Annex C
Revised Supporting Planning Statement

ARUP

Application for Permission under Section 16 of the Town Planning Ordinance (Cap. 131) for Submission of Layout Plan and Proposed Minor Relaxation of Plot Ratio and Building Height Restriction for Permitted Flat at "Residential (Group C)7" zone at the Ebenezer School and Home for the Visually Impaired, 131 Pok Fu Lam Road, Pok Fu Lam, Hong Kong

Supporting Planning Statement

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This report takes into account the particular instructions and requirements of our client. It is not intended for and should not be relied upon by any third party and no responsibility is undertaken to any third party.

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Executive Summary

This Planning Application is submitted to under Section 16 of the Town Planning Ordinance (Cap. 131) to seek approval from the Town Planning Board (TPB) for Submission of Layout Plan and Proposed Minor Relaxation of Plot Ratio (PR) and Building Height Restriction (BHR) for Permitted Flat at "Residential (Group C)7" zone at the Ebenezer School and Home for the Visually Impaired, 131 Pok Fu Lam Road, Pok Fu Lam, Hong Kong (the Application Site).

The Application Site, with an area of 6,460m^2, falls within an area zoned as "Residential (Group C)7" ("R(C)7") on the Approved Pok Fu Lam Outline Zoning Plan No. S/H10/23 (Pok Fu Lam OZP). According to the Notes of the Pok Fu Lam OZP, 'Flat' use is always permitted under Column 1 uses of the "R(C)" zone. Development at the Application Site is subject to a maximum plot ratio of 1.9 and a maximum building height of 151mPD, or the plot ratio and height of existing building, whichever is the greater. It is stated in Remarks (6) of the Notes that based on the individual merits of a development or redevelopment proposal, minor relaxation of the plot ratio and building height restrictions may be considered by the Town Planning Board on application under section 16 of the Town Planning Ordinance. In addition, for any new development or redevelopment of an existing building at sub-area "R(C)7", a layout plan shall be submitted for the approval of the TPB.

The Proposed Development seeks approval from the TPB for the submission of layout plan and the required associated information, i.e. the environmental assessment and sewerage impact assessment, and the proposed minor relaxation of PR from 1.9 to 1.941 and BHR from 151mPD to 164mPD for permitted 'Flat' use at the Application Site. The Proposed Scheme comprises of a PR of not more than 1.941 and a building height of not more than 164mPD to provide planning merits for the benefit of the community, facilitate the continuous provision of education and social welfare facilities for the visually impaired, optimize the Site for housing provision, and also refine the Proposed Scheme based on the TPB's comments on the previous Section 16 application. Specifically, the Proposed Scheme has included a feasible bus layby to support public transportation access and improve local commute experience while maintaining the existing pedestrian footpath along Pok Fu Lam Road for dedicated public patronage and a maintenance walkway for government inspection of the existing highway and slope structures.

The Planning Application is expected to achieve the following public planning and design benefits under the Proposed Scheme:

- Align with the Planning Intention of "R(C)7" Zone;
- Proposed Scheme Incorporates the Planning and Design Merits in Response to the TPB's Previous Comments;
- A Justified Minor Relaxation of Plot Ratio and Building Height: Optimising Valuable Land Resources for Housing with Planning and Design Merits for Public Benefits;
- Proposed Minor Relaxation of Building Height Restriction is Compatible with the Existing and Planned Surroundings;
- Enhance the Overall Landscape and Visual Amenity; and
- Generating No Insurmountable Impacts to the Surrounding Area.

In light of the planning merits and justifications put forward in the Supporting Planning Statement, we sincerely seek favourable consideration from the Town Planning Board on this Section 16 Planning Application.

行政摘要

（內容如有任何差異，應以英文內文為準）

本規劃申請根據《城市規劃條例》（第 131 章）第 16 條提出，旨在向城市規劃委員會（下稱「城規會」）就位於香港薄扶林薄扶林道 131 號心光盲人院暨學校劃為「住宅（丙類）7」地帶（下稱「申請地點」）內，呈交發展藍圖並擬議略為放寬地積比率及建築物高度限制作准許的住宅用途申請規劃許可。

申請地點面積約為 6,460 平方米，位於薄扶林分區計劃大綱核准圖編號 S/H10/23（下稱「薄扶林分區計劃大綱圖」）的「住宅（丙類）7」地帶。根據薄扶林分區計劃大綱圖的註釋，「分層住宅」用途列於「住宅（丙類）」地帶土地用途表的第一欄，屬經常准許的用途。申請地點准許的最高地積比率及最高建築物高度分別為 1.9 及主水平基準上 151 米，或不得超過現有建築物的地積比率和高度，兩者中以數目較大者為準。註釋備註（6）指出，城規會如接獲根據《城市規劃條例》第 16 條提出的申請，可按個別發展或重建計劃的情況，考慮略為放寬地積比率及建築物高度限制。此外，就位於「住宅（丙類）7」支區內任何新發展或現有建築物的重建，都必呈交一份發展藍圖，以供城市規劃委員會核准。

擬議發展向城規會申請規劃許可呈交發展藍圖及相關所需資料，包括環境評估報告及排污影響評估報告，擬議略為放寬地積比率及建築物高度限制，最高地積比率由 1.9 放寬至 1.941 ，而建築物高度限制則由主水平基準上 151 米放寬至主水平基準上 164 米作准許的住宅用途。擬議方案的最高地積比率不超過 1.941，而最高建築物高度不超過主水平基準上 164 米，以期在符合規劃意向的前提下，為社區帶來規劃及設計裨益，促進視障人士教育及社會福利設施的持續運作，善用申請地點以提供住宅發展，並同時因應城規會就先前第 16 條規劃申請所提出的意見，進一步優化擬議方案。具體而言，擬議方案已納入一個可行的巴士停靠處以支援公共交通接駁及改善區內出行體驗，同時保留現有沿薄扶林道的行人路，以供公眾使用，並設置一條維修通道，以便政府部門進行現有公路及斜坡結構的檢查和保養工作。

擬議方案預期可帶來以下公眾規劃及設計增益：

- 符合「住宅（丙類）7」地帶的規劃意向；
- 擬議方案回應城規會就先前申請所提出的意見融入相應的規劃及設計優點；
- 地積比率及建築物高度的輕微放寬具備充分理據：善用珍貴土地資源以作住宅發展，並加入規劃及設計裨益，為社會帶來效益；
- 擬議略為放寬建築物高度限制與現有及已規劃的周邊發展相互兼容；
- 提升整體園境及視覺環境；及
- 不會對周邊地區造成不可克服的負面影響。

基於本規劃綱領所闡述的規劃理據及規劃優點，我們謹此懇請城市規劃委員會支持是次第 16 條規劃申請。

1. INTRODUCTION

1.1.1.1 This Supporting Planning Statement is submitted to the Town Planning Board (TPB) on behalf of the Applicant, Ebenezer School and Home for the Visually Impaired Limited, under Section 16 (s.16) of Town Planning Ordinance (TPO) (Cap. 131), to seek approval for Submission of Layout Plan and Proposed Minor Relaxation of Plot Ratio and Building Height Restriction for Permitted Flat at "Residential (Group C)7" zone at the Ebenezer School and Home for the Visually Impaired, 131 Pok Fu Lam Road, Pok Fu Lam, Hong Kong (referred as the Application Site or the Site hereafter).

1.1.1.2 The Application Site falls within an area zoned as "Residential (Group C)7" ("R(C)7") on the Approved Pok Fu Lam Outline Zoning Plan No. S/H10/23 (Pok Fu Lam OZP or the OZP). The Planning Intention of "R(C)" is *intended primarily for low to medium-rise and low to medium-density residential developments*. According to the Notes of the OZP, for sub-area "R(C)7", *no new development, or addition, alteration and/or modification to or redevelopment of an existing building shall result in a total development and/or redevelopment in excess of a maximum plot ratio of 1.9 and a maximum building height of 151 metres above Principal Datum, or the plot ratio and height of existing building, whichever is the greater*. In addition, for any new development or redevelopment of an existing building at sub-area "R(C)7", a layout plan which includes the following information shall be submitted for the approval of the TPB:

i. the proposed land use(s), and the form, disposition and heights of all buildings (including structures) to be erected on the site;

ii. the proposed total gross floor area for various uses and facilities;

iii. an environmental assessment report to examine any possible environmental problems in terms of air quality and traffic noise that may be caused to the Proposed Development and the proposed mitigation measures to tackle them;

iv. a sewerage impact assessment report to examine any sewerage problem that may be caused by the Proposed Development and the proposed mitigation measures to tackle them; and

v. such other information as may be required by the Town Planning Board.

1.1.1.3 The Proposed Development seeks approval from the TPB for minor relaxation of PR from 1.9 to 1.941 and BHR from 151mPD to 164mPD for 'Flat' use which is under Column 1 use and always permitted by the TPB. Various planning and design principles have been considered in formulating the Proposed Scheme. They include providing planning merits for the benefit of the community, akin to the previous "G/IC" zone of the Site; facilitating the continuous provision of education and social welfare facilities for the visually impaired; optimizing the Site for housing provision; and to also refine the Proposed Scheme based on the TPB's comments on the previous s.16 application. The Proposed Development is fully justified with planning and design merits, including the provision of a feasible bus lay-by and maintenance of existing footpaths along Pok Fu Lam Road for dedicated public patronage; provision of free access from the Site to the proposed maintenance walkway for government inspection of existing highway and slope structures; provision of vertical and horizontal greening as roadside or greening amenity; and putting forward meticulous consideration of site formation levels to reduce excavation extents. With reference to the various technical assessments conducted on the Application Site, no significant adverse impacts to the surroundings are anticipated. Approval of this s.16 application shall not set an undesirable precedent in the Pok Fu Lam area.

1.1.1.4 This Supporting Planning Statement is outlined in accordance with the following sections for demonstration of its technical feasibility and planning merits:

- **Section 2** outlines the existing site context which includes the location, land status, current and surrounding land uses and accessibility;
- **Section 3** discusses the planning context of the Site, including the land use zoning and planning history;
- **Section 4** outlines the scheme for the Proposed Development;
- **Section 5** provides the planning justifications; and
- **Section 6** concludes the Supporting Planning Statement to seek favorable consideration and approval from the TPB.

2. SITE CONTEXT

2.1 Location

2.1.1.1 The Application Site is located at 131 Pok Fu Lam Road, Pok Fu Lam, Hong Kong, with a rectilinear site elongating along the western side of the Pok Fu Lam Road and abutting the slopes to the southwest of Victoria Road with an approximate site area of 6,460 m^2. The Application Site is bounded by Pok Fu Lam Road to the north, the Ebenezer New Hope School to the east, a slope abutting the Victoria Road to the south and west.

2.1.1.2 **Figure 2.1** refers to the location of the Application Site.

2.2 Land Status

2.2.1.1 The Application Site falls within the Remaining Portion of Rural Building Lot (RBL) No. 136 (referred as the Lot hereafter). According to the records of the Land Registry, the Lot was granted under lease for 75 years less the last 3 days from 19 June 1989. The registered owner is "The Ebenezer School and Home for the Visually Impaired Limited", which is the Applicant, and the sole owner of the Lot.

2.2.1.2 The Lot is virtually unrestricted with the exceptions of the following lease conditions[1]:

- A right of way from Pok Fu Lam Road;
- Prohibition of offensive trades; and
- Requirement to form paths of 12 feet in width along the northern, western and southern boundaries of the lot.

2.2.1.3 **Figure 2.2** refers to the Lot Index Plan of the Application Site.

2.3 Existing Use

2.3.1.1 Situated on a relatively flat topography (ranging from about 128mPD to 129mPD, i.e. approximately 10m below the Pok Fu Lam Road), the Application Site is currently occupied by existing buildings at a height of about 151mPD (at main roof level excluding rooftop structures). They consist of the Ebenezer School & Home for the Visually Impaired (i.e. Old Wing) and Ebenezer School Jockey Club New Wing (6 to 7 storeys), the Old Age Home (4 storeys) currently vacant, and a single-storey carport.

2.3.1.2 The Application Site has been occupied by The Ebenezer School and Home for the Visually Impaired to provide educational and social welfare services to the visually impaired since the 1930s. Established in 1955, the Old Age Home was relocated in 1995 and is currently left vacant. The Old Wing was completed in 1962 and the Jockey Club New Wing was completed in 1995.

2.3.1.3 Since the 1930s, the Application Site has served a crucial role for the visually impaired for providing comprehensive educational, rehabilitation, career and boarding services for children, residential care and nursing facilities for the elderly, and also employment training for the visually

[1] With reference to MPC Paper No. A/H10/97B for consideration by the Metro Planning Committee on 16 August 2024

impaired. As of 2024/2025, the Site serves more than 400 visually impaired persons. However, the wide range of services it provides, coupled with the gradual deterioration of the Site over its 60-year history, presents opportunities to enhance the existing facilities to better serve the visually impaired and to optimize the Site for other purposes, in harmony with the surrounding residential character.

2.3.1.4 **Figure 2.3** refers to the existing condition of the Application Site.

2.4 Surrounding Land Uses

2.4.1.1 The Application Site is surrounded by medium-rise residential developments, various government, institution and community ("GIC") facilities, such as clusters of facilities of the University of Hong Kong ("HKU"), Queen Mary Hospital, primary and secondary schools, and vegetated slopes abutting Victoria Road and Pok Fu Lam Road.

2.4.1.2 To the **immediate north** of the Site across Pok Fu Lam Road are various medium-rise residential developments including Royalton and Royalton II (216mPD), Radcliffe (216mPD), Dor Fook Mansion (182mPD) and Jessville Tower (227mPD). To the **immediate northwest** is a "Government, Institution or Community (1)" ("G/IC(1)") site is reserved for HKU's Faculty of Medicine campus expansion with a maximum BHR of 164mPD. To the **further north and northwest** are mainly GIC facilities, including the Queen Mary Hospital (177mPD to 231mPD), cluster of HKU facilities (123mPD to 190mPD), staff/student accommodations along Sassoon Road (187mPD) and Caritas Wu Cheng-chung Secondary School (115mPD).

2.4.1.3 To the **immediate east** of the Site across Pok Fu Lam Road are also medium-rise residential developments, such as Alberose (189mPD) and Middleton Towers (201mPD to 203mPD) and to the **further east** are vegetated slopes under "Green Belt" zone and "Country Park" areas within the Pok Fu Lam Country Park.

2.4.1.4 To the **immediate west and southwest** of the Site are vegetated slopes zoned "Undetermined" ("U"). In accordance with the ES of the OZP, the "U" zone is intended to allow HKU to review its original plan for the Global Innovation Centre. Based on the latest information from the Southern District Council, the new proposed site would include the adjacent "Residential (Group C)6" site with the building height proposed to be 154mPD to 158mPD[2]. To the **further west** across Victoria Road are vegetated slopes zoned "Green Belt" and primary and secondary school clusters of the Independent Schools Foundation Academy.

2.4.1.5 To the **immediate south** of the Site is Ebenezer New Hope School (Lot RBL 1015) (141mPD), which does not form part of the Application Site and shall continue to be operated by the Ebenezer. To the **further south** are vegetated slopes, currently vacant government land zoned "Residential (Group C)6" ("R(C)6"), and the Woodbury Court, a 20-storey residential development (218mPD). The "R(C)6" site is considered as part of the new proposed site for the Global Innovation Centre, with the building height proposed to be 154mPD to 158mPD[3].

2.4.1.6 **Figure 2.4a – 2.4d** refers to the surrounding context of the Application Site.

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[2] Source: Southern District Council (January 2026)
https://www.districtcouncils.gov.hk/south/doc/2024_2027/en/dc_meetings_doc/31459/S_2026_13_TC_ppt_1.pdf

[3] Source: The University of Hong Kong (11 July 2025). Report to the Town Planning Board Meeting.
https://www.tpb.gov.hk/uploads/page/meetings/20250711/TPB_Report_on_GIC_English.pdf

2.5 Accessibility

2.5.1.1 The Site is directly accessible by vehicles and pedestrians via Pok Fu Lam Road to the immediate north and northeast of the Application Site. The existing Ebenezer School at the Site is currently accessible via a private access road to / from Pok Fu Lam Road, which is shared use by the Ebenezer School and the Ebenezer New Hope School. Franchised bus and minibus services are immediately available along Pok Fu Lam Road.

3. PLANNING CONTEXT

3.1 Land Use Zoning

3.1.1.1 The Application Site falls within the Approved Pok Fu Lam Outline Zoning Plan No. S/H10/23. The Site falls wholly within the "R(C)7" zone (100%).

3.1.1.2 According to the Notes of the OZP, the "R(C)" zone is intended primarily for *"low to medium-rise and low to medium-density residential developments where commercial uses serving the residential neighbourhood may be permitted on application to the Town Planning Board*". The Proposed Development is intended for 'Flat' use, which is under Column 1 use and is always permitted by the TPB. It is also stated in the Notes of the OZP that, "*for sub-area "R(C)7", no new development, or addition, alteration and/or modification to or redevelopment of an existing building shall result in a total development and/or redevelopment in excess of a maximum plot ratio of 1.9 and a maximum building height of 151 metres above Principal Datum, or the plot ratio and height of existing building, whichever is the greater*".

3.1.1.3 In addition, for any new development or redevelopment of an existing building at sub-area "R(C)7", a layout plan which includes the following information shall be submitted for the approval of the TPB:

vi. the proposed land use(s), and the form, disposition and heights of all buildings (including structures) to be erected on the site;

vii. the proposed total gross floor area for various uses and facilities;

viii. an environmental assessment report to examine any possible environmental problems in terms of air quality and traffic noise that may be caused to the Proposed Development and the proposed mitigation measures to tackle them;

ix. a sewerage impact assessment report to examine any sewerage problem that may be caused by the Proposed Development and the proposed mitigation measures to tackle them; and

x. such other information as may be required by the Town Planning Board.

3.1.1.4 Remarks (6) of the R(C) zone stipulates that "*Based on the individual merits of a development or redevelopment proposal, minor relaxation of the plot ratio, site coverage and building height restrictions as stated in paragraphs (1) and (2) above may be considered by the Town Planning Board on application under section 16 of the Town Planning Ordinance.*"

3.1.1.5 For details, please refer to the extracted Notes and Explanatory Statement of "R(C)7" in **Figures 3.1a – Figure 3.1f**.

3.2 Planning History of the Application Site

3.2.1.1 The Application Site has undergone a prolonged planning history involving multiple rezoning applications for redevelopment into residential purposes since 2007[4]. Such redevelopment would, in turn, enable the relocation of the Ebenezer and the provision of a new school and home with enhanced facilities for the visually impaired. The latest Section 12A (s.12A) application (No. Y/H10/14) was partially agreed by the TPB on 6 May 2022 to rezone the site to "R(C)7" zone for a residential development, which was subsequently incorporated as proposed amendments to the Draft Pok Fu Lam OZP No. S/H10/20. On 30 May 2023, the Chief Executive in Council approved the draft OZP incorporating the rezoning of the Site to "R(C)7" and was reflected on the Approved Pok Fu Lam OZP No. S/H10/21.

3.2.1.2 Upon the approval of the draft OZP, the Application Site was subject to a previous s.16 planning application (No. A/H10/97) for a planning permission for submission of layout plan and proposed minor relaxation of BHR for permitted 'flat' use ("The Previous Scheme") to put forward the redevelopment of the Application Site. The Previous Scheme, covering a site area of about 6,460m^2, proposes residential development with a PR of not more than 1.9 and a maximum building height of 164mPD, providing a total of 135 residential units. Nonetheless, this Previous Scheme has been rejected by the TPB on 16 August 2024 under s.16 of the TPO and remained rejected on 27 June 2025 under s.17 of the TPO with the following reasons:-

"(a) the applicant fails to demonstrate that the proposed development as shown on the layout plan has no adverse traffic impact on Pok Fu Lam Road; and

(b) the applicant fails to demonstrate that there are sufficient planning and design merits to justify the proposed minor relaxation of building height restriction."

3.2.1.3 Taking into consideration the concerns from the TPB, the Applicant is keen to refining the development proposal for the Application Site by presenting a refined scheme and enhanced with planning and design merits.

[4] The first proposed amendment of plan under s.12A of the Town Planning Ordinance was Case No. Y/H10/1 for rezoning the Application Site from "G/IC" to "R(C)" for residential development, which was rejected / not agreed by the TPB on 24 August 2007.

4. PROPOSED DEVELOPMENT

4.1 General Planning and Design Principles

4.1.1.1 The Proposed Scheme has been meticulously prepared in accordance with the planning and design intentions specified on the current OZP.

4.1.1.2 **Provision of Planning Merits Intended for Serving the Needs of the Community in Previous "G/IC" Zone** – The Application Site was previously zoned as "G/IC" which was intended to provide GIC facilities for serving the needs of the community. With reference to the proposed amendment to the Approved Pok Fu Lam OZP No. S/H10/21, which reflects the latest provision of GIC facilities in Pok Fu Lam area, the existing and planned provision of major GIC facilities are generally adequate, except for some facilities[5] which their long-term target will be adjusted progressively in a wider spatial context / cluster by the Social Welfare Department in the long-term planning and development process. While the major GIC facilities in the Pok Fu Lam area are generally adequate, it is still under one of the planning and design principles of the Proposed Scheme to provide public facilities for the benefit of the wider community. These public benefits include maintaining the existing footpath to ensure public accessibility, as well as the provision of a bus lay-by to support public transportation access and improve local commute experience. This will serve not only the residents but also the staff and visitors of the Ebenezer New Hope School and the wider Pok Fu Lam neighbourhood.

4.1.1.3 **Facilitate the Provision of Education and Social Welfare Facilities for the Visually Impaired** – The existing school buildings for the visually impaired, which were constructed over 60 years ago have opportunities for upgrading. To ensure the continuous provision of education and social welfare services, while also taking the opportunity to enhance such facilities, a relocation site has been identified. The submission of the layout plan with the Proposed Scheme proven technically feasible is one-step forward to enable the relocation of the Ebenezer and the construction of a new School and Home for the visually impaired.

4.1.1.4 **Optimization of the Site for Housing Provision while Ensuring Compatibility** – The relocation efforts shall optimize the Site for housing provision. The Proposed Development is a private sector initiative that does not require the mobilization of public resources. It ensures the timely provision of housing units by optimizing the use of the private lot, which is solely under the ownership of the Applicant. In conjunction, the Proposed Scheme aligns with the surrounding existing medium-rise residential developments and planned developments, with the existing stepped building height profile descending towards the seaside being maintained.

4.1.1.5 **Refinement of the Proposed Scheme Based on the TPB's Comments** – The Proposed Scheme is carefully refined based on the Planning Permission Review (s.17 of s.16 for A/H10/97) considered on 27 June 2025. The Proposed Scheme demonstrates that adverse traffic impact on Pok Fu Lam Road is not anticipated, including with the proposed bus lay-by. It also establishes sufficient planning and design merits to support the proposed minor relaxation of PR and BHR, factoring in the buffer area requirements to comply with air quality and noise standards under the HKPSG, maintaining the maintenance walkway for the highway structure and slope feature underneath, and for constructing the proposed bus lay-by for maintaining public accessibility.

4.2 Proposed Development Parameters

4.2.1.1 This s.16 Planning Application is primarily intended to seek planning permission for a layout plan and proposed minor relaxation of PR from 1.9 to 1.941 and BHR from 151mPD to 164mPD for a proposed residential development at the Application Site and to realize the planning and design concept illustrated above. The scheme with the proposed minor plot ratio and building height relaxation formed the "Proposed Scheme".

4.2.1.2 The Proposed Development comprises four residential blocks (T1 to T4) of nine to ten domestic storeys atop one level of lobby / clubhouse with a total domestic GFA of not more than 12,536.5m^2 (i.e. PR of not more than 1.941) and a maximum BH of 164mPD. A four-storey car parking/E&M block with levels underneath the entrance driveway from Pok Fu Lam Road is attached to the four residential blocks from east to west of the Site. **Appendix A** refers to the Architectural Drawings and **Table 4.1** refers to the proposed development parameters table of the Proposed Scheme.

Table 4.1 Proposed Development Parameters Table

Major Development Parameters	Proposed Scheme
Site Area	About 6,460 m^2
Total Domestic GFA	About 12,536.5 m^2 (including Bonus GFA [4]: About 262.5 m^2)
Recreational Facilities (Clubhouse) GFA [1]	Not more than 614 m^2
Total PR	Not more than 1.941 (including Bonus PR [4]: 0.041)
Site Coverage	Not more than 49% [5]
No. of Blocks	4
Maximum Building Height	Not more than 164mPD
Typical Floor to Floor Height	3.5m
No. of Storeys	• T1 – T3: 11 storeys (incl. lobby / clubhouse at LG/F) • T4: 10 storeys (incl. lobby / clubhouse at UG/F)
Number of Units	135
Private Open Space	Not less than 392 m^2
Parking Provision [2] • Private car • Visitor parking • Motor cycle • Loading / Unloading	 106 6 1 4 (for medium /heavy goods vehicle)
Design Population [3]	392

[1] According to PNAP APP-104, a maximum 5% of total domestic GFA could be applied for GFA concession for use as a clubhouse in a development with domestic GFA of up to 25,000 m^2 and is proposed to be exempted from GFA/PR calculations.

[2] According to PNAP APP-2, the proposed carpark underneath the EVA / driveway could be qualified as an underground carpark and is proposed to be exempted from GFA calculation under B(P)R 23(3)(b).

[5] With reference to MPC Paper No. 3/24 discussed on 1 March 2024, there will be shortfalls in the provision of sports centres, clinic/health centre, child care centre, community care services facilities, day rehabilitation services and integrated family services centres according to the population-based planning standards under HKPSG. However, as sports centre and clinic/health centre should be assessed on a district basis, their provision would be sufficient when assessed on a district basis. The provision of GIC facilities in the Pok Fu Lam Area is generally considered adequate.

[3] A Person-Per-Flat (PPF) ratio of 2.9 is adopted based on the average domestic household size in Southern District as reported in the 2021 Population Census published by the Census and Statistics Department.
[4] According to the Applicant, a bonus PR of about 0.041 (equivalent to a bonus GFA of about 262.5 m^2), calculated by five times the area so to be surrendered to the Government, will be claimed for the surrender of setback area for the purpose of public passage under B(P)R 22(2) for bus layby, geotechnical access and footpath, subject to approval by the Building Authority during detailed design stage.
[5] According to the First Schedule of B(P)R, the maximum percentage site coverage for domestic buildings within the Application Site is 49%.

4.3 Building Design

4.3.1 Provision of Bus Layby, Geotechnical Access and Footpath within the Site

4.3.1.1 The Proposed Scheme incorporates (1) a feasible 14m (L) x 2.75m (W) bus layby while maintaining the existing footpath with a minimum width of 2m to replace the on-street bus-stop, (2) a maintenance walkway with a clear width of 2.5m to existing the slope features at 135.7mPD, and (3) a footpath with a minimum width of 12 feet extending from Pok Fu Lam Road along the northern edge of the Site towards the western and southern boundaries of the Site. The proposed bus layby and maintenance walkway are provided in response to previous comments from the Transport Department and Highways Department while the proposed 12-feet wide footpath is intended to take forward the relevant lease requirements. To facilitate this, a portion at the northern part of the Application Site (about 52.5m^2 of Applicant's lot) is reserved to be surrendered to the Government for the purpose of public passage. While the arrangement of bonus plot ratio will be subject to approval by the Building Authority, a corresponding bonus plot ratio of about 0.041 is proposed in respect of this public passage provision and incorporated under the Application for proposed minor relaxation of plot ratio. In addition, a 2.3m tall green wall is proposed at the roof of the E/M block, which is at the eastern corner of the Site, facing Pok Fu Lam Road to enhance the visual amenity of greenery to the surroundings and soften the form of the structure, thus offering visual relief for passersby and residents nearby.

4.3.2 Sensitive Building Design and Disposition

4.3.2.1 The Proposed Scheme comprises four residential blocks arranged parallel to Pok Fu Lam Road, with a buffer area of 20m-setback from the kerbside of Pok Fu Lam Road to comply with air quality and noise standards under the HKPSG. In addition, a 20m building separation from Ebenezer New Hope School have been designed to enhance air ventilation, visual openness, daylight penetration and opportunities to improve the amenity of the area. Variations in building disposition and orientation have also been designed to avoid a potential walled effect, together with landscape treatments such as green walls and planters to reduce the perceived building mass.

4.3.3 Compatible Building Height

4.3.3.1 The proposed residential blocks will be constructed on a platform of about 121.7mPD, approximately 18m below the road level of about +139mPD. This platform design allows the building roof level to be contained at 164mPD, resulting in an overall building height comparable to the adjacent existing and proposed developments along the eastern side of the Pok Fu Lam Road, including the planned HKU's Faculty of Medicine campus expansion with a maximum BHR of 164mPD, the proposed Global Innovation Centre with proposed building height of 154mPD to 158mPD, and Woodbury Court (218mPD), and is also compatible with the surrounding developments across the northern side of the Pok Fu Lam Road such as Royalton and Royalton II (216mPD), Radcliffe (216mPD), Dor Fook Mansion (182mPD), and Jessville Tower (227mPD). The proposed building height is generally compatible with the surrounding medium-rise development character and stepped building height profile towards the seaward maintained.

4.3.4 Compliance with Sustainable Design Guidelines

4.3.4.1 To achieve a quality and sustainable built environment, the Proposed Scheme has been carefully designed to comply with PNAP APP-152, Sustainable Building Design Guidelines (SBD). The consideration of the three key building design elements of building separation, building setback and site coverage of greenery under the SBD have been incorporated in the Proposed Scheme to meet the requirement of SBD. A greenery coverage of not less than 20% is proposed in compliance with SBD Guidelines and DEVB Technical Circulate (Works) No. 3/2012.

4.4 Landscape Design Framework

4.4.1 Landscape Design Objectives

4.4.1.1 The design objectives for the Master Landscape Plan are to:

- Create a distinctive landscape which responds to the existing context, the architectural scheme proposals and the future resident to create a sense of community;
- Integrate the proposed development from a landscape and visual perspective with the existing and planned landscape context;
- Provide visual integration in views of the proposed building mass from the surrounding areas and provide vegetation screening and softening of the built-form in closer low-level views;
- Provide a quality, sustainable and accessible living environment for the enjoyment of the residents and visitors;
- Provide recreational spaces for the future residents; and
- Maximise opportunities for greening measures utilising tree and shrub planting and lawn and climbing plants with in the new landscape.

4.4.2 Landscape Master Plan

4.4.2.1 The landscape seeks to create an attractive external environment for the development, coordinating paving and planting design for residential entrances and open spaces with internal streetscape design to provide a unified contemporary appearance within a naturalistic setting in the immediate landscape surroundings. The design also aims to create a vibrant internal landscape area with attractive garden spaces and includes the boundary, arrival and leisure landscapes.

4.4.2.2 Vertical greening is incorporated as an integral landscape element to enhance the visual amenity and aesthetic quality of the Proposed Development. The proposed green wall at the E/M block fronting Pok Fu Lam Road aims to provide vegetation screening and soften the form of the structure, thus offering visual relief for passersby and residents nearby.

4.4.3 Tree Preservation Proposal

4.4.3.1 The majority of existing trees will be retained (70% of existing trees) or transplanted (6% of existing trees). For the minimal number of trees recommended for felling, there will be 1:1 compensatory tree on the site.

4.4.4 Open Space Provision

4.4.4.1 The Proposed Scheme has sought to provide adequate open space (1m^2 per person based on the predicted future population) in accordance with the requirements of the HKPSG. The design of the open space is based on the objective of providing high quality active and passive recreational facilities and features that will satisfy the needs of the future residents.

4.4.4.2 The Proposed Scheme will include no less than 392 m^2 of uncovered open space in total for resident's use. Since the current planned total resident population of the project is approximately 392 persons the proposals adequately satisfy the requirements for 1m^2 per person based on the predicted future population in accordance with the HKPSG.

4.4.5 Greenery Provision

4.4.5.1 The green coverage for the Application Site will not be less than 20% in accordance with Buildings Department Practice Notes PNAP APP-152 Sustainable Building Design Guidelines and DEVB Technical Circular (Works) No. 3/2012. This includes a minimum of 10% at the Primary Zone (within 15m of mean street level). The calculation of area is based on the uncovered areas of tree and shrub, lawn and groundcover planting; and an area of vertical greening. Approximately 1300m^2 (About 20.1%) of greenery area is proposed in this Proposed Scheme.

4.5 Traffic Arrangement, Pedestrian Connection and Internal Transport Facilities

Vehicular and Pedestrian Access

4.5.1.1 At present, the Site is directly accessible by vehicles and pedestrians via Pok Fu Lam Road to the immediate north and northeast of the Application Site. The existing Ebenezer School at the Site is currently accessible via a private access road to / from Pok Fu Lam Road, which is shared use by the Ebenezer School and the Ebenezer New Hope School. Franchised bus and minibus services are immediately available along Pok Fu Lam Road.

4.5.1.2 For the Proposed Development, site access shall be provided via the proposed run-in out along Pok Fu Lam Road to the north of the Site, which maneuvers to the proposed EVA / driveway of 6m in width and only left-in /left-out movements are allowed. A bus lay-by (14m length x 2.75m wide) could be provided to replace the on-street bus-stop if considered necessary. The footpath adjacent to the bus lay-by would be around 2m. In addition, the lease requirement of forming paths of 12 feet in width along the northern, western and southern boundaries of the Lot is also fulfilled, as demonstrated by the proposed footpath extending along the eastern, southern and western peripheries of the Site.

4.5.1.3 **Diagram 4.1** refers to the proposed vehicular and pedestrian access.

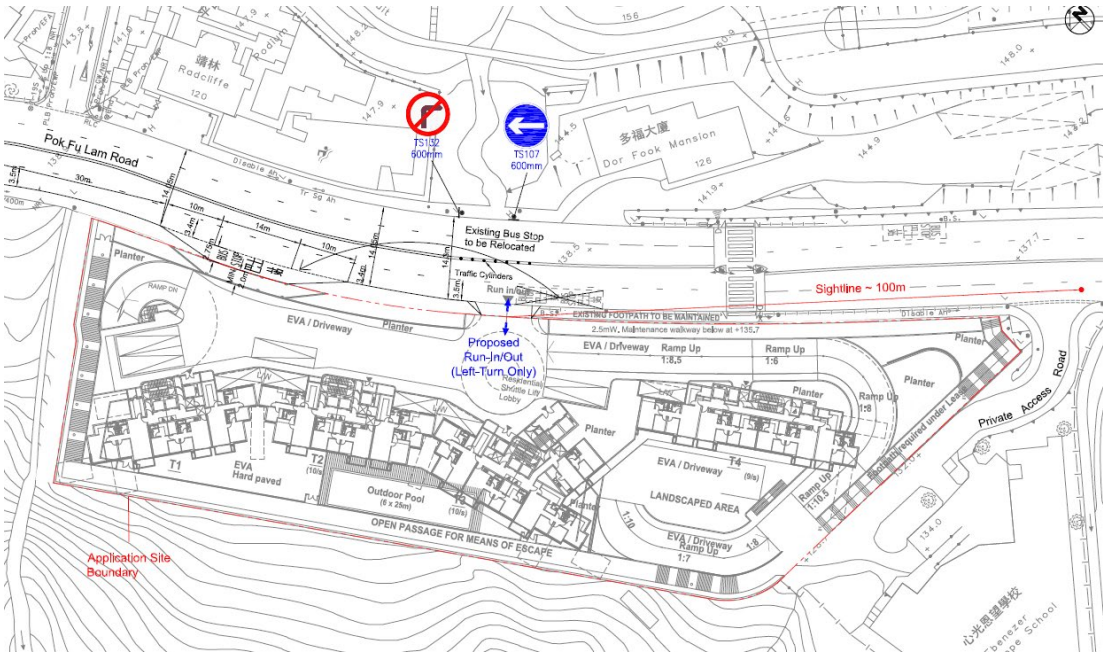


Diagram 4.1 Proposed Vehicular and Pedestrian Access

Internal Transport Facilities

4.5.1.4 The car parking and loading/ unloading provisions for the Proposed Development are in accordance with the relevant standards and requirements as stipulated in the HKPSG. Totals of 112 nos. of car parking spaces and one motorcycle parking space will be provided within the development in accordance with the requirements by HKPSG. Also, totals of 4 goods vehicle bays will be provided with one bay located near each residential block.

4.6 Implementation Schedule

4.6.1.1 The Proposed Development is tentatively scheduled for completion in 2034. The implementation schedule has been planned to ensure the continuous provision of education and social welfare facilities prior to the commencement of works for the Proposed Development.

5. PLANNING JUSTIFICATIONS

5.1 Align with the Planning Intention of "R(C)7" Zone

5.1.1.1 The Proposed Development remains to be low to medium-rise and low to medium-density residential development which is in line with the planning intention of "R(C)" zone as stipulated on the OZP. The Proposed Development is intended for residential development, of which 'Flat' is always permitted under Column 1 use of the "R(C)7" zone.

5.1.1.2 Additionally, the layout plan as shown in **Appendix A** is submitted in accordance with the Remarks of the Notes of the OZP. The proposed land use, form, disposition and heights of buildings, proposed GFA for various uses and facilities as supported with an Environmental Assessment and Sewerage Impact Assessment are included in this Application in **Appendices C and F**.

5.1.1.3 As demonstrated in the Environmental Assessment and Sewerage Impact Assessment, the Proposed Development is not anticipated to result in insurmountable environmental problems in terms of air quality and traffic noise with the proposed appropriate mitigation measures and shall also not result in insurmountable sewerage problems.

5.2 Proposed Scheme Incorporates the Planning and Design Merits in Response to the TPB's Previous Comments

5.2.1.1 The Proposed Scheme is carefully refined based on the Planning Permission Review (s.17 of s.16 for A/H10/97) considered on 27 June 2025 to provide (i) a feasible bus lay-by for public patronage alongside the existing pedestrian footpath and (ii) provision of a maintenance walkway.

5.2.2 Provision of a Feasible Bus Lay-by for Public Patronage and Maintenance of Existing Footpath

5.2.2.1 The feasibility study conducted under the previous s.16 application (No. A/H10/97) has identified constraints in providing a standard 3.3m-wide bus lay-by due to issues related to land ownership and future management and maintenance (M&M) of the public footpath and bus lay-by for using part of the Applicant's private lot[6]. In addition, the construction of structural forms to support the proposed 3.3m-wide bus lay-by can affect the existing 2.5m-wide existing maintenance walkway for M&M of the existing highway and slope features.

5.2.2.2 Based on the Applicant's ongoing conversations with the Transport Department (TD) and Highways Department (HyD), a bus layby of 2.75m wide is proposed factoring in the mentioned structural constraints. Efforts have been made by the Applicant to provide a technically feasible bus lay-by that considers site and land constraints. In addition, in view of the minimal pedestrian volume and to avoid reduction of the carriageway width of Pok Fu Lam Road, the existing footpath with a width of not less than 2m is proposed to be maintained for pedestrian accessibility without affecting the traffic flow thereat of Pok Fu Lam Road.

[6] TPB Paper No. 11008 For Consideration by the Town Planning Board on 27 June 2025

5.2.2.3 The Applicant has demonstrated willingness and efforts to construct a feasible bus lay-by and maintenance of footpath within its private lot. To provide a feasible bus lay-by with an associated public footpath of 2m wide, a structure is proposed on top of a portion of the maintenance walkway at +135.7mPD. The 2m-wide public footpath, the structure for the provision of the public footpath and the portion of maintenance walkway at +135.7mPD at the northern part of the Application Site (about 52.5m^2 of the Applicant's lot) is proposed to be surrendered to the Government for public passage with the future M&M responsibilities to be taken up by TD and HyD. Comments are being sought between TD / HyD on the future M&M responsibilities[7].

5.2.3 Free Access for Government Inspection with the Provision of Maintenance Walkway

5.2.3.1 Taking into account the existing highway structure H123 and slope feature no. 11SW-C/C87 which adjoins the Site, a 2.5-wide maintenance walkway is proposed at +135.7mPD to offer free access from the Site for government inspection and M&M of the existing structures.

5.2.3.2 The Applicant shall continue to manage and maintain the remaining portion of the maintenance walkway at +135.7mPD within the Lot No. RBL 136RP at its own cost.

5.2.3.3 Based on the abovementioned improvement works and ongoing liaison with the relevant Government departments, the proposed construction, management and maintenance arrangements are summarized in **Table 5.1**. The Applicant is committed to undertaking the construction of the proposed improvement works, as well as the management and maintenance of the maintenance walkway at +135.7mPD. The management and maintenance arrangements for the remaining improvement works are subject to further liaison and agreement with the relevant Government departments. The Applicant will continue to liaise with TD and HyD to finalise the detailed implementation arrangements at the detailed design stage.

Table 5.1 Proposed Construction, Management and Maintenance Matrix of the Proposed Improvement Works

	Construction	Management	Maintenance
Bus Layby	Applicant	TD	HyD
Public 2m footpath	Applicant	TD	HyD
Structure on top of a portion of the maintenance walkway	Applicant	TD	HyD
Maintenance walkway at +135.7mPD (surrendered area)	Applicant	HyD	HyD
Maintenance walkway at +135.7mPD (within lot; except surrendered area)	Applicant	Applicant	Applicant

5.3 A Justified Minor Relaxation of Plot Ratio and Building Height: Optimising Valuable Land Resources for Housing with Planning and Design Merits for Public Benefits

5.3.1.1 The minor relaxation of PR from 1.9 to 1.941 and BHR from 151mPD to 164mPD for permitted 'Flat' use at the Application Site is proposed to optimise the valuable land resources in support of the relocation of the Ebenezer School coupled with the provision of planning and design merits

[7] Based on TPB Paper No. 11008, TD has expressed no objection in principle to take up the management responsibility of the newly formed widened footpath and bus lay-by under the section 12A application, provided that (a) the area is constructed up to TD and HyD's standards; (b) the area would be surrendered to the Government; and (c) HyD would take up its maintenance responsibility.

for public benefits. To put forward the proposal, a building design that optimizes building disposition, widened building separation, buffer area from Pok Fu Lam Road, greening and public amenities for the benefit of the locality is outlined to achieve the GFA of about 12,536.5 m^2.

5.3.1.2 **Accommodating bonus plot ratio for surrender of setback area for public passage** – As discussed in section 5.2.2, to provide a feasible bus layby, a portion at the northern part of the Application Site (about 52.5m^2 of the Applicant's lot) is proposed to be surrendered to the Government for public passage with the future M&M responsibilities to be taken up by TD and HyD. In view of the above, a bonus PR of about 0.041, equivalent to a bonus GFA of about 262.5 m^2, calculated by five times the area to be surrendered to the Government, is proposed to be claimed under B(P)R 22(2) for the provision of the setback area for public passage serving the bus lay-by, geotechnical access and footpath, subject to the approval of the Building Authority at the detailed design stage. Accordingly, the proposed minor relaxation of PR from 1.9 to 1.941 is solely to accommodate the bonus PR arising from the proposed surrender and does not represent an increase in the underlying development intensity of the Application Site beyond the bonus PR.

5.3.1.3 **Minimising excavation and site formation works through a more sustainable site formation approach** – The proposed minor relaxation of BHR is partly attributable to the adoption of higher formation levels, from about 120mPD to 122mPD for Blocks T1 to T3 and 125.4mPD for Block T4, having regard to the existing site topography and to minimise extensive excavation works. The proposed formation levels would reduce the overall excavation volume by about 3,400m^3, from approximately 50,400m^3 to 47,000m^3, thereby reducing the generation of construction waste, minimising disturbance to the surrounding environment and improving construction efficiency. Accordingly, the corresponding increase in BH arising from the higher formation levels represents a prudent response to the Site's physical conditions and sustainable design considerations.

5.3.1.4 **Reflecting contemporary residential design standards and market expectations and enhancing residential wellbeing through an appropriate floor-to-floor height** – In the post-pandemic era, greater attention has been placed on indoor environmental quality, particularly ventilation and air movement within residential premises. A higher FTFH provides a greater internal volume and enhanced flexibility for the design of the internal environment and building services, while facilitating opportunities for improved air movement and natural ventilation[8][9]. This is consistent with the broader emphasis on ventilation in residential buildings arising from the COVID-19 pandemic. Accordingly, the adoption of a 3.5m FTFH would contribute to improved spatial quality and provide greater design flexibility for achieving a healthy and comfortable living environment. The proposed 3.5m FTFH is also supported by benchmarking against recent residential developments. Based on the review of record plans in BRAVO for four residential developments completed within the past 10 years within the Pok Fu Lam OZP, three developments adopt an FTFH of at least 3.5m (**Table 5.2** refers). A wider review of recent residential developments of 8 to 25 storeys also demonstrates the adoption of an FTFH of at least 3.5m in a notable proportion of developments, including about 30% of the developments reviewed in 2025 and 2026 (**Table 5.3** refers). The benchmarking therefore demonstrates that an FTFH of 3.5m is not uncommon in contemporary residential developments and is particularly well represented among the recent Pok Fu Lam developments reviewed.

[8] Benito et al., 2021. Ventilation for Residential Buildings: Critical Assessment of Standard Requirements in the COVID-19 Pandemic Context. Source: https://www.frontiersin.org/journals/built-environment/articles/10.3389/fbuil.2021.656718/full

[9] Bhagat et al., 2020. Effects of ventilation on the indoor spread of COVID-19. Source:https://pmc.ncbi.nlm.nih.gov/articles/PMC7520710/

Table 5.2 List of Developments with Floor-to-Floor Height of at least 3.5m Completed within 10 Years within the Pok Fu Lam OZP

Property Name	Completion Year
39 Bisney Road	2025
138 Pok Fu Lam Road	2022
Bisney Crest, 55-57 Bisney Road	2017

(Source: Record plans on BRAVO)

Table 5.3 List of Developments with Floor-to-Floor Height of at least 3.5m based on Available Information from Sales Brochure for Residential Developments of 8 to 25 Storeys

Property Name	Year
One Liberty	2026
Garden Regency	
Mount Broadcast	
Foto+	
Nexus Grand	2025
Park College	
Spring Garden	
House Muse	
1 South Bay Close	
Flora	
Verano	
Hava	

(Source: Various Property Developer Website)

5.3.1.5 **Accommodating site-specific constraints and essential infrastructure requirements within the Site's irregular configuration** – The proposed BHR relaxation represents a practical and site-responsive design solution to accommodate essential technical and infrastructure requirements. The Proposed Scheme has been carefully considered to include the retention of the existing 2.5m maintenance walkway for access to the highway structure supporting Pok Fu Lam Road, provision of the necessary EVA and vehicular access, 20m building separation from the Ebenezer New Hope School, achieving a minimum 20% greenery requirements in compliance to SBD Guidelines, 12 feet wide footpath around the site boundary as required under the lease, all of which impose physical constraints on the developable area and disposition of the proposed buildings. The building form and height have therefore been carefully balanced to respond to these constraints while enabling reasonable realisation of the permissible development potential under the OZP.

5.3.1.6 **Incorporating planning and design merits to address environmental and infrastructure requirements while delivering wider public benefits** – The Proposed Development has incorporated a range of planning and design measures in response to the Site's environmental, infrastructure and accessibility considerations. These include the inclusion of the 20m buffer area requirements for air quality and noise mitigation; retention of the existing maintenance walkway to maintain access to the existing highway structure and slope features; provision of the proposed bus lay-by to enhance public transport accessibility and the local commuting experience; incorporation of green wall at the E&M block to enhance the landscape amenity along Pok Fu Lam Road. These measures have collectively influenced the site planning, building disposition and developable envelope of the Proposed Development. Accordingly, the proposed minor relaxation of BHR forms part of a balanced design response that accommodates the necessary planning and technical requirements while delivering tangible planning and public benefits.

5.4 Proposed Minor Relaxation of Building Height Restriction is Compatible with the Existing and Planned Surroundings

5.4.1.1 The proposed BH of 164mPD is compatible with the surrounding medium-rise density residential or academic developments. The building heights on the opposite side of Pok Fu Lam Road ranges from about 182mPD to 227mPD. To the immediate north and northwest is an area zoned "G/IC(1)" with a BHR of 164mPD reserved for the proposed academic buildings for the Li Ka Shing Faculty of Medicine of HKU. In addition, the proposed BH would maintain the existing stepped building height profile descending towards the seaside. According to the planning assessment of PlanD in the previous s.16 application (No. A/H10/97) and the minutes of MPC meeting on 16 August 2024, "*the proposed development is not incompatible with the surrounding landscape setting*" and "*the proposed development with a minor relaxation of the BHR to 164mPD was considered not incompatible with the surrounding developments*"[10].

5.4.1.2 **Figure 5.1** shows the building height surrounding the Application Site.

5.5 Enhance the Overall Landscape and Visual Amenity

5.5.1.1 Currently, the Site frontage along Pok Fu Lam Road is predominantly defined by building structures and hard-paved elements associated with the existing development. The Proposed Development proposes a green coverage of not less than 20%. Vertical greening, in the form of a green wall is proposed at the E/M block fronting Pok Fu Lam Road to enhance the visual interest and appeal of the Proposed Development along the Pok Fu Lam Road.

5.5.1.2 As mentioned in **Section 4.4**, the existing Site which is currently occupied by building structures of the Ebenezer School are mostly hard paved. The Proposed Development introduces opportunities to uplift the roadside and greening amenities within the Site through appropriate landscape treatment, such as to complement the interspersed stretches of natural vegetated slopes surrounding the Site.

5.6 Generating NO Insurmountable Impacts to the Surrounding Area

5.6.1.1 Various technical assessments have been carried out to ascertain the feasibility of the Proposed development. These include **Appendix B** – Traffic Impact Assessment, **Appendix C** – Environmental Assessment, **Appendix D** – Air Ventilation Assessment (Expert Evaluation), **Appendix E** – Sewerage Impact Assessment, **Appendix F** – Drainage Impact Assessment, **Appendix G** – Geotechnical Planning Review Report; **Appendix H** – Tree Preservation Proposal; **Appendix I** – Landscape Master Plan; and **Appendix J** – Visual Impact Assessment.

5.6.1.2 The findings of the technical assessments confirm that the Proposed Development is technically feasible and will neither generate nor be susceptible to insurmountable impacts on the Application Site or the surrounding environment, provided that appropriate mitigation measures and improvement works are implemented.

[10] Minutes of the 1338th Town Planning Board Meeting

6. CONCLUSION

6.1.1.1 This Supporting Planning Statement is submitted to the TPB on behalf of the Applicant, the Ebenezer School and Home for the Visually Impaired Limited, under s.16 of TPO to seek approval for Submission of Layout Plan and Proposed Minor Relaxation of Plot Ratio and Building Height Restriction for Permitted Flat at "Residential (Group C)7" zone at the Ebenezer School and Home for the Visually Impaired, 131 Pok Fu Lam Road, Pok Fu Lam, Hong Kong.

6.1.1.2 As required under the Notes of the OZP, the layout plan is submitted with the proposed land use, form, disposition and heights of buildings, proposed GFA for various uses and facilities included and supported with an Environmental Assessment and Sewerage Impact Assessment.

6.1.1.3 Additionally, the Proposed Development seeks approval from the TPB for minor relaxation of PR from 1.9 to 1.941 and BHR from 151mPD to 164mPD for permitted 'Flat' use. It also demonstrates planning merits through the provision of a bus layby to support public transportation access and improve local commute experience, maintaining existing footpaths to ensure public accessibility, and the optimization of the Site for housing provision, while maintaining compatibility with the surrounding residential developments in the Pok Fu Lam area. Various planning and design principles have been considered in formulating the Proposed Scheme. They include providing planning merits for the benefit of the community, akin to the previous "G/IC" zone of the Site; facilitating the continuous provision of education and social welfare facilities for the visually impaired; optimizing the Site for housing provision while ensuring development compatibility; and to also refine the Proposed Scheme based on the TPB's comments on the previous s.16 application. With reference to the various technical assessments conducted on the Application Site, no significant adverse impacts to the surroundings are anticipated. Approval of this s.16 application shall not set an undesirable precedent in the Pok Fu Lam area.

6.1.1.4 The Proposed Development is fully justified with planning and design merits, including the provision of a feasible bus lay-by and maintenance of existing footpaths along Pok Fu Lam Road for dedicated public patronage; provision of free access from the Site to the proposed maintenance walkway for government inspection of existing highway and slope structures; provision of vertical and horizontal greening as roadside or greening amenity; and putting forward meticulous consideration of site formation levels to reduce excavation extents. Traffic impact assessment is also included to demonstrate that the Proposed Development would not generate adverse traffic impact to the Pok Fu Lam Road.

6.1.1.5 Taking into account the merits and justifications presented in this Supporting Planning Statement, we sincerely seek favourable consideration from the TPB to support this s.16 application.

Figures

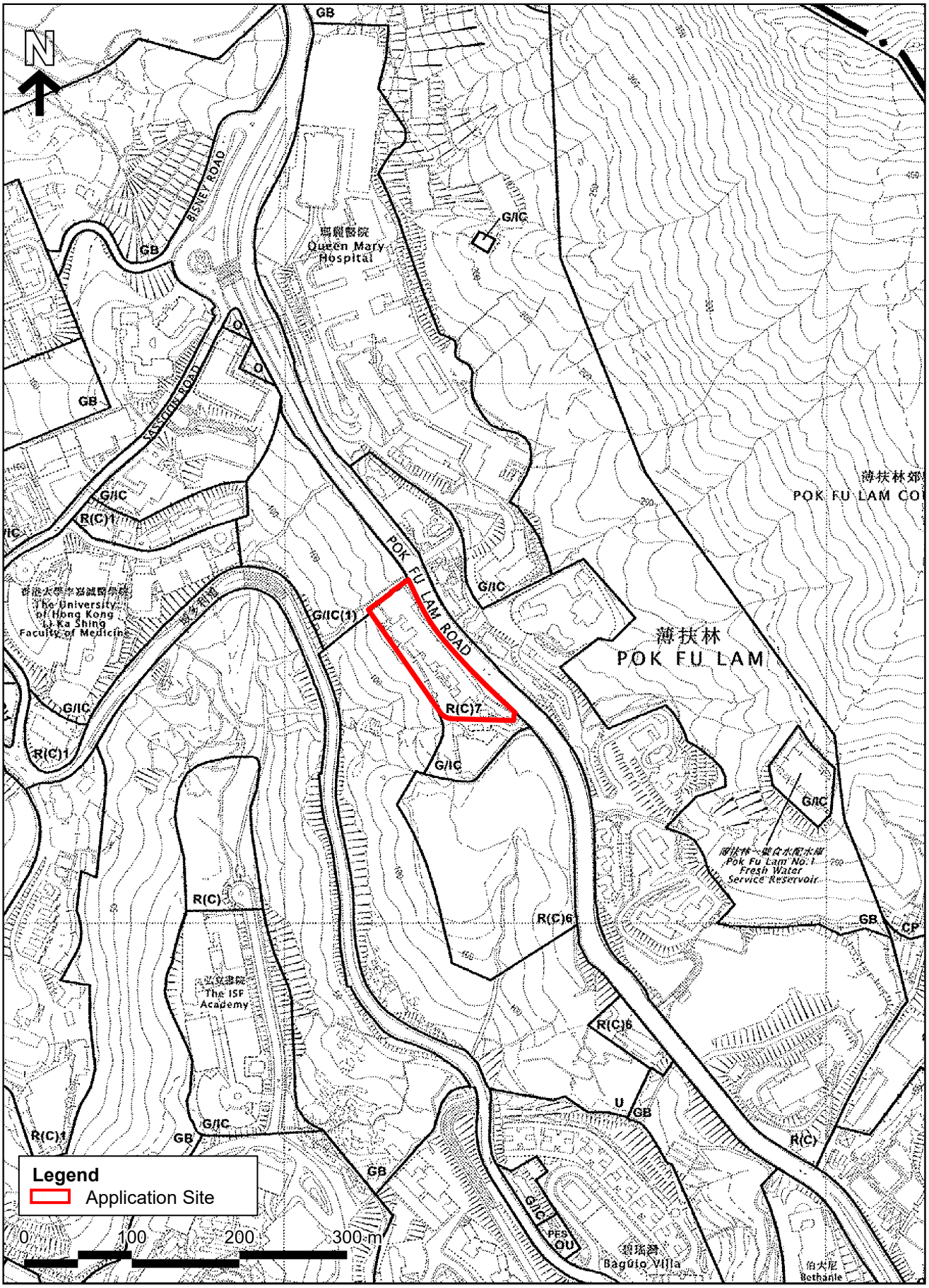


Figure No.	Scale	Figure Title	
2.1	As Shown		Location Plan of Application Site
ARUP	Date	Source	
	February 2026		Town Planning Board Statutory Planning Portal 3 (Generated on ArcGIS Pro)



Figure No.	Scale	Figure Title	
2.2	As Shown		Lot Index Plan of the Application Site
ARUP	Date	Source	
	February 2026		Lands Department, 2026

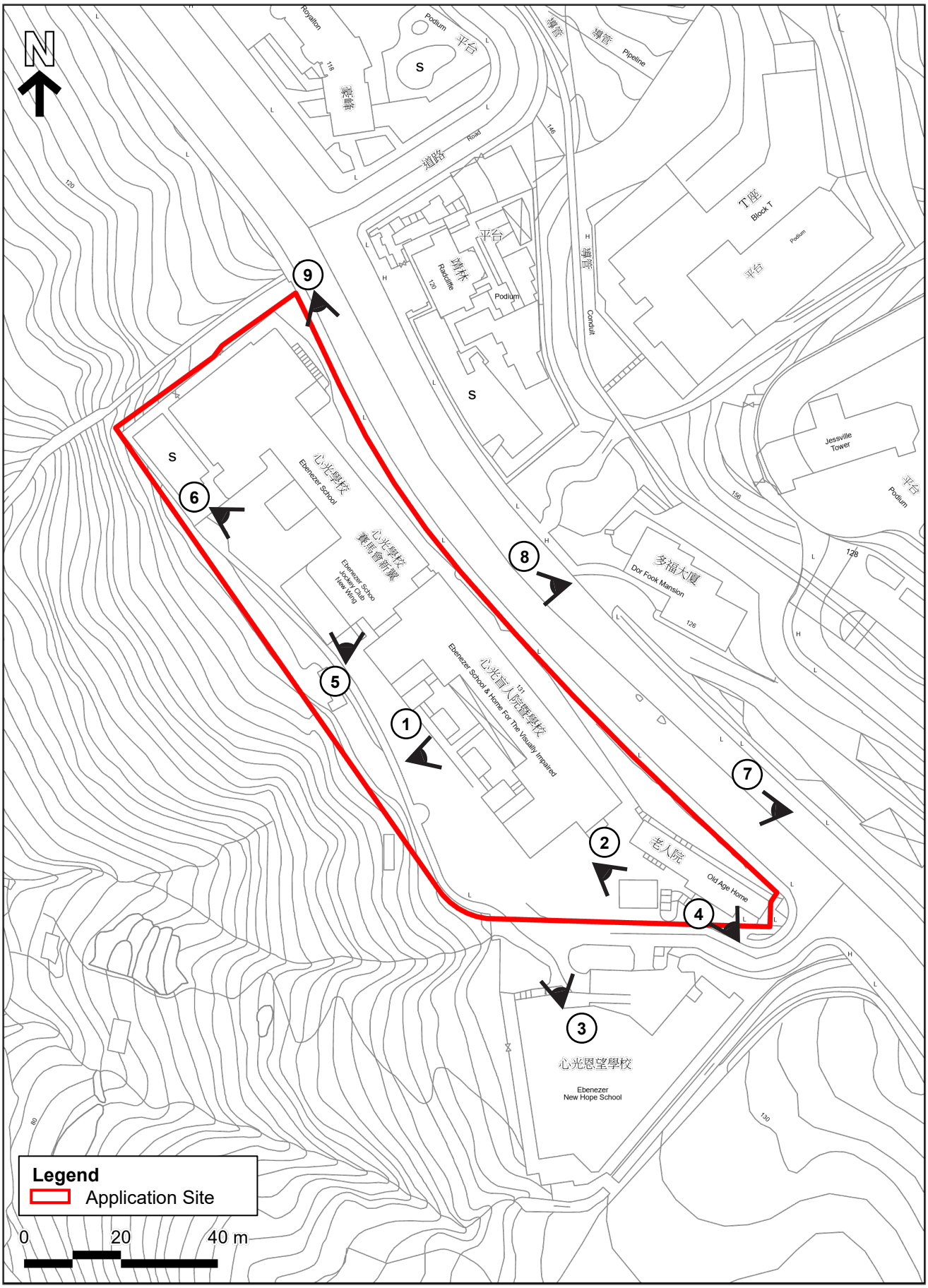


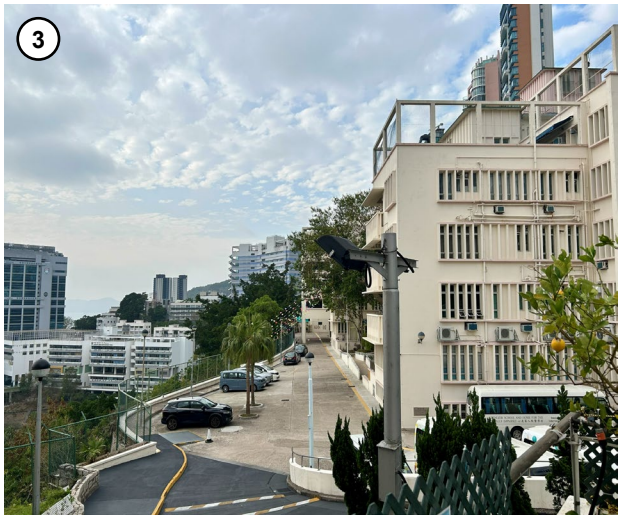
Figure No.	Scale	Figure Title	
2.3a	As Shown		Existing Condition of the Application Site (1 of 3)
ARUP	Date	Source	
	February 2026		Image Source: Site Photos Taken in February 2026



View Towards Ebenezer School & Home for the Visually Impaired



View Towards the Old Age Home and Single-Storey Carport



View from the Ebenezer New Hope School Towards the Ebenezer School and Home for the Visually Impaired



View Towards Old Age Home



View Towards the New Ebenezer School Jockey Club New Wing

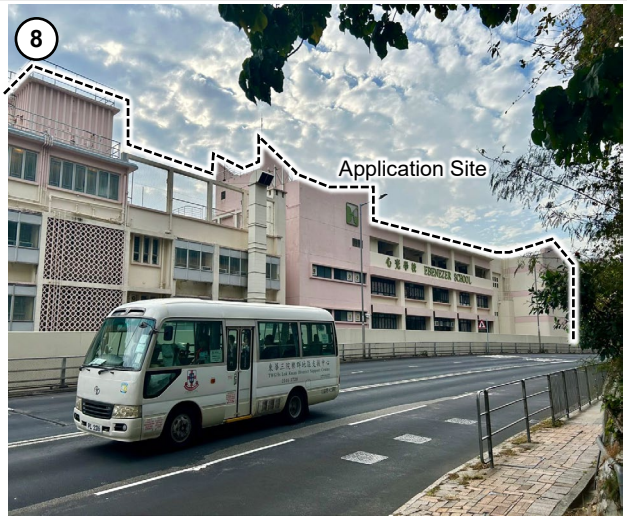


View towards the Ebenezer School and New Ebenezer School Jockey Club New Wing

Figure No.	*Scale*	*Figure Title*	**Existing Condition of the Application Site** (2 of 3)
2.3b	-		
ARUP	*Date* February 2026	*Source*	Image Source: Site Photos Taken in February 2026



View of the Application Site from South-East Direction from Pok Fu Lam Road

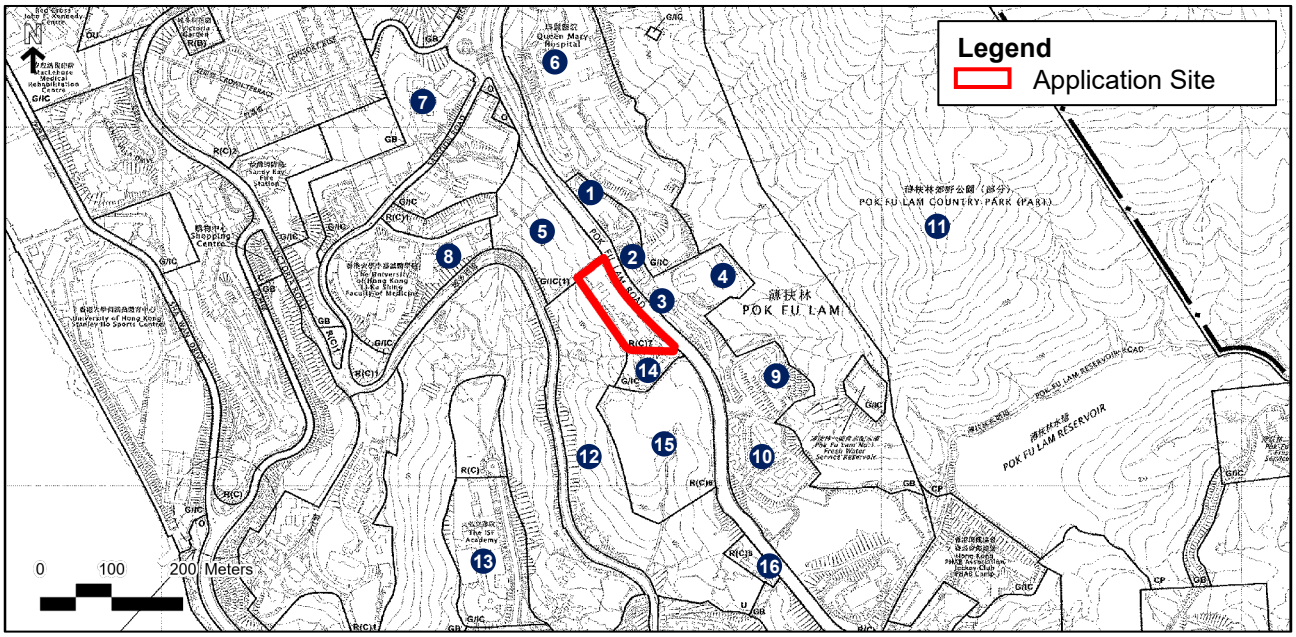


View of the Application Site from South-East Direction from Pok Fu Lam Road



View of the Application Site from North-West Direction from Pok Fu Lam Road

Figure No.	*Scale*	*Figure Title*	Existing Condition of the Application Site (3 of 3)
2.3c	-		
ARUP	*Date* February 2026	*Source*	Image Source: Site Photos Taken in February 2026





Royalton and Royalton II
(216mPD)



Radcliffe
(216mPD)

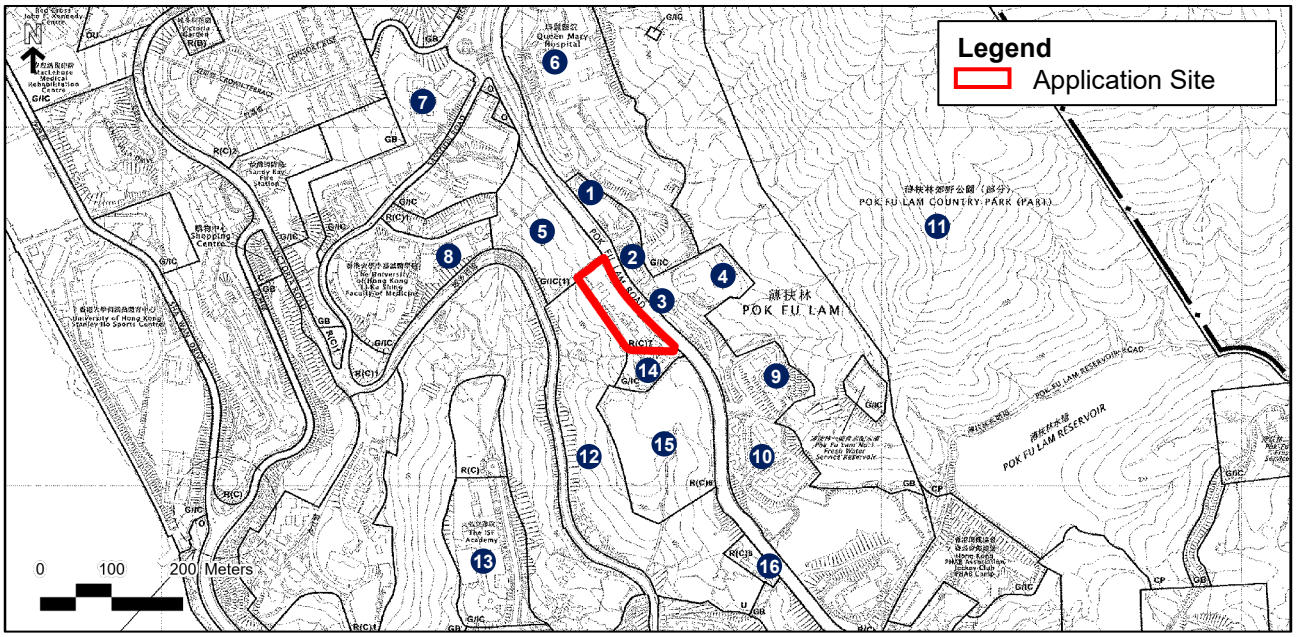


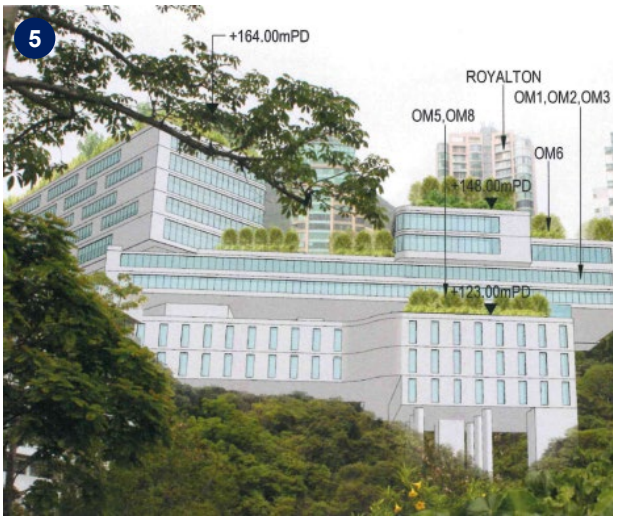
Dor Fook Mansion
(182mPD)



Jessville Tower
(227mPD)

Figure No.	Scale	Figure Title	
2.4a	-		Surrounding Context of the Application Site (1 of 4)
ARUP	Date	Source	
	February 2026		Image Source: Site Photos Taken in February 2026





HKU's Faculty of Medicine Campus Expansion (max. 164mPD)
Source: MPC Paper No. Y/H10/13A, 2021



Queen Mary Hospital (177mPD to 231mPD)
Source: Google Maps, 2026

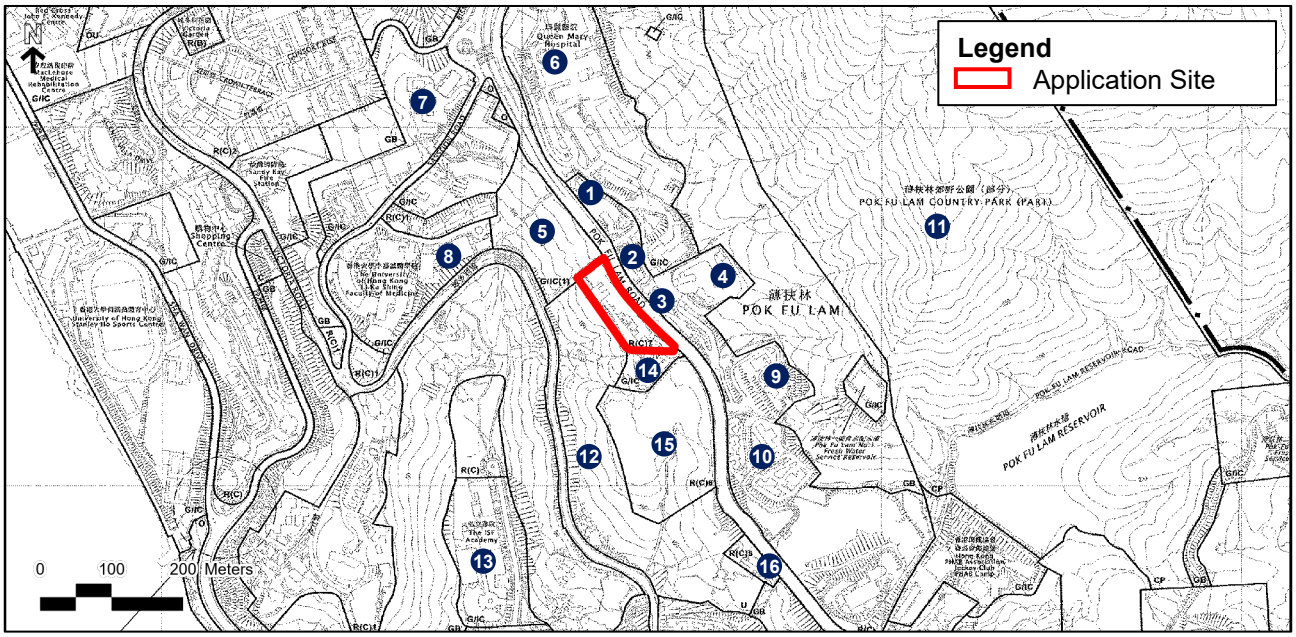


HKU Staff / Student Accommodations (187mPD)
Source: Google Maps, 2026



Caritas Wu Cheng-chung Secondary School (115mPD)
Source: Google Earth, 2026

Figure No.	*Scale*	*Figure Title*	Surrounding Context of the Application Site (2 of 4)
2.4b	-		
ARUP	*Date* February 2026	*Source*	Image Source: Google Earth, 2026; Google Maps, 2026; and MPC Paper No. Y/H10/13A, 2021





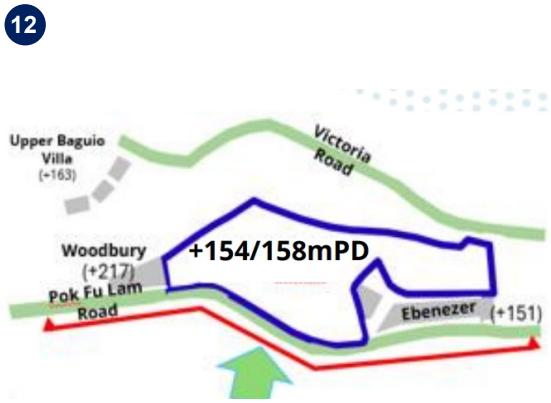
Alberose
(189mPD)



Middleton Towers
(201mPD to 203mPD)

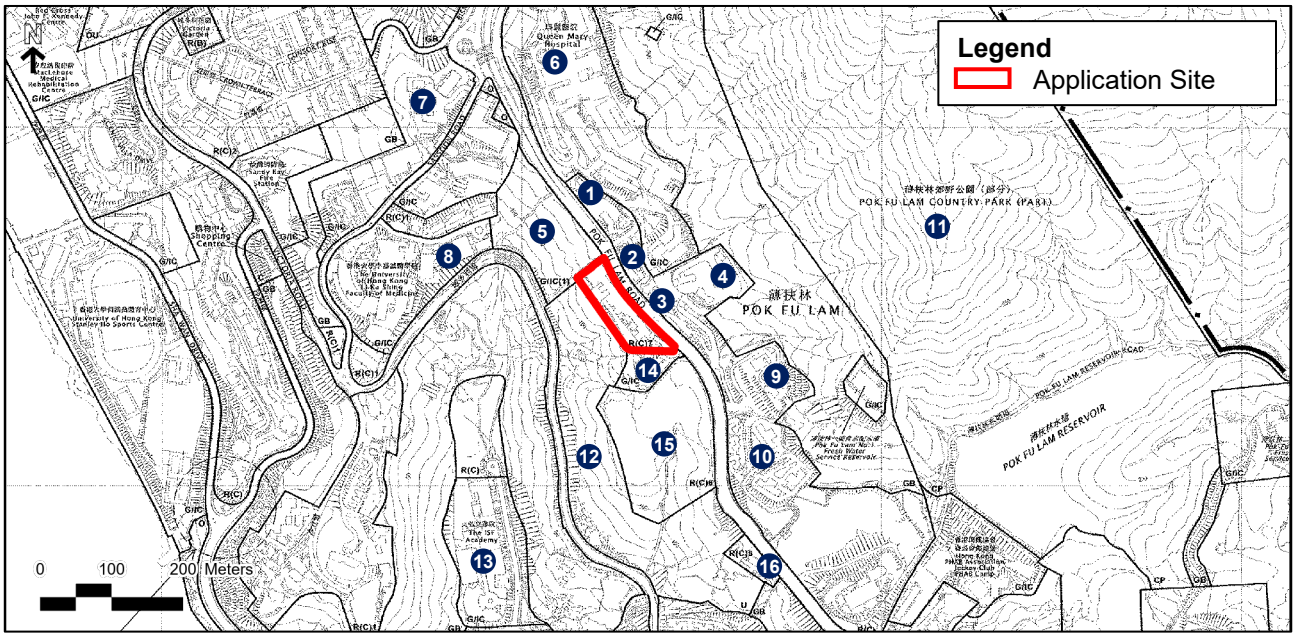


Pok Fu Lam Country Park
Source: Agriculture, Fisheries and Conservation Department (AFCD)



Global Innovation Centre
(under "Undetermined" zone) (Proposed BH 154mPD to 158mPD)
Source: Southern District Council (January 2026)

Figure No.	*Scale*	*Figure Title*	Surrounding Context of the Application Site (3 of 4)
2.4c	-		
ARUP	*Date* February 2026	*Source*	Image Source: Site Photos Taken in February 2026; AFCD; & Southern District Council

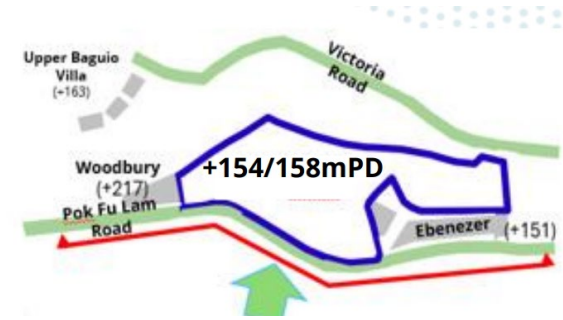




Independent Schools Foundation Academy (189mPD)



Ebenezer New Hope School (141mPD)



Vacant Government Land which is part of the new proposed site for the Global Innovation Centre zoned "R(C)6" (Proposed building height 154mPD to 158mPD)



Woodbury Court (218mPD)

Figure No.	Scale	Figure Title
2.4d	-	Surrounding Context of the Application Site (4 of 4)
ARUP	Date: February 2026	Source: Image Source: Site Photos Taken in February 2026

RESIDENTIAL (GROUP C)

Column 1 Uses always permitted	Column 2 Uses that may be permitted with or without conditions on application to the Town Planning Board
Flat Government Use (Police Reporting Centre, Post Office only) House Utility Installation for Private Project	Ambulance Depot Eating Place Educational Institution Government Refuse Collection Point Government Use (not elsewhere specified) Hospital Hotel Institutional Use (not elsewhere specified) Library Mass Transit Railway Vent Shaft and/or Other Structure above Ground Level other than Entrances Petrol Filling Station Place of Recreation, Sports or Culture Private Club Public Clinic Public Convenience Public Transport Terminus or Station Public Utility Installation Public Vehicle Park (excluding container vehicle) Recyclable Collection Centre Religious Institution Residential Institution School Shop and Services Social Welfare Facility Training Centre

Planning Intention

This zone is intended primarily for low to medium-rise and low to medium-density residential developments where commercial uses serving the residential neighbourhood may be permitted on application to the Town Planning Board.

(Please see next page)

Figure No.	*Scale*	*Figure Title*	Extracted Note of the "R(C)7" Zone attached to the OZP (1 of 4)
3.1a	-		
ARUP	*Date*	*Source*	Approved Pok Fu Lam Outline Zoning Plan No. S/H10/23
	February 2026		

RESIDENTIAL (GROUP C) (cont'd)

Remarks

(1) For "R(C)" zone and all sub-areas in "R(C)" zone, except sub-area "R(C)7", no new development, or addition, alteration and/or modification to or redevelopment of an existing building shall result in a total development and/or redevelopment in excess of the maximum building height, plot ratio and site coverage specified below:

(a) the maximum height of any building within each sub-area of the zone shall be limited to that specified below or the height of the existing building, whichever is the greater :

Sub-area	Restrictions
R(C)1	Maximum 3 storeys including carports and maximum building height of 10.67m.
R(C)2	Maximum 3 storeys (including roof-top structures except such structure as is necessary for the provision of a lift machine room, water tank and stairhood) above 1 storey of carports and maximum building height of 17.22m (including roof-top structures) measured from the existing mean formation level of the existing lot(s) or building(s).
R(C)3	Maximum 3 storeys including carports.
R(C)4	Maximum 6 storeys in addition to 1 storey of carports.
R(C)6	Maximum 12 storeys in addition to 1 storey of carports and maximum building height of 137 metres above Principal Datum.

(Please see next page)

Figure No.	Scale	Figure Title	Extracted Note of the "R(C)7" Zone attached to the OZP (2 of 4)
3.1b	-		
ARUP	Date: February 2026	Source	Approved Pok Fu Lam Outline Zoning Plan No. S/H10/23

RESIDENTIAL (GROUP C) (cont'd)

Remarks (cont'd)

(b) the maximum plot ratio and site coverage shall be limited to that specified in the following table or the plot ratio and site coverage of the existing building, whichever is the greater :

Height - No. of Storeys Used for Domestic Purposes	Maximum Plot Ratio	Maximum Site Coverage (%)
2 and below	0.60	30
3	0.75	25
4	0.90	22.5
5	1.00	20
6	1.20	20
7	1.40	20
8	1.40	17.5
9	1.58	17.5
10	1.75	17.5
11	1.93	17.5
12	2.10	17.5
13	1.95	15
14	2.10	15
15	2.25	15
16	2.40	15
17	2.55	15
18	2.70	15
19	2.85	15
20 or more	3.00	15

(2) For sub-area "R(C)7", no new development, or addition, alteration and/or modification to or redevelopment of an existing building shall result in a total development and/or redevelopment in excess of a maximum plot ratio of 1.9 and a maximum building height of 151 metres above Principal Datum, or the plot ratio and height of existing building, whichever is the greater.

(3) For any new development or redevelopment of an existing building at sub-area "R(C)7", a layout plan shall be submitted for the approval of the Town Planning Board. The layout plan should include the following information:

(i) the proposed land use(s), and the form, disposition and heights of all buildings (including structures) to be erected on the site;

(ii) the proposed total gross floor area for various uses and facilities;

(Please see next page)

Figure No.	*Scale*	*Figure Title*	Extracted Note of the "R(C)7" Zone attached to the OZP (3 of 4)
3.1c	-		
ARUP	*Date* February 2026	*Source*	Approved Pok Fu Lam Outline Zoning Plan No. S/H10/23

RESIDENTIAL (GROUP C) (cont'd)

Remarks (cont'd)

(iii) an environmental assessment report to examine any possible environmental problems in terms of air quality and traffic noise that may be caused to the proposed development and the proposed mitigation measures to tackle them;

(iv) a sewerage impact assessment report to examine any sewerage problem that may be caused by the proposed development and the proposed mitigation measures to tackle them; and

(v) such other information as may be required by the Town Planning Board.

(4) For "R(C)" zone and all sub-areas in "R(C)" zone, except sub-area "R(C)2", in determining the maximum plot ratio and site coverage for the purposes of paragraph (1) above, any floor space that is constructed or intended for use solely as car park, loading/unloading bay, plant room and caretaker's office, or caretaker's quarters and recreational facilities for the use and benefit of all the owners or occupiers of the domestic building or domestic part of the building, provided such uses and facilities are ancillary and directly related to the development or redevelopment, may be disregarded.

(5) For sub-area "R(C)2", in determining the maximum plot ratio and site coverage for the purposes of paragraph (1) above, any floor space that is constructed or intended for use solely as car park, loading/unloading bay, plant room and caretaker's office, or caretaker's quarters and recreational facilities for the use and benefit of all the owners or occupiers of the domestic building or domestic part of the building, shall be included for calculations, although they may be excluded upon application to the Town Planning Board under section 16 of the Town Planning Ordinance.

(6) Based on the individual merits of a development or redevelopment proposal, minor relaxation of the plot ratio, site coverage and building height restrictions as stated in paragraphs (1) and (2) above may be considered by the Town Planning Board on application under section 16 of the Town Planning Ordinance.

Figure No.	*Scale*	*Figure Title*	Extracted Note of the "R(C)7" Zone attached to the OZP (4 of 4)
3.1d	-		
ARUP	*Date* February 2026	*Source*	Approved Pok Fu Lam Outline Zoning Plan No. S/H10/23

of variations in height and building form within individual sites to reduce the visual scale. The stepped building height concept shall also be taken into account in the redevelopment of Wah Fu Estate.

7.2.6 An Expert Evaluation on Air Ventilation Assessment (AVA EE) has been carried out for the proposed public housing developments. Six local air paths with minimum width of 20 to 30m and suitable block disposition and podium design have been adopted to alleviate the potential air ventilation impacts. A quantitative AVA should be carried out by HD at the detailed design stage for scheme optimisation. The AVA EE also recommends guiding principles, in the form of local air paths, for the future AVA to be conducted for the redevelopment of Wah Fu Estate.

7.2.7 For the redevelopment of Wah Fu Estate, in accordance with the established administrative procedure, it will be guided by a planning brief. Also HD would undertake relevant technical assessments including traffic impact assessment, environmental assessment, visual impact assessment and AVA, etc. to demonstrate its feasibility.

7.3 Residential (Group B) ("R(B)"): Total Area 12.46 ha

7.3.1 This zone is intended primarily for medium-density residential developments where commercial uses serving the residential neighbourhood may be permitted on application to the Board.

7.3.2 Land zoned for this purpose is mainly located in the southern portion of the Area. Examples of some major existing residential developments include the Chi Fu Fa Yuen and Pok Fu Lam Gardens. Future development includes a site east of Chi Fu Fa Yuen.

7.3.3 In order to control the building volume, preserve the present characteristics of the area and avoid over-development, appropriate residential density schedule (plot ratio and site coverage restrictions) for Residential Zone 2 are included in the Notes of the Plan. To allow greater flexibility, minor relaxation of these restrictions based on individual merits, including design justifications, positive landscape and planning gains, may be considered by the Board on application.

7.4 Residential (Group C) ("R(C)"): Total Area 45.34 ha

7.4.1 This zone is intended primarily for low to medium-rise and low to medium-density residential developments where commercial uses serving the residential neighbourhood may be permitted on application to the Board.

7.4.2 This zoning covers sites mostly in the northern and central portion of the Area. In view of the limited road capacity, steep topography, the need to preserve public view/amenity and character of the area, as well as the need to control over-development, this zoning is subject to site

Figure No.	*Scale*	*Figure Title*	Extracted Explanatory Statement of "R(C)7" attached to the OZP (1 of 2)
3.1e	-		
ARUP	*Date* February 2026	*Source*	Approved Pok Fu Lam Outline Zoning Plan No. S/H10/23

coverage and plot ratio controls of Residential Zone 3 and different building height controls are also imposed for respective Special Control Areas according to individual site characteristics and surrounding environment. These restrictions are shown in the Notes attached to the Plan.

7.4.3 For the "R(C)7" site, future development is restricted to a maximum plot ratio of 1.9 and a maximum building height of 151mPD. For any new development or redevelopment of an existing building, a layout plan should be submitted to the Board for approval to address concerns on environmental aspects. The layout plan submission should set out the proposed land use(s), and the form and disposition of all buildings, and provide relevant technical assessments to ensure the air quality, traffic noise and sewerage issues could be properly addressed. The plot ratio control under "R(C)7" zone is regarded as being stipulated in a "new or amended statutory plan" according to the Joint Practice Note No. 4 "Development Control Parameters Plot Ratio/Gross Floor Area", and shall be subject to the streamlining arrangements stated therein.

7.4.4 Minor relaxation of the restrictions stated in the Notes, based on individual merits, may be considered by the Board upon application under section 16 of the Ordinance. The purpose of this provision is to allow the Board to consider proposals for building layout and design which, while not strictly complying with the stated restrictions, meet the planning objectives. It is intended to encourage imaginative designs which are adapted to the characteristics of particular sites, and overcome the need for stilting or allow for conservation of environmentally important natural features or mature vegetation. Each proposal will be considered strictly on its own merits.

7.5 Village Type Development ("V"): Total Area 2.62 ha

7.5.1 The planning intention of this zone is primarily for the provision of land for the retention of existing villages. Selected commercial and community uses serving the needs of the villagers are always permitted on the ground floor of a house. Other commercial, community and recreational uses may be permitted on application to the Board.

7.5.2 The existing Pok Fu Lam Village is under this zoning. The environment of the area is not entirely satisfactory. Improvement works for the area may be undertaken by concerned departments wherever opportunity arises. A maximum building height is also stipulated in the Notes of this zoning to reflect the existing character of the village. However, to provide flexibility for innovative design adapted to the characteristics of particular sites, minor relaxation of the building height restriction may be considered by the Board through the planning permission system. Each proposal will be considered on its individual planning merits.

Figure No.	*Scale*	*Figure Title*	Extracted Explanatory Statement of "R(C)7" attached to the OZP (2 of 2)
3.1f	-		
ARUP	*Date* February 2026	*Source*	Approved Pok Fu Lam Outline Zoning Plan No. S/H10/23

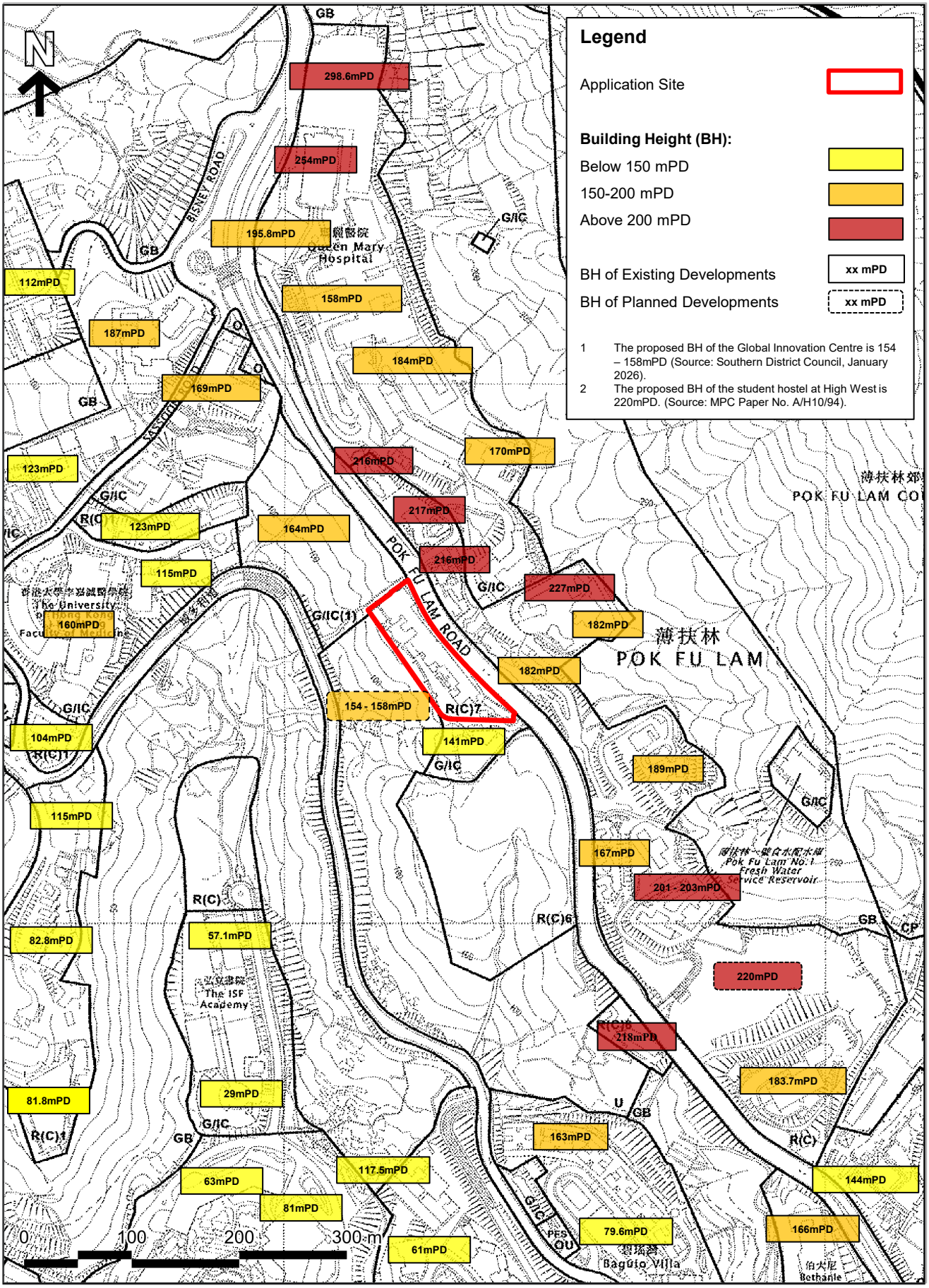


Figure No.	Scale	Figure Title	
5.1	As Shown		Surrounding Building Height of the Application Site
ARUP	Date	Source	
	February 2026		Open 3D Map by Lands Department; Southern District Council; MPC Paper No. A/H10/94