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**Attachment 1**

**Responses to Comments Table**

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## **Table of Contents**

### **Responses to Departmental Comments**

	Page
1. District Planning Office/ Sai Kung & Islands, Planning Department	1
2. Civil Aviation Department	5
3. Transport Department	6
4. Drainage Services Department	6
5. Electrical and Mechanical Services Department	7
6. Fire Services Department	7

	Departmental Comments	Responses to Comments
1.	<b>Comments of District Planning Office/ Sai Kung &amp; Islands, Planning Department</b>	
1.1	<p><u>General Comments</u></p> <p>According to the Notes of the approved Tung Chung Extension Area Outline Zoning Plan No. S/I-TCE/2 (the OZP), minor relaxation of Building Height (BH) restrictions of "R(B)3" zone may be considered by the Town Planning Board on application under section 16 of the Town Planning Ordinance <b>based on a development proposal with strong individual merits for the development proposal.</b> The submissions indicate that the application for relaxing BH restrictions involves not only converting a single basement parking level into a two-storey above-ground parking podium but also includes alterations to the site formation level. This allows for a more relaxed floor-to-floor height between 3.3m and 3.5m for domestic storeys, a 2.3m transfer plate, as well as additional E&amp;M facilities within the parking podium. While the recent government initiative from DEVB in relation to above-ground carpark podiums may serve as justification for the resulting height from the conversion, the justifications related to the additional parking floor, layout changes (such as non-domestic uses like lift lobbies and a clubhouse) and extra E&amp;M provisions to support residential development and EV charging are weak and lack sufficient design merits.</p>	<p>Noted. Please refer to the revised set of drawings, development schedule and supplementary drawings for the Proposed Scheme, which further elaborate on the design merits and justifications of the Proposed Scheme <b>(see Attachments 2 and 3).</b></p>
1.2	<p>In addition to providing strong justifications beyond those related to converting the basement carpark to an aboveground with individual planning merits for the additional changes as stated above, the applicant is suggested to review the scheme to strengthen its individual merits and planning gains. This could involve exploring the potential for further site coverage reduction by setting the podium back from the NBAs or further setback from the waterfront possibility for an enhanced greening ratio, and etc.</p>	<p>Please note that while there is no setback requirement imposed under the OZP, additional podium setback of about 6m to 7.45m along the north-western boundary facing the waterfront promenade has been incorporated in the Proposed Scheme to help reduce the visual bulk. Besides, as required under lease, there are two strips of non-building area (NBA) designated along the north-eastern and south-western boundary of the Application Site. The Applicant has taken the initiative to create a further setback of about 7.3m at G/F level with high headroom abutting the north-eastern NBA. The further setback from NBA can enhance the openness through the Application Site between waterfront promenade and Wui Tung Street.</p>

	<b>Departmental Comments</b>	<b>Responses to Comments</b>
1.2 (Con't)		<p>For greenery provision, in accordance with the requirement of the Sustainable Building Design Guidelines (PNAP APP-152), the overall minimum site coverage of greenery required for the entire Application Site is 20%.</p> <p>Given that the two strips of non-building area (NBA) along the northeastern and southwestern boundary will be surrendered back to the Government, in order not to reduce the overall greenery provision for the Application Site, the Applicant has distributed all the proposed greenery within the development site area (i.e. area outside NBAs). The greenery provision within the development site area is therefore able to achieve a coverage of not less than 23%. Besides, according to the lease, the Applicant will also need to provide landscaping provision within the two NBAs, subject to liaison and agreement with relevant government departments at detailed design stage. In turn, the two strips of NBAs might be able to provide additional greenery provision on top of those within the development site area, which will further enhance the streetscape of the Application Site.</p> <p>Please also refer to the revised set of drawings, development schedule and supplementary drawings for the Proposed Scheme in <b>Attachments 2 and 3</b> for details.</p>

	<b>Departmental Comments</b>	<b>Responses to Comments</b>
	<p><u>Specific Comments</u></p>	
1.3	<p>The justifications provided in the Supplementary Planning Statement for the application for minor relaxation of building height from 70mPD to 76.9mPD at the site are generally based on a comparison with an approved GBP that includes a basement carpark. It is unjustifiable to consider the proposed BH relaxation is acceptable due to its largely conformation of the approved GBP as this scheme is just one of many development options for the proposed residential development. Therefore, the applicant should strengthen the individual merits and planning gains associated with the requested minor BH relaxation for the Site.</p>	<p>Noted. The revised set of drawings, development schedule and supplementary drawings for the Proposed Scheme have been prepared in <b>Attachments 2 and 3</b> to further depict the design merits and justifications of the Proposed Scheme with minor relaxation of BH height restriction for incorporation of a 2-storey above ground carpark, without comparing with the Approved GBP Scheme with basement carpark design.</p> <p>It should also be noted that, upon further review on site formation level in relation to flood level and abutting street level, the site formation level has been reduced by 0.4m. The maximum BH for the Proposed Scheme has also been reduced to 76.5mPD accordingly.</p>
1.4	<p>Please provide compelling justifications for the 50% increase in no. of storeys for the proposed car parking provision, given that this scheme maintains largely the same no. of parking spaces (i.e. a total of 202 car parking spaces).</p>	<p>Please note that, with basement carpark design, apart from avoiding encroachment into the two NBAs and unexcavated areas reserved along the site boundaries, the area available for the floor plate of carparking area could cover majority of the Application Site. However, for the Proposed Scheme with above ground carpark design, the area available for carpark is constrained by other provisions above ground, such as the necessary EVA arrangement for firefighting, ingress/egress points, etc. These facilities would not be provided at basement level. As a result, it is not feasible to accommodate all of the 202 nos. of carparking spaces on a single floor (i.e. G/F). Therefore, some of the required carparking spaces would have to be accommodated on another floor (i.e. 1/F). Accordingly, a 2-storey above ground carpark is required for the Proposed Scheme.</p> <p>Please also refer to the revised set of drawings, development schedule and supplementary drawings for the Proposed Scheme in <b>Attachments 2 and 3</b> for details.</p>

	<b>Departmental Comments</b>	<b>Responses to Comments</b>
1.5	<p>In view of the increase in the building bulk by converting the car parking provisions from the basement to aboveground podiums, please clarify whether the proposed site coverage and floor-to-floor heights for the residential and podium floors represent the most sensible development option. If so, please provide justifications explaining how the proposed site coverage would result in a less intrusive building bulk for the proposed residential development at the site.</p>	<p>Please note that the Applicant has already paid his best effort to reduce site coverage with justifications provided for the floor-to-floor height as well as layout arrangements to minimise the building bulk.</p> <p>Please also refer to the revised set of drawings, development schedule and supplementary drawings for the Proposed Scheme in <b>Attachments 2 and 3</b> for details.</p>
1.6	<p>The existing site formation level of the site is about +5.4mPD to +5.7mPD. According to the submitted floor plans, the proposed site formation level at G/F (i.e. +7.2mPD) exceeds the existing site formation level for the residential development. Please clarify how the proposed site formation level of +7.2mPD (including the site formation levels for the carparking floor and EVA/driveway) is technically justified from an engineering perspective.</p>	<p>The Application Site is located at a waterfront location. In view of the extreme weather condition Hong Kong experienced in the recent years, minimising flood risk is one of the major concerns when formulating the Proposed Scheme. According to the 50-year storm with climate change projected to the end of 21<sup>st</sup> Century, the flood level of the Tung Chung area is about 5.99mPD (based on the nearest Shek Pik Tide gauge). To also tie in with the street level of Wui Tung Street at 6.18mPD, which is also the ingress/egress point of the Application Site, a reasonable site formation level of 6.8mPD is proposed.</p> <p>As compared with the original scheme submitted to the Town Planning Board in January 2026, the site formation level has been reduced from 7.2mPD to 6.8mPD.</p> <p>Please also refer to the revised set of drawings, development schedule and supplementary drawings for the Proposed Scheme in <b>Attachments 2 and 3</b> for details.</p>
1.7	<p>Please clarify on whether the proposed BH for the residential development would be subject to any aircraft noise impact.</p>	<p>Please refer to our responses on Items 2.3 and 2.4 of this RtoC table below.</p>

	<b>Departmental Comments</b>	<b>Responses to Comments</b>
<b>2.</b>	<b>Comments of Civil Aviation Department</b>	
2.1  2.2  2.3	<p><u>Airport Height Restriction and Lighting</u></p> <p>AHR must be strictly observed at all times. No part of any structures and equipment used during construction or for maintenance after the completion of the construction works shall exceed the AHR limits; and</p> <p>All lights, including those installed for construction works, shall not form a source of glare or in any way affect pilots in flight and air traffic controllers in the Air Traffic Control Towers.</p> <p><u>Aircraft / Helicopter Noise</u></p> <p>In view that the subject site is located in close proximity to the Hong Kong International Airport (HKIA) and helicopter holding areas/flying routes, it is expected that the proposed development will be subject to aircraft/helicopter noise disturbances, even though the site is situated outside the Noise Exposure Forecast (NEF) 25 contour of the HKIA. Such potential noise disturbance is especially pronounced during the night-time period when the ambient background noise levels are low. In fact, we are aware of aircraft noise complaints lodged by the residents in Tung Chung from time to time.</p>	<p>The Applicant will take into account the airport height restriction (AHR) and ensure that no part of the building and associated construction machinery will exceed the ARH limits.</p> <p>All lights of the Proposed Development, including those installed for construction works, or for maintenance after the construction works, would not be projected in a way that form a source of glare or in any way affecting pilots in flight and air traffic control towers at all time.</p> <p>According to the approved EIA report for Expansion of Hong Kong International Airport into a Three-Runway System (Ref.: AEIAR-185/2014), the Application Site is located outside the Noise Exposure Forecast (NEF) 25 Contour of the Hong Kong International Airport (HKIA). On the other hand, it is also noted that the Application Site is located in close proximity to the HKIA and helicopter holding areas/flying routes, and therefore may be subject to aircraft/ helicopter noise disturbances.</p>

	<b>Departmental Comments</b>	<b>Responses to Comments</b>
2.4	It is noted that the enclosed Planning Statement does not include any description or environmental assessment related to aircraft noise impact. It is therefore suggested that the expected aircraft noise situation should be reflected in the aforesaid document. In this connection, implementation of appropriate noise mitigation measures (e.g. use of acoustic insulation, etc.) should be considered in order to minimize the aircraft noise impact on future occupants. Also, we suggest that perspective buyers or future residents should be duly alerted of the potential aircraft noise impact.	Under such circumstances, better insulation would be considered for the proposed residential development at detailed design stage subject to further review and study. In future, the perspective buyers or future residents will also be duly informed of such potential noise impact, e.g. via sales brochure.
<b>3.</b>	<b>Comments of Transport Department</b>	
3.1	Please confirm that there is (i) no change in GFA together with no change in flat units and size; (ii) no reduction of parking spaces; and (iii) no change in run-in/out compared to the approved GBP scheme.	When compared with the Approved GBP Scheme, the Proposed Scheme has (i) no change in GFA; (ii) no change in no. of units and average flat size; (iii) no reduction of parking spaces; and (iv) no change in run-in/out.
<b>4.</b>	<b>Comments of Drainage Services Department</b>	
4.1	Please be reminded that no structure including temporary or movable should be erected on top or within the Drainage Reserve Area. This Division shall have free access at all time to the Drainage Reserve Area (including headroom) for the purpose of laying, repairing and maintaining drains, sewers and all other services across through or under it which may require.	Noted.

	<b>Departmental Comments</b>	<b>Responses to Comments</b>
<b>5.</b>	<b>Comments of Electrical and Mechanical Services Department</b>	
	<u>Town Gas Safety</u>	
5.1	Please be informed that an intermediate pressure underground town gas pipeline may be present in the area.	Noted.
5.2	The project proponent/consultant/works contractor shall liaise with The Hong Kong and China Gas Company Limited in respect of the exact locations of existing or planned gas pipes/gas installations in the vicinity of the works site and any required minimum set back distance away from them during the design and construction stages of development.	Noted.
5.3	The project proponent/consultant/works contractor is required to observe the Electrical and Mechanical Services Department's requirements on the "Avoidance of Damage to Gas Pipes 2nd Edition" for reference. The webpage address is: <a href="https://www.emsd.gov.hk/filemanager/en/content_286/CoP_gas_pipes_2nd_(Eng).pdf">https://www.emsd.gov.hk/filemanager/en/content_286/CoP_gas_pipes_2nd_(Eng).pdf</a>	Noted.
<b>6.</b>	<b>Comments of Fire Services Department</b>	
6.1	Detailed fire safety requirements will be formulated upon receipt of a formal submission of Short Term Tenancy or Short Term Waiver, general building plans or referral of the application via the relevant licensing authority.	Noted.
6.2	The provision of emergency vehicular access in the subject work shall comply with the requirements as stipulated in Section 6, Part D of the Code of Practice for Fire Safety in Buildings 2011.	Noted.