

**Proposed Minor Relaxation of Building Height Restriction
for a Permitted Residential Development
in “Residential (Group) B” and “Residential (Group C) 4” Zones
at 1 & 1A Kotewall Road and 64 Conduit Road, Mid-levels**

(Planning Application No. A/H11 /108)

Further Information No. 1

Appendix I

Revised Supporting Planning Statement

**S16 PLANNING APPLICATION
APPROVED MID-LEVELS WEST OUTLINE ZONING PLAN NO. S/H11/15**

**Proposed Minor Relaxation of Building Height Restriction
for a Permitted Residential Development
in “Residential (Group) B” and “Residential (Group C) 4” Zones
at 1 & 1A Kotewall Road and 64 Conduit Road, Mid-levels**

SUPPORTING PLANNING STATEMENT

Spetember 2026

Applicants:

**Gainlong Limited
Honour Future Limited**

Consultancy Team:

KTA Planning Limited

 S3182_PS_V01



PLANNING LIMITED
規 劃 顧 問 有 限 公 司

Executive Summary

This Application is prepared and submitted on behalf of Gainlong Limited and Honour Future Limited ("the Applicants") to seek approval of the Town Planning Board ("TPB") under Section 16 of the Town Planning Ordinance for the Proposed Minor Relaxation of Building Height Restriction for a Permitted Residential Development ("Proposed Residential Development") at 1 & 1A Kotewall Road and 64 Conduit Road, Mid-levels ("Application Site"/ the "Site"). The Application Site falls within areas zoned "Residential (Group) B" ("R(B)") and "Residential (Group C) 4" ("R(C)4") on the Approved Mid-Levels West Outline Zoning Plan No. S/H11/15 ("Approved OZP").

The 'Flat' use is a Column 1 Use that is always permitted under the subject R(B) and R(C)4 zones. The Applicants seek minor relaxation of the building height restriction from 190mPD to +220.7mPD in the R(B) zone to facilitate a sensible and efficient residential redevelopment that respects site constraints, enhances the pedestrian environment, and provides more openness to adjoining developments. While the Proposed Residential Development contains 2 residential blocks and will be developed as a single development under one set of General Building Plans, the current application covers the entire development including the portion that proposed building height would not exceed the extent Building Height Restriction.

The total area of the Application Site is about 1,674.6m². The Proposed Residential Development comprises two residential blocks, including a taller northern block ("*Tower 1*") of 31 storeys reaching not more than +220.7mPD and a lower southern block ("*Tower 2*") of 3 storeys reaching not more than +143.66mPD. This yields a total Gross Floor Area ("GFA") of about 8,373m² at a Plot Ratio ("PR") of 5, providing 46 residential units with an average unit size of about 182m².

The Proposed Composite Development is fully justified for the following main reasons:

- The Proposed Development is compatible with the surrounding medium- to high-rise residential developments. Through careful design of building height provides a sensitive height transition with adjacent buildings.
- The proposal offers a more pleasant walking environment on Kotewall Road through a 5m setback and greening, alleviating the impact of tall retaining walls and blank facades along Robinson Road and Kotewall Road.
- The Proposed Residential Development of lower southern block brings greater openness to adjoining developments by reducing the height by 12.34m compared to an OZP-compliant scheme, creating a more comfortable living environment with improved separation from neighbouring buildings like Peace Court, Imperial Court, and King's Garden.

- The design adopts a sensible approach that avoids encroaching the 20% Building Free Zone for ridgeline protection, balancing GFA distribution between the two blocks while prioritizing visual and spatial relief.
- No unacceptable visual impact is anticipated, as demonstrated by a Visual Impact Assessment assessing viewpoints from strategic locations (e.g., West Kowloon Cultural District, Lugard Road Lookout) and local open spaces (e.g., Sun Yat Sen Memorial Park, Bonham Road Rest Garden). The development is compatible with the dense urban fabric.
- The proposed minor relaxation of building height is appropriate given site constraints from historical land issues, shared access, and topography, without increasing overall development intensity.
- Technical assessments have been demonstrating feasibility without adverse impacts on traffic, visual, drainage, sewerage, noise, geotechnical and air quality on the surrounding environment.

With the justifications and merits presented above, we sincerely request the TPB to give favourable consideration to this planning application.

行政摘要

（內文如有差異，應以英文版本為準）

申請人 **Gainlong Limited** 及 **Honour Future Limited** 擬就城市規劃條例第 16 條向城市規劃委員會（「城規會」）申請批准在「住宅（乙類）」及「住宅（丙類）4」地帶放寬建築高度限制，以進行准許的住宅發展（「擬議住宅發展」）。申請地點位於西半山旭龢道 1 及 1A 號及干德道 64 號（「申請地點」／「地盤」），屬於《中西區分區計劃大綱圖編號 S/H11/15》（「獲批准大綱圖」）所劃定的「住宅（乙類）」及「住宅（丙類）4」地帶。

「分層住宅」用途於上述「住宅（乙類）」及「住宅（丙類）4」地帶內屬第一欄經常准許的用途。申請人現申請略為放寬建築物高度限制，由（「住宅（乙類）」地帶的主水平基準以上 190 米放寬至主水平基準以上 220.7 米，以提高建築效率、改善行人環境、並為毗鄰住宅提供更高空間感與開揚度的住宅重建方案。擬議住宅發展包括兩座住宅大廈，並將以單一發展項目形式進行發展，因此本申請將涵蓋整個發展項目，包括高度不會超出既定建築高度限制的擬議住宅大廈。

申請地點總面積約為 1,674.6 平方米。擬議住宅發展包括兩座住宅大廈，其中一座較高的北面大廈為 31 層，最高高度為不超過主水平基準以上 220.7 米；另一座較低的南面大廈為 3 層，最高高度為不超過主水平基準以上 143.66 米。擬議發展的總樓面面積約 8,373 平方米，地積比率為 5，共提供 46 個住宅單位，平均單位面積約 182 平方米。

此外，基於以下各點，擬議發展應被城規會採納：

- 擬議發展與周邊中至高密度住宅發展相容，建築設計考慮到周邊的樓宇高度。
- 擬議方案透過沿旭龢道設置 5 米後退及綠化，為旭龢道提供更舒適的行人環境，減輕沿路擋土牆的壓迫感。
- 擬議發展透過將南面較低的大廈高度較合規方案降低 12.34 米，為毗鄰發展帶來更大開放空間及更舒適的生活環境。
- 擬議住宅發展透過在干德道興建有蓋小巴士站，改善現有街道景觀及為候車乘客提供舒適的候車環境。
- 擬議設計避免影響山脊線的 20% 不受建築物遮擋地帶，在兩座大廈之間平衡分配總樓面面積以緩和視覺影響。
- 視覺影響評估顯示，擬議發展不會造成不可接受的視覺影響，與密集的城市環境相容。
- 考慮到土地行政問題、共享通道及地形等地盤限制，建議的輕微放寬建築高度屬合理安排，且整體發展密度並無增加（地積比率維持為 5）。
- 技術評估將證明擬議發展在交通、視覺、排水、污水、噪音、地質及空氣質素等方面均不會對周邊環境造成不良影響。

根據上述各方面的分析，我們懇請城市規劃委員會在規劃及技術方面，支持本規劃申請。

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S16 PLANNING APPLICATION
Approved Mid-Levels West OZP No. S/H11/15

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Supporting Planning Statement

1 INTRODUCTION

1.1 Purpose

1.1.1 This Planning Application is prepared and submitted on behalf of Gainlong Limited and Honour Future Limited (“the Applicants”) to seek approval from the Town Planning Board (“TPB”) under Section 16 of the Town Planning Ordinance for the Proposed Minor Relaxation of Building Height Restriction for a Permitted Residential Development (“Proposed Residential Development”) at 1 & 1A Kotewall Road and 64 Conduit Road, Mid-levels (“Application Site”/the “Site”). The Application Site falls within areas zoned “Residential (Group) B” (“R(B)”) and “Residential (Group C) 4” (“R(C)4”) on the Approved Mid-Levels West Outline Zoning Plan No. S/H11/15 (“Approved OZP”). The proposed ‘Flat’ use is a Column 1 Use that is always permitted under “R(B)” and “R(C)4” zones. This Supporting Planning Statement is to provide the TPB with necessary information to facilitate consideration of this Application.

1.1.2 The Proposed Residential Development contains 2 residential blocks and will be developed as a single development under one set of General Building Plans. As such, the current application covers the entire development including the portion that proposed building height would not exceed the extent Building Height Restriction.

1.2 Report Structure

1.2.1 Following this Introductory Section, the site and planning context will be briefly set out in Section 2. The Proposed Residential Development scheme is included in Section 3. The planning merits and justifications for the Planning Application can be found in Section 4. Section 5 concludes and summarizes this Supporting Planning Statement.

2 SITE AND PLANNING CONTEXT

2.1 Site Location and Existing Condition

2.1.1 The Application Site, with an area of about 1,674.6m², is located at 1 & 1A Kotewall Road and 64 Conduit Road at the Mid-levels. Sandwiched between Kotewall Road in the north and Conduit Road in the south. The building at Kotewall Road level (at +109.98mPD) had already been demolished, while the existing building at Conduit Road level (at +141.52mPD) is currently unoccupied.

2.1.2 Having said that the southern portion of the Site fronts onto Conduit Road, the existing formation level ties with the adjoining building (i.e. King's Garden) at about +132.6mPD).

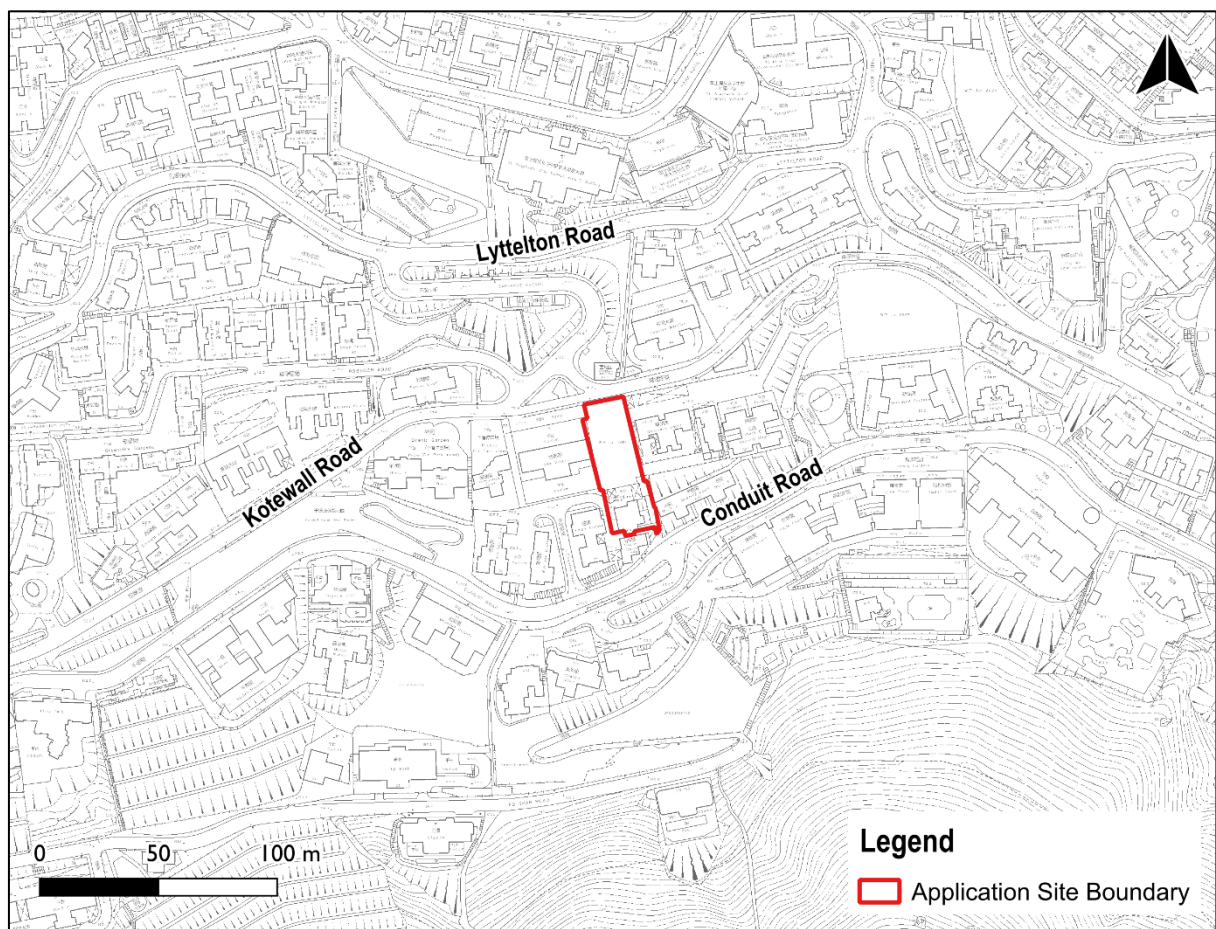


Figure 2.1 Site Location Plan

2.2 Land Lease and Ownership Status

2.2.1 The Site is registered as Inland Lot no. 946 S.B ss.1, 946 S.B ss.2, 8314, and 2387 S.A RP (**Figure 2.2** refers). The said private lot have a total area of about 1,674.6m² (subject to detailed survey of the lot boundaries). Lot nos. IL 946 S.B ss.1 and IL 946 S.B ss.2 str held under virtually unrestricted lease. **Lot IL 8314 is held under Conditions of Re-grant No. 11055, while Lot no. IL 2387 S.A RP is held under Government Lease with three lease modifications.** The Applicants own 100% of the premises and/or private lots within the Site.

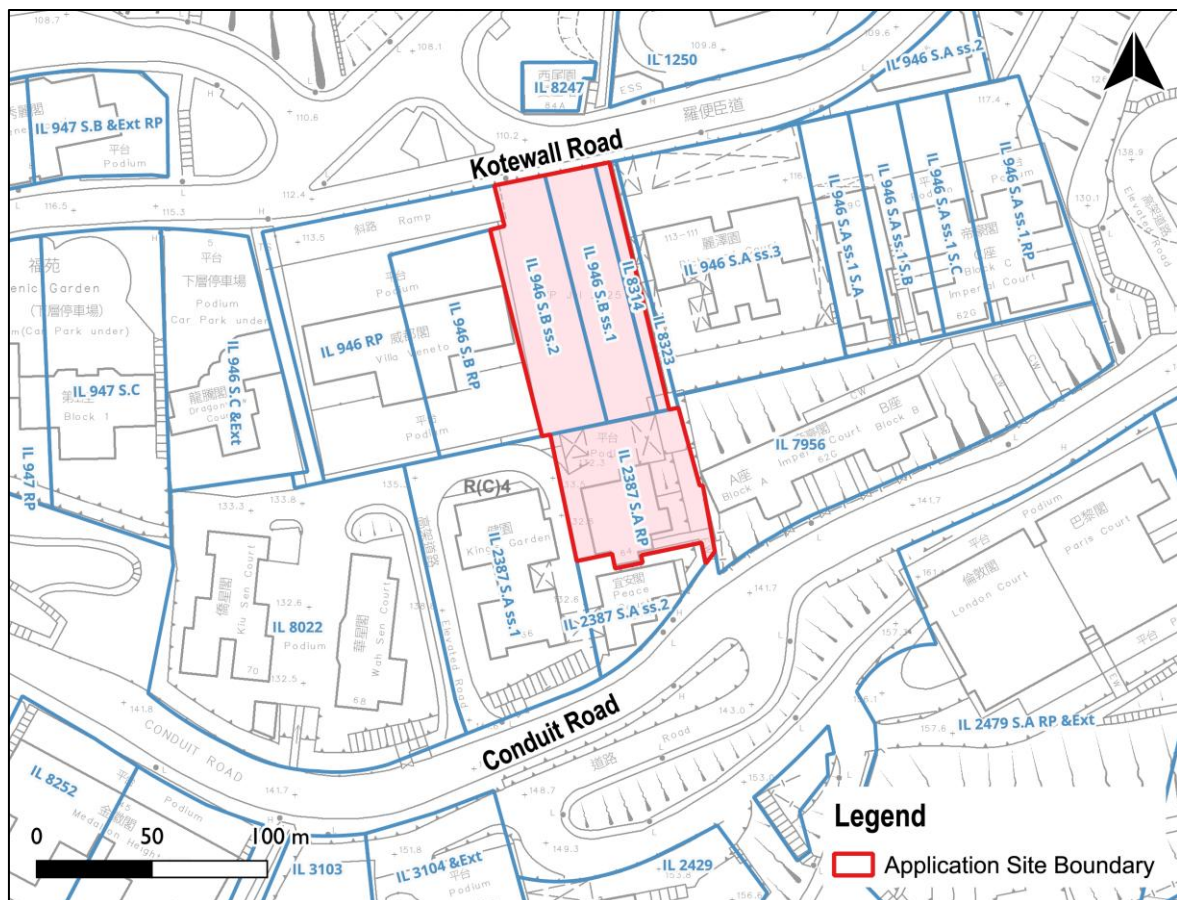


Figure 2.2 Lot Index Plan

2.3 Site Constraint

2.3.1 Vehicular access to the Application Site has been severely constrained by the historical land issues and causing logon effect on the site formation level. Vehicular access in/out the Site via Conduit Road can only be made via the right-of-way within the adjacent lots (i.e. IL 2387 s.A ss.1 and IL 8022). Notwithstanding, the existing driveway of King's Garden (i.e. IL 2387 s.A ss.1 at 66 Conduit Road) and Peace Court (i.e. IL 2387 at 64A Conduit Road) intrudes into the Application Site and is required to be maintained at all times to ensure that vehicular access to King's Garden and Peace Court will not be affected (**Figure 2.3** refers). This casts constraints over the redevelopment of 64 Conduit Road.

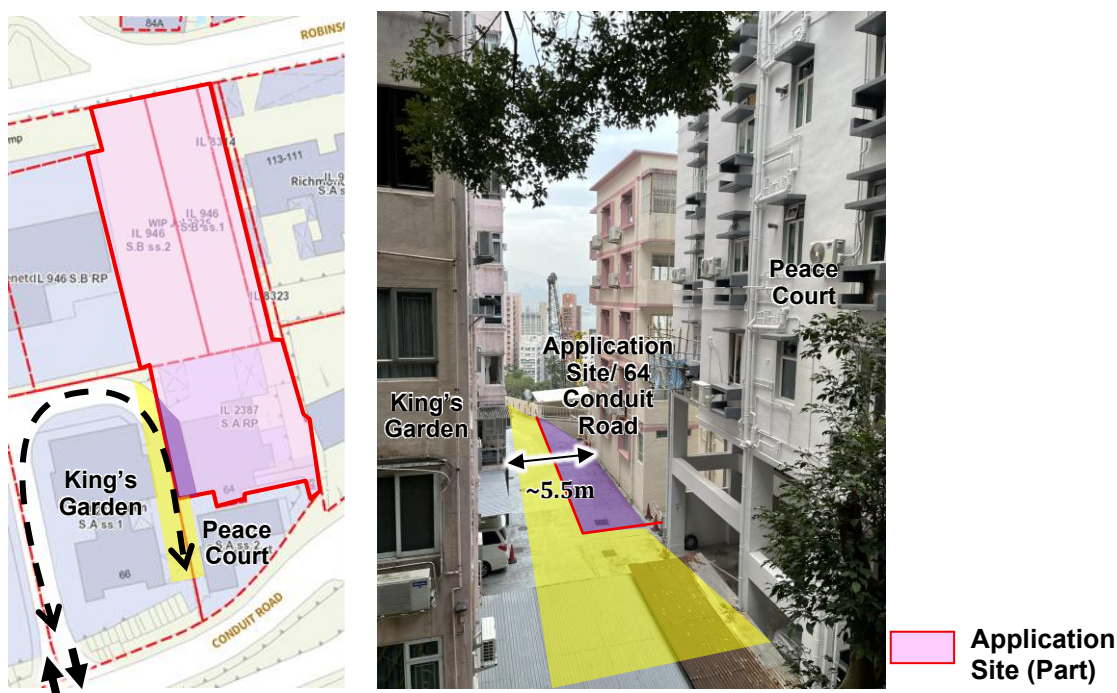


Figure 2.3 Shared Access Amongst the Adjacent Lots

2.3.2 In addition to the existing shared vehicular access, the proximity to the adjacent buildings as well as their associated retaining structures also bring development constraints to the Application Site.

2.3.3 Not least, upgrading of infrastructure would also be extremely difficult if 64 Conduit Road was to be redeveloped individually. It has a very narrow frontage onto Conduit Road and this would be the only possible connection without having to pass through any private lots. Moreover, as mentioned above, the existing formation level cannot be modified; in other words, providing separate, up-to-standard discharge points for the southern portion if redeveloped individually would be technically difficult and impractical due to the invert levels of the existing public sewer/stormwater pipes. These constraints have been carefully addressed in the Proposed Development through a coordinated single discharge point at Kotewall Road level.

2.4 Surrounding Land Use Pattern

2.4.1 The Application Site is situated in a predominantly residential area within the Mid-levels, characterized by a mix of medium- to high-rise residential developments interspersed with some low-rise luxury residences and government, institution and community facilities.

2.4.2 Existing developments nearby include:

- (a) To the immediate east of the Application Site are some medium- to high-density residential developments, namely Richmond Court (13 storeys) and Imperial Court (7 to 43 storeys). To the further east are some residential developments in similar nature and Ying Wa Girls' School;
- (b) To the immediate south is a low rise residential development namely Peace Court (4 storeys), and across Conduit Road are Haddon Court (12 storeys) and Realty Gardens (20 storeys). To the further south is Victoria Peak, which is a popular scenic view point offering panoramic views across Victoria Harbour;
- (c) To the immediate west are medium- to high- rise residential developments, namely King's Garden (8 storeys) and Villa Veneto (30 storeys), while to the further west are residential development in similar nature along Kotewall Road; and
- (d) To the north across Kotewall Road and Robinson Road is Oaklands Avenue Sitting-out Area, and to the further north are West End Park and St. Stephen's Girls College.

2.5 Accessibility

2.5.1 The Application Site enjoys good accessibility by both public transport and road networks. Kotewall Road and Conduit Road are served by a number of franchised bus routes providing frequent connections to Central, Admiralty, Causeway Bay, and other key districts on Hong Kong Island. These routes also offer convenient access to nearby MTR stations, including Sheung Wan Station and Sai Ying Pun Station.

2.6 Planning Context

Statutory Planning Context

- 2.6.1 The Application Site falls within an area zoned “Residential (Group) B” and “Residential (Group C) 4” on Approved Mid-Levels West Outline Zoning Plan No. S/H11/15 (**Figure 2.4** refers). According to the Statutory Notes of the Approved OZP, planning intention of the “R(B)” zone is “*primarily for medium-density residential developments where commercial uses serving the residential neighbourhood may be permitted on application to the Town Planning Board*”. For “R(C)4” zone, the intention is “*primarily for low-density residential developments where commercial uses serving the residential neighbourhood may be permitted on application to the Town Planning Board*”.

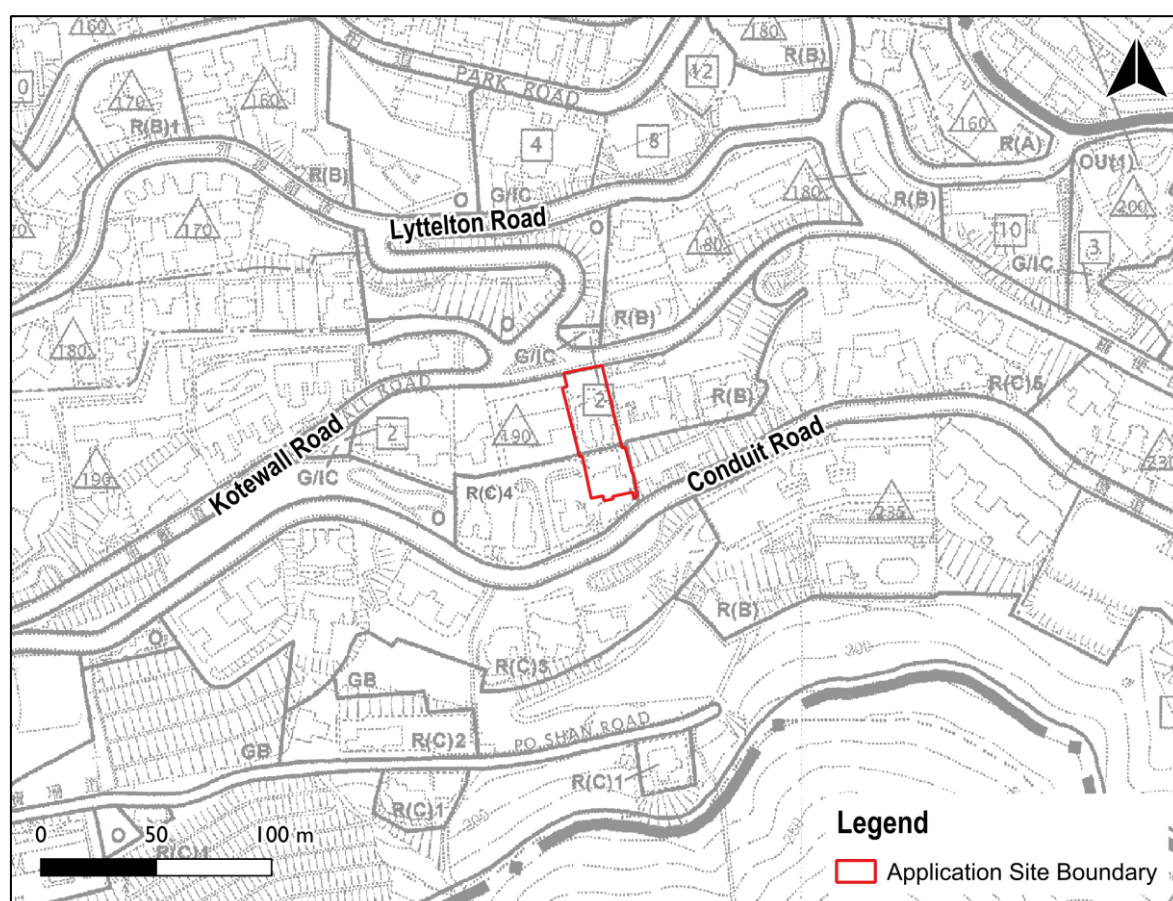


Figure 2.4 Zoning Context Plan

- 2.6.2 Under the “Remarks” section of the Statutory Notes attached to the Approved OZP, the northern portion of the Site, which is zoned “R(B)”, is subject to plot ratio and building height restrictions of 5 and 190mPD respectively. Meanwhile, the southern portion of the Site, which is zoned “R(C)4”, is subject to building height restrictions of 156mPD. It is also stated that based on the individual merits of a development or redevelopment proposal, minor relaxation of the plot ratio, GFA and building height restrictions may be considered by the Town Planning Board on application

under section 16 of the Town Planning Ordinance.

- 2.6.3 According to the Statutory Notes of the Approved OZP, the proposed 'Flat' use is a Column 1 Use that is always permitted under the subject "R(B)" and "R(C)4" zones.

Non-Statutory Planning Context

- 2.6.4 As stated in the Explanatory Statement ("ES") of the Approved OZP, in order to prevent excessively tall or out-of-context buildings, to preserve the existing views of the ridgeline and Victoria Harbour and to provide better control on the building heights of developments in the Area, building height restrictions are imposed for the "C", "R(A)", "R(B)", "R(C)6", "R(C)8", "G/IC" and "OU" zones on the Plan. The stepped building height concept recommended in the Urban Design Guidelines with lower buildings along the lower altitude and near major district open spaces has been adopted, taking into account the local area context, the local wind environment, and the need to maintain visually compatible building masses in the wider setting. In view of the topography of the Area, there are 27 height bands ranging from 115mPD to 320mPD for the "C", "R(A)", "R(B)", "R(C)6" zones – generally increasing progressively from Caine Road/Bonham Road, Kennedy Road and uphill. The proposed building height bands help preserve views to the ridgelines, achieve a stepped height profile, and maintain visual permeability and wind penetration and circulation as far as possible.

- 2.6.5 Moreover, a minor relaxation clause in respect of building height restrictions is incorporated into the Notes of the Plan in order to provide incentive for developments/redevelopments with design merits/planning gains. Each planning application will be considered on its own merits and the relevant criteria for consideration of such application are as follows:

- (a) amalgamating smaller sites for achieving better urban design and local area improvements;
- (b) accommodating the bonus plot ratio granted under the Buildings Ordinance in relation to surrender/dedication of land/area for use as a public passage/street widening;
- (c) providing better streetscape/good quality street level public urban space;
- (d) providing separation between buildings to enhance air and visual permeability; and
- (e) other factors such as site constraints, need for tree preservation, innovative building design and planning merits that would bring about improvements to townscape and amenity of the locality and would not cause adverse landscape and visual impacts.

2.7 Government's On-going Strategy to Increase Flat Supply

- 2.7.1 The Government has put strong emphasis on increasing supply of housing land in recent years to resolve the housing and land shortage problems. In response to the societal concern, the Government initiated various fiscal measures attempting to moderate the property boom, and at the same time proposed a series of measures to increase housing supply from short, medium to long term.

Long Term Housing Strategy

- 2.7.2 The Long Term Housing Strategy ("LTHS") was first released by the Transport and Housing Bureau on 16 December 2014 to address the structural issues pertaining to Hong Kong's housing problem, and is being updated annually to make timely adjustments accordingly. According to the latest Annual Progress Report released in September 2025, the total housing supply target for the ten-year period from 2026-27 to 2035-36 is 420,000 units, of which 294,000 units are public housing supply and the remaining 126,000 units are private housing supply. The public/private split for the supply of new housing units would maintain at 70:30.

Policy Addresses

- 2.7.3 As announced in the Policy Address 2023 and 2024, the Government will continue to adopt multi-pronged strategy to increase housing land supply. The supply of land in the short-to-medium term is mainly achieved through reviewing land uses and appropriately increasing the development density to release development potential, including reviewing and optimizing the land uses of "Green Belt" areas, and revitalization of Hung Hom Station and nearby sites for residential and commercial uses. In medium to long term, the Government is actively pressing ahead with relevant studies on the various development areas in the Northern Metropolis. The Northern Metropolis Development Strategy announced by the Government would be the major source of housing supply, providing about 500,000 new housing units.
- 2.7.4 In the Policy Address 2025, the Government remains determined to sustain efforts in land production. The Government will assess the situation and take forward various projects in an orderly and pragmatic manner. The Government will also take into account the latest market changes when disposing land, ensuring a stable and healthy development of the market.

3 PROPOSED DEVELOPMENT SCHEME

3.1 The Development Scheme

- 3.1.1 Schematic drawings for the Proposed Residential Development are presented in **Appendix I** of this Supporting Planning Statement. The Application Site, with a total area of approximately 1,674.6m², yields a total GFA of approximately 8,373 m² based on a plot ratio of 5. A total of 46 residential units with an average flat size of about 182m² would be provided under the Proposed Residential Development.
- 3.1.2 The Proposed Residential Development comprises two residential blocks. The taller northern block ("**Tower 1**"), fronts onto Kotewall Road at a lower ground level (approximately +109.98 mPD), would have a total of 31 floors (+220.7mPD). Within this taller block, loading and unloading spaces are located on LG2/F, covered car-parking spaces are provided on LG1/F and G/F, and open-air car-parking spaces together with clubhouse facilities are situated on 1/F. Residential units are proposed from 2/F and onwards. The lower southern block ("**Tower 2**"), fronts onto Conduit Road at a higher ground level (approximately +141.52mPD), would have a total of 3 floors with a maximum roof height of not more than +143.66mPD. In this lower block, sheltered car-parking spaces and lift lobby are provided on the ground floor, while residential units are located on the first and second floors. The estimated population of the Proposed Residential Development is about 152 and the completion year would be 2029. **Tables 3.1 to 3.3** below summarise the key development parameters and proposed floor uses.
- 3.1.3 In order to address the substantial level difference between the two blocks and to ensure convenient and barrier-free movement for residents throughout the development, a dedicated passenger lift is proposed along the retaining structure. The lift will directly connect the first floor of Tower 1 with the ground floor of Tower 2.

Table 3.1 Technical Schedule of the Proposed Development

	Proposed Development Scheme
Total Site Area	About 1,674.6m ²
- Lots IL 946 S.B ss.1, IL 946 S.B ss.2 and IL 8314 on Kotewall Road - Lot IL 2387 S.A RP on Conduit Road	About 1067.6m ²
Domestic Plot Ratio	5
- Tower 1 - Tower 2	7.53 0.6
Domestic GFA	8,373m ²
- Tower 1 - Tower 2	8,039m ² 334m ²
No. of Unit	46
- Tower 1 - Tower 2	36 10
Average Flat Size	182m ²
Building Height* (main roof level)	
- Tower 1 - Tower 2	Not more than +220.7mPD Not more than +143.66mPD
No. of Storeys	
- Tower 1 - Tower 2	31 3
Site Coverage	Not more than 33.3%
No. of Block	2
Private Open Space	Not less than 1m ² per person

*The maximum building height at top roof would be 231.7mPD, subjected to the detail design.

Table 3.2 Proposed Floor Use of Tower 1

Floor	Proposed Use
LG2/F	Lift Lobby, E&M and Loading/Unloading Space
LG1/F to G/F	E&M and Covered Car Parking Spaces
1/F	Clubhouse, E&M and Open-air Car Parking Spaces
2/F to 32/F (4/F, 13/F, 14/F and 24/F omitted)	Residential Units
R/F	Flat Roof

Table 3.3 Proposed Floor Use of Tower 2

Floor	Proposed Use
G/F	Lift Lobby, E&M and Parking Spaces
1/F to 2/F	Residential Units
R/F	Flat Roof

3.2 OZP Conforming Scheme

- 3.2.1 Under an OZP-conforming development scheme, the Application Site would be restricted to a uniform and bulky configuration that respects the statutory height limits. The northern portion would be limited to a maximum building height of not more than +190mPD, while the southern portion would stand at not more than +156mPD (i.e. taller than the existing building). This conventional approach yields a domestic Gross Floor Area (GFA) of 7,341m² distributed across two blocks. Specifically, the conforming layout would feature a 21-storey building for *Tower 1* and a 7-storey building for *Tower 2* (**Appendix 2** refers).

Table 3.4 Technical Schedule of the OZP Conforming Scheme

	Tower 1 (1 & 1A Kotewall Road)	Tower 2 (64 Conduit Road)
Total Site Area	About 1,067.6m ²	About 607m ²
Domestic Plot Ratio	5	3.3
Domestic GFA	5,338m ²	2,003m ²
Site Coverage	About 28%	About 54%
Building Height* (main roof level)	Not more than +190mPD	Not more than +156.00mPD
No. of Storeys	21	7
No. of Units	27	14

3.3 Design Merits and Considerations

- 3.3.1 The Proposed Residential Development has been thoughtfully designed to respond to the unique site constraints, topography and surrounding urban context in the Mid-Levels West area. The design adopts a sensitive, context-responsive approach that balances development potential with significant planning gains in urban design, environmental quality, and pedestrian amenity.

Sensible Building Height

- 3.3.2 The rearrangement of building height design would reduce the overall visual bulk when viewing from Conduit Road and provides generous building separation (approximately 35 metres between the two blocks internally), and improved setbacks to adjacent developments. *Tower 2* would bring an 12.34m reduction compared to the maximum permissible height under the OZP-compliant scheme, substantially enhancing visual and air permeability for neighbouring residents at Peace Court, Imperial Court, and King's Garden.

Setback for Streetscape Improvement

- 3.3.3 A 5-metre building setback is proposed along the Kotewall Road frontage, which is currently dominated by tall retaining walls and blank facades. This setback not only mitigates the oppressiveness of the existing streetscape but also allows for meaningful greening, landscaping, and high-quality public realm enhancements at street level.

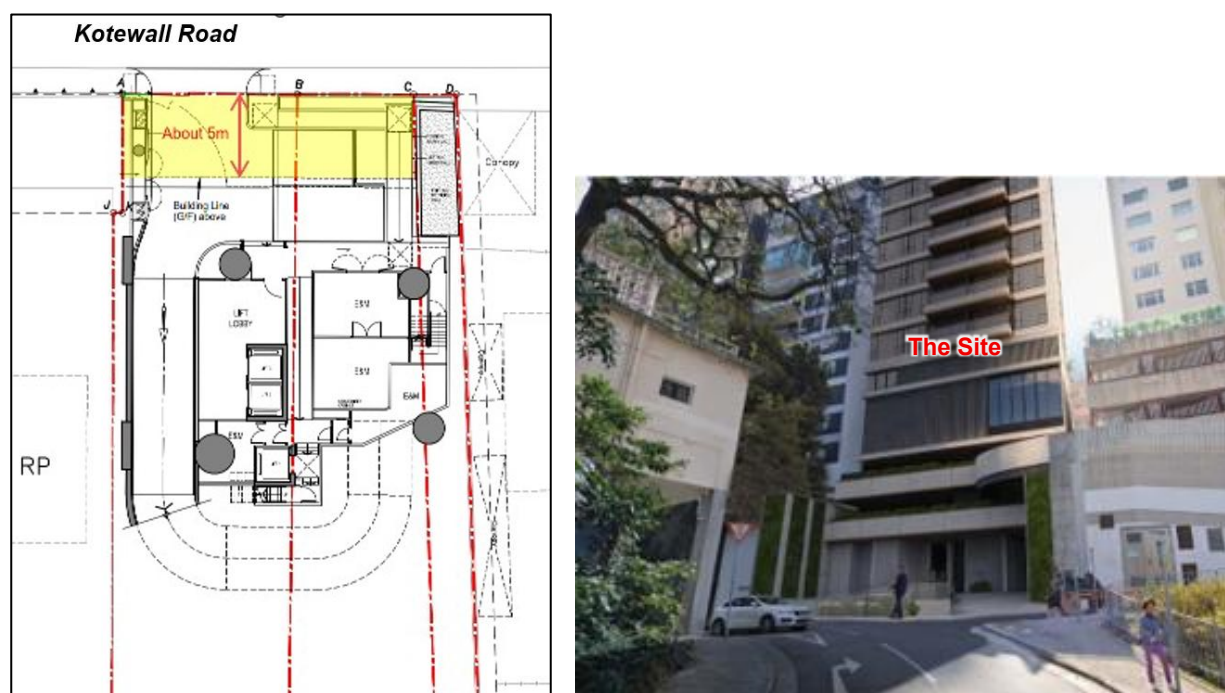


Figure 3.1 Proposed Setback for Streetscape Improvement

3.4 Access Arrangement and Internal Transportation Provision

- 3.4.1 For the access arrangement of the *Tower 1*, generally all vehicles will enter via 1 & 1A Kotewall Road and leave via Villa Veneto, except for vehicles using the accessible car parking space and LGV loading / unloading bays on LG2/F. These vehicles will share the same entrance but leave via 1 & 1A Kotewall Road instead of Villa Veneto. For the access arrangement of *Tower 2*, all vehicles will enter and leave via right-of-way shared with Peace Court, King's Garden, Wah Sen Court and Kiu Sen Court, and is connected to Conduit Road. The total internal transport facilities provision is shown in **Table 3.5**.

Table 3.5 Internal Transport Facilities Provision

Types of Facilities	Proposed Provision
Car Parking Spaces	
• Tower 1	31 nos.
• Tower 2	10 nos.
Total	41 nos.*
Motorcycle Parking Spaces	
• Tower 1	1 no.
Total	1 no.
Loading/Unloading Bays for Goods Vehicle	
• Tower 1	Light Goods Vehicle: 1 no.
Total	1 no.

4 PLANNING MERITS AND JUSTIFICATIONS

4.1 The Proposed Development is Compatible with Surrounding Developments

- 4.1.1 Situated in a residential area predominantly with medium- to high-rise developments scattered with low-rise residential developments, the Proposed Residential Development has been carefully designed to respect the development intensity in the surrounding context. *Tower 1* at Kotewall Road level (31 storeys; about +220.7mPD) is in similar scale that is compatible with immediate high-rise neighbourhood such as Villa Veneto (30 storeys; about +222.1mPD). Concurrently, the building height of *Tower 2* has been reduced to only having 1 level at/above Conduit Road level and would be significantly lower than the height of the adjacent buildings, such as Peace Court (4 storeys) and King's Garden (8 storeys). These provide a sensitive transition and maintaining building height compatibility within the neighborhood.

4.2 Compliance with OZP Planning Intention and Minor Relaxation Criteria

- 4.2.1 According to the Explanatory Statement ("ES") of the Approved OZP, minor relaxation of building height restriction will be considered by the TPB based on individual planning merits. Taking into consideration of the site characteristics and locational factor, the Applicants has made the greatest endeavours to come up with an optimal design that responses to the assessment criteria as set out in the Explanatory Statement of the Approved OZP for minor relaxation of building height restriction. The Proposed Residential Development responses to the following criteria for consideration of minor relaxation of building height restriction:

Amalgamating smaller sites for achieving better urban design and local area improvements

- 4.2.2 The Proposed Residential Development consolidates four fragmented private lots into a single site for a comprehensive development. This amalgamation enables more efficient land use and supports a well-planned redevelopment that would be technically difficult on smaller individual parcels. The proposal facilitates better building design, improved site layout with higher efficiency, more communal open space and clubhouse area shared by the residents, resulting in enhanced urban design quality and significant local improvements.
- 4.2.3 To be specific, if 64 Conduit Road was to be redeveloped individually as per the OZP conforming scheme, it will result in a cramped environment with little separations between adjacent buildings.

Provision of Better Streetscape and Quality Street-Level Public Urban Space

- 4.2.4 The existing walking condition on Kotewall Road is generally not very appealing. There are either tall retaining structures, tall blank walls or carport openings on Kotewall Road (**Figure 4.1** refers). The Applicants propose to provide a 5m setback to alleviate the intrusiveness of the proposed building and offer some greening at the same time. This setback introduces landscaping and greening elements, greatly enhancing the pedestrian environment and visual amenity at street level. By activating the frontage and creating a more inviting, human-scale streetscape, this would very much help to enhance the visual amenity right at the junction of Kotewall Road/Robinson Road and Oakland Avenue (**Figure 4.2** refers), while responses positively to the minor relaxation clause as stipulated under the covering notes of the Approved OZP for “providing better streetscape / good quality street level public urban space”. Such area with streetscape improvement would be maintained by the Applicants in the future.



Figure 4.1 Existing Condition of the Walking Environment on Kotewall Road



Figure 4.2 Comparison of the Walking Environment Pre and Post Development

Provision of Separation Between Buildings to Enhance Air and Visual Permeability

- 4.2.5 The Proposed Residential Development has carefully designed the building height profile with two blocks of differing heights, creating generous gaps between buildings and neighbouring developments. This spatial arrangement with not less than 35m building separation between *Tower 1* and *Tower 2* could improve airflow through the site and surrounding areas. Additionally, the enhanced building separation maintains sightlines and visual permeability, preserving neighborhood openness and mitigating visual obstruction within the dense urban environments.

Bring Improvements to Townscape and Amenity of the Locality

- 4.2.6 Tower 2 has been designed to be substantially lower than the permissible building height. On one hand, this would enhance openness amongst existing buildings as mentioned above. On the other hand, and together with the Applicant's efforts in relocating the rooftop E&M facilities, the green roof at Tower 2 would help to enhance the amenity of the locality. Although Tower 2 is not located about Conduit Road, the proposed green roof is still visible from Conduit Road at eye level (FigXX refers).

4.3 Bring Openness to the Adjoining Developments

- 4.3.1 With reference to the OZP-Compliant Scheme (**Appendix 2** refers), which is permitted as-of-right if the site was to be developed individually, the existing building at 64 Conduit Road could be redeveloped into a 7-storey building, with a maximum building height of 156mPD (Building Height Restriction under prevailing Approved OZP). This will be of a similar height as Peace Court at 64A Conduit Road, just about 2-4m to the south of the Application Site. Not least, the distance between the existing buildings to the east and west (i.e. Imperial Court and King's Garden) would only be about 2m and 6m respectively (**Figure 4.3** refers), resulting in a relatively enclosed and high-density living environment for surrounding

residents.

4.3.2 In contrast, the building height of *Tower 2* of the Proposed Development Scheme is 12.34m lower than the OZP-Compliant Scheme (+143.66mPD vs +156mPD). This intentional lowering of *Tower 2* would create greater openness, improve visual and air permeability, and enhance the overall living conditions and outlook for residents in the immediately adjacent properties. In terms of building separation, the building distance between the Proposed Development and Peace Court has been increased from 2m to 8m for enhancing the openness with better air ventilation and day light penetration. In terms of building height, it is proposed that a green roof would be provide on the top roof level of Tower 2

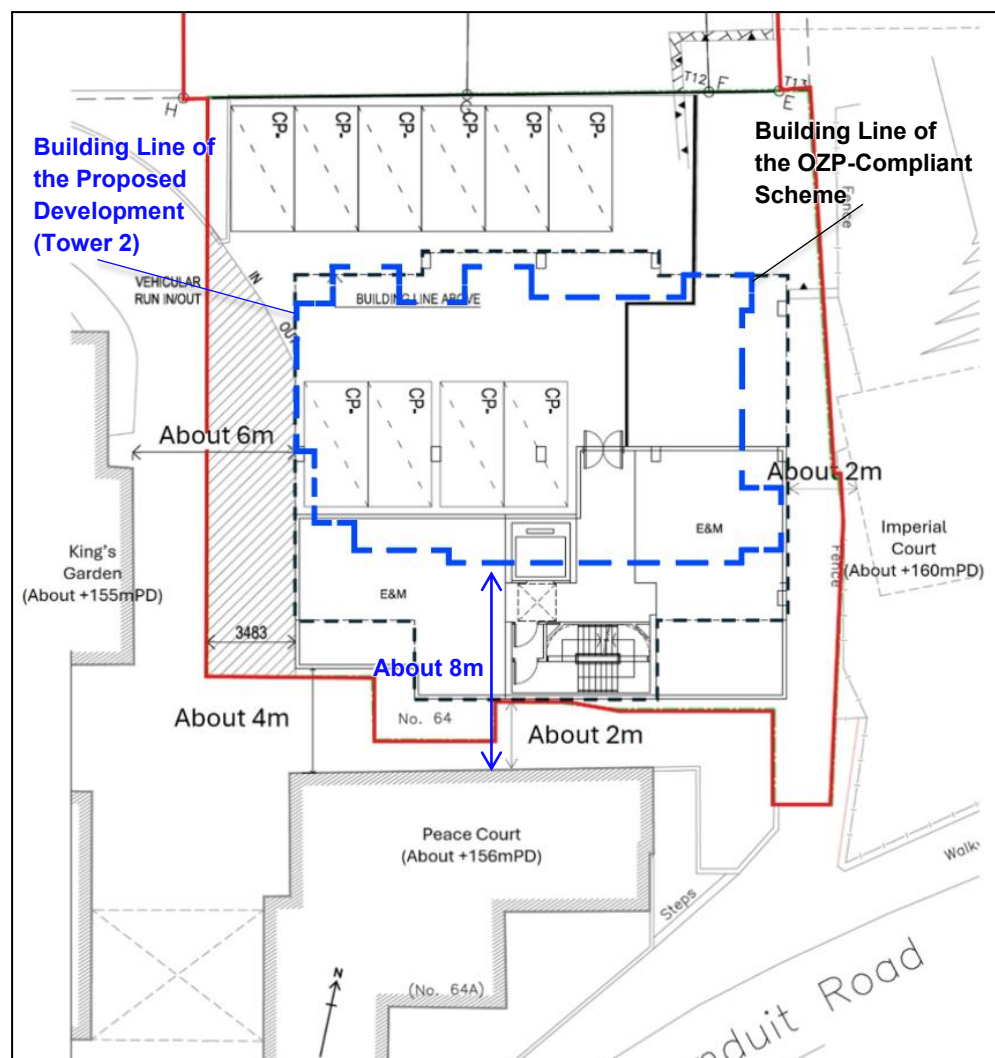


Figure 4.3 Separation Distance between Adjacent Buildings under the OZP-Compliant Scheme and Proposed Scheme



Figure 4.4 Comparison of Visual Openness among OZP-Compliant Scheme, Existing Building and the Proposed Development

4.4 Adopt a Sensible Design without Encroaching the 20% Building Free Zone

- 4.4.1 Noting the importance of protecting the ridgeline when viewing from the opposite side of the Victoria Harbour, the Applicants have adopted a sensible approach when devising the Proposed Residential Development Scheme. The Applicants had thought of accommodating all the development potential at the Kotewall Road level, resulting in a taller development compared with the current proposal but having an open space between Peace Court, Imperial Court and King's Garden. Not least, the Applicants had also thought of accommodating all internal transport facilities underneath Tower 1 for easy management, better efficiency and to confine into a single ingress and egress point.
- 4.4.2 However, these would result in a building height that would encroach the 20% Building Free Zone and affect the protected ridgeline view. As a balanced approach, the Applicants chose to relocate some GFA from *Tower 1* and create a lower block at Conduit Road level coupled with a few car parking spaces. This pragmatic solution preserves the integrity of the ridgeline protection Building Free Zone, while achieves a good separation and openness for the adjoining properties. The result is a well-considered design that balances development needs, public aspirations on respecting the Building Free Zone and the amenity of the surrounding.

4.5 Reasonable and Acceptable Floor-to-Floor Height

- 4.5.1 The Proposed Development incorporates optimized floor-to-floor height to enhance spatial quality and functionality. The lift lobby of Tower 1 on LG2/F and the clubhouse on 1/F have been kept at about 4.3m and 4.775m respectively without reaching some 5 to 6m floor-to-floor height that are commonly found in prestigious residential developments. Floor-to-floor height of LG1/F for the use of car parking spaces has been kept at about 3.4m, which is considered a minimum provision in view of the minimum headroom requirement (i.e. 2.4m for private cars as recommend in HKSPG) plus the necessary structure and E&M. The G/F car park has a slightly higher floor-to-floor height of about 4.025m. This is to incorporate the horizontal structure zone that is required by the floor slab that cantilevers over the slope.
- 4.5.2 For the residential portion, a floor-to-floor height of about **3.3m** has been adopted, except for the duplex units on the top floor (32/F) of Tower 1. The proposed floor-to-floor height is considered reasonable and acceptable; it also echoes with the prestigious living environment at the Mid-Levels West.

4.6 No Unacceptable Visual Impact to the Selected Public Viewpoint

- 4.6.1 The Visual Impact Assessment in **Appendix 3** provides visual assessment to 6 selected viewpoints with the aid of photomontages. The Proposed Residential Development, being in a dense urban environment, would be visually compatible with the existing built urban fabric when viewing from the Strategic Viewpoint in West Kowloon Culture District (VP6) and the public viewpoint from Lugard Road Lookout (VP4). The Proposed Residential Development is also barely visible when viewing from different district and local open spaces, e.g. Sun Yat Sen Memorial Park (VP5), Bonham Road Rest Garden (VP1) and Kotewall Road Rest Garden (VP3), as views from these viewpoints towards the Proposed Residential Development would be blocked by existing and planned high-rise developments. When viewing from a closer viewpoint from West End Park (VP2), the proposed building at **+220.7mPD** would still appear to be visually compatible with the adjoining high-rise developments. Therefore, the Visual Impact Assessment concludes that the Proposed Residential Development would not bring unacceptable visual impact.

4.7 Sensitive Response to Severe Site Constraints

- 4.7.1 The site suffers from exceptional historical access constraints, shared rights-of-way, very close proximity to neighbouring buildings and retaining walls, and substantial level differences. These factors severely limit conventional redevelopment options and make a standard single-block or uniform-height approach impractical.
- 4.7.2 The proposed dual-block, stepped arrangement is a pragmatic and balanced solution that maximises efficient use of land while responding these constraints. The scheme maximises land utilisation while fully respecting the access rights and addressing the level difference of exiting topography through internal lift connections. This design demonstrates thoughtful engineering and planning to overcome the site's challenges, resulting in an efficient redevelopment that delivers high quality residential accommodation.

4.8 The Proposal is Technically Feasible

Traffic Aspect (Appendix 3 refers)

- 4.8.1 The potential traffic impact arising from the Site has been quantitatively assessed in the Traffic Impact Assessment ("TIA"). Year 2032 peak hour traffic flows for the junction capacity analysis are produced (i) with existing traffic flows; (ii) adopted traffic growth from 2026 to 2032; (iii) expected traffic generation by the planned developments located in the vicinity; and (iv) net change in traffic generation between the OZP-Compliant Scheme and the S16 Scheme. The TIA concludes that the traffic generation by the S16 Scheme has negligible traffic impact to the

surrounding road network and is acceptable from traffic terms.

Visual Aspect (Appendix 4 refers)

- 4.8.2 A Visual Impact Assessment ("VIA") has been conducted to assess the visual impact associated with the Proposed Development. The resultant overall visual impact of the Proposed Development to the Visual Sensitive Receivers ("VSRs") represented by the selected Viewpoints ("VPs") would be negligible to slight. The proposed relatively minor height relaxation would make a relatively small difference to the level of predicted visual impacts. The development proposal is in-tune with its high-rise residential urban fabric and that the adoption of the proposed architectural façade design would further mitigate the predicted residual visual impacts.

Noise Aspect (Appendix 5 refers)

- 4.8.3 Potential noise impacts of the Proposed Development have been assessed in the Noise Impact Assessment ("NIA"). As the Proposed Development is primarily surrounded by residential areas, major fixed plant noise sources are not anticipated nearby. The planned fixed noise sources of the Proposed Development should not cause any adverse noise impacts if the maximum allowable sound power levels for the building service equipment and measures are properly implemented. Traffic noise impact assessment has been conducted based on predicted peak traffic flow (15 years upon the commencement of Project, Year 2044). Under the Base Scenario, the maximum predicted traffic noise is 70dB(A) and compliance rate is 100%. As such, there is no adverse noise impact anticipated.

Drainage Aspect (Appendix 6 refers)

- 4.8.4 The Drainage Impact Assessment ("DIA") has been undertaken to assess the potential drainage impact of the Proposed Residential Development. The results indicate that the existing stormwater pipes are able to cater for the expected stormwater flow. Stormwater discharge from the Site is proposed to be collected by terminal manhole TSWMH-01 and discharged via the proposed pipe PP01, which has a diameter of 355mm. This pipe will be connected to the existing public stormwater manhole SMH7034822. Both the existing and proposed pipes will be able to cater for the expected peak stormwater flow. Therefore, no adverse drainage impact arising from the Proposed Development is anticipated.

Sewerage Aspect (Appendix 7 refers)

- 4.8.5 This Sewerage Impact Assessment ("SIA") has been undertaken to assess the potential sewerage impact of the Proposed Development. The results indicate that the existing sewers are able to cater for the expected sewage flow. Sewage discharge from the Site is proposed to be collected by terminal manhole T-FWMH-01 and discharged via the proposed pipe PP01, which has a diameter of 225 mm. This pipe will be connected to the existing sewer manhole FMH7031810. Both the existing and proposed sewers will be able to cater for the expected peak sewage flow. Therefore, no adverse sewerage impact arising from the Proposed

Development is anticipated.

Air Quality Aspect (Appendix 8 refers)

- 4.8.6 The air quality impact from the construction of the Proposed Development on the surrounding area, as well as the impact from the surrounding area on the proposed development, has been assessed. With the implementation of air quality control measures along with adherence to good site practices, no adverse air quality impacts associated with the construction works of the Proposed Development are expected. Moreover, the suggested buffer distances for road traffic emissions and industrial chimney from the Hong Kong Planning Standards and Guidelines have been fulfilled. Therefore, vehicular emissions and industrial chimney emissions are not expected to constrain the Proposed Development during operation phase. No noticeable odour was identified near the two nearby RCPs and an open channel. Considering the gradient of the channel, the future accumulation of polluted water is unlikely. The management of the RCPs is also expected to remain consistent with existing conditions. Therefore, no adverse odour impact arising from the two nearby RCPs and an open channel is anticipated.

Geotechnical Aspect (Appendix 9 refers)

- 4.8.7 A Geotechnical Planning Review Report has been conducted to concluded that Proposed Development at the Site is considered to be geotechnically feasible. Site formation / slope stabilization works may be required for this development for upgrading the existing slope/retaining wall to meet the current geotechnical safety standard which maintained by the lot owner. The proposed foundation shall involve piling foundation. The adverse effect of foundation works on the existing feature and structure would be considered in detail design stage and will not be rendered to an unacceptable level.

5 CONCLUSION AND SUMMARY

5.1 In light of the above, it is believed that the Proposed Residential Development at 1 & 1A Kotewall Road and 64 Conduit Road, Mid-levels, can now be favourably considered by the TPB from a planning point of view.

5.2 The Planning Department and Members of the TPB are respectfully requested to give favourable consideration to support the Proposed Residential Development based on the following:

- The Proposed Development is compatible with the surrounding medium- to high-rise residential developments. Through careful design of building height provides a sensitive height transition with adjacent buildings.
- The proposal offers a more pleasant walking environment on Kotewall Road through a 5m setback and greening, alleviating the impact of tall retaining walls and blank facades along Robinson Road and Kotewall Road.
- The Proposed Residential Development brings greater openness to adjoining developments by reducing the height of the lower block by 12.34m compared to an OZP-compliant scheme, creating a more comfortable living environment with improved separation from neighbouring buildings like Peace Court, Imperial Court, and King's Garden.
- The design adopts a sensible approach that avoids encroaching the 20% Building Free Zone for ridgeline protection, balancing GFA distribution between the two blocks while prioritizing visual and spatial relief.
- No unacceptable visual impact is anticipated, as demonstrated by a Visual Impact Assessment assessing viewpoints from strategic locations (e.g., West Kowloon Cultural District, Lugard Road Lookout) and local open spaces (e.g., Sun Yat Sen Memorial Park, Bonham Road Rest Garden). The development is compatible with the dense urban fabric.

- The proposed minor relaxation of building height is appropriate given site constraints from historical land issues, shared access, and topography, without increasing overall development intensity.
- Technical assessments have been demonstrating feasibility without adverse impacts on traffic, visual, drainage, sewerage, noise, geotechnical and air quality on the surrounding environment.