted. Section 2.2.6 has been revised. The calculation has been updated accordingly in Appendix B DIA Report ( <b>Annex G</b> ).
5.	Section 3.3.2 - Since there is no change on the landscape characteristics, please explain why there is a slight decrease of runoff before and after development	There are no major changes in the landscape characteristics, only with slightly decrease for the CxA (catchment area x runoff coefficient) factor. Hence, the runoff is slightly decrease. <b>C x A</b> Catchment A: Before - 632.8; After - 619.4 Catchment B: Before - 698.5; After - 685.4
6.	Figures - A figure showing the existing drainage network to receive the runoff should be provided.	Drainage record plan has been attached in Appendix B DIA Report ( <b>Annex G</b> ).
7.	Appendix B - Checking of the downstream existing drainage system is missing	The Site is currently a developed residential building site connected with drainage system as indicated in the drainage record plan in Appendix B DIA Report ( <b>Annex G</b> ).. This application seeks to redevelop the residential building within the Site, which is similar to current condition after the development. Effort has been put by the Applicant to maintain the soft landscape and paving condition that will not cause additional runoff. Hence,

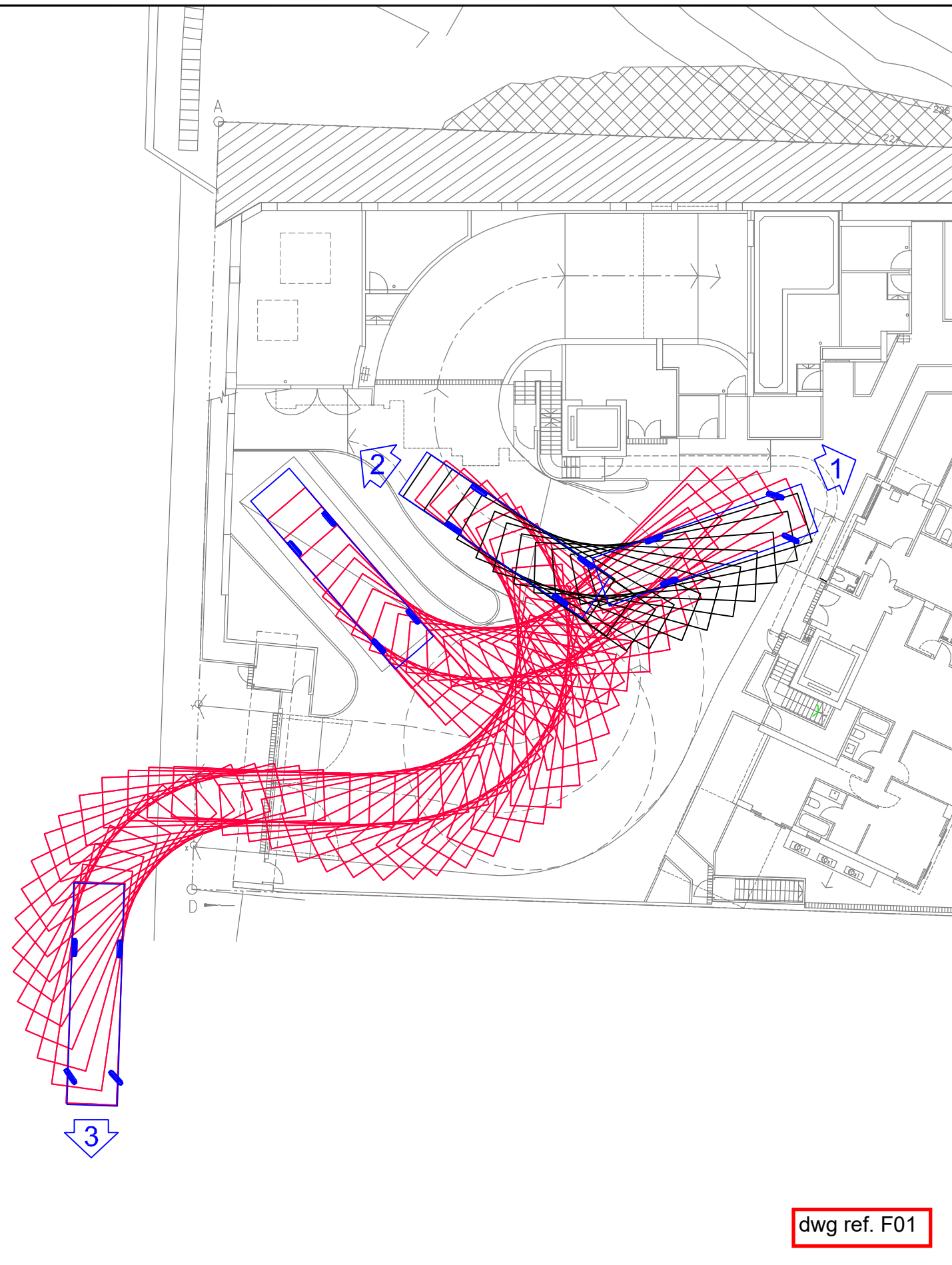
Departmental Comments		Applicant's Responses
		no adverse drainage impact to the downstream due to the redevelopment is anticipated. As such, no further calculation was indicated.
8.	There is no response to our previous comment no. 3 related to sewerage issue. Given that the public sewerage system may not be available for connection, views from EPD on disposal of sewage by means of sewage treatment works or septic tank/soakage pit should be sought.	Sewage treatment works will be provided if the public sewerage system is not available for connection.
<b>B. Urban Design and Landscape Unit, Planning Department</b>		
Landscape Section:		
1.	Please refer to our comments below from landscape planning perspective:	-
2	Figure 22 (Proposed Extents of Filling and Land Excavation Works within "GB" zone) - Please clearly indicate on plan i) s.16 application boundary, ii) "GB" zone boundary, iii) area of excavation, and iv) area of filling of land with appropriate legends;	Please refer to Figure 22a ( <b>Annex C</b> ).
3	Appendix II Table 3.2 (Planting Palette) i) Optimization of native species should be considered to enhance bio-diversity. Please highlight all the native species in the table for TPB's review; ii) Please highlight the proposed species for "weeping shrubs and climbers" (para.3.4.6) at edge planter ;	Please refer to the revised Table 3.2 of Appendix II ( <b>Annex E</b> ) incorporating the clarifications for i) and ii)
4	Appendix II Drawing No. SMC1-LMP01 (Landscape Master Plan) i) For clarity, please clearly indicate on the landscape plan the proposed area of "Stepped-terrace" (para. 3.2.8) and "Sunken garden" (para. 3.2.9); ii) Please clearly indicate the extent and height of the fence/retaining wall structures along the site boundary;	Please refer to the revised SMC1_LMP01 in Appendix II ( <b>Annex E</b> ).
5	Please provide the typical section/details for "multi-level planters" (para. 3.2.2) along Ka Shue Road and vertical greening along the southern boundary of the site.	Please refer to the revised drawing No. SMC1_DE_02 in Appendix II ( <b>Annex E</b> ).

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	Urban Design Section:	
6.	Some errors in the VIA report are identified as follows:	
7.	(a) VIA Para. 3.33 – The proposed rooftop greening cannot be seen from VP5 as shown in the photomontage of VP5 (Photo E2 of Plan 16).	Please refer to the revised VP5 and the revised paragraph 3.33 of the VIA in Appendix VI ( <b>Annex H</b> ).
8.	(b) VIA Para. 4.1 – It should read "...and site coverage from 30% to <del>34</del> <b>37</b> %..."	Revised to "... site coverage from 30% to about 31.09% (gross site area) or from 30% to about 34% in the present revised scheme (solely within on site R (C) 1 area)" in Appendix VI ( <b>Annex H</b> )
<b>C. Transport Department</b>		
1.	Please provide the junction assessment taking into account of the increase from 8 flats to 14 flats to substantiate para. 6.11.	A junction traffic assessment ( <b>Annex E</b> ) is attached.
2.	Please provide the swept path analysis for the loading and unloading area.	Please refer to revised dwg. Ref. F01 and F02 attached in <b>Table A</b> .
3.	Re. Figures 13 and 14, the dimension of the internal road and vehicular access shall be indicated.	Figures 13a and 14a ( <b>Annex C</b> ) have indicated such information accordingly.
<b>D. Buildings Department</b>		
1.	Unless the proposed site abuts on a specified street complying with the requirements under Building (Planning) Regulations (B(P)R) 18A(3) and not less than 4.5m wide, the development intensity of the site should be determined by the Building Authority under B(P)R 19(3);	The site abuts onto Ka Shue Road which is of sufficient width (~7.3m)
2.	Every domestic building within the site shall be provided with an open space complying with the Second Schedule under B(P)R 25;	Sufficient open space would be provided accordingly within the site to serve Tower 1 and Tower 2.
3.	Emergency vehicular access complying with B(P)R 41D shall be provided for all buildings in the site;	EVA would be provided with sufficient coverage to serve the facades of Podium, Tower 1 and Tower 2
4.	PNAP APP-2 Hong Kong Planning Standards and Guidelines (HKPSG) and the advice of Commissioner for Transport will be refined to when determining exemption of GFA calculation for aboveground or underground carparking spaces;	One carparking space has been provided for persons with disability.
5.	Carparking Spaces for persons with a disability should be provided in accordance with the Design Manual: Barrier Free Access 2008, Division 3, Para. 8 and 9;	Sufficient disabled parking spaces would be provided in accordance with Design Manual: Barrier Free Access 2008
6.	The applicants attention is also drawn to the policy on GFA	The 10% overall cap on GFA concession under PNAP APP-151 and SBD

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	concessions under PNAP APP-151 in particular the 10% overall cap on GFA concessions and, where appropriate, the SBD requirements under PNAP APP-152; and	requirements under PNAP APP-152 would be complied with.
7.	Further justification should be provided for the floor to floor height for the Lower Ground Floor. Detailed Comments will be given during GBPs submission stage.	Refer to the FI documents and F1-F11 ( <b>Annex A</b> ) have outlined the reasons why additional floor-to-floor height of LG/F is required.
<b>E. Responses to Public Comment</b>		
1.	不應該在上址興建較大型的屋宇會破壞綠化地帶的環境！亦會對河流做成污染，因此反對上述申請。	此規劃議擬在「綠化地帶」土地部分的種樹，所有擬議建築發展工程僅局限於「住宅(丙類)1」用途地帶內。
2. (i)	I am writing to express my strong objection to the proposed redevelopment at Lot No. 1109 RP in D.D. 253, 8 Ka Shue Road, Sai Kung, New Territories. My objections are based on several environmental and practical concerns:	-
(ii)	Environmental Impact: a) Unnecessary Tree Felling: The proposed development will likely result in the removal of mature trees, negatively impacting local biodiversity and green cover. b) Demolition Waste: The demolition of existing structures will generate significant waste, adding pressure to Hong Kong's already strained landfills. c) Air and Noise Pollution: Both the demolition and construction phases will create substantial air and noise pollution, adversely affecting local residents and wildlife.	a) Compensatory trees has been proposed according to the ratio as approved by District Lands Officer. b) Code of Practice for Demolition of Buildings would be fully complied with so that demolition waste will be within acceptable levels. c) Code of Practice for Demolition of Buildings would be fully complied with to ensure both dust and noise levels would be within acceptable levels during restricted hours.
(iii)	Unjustified Building Height Increase: a) The application fails to provide concrete evidence of demand for higher ceiling apartments in this specific area. b) The link to government objectives of "attracting and retaining talents" is tenuous at best and does not justify the environmental costs.	a.) The proposed redevelopment will need to tackle inter-locking site constraints and building requirements. It would be a high-end residential development to meet the needs of the community. The proposed ceiling heights are not uncommon in Hong Kong. b.) The proposed scheme is a redevelopment of existing old buildings in "R(C)1" zone. No significant environmental impact will be anticipated.
(iv)	Energy Inefficiency: a) The proposed taller glass windows and increased ceiling height will result in greater heat gain, necessitating more energy-intensive cooling. b) This increased energy demand contradicts Hong Kong's commitment to reducing its carbon footprint.	a) The larger openable window area from the increased height would result in increased natural lighting for habitants, improved natural ventilation and reduce heat gain. It is a green building design. b) The improved natural ventilation would reduce the need for energy-intensive cooling

(v)	Lack of Consideration for Alternatives: a) The application does not adequately explore the option of renovating the existing site, which would be a more environmentally friendly and resource-efficient approach.	The development will lead to greater long-term benefits compared to renovations, including provision of new housing supply to meet future demands. The construction process would adapt a resource-efficient approach to minimize construction wastes.
(vi)	Precedent Setting: Despite claims to the contrary, approving this application could set a dangerous precedent for future developments in the area, potentially leading to further erosion of green spaces and environmental protections.	This development would serve as a net positive as it delivers new housing supplies and updated green building and energy-efficient building designs in harmony with the surrounding green areas.
(vii)	Impact on "Green Belt" Zone: The proposed filling and excavation of land in the "Green Belt" area, even if for landscaping purposes, risks disturbing the natural ecosystem and drainage patterns. In light of these concerns, I urge the Town Planning Board to reject this application. Instead, I propose that the applicant be encouraged to explore renovation options for the existing structures that would improve energy efficiency and living conditions without the need for extensive redevelopment and environmental disruption. The focus should be on sustainable development that preserves our natural heritage, minimizes waste, and truly aligns with Hong Kong's environmental goals. This project, as proposed, fails to meet these crucial criteria.	All planting areas. Proposed in the "GB" site are relatively a flat piece of land and parts of it have been paved in the existing site condition. The proposed new trees will involve flowering species which will enhance the local biodiversity when compared to that in the present site conditions.
3.(i)	Object to further incursion and excavation of GB zoning. Members should also refer to the recent discussion on a similar scenario in Stanley.	Noted
(ii)	The Chairperson supplemented that a number of "R(C)" zones on OZPs were subject to a combination of development restrictions including PR, BH and SC. There was a fixed three-way relationship among the three parameters to control the built form and development intensity with a view to maintaining the character and amenity of an area.	The relevant restrictions on PR, BH and SC have been fully complied
(iii)	Also, the detail in the visuals of the current and proposed schemes are different and make it impossible to gauge the impact.	The Visual Impact Assessment ( <b>Annex H</b> ) has demonstrated the proposed redevelopment scheme will not result in any significant adverse or unacceptable visual impact on the local area.
(iv)	The developer can choose to provide homes with higher ceilings	The proposed redevelopment has a stringent requirement for the transformer

	<p>via the simple process of reducing the number of floors. The OZP imposes height restrictions. That every development or redevelopment trots out the same excuses for relaxation makes a mockery of the intention behind the restrictions.</p>	<p>room and the ancillary facilities, i.e. an extension on the ramp gradient, the minor relaxation of the Building Height is necessary to cater such straight requirement.</p> <p>Compared to the existing development, the proposed scheme needs to tackle a series of inter-locking site constrains, including limited land area, substantial level difference between Ka Shue Road and the site, provision of a new TX Room with sensitive and stringent spatial requirements, the need to utilize the permissible GFA being granted under the government lease, and planning to go for higher residential apartments to meet the needs of the community. The proposed building height is the bare minimum to achieve the above. Each case should have its own merits for consideration.</p>
4.(i)	<p>請提供施工日期及詳細施工時間表，並確保工程已得到政府部門但不限於包括屋宇處、地政處、路政署、環保署等批准：</p>	<p>知悉，會在獲得城規會的准許後商討相關事宜。</p>
(ii)	<p>本法團建議星期六、星期日及公眾假期不可以施工：</p>	
(iii)	<p>施工期間如有大型工程車輛出入施工地盤，期間必須有工作人員指揮交通：</p>	
(iv)	<p>施工地盤的所有車輛引致嘉澍路行車路面及行人路出現污漬包括泥沙頭等，必須每日作出清理/清洗：</p>	
(v)	<p>嘉澍路及行人路不可以停泊車輛及擺放任何物品物料，以免阻擋曉嵐閣業主及居民。</p>	
(vi)	<p>不可以擅自掘路基進行對路面改動工程。</p>	
(vii)	<p>行之已久而最公平的規劃和政策是「用者自付」，旨在讓使用嘉澍路的人士能夠共同支付維修保養費用，而不是由部分業戶一力承擔。因此本法團強烈建議嘉澍路的維修保養責任，由曉嵐閣業戶及清水灣共同分擔。</p>	



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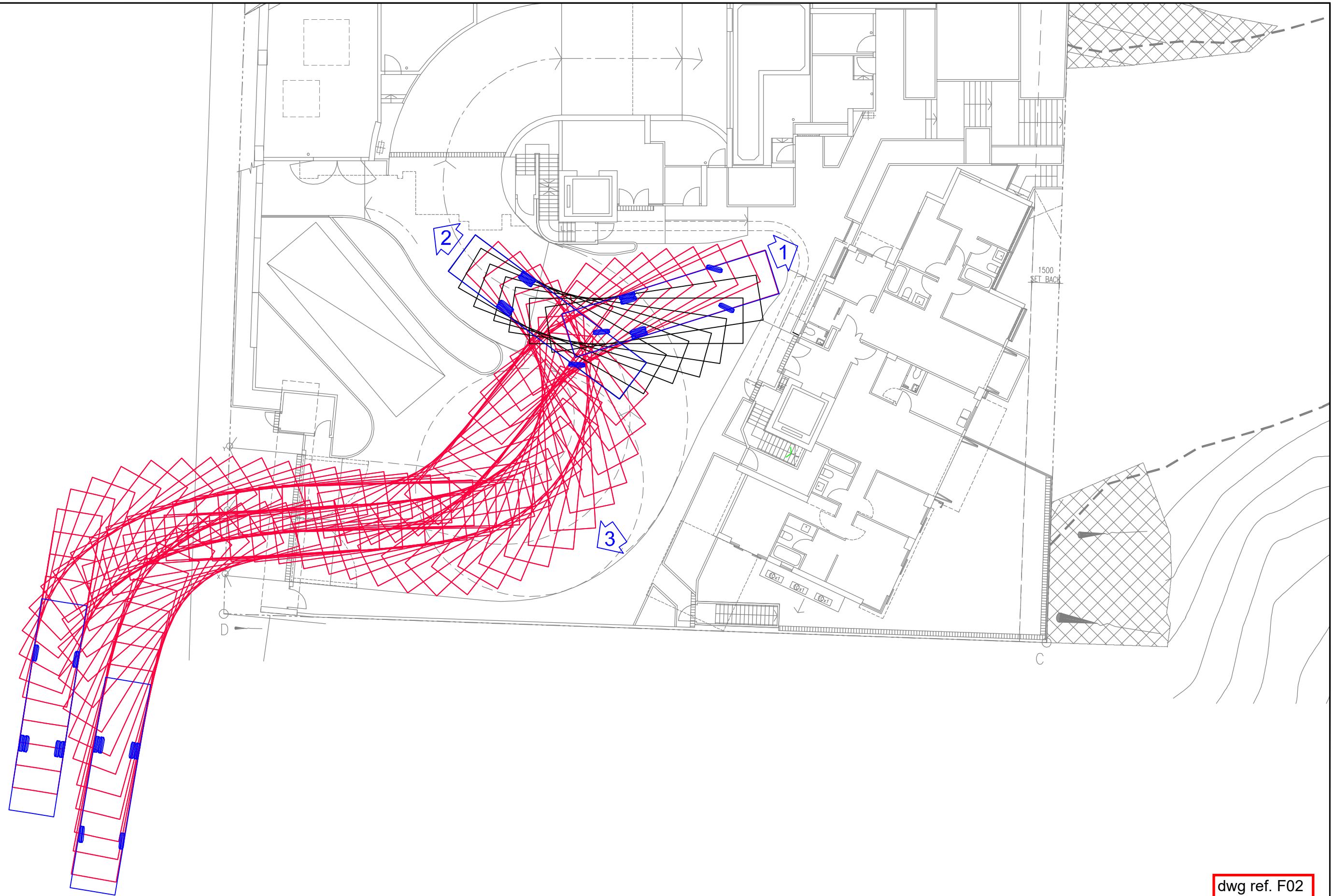


Project Title	TRAFFIC ENGINEERING CONSULTANCY SERVICES – RESIDENTIAL REDEVELOPMENT AT 8 KA SHUE ROAD, SAI KUNG, TSEUNG KWAN O
Figure Title	SWEPT PATH ANALYSIS OF A 11m HGV IN AND OUT OF THE L/UL BAY

Scale	1 : 250	Date	SEP 2024	Figure No.	1
Project No.	J1732	CAD Ref.	J1732/SWP12/F01/2024-09-27	Rev.	-

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dwg ref. F02



Project Title TRAFFIC ENGINEERING CONSULTANCY SERVICES – RESIDENTIAL REDEVELOPMENT AT 8 KA SHUE ROAD, SAI KUNG, TSEUNG KWAN O

Scale 1 : 200

Date SEP 2024

Figure No. 2

Figure Title SWEPT PATH ANALYSIS OF A 11.7m FIRE ENGINE IN AND OUT OF THE L/UL BAY

Project No. J1732

CAD Ref. J1732/SWP12/F02/2024-09-27

Rev. -