Attachment B

Responses to Public Comments table

S.16 Planning Application No. A/H10/99 - 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

Responses to Comments – Public Comments

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PUBLIC COMMENTS
Summary of Public Comments No. 1 - 153

No.	Comments	Responses
	Summary of Supporting Comments (101 nos.) (66%)	
1.	**Summary of Supporting Comments**	
	Traffic and Pedestrian Improvements	
	The proposed bus layby and footpath are improvement measures that enhance the pedestrian walking environment and eases the traffic burden along Pok Fu Lam Road.	Noted. The Applicant is committed to providing a feasible bus layby to enhance public transport accessibility and improve the local commuting experience, while maintaining the existing pedestrian footpath along Pok Fu Lam Road for continued public use and retaining a dedicated maintenance walkway to facilitate government inspection and maintenance of the existing highway and slope structures.
	Increase of Housing Provision	
	The proposed development will increase housing provision while optimising the site to deliver quality housing opportunities, including for young graduates of HKU.	Noted. The proposed development ensures the timely provision of housing units by optimising the use of the private lot, which is solely under the ownership of the Applicant.
	Compatible Proposed Building Height and Plot Ratio	
	The proposed building height which incorporates stepped building height profile is compatible along the seaside and maintains a cohesive skyline. It is also compatible with the adjacent Approved HKU facilities and remains compatible with the prevailing OZP.	Noted. The proposed BH of 164mPD is compatible with the prevailing building height context, having regard to the surrounding medium-rise residential developments with building heights ranging from about 167mPD to 227mPD, as well as the proposed BH of 164mPD for the proposed academic buildings of the Li Ka Shing Faculty of Medicine of HKU. The proposed BH would also respect and maintain the existing stepped building height profile, which generally descends towards the waterfront, thereby achieving a coherent visual relationship with the surrounding built environment.
	The proposed minor relaxation of plot ratio is justified by the provision of the proposed bus layby, and the development bulk is considered acceptable.	Noted. The proposed minor relaxation is demonstrated by the planning merits the Proposed Scheme delivers, including the proposed bus layby to support public

No.	Comments	Responses
		transportation access and improve local commute experience along Pok Fu Lam Road.
	Enhances the Character and Amenity Value of Pok Fu Lam Area	
	The proposed development enhances the character and liveability of Pok Fu Lam area, enhances the amenity and visual value with the proposed greening in contrary to the existing concrete structure.	Noted. The provision of greening enhances the roadside and visual amenity to the existing surroundings.
	Compatible with Site Surroundings	
	The proposed 20m building setback provides an adequate buffer from surrounding uses, including New Hope School and proposed HKU facilities.	Noted.
	The proposed development minimises excavation works and has minimal disturbance to the surrounding environment.	Noted.
	Summary of Objecting Comments (52 nos.) (34%)	
2.	**Summary of Objecting Comments**	
	Comments on Traffic Impacts	
	(a) The proposed development increases burden along Pok Fu Lam Road, which is already subject to capacity constraints under the Pok Fu Lam Moratorium, imposes risks to emergency responses to/from Queen Mary Hospital and is further burdened to accommodate the cumulative impacts arising from planned HKU developments in the area.	Please note that Traffic Impact Assessment has been conducted to access the potential traffic impacts. The assessment results have concluded that the Proposed Development will generate no adverse traffic impact to the surroundings with the other planned or committed developments within the study area being considered. As per the comparison of the observed trip generation by the existing Ebenezer School and the trip to be generated by the proposed development, the proposed development would generate less traffic than the existing Ebenezer School.
	(b) The limited provision of amenities in the vicinity of the proposed development would result in a high reliance on Pok Fu Lam Road for daily commuting and access to services, thereby increasing traffic demand on Pok Fu Lam Road.	Please note that Traffic Impact Assessment has been conducted to access the potential traffic impacts. The assessment results have concluded that the Proposed Development will generate no adverse traffic impact to the surroundings with the other planned or

No.	Comments	Responses
		committed developments within the study area being considered. As per the comparison of the observed trip generation by the existing Ebenezer School and the trip to be generated by the proposed development, the proposed development would generate less traffic than the existing Ebenezer School.
	Comments on Environmental Impacts	
	(a) The proposed development impacts air ventilation and results in street canyon effect.	Air Ventilation Assessment (Expert Evaluation) has been conducted to access the impacts to air ventilation. The assessments confirm that the Proposed Development will generate no adverse impact to the surroundings. Furthermore, the proposed residential tower is set back from Pok Fu Lam Road for about 20m, maintaining a separation of approximately 40m from the existing developments on the opposite side of Pok Fu Lam Road. Concerns on air ventilation and street canyon effects are not anticipated.
	(b) The traffic generated from the proposed development induces traffic noise to the surroundings.	Referring to our response in (a) above on traffic impacts, when compared to the existing condition (with Ebenezer School school in operation), there is no increase in traffic generation due to the proposed development. Therefore, no adverse traffic noise impact arising from increased road traffic is anticipated.
	(c) The proposed development disrupts ecological impacts to the surrounding green belts.	The Application Site does not adjoin any green belt. The nearest green belt area is located to the east of Pok Fu Lam Road and measures from about 60m from the nearest boundary of the Application Site. The Proposed Development involves the redevelopment of the existing Ebenezer School site for residential use, which is not pollution-intensive in nature and is not expected to cause significant disturbance to the surrounding environment during operation. Having regard to the separation from the nearby "Green Belt" area and the nature of the proposed use, no significant adverse ecological impact on the nearby "Green Belt" area is anticipated.

No.	Comments	Responses
	Comments on Geotechnical Impacts	
	(a) The proposed excavation works raise concerns over earth movement hazards and structural stability due to the site's location on a landslide-prone hillside.	Appropriate excavation sequencing, temporary support, surface and groundwater control, precautionary measures and monitoring requirements shall be developed and implemented to ensure the stability of the slope and surrounding structures throughout the works during the detailed design stage. The Applicant will submit relevant assessments and design details as appropriate to the appropriate authorities for review and comment before commencement of the excavation works.
	Summary of Planning Impacts	
	(a) The proposed development of proposed 164mPD disregards the planning precedent established by the previously rejected applications and and may set an undesirable precedent. The proposed building height should also adhere to the Explanatory Statement that developments on the seaward side along the section of Pok Fu Lam Road shall be kept below the level of Pok Fu Lam Road.	The proposed BH of 164mPD is compatible with the prevailing building height context, having regard to the surrounding medium-rise residential developments with building heights ranging from about 167mPD to 227mPD, as well as the proposed BH of 164mPD for the proposed academic buildings of the Li Ka Shing Faculty of Medicine of HKU. The proposed BH would also respect and maintain the existing stepped building height profile, which generally descends towards the waterfront, thereby achieving a coherent visual relationship with the surrounding built environment.
	(b) The proposed building height would obstruct key sightlines and is incompatible with the surrounding height profile. It should maintain a maximum building height of 151mPD, with residential unit numbers and parking provision restricted in a manner similar to Jesseville.	Our response to item (a) regarding the compatibility of the proposed BH of 164mPD with the surrounding existing and planned developments applies. The proposed number of residential units and parking spaces shall accord with the Proposed Scheme upon seeking approval from relevant government departments.
	(c) The proposed 3.5m floor-to-floor height suggests a luxury residential development.	The minor relaxation of 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

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		with the provision of planning and design merits for public benefits. The proposed relaxation is necessitated by a combination of site formation, contemporary residential design and technical requirements. In particular, the formation level of the proposed residential development has been raised from about 120mPD to 122mPD for Blocks T1 to T3 and to 125.4mPD for Block T4 to accommodate the site and engineering requirements, minimizing extensive excavation works required. In particular, the domestic floor-to-floor height (FTFH) has been increased from 3.15m to 3.5m to reflect contemporary residential design standards and market expectations, with reference to comparable residential developments in Pok Fu Lam completed within the past 10 years and the prevailing FTFH of new residential developments of 8 to 25 storeys in Hong Kong. The enhanced FTFH would also allow greater flexibility for building services and internal environmental design, contributing to improved spatial quality and residents' wellbeing.
	(d) Rooftop structures further increase the proposed building height beyond the proposed 164mPD.	The roof-top structures may be required to house mandatory/essential plant rooms that is ancillary to the residential development which will be determined in the detailed design stage. Nonetheless, the roof-top ancillary structure will be controlled within the limit of 10% of the proposed building height, in accordance with relevant guidelines.
	(e) The proposed plot ratio increase is unjustified as the proposed bus layby is a mandatory requirement rather than a planning gain.	The proposed minor relaxation of plot ratio is solely due to the proposed bonus plot ratio to be claimed for the provision of setback area for the purpose of public passage to be surrendered to the Government under the Building (Planning) Regulations 22(2) with the future M&M responsibilities to be taken up by TD and HyD.

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	(f) The proposed development intensity is considered incompatible for the planning intention of the "Residential (Group C)" zone, which is intended for low-density residential development.	The proposed minor relaxation of the plot ratio is solely to incorporate the bonus plot ratio to be claimed for the provision of setback area for the purpose of public passage to facilitate the provision of a feasible bus lay-by. The building heights of existing residential developments within the "R(C)" zone range from approximately 167mPD to 227mPD. The proposed BH is considered compatible with the prevailing medium-rise residential character of the Pok Fu Lam area.
	(g) The proposed development does not offer planning benefits that justify the proposed development intensification.	Various planning benefits have been considered in formulating the Proposed Scheme. They include providing planning merits for 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. The Proposed Scheme is also justified with the provision of a feasible bus lay-by and maintenance of existing footpaths along Pok Fu Lam Road for dedicated patronage, and provision of free access to the proposed maintenance walkway for government inspection of the existing highway and slope structures. The proposed minor intensification is justified not only by the planning benefits, but also by the absence of any insurmountable adverse impacts arising from the proposed minor relaxation.
	(h) The proposed development would erase the site's historical significance and collective memory associated with its special education and social welfare facilities.	The adjoining Ebenezer New Hope School premise does not form part of the Application Site and shall continue to be operated by the Ebenezer. Nonetheless, the proposed development is to support the redevelopment and relocation of the Ebenezer School, thereby continuing the function of providing educational and social welfare facilities, consistent with the site's former "G/IC" zoning. This would continue the site's longstanding community role and reinforce the collective memory associated with its educational and welfare functions.

(Last updated 29 October 2026)