

Annex A

*Scheme Clarifications - Technical Clarifications about the major differences
between the PAS and the Present Scheme*

SUPPLEMENTARY CLARIFICATIONS FOR A/SK-TLS/64

A. Technical Problems upon Detailed Design Stage

Undermined the Function of Topographical Survey

A.1. Soon after the approval of the previous planning application under Application No. A/SK-TLS/56 (hereinafter called the “PAS”) on 13.12.2019, the Applicant then appointed a new Project Team to prepare a detailed building design to implement the PAS. A topographical survey of the Subject Site and its immediately surrounding area was subsequently conducted thereafter.

A.2. The findings of the topographical survey have revealed that the site level difference between Ka Shue Road and the existing ground levels of the Applicant Site are greater than the expectations (i.e. from about 7.17m in the north and about 3.31m in the south, as shown in **Figure F1**). The substantial site level differences have resulted in causing serious difficulties for the PAS to comply with: (i) CLP’s ‘Code of Practice 101 for Distribution Substation Design (Version 15)’ (“CoP 101”); and (ii) the PAS’s non-compliance with Building Regulations.

(1) Compliance of the Building Regulations for Helical Car Ramp

A.3. Based on the results of the topographical survey, a holistic review of the PAS was conducted. As shown in **Figure F2**, multiple concerns and technical difficulties have been identified.

A.4. Insufficient turning radius of the driveway ramp of PAS as shown in **Figure F2**, according to the Access Roads/Driveways of PNAP APP-111¹ ‘Design of Car Parks and Loading/Unloading Facilities’. The minimum inner turning radius of a helical ramp should be not less than 3.6m for private cars. Therefore, the PAS scheme is unable to comply with this statutory building requirement.

A.5. The feasibility of a minor revision of the ramp in the PAS was also conducted, however, there will be insufficient headroom to comply with PNAP APP-111 and a reduction of 3 carparking spaces was also identified. As a result, the whole PAS scheme is unable to comply with the current car parking provision set out in the Hong Kong Planning

¹ <https://www.bd.gov.hk/doc/en/resources/codes-and-references/practice-notes-and-circular-letters/pnap/APP/APP111.pdf>

Standards and Guidelines², and with a reduction of these 3 carparking spaces, the PAS cannot fulfil the carparking provision requirements stipulated in the Special Conditions under lease.

(2) Compliance of the Building Regulations for rear end building setback

- A.6. The schematic Master Layout Plan of the PAS was failed to comply with the Building (Planning) Regulations 25(2) to provide a building setback of 1.5m at the rear boundary of the site, as shown in **Figure F3**. It should also be noted that the proposed 5m building separation between Tower 1 (“T1”) and Tower 2 (“T2”) (in the PAS) would be unachievable due to the repositioned T1 in the PAS as a way to comply with the provision of 1.5m rear boundary setback as stipulated in B(P)R 25 (**Figure F3**).
- A.7. In order to comply with the Building (Planning) Regulations 25(2), T1 has been repositioned to comply with such requirement taking to account the provision of a minimum of 5m building separation between T1 and T2 (**Figure F3**).

(3) Compliance of the CoP 101

- A.8. Upon the approval of the application, the Project Team liaised with CLP regarding the location and technical requirements of the proposed transformer room. Based on the original scheme of the PAS, the feasibility of the proposed new TX Room at G/F in T1 is considered not acceptable as the cable lead-in duct is excessively long (i.e. 29m) and too away from major road (i.e. Ka Shue Road) as shown in **Figure F4**.
- A.9. Furthermore, in its replies, CLP found the proposed location to be non-compliant with ‘Code of Practice 101 for Distribution Substation Design (Version 15)’³ (“**CoP 101**”) and outlined clearly that the proposed development should, among other requirements, comply with the following:
- Locational requirements for the substation to be located at the periphery of the building (**Para. 5.1.2 of CoP 101**);
 - Minimum headroom of 3.6m (**Para. 5.1.5 of CoP 101**);

² https://www.pland.gov.hk/file/tech_doc/hkpsg/sum/pdf/sum_ch8_en.pdf

³ <https://www.clp.com.hk/content/dam/clphk/documents/customer-service-site/open-and-close-account-site/cop-101-distribution-substation-design-site/CoPp101%20version%2015%20black%20letters.pdf>

- A concrete slab with thickness of 1m atop the TX room (**Para. 5.1.7 of CoP 101**);
- Provision of compliant cable trench for cable lead-in (*including invert level of 1050mm cable trench*) (**Para. 5.5 of CoP 101**); and
- Gentle ramp with gradient of not greater than 1:12 for delivery of a new transformer (**Para. 5.12 of CoP 101 and Appendix A**).

A.10. Having considered the specific location requirements set out in CLP's "Para. 5.1.2 of CoP 101" (**Appendix A**), the Project Team then recommends to relocate the new TX Room from G/F of T1 in the PAS to G/F of T2 in the present scheme, as shown in **Figure F4 and Figure F5**.

A.11. The new building height of 4.8m at LG/F is considered to be a reasonable floor height when a 1.25m cable draw pit duct including a 0.15m ancillary structure slab was required to be connected to the trench of the TX Room at G/F, a 0.5m E&M zone and a 0.6m structural beam. As shown in **Figure F5**, the remaining headroom for the LG/F of 2.45m would only be slightly above the statutory requirements set out in Cap. 123G.

A.12. The new LG/F height is necessary due to the area dedicated to the E&M Zone as shown in **Figure 13a and Figure 19a**. Soil & Waste pipes serving the Towers are routed at high level of LG/F towards Septic Tank Room and require up to 0.8m height to allow for the required fall of the pipes via gravity. As shown in **Figure 13a**, the Soil & Waste pipes have to pass under structural beams (0.6m (H)) of the Planter Areas / Private Garden Areas (1.5m (H)) above, while preserving the requisite minimum height for Car Parking Area (2.4m) and floor finishing (0.1m), requiring 5.4m in total. Hence the proposed height of 4.8m is justified.

A.13. As shown in **Figure F5**, a bare minimum building height ("BH") of 4.8m is required for the LG/F of T2. When compared to that in the PAS, it represents an increase of 0.8m.

A.14. The results of the above multiplying overlooked yet inter-locking technical problems have demonstrated that the PAS scheme is unable to be implemented simply with minor design amendments in practice. Further increase in BH of the development is unavoidable to ensure it is practically resolved all these inter-locking technical problems.

A.15. **Table A** shows the changes in key development parameters between the PAS, the original proposed scheme and the present revised scheme.

Table A Comparison of Key Development Parameters between the Previous Approved Scheme (“PAS”), the Original Proposed Scheme and the Present Revised Scheme

Development Parameters	A/SK-TLS/56 PAS (A)	A/SK-TLS/64 Original Scheme (B)	A/SK-TLS/64 (F11) Present Scheme (C)	Difference (C)-(A)
Application Site (m ²)	1,572	1,719	1,719	+ 147 m ²
“R(C)1” Zone (m ²)	1,572	1,572	1,572	Unchanged
“GB” Zone (m ²)	-	147	147	+ 147 m ²
GFA (m ²)	2,357	2,357	2,357	Unchanged
Plot Ratio ^{#1}	1.5	1.5	1.5	Unchanged
Site Coverage ^{#1}	About 33.911%	About 37%	About 34.034%	+ 0.123%
No. of Storeys	5 storeys over 1 basement level	5 storeys over 1 basement level	5 storeys over 1 basement level	Unchanged
Mean Site Formation Level (mPD) ^{#2}	Tower 1: 227.0 ^{#3} Tower 2: 227.0 ^{#3}	Tower 1: 227.0 Tower 2: 227.3	Tower 1: 227.0 Tower 2: 227.0	Tower 1: Unchanged Tower 2: Unchanged
Absolute Building Height ^{#4} (m)	19 ^{#3}	Tower 1: 22 Tower 2: 21.7	Tower 1: 21.2 Tower 2: 21.2	Tower 1: + 2.2m Tower 2: + 2.2m
Floor Heights Breakdown (m) [4/F is omitted]				
LG/F (basement)	4	5	4.8 ^{#5}	+ 0.8m
G/F	3	3.25	3.25	+ 0.25m
1/F	3	3.25	3.25	+ 0.25m
2/F	3	3.25	3.25	+ 0.25m
3/F	3	3.25	3.25	+ 0.25m
5/F	3	3.4	3.4	+0.4m
Building Height ^{#4} (mPD)	246 ^{#3}	249	248.2	+ 2.2m
No. of Blocks	2	2	2	Unchanged
No of Units	14	14	14	Unchanged
Average Flat Size	About 160 m ²	About 168.36 m ²	About 168.36 m ²	+8.36 m ²
Estimated Persons	-	About 38	About 38	Not Applicable
Greening Ratio (%)	-	About 20.27%	About 21.73%	Not Applicable
Greenery Provision	About 368 m ²	About 349 m ²	About 374 m ²	+ 6 m ²
Total Parking Space Provisions	27 private car parking spaces (including 1 for disabled and 2 for visitors) 3 motorcycle parking spaces	26 private car parking spaces (including 1 for disabled and 2 for visitors) ^{#6} 3 motorcycle parking spaces	26 private car parking spaces (including 1 for disabled and 2 for visitors) ^{#6} 3 motorcycle parking spaces	- 1 ^{#6} Unchanged

	1 L/UL bay for goods vehicles	1 L/UL bay for goods vehicles	1 L/UL bay for goods vehicles	Unchanged
--	-------------------------------	-------------------------------	-------------------------------	-----------

^{#1} Based on land area of “R(C)1” site only; ^{#2} Calculation based on JPN No. 5; ^{#3} Based on TPB Paper No. A/SK-TLS/56B; ^{#4} Up to the main roof level; ^{#5} Bare minimum floor height; ^{#6} Provision complies with requirements under lease

B. ADDITIONAL ACHIEVABLE GAINS

Commitment to Planning Merits in PAS

B.1. Despite the technical difficulties, the Applicant has been actively seeking design solutions to maintain the planning merits previously committed in the PAS, under the present scheme, the Project Team has made its best effort to maintain the 5m building gap between T1 and T2, as shown in **Figure F3**, for air ventilation while complying with building regulations, and also to provide an additional building setback from Ka Shue Road.

B.2. **Figure F6** is the artist impression diagram of the proposed building setback (currently not less than 2.5m wide) from Ka Shue Road illustrating to improve visual amenity and natural wind penetration along Ka Shue Road.

C. REVISED GREENING CALCULATION

C.1. In the present scheme, the Project Team has made its best effort to provide as much greenery areas as possible at human scale levels instead of rooftop landscaping treatments proposed in the PAS. The intention of this is not only to enhance the on-site quality of well-being for the end-users, but is also to improving the overall visual amenity of the redevelopment scheme as well as for public enjoyment. Substantial rooftop greenery areas in the PAS have been redistributed at the human scale level in the present scheme.

C.2. As a result, a total greenery area up to about 374m² (or about 21.73% green ratio) is proposed in the present revised scheme. Compared to that in the PAS, this total represents a slight increase by 6m² in area. It represents a great improvement to the PAS scheme. It is also a design merit in the present scheme.

More Roadside Ventilation, Greening and Biodiversity

C.3. In the present scheme, the Project Team proposes to make the best use of the 1.5m boundary setback area alongside Ka Shue Road for provision of extensive landscaping treatments to improve its existing local visual amenity and the biodiversity (**Figures**

F6 – F7). **Figures 8** is a photomontage showing the likely visual effect to be contributed at this part of Ka Shue Road via the present scheme in comparison with its existing conditions.

C.4. To further enhance the natural wind penetration onto Ka Shue Road without jeopardizing the privacy of the on-site residential units with windows fronting Ka Shue Road, the upper portion of joining areas between boundary wall partitions (i.e. portion above 1.6m measured from ground level) will be in the form of grille, as shown in **Figure F7**.

C.5. To offer an enhancement on local biodiversity in the area, several selected plant species which could provide foods and shelter for the local wildlife/ecosystem are also added within the Subject Site (detailed in the revised **Appendix II - Landscape Proposal**).

More Credits for Gold BEAM Plus Certification

C.6. In the present scheme, the Applicant has actively made an initiative to upgrade the quality of building development at least up to a GOLD BEAM Plus Certification instead of UNCLASSIFIED project under the PAS.

C.7. According to Credit Summary_NB v2 of the BEAM Plus (**Figure F9**), the higher the floor ceiling of a domestic unit, the greater the performance of the internal ventilation effect will be resulted in. The proposed high ceiling apartments are also one of the green building considerations to improve the internal living quality in terms well-being. It will very logical to deduce that the higher the floor ceiling in a domestic room, the greater and wider natural daylight penetration will also be resulted in to save energy consumption. Tinted window glasses can be applied when necessary.

D. Aspiration for High-end Apartments

D.1. After further reviewing the unique geographical advantages and the historic background of the Site (as outlined in paragraph 3.9 in the Planning Statement), the Applicant would like to take this opportunity to redevelop the Site into a high-end, high-quality with high ceiling private apartment project to meet the needs of the community.

D.2. According to a further desktop review on the supply of high ceiling apartments/units in Hong Kong between 2019 and 2024 (with reference to the Domestic Occupation

Permits listed in “Monthly Digest”⁴ issued by the Buildings Department and the individual first-hand sales brochures⁵) of all properties with sizes ranged from 900ft² to 2,500ft², the results of this review indicated that 668 units out of 1,696 total surveyed units (contributing to about 33.93%) were in the form of high ceiling units with floor heights equal to or above 3.25m.

D.3. **Table B** summarises the findings of the above review.

Table B – Summary of Similar Flat Size Supplies between 2019 and 2024

A	Total supply of similar flat size between 2019 and 2024	1,696 Units
B	Units with High Ceiling (above 3.25m) between 2019 and 2024	668 Units (33.93%)
C	Average Ceiling Height in (B) above	3.369m

D.4. This, together with the aspirations for high ceiling apartments mentioned in paragraph 5 in the Planning statement, the proposed floor heights of 3.25m (from G/F to 3/F) and 3.4m at 5/F (4/F is omitted) in the present scheme under application are not unreasonable. A set of revised schematic drawings (i.e. **Figures 13a – 22a**) of the present revised scheme is attached.

D.5. **Figure F10** compares the BHs proposed in the PAS and the present scheme. The resultant overall maximum BH at the main roof level in the present scheme is 21.2m (**Figure F10**). With the re-arrangement of the new site formation levels, the absolute BHs proposed in T1 and T2 in the present scheme are both 21.2m.

D.6. **Figure F10** compares the BH proposed in the PAS and the present scheme for easy reference. The proposed BH in the present scheme represents only an increase of 2.2m when compared to that in the PAS [i.e. 0.8m (for LG/F) + (0.25m x 4 from G/F – 3/F) + 0.4m (5/F)]. This is considered minor in nature.

E. Clarifications

⁴ <https://www.bd.gov.hk/en/whats-new/monthly-digests/index.html>

⁵ <https://www.srpe.gov.hk/opip/index.htm>

Long-term M&M Responsibility for On-site “GB” Area

- E.1. In the present scheme, the Applicant intends to include the portion of the on-site “GB” area not only to improve the quality of the existing on-site “GB” area, particularly to tidy up and to replace some broken/damaged trees/vegetation caused by previous typhoon(s), but also with an aim to enhance the local biodiversity via the plantation of various species of new/compensatory trees. Indeed, it further serves to reflect the Applicant’s long-term management and maintenance (“M&M”) responsibility on this on-site “GB” area.

On-site “GB” Area Mainly for New Trees Planting/Soft Landscaping Works

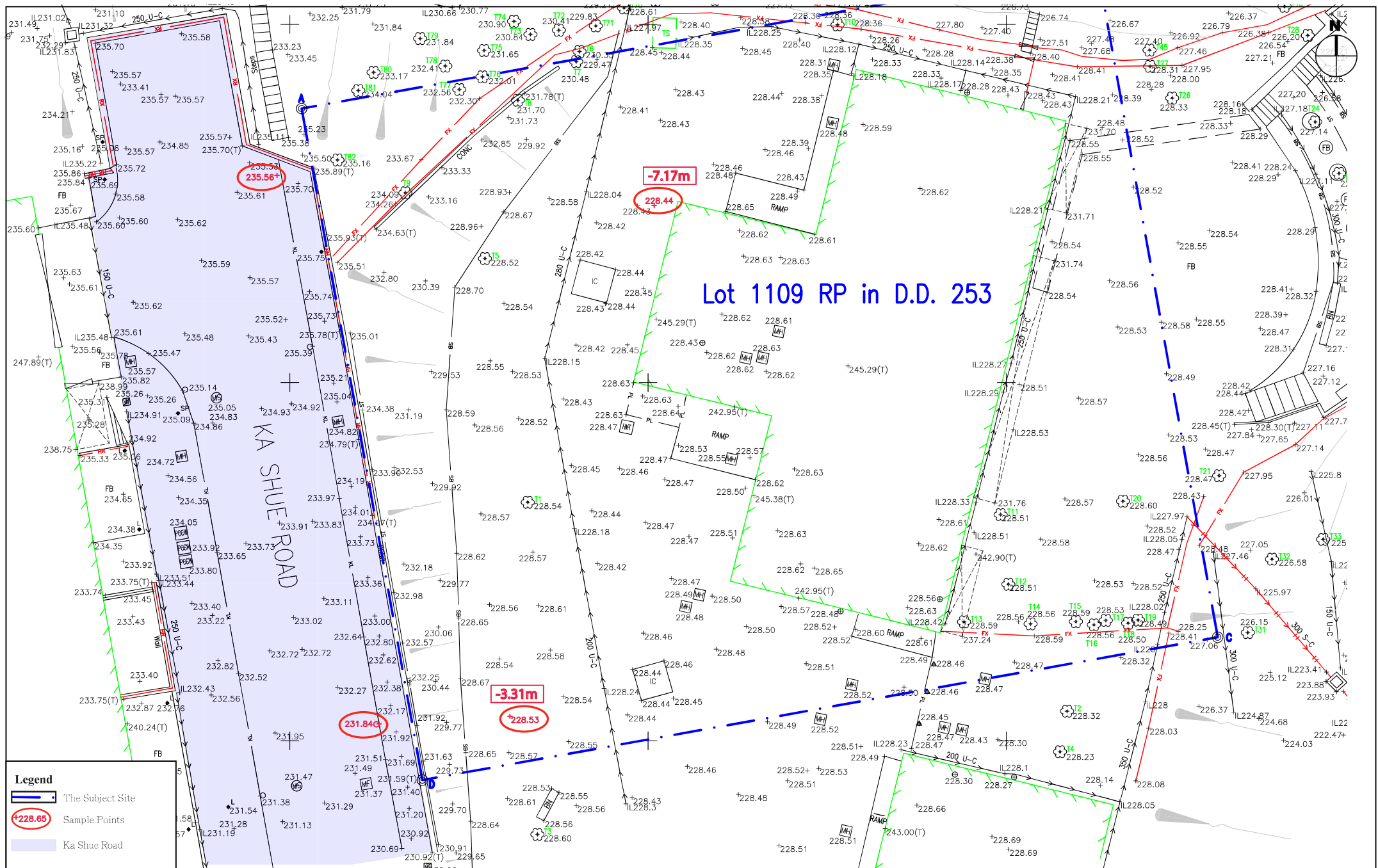
- E.2. The whole piece of the on-site “GB” area is planned mainly for new tree plantings/soft landscaping works purposes, involving digging holes in the ground for tree planting and filling with earth to cover the root balls of those new trees. No site formation and/or building construction works will be carried out within the on-site “GB” area.

Reduction of one car parking space

- E.3. Due to the changes in apartment sizes, a total of 26 carparking spaces are now proposed in the present scheme in accordance with Schedule VI [Clause 36 (a) – (d)] in the Special Conditions under lease (**Appendix A**).

Refinement of Site Coverage Calculation

- E.4. In the present scheme, the Project Team has made its best effort to cut down the overall site coverage to a bare minimum of about 34% within the extent of the “R(C)1” area. **Figure F11** compares the site coverage calculation between the PAS and that in the present revised scheme. Compared to that in the PAS, they are almost the same (i.e. 33.911% in the PAS vs 34% in the present scheme).



弘域城市規劃顧問有限公司
VISION PLANNING CONSULTANTS LTD.

香港北角銀禧街 923 號海明中心 20 樓 C 室
Unit C, 20/F., Seabright Plaza, 9-23 Sheik Street, North Point, Hong Kong.
Tel: (852) 2566 9988 Fax: (852) 2566 9978 E-mail: vision@visionplanning.com.hk

Figure F1

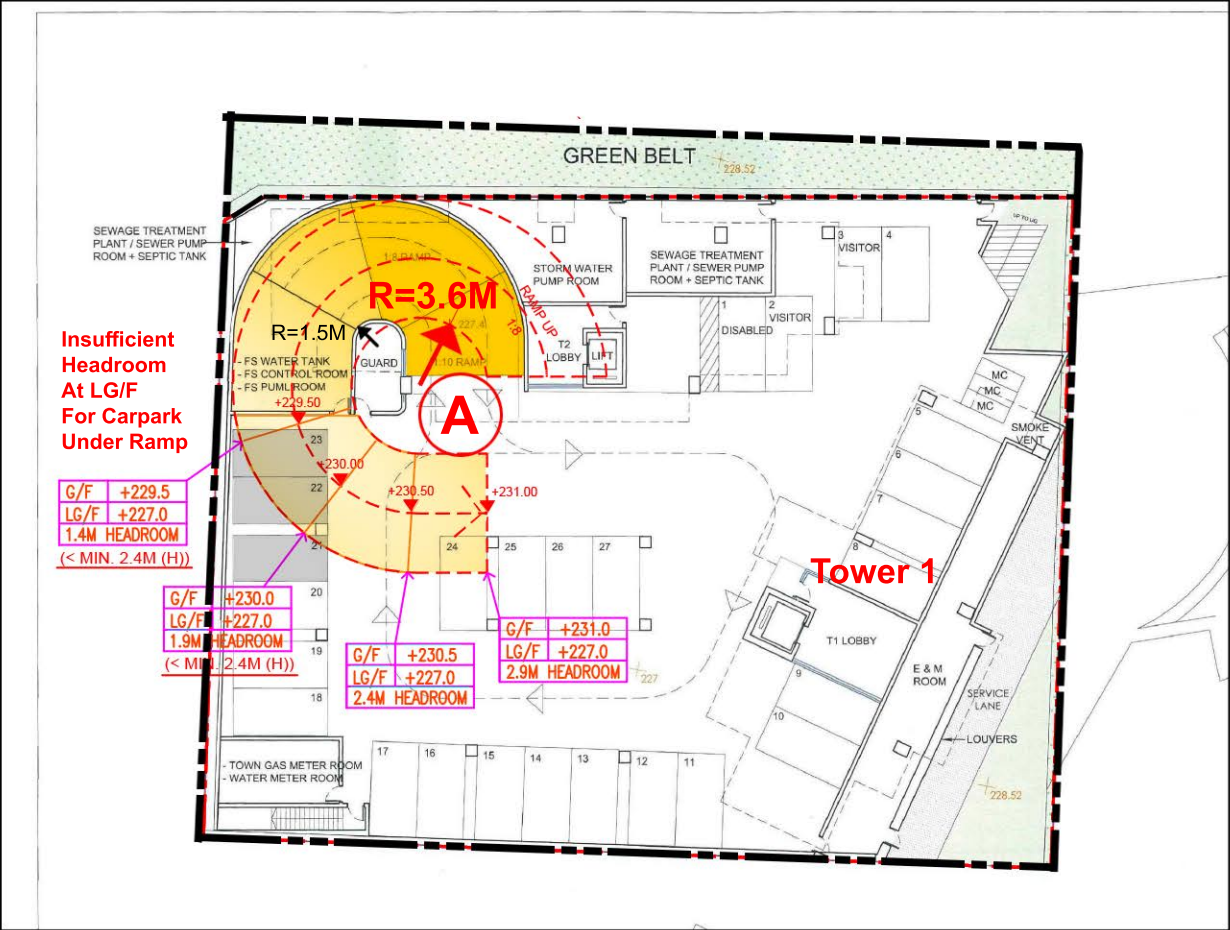
N. T. S.

TECHNICAL DIFFICULTIES

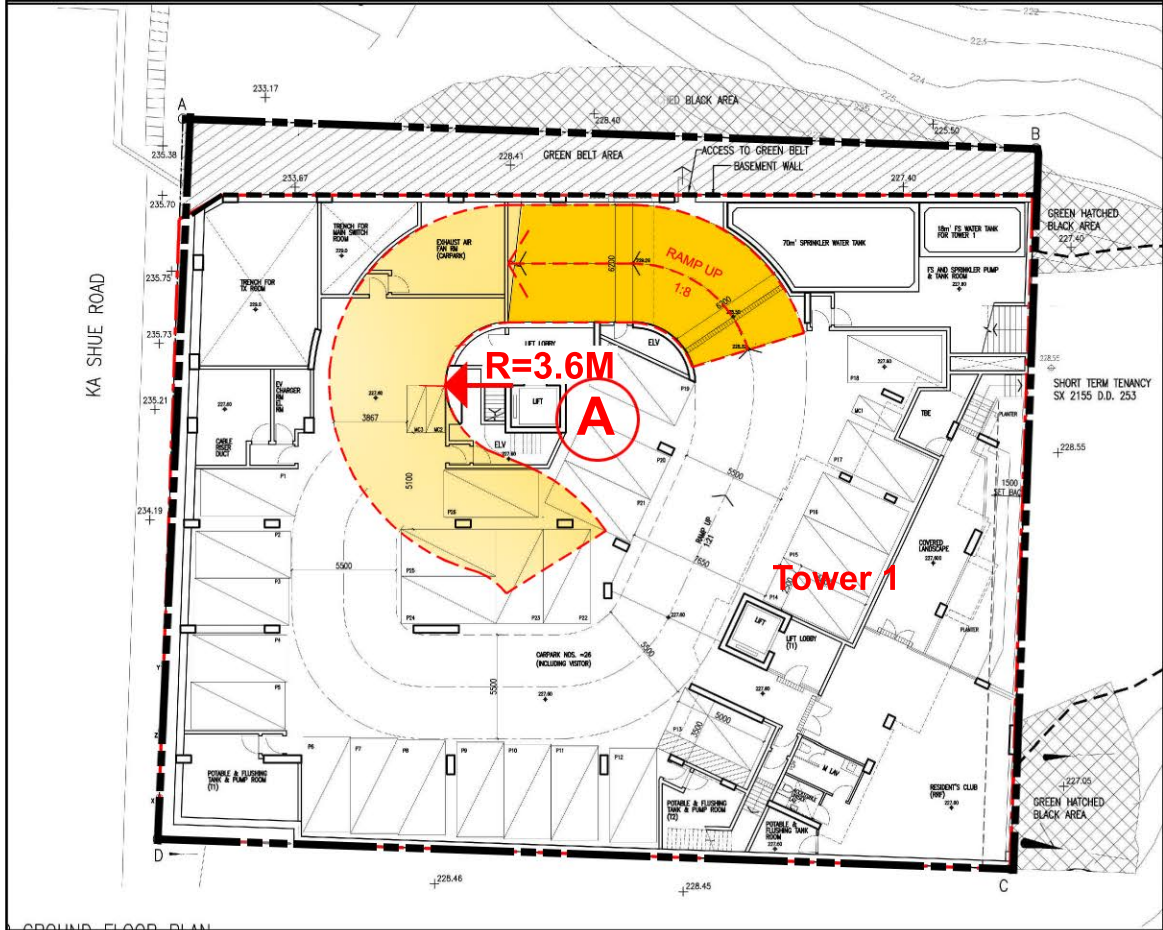
Insufficient Inner Turning Radius;
Car Running Into Opposite Lane Of Ramp

Figure F2

PAS (A/SK-TLS/56)



PRESENT SCHEME (A/SK-TLS/64)



A. Insufficient Inner Turning Radius At Ramp

The Provided Inner Turning Radius is 1.5M, Less than Min. Turning Radius Required For Private Car (3.6M)

Following Correct Ramp Radius in Red Dotted Line, the Structure Adversely Affects the Headroom of Car-parking Area Below, Leading To Insufficient Headroom Resulting In Reduction Of 3 Nos Carparking Spaces

Provided Car Parking	PAS	Present Scheme
Total Carpark	27-3 = 24	26

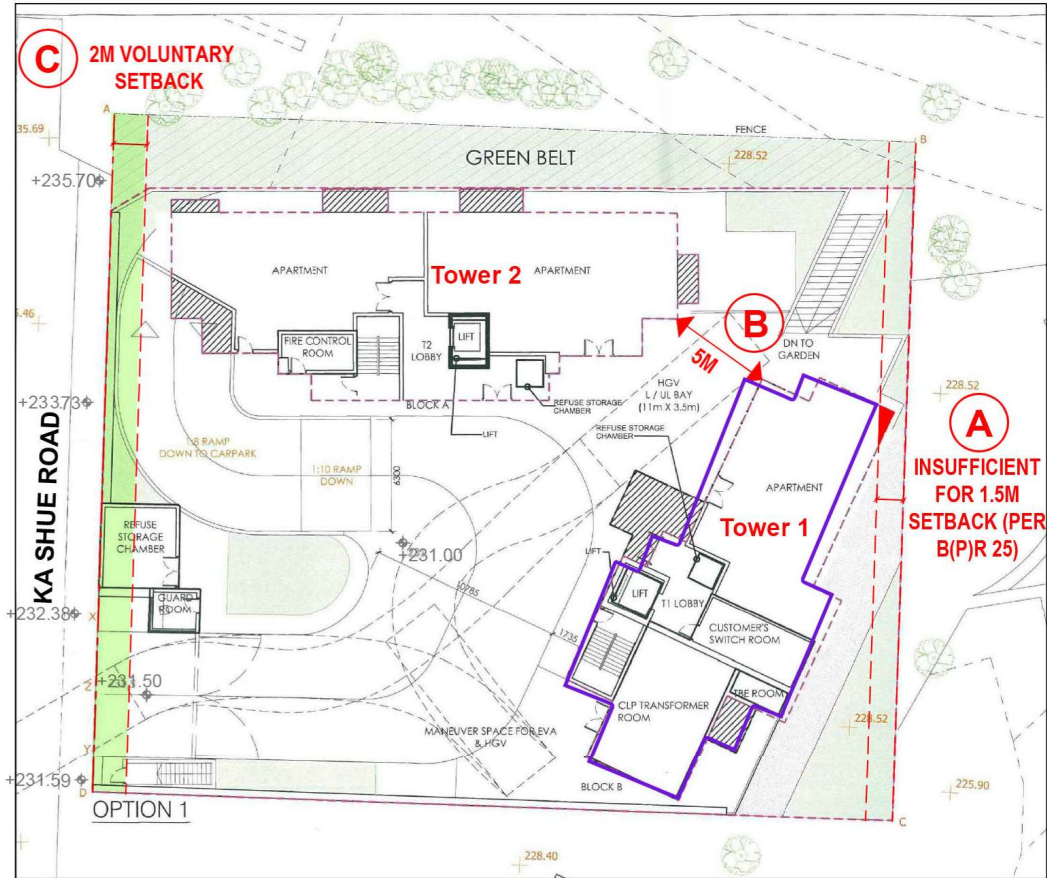
A. Sufficient Inner Turning Radius At Ramp
Now Complies With APP-111 (Min. Inner Radius 3.6M Provided).

DESIGN MERITS

FURTHER SETBACK FROM 2M TO 2.5M

Figure F3

PAS (A/SK-TLS/56)

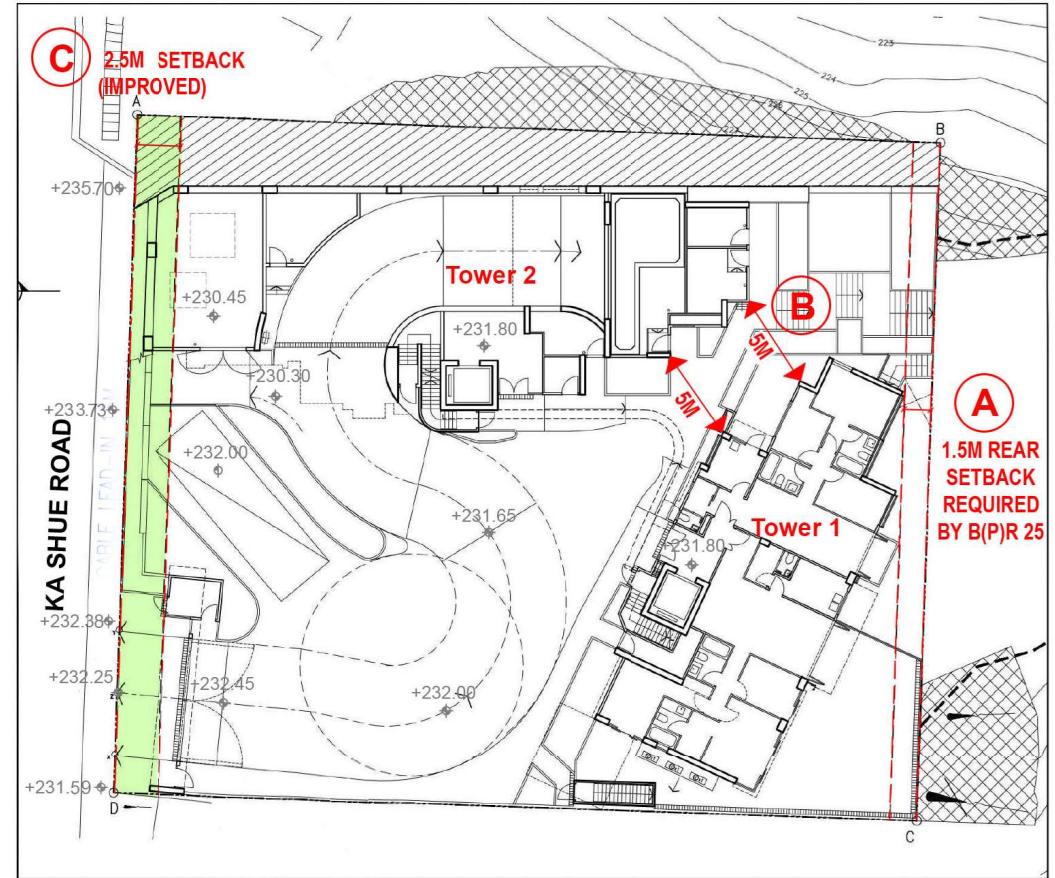


**A. Not Comply With B(P)R25 ,
Setback Minimum Of 1.5M From Rear Boundary Needed**

**B. If Building Shifted ,5M Building Separation Between
Buildings Cannot Be Achieved**

C. 2M Setback Provided In Previous Scheme

PRESENT SCHEME (A/SK-TLS/64)



**A. Complies With B(P)R25 ,
1.5M Rear Boundary Setback Provided.**

**B. 5M Building Separation Maintained,
By Revising the Building Shape
and Internal Layout of Apartments**

C. 2.5M Setback Provided

TECHNICAL DIFFICULTIES

Solutions To Meeting CLP's Requirements

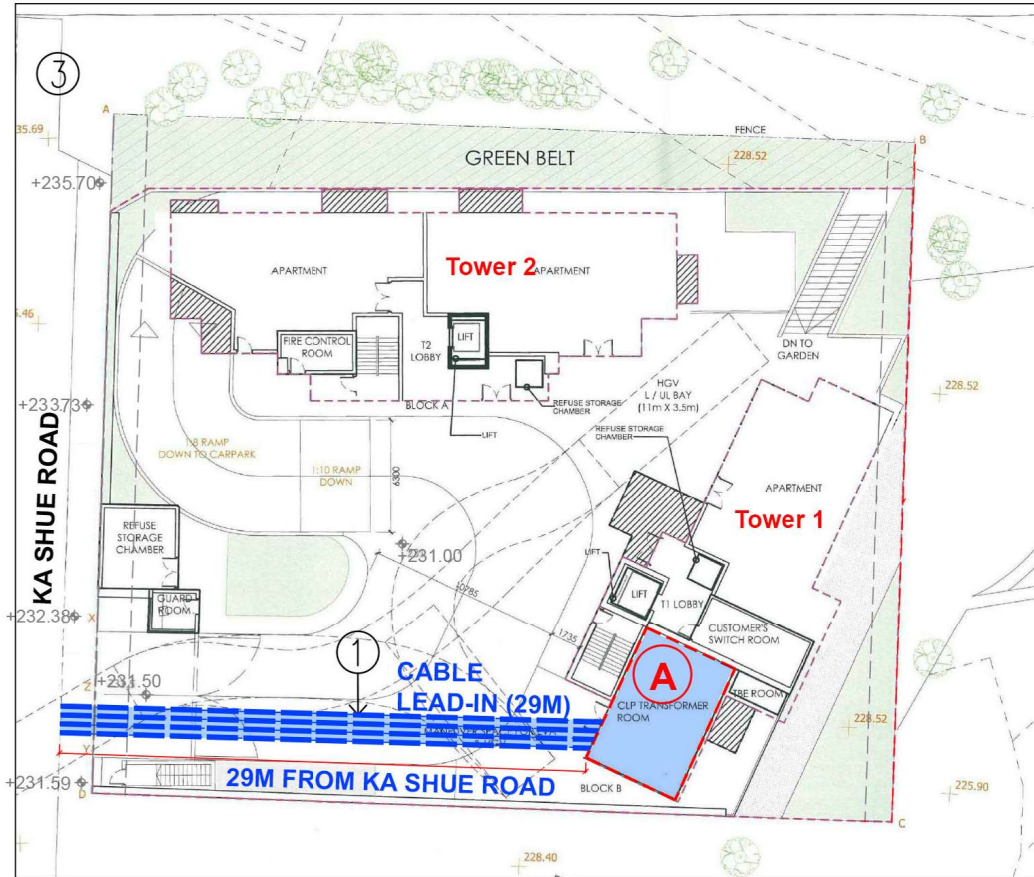
1. The Relocation Of The Transformer Room

2. The Increased Height Of The LG/F

3. The Revised Levels Of The Transformer Room Ceiling Slab, And The Raised Level Of 1/F Residential Flats.

Figure F4

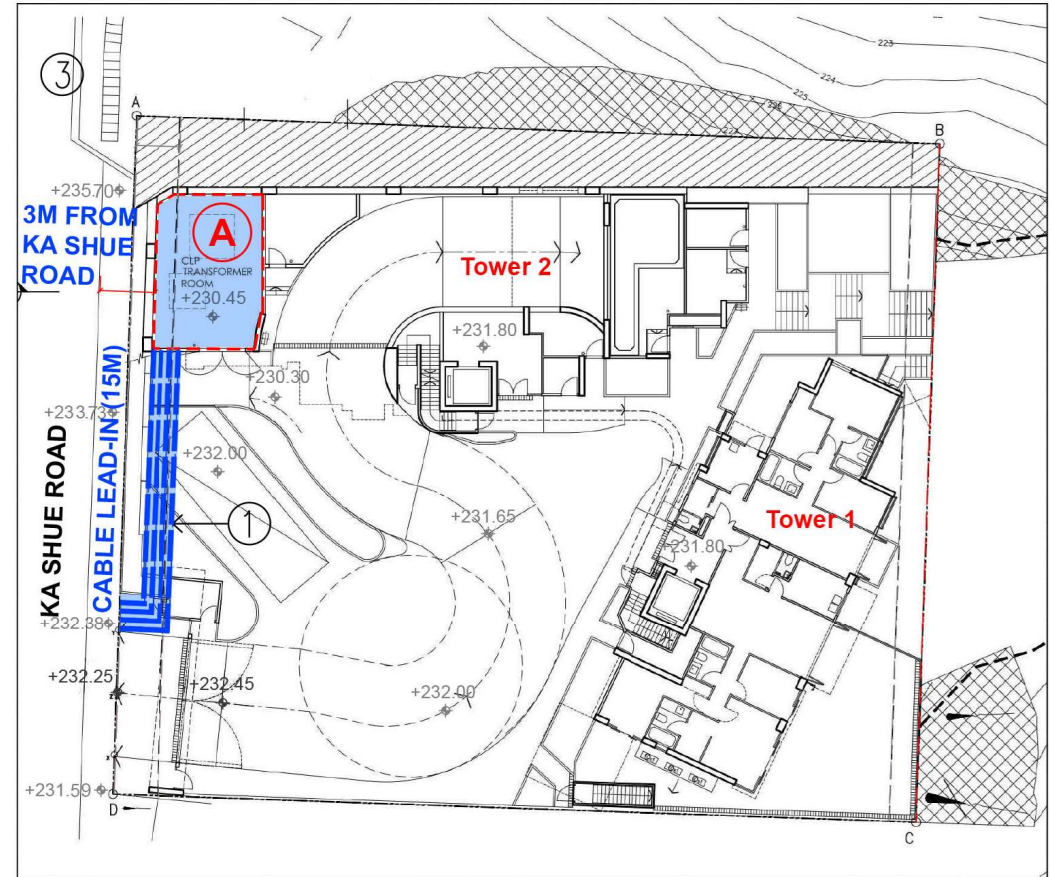
PAS (A/SK-TLS/56)



**CLP Prefers The Location Of A New Transformer Room Nearest Possible To Public Road ;
And Shortest Possible Length Of Cable Lead-in**

A.Cable Lead-in Is 29M Long And Away From Ka Shue Road , Not Preferred By CLP.

PRESENT SCHEME (A/SK-TLS/64)



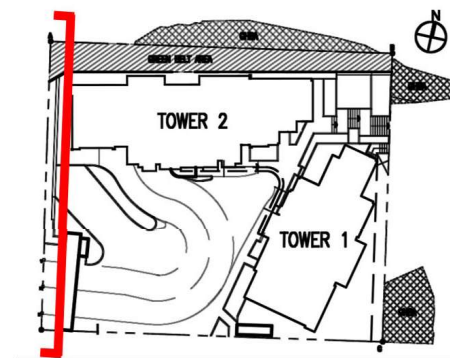
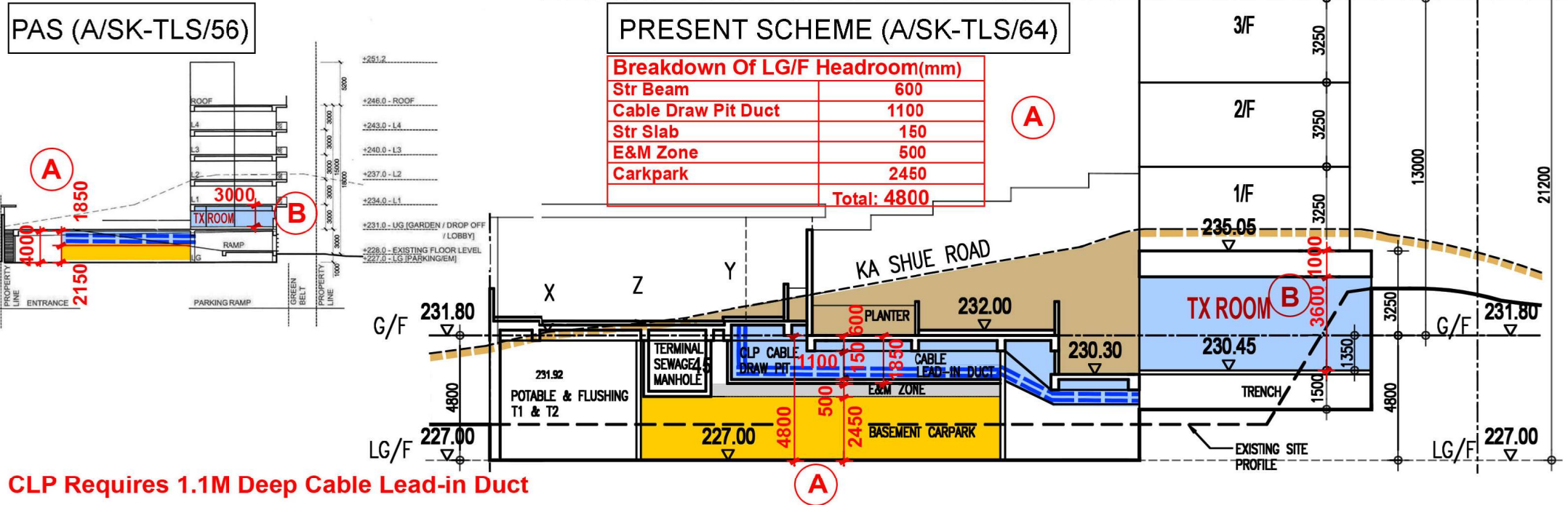
A.Cable Lead-in Is Only 15M Long And Only 3M Away From Ka Shue Road , Preferred By CLP.

TECHNICAL DIFFICULTIES

Figure F5

Solutions To Meeting CLP's Requirements:

1. The Relocation Of The Transformer Room
2. The Increased Height Of The LG/F
3. The Revised Levels Of The Transformer Room Ceiling Slab,
And The Raised Level Of 1/F Residential Flats.



REVISED S16 SUBMISSION - FULL HEIGHT SETBACK ALONG KA SHUE ROAD

Figure F6

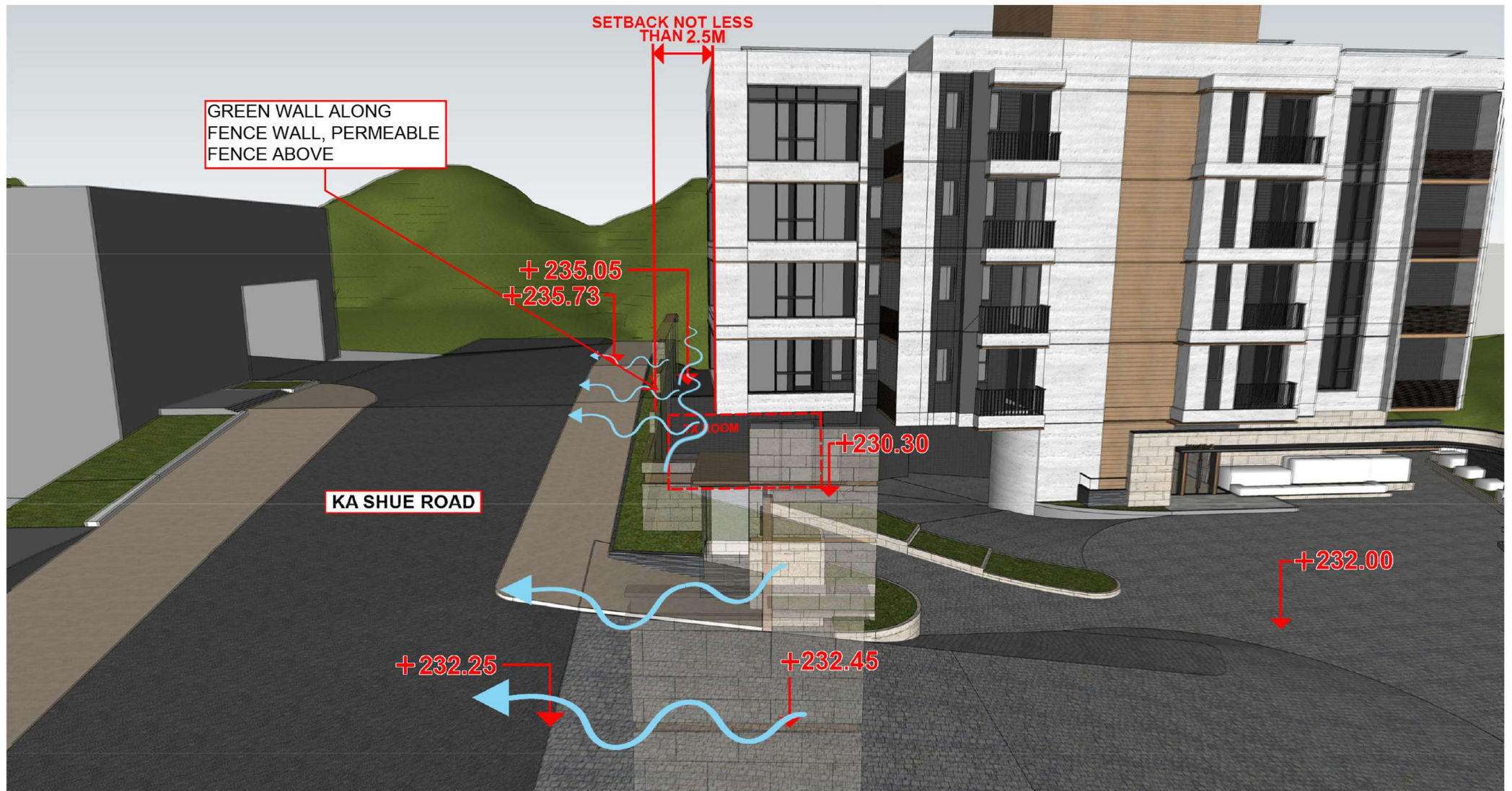


Figure F7

REVISED S16 SUBMISSION - FULL HEIGHT SETBACK ALONG KA SHUE ROAD

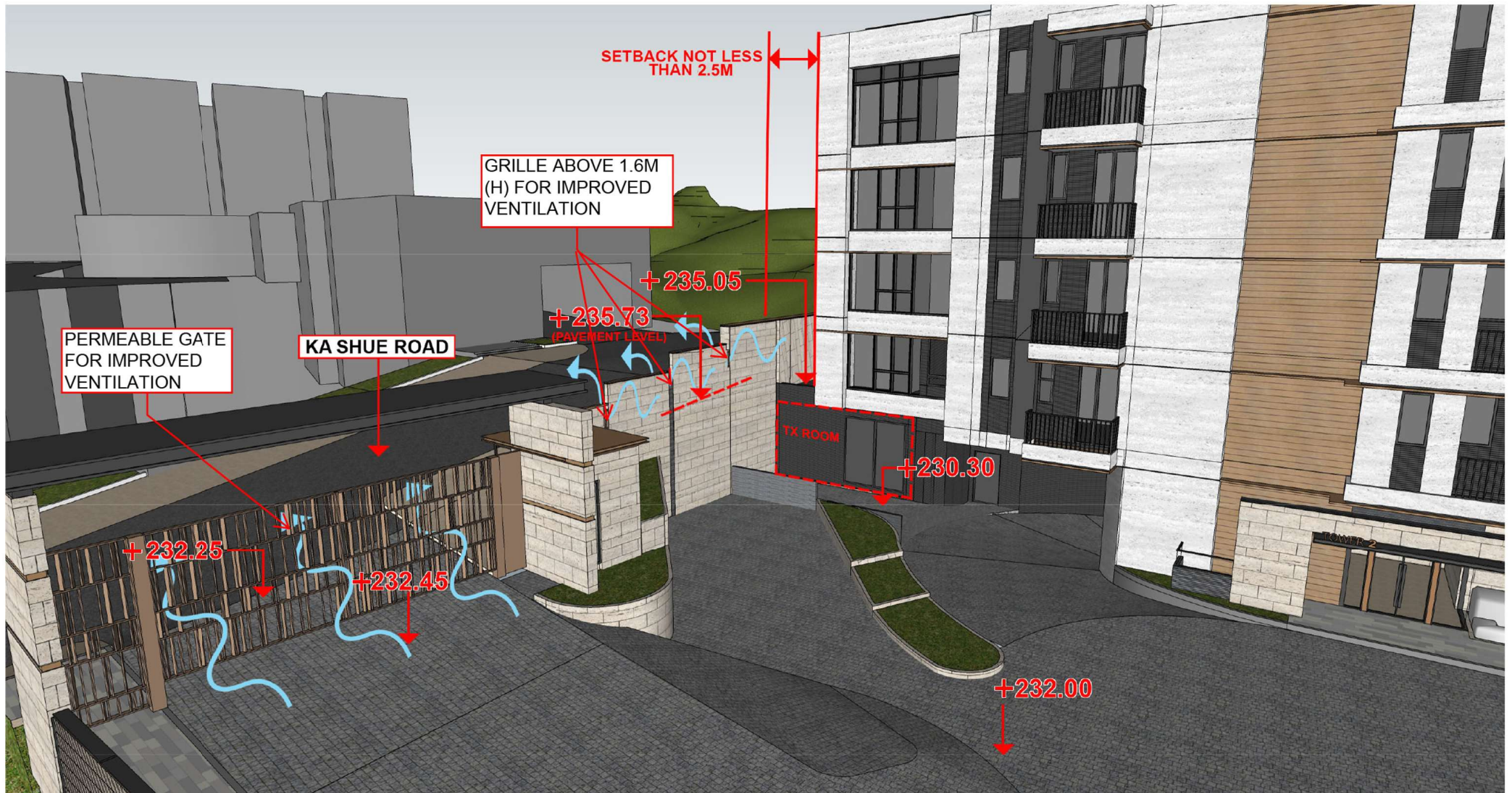


Figure F8

Artist
Impression of
the Building
Setback from
Ka Shue Road

Before



After

DESIGN MERITS

Proposed Relaxation Of Flats Floor Height Would Enhance Natural Cross Ventilation And Achieve Higher Grade Of Beamplus Sustainability

Figure F9

Credit Summary_NB v2.0E



	Section	Credit Requirement	Extent of Application	Credit Attainable	Credit Applicable	Credit Anticipated	Credit Possible
HWB 4	Enhanced Ventilation	(a) Fresh Air Provision 1.1 Fresh air provision in normally occupied spaces 1 credit for demonstrating that all normally occupied spaces in the building are provided with increased ventilation.	All buildings	1	Y	0	1
		1.2 Fresh air provision in not normally occupied spaces 1 credit for demonstrating that all not normally occupied spaces in the building are provided with adequate ventilation.		1	Y	0	0
		1.3 On-site measurements 1 ADDITIONAL BONUS credit for conducting on-site measurements to verify the ventilation performance for all normally occupied spaces.		1B	Y	0 B	0 B
		(b) Exhaust air 1 credit for the provision of an adequate ventilation system for spaces where significant indoor pollution sources are generated.		1	Y	1	0

HWB 11	Daylight	spaces and unoccupied spaces. 2 BONUS credits for demonstrating at least 55% of the total area of the studied normally occupied spaces achieves spatial Daylight Autonomy _{300/50%} (sDA _{300/50%}) and no more than 10% of the same area receives Annual Sunlight Exposure _{100,250} (ASE _{1000, 250}).	Residential, office and education buildings.	2B	Y	0 B	0 B
--------	----------	---	--	----	---	-----	-----

DWG: SKA-10

PAS	Present Scheme
UNCLASSIFIED	GOLD

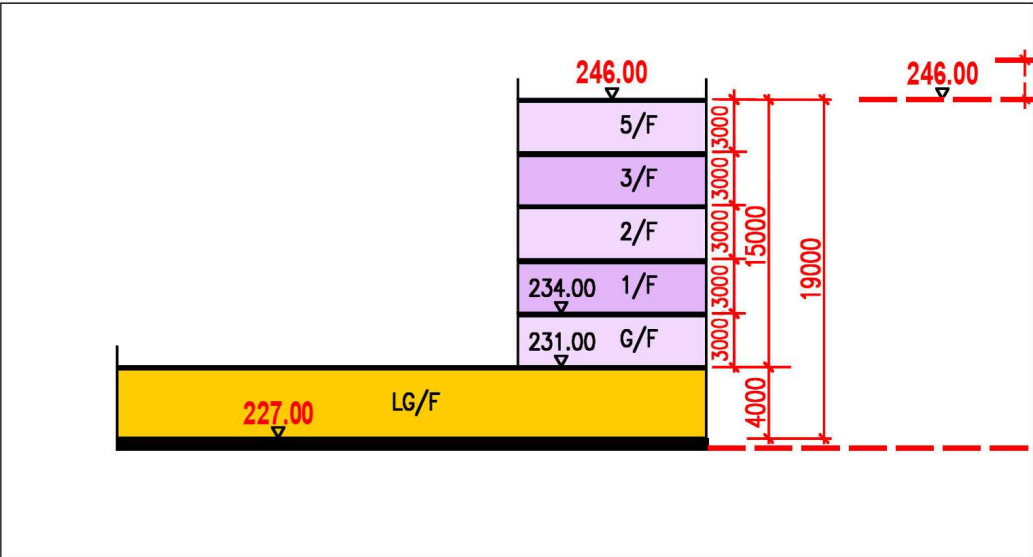
Comparsion Of Beam Plus

COMPARISION OF BUILDING HEIGHTS

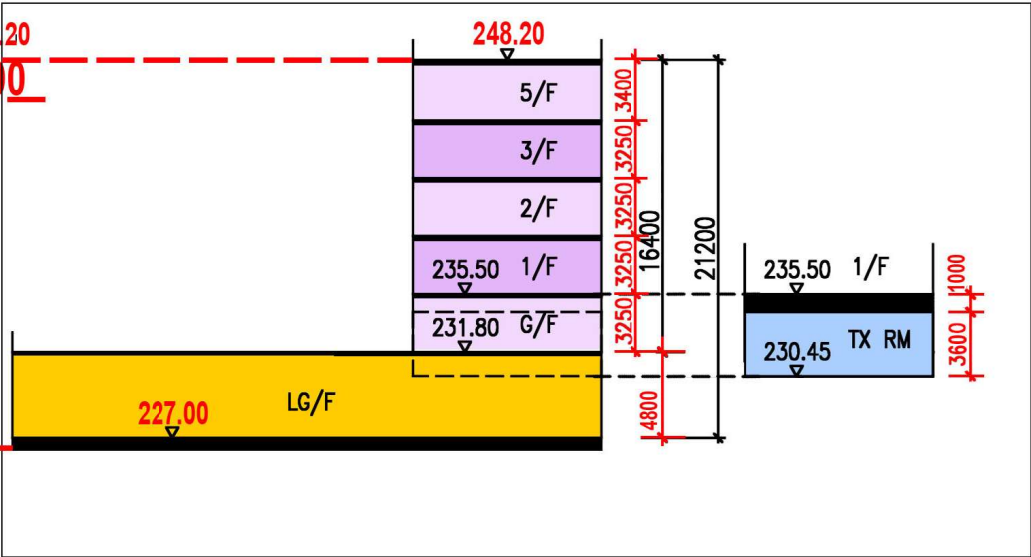
Due To Technical Difficulties 1 , 2 & 3 On Transformer Room ,
Together With Proposed Relaxation Of Heights ,
Current Submission Proposes Total Increase
Of 2.2M In Overall Building Height

Figure F10

PAS (A/SK-TLS/56)



PRESENT SCHEME (A/SK-TLS/64)



FLOOR-TO-FLOOR HEIGHT (M)			DIFFERENCE(M)
3.0	5/F	3.4	+ 0.4
3.0	3/F	3.2	+ 0.25
3.0	2/F	3.2	+ 0.25
3.0	1/F	3.2	+ 0.25
3.0	G/F	3.2	+ 0.25
4.0	LG/F	4.8	+ 0.8
TOTAL			+ 2.2

Total Increase
In Overall
Building Height
 $= 0.8 + (0.25 \times 4) + 0.4 = 2.2\text{M}$

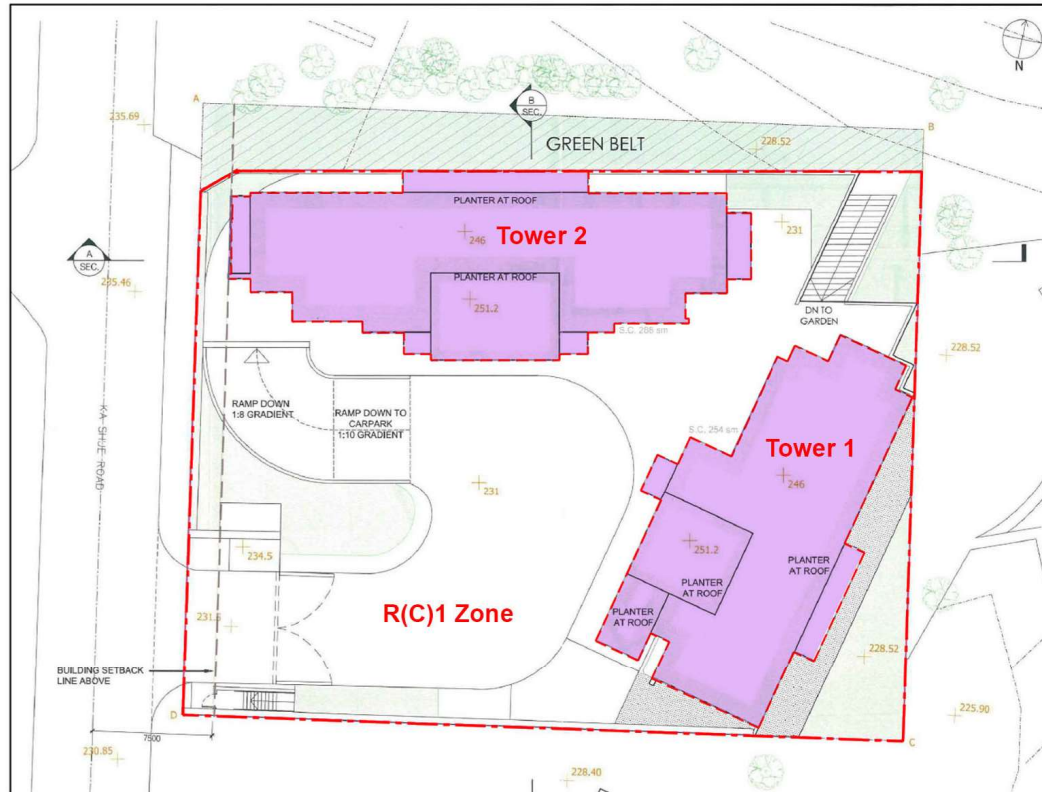
Comparision Of Building Heights

Slight Increase in Site Coverage to Provide Users' Friendly Covered Pedestrian Walkway Between Tower 1 And Tower 2

Slight Increase in Site Coverage to Provide Users' Friendly Covered Pedestrian Walkway Between Tower 1 And Tower 2

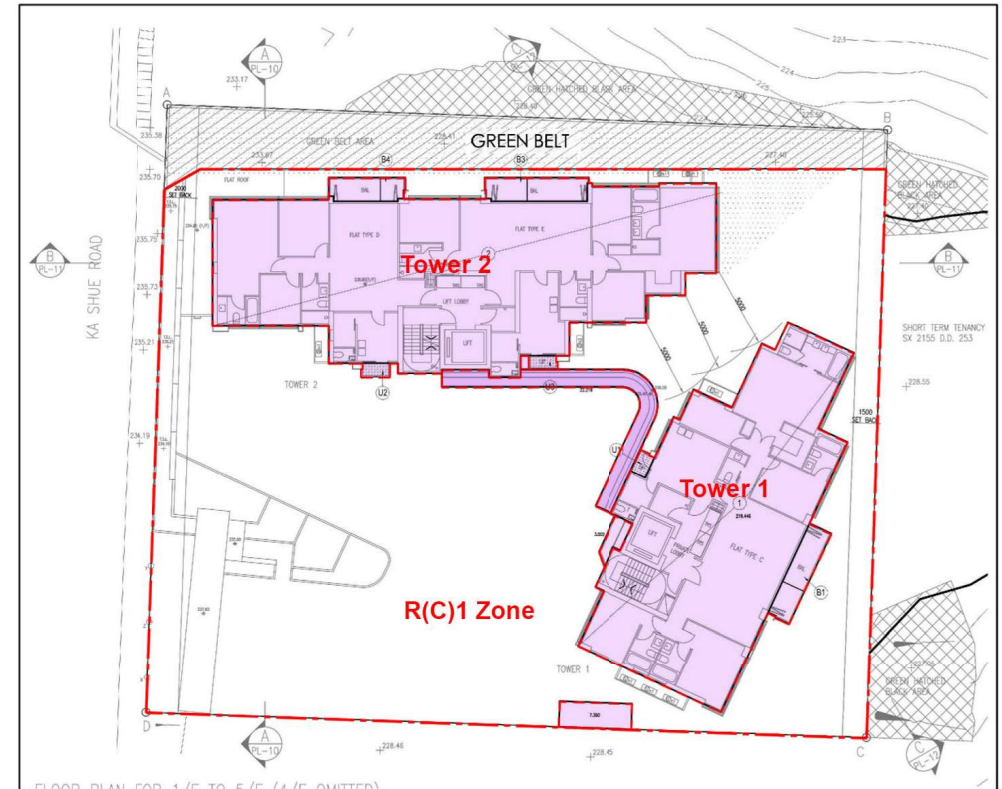
Figure F11

PAS (A/SK-TLS/56)



PAS	Present Scheme	Difference
33.911%	34.034%	+0.123%

PRESENT SCHEME (A/SK-TLS/64)



Proposed Slight Increase in Domestic Site Coverage By 0.123% To Provide Users' Friendly Pedestrian Connectivity with Cover Between Tower 1 And Tower 2, So As To Improve the On-Site Well-Being / Livelihood of The Development. (BEAM PLUS)