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

Response-to-Comment Table

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(Planning Application No. A/H11 /108)

Further Information No. 1

Comments	Response
Comments from the Hong Kong District Planning Office, Planning Department **(Contact Person: Ms. Kay CHEUNG, Tel: [redacted])**	
Application Form of the Applicant's submission	
1. Private open space of not less than 304 m^2 is provided in the proposed development as claimed by the Applicant. Whilst there is no other relevant information provided in the submission (apart from the application form), please provide details of the proposed private open space (including but not limited to location and design) and reflect it on relevant plans/drawings. As for the OZP Conforming Scheme, please also clarify whether any private open space is provided. If affirmative, please provide details and reflect on relevant plans/drawings.	The planned population of the Proposed Development would be about 152, assuming the average domestic household size is 3.3 persons according to Population By-census 2021. The estimated population as stated in the Sewerage Impact Assessment Report is more than 152 as it has adopted a conservative approach to assess the infrastructural capacity. These have been stated in Remarks 1 & 2 of **Table 3.1** of the SIA report (**Appendix IV** refers). The Applicant is aware that the requirement under HKPSG is to provide not less than $1m^2$ per person private open space, the Proposed Development Scheme has therefore provided a total of about $170m^2$ private open space, which could comply with the requirement. Relevant plans have been revised accordingly (**Appendix II** refers). Adopting the same assumption for OZP-Compliant Schemes, the planned population would be about 136 and a total of not less than $136m^2$ open space would be provided.
The Supporting Planning Statement (SPS) of the Applicant's submission	
2. Para. 2.3.3 of the SPS: As mentioned by the Applicant, the existing formation level cannot be modified at 64 Conduit Road due to the	Portion of the Application Site at 64 Conduit Road (IL 2387 S.A RP) is subject to a mandatory right-of-way (ROW) that serves as the essential

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right-of-way arrangements with adjoining developments. Please further explain how it constrained the site formation level modification and clarify the meanings of "invert levels of the existing public sewer/stormwater pipes" and "single discharge point".	vehicular driveway for adjacent developments, including Peace Court and King's Garden. While this driveway directly connects and integrates with the existing entrance levels of these surrounding properties, any lowering or raising of the site formation level at 64 Conduit Road would break the continuous gradient required for safe vehicle passage, obstruct access, and disrupt adjacent existing retaining structures. As such, the site formation level at this portion of the Site should remain at existing level, i.e. approximately +132.6mPD. While the site formation level cannot be modified due to the limitation of existing ROW, the two sites are better to be developed as one single development to address technical constraint, such as stormwater discharge. Given that the existing public stormwater drain along Conduit Road is at a relatively high invert levels, an independent gravity connection from 64 Conduit Road at a lower level to those pipes at a higher level would not be technically feasible. To overcome these spatial and topographical constraints, the Proposed Development adopts a single discharge point approach to utilises the site's natural elevation drop to route all stormwater downhill at the lower Kotewall Road level by gravity.
3. Para. 3.3.3 of the SPS: A 5m building setback along Kotewall Road is proposed by the Applicant, please clarify if the vehicular egress on G/F of the proposed development via a ramp within the adjacent lot(s) discharging to Kotewall Road would encroach on to the proposed 5m building setback area. In addition, please clarify whether such proposed setback area will be dedicated for public use / surrendered to the Government for road widening, and the management and maintenance (M&M) arrangement for such area;	A 5m building/tower setback is proposed along Kotewall Road to minimise the perceived building bulk and visual impact, improve the streetscape and provide space for roadside greening. With the proposed building/tower setback, the proposed building would align with the surrounding residential buildings (i.e. Villa Veneto and Richmond Court) along Kotewall Road/Robinson Road to allow a more openable street view for pedestrians. The vehicular egress on G/F connecting the ROW within Villa Veneto will pass through the 5m setback inevitably to join the existing ROW. The Applicant will be responsible for the management

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and please indicate the proposed 5m building setback in relevant floor plans and section for clarity.	and maintenance arrangement of the proposed 5m setback. At this stage, the Applicant has no intention to surrender to the Government. Please refer to the section plan and LG1/F layout for the annotations of the proposed 5m tower setback.
4. Para. 3.3.4 of the SPS: A new sheltered minibus station will be integrated into the ground floor of Tower 2 as mentioned by the Applicant, please provide details of the proposed sheltered facility (including but not limited to location, design and M&M arrangement) and clarify the interfacing issues of the proposed sheltered facility (that involves government land) with the proposed development. The proposed shelter should also be reflected on relevant plans/ drawings/renderings for clarity.	After careful consideration of technical feasibility, the Applicant will not propose a sheltered minibus station at this stage. Relevant sections have been removed (**Appendix I** refers). The Applicant will further explore any other possible improvement measures.
5. Table 3.1 of the SPS: Please provide the individual GFA and PR of Tower 1 and Tower 2 of the proposed development in this Table.	Table 3.1 has been revised (**Appendix I** refers).
6. Table 3.4 of the SPS: The Applicant should ensure the accuracy of information in the submission, in particular the followings:	
(i) It is observed that the total site area of Tower 1 and Tower 2 (i.e. About 1,633m2 = 607m2 + 1026m2) does not tally with the total site area of the subject planning application (i.e. About 1,674.6m2), please review and revise as appropriate.	Noted. Table 3.4 has been revised accordingly (**Appendix I** refers).
(ii) It is observed that the total site area of Tower 1 and Tower 2 (i.e. About 1,633m2 = 607m2 + 1026m2) does not tally with the total site area of the subject planning application (i.e. About 1,674.6m2), please review and revise as appropriate.	Noted. Table 3.4 has been revised accordingly (**Appendix I** refers).

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(iii) Please provide the proposed site coverage of Tower 1 and Tower 2 respectively.	The site coverage of Tower 1 and Tower 2 under the OZP-Compliant scheme would be 28% and 54% respectively (**Appendix I** refers).
7. Figure 4.2 of the SPS: The left photo of 'Buildings at 1&1A Kotewall Road (demolished) should reflect the existing condition of the subject site (i.e. the building has already been demolished). The applicant should ensure the site photos provided are up-to-date, please update the site photo.	Noted. Figure 4.2 has been revised accordingly (**Appendix I** refers).
8. Para. 4.2.5 of the SPS: A 35m building separation between Tower 1 and Tower 2 is provided as mentioned by the Applicant, the Applicant should clarify and show the difference between the proposed scheme and the OZP Conforming Scheme to demonstrate how it can improve airflow through the site and surrounding areas. Please indicate the building distance between Tower 1 and Tower 2 of the proposed development on relevant plans and section in Appendices I and II of the SPS.	Under the OZP Conforming Scheme, it is assumed that the two sites would be redeveloped individually which means that sufficient building separation between building block is not ensured. The OZP Conforming Scheme indicated that there will only be about 8m tower setback from the southern boundary for Tower 1; and 6m setback from the northern boundary for Tower 2. There will only be a total of about 14m building separation. In contrast, as demonstrated in the layout plan of the Proposed Development, building separation with a total of about 35m would be proposed. While the site would be developed as a single development, the building separation could be better secured, subject to the detailed design in the building plan submission stage. The proposed disposition would better maintain light and airflow to the surrounding buildings.
9. Para. 4.3 of the SPS: Regarding the openness to the adjoining developments, the Applicant should clarify and show the difference between the proposed scheme and the OZP Conforming Scheme, please indicate the building distance between the proposed	Building separation between the Proposed Development and surrounding buildings have been incorporated in relevant plans. To demonstrate the openness to the adjoining developments, a photomontage has been

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development and surrounding buildings on block plans and relevant sections in Appendices I and II of the SPS. 10. Para. 4.5 of the SPS: Regarding the Floor-to-Floor (FTF) Height of the proposed development, the Applicant is requested to provide justifications on the proposed FTF height for the 3.5m to 4m-high residential floors and the 4.025 to 4.3m-high E&M floors as well as the 4.775m-high clubhouse/E&M floor (1/F), with examples regarding the FTF height of relevant floors on the existing surrounding residential developments in the vicinity.	supplemented in Section 4.3 of the Supporting Planning Statement (**Appendix I** refers). The Floor-to-Floor (FTF) Height of the proposed development has been refined to 3.3m for typical residential floors and 3.3m to 4m for the upmost 3 floors for duplex/ special units of Tower 1. Reference of existing surrounding residential developments within the same OZP in recent years have been listed in the below table. **Floor-to-Floor Height** / **Surrounding Residential Developments** 8 Castle Road / 23 Po Shan Road / 18 Caine Road / 42-44 Kotewall Road **Residential Floors (Typical)**: 3.5m / 3.5m / 3.16 to 3.3m / 3.47m **Residential Floors (Special Units)**: 4m / 3.9m / 3.5m / 3.49m to 4.45m **Clubhouse**: 4.5m / N/A / 4.72m / 5m **E&M Floors**: 4.5m / 4.5m / 4.9m / 3.85m to 5m The typical residential FTF height of 3.3m of the Proposed Development is comparable to, or lower than, that of the surrounding residential developments ranging from 3.16m to 3.5m. A higher FTF height of up to 4m-4.45m is confined to the uppermost special units/ duplex floors. On

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	this basis, the FTF heights of the Proposed Development are reasonable and not excessive.
11. Para. 4.7 of the SPS: Whilst a lift tower is proposed between Tower 1 and Tower 2 under the proposed scheme, please clarify the rationale of demolishing the existing elevated walkway connecting 64 Conduit Road and Conduit Road under the proposed scheme.	To facilitate internal circulation within the Application Site, the layout of the Conduit Road site has been revised to provide an open bridge connecting the Site and Conduit Road. Compared with the existing bulky elevated walkway, the open bridge could enhance the visual openness to the surrounding buildings and minimise its visual impact.
<u>Geotechnical Planning Review Report (GPRR) of the Applicant's submission</u>	
12. Discrepancies on development parameters are found between the GPRR and the proposed scheme:	
(i) Sections 1 & 2.2: Please review and revise the number of storey of the proposed development.	Page 3 and Page 5 of the report have been revised accordingly.
(ii) Section 4.3 and Appendix H2: Regarding the determined bulk excavation limit, with reference to Appendix H2 of the GPRR, it is unclear how the General Building Plan mentioned in this section relates to the proposed development, the Applicant should review and explain clearly in this section supported with relevant information.	As the proposed development does not require bulk excavation below the bulk excavation limit, Appendix H2 has been removed and Section 4.3 has been updated accordingly. Page 19 and Page 27 and the Schematic section have been revised (**Appendix V** refers).
13. The Applicant is requested to ensure the consistency and accuracy of information in the full submission including technical assessments.	Noted.

Comments	Response
14. Public comments on A/H11/108 are attached in the file below for the Applicant's response/clarification.	Public comments have been addressed on the covered letter of the submission.
General Comment	
15. Further to this office's comments dated 31.7.2026, the subject application currently has weak justifications with very few planning & design merits for such proposed relaxation of BHR from 190mPD to 225.5mPD (i.e. a significant increase of +35.5m or +18.68% in terms of mPD) in the "R(B)" zone of the application site. The Applicant should critically review the submission and provide solid justifications with evidence in the submission.	In response to PlanD's concern on the proposed minor relaxation of building height, the Applicant has considered the following improvements of the proposed scheme, including: (i) To further create openness and visual attraction to the surrounding residential developments and improve the living environment of the area, the Applicant has revised the layout of Tower 2 to relocate the rooftop E&M facilities and provide additional greenery at the top roof level. The main roof level has also been reduced from +144.56mPD to +143.66mPD, which would be about the eye level of the pedestrian viewing from Conduit Road (+141.52mPD+1.5m = 143.02mPD). As demonstrated in Section 4.3 of **Appendix I**, these measures would effectively reduce the perceived building bulk compared with the existing building (about +149.5mPD) and OZP-Compliant (about +156mPD). (ii) A significant reduction of the building height of Tower 1 by 4.8m, i.e. from 225.5mPD to 220.7mPD, resulting in only seeking a +16.2% increase in terms of mPD. The floor-to-floor height of Tower 1 has been refined from 3.5m to 3.3m to avoid significant negative visual blockage.

Comments	Response
Traffic Impact Assessment (TIA) of the Applicant's submission 16. Para. 4.1 of the TIA: Discrepancy is found on the completion year of the proposed development between the TIA and para. 3.1.2 of the Supporting Planning Statement (SPS), please review and revise for consistency. 17. Para. 4.6 of the TIA: The Applicant should clarify the basis of selecting the planned development in the vicinity of the application site (i.e. the criterion of selecting the planned development). Based on our records, the proposed developments at 7 Hospital Road and 120-126 High Street are also in the vicinity of the application site, please review and clarify whether these developments should be included in this section. Comments from the Building Department (which is the authority for approving private developments/redevelopment projects) should be sought regarding the latest updates of on-going developments in the vicinity of the application site.	The completion year has been revised to 2029, which is aligned with the TIA report. The criterion for selecting planned developments in the vicinity is based on whether these developments will have direct impact to the junctions assessed. The planned developments at 7 Hospital Road and 120 – 126 High Street are located at considerable distance from the Application Site and the junctions assessed, and the vehicles generated / attracted by these 2 planned developments are expected to use the roads in the lower Mid-Levels e.g., Hospital Road, High Street, etc, instead of the roads in the upper Mid-Levels, say, Kotewall Road and Conduit Road. Hence, the traffic generated / attracted from these 2 planned developments have not been included in the junction assessment.
Comments from the Urban Design & Landscape Section (Urban Design Unit), Planning Department: **(Contact Person: Ms. Vanessa TSANG, Tel: [redacted])** The following rectifications should be noted for the Visual Impact Assessment:	

Comments	Response
1. VP2 and VP3 – the sensitivity of public viewers from these two VP should be "medium".	Noted and revised accordingly (**Appendix VI** refers).
2. 6th bullet point of para. 3.2.2 – the building height of Dragonview Court should read "+213.1mPD".	Noted and revised accordingly (**Appendix VI** refers).
Comments from the Architectural Services Department: **(Contact Person: Mr. SUM Chi Ho, Sherman, Tel: [redacted])**	
1. According to the Visual Impact Assessment and Architectural Drawings provided, it is noted that the proposed development is located on a long and narrow strip of land in very close proximity to existing residential buildings. The proposal shall not reduce the quantity of light and air available to other existing buildings in accordance with Building (Planning) Regulations 37. It is recommended to review the design and disposition of the proposed development to ensure that the light and air available to other existing buildings shall not be diminished.	The Applicants have carefully considered the design and disposition of the Proposed Development to avoid reducing the light and air available to those buildings, having regard to Building (Planning) Regulation 37. A building separation of about 35m is provided between Tower 1 and Tower 2 to maintains an open corridor across the Site for light, air and visual permeability, both for the Proposed Development and for the adjoining buildings. Besides, the Applicant has also considered to provide building setback from the surrounding buildings to avoid potential negative impact. As demonstrated in Section 4.3 of **Appendix I**, the Tower 2 is relatively setback from surrounding buildings with a lower building height compared with the OZP-Compliant Scheme. It can generate a courtyard like spatial improvement among the dense building clusters in terms of light, air and visual perspectives.

Comments	Response
2. To avoid adverse impact on the ventilation and air permeability, it is recommended that the separation between Tower 1 and Tower 2 shall not be minimized.	Please note that a building separation of about 35m between Tower 1 and Tower 2 will be provided to avoid reduction of the quantity of light and air available to other existing buildings as well as the Proposed Development.
3. As advised by ArchSD, the Applicant is requested to provide clarification supported with evidences in response to paras. 1 and 2 of ArchSD's comments above.	Building distance between the Proposed Development and the surrounding buildings have been incorporated in relevant plans to demonstrate that sufficient separation would be preserved to allow sufficient wind and light penetration in accordance with the Building (Planning) Regulations 37.
Comments from the Drainage Services Department **(Contact Person: Mr. Richard NG, Tel: [redacted])** Drainage Impact Assessment	
1. The proposed PP01 pipe, which has a diameter of 350mm, is not a standard size for a precast concrete pipe. Would the AP please review.	Noted. The proposed pipe has been revised to a 355mm PE pipes. Internal diameter of PE pipe with SDR17 has been adopted in the calculation. Sections 3.4.1 & 4.1.3, Table 3-5, Figure 3-3 & Appendix 3-2 have been revised accordingly (**Appendix VII** refers).
2. Besides, 350mm is also not a standard size of PE pipe. If NS355 PE pipe is adopted, the appropriate pipe internal diameter should be used for the design calculation, taking into account the pipe thickness (subject to adopted pressure rating or SDR number).	Please refer to the RtC item 1 above.

Comments	Response
Sewerage Impact Assessment	
3. Please note that comments of this department in the sewerage aspect are subject to the views and agreement of the Environmental Protection Department, as the planning authority of sewerage infrastructure.	SIA has been submitted to both EPD and DSD for approval.
4. Please be reminded that as per DSD's Corrigendum No. 1/2024 for Sewerage Manual Part 1, polyethylene (PE) pipes should be used for sewers with diameter not exceeding 375mm.	Noted. Only PE pipe is proposed in current submission.
5. Please advise the pressure rating (or SDR) for the proposed 200mm dia. Pipe from the proposed sewage terminal manhole connecting to FMH70131810.	A 225mm PE pipe with SDR of 17 is proposed to connected between proposed terminal manhole to FMH7031810. Sections 3.5.1, 4.1.3, Appendix 3-3 and Note [1] in Table 3-6 have been supplemented accordingly (**Appendix IV** refers).
6. Appendix 3-2 refers. The pipe material for the sewers listed in the table should be vitrified clay. Please revise the information and use appropriate pipe roughness in the calculation.	The pipe material for the sewers has been revised as vitrified clay. The pipe roughness, pipe capacity, the utilization rates have been updated accordingly. Appendix 3-2 and Tables 3-4 has been updated accordingly (**Appendix IV** refers).
7. The downstream node for PS05 should be FGJ7005172. Please update.	The downstream node has been updated as FGJ7005172 in Appendix 3-2, Figures 3-1, 3-2 and Table 3-4 (**Appendix IV** refers).
8. Appendix 3-3 refers. Unlike vitrified clay pipes, nominal diameter for PE pipes denotes the external diameter. In the design calculation, the internal diameter of proposed PE pipes has not taken into account PE thickness. Please update the calculation.	A 225mm PE pipe with internal diameter of 200mm has been adopted in the hydraulic calculation. Sections 3.5.1, 4.1.3, Appendix 3-3 and Table 3-6 have been updated accordingly (**Appendix IV** refers).

Comments	Response
Comments from Environmental Protection Department **(Contact Person: Ms. Clara HO, Tel: [redacted])** Air Quality	
1. Section 1.3.3 – Please incorporate this section to Section 5.1.2 as they duplicate.	Section 1.3.3 has been removed accordingly (**Appendix VIII** refers).
2. Section 3.1.2, 3.1.3, Table 3-1 – Please update the 5-year AQMS data to Year 2021-2025, which can be downloaded from SAMP. Please check why Eastern AQMS is mentioned in Note [iv].	Section 3.1.2, 3.1.3, and Table 3-1 have been updated accordingly. Eastern AQMS in footnote has been revised to Central/Western AQMS (**Appendix VIII** refers).
3. Section 3.2.2, Table 3-2 – The 500m assessment area does not cover grid [38,30] according to Figure 3-1. Please revise.	Section 3.2.2 and Table 3-2 have been updated accordingly (**Appendix VIII** refers).
4. Section 3.3.14 –	
(i) The site is located next to Robinson Road. Please clarify the road type of that section of Robinson Road, discuss the buffer distance required, and update relevant discussion in Section 5 and figures accordingly.	The Robinson Road section near the Site is also a Local Distributor according to the reply from the Transport Department in response to our inquiry (Appendix 3-1). Sections 3.3.14 & 5.2.2 has been revised accordingly (**Appendix VIII** refers).
(ii) Please clarify whether the road around the south-west corner of the site and King's Garden is a public road whose buffer distance requirement needs to be considered.	There is a private access road serving 64–70 Conduit Road, which adjoins the south-western boundary of the Site. Considering it is a private access road with minimal traffic volume, no adverse air quality impact arising from this access road is anticipated. Section 3.3.15 has been supplemented accordingly (**Appendix VIII** refers).

Comments		Response
5.	Section 3.4, 3.6 – Please incorporate these sections to Section 4.3 as their content duplicate.	The contents of Section 3.4 (Concurrent Projects) and Section 3.6 (Key Criteria Pollutants – Construction Phase) have been moved to Section 4.3. The Figure 3-4 (Concurrent Projects) in previous report has been renamed as Figure 4-2 accordingly (**Appendix VIII** refers).
6.	Section 3.7.2 – Please refer to the latest Hong Kong Emission Inventory Report.	Section 3.7.2 has been revised accordingly (**Appendix VIII** refers).
7.	Table 4-2 – Please review if there is any office facility in ASR06. If not, please remove ASR06.	From the site survey conducted on 25 April 2026 (Saturday). It is identified that there is sewage facility (sewer vent) on G/F, as well as office like rooms with windows type air conditioner on both G/F & 1/F. Therefore, ASR06 is considered as an air sensitive receiver (**Appendix VIII** refers).
8.	Section 4.4.4 – Please clarify if "regular EM&A" refers to regular site audit.	The "regular EM&A" in Section 4.4.4 has been revised as "regular site audit" accordingly.

Comments		Response
9.	Section 5.1.2, 5.2.3 – Please clarify if the lobby and clubhouse would rely on central air-conditioner. If affirmative, please revise the ASR to fresh air intake of lobby and clubhouse.	The lobby and clubhouse will rely on central air-conditioning under the current plan, which is subject to detailed design, the residential flats will rely on openable windows for ventilation. Sections 5.1.2 & 5.**2.3** have been revised accordingly (**Appendix VIII** refers).
10.	Section 5.3 – Please indicate the locations of carpark exhaust and fresh air intake if such information is available.	The locations of carpark exhaust and fresh air intake for lobby and clubhouse is currently not available. The project team is reminded to located the exhaust outlet for the car park as far away as possible from nearby ASRs and/or fresh air intakes to avoid causing any potential air pollutant nuisance as stated in Section 5.3.2.
11.	Section 7.1.2 – Please rectify typo "Air Pollution Control (Fuel Restriction) Regulation**s**" in line 3.	Section 6.1.2 has been revised accordingly (**Appendix VIII** refers).
12.	Figure 1-1 – Please rectify typo for Kotewall Road.	Figure 1-1 has been revised accordingly (**Appendix VIII** refers).
13.	Figure 5-1a to 5-1c – Please add a remark that there is no air sensitive use, including openable window, fresh air intake or open space for recreational use, within the buffer zones.	The remark has been added to Figures 5-1a to 5-1c accordingly (**Appendix VIII** refers).
14.	Please highlight all changes in the next submission.	Noted. The change in main-text has been highlighted accordingly.
Sewerage		
1.	Understood that a manhole survey from FMH7031810 to FMH7031826 was conducted in Aug 2022. Please supplement the hydraulic assessment further downstream to FMH7031826 in Appendix 3.2.	**Appendix 3-2** has been updated to extend the assessment sewer to FMH7031826. The additional assessed sewers are able to cater for the sewage generated from the existing and planned development.

Comments	Response
2. For Sections 3.2.4, 3.3.1 and Appendix 3.1 to 3.3, please consider adopting Catchment Inflow Factor = 1 for Central in this SIA and revise the calculation accordingly.	Catchment Inflow Factor = 1 for Central has been adopted in the SIA. Sections 3.2.4, Tables 3-2, 3-3, 3-5, 3-6 and Appendices 3-1 and 3-2 have been updated.
3. For Sections 3.4.2, 3.4.3, Appendix 3.1 and Appendix 3.2, please confirm with DSD on the length and pipe material of existing sewers.	DSD has no comments on the pipe length and advised the pipe material. The pipe materials and the capacity have been updated. Appendix 3-2, Tables 3-4, 3-5 have been updated (**Appendix IV** refers).
4. For Appendix 3.2, according to GeoInfo Map, manhole FGJ7005172 is noted between FMH7046601and FMH7031815, please confirm and supplement.	The downstream node has been updated as FGJ7005172 in Appendix 3-2, Figures 3-1, 3-2 and Table 3-4 (**Appendix IV** refers).
Comments from the Transport Department **(Contact Person: Mr. Eric Lam, Tel: [redacted])**	
1. The application site falling within Mid-level Moratorium area. The Applicant should ensure that the design/redevelopment is permitted under the Moratorium and lease.	Noted.
2. The proposed re-development project, consists of 2 blocks of buildings, spans across multiple lots under different leases. The Applicant shall check with LandsD to ensure that the proposed re-development would comply with the lease requirements of individual lot.	Noted.

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3.	According to the requirement of HKPSG, a minimum of 1 loading/unloading bay should be provided for each housing block. However, it is noted that no loading/unloading bay would be provided at Tower 2. Please check.	Only 10 units are provided in Tower 2 and these have average flat size of only 33m^2. Tower 1 has 36 units with average flat size of 223m^2. In total, there are only 46 units (i.e., 10 + 36 =46). Since, the HKPSG recommends provision of "*Minimum of 1 loading / unloading bay for goods vehicles within the site for every 800 flats or part thereof...*", and there are only 46 units, which is about 6% of "*800 flats*" ***(Calculation: 46 / 800 = about 0.06)***, 1 LGV loading/unloading ("L/UL") bay is provided. Tower 1 and Tower 2 are separated by only around 30m-35m with lift provision between the two platforms of the tower. Hence, the LGV loading / unloading bay provided within Tower 1 shared used by Tower 2 should be considered acceptable.
4.	According to Section 3.2.1 of the Planning Statement, the "OZP-Compliant Scheme" yields a domestic Gross Floor Area (GFA) of 7,133m^2. However, in accordance with Table 3.1 of the TIA, the domestic GFA of "OZP-Compliant Scheme" is 7,341m^2. Please clarify.	Section 3.2.1 of the Supporting Planning Statement have been updated accordingly (**Appendix IX** refers).
5.	Please check the number of flat for "OZP-Compliant Scheme" in Table 3.1 of the TIA as it does not align with the drawings in Appendix 2.	The drawings in Appendix 2 have been revised accordingly (**Appendix IX** refers).
6.	The Applicant should justify the basis of formulating the "OZP-Compliant Scheme" in Section 3.2 of the TIA. The Applicant should compare the traffic impact induced by the approved Buildings Plans at the subject site with the "S16 Scheme" in the	The OZP-Compliant Scheme was formulated based on the maximum permissible plot ratio and associated statutory GFA allowed under the prevailing Outline Zoning Plan ("OZP"). This establishes a realistic baseline scenario representing the maximum development potential

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	TIA. *[As clarified by TD, on top, TD would also like the TIA to compare the "S16 Scheme" against the existing condition of the entire application site (i.e. the construction site at the 1 & 1A Kotewall Road site; and the existing condition of the 64 Conduit Road site).]*	permitted by-right for the Application Site. OZP-Compliant Scheme was formulated to demonstrate that the S16 Scheme generates negligible additional traffic during peak hours. There is currently no approved General Building Plan ("GBP") covering the whole Application Site, but only 1 &1A Kotewall Road. The parameters of the approved GBP under 1 &1A Kotewall Road has been reflected in the OZP-Compliant Scheme. For 64 Conduit Road, given that there is currently no approved GBP, the OZP-Compliant Scheme is adopted for comparison purpose. To compare the S16 Scheme against the existing condition, the 2032 junction operational performance without the S16 Scheme has also been presented alongside with S16 Scheme scenario in Table 4.8 of the TIA (**Appendix IX** refers).
7.	The Applicant proposed a vehicular access on Conduit Road for the Tower 2 and 2 nos. of vehicular accesses on Kotewall Road for the Tower 1. The AP shall justify the necessity for providing 2 nos. of vehicular accesses for the Taller Block.	The provision of 2 vehicular accesses at Tower 1 aligns with approved GBP (BD ref: 2002/22) approved on 7 February 2025. It should be noted that 1-way traffic circulation from LG2/F to G/F of Tower 1 can improve the internal traffic flow and also avoid conflict between vehicles entering and leaving at LG2/F, and also to prevent further conflict movements at the priority junction of Robinson Road / Kotewall Road. Hence, providing 2 nos. of vehicular accesses on Kotewall Road for Tower 1 is a better-off option.
8.	Based on the observation on Figure 3.1 of the SPS that part of the green walls/solid walls of the proposed development encroach onto the proposed 5m setback area, the Applicant should review	In view of the tight site constraints and the existing conditions of the adjoining developments, the Applicant has sought to deliver streetscape improvement along Kotewall Road without affecting the retaining wall of

Comments		Response
	their design of the proposed 5m setback at Kotewall Road and consider continuous footpath widening along Kotewall Road. Besides, the Applicant should clarify whether the proposed setback for footpath widening at Kotewall Road would be surrendered to the Government and indicate the proposed width of footpath for public passage after the proposed setback.	Richmond Court or the driveway of Villa Veneto. Continuous footpath widening along the full Kotewall Road frontage is therefore not practicable, as it would encroach onto these adjoining structures and access arrangements. Notwithstanding these limitations, the Applicants are willing to provide a planning gain with a 5m building setback proposed along Kotewall Road to reduce the visual bulk, introduce greening, and create a more pleasant pedestrian environment. This setback is offered as a design and amenity improvement within the Application Site. It should be clarified that the Applicant, for the time being, has no intention to surrender the 5m setback to the Government for road widening. The area will remain private land and will be managed and maintained by the Applicants / future owners. Part of the green wall / solid wall and the G/F vehicular egress would fall within the setback, so the 5m is a building setback for streetscape improvement, not a fully unobstructed public passage. The existing public footpath along Kotewall Road will continue to serve public passage.
9.	The Applicant shall demonstrate that there are sufficient sightline for the proposed vehicular accesses.	As shown in Figures 3.7 and 3.8, motorist leaving Tower 1 has visibility length of no less than 60m on Kotewall Road, which complies with the Volume 2 Chapter 3, Table 3.6.3.1 of the Transport Planning and Design Manual (**Appendix IX** refers). Figure 3.9 shows sufficient visibility to the left on Conduit Road, is around 24m to the right. However, an existing convex mirror is installed

Comments	Response
	on Conduit Road, directly opposite the access, which would help drivers see oncoming traffic from the right when exiting (**Appendix IX** refers).
10. Section 2.6 of the TIA: The Applicant should review whether the sentence of this section should be read as *'...the junctions now operate **within** capacities during the AM and PM peak hours.'*, and revise as appropriate.	Section 2.6 has been revised (**Appendix IX** refers).
Comments from the Lands Department **(Contact Person: Mr. Sze Ming TSANG, Tel: [redacted])**	
1. The planning application site ("the Site") comprises 4 private lots, namely IL 946 S.B ss.1, IL 946 ss.2, IL 8314 and IL 2387 S.A RP (collectively referred to as "the Lots"). The salient lease conditions of the Lots are summarized below:	Noted.
1 & 1A Kotewall Road (IL 946 S.B ss.1, IL 946 S.B ss.2 and IL 8314)	
2. IL 946 S.B ss.1 and IL 946 S.B ss.2 are held under Government Lease of IL 946 dated 5.4.1898 which is virtually unrestricted except non-offensive trades clause.	Noted.
3. IL 8314 is held under Conditions of Re-grant No. 11055 dated 9.3.1977 subject to the following salient lease conditions:	Noted.

Comments			Response
(i)	User	For residential purposes	
(ii)	Roofed-over Area	The total roofed-over area shall not exceed 27.5% of the area of the lot	
(iii)	Building Height	No part of any structure shall exceed a height of 464.5ft (i.e. about 141.58m) above the HKPD	
(iv)	Vehicular Access	No right of ingress or egress to or from the lot for the passage of motor vehicles	
(v)	Compliance with Buildings Ordinance		

64 Conduit Road (IL 2387 S.A RP)

4. IL 2387 S.A RP is held under Government Lease of IL 2387 dated 29.1.1930 as varied or modified by three Modification Letters dated 28.3.1949, 25.5.1993 and 17.4.1996 subject to the following salient lease conditions: — Noted.

(i)	User	For private residential purposes
(ii)	Type of building & No. of storeys	A building containing not more than five storeys of flats over carports PROVIDED that a maximum of five storeys only shall be permitted to be erected above the leavel of the portion of Conduit Road fronting IL 2387 S.A ss.2 (i.e. 64A Conduit Road) (there shall not be taken into account the

Comments			Response
		Lower Ground Floor and the level underneath the said Lower Ground Floor as shown on Drawing No. G-2/8 approved by the Director of Buildings on 10.1.1995 under reference no. BD 2/2043/93 provided that the said floors shall not be used for any purpose other than the purpose of water tank and pump room, switch room, lift machine room, caretaker's quarters, caretaker's office, entrance lobby, sprinkler water tank and sprinkler pump room or such other purposes as may be approved by the Director of Lands)	
(iii)	Total GFA	Shall not exceed 1,041.49m^2	
(iv)	Building height	No part of any building or structure (except lift machine room, pulley platform, pump room and water tanks or such other roof structures as may be approved by the Director in writing) shall exceed a height of 156m above the HKPD	
(v)	Parking requirement	Car parking space for the parking of motor vehicles at the rate of not less than one space for each flat or not less than one space per 100m^2 of GFA (those car ports to meet the minimum requirement will be exempted from GFA calculation)	
(vi)	No guarantee of any right-of-way	The Government cannot guarantee any right-of-way to the lot and the said	

Comments			Response
		Lessee will accordingly have to make his own arrangements for acquiring such right-of-way	
(vii)	Design and disposition clause		
(viii)	Compliance with Town Planning Ordinance		
(ix)	Watchmen's or caretakers' office and quarters (exempted from GFA calculation)		
5.	With the salient lease conditions of the Lots summarized in para. 1 above, the Applicant shall rectify the statement in para. 2.2.1 of the Supporting Planning Statement ("the SPS") which stated that "*All the lots ..... are held under a virtually unrestricted lease.....*" as IL 8314 and IL 2387 S.A RP are not held under virtually unrestricted leases.		Paragraph 2.2.1 of the Supporting Planning Statement has been revised accordingly.
6.	The Applicant shall clarify the respective total GFAs and site coverages of Tower 1 (i.e. the building(s) at 1 & 1A Kotewall Road) and Tower 2 (i.e. the building(s) at 64 Conduit Road) of the Proposed Development Scheme at Appendix 1 of the SPS for compliance checking under lease.		The respective total GFA and site coverage of Tower 1 and Tower 2 have been incorporated in Table 3.1 of the Supporting Planning Statement (**Appendix I** refers).
7.	It is noted that part(s) of Tower 1 (including some parking spaces) of the Proposed Development Scheme at Appendix 1 of the SPS will be built within the lot boundary of IL 8314 and the Applicant shall demonstrate compliance with the roofed-over area, building height and no vehicular access restrictions under the lease conditions of IL 8314.		Noted. Building structures of Tower 1 to be erected on the IL 8314 have complied with the roofed-over area and building height with detailed demonstration provided at the GBP stage. Regarding the layout of the parking spaces, the Applicant notes the restriction and will reshuffle the car parking layout accordingly at the detailed design stage.

Comments		Response
8.	It is noted that Tower 2 (including the covered carparks and the lift tower) of the Proposed Development Scheme at Appendix 1 of the SPS slightly encroaches upon IL 946 S.B ss.1 and the Applicant shall demonstrate compliance with the "type of building" restriction under the lease conditions of IL 2387 S.A RP.	Justifications will be provided at GBP stage.
9.	It is noted that part(s) of the OZP-Compliant Scheme for 1 & 1A Kotewall Road (including some parking spaces) at Appendix 2 of the SPS will be built within the lot boundary of IL 8314. Similarly, the Applicant shall demonstrate compliance with the roofed-over area, building height and no vehicular access restrictions under the lease conditions of IL 8314.	Please note that the OZP-Compliant Scheme only demonstrates a hypothetical development scheme that is allowable under the OZP for comparison purpose.
10.	The OZP-Compliant Scheme for 64 Conduit Road at Appendix 2 of the SPS, which comprises a building containing 6 storeys of flats over one-storey of carports and a standalone new escalator, is in breach of the no. of storeys and "type of building" restrictions under the lease of IL 2387 S.A RP.	Please note that the OZP-Compliant Scheme only demonstrates a hypothetical development scheme that is allowable under the OZP for comparison purpose.
11.	Similarly, the Applicant shall clarify the respective total GFAs and site coverages of both OZP-Compliant Schemes at Appendix 2 of the SPS for compliance checking under lease.	Respective total GFA and site coverage of the OZP-Compliant Scheme has been incorporated in Table 3.4 (**Appendix I** refers).
12.	The total site area of the Lots of 1,674.6m² as quoted by the Applicant is subject to further verification.	Noted.

Comments		Response
13.	The Applicant shall rectify the total site area, domestic plot ratio and domestic GFA in Table 3.4 of the SPS, which were erroneously interchanged between Tower 1 and Tower 2.	Table 3.4 has been revised accordingly (**Appendix I** refers).
14.	The Applicant shall provide a plan showing the location of the sheltered minibus stop on the G/F of Tower 2 with access for the general public as proposed under paras. 3.3.4 and 4.2.6 of the SPS.	After careful consideration of technical feasibility, the Applicant will not propose a sheltered minibus station at this stage. Relevant sections have been removed. The Applicant will further explore any other possible improvement measures.
15.	Comments on the design and disposition of the Proposed Development Scheme at Appendix 1 of the SPS are hereby reserved, which will be considered during the building plan submission stage.	Noted.
16.	I shall defer to other relevant departments to comment on the technical assessments at Appendices 3 to 9 of the SPS, which are technical in nature.	Noted.
17.	Please note that the comments given above are not exhaustive and my comments are hereby reserved upon receipt of further information/clarifications on the planning application.	Noted.

Consolidated by: **KTA Planning Limited**
Date: **31 August 2026**