

A/H14/82

2020年 1月 1 08
 此文件在 收到。城市規劃委員會
 只會在收到所有必要的資料及文件後才正式確認收到
 申請的日期。

This document is received on 10 JAN 2020
 The Town Planning Board will formally acknowledge
 the date of receipt of the application only upon receipt
 of all the required information and documents.

Form No. S16-1
 表格第 S16-1 號

APPLICATION FOR PERMISSION UNDER SECTION 16 OF THE TOWN PLANNING ORDINANCE (CAP.131)

根據《城市規劃條例》(第131章)
 第16條遞交的許可申請

Applicable to proposals not involving or not only involving:
 適用於建議不涉及或不祇涉及:

- (i) Construction of "New Territories Exempted House(s)";
 興建「新界豁免管制屋宇」;
- (ii) Temporary use/development of land and/or building not exceeding 3 years in rural areas; and
 位於鄉郊地區土地上及/或建築物內進行為期不超過三年的臨時用途/發展;及
- (iii) Renewal of permission for temporary use or development in rural areas
 位於鄉郊地區的臨時用途或發展的許可續期

Applicant who would like to publish the notice of application in local newspapers to meet one of the Town Planning Board's requirements of taking reasonable steps to obtain consent of or give notification to the current land-owner, please refer to the following link regarding publishing the notice in the designated newspapers: https://www.info.gov.hk/tpb/en/plan_application/apply.html

申請人如欲在本地報章刊登申請通知,以採取城市規劃委員會就取得現行土地擁有人的同意或通知現行土地擁有人所指定的其中一項合理步驟,請瀏覽以下網址有關在指定的報章刊登通知:
https://www.info.gov.hk/tpb/tc/plan_application/apply.html

General Note and Annotation for the Form

填寫表格的一般指引及註解

* "Current land owner" means any person whose name is registered in the Land Registry as that of an owner of the land to which the application relates, as at 6 weeks before the application is made
 「現行土地擁有人」指在提出申請前六星期,其姓名或名稱已在土地註冊處註冊為該申請所關乎的土地的擁有人的人

* Please attach documentary proof 請夾附證明文件

^ Please insert number where appropriate 請在適當地方註明編號

Please fill "NA" for inapplicable item 請在不適用的項目填寫「不適用」

Please use separate sheets if the space provided is insufficient 如所提供的空間不足,請另頁說明

Please insert a 「✓」 at the appropriate box 請在適當的方格內上加上「✓」號

For Official Use Only 請勿填寫此欄	Application No. 申請編號	A/H14/82
	Date Received 收到日期	10 JAN 2020

- The completed form and supporting documents (if any) should be sent to the Secretary, Town Planning Board (the Board), 15/F, North Point Government Offices, 333 Java Road, North Point, Hong Kong.
申請人須把填妥的申請表格及其他支持申請的文件 (倘有), 送交香港北角渣華道 333 號北角政府合署 15 樓城市規劃委員會 (下稱「委員會」) 秘書收。
- Please read the "Guidance Notes" carefully before you fill in this form. The document can be downloaded from the Board's website at <http://www.info.gov.hk/tpb/>. It can also be obtained from the Secretariat of the Board at 15/F, North Point Government Offices, 333 Java Road, North Point, Hong Kong (Tel: 2231 4810 or 2231 4835), and the Planning Enquiry Counters of the Planning Department (Hotline: 2231 5000) (17/F, North Point Government Offices, 333 Java Road, North Point, Hong Kong and 14/F, Sha Tin Government Offices, 1 Sheung Wo Che Road, Sha Tin, New Territories).
請先細閱《申請須知》的資料單張, 然後填寫此表格。該份文件可從委員會的網頁下載 (網址: <http://www.info.gov.hk/tpb/>)。亦可向委員會秘書處 (香港北角渣華道 333 號北角政府合署 15 樓 - 電話: 2231 4810 或 2231 4835) 及規劃署的規劃資料查詢處 (熱線: 2231 5000) (香港北角渣華道 333 號北角政府合署 17 樓及新界沙田上禾輋路 1 號沙田政府合署 14 樓) 索取。
- This form can be downloaded from the Board's website, and obtained from the Secretariat of the Board and the Planning Enquiry Counters of the Planning Department. The form should be typed or completed in block letters. The processing of the application may be refused if the required information or the required copies are incomplete.
此表格可從委員會的網頁下載, 亦可向委員會秘書處及規劃署的規劃資料查詢處索取。申請人須以打印方式或以正楷填寫表格。如果申請人所提交的資料或文件副本不齊全, 委員會可拒絕處理有關申請。

1. Name of Applicant 申請人姓名/名稱	
☐ Mr. 先生 / ☐ Mrs. 夫人 / ☐ Miss 小姐 / ☐ Ms. 女士 ☒ Company 公司 / ☐ Organisation 機構	
General Conference Corporation of Seventh-Day Adventists	
2. Name of Authorised Agent (if applicable) 獲授權代理人姓名/名稱 (如適用)	
☐ Mr. 先生 / ☐ Mrs. 夫人 / ☐ Miss 小姐 / ☐ Ms. 女士 ☒ Company 公司 / ☐ Organisation 機構	
Knight Frank Petty Limited	
3. Application Site 申請地點	
(a) Full address / location / demarcation district and lot number (if applicable) 詳細地址/地點/丈量約份及地段號碼 (如適用)	No. 40 Stubbs Road, Happy Valley, Hong Kong
(b) Site area and/or gross floor area involved 涉及的地盤面積及/或總樓面面積	☒ Site area 地盤面積 7,933.8 sq.m 平方米 ☒ About 約 ☒ Gross floor area 總樓面面積 44,337.83 sq.m 平方米 ☒ About 約
(c) Area of Government land included (if any) 所包括的政府土地面積 (倘有)	Nil sq.m 平方米 ☐ About 約

(d) Name and number of the related statutory plan(s) 有關法定圖則的名稱及編號	The Peak Area Outline Zoning Plan No. S/H14/13
(e) Land use zone(s) involved 涉及的土地用途地帶	Government, Institution or Community
(f) Current use(s) 現時用途	Hospital (If there are any Government, institution or community facilities, please illustrate on plan and specify the use and gross floor area) (如有任何政府、機構或社區設施，請在圖則上顯示，並註明用途及總樓面面積)

4. "Current Land Owner" of Application Site 申請地點的「現行土地擁有人」

The applicant 申請人 -

- ☒ is the sole "current land owner"^{KK} (please proceed to Part 6 and attach documentary proof of ownership).
是唯一的「現行土地擁有人」^{KK} (請繼續填寫第 6 部分，並夾附業權證明文件)。
- ☐ is one of the "current land owners"^{KK} (please attach documentary proof of ownership).
是其中一名「現行土地擁有人」^{KK} (請夾附業權證明文件)。
- ☐ is not a "current land owner"^{KK}.
並不是「現行土地擁有人」^{KK}。
- ☐ The application site is entirely on Government land (please proceed to Part 6).
申請地點完全位於政府土地上 (請繼續填寫第 6 部分)。

5. Statement on Owner's Consent/Notification

就土地擁有人的同意/通知土地擁有人的陳述

- (a) According to the record(s) of the Land Registry as at (DD/MM/YYYY), this application involves a total of "current land owner(s)"[#].
根據土地註冊處截至 年 月 日的記錄，這宗申請共牽涉 名「現行土地擁有人」[#]。

(b) The applicant 申請人 -

- ☐ has obtained consent(s) of "current land owner(s)"[#].
已取得 名「現行土地擁有人」[#]的同意。

Details of consent of "current land owner(s)" [#] obtained 取得「現行土地擁有人」 [#] 同意的詳情		
No. of 'Current Land Owner(s)' 「現行土地擁有人」數目	Lot number/address of premises as shown in the record of the Land Registry where consent(s) has/have been obtained 根據土地註冊處記錄已獲得同意的地段號碼/處所地址	Date of consent obtained (DD/MM/YYYY) 取得同意的日期 (日/月/年)

(Please use separate sheets if the space of any box above is insufficient. 如上列任何方格的空間不足，請另頁說明)

- ☐ has notified "current land owner(s)"⁴
已通知 名「現行土地擁有人」⁴。

Details of the "current land owner(s)" ⁴ notified 已獲通知「現行土地擁有人」的詳細資料		
No. of 'Current Land Owner(s)' 「現行土地擁有人」數目	Lot number/address of premises as shown in the record of the Land Registry where notification(s) has/have been given 根據土地註冊處記錄已發出通知的地段號碼／處所地址	Date of notification given (DD/MM/YYYY) 通知日期(日/月/年)

(Please use separate sheets if the space of any box above is insufficient. 如上列任何方格的空間不足，請另頁說明)

- ☐ has taken reasonable steps to obtain consent of or give notification to owner(s):
已採取合理步驟以取得土地擁有人同意或向該人發給通知。詳情如下：

Reasonable Steps to Obtain Consent of Owner(s) 取得土地擁有人同意所採取的合理步驟

- ☐ sent request for consent to the "current land owner(s)" on (DD/MM/YYYY)⁴
於 (日/月/年)向每一名「現行土地擁有人」⁴郵遞要求同意書⁴

Reasonable Steps to Give Notification to Owner(s) 向土地擁有人發出通知所採取的合理步驟

- ☐ published notices in local newspapers on (DD/MM/YYYY)⁴
於 (日/月/年)在指定報章就申請刊登一次通知⁴
- ☐ posted notice in a prominent position on or near application site/premises on (DD/MM/YYYY)⁴
於 (日/月/年)在申請地點／申請處所或附近的顯明位置貼出關於該申請的通知⁴
- ☐ sent notice to relevant owners' corporation(s)/owners' committee(s)/mutual aid committee(s)/management office(s) or rural committee on (DD/MM/YYYY)⁴
於 (日/月/年)把通知寄往相關的業主立案法團／業主委員會／互助委員會或管理處，或有關的鄉事委員會⁴

Others 其他

- ☐ others (please specify)
其他（請指明）

Note: May insert more than one 「✓」.

Information should be provided on the basis of each and every lot (if applicable) and premises (if any) in respect of the application.

註：可在多於一個方格內加上「✓」號

申請人須就申請涉及的每一地段（倘適用）及處所（倘有）分別提供資料

6. Type(s) of Application 申請類別

- ☐ Type (i) Change of use within existing building or part thereof
第(i)類 更改現有建築物或其部分內的用途
- ☐ Type (ii) Diversion of stream / excavation of land / filling of land / filling of pond as required under Notes of Statutory Plan(s)
第(ii)類 根據法定圖則《註釋》內所要求的河道改道／挖土／填土／填塘工程
- ☐ Type (iii) Public utility installation / Utility installation for private project
第(iii)類 公用事業設施裝置／私人發展計劃的公用設施裝置
- ☒ Type (iv) Minor relaxation of stated development restriction(s) as provided under Notes of Statutory Plan(s)
第(iv)類 略為放寬於法定圖則《註釋》內列明的發展限制
- ☒ Type (v) Use / development other than (i) to (iii) above
第(v)類 上述的(i)至(iii)項以外的用途／發展

Note 1: May insert more than one 「✓」.

註 1: 可在多於一個方格內加上「✓」號

Note 2: For Development involving columbarium use, please complete the table in the Appendix.

註 2: 如發展涉及靈灰安置用途，請填妥於附件的表格。

(a) Total floor area involved 涉及的總樓面面積			
sq.m 平方米			
(b) Proposed use(s)/development 擬議用途/發展		(If there are any Government, institution or community facilities, please illustrate on plan and specify the use and gross floor area) (如有任何政府、機構或社區設施，請在圖則上顯示，並註明用途及總樓面面積)	
(c) Number of storeys involved 涉及層數		Number of units involved 涉及單位數目	
(d) Proposed floor area 擬議樓面面積	Domestic part 住用部分 sq.m 平方米 ☐ About 約		
	Non-domestic part 非住用部分 sq.m 平方米 ☐ About 約		
	Total 總計 sq.m 平方米 ☐ About 約		
(e) Proposed uses of different floors (if applicable) 不同樓層的擬議用途(如適用) (Please use separate sheets if the space provided is insufficient) (如所提供的空間不足，請另頁說明)	Floor(s) 樓層	Current use(s) 現時用途	Proposed use(s) 擬議用途

(ii) For Type (ii) application 供第(ii)類申請		
(a) Operation involved 涉及工程	☐ Diversion of stream 河道改道 ☐ Filling of pond 填塘 Area of filling 填塘面積 sq.m 平方米 ☐ About 約 Depth of filling 填塘深度 m 米 ☐ About 約 ☐ Filling of land 填土 Area of filling 填土面積 sq.m 平方米 ☐ About 約 Depth of filling 填土厚度 m 米 ☐ About 約 ☐ Excavation of land 挖土 Area of excavation 挖土面積 sq.m 平方米 ☐ About 約 Depth of excavation 挖土深度 m 米 ☐ About 約 (Please indicate on site plan the boundary of concerned land/pond(s), and particulars of stream diversion, the extent of filling of land/pond(s) and/or excavation of land) (請用圖則顯示有關土地/池塘界線, 以及河道改道、填塘、填土及/或挖土的細節及/或範圍)	
	(b) Intended use/development 有意進行的用途/發展	

(iii) For type (iii) application 供第(iii)類申請													
(a) Nature and scale 性質及規模	☐ Public utility installation 公用事業設施裝置 ☐ Utility installation for private project 私人發展計劃的公用設施裝置 Please specify the type and number of utility to be provided as well as the dimensions of each building/structure, where appropriate 請註明有關裝置的性質及數量, 包括每座建築物/構築物(倘有)的長度、高度和闊度												
	<table border="1"> <thead> <tr> <th>Name/type of installation 裝置名稱/種類</th> <th>Number of provision 數量</th> <th>Dimension of each installation/ building/structure (m) (LxWxH) 每個裝置/建築物/構築物的尺寸 (米)(長x闊x高)</th> </tr> </thead> <tbody> <tr> <td> </td> <td> </td> <td> </td> </tr> <tr> <td> </td> <td> </td> <td> </td> </tr> <tr> <td> </td> <td> </td> <td> </td> </tr> </tbody> </table> (Please illustrate on plan the layout of the installation 請用圖則顯示裝置的布局)		Name/type of installation 裝置名稱/種類	Number of provision 數量	Dimension of each installation/ building/structure (m) (LxWxH) 每個裝置/建築物/構築物的尺寸 (米)(長x闊x高)								
Name/type of installation 裝置名稱/種類	Number of provision 數量	Dimension of each installation/ building/structure (m) (LxWxH) 每個裝置/建築物/構築物的尺寸 (米)(長x闊x高)											

(iv) For Type (iv) application 供第(iv)類申請

- (a) Please specify the proposed minor relaxation of stated development restriction(s) and also fill in the proposed use/development and development particulars in part (v) below –
請列明擬議略為放寬的發展限制並填妥於第(v)部分的擬議用途/發展及發展細節 –

- ☐ Plot ratio restriction 地積比率限制 From 由 to 至
- ☐ Gross floor area restriction 總樓面面積限制 From 由sq. m 平方米 to 至sq. m 平方米
- ☐ Site coverage restriction 上蓋面積限制 From 由% to 至
- ☒ Building height restriction 建築物高度限制
From 由m 米 to 至 m 米
From 由 172 and 190 mPD 米 (主水平基準上) to 至
173.568 and 208.168 mPD 米 (主水平基準上)
From 由 storeys 層 to 至 storeys 層
- ☐ Non-building area restriction 非建築用地限制 From 由m to 至 m
- ☐ Others (please specify) 其他 (請註明)

(v) For Type (v) application 供第(v)類申請

(a) Proposed use(s)/development
擬議用途/發展

Proposed Minor Relaxation of Building Height Restriction for
Permitted Hospital Redevelopment

(Please illustrate the details of the proposal on a layout plan 請用平面圖說明建議詳情)

(b) Development Schedule 發展細節表

Proposed gross floor area (GFA) 擬議總樓面面積	44,337.83	sq.m 平方米	☐ About 約
Proposed plot ratio 擬議地積比率	5.59		☐ About 約
Proposed site coverage 擬議上蓋面積	56.03	%	☐ About 約
Proposed no. of blocks 擬議座數	4		
Proposed no. of storeys of each block 每座建築物的擬議層數	16, 15 and 10	storeys 層	
	include 包括 1, 1 and 3	storeys of basements 層地庫	
	☐ exclude 不包括	storeys of basements 層地庫	
Proposed building height of each block 每座建築物的擬議高度	 mPD 米(主水平基準上)		☐ About 約
	 m 米		☐ About 約

☐ Domestic part 住用部分GFA 總樓面面積 sq. m 平方米 ☐ About 約

number of Units 單位數目

average unit size 單位平均面積 sq. m 平方米 ☐ About 約

estimated number of residents 估計住客數目

☒ Non-domestic part 非住用部分GFA 總樓面面積☐ eating place 食肆 sq. m 平方米 ☐ About 約☐ hotel 酒店 sq. m 平方米 ☐ About 約(please specify the number of rooms
請註明房間數目)☐ office 辦公室 sq. m 平方米 ☐ About 約☐ shop and services 商店及服務行業 sq. m 平方米 ☐ About 約☒ Government, institution or community facilities

政府、機構或社區設施

(please specify the use(s) and concerned land
area(s)/GFA(s) 請註明用途及有關的地面面積／總
樓面面積)Please refer to the Supplementary
Planning Statement☐ other(s) 其他(please specify the use(s) and concerned land
area(s)/GFA(s) 請註明用途及有關的地面面積／總
樓面面積)☐ Open space 休憩用地

(please specify land area(s) 請註明地面面積)

☐ private open space 私人休憩用地 sq. m 平方米 ☐ Not less than 不少於☐ public open space 公眾休憩用地 sq. m 平方米 ☐ Not less than 不少於

(c) Use(s) of different floors (if applicable) 各樓層的用途 (如適用)

[Block number] [座數]	[Floor(s)] [層數]	[Proposed use(s)] [擬議用途]
.....		Please refer to Supplementary Planning Statement
.....		
.....		
.....		
.....		

(d) Proposed use(s) of uncovered area (if any) 露天地方 (倘有) 的擬議用途

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7. Anticipated Completion Time of the Development Proposal 擬議發展計劃的預計完成時間

Anticipated completion time (in month and year) of the development proposal (by phase (if any)) (e.g. June 2023)
擬議發展計劃預期完成的年份及月份 (分期 (倘有)) (例: 2023 年 6 月)
(Separate anticipated completion times (in month and year) should be provided for the proposed public open space and Government, institution or community facilities (if any))
(申請人須就擬議的公眾休憩用地及政府、機構或社區設施 (倘有) 提供個別擬議完成的年份及月份)

2035

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8. Vehicular Access Arrangement of the Development Proposal 擬議發展計劃的行車通道安排

Any vehicular access to the site/subject building? 是否有車路通往地盤/有關建築物?	Yes 是 No 否	☒ There is an existing access. (please indicate the street name, where appropriate) 有一條現有車路。(請註明車路名稱(如適用)) Stubbs Road ☒ There is a proposed access. (please illustrate on plan and specify the width) 有一條擬議車路。(請在圖則顯示, 並註明車路的闊度)																		
Any provision of parking space for the proposed use(s)? 是否有為擬議用途提供停車位?	Yes 是 No 否	☒ (Please specify type(s) and number(s) and illustrate on plan) 請註明種類及數目並於圖則上顯示) <table border="0"> <tr> <td>Private Car Parking Spaces 私家車車位</td> <td>175</td> </tr> <tr> <td>Motorcycle Parking Spaces 電單車車位</td> <td></td> </tr> <tr> <td>Light Goods Vehicle Parking Spaces 輕型貨車泊車位</td> <td></td> </tr> <tr> <td>Medium Goods Vehicle Parking Spaces 中型貨車泊車位</td> <td></td> </tr> <tr> <td>Heavy Goods Vehicle Parking Spaces 重型貨車泊車位</td> <td></td> </tr> <tr> <td>Others (Please Specify) 其他 (請列明)</td> <td></td> </tr> <tr> <td>Disabled Visitors Parking Spaces</td> <td>6</td> </tr> <tr> <td>Ambulance Parking Spaces</td> <td>3</td> </tr> </table>	Private Car Parking Spaces 私家車車位	175	Motorcycle Parking Spaces 電單車車位		Light Goods Vehicle Parking Spaces 輕型貨車泊車位		Medium Goods Vehicle Parking Spaces 中型貨車泊車位		Heavy Goods Vehicle Parking Spaces 重型貨車泊車位		Others (Please Specify) 其他 (請列明)		Disabled Visitors Parking Spaces	6	Ambulance Parking Spaces	3		
Private Car Parking Spaces 私家車車位	175																			
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Others (Please Specify) 其他 (請列明)																				
Disabled Visitors Parking Spaces	6																			
Ambulance Parking Spaces	3																			
Any provision of loading/unloading space for the proposed use(s)? 是否有為擬議用途提供上落客貨車位?	Yes 是 No 否	☒ (Please specify type(s) and number(s) and illustrate on plan) 請註明種類及數目並於圖則上顯示) <table border="0"> <tr> <td>Taxi Spaces 的士車位</td> <td>3</td> </tr> <tr> <td>Coach Spaces 旅遊巴車位</td> <td></td> </tr> <tr> <td>Light Goods Vehicle Spaces 輕型貨車車位</td> <td></td> </tr> <tr> <td>Medium Goods Vehicle Spaces 中型貨車車位</td> <td></td> </tr> <tr> <td>Heavy Goods Vehicle Spaces 重型貨車車位</td> <td></td> </tr> <tr> <td>Others (Please Specify) 其他 (請列明)</td> <td></td> </tr> <tr> <td>Heavy / Medium Goods Vehicle Spaces</td> <td>2</td> </tr> <tr> <td>Ambulance</td> <td>1</td> </tr> <tr> <td>Public light buses / Maxicabs</td> <td>1</td> </tr> </table>	Taxi Spaces 的士車位	3	Coach Spaces 旅遊巴車位		Light Goods Vehicle Spaces 輕型貨車車位		Medium Goods Vehicle Spaces 中型貨車車位		Heavy Goods Vehicle Spaces 重型貨車車位		Others (Please Specify) 其他 (請列明)		Heavy / Medium Goods Vehicle Spaces	2	Ambulance	1	Public light buses / Maxicabs	1
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Others (Please Specify) 其他 (請列明)																				
Heavy / Medium Goods Vehicle Spaces	2																			
Ambulance	1																			
Public light buses / Maxicabs	1																			

9. Impacts of Development Proposal 擬議發展計劃的影響

If necessary, please use separate sheets to indicate the proposed measures to minimise possible adverse impacts or give justifications/reasons for not providing such measures.

如需要的話，請另頁表示可盡量減少可能出現不良影響的措施，否則請提供理據/理由。

Does the development proposal involve alteration of existing building? 擬議發展計劃是否包括現有建築物的改動?	Yes 是 No 否	☐ Please provide details 請提供詳情																													
Does the development proposal involve the operation on the right? 擬議發展是否涉及右列的工程? (Note: where Type (ii) application is the subject of application, please skip this section. 註：如申請涉及第(ii)類申請，請跳至下一條問題。)	Yes 是 No 否	☒ (Please indicate on site plan the boundary of concerned land/pond(s), and particulars of stream diversion, the extent of filling of land/pond(s) and/or excavation of land) (請用地盤平面圖顯示有關土地/池塘界線，以及河道改道、填塘、填土及/或挖土的細節及/或範圍) ☐ Diversion of stream 河道改道 ☐ Filling of pond 填塘 Area of filling 填塘面積 sq.m 平方米 ☐ About 約 Depth of filling 填塘深度 m 米 ☐ About 約 ☐ Filling of land 填土 Area of filling 填土面積 sq.m 平方米 ☐ About 約 Depth of filling 填土厚度 m 米 ☐ About 約 ☒ Excavation of land 挖土 Area of excavation 挖土面積...4.929... sq.m 平方米 ☒ About 約 Depth of excavation 挖土深度7.20.....m 米 ☒ About 約 ☐																													
Would the development proposal cause any adverse impacts? 擬議發展計劃會否造成不良影響?	<table border="0"> <tr> <td>On environment 對環境</td> <td>Yes 會 ☐</td> <td>No 不會 ☒</td> </tr> <tr> <td>On traffic 對交通</td> <td>Yes 會 ☐</td> <td>No 不會 ☒</td> </tr> <tr> <td>On water supply 對供水</td> <td>Yes 會 ☐</td> <td>No 不會 ☒</td> </tr> <tr> <td>On drainage 對排水</td> <td>Yes 會 ☐</td> <td>No 不會 ☒</td> </tr> <tr> <td>On slopes 對斜坡</td> <td>Yes 會 ☐</td> <td>No 不會 ☒</td> </tr> <tr> <td>Affected by slopes 受斜坡影響</td> <td>Yes 會 ☐</td> <td>No 不會 ☒</td> </tr> <tr> <td>Landscape Impact 構成景觀影響</td> <td>Yes 會 ☐</td> <td>No 不會 ☒</td> </tr> <tr> <td>Tree Felling 砍伐樹木</td> <td>Yes 會 ☐</td> <td>No 不會 ☒</td> </tr> <tr> <td>Visual Impact 構成視覺影響</td> <td>Yes 會 ☐</td> <td>No 不會 ☒</td> </tr> <tr> <td>Others (Please Specify) 其他 (請列明)</td> <td>Yes 會 ☐</td> <td>No 不會 ☒</td> </tr> </table> Please state measure(s) to minimise the impact(s). For tree felling, please state the number, diameter at breast height and species of the affected trees (if possible) 請註明盡量減少影響的措施。如涉及砍伐樹木，請說明受影響樹木的數目、及胸高度的樹幹直徑及品種(倘可) Please refer to the Landscape Proposal and Tree Survey Report, Visual Impact Assessment, Traffic Impact Assessment, Environmental Assessment and Geotechnical Planning Review Report	On environment 對環境	Yes 會 ☐	No 不會 ☒	On traffic 對交通	Yes 會 ☐	No 不會 ☒	On water supply 對供水	Yes 會 ☐	No 不會 ☒	On drainage 對排水	Yes 會 ☐	No 不會 ☒	On slopes 對斜坡	Yes 會 ☐	No 不會 ☒	Affected by slopes 受斜坡影響	Yes 會 ☐	No 不會 ☒	Landscape Impact 構成景觀影響	Yes 會 ☐	No 不會 ☒	Tree Felling 砍伐樹木	Yes 會 ☐	No 不會 ☒	Visual Impact 構成視覺影響	Yes 會 ☐	No 不會 ☒	Others (Please Specify) 其他 (請列明)	Yes 會 ☐	No 不會 ☒
On environment 對環境	Yes 會 ☐	No 不會 ☒																													
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Others (Please Specify) 其他 (請列明)	Yes 會 ☐	No 不會 ☒																													

10. Justifications 理由

The applicant is invited to provide justifications in support of the application. Use separate sheets if necessary.
現請申請人提供申請理由及支持其申請的資料。如有需要，請另頁說明。

Please refer to the Supplementary Planning Statement

11. Declaration 聲明

I hereby declare that the particulars given in this application are correct and true to the best of my knowledge and belief.
本人謹此聲明，本人就這宗申請提交的資料，據本人所知及所信，均屬真實無誤。

I hereby grant a permission to the Board to copy all the materials submitted in an application to the Board and/or to upload such materials to the Board's website for browsing and downloading by the public free-of-charge at the Board's discretion.
本人現准許委員會酌情將本人就此申請所提交的所有資料複製及/或上載至委員會網站，供公眾免費瀏覽或下載。

Signature
簽署

☐ Applicant 申請人 / ☒ Authorised Agent 獲授權代理人

Calvin Kan

Manager, Planning and Development

Name in Block Letters

Position (if applicable)

姓名 (請以正楷填寫)

職位 (如適用)

Professional Qualification(s)
專業資格

- ☒ Member 會員 / ☐ Fellow of 資深會員
☒ HKIP 香港規劃師學會 / ☐ HKIA 香港建築師學會 /
☐ HKIS 香港測量師學會 / ☐ HKIE 香港工程師學會 /
☐ HKILA 香港園境師學會 / ☐ HKIUD 香港城市設計學會

Others 其他 RPP

on behalf of
代表

Knight Frank Petty Limited



☒ Company 公司 / ☐ Organisation Name and Chop (if applicable) 機構名稱及蓋章 (如適用)

Date 日期

07/01/2020

(DD/MM/YYYY 日/月/年)

Remark 備註

The materials submitted in an application to the Board and the Board's decision on the application would be disclosed to the public. Such materials would also be uploaded to the Board's website for browsing and free downloading by the public where the Board considers appropriate.

委員會會向公眾披露申請人所遞交的申請資料和委員會對申請所作的決定。在委員會認為合適的情況下，有關申請資料亦會上載至委員會網頁供公眾免費瀏覽及下載。

Warning 警告

Any person who knowingly or wilfully makes any statement or furnish any information in connection with this application, which is false in any material particular, shall be liable to an offence under the Crimes Ordinance.
任何人在明知或故意的情況下，就這宗申請提出在任何要項上是虛假的陳述或資料，即屬違反《刑事罪行條例》。

Statement on Personal Data 個人資料的聲明

- The personal data submitted to the Board in this application will be used by the Secretary of the Board and Government departments for the following purposes:
委員會就這宗申請所收到的個人資料會交給委員會秘書及政府部門，以根據《城市規劃條例》及相關的城市規劃委員會規劃指引的規定作以下用途：
 - the processing of this application which includes making available the name of the applicant for public inspection when making available this application for public inspection; and
處理這宗申請，包括公布這宗申請供公眾查閱，同時公布申請人的姓名供公眾查閱；以及
 - facilitating communication between the applicant and the Secretary of the Board/Government departments.
方便申請人與委員會秘書及政府部門之間進行聯絡。
- The personal data provided by the applicant in this application may also be disclosed to other persons for the purposes mentioned in paragraph 1 above.
申請人就這宗申請提供的個人資料，或亦會向其他人士披露，以作上述第 1 段提及的用途。
- An applicant has a right of access and correction with respect to his/her personal data as provided under the Personal Data (Privacy) Ordinance (Cap. 486). Request for personal data access and correction should be addressed to the Secretary of the Board at 15/F, North Point Government Offices, 333 Java Road, North Point, Hong Kong.
根據《個人資料(私隱)條例》(第 486 章)的規定，申請人有權查閱及更正其個人資料。如欲查閱及更正個人資料，應向委員會秘書提出有關要求，其地址為香港北角渣華道 333 號北角政府合署 15 樓。

Your Ref: TPB/A/H14/82

Our Ref: LAS/AC/CK/TT/18-19139 (Task 2)

The Secretary
Town Planning Board
15/F North Point Government Offices
333 Java Road, North Point
Hong Kong

12 March 2021

By Hand and Email

Dear Sirs

**APPLICATION FOR PERMISSION
UNDER SECTION 16 OF THE TOWN PLANNING ORDINANCE (CAP. 131)
PROPOSED MINOR RELAXATION OF BUILDING HEIGHT RESTRICTION
FOR PERMITTED HOSPITAL REDEVELOPMENT
AT 40 STUBBS ROAD, HAPPY VALLEY
(SECTION 16 PLANNING APPLICATION No. A/H14/82)**

We refer to the captioned application (TPB/A/H14/82).

Further to our original submission made to the Town Planning Board ("TPB") via letter dated 18 December 2019 and further submission made on 5 May 2020, 10 June 2020, 14 July 2020, 30 October 2020, 23 November 2020, 18 December 2020 and 27 January 2021, we enclose a set of further information comprising the following:

- Attachment I** A copy of Responses-to-Comments table addressing comments from the Planning Department, Lands Department, Highways Department and Transport Department
- Attachment II** A copy of Responses-to-Comments table addressing comments from the Public on the Further Information submitted on 18 December 2020 and 27 January 2021
- Attachment III** 35 hardcopies and 35 softcopies of the consolidated Supporting Planning Statement ("SPS") superseding the previous SPS, schematic architectural drawings, Landscape Proposal Tree Survey Report, Visual Impact Assessment, Revised Traffic Impact Assessment, Environmental Assessment, Geotechnical Planning Review Report and Sewerage Impact Assessment

Except the revised Traffic Impact Assessment which contains supplementary information, other assessments under **Attachment III** have been previously submitted, published and circulated to concerned Government
4/F Shui On Centre, 6-8 Harbour Road, Wanchai, Hong Kong 香港灣仔港灣道6-8號瑞安中心4字樓 knightfrank.com.hk
T 電話 +852 2840 1177 F 傳真 +852 2840 0600

12 March 2021
Town Planning Board
Attention: Secretary, Town Planning Board



Except the revised Traffic Impact Assessment which contains supplementary information, other assessments under **Attachment III** have been previously submitted, published and circulated to concerned Government departments via TPB. We would like to stress that the incorporation of these submitted assessments in **Attachment III** aims to provide an organized and thorough application background and details for easier understanding only.

The above information is submitted to address departmental and public comments received and constitutes no material change to the application. Should there be any queries, please feel free to contact the undersigned or our Ms Tammy Tam at 2846 7483.

Yours faithfully

For and on behalf of
Knight Frank Petty Limited

A handwritten signature in black ink, appearing to be "PP" followed by a stylized flourish.

Calvin Kan MHKIP RPP
Senior Manager, Planning & Development
Land Advisory Services
calvin.kan@hk.knightfrank.com
D +852 2846 7429

Encs

cc Client
Hong Kong Planning District Office
(Attn: Ms Nicole Lee)

(By email only)
(By email only)



Your Ref: TPB/AH14/82

Our Ref: LAS/AC/CK/TT/18-19139 (Task 2)

The Secretary
Town Planning Board
15/F North Point Government Offices
333 Java Road, North Point
Hong Kong

15 March 2021

By Hand and Email

Dear Sirs

**APPLICATION FOR PERMISSION
UNDER SECTION 16 OF THE TOWN PLANNING ORDINANCE (CAP. 131)
PROPOSED MINOR RELAXATION OF BUILDING HEIGHT RESTRICTION
FOR PERMITTED HOSPITAL REDEVELOPMENT
AT 40 STUBBS ROAD, HAPPY VALLEY
(SECTION 16 PLANNING APPLICATION No. A/H14/82)**

We refer to the further information submitted on 12 March 2021.

We hereby enclose 70 hardcopies of the Schematic Section A-A Plan to replace P.66 (Schematic Phasing Plan) of the Consolidated Supporting Planning Statement. The actual Schematic Phasing Plan can be found at P.69 of the aforementioned statement.

The above information only involves a replacement page and constitutes no material change to the application. Should there be any queries, please feel free to contact the undersigned or our Ms Tammy Tam at 2846 7483.

Yours faithfully

For and on behalf of
Knight Frank Petty Limited

Calvin Kan MHKIP RPP
Senior Manager, Planning & Development
Land Advisory Services
calvin.kan@hk.knightfrank.com
D +852 2846 7429



4/F Shui On Centre, 6-8 Harbour Road, Wanchai, Hong Kong 香港灣仔港灣道6-8號瑞安中心4字樓
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Knight Frank Petty Limited EAA Lic No C-010431
Knight Frank Hong Kong Limited EAA Lic No C-013197
Knight Frank (Services) Limited EAA Lic No C-012648

CP Property Management Limited
Knight Frank Asset Appraisal Limited
Knight Frank Project Design & Delivery Limited

knightfrank.com.hk



15 March 2021
Town Planning Board
Attention: Secretary, Town Planning Board



Encls

cc Client
Hong Kong Planning District Office
(Attn: Ms Nicole Lee)

(By email only)

(By email only)

Your Ref: TPB/A/H14/82

Our Ref: LAS/AC/CK/TT/18-19139 (Task 2)

The Secretary
Town Planning Board
15/F North Point Government Offices
333 Java Road, North Point
Hong Kong

7 May 2021

By Hand and Email

Dear Sirs

**APPLICATION FOR PERMISSION
UNDER SECTION 16 OF THE TOWN PLANNING ORDINANCE (CAP. 131)
PROPOSED MINOR RELAXATION OF BUILDING HEIGHT RESTRICTION
FOR PERMITTED HOSPITAL REDEVELOPMENT
AT 40 STUBBS ROAD, HAPPY VALLEY
(SECTION 16 PLANNING APPLICATION No. A/H14/82)**

RECEIVED
2021 MAY -7 P 12:01
TOWN PLANNING BOARD

We refer to the captioned application (TPB/A/H14/82).

Further to our original submission made to the Town Planning Board ("TPB") via letter dated 18 December 2019 and further submission made on 5 May 2020, 10 June 2020, 14 July 2020, 30 October 2020, 23 November 2020, 18 December 2020, 27 January 2021 and 12 March 2021, we enclose a set of further information comprising the following:

Attachment I A copy of Responses-to-Comments table addressing comments from the Highways Department and Planning Department

Attachment II A copy of Responses-to-Comments table addressing comments from the Public on the Further Information submitted on 12 March 2021

The above information is submitted to address departmental and public comments received and constitutes no material change to the application. We sincerely request to exempt the application from publication and recounting requirements.

7 May 2021
Town Planning Board
Attention: Secretary, Town Planning Board



Should there be any queries, please feel free to contact the undersigned or our Ms Tammy Tam at 2846 7483.

Yours faithfully

For and on behalf of
Knight Frank Petty Limited

A handwritten signature in black ink, appearing to be "CK" or similar, written over a faint circular stamp.

Calvin Kan MHKIP RPP
Senior Manager, Planning & Development
Land Advisory Services
calvin.kan@hk.knightfrank.com
D +852 2846 7429
Encs

cc Client
Hong Kong Planning District Office
(Attn: Ms Nicole Lee)

(By email only)
(By email only)

Attachment I

Responses-to-Comments table addressing comments from Government Departments

**APPLICATION FOR PERMISSION
UNDER SECTION 16 OF THE TOWN PLANNING ORDINANCE (CAP. 131)
FOR PROPOSED MINOR RELAXATION OF BUILDING HEIGHT RESTRICTION
FOR PERMITTED HOSPITAL REDEVELOPMENT
AT 40 STUBBS ROAD, HAPPY VALLEY
(SECTION 16 PLANNING APPLICATION NO. A/H14/82)**

Departmental Comments	Responses from Applicant
District Engineer, District and Maintenance Section (Hong Kong Office, Highways Department) received on 9 March 2021 (Contact: Mr Alfred Lee Tel No: 2231 5618)	
1. According to the photo of Annex 1, modification of the existing feature no. 11SW-D/R141(1) is proposed. The following is suggested to be included during the implementation of the modification works: (a) Before implementation of the slope modification works. The project proponent should prove the magnitude of vibration and ground movement, the change of ground water level, and/or other activities so induced by his works will not affect the structural/geotechnical integrity of this HyD feature at time of construction works in progress and/or in the long run. It is also required to establish an approved warning system to stop the construction works if the abovementioned movements exceed permissible limits or activities are considered causing damage of the retaining wall. It is also required to establish and implement a monitoring system, given prior acceptance of the proposal by GEO, which include the installation of monitoring stations on the retaining wall(s) and subsequent base line survey. (b) During the implementation of the modification works. Conduct regular, or if so required, monitoring survey during the process of construction works, and with assessment report afterwards. The construction activities should be suspended if the monitoring results are found exceeding the permissible limits. Prompt investigation should be carried out to find out the reasons of the case and to modify the method of construction to prevent possible damage to these slopes/retaining walls.	Noted. The applicant will submit relevant proposal in detailed design stage and obtain government approval before commencement of construction.

SECTION 16 PLANNING APPLICATION NO. A/H14/82

Departmental Comments		Responses from Applicant									
(c) Remedial proposals for damaged slopes / retaining walls If the structural/geotechnical integrity of the HyD feature is affected, the project proponent should carry out remedial works at his own cost and with the rectification proposal approved by GEO.											
2. Typo in feature no. The HyD feature affected should be feature no. 11SW-D/R141(1).		Noted.									
District Planning Officer, Hong Kong Planning District Office, Planning Department received on 28 April and 5 May 2021 (Contact: Ms Nicole Lee Tel No: 2231 4913)											
1. The absolute building heights of proposed redevelopment and existing buildings at the hospital		The absolute building heights of the proposed Block 1 and La Rue Building are tabulated below: <table><tr><td></td><td>La Rue Building (Existing)</td><td>Block 1 (Proposed)</td><td>Changes</td></tr><tr><td>Absolute Building Height</td><td>Approx. 43.33m</td><td>64.15m</td><td>+48.05%</td></tr></table>			La Rue Building (Existing)	Block 1 (Proposed)	Changes	Absolute Building Height	Approx. 43.33m	64.15m	+48.05%
	La Rue Building (Existing)	Block 1 (Proposed)	Changes								
Absolute Building Height	Approx. 43.33m	64.15m	+48.05%								
2. Any low cost beds available in existing hospital and its number if available		'Low cost beds' are not provided in existing hospital.									
3. The breakdown of car parking spaces of existing hospital		The breakdown of car parking space of existing hospital is as follows: <table><tr><td></td><td>Existing</td></tr><tr><td>No. of Car parking</td><td>82 (private cars only)</td></tr><tr><td>No. of Taxi layby</td><td>0</td></tr></table>			Existing	No. of Car parking	82 (private cars only)	No. of Taxi layby	0		
	Existing										
No. of Car parking	82 (private cars only)										
No. of Taxi layby	0										
4. Provide further justification/explanation on the development programmed of the proposed redevelopment		Please see Annex A for the proposed programme.									

SECTION 16 PLANNING APPLICATION NO. A/H14/82

Departmental Comments	Responses from Applicant
5. Any area/floor spaces that are not included in the GFA calculation.	The total GFA of proposed redevelopment is 44,337.83sqm, excluding areas that would be exempted from GFA calculations under the Building Ordinance.
6. Please indicate the 13 trees that are proposed to be felled but outside the application site boundary	Please see Annex B of tree felling plan of which fell trees outside the application boundary are highlighted
7. Any special/additional measures to be adopted to minimise the potential nuisance/impacts to the surrounding developments during construction phase.	During the construction phase, the Applicant will comply with the regulations and adopt various mitigation measures specified in the Environmental Study. It is understood that there may be adverse impacts to the hospital operation and surrounding during the construction phase. Hence, a series of mitigation measures will be employed to minimize the air and noise impacts. For air quality, a vehicle wheel and body washing facility shall be installed at the site exit to remove any dusty materials from wheels before leaving the site; vehicles arriving / leaving the site loaded with dusty materials shall be covered entirely by clean impervious sheeting; all dusty activities and materials shall be sprayed with water to dampen dust; open temporary stockpiles will be avoided; and any stockpile of dusty materials shall be covered entirely by impervious sheeting, and / or placed in an area sheltered on the top and 4 sides. For noise impact, the Applicant will limit the noise emission at source, avoid parallel operation of noisy equipment, provide noise barriers, carefully schedule the noisy activities and use quieter machine with silencers or mufflers. With the said mitigation measures, the hospital and school operation as well as the livelihood of the nearby residents will not be undermined. For the construction works, in particular piling works, will be carefully planned and executed to avoid nuisance and disturbance to the adjacent school. The appointed Contractor will be required to liaise with the adjacent school in respect of the time schedules of school examinations/ tests for 'no noisy works day' and will make every endeavor to avoid proceeding noisy works during the school examination/test period.
8. For figure v4.1 of VIA, please provide the existing view.	Please refer to Annex C of the existing view.
9. Please advise whether the plant room on R/Fs are shown in the photomontages.	Yes.
10. Please advise the what type of hospital facilities to be located on the 5/F of Block 2.	The type of hospital facilities to be located on 5/F of Block 2 is yet to be determined in a later stage.

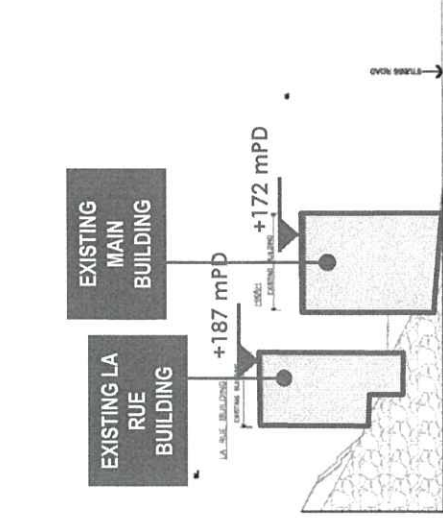
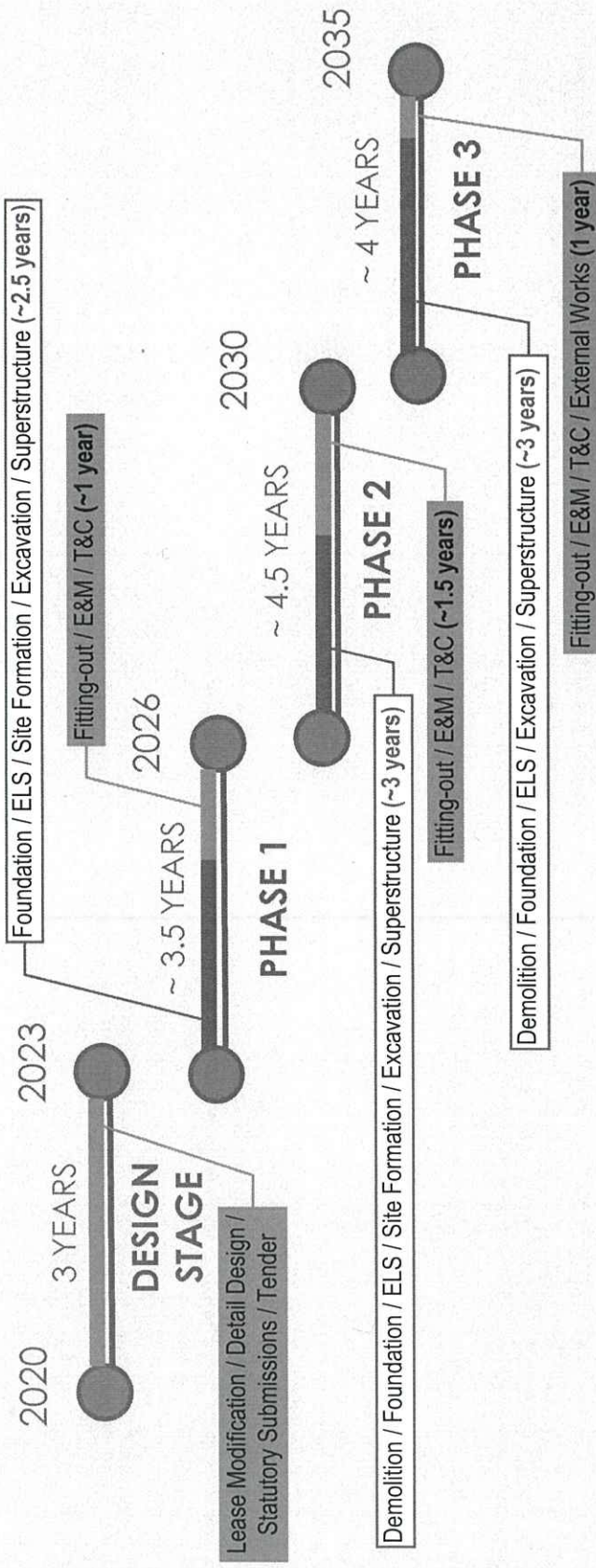
SECTION 16 PLANNING APPLICATION NO. A/H14/82

Departmental Comments	Responses from Applicant
11. According to your submission, the plant room at R/F of Blocks 1 and 2 did not count towards the proposed building height. Please advise if JPN 5 is complied with.	Yes, JPN 5 is complied with.
12. Please advise the implementation programme of the terrace garden and courtyard garden.	The terraced garden and courtyard garden facing Stubbs Road will be implemented in Phase 3.
13. Please indicate the pedestrian flow between the lift tower and proposed Block 1, as well as between terrace/ courtyard gardens to proposed Block 1.	There are three ways to access to the Proposed Block 1 from the lift tower abutting Stubbs Road. Those three routes are shown on Annex D .

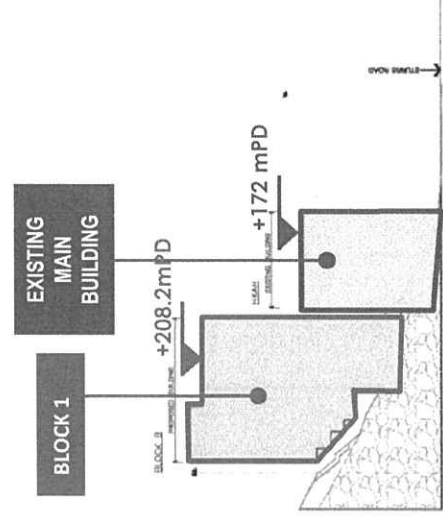
Annex A

Proposed Preliminary Programme

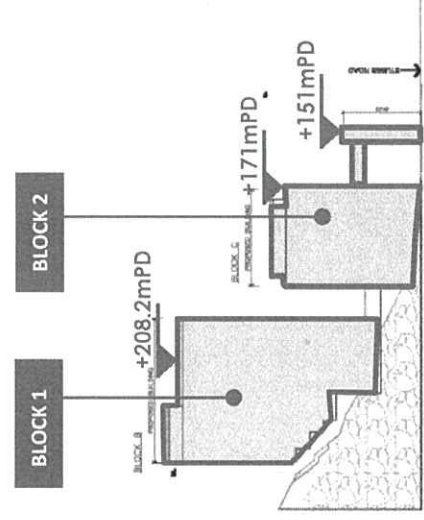
Proposed Preliminary Programme



Existing

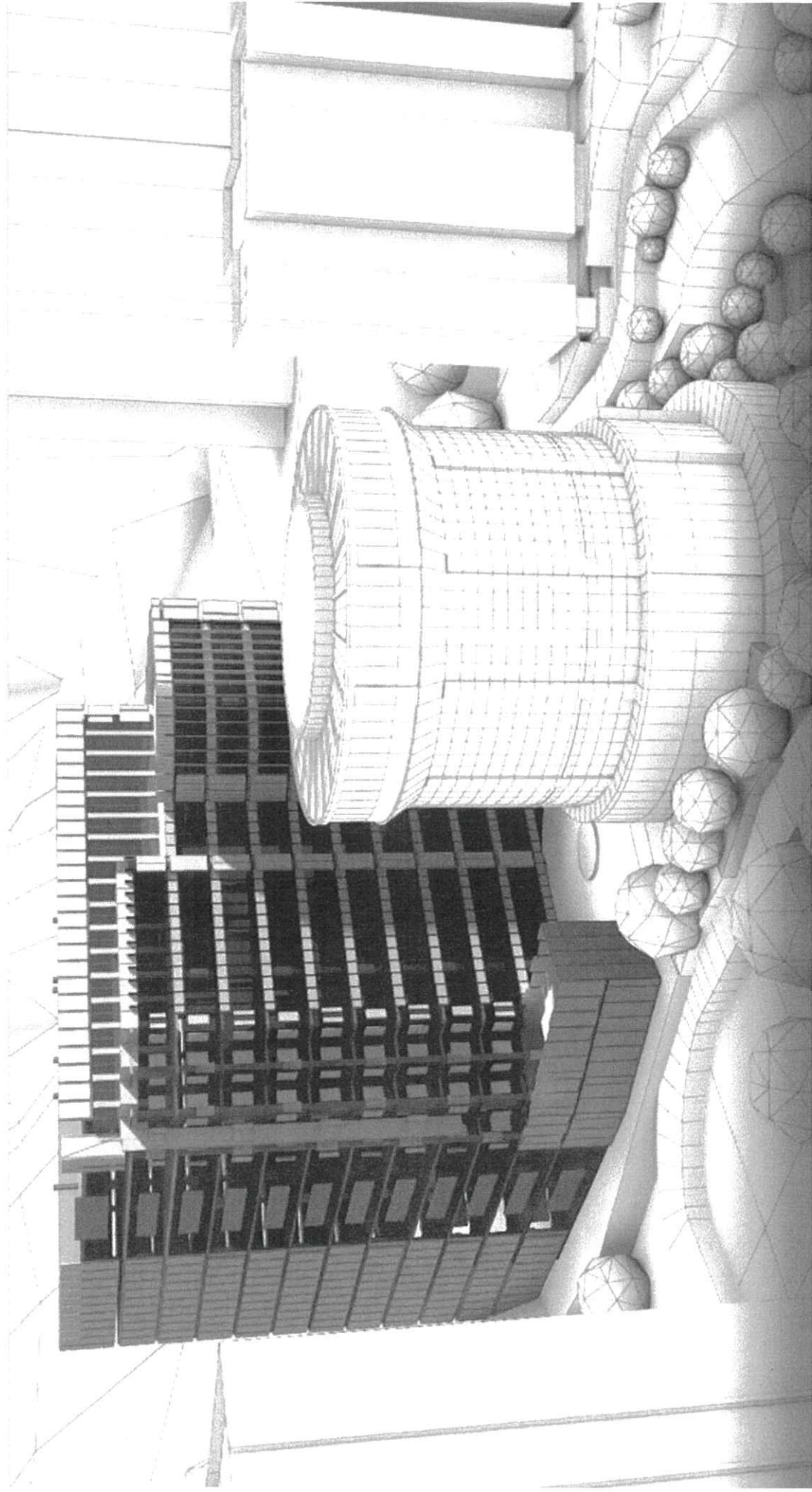


Phase 1 & 2

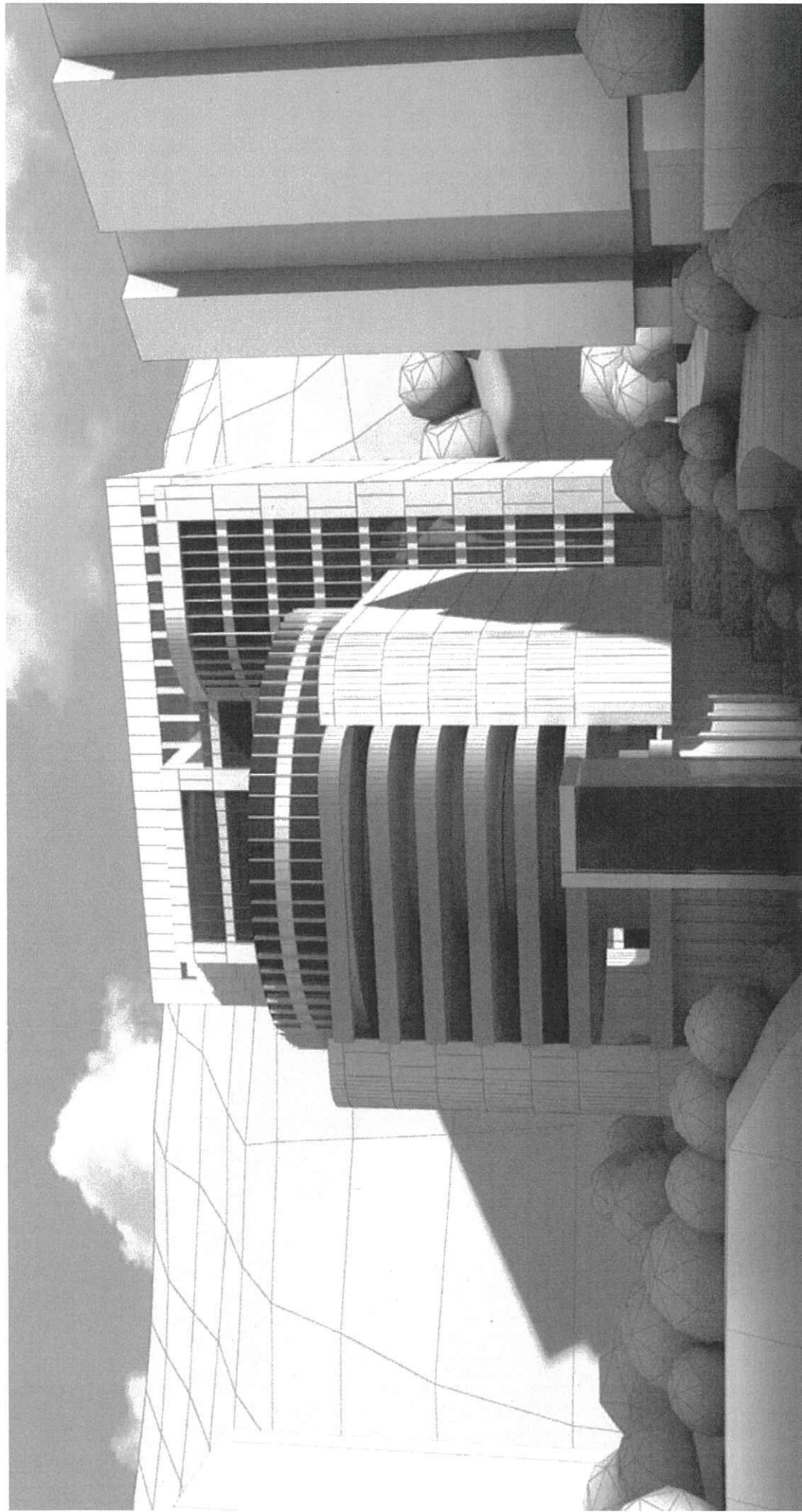


Phase 3

Phase I and Phase II



Phase III



Annex B

Proposed Tree Felling Plan

Annex C

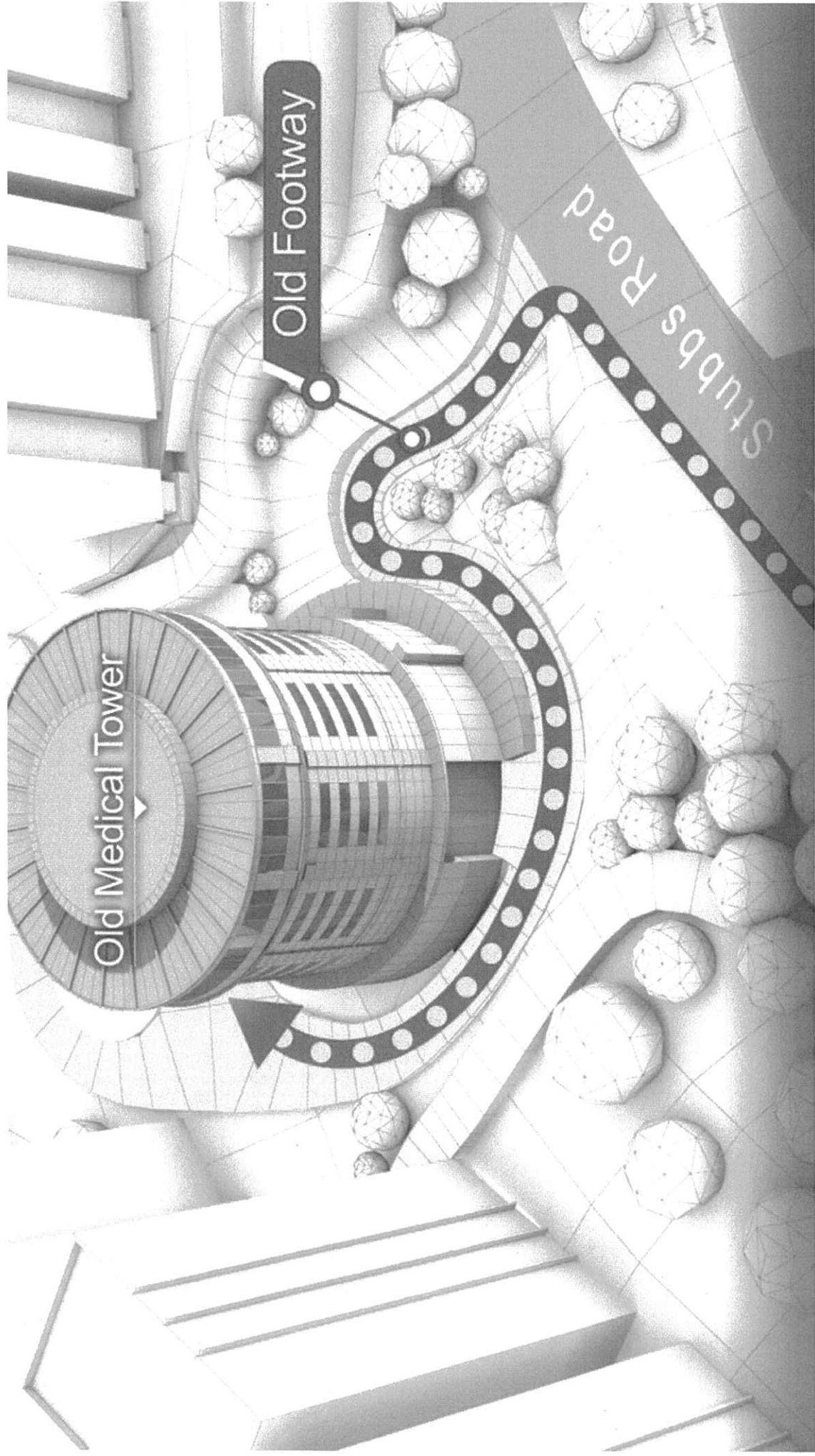
V4.1 of VIA – Existing View

Annex D

Proposed Pedestrian Flow



Current Pedestrian Flow



Proposed Pedestrian Flow



Attachment II

Responses-to-Comments table addressing comments from the Public

**APPLICATION FOR PERMISSION
UNDER SECTION 16 OF THE TOWN PLANNING ORDINANCE (CAP. 131)
FOR PROPOSED MINOR RELAXATION OF BUILDING HEIGHT RESTRICTION
FOR PERMITTED HOSPITAL REDEVELOPMENT
AT 40 STUBBS ROAD, HAPPY VALLEY
(SECTION 16 PLANNING APPLICATION NO. A/H14/82)**

Public Comments received from 23 March 2021 to 13 April 2021 Response(s) on the further information submitted on 12 March 2021		
1. <u>Excessive of Parking Facilities</u>	The proposed car parking provision is too excessive. The excessive number of car parks and loading bays would result in increase in traffic loading in the area. The provision of excessive car parking numbers not only contribute to bulk and density of the development, it also contradicts the Town Planning Board's traffic concerns and the OZP planning intention for the area.	The proposed car parking provisions are based on the Hong Kong Planning Standards and Guidelines by Planning Department to meet the Government latest requirement. With the review of the latest population and employment data from planning department, it is noted that there will be negative growth of population and employment in the Wan Chai and Southern District in the future years.
2. <u>Development Period</u>	Development period of 15 years in 3 phases is extensive. The construction noise, dirt and dust pollution, potential crimes and traffic delays caused by massive construction vehicles will pose a long period of disturbances to the area. There is no clear account of how the development will be physically phased, nor to what extent existing hospital services would be disrupted or suspended during the construction period. Whether the prolonged development programme is due to reasons such as the complexity of keeping existing hospital services in operation,	Besides the construction period for demolition/ foundation/ excavation/ superstructure works, the total 15 years of development also includes design period, statutory submission, pre-construction preparation works, decanting of existing services, fitting-out works, testing and inspection works, etc. In order to maintain the existing hospital operation and not to compromise the healthcare services provided, the Proposed Redevelopment will be redeveloped in 3 main phases to allow sufficient

Public Comments received from 23 March 2021 to 13 April 2021 on the further information submitted on 12 March 2021	Response(s)
or technical complexity in implementing the construction work, or due to financial constraints and cash-flow needed to finance the huge cost of site formation and building on their back slope should be explained. A shortened period should be explored.	time and space for decanting. Each phase will approximately take 3 – 4 years to complete. As Block 1 will be encroaching into the slope, excavation works will be carried out in the first two phases. The first phase involves the completion of partial portion of Block 1 (namely Block 1A). Part of the existing services including ward, car park, offices, canteen, staff facilities and other ancillary services would decant from La Rue Building and the Main Building to Block 1A. The second phase involves the demolition of the existing La Rue Building and the construction of remaining portion of Block 1 (namely Block 1B). There will be no provision of the existing staff quarter. After building Block 1B, the walls abutting Block 1A and Block 1B will be removed and interconnected on every floor to enhance operation and accessibility. Meanwhile, the remaining hospital services including wards, clinics and operation rooms and ancillary services such as pharmacy in the Main Building would relocate to Block 1B. The third phase mainly involves the redevelopment of the existing Main Building to Block 2 and the construction of lift tower. Block 2 will mainly be providing transport facilities in the future. 20m depth excavation is anticipated to connect with the level of Stubbs Road. A covered footbridge will be linked from Block 2 to the lift tower which leads to Stubbs Road It is understood that there may be adverse impacts to the hospital operation and surrounding during the construction phase. Hence, a

Public Comments received from 23 March 2021 to 13 April 2021 on the further information submitted on 12 March 2021	Response(s)
	series of mitigation measures will be employed to minimize the air and noise impacts. For air quality, a vehicle wheel and body washing facility shall be installed at the site exit to remove any dusty materials from wheels before leaving the site; vehicles arriving / leaving the site loaded with dusty materials shall be covered entirely by clean impervious sheeting; all dusty activities and materials shall be sprayed with water to dampen dust; open temporary stockpiles will be avoided; and any stockpile of dusty materials shall be covered entirely by impervious sheeting, and / or placed in an area sheltered on the top and 4 sides. For noise impact, the Applicant will limit the noise emission at source, avoid parallel operation of noisy equipment, provide noise barriers, carefully schedule the noisy activities and use quieter machine with silencers or mufflers. With the said mitigation measures, the hospital and school operation as well as the livelihood of the nearby residents will not be undermined.
3. <u>Need for Expansion</u> The hospital is a high-quality yet expensive hospital serving high income group. Moreover, no information shows that there is such a demand for bed spaces since the area is already supported by other private hospitals including Gleneagles Hospital, Hong Kong Sanatorium Hospital and St Paul's Hospital Rationale for the expansion and public interest consideration should be given.	The existing buildings were built in 1971 and 1979 and are getting old and out of context. The primary aim of the redevelopment of Hong Kong Adventist Hospital ("HKAH") is to upgrade the existing heavily-utilized medical facilities to maintain the provision of high-quality medical services for the patients. Through improving the building design and footprint, the Proposed Redevelopment can optimize the use of developed land and enhance the physical characteristics of the area. Furthermore, there is a general surging demand for bed space due to population growth, ageing population and change in age and disease

Public Comments received from 23 March 2021 to 13 April 2021 on the further information submitted on 12 March 2021	Response(s)
	specific service utilization. Currently, HKAH mainly offers generalist and specialist outpatient services with 135 bed spaces. With sufficient bed space and other additional hospital facilities, patients can receive more holistic treatments with inpatient care. Indeed, the recent pandemic has given us a lesson on the readiness of our medical system: it is crucial to adopt a precautionous approach to handle with unknown diseases in the future and in this sense, ample capacity is required to reduce the risk of cross infections. The applicant has conducted a survey regarding the expansion of HKAH in June 2020. Out of 1,080 respondents, nearly 70% of respondents support the redevelopment of HKAH. 88% respondents from Wan Chai district support the redevelopment of HKAH. Over 80% agree that Hong Kong lacks bed spaces to meet with the demand in the next decade whereas 95% of respondents agree that more bed spaces are needed. Taken the opportunity to proposed minor relaxation of building height, despite being a private hospital, the Proposed Redevelopment helps alleviate public hospitals' pressure by providing extra 96 bed spaces and other advanced medical facilities. Upon completion, the number of 3rd class bed spaces will be increased from 54 to 92 (+70%). In particular, HKAH will provide private comprehensive hospital medical and surgical services with emphasis on Cardiac services, Orthopedic services, and Oncology Services.

Public Comments received from 23 March 2021 to 13 April 2021 on the further information submitted on 12 March 2021	Response(s)
4. <u>In Contravene of the Planning Intention</u> AH's proposed plot ratio of 5.59 is double the average in the area and therefore too excessive for the area. Considering that the original planning intention of the OZP is to maintain the mid-rise and mid-density character of the neighbourhood, AH's scheme is clearly contradicting the OZP planning intention. The plot ratio of 5.59 and a site coverage of 56.03% have contributed to the excessive bulk and height of Block 1 of the proposed hospital. In view of the OZP's original planning intention of maintaining mid-rise, medium density character of the neighborhood, the application to relax AH's height restriction is too excessive and should not be approved.	The application site falls within the "Government, Institution or Community" ("G/I/C") zone on the approved The Peak Outline Zoning Plan No. S/H14/13 ("the OZP"). According to the Notes of OZP, the planning intention of the subject "G/I/C" zone is primarily for the provision of Government, institution or community facilities serving the needs of the local residents and/or a wider district, region or the territory. It is also intended to provide land for uses directly related to or in support of the work of the Government, organization providing social services to meet community needs, and other institutional establishments. Whilst there is no planning restriction on the site coverage and plot ratio of the subject "G/I/C" zone, the permitted site coverage and plot ratio for the Proposed Redevelopment are 60% and 15 respectively based on the Building (Planning) Regulations. The Proposed Redevelopment is generally in line with the planning intention and is of compliance with the development restrictions. Since all proposed building blocks will not be exceeding 16 storeys, the Proposed Redevelopment is in line with the planning intention of maintaining mid-rise character of the area. It is noted that the surrounding residential buildings are mostly zoned "Residential (Group B)" with the planning intention for medium-density residential developments, which is inherently different from the Application Site. Therefore, the development restrictions may vary, and each development shall be considered on an individual basis.

Public Comments received from 23 March 2021 to 13 April 2021 on the further information submitted on 12 March 2021	Response(s)
5. <u>Building Height Restriction</u> HKAH's current Planning application is to ask the TPB for permission to relax the OZP height restriction on their redevelopment plan from 190.518mPD to 212.918mPD (22.4m higher), adding 5 storeys of hospital floors above the existing height limit. It is equivalent to 6-7 storeys in a domestic building (assuming 3.2m per storey). Bellevue Court, immediate neighbour AH's site on the north is subject to OZP height restriction to its existing height of 189.42mPD (measured to highest roof level). AH application to relax and increase their height restriction, if approved, shall be 23.498m above the maximum height of Bellevue Court, meaning that AH height would be 7 domestic storey higher than Bellevue Court. Woodland Height, neighbour to AH south boundary, is also subject to OZP height restriction. According to figure V.3.3 of AH's planning application document, it has an existing max. height of 195mPD. Consequently, AH's proposed new height of 212.918mPD will be 17.918m higher than Woodland Height, which is equivalent to about 5.56 domestic storeys. In other words, AH's application to relax the OZP height restriction compliance would result in its redevelopment protruding dominantly above its neighbouring development.	The Applicant is currently applying for a minor relaxation of BHR from 190mPD to 208.168mPD (+9.562%) for the respect of southwestern portion of the Application Site. The proposed Block 1 (208.168mPD) will be slightly higher than the existing hospital building - La Rue Building by additional 3 storeys. Location of proposed Block 1 is being setback and the associated E&M equipment on roof will be placed away from adjacent buildings. Building separation between the proposed buildings and adjoining residential blocks remain the same as existing and widened separation (15m) between Block 1 and Woodland Height is allowed. The proposed Block 2 (171.3mPD) next to Woodland Height (195mPD) and Bellevue Court (186mPD) will remain much lower than its neighbourhoods and lower than the existing hospital block (172mPD). Proposed higher building heights, 10 to 16 storeys are currently proposed for the hospital blocks. Unlike domestic development, high floor to floor level is required for hospital operation. The proposed minor relaxation of building heights is necessary to meet the needs for operation advancement.

Public Comments received from 23 March 2021 to 13 April 2021 on the further information submitted on 12 March 2021		Response(s)
6. <u>Site Coverage</u>	In the AH planning application document, there is no data provided for comparison of site coverage of various buildings in the neighbourhood. Bellevue Court is an example of typical development built in the 1960s. Bellevue Court's site coverage, 27.5% is used to compare with the site coverage of the AH proposal. It is therefore concluded that AH's coverage is way too excessive in relation to the site coverage of the neighbouring development and therefore much be reduced. The high site coverage is one of the reasons why AH's redevelopment is looking so visually dense, and why its upper Block had to build up to its edge boundaries, as well as the car parking building fronting Stubbs being so bulky in size.	The Proposed Redevelopment will provide abundant pleasant and relaxing open space to be enjoyed by patients, staff and visitors. Vertical element and two sky gardens in Block 1 and edge plantings on each floor in Block 2 will seemingly soften the building line and reduce the bulkiness. The Proposed Redevelopment will blend in well with the surrounding environment and local character with replanted trees. Whilst there is no planning restriction on the site coverage and plot ratio of the subject "G/IC" zone, the permitted site coverage and plot ratio for the Proposed Redevelopment are 60% and 15 respectively based on the Building (Planning) Regulations. The Proposed Redevelopment is generally in line with the planning intention and is of compliance with the development restrictions.
7. <u>Visual Incompatibility</u>	The new scheme with the street fronting lift tower, wide elevation of Block 2 and fully stretched elevation of Block 1 across the entire width of the site, present a hard-looking bulk of building fronting Stubbs Road and the neighbourhood. AH should consider to conserve the existing building instead. The proposed free-standing front Lift Tower is a visually dominant and not in character with the visual context of the neighbourhood.	The Lift Tower and Block 2 are with +151.5mPD and +171.3mPD respectively, which are lower than the maximum height restriction of OZP. Proposed Block 1, Block 2 and lift tower create a step down and decreasing bulk of building profile from the green knoll to Stubbs Road. Efforts have been made to enhance the building separation on both sides of the Proposed Redevelopment to maintain the visual openness from Stubbs Road and the neighbourhood. Lift tower with Approx. +151.5mPD is lower than the maximum height of OZP compliance scheme (+165mPD) and lower part of the lift tower is screened by preserved trees on the slope and modified retaining wall

Public Comments received from 23 March 2021 to 13 April 2021 on the further information submitted on 12 March 2021		Response(s)
		along Stubbs Road. Hence the development edge will be softened. Proposed lift tower is necessary to improve the accessibility to the hospital for all ages which is currently not provided. Its location and appearance will be further developed at detailed design stage to reduce its visual prominence.
8. <u>Tree Preservation</u> The drawing of the new Landscape Proposal shows that only a small number of existing trees outside AH retaining wall boundary on Stubbs Road will be preserved. The tree preservation area does not seem to cover the existing mature trees located inside the retaining wall to the south of the car entrance within the AH boundary, nor the existing mature trees that are currently located on the north (right side) of the entrance. The location of proposed new Lift tower and Terraced Garden behind the existing retaining wall on south side of the car entrance as well as the Courtyard Garden on the north side of the car entrance would necessitate the felling of most of the existing mature trees in the two areas. Bellevue Courts find that felling of these trees would be unacceptable in the interest of environment protection and tree preservation.		Refer to the tree survey report, only a few trees inside AH at the site entrance are affected and it is inevitably to be preserved to accommodate the EVA/ access improvement works for the Hospital. Existing trees outside AH to the north on slope would not be affected. Tree affected at the site entrance are not mature specimen. Majority of them are contained by concrete tree ring or structures making them not grown in good condition and form. These trees have evidence of tree defects including leaning/unbalance form, sparse leaves and die back etc., hence they are not suitable and good specimen for tree retention. As a result of HKAH site entrance improvement works, these defective trees will be replaced by good quality trees in proposed terraced gardens alongside of the site access. Green entrance to AH and the amenity in views from their neighbourhood is hence being reinstated and enhanced.

Similar Application for minor relaxation of building height within “G/IC” zone
Under The Peak Area Outline Zoning Plan

<u>Application No.</u>	<u>Development</u>	<u>Date of Consideration</u>	<u>Rejection Reasons / Approval Conditions</u>
Approved Application			
A/H14/62	Proposed Minor Relaxation of Building Height Restriction (from 5 storeys to 6 storeys) for permitted Hospital use at Matilda & War Memorial Hospital	23.12.2010 Approved with conditions by the Metro Planning Committee (MPC) of the Town Planning Board (TPB)	(a)

Approval Condition:

- (a) the provision of water supplies for fire-fighting and fire service installations to the satisfaction of the Director of Fire Services or of the TPB.

3. Feb. 2020 11:19

1. Creation

Public Comments

No. 1-28

5-1

致城市規劃委員會秘書：

專人送達或郵遞：香港北角海邊樓道 313 號北角政府合署 15 樓

傳真：2877 0245 或 2522 8426

電郵：tpbpd@pland.gov.hk

To : Secretary, Town Planning Board

By hand or post : 15/E, North Point Government Offices, 313 Java Road, North Point, Hong Kong

By Fax : 2877 0245 or 2522 8426

By e-mail : tpbpd@pland.gov.hk

3

有關的規劃申請編號 The application no. to which the comment relates

A/H14/82

意見詳情 (如有需要，請另頁說明)

Details of the Comment (use separate sheet if necessary)

Dear Sir / Madam:

I wish to reply to your proposal is insufficient. I only received the TPB's letter from your management company last Thursday. 2/2/2020.

After reviewing HKH's redevelopment proposal, I do not believe such a large scale development is fitting for the neighbourhood. While I appreciate HKH's wish to serve the community, it is not a public hospital and is no over-relying public need to only those infrastructure.

「提案人」姓名/名稱 Name of person/company making this comment Michelle Tam

簽署 Signature Michelle Tam 日期 Date 6 February 2020

means will visit and use the hospital's facilities. Given that including ambulance, we already have four private hospitals, all in close vicinity. Both Queen's + HK Sanatorium hospitals hold 500 beds each while Matilda hospital has 99 beds. Canossa hospital has 403 beds. So there a need for more beds when the government doesn't allow for more medical professionals from overseas when we already have a shortage. Traffic post construction is by serious consideration as I often witness gridlock outside HK Sanatorium due to lacking parking facilities & larger number of cars entering the hospital. The HKH's two hospitals, Matilda + Canossa, located in residential neighbourhoods did not increase their space footage - 2 - as much HKH's proposal. HKH's currently has 152 beds.

3 Feb 2020 11:19:11: I will that this redevelopment will result in substantial square footage loss. That have been on HKH property for many years! I really feel redevelopment will result in substantial square footage loss. I believe will block out our complete. High cliff disaster! Please do not repeat the

5-2

就規劃申請覆核後提出意見 Making Comment on Planning Application / Review	
參考編號 Reference Number:	200209-195926-52997
提交限期 Deadline for submission:	11/02/2020
提交日期及時間 Date and time of submission:	09/02/2020 19:59:26
有關的規劃申請編號 The application no. to which the comment relates:	A/H14/82
「提意見人」姓名/名稱 Name of person making this comment: 女士 Ms. Wendy Song	
意見詳情 Details of the Comment:	
To Secretary, Town Planning Board	
Dear Sir/Madam,	
I OBJECT to Adventist Hospital's application to Minor Relaxation of Building Height -	
1. Traffic Impact - 184 carpark spaces with 7 loading bays for ambulances, emergency vehicles, taxis and buses will cause a MAJOR IMPACT on the currently heavy traffic in the area. The traffic at the round-about is already terrible, traffic going downhill along Stubbs Road is especially heavy in the afternoon. Kindly note that in 2003, the Board stated that "the plot ratio is to avoid overtaxing the local road system. Increase in the development intensity in the uphill would adversely affect the traffic condition in the downhill area." (Board's reply to Bellevue Court TPB/O/S/H14/6-3)	
2. Development period of 15 years?! Think about the construction noise, dirt and dust pollution, potential crimes and traffic delays caused by massive construction vehicles. Such an extensive period of construction time is absolutely UNACCEPTABLE to the nearby residents.	
3. Does the community really need the extra beds and services? The nearby Gleneagles Hospital opened just recently. There is the HK Sanatorium Hospital in Happy Valley, St Paul's Hospital, also expanded not too long ago. Matilda Hospital and Camosa Hospital are also not too far away.	
4. Not only the nearby residents will be affected. Joggers, visitors and elderly who walk and exercise daily along the scenic Bowen Road will no longer be able to enjoy fresh air and the tranquility of the area.	
I sincerely ask the Board to REJECT Adventist Hospital's application.	

5-3

就規劃申請覆核後提出意見 Making Comment on Planning Application / Review	
參考編號 Reference Number:	200209-114532-24023
提交限期 Deadline for submission:	11/02/2020
提交日期及時間 Date and time of submission:	09/02/2020 11:45:32
有關的規劃申請編號 The application no. to which the comment relates:	A/H14/82
「提意見人」姓名/名稱 Name of person making this comment: 夫人 Mrs. Rushabh Kothari	
意見詳情 Details of the Comment:	
In 2003, The Planning Department imposed a restriction of plot ratio (all future developments to be no more than what is allowed in existing development) to all 7 numbers of R(B) 1 sites along Wong Nai Chung Gap Road and Upper Stubbs Road of which Bellevue Court was one of the chosen sites. Owners of Bellevue Court objected to this and were rejected for various reasons some of which are summarised below.	
a) Development Restrictions - The OZP's intention of the area is to maintain a pre-dominant medium density and medium rise character and to preserve public view and protect the ridge line.	
b) The OZP plot ratio restrictions, is to avoid overtaxing the local road system as increasing development intensity would increase and overburden the traffic situation.	
c) Object to the lifting of the Outline Zoning Plan (OZP) Height Restriction on Adventist Hospital (its AH) proposed scheme for the following reasons.	
1) The lifting of the height restriction for AH would effectively allow for a plot ratio of 2.59. This is much higher than the neighbouring buildings such as Woodland Heights, Bellevue Court et al.	
2) The original intention of the OZP was to maintain mid-rise and medium-density of the neighbourhood, this scheme is evidently contradicting this very intention.	
3) The very high plot ratio as well as the proposal of 184 carparks is excessive as it will increase the traffic loading in the area. In recent years, the traffic in Lower Stubbs Road right up to Upper Stubbs Road has been worsening. By approving this much higher plot ratio with several car parks, this situation will add a large burden to the already worsening traffic in Stubbs Road. This will also be one of the major reasons for rejection of neighbouring sites' (such as Bellevue Court) application to relax the plot ratio and height restriction in 2003.	
4) The unusually long project being estimated at over 15 years is unacceptable to its neighbours. This pro-longed redevelopment programme, would be very uncomfortable such as the noise pollution, dust pollution, the extra traffic created caused by truck deliveries. I am not sure why there is such a long redevelopment programme as there isn't any information as to the reason why but in any case we find this insensitive to the site's inherent character as per the OZP.	
5) Finally, I feel it would be unfair to allow this scheme with such a vastly different plot ratio and height coverage compared to other sites in the area. There is no mention of any data provided for comparison of site coverage of buildings in the neighbourhood in AH's document. If we use Bellevue Court as an example, the site coverage of 27.5% is around half of what is being proposed by the AH scheme. We do not think it is equitable that many buildings surrounding AH have to rebuild at a plot ratio and height around half of what is being suggested by the AH site. This gain goes against the reasons stated in 2003 about this specific area.	
Thank you.	

5-4

就規劃申請/覆核後提出意見 Making Comment on Planning Application / Review	
參考編號 Reference Number:	200208-163229-28953
提交限期 Deadline for submission:	11/02/2020
提交日期及時間 Date and time of submission:	08/02/2020 16:32:29
有關的規劃申請編號 The application no. to which the comment relates:	A/H14/82
「提意見人」姓名/名稱 Name of person making this comment:	先生 Mr. TANG SHUN LA M
意見詳情 Details of the Comment :	
We object Advantist Hospital's application to lift the height restriction. As we understand, the density of the proposed buildings is already very high. To add the height, means more population being added to the current heavy traffic to the area causing traffic congestions and environmental hazards. It is highly unfair to all other buildings in the area since the same height restriction imposed by the Building Authority to the neighboring buildings. The vast number of car parks introduce even more traffic and environmental problems. We also object to allow the project to last for 15 years. It shows the project is over sized and contradict the city planning objective of low density living environment. The noise and pollution that the neighborhood will suffer should not be extend to such a prolong period of time. It is not only inhumane but also unhealthy. Also it adds a lot of construction traffic over an extended period of time.	

5-5

就規劃申請/覆核後提出意見 Making Comment on Planning Application / Review	
參考編號 Reference Number:	200208-163825-57651
提交限期 Deadline for submission:	11/02/2020
提交日期及時間 Date and time of submission:	08/02/2020 16:38:25
有關的規劃申請編號 The application no. to which the comment relates:	A/H14/82
「提意見人」姓名/名稱 Name of person making this comment:	先生 Mr. Christopher Tang
意見詳情 Details of the Comment :	
We object Advantist Hospital's application to lift the height restriction. As we understand, the density of the proposed buildings is already very high. To add the height, means more population being added to the current heavy traffic to the area causing traffic congestions and environmental hazards. It is highly unfair to all other buildings in the area since the same height restriction imposed by the Building Authority to the neighboring buildings. The vast number of car parks introduce even more traffic and environmental problems. We also object to allow the project to last for 15 years. It shows the project is over sized and contradict the city planning objective of low density living environment. The noise and pollution that the neighborhood will suffer should not be extend to such a prolong period of time. It is not only inhumane but also unhealthy. Also it adds a lot of construction traffic over an extended period of time.	

5-6

就規劃申請/覆核後提出意見 Making Comment on Planning Application / Review	
參考編號 Reference Number:	200209-165909-46535
提交限期 Deadline for submission:	11/02/2020
提交日期及時間 Date and time of submission:	09/02/2020 16:59:09
有關的規劃申請編號 The application no. to which the comment relates:	A/H14/82
「提意見人」姓名/名稱 Name of person making this comment:	夫人 Mrs. Nancy Koo Zau
意見詳情 Details of the Comment:	
1) object to letting AH lifting the height restriction. 2) doing so would let AH build their development too dense, as reflected in their high Plot ratio and high site coverage 2) Too many car parks. (184!) It would strain the local traffic especially downhill 3) Development period over 15 years is too long, the large size and technical complication and cost factor probably contribute to this. 4) their oversize development contradicts the original planning intention of maintaining Mid density and mid-rise character of the area. 5) It is inequitable to all the adjacent owners, if they raise the height limit for AH while we all have to rebuild to half of AH plot ratio, coverage and existing height.	

5-7

就規劃申請/覆核後提出意見 Making Comment on Planning Application / Review	
參考編號 Reference Number:	200209-114721-62101
提交限期 Deadline for submission:	11/02/2020
提交日期及時間 Date and time of submission:	09/02/2020 11:47:21
有關的規劃申請編號 The application no. to which the comment relates:	A/H14/82
「提意見人」姓名/名稱 Name of person making this comment:	夫人 Mrs. Haretil Kothari
意見詳情 Details of the Comment:	
In 2003, The Planning Department imposed a restriction of plot ratio (all future developments to be no more than what is allowed in existing development) to all 7 numbers of R(B) 1 sites along Wong Nai Chung Gap Road and Upper Stubbs Road of which Bellevue Court was one of the chosen sites. Owners of Bellevue Court objected to this and were rejected for various reasons some of which are summarised below. a) Development Restrictions - The OZP's intention of the area is to maintain a pre-dominant medium density and medium rise character and to preserve public view and protect the ridge line. b) The OZP plot ratio restrictions, is to avoid overtaxing the local road system as increasing development intensity would increase and overburden the traffic situation. c) Object to the lifting of the Outline Zoning Plan (OZP) Height Restriction on Adventist Hospital (AH) proposed scheme for the following reasons. 1) The lifting of the height restriction for AH would effectively allow for a plot ratio of 5.59. This is much higher than the neighbouring buildings such as Woodland Heights, Bellevue Court etc. As the original intention of the OZP was to maintain mid-rise and medium-density of the neighbourhood, this scheme is evidently contradicting this very intention. 2) The very high plot ratio as well as the proposal of 184 car parks is excessive as it will increase the traffic loading in the area. In recent years, the traffic in Lower Stubbs Road right up to Upper Stubbs Road has been worsening. By approving this much higher plot ratio with several car parks, this situation will add a large burden to the already worsening traffic in Stubbs Road. This will also be one of the major reasons for rejection of neighbouring sites' (such as Bellevue Court) application to relax the plot ratio and height restriction in 2003. 3) The unusually long project being estimated at over 15 years is unacceptable to its neighbours. This pro-longed redevelopment programme, would be very uncomfortable such as the noise pollution, dust pollution, the extra traffic created caused by truck deliveries. I am not sure why there is such a long redevelopment programme as there isn't any information as to the reason why but in any case we find this insensitive to the site's inherent character as per the OZP. 4) Finally, I feel it would be unfair to allow this scheme with such a vastly different plot ratio and height coverage compared to other sites in the area. There is no mention of any data provided for comparison of site coverage of buildings in the neighbourhood in AH's document. If we use Bellevue Court as an example, the site coverage of 27.5% is around half of what is being proposed by the AH scheme. We do not think it is equitable that many buildings surrounding AH have to rebuild at a plot ratio and height around half of what is being suggested by the AH site. This is a gain goes against the reasons stated in 2003 about this specific area. Thank you.	

致城市規劃委員會秘書：

專人送遞或郵遞：香港北角達華道 333 號北角政府合署 15 樓

傳真：2877 0245 或 2522 8426

電郵：tpbd@pland.gov.hk

5-8

By email or by hand

Feb 9 Feb 10

To : Secretary, Town Planning Board

By hand or post : 15/F, North Point Government Offices, 333 Java Road, North Point, Hong Kong

By Fax : 2877 0245 or 2522 8426

By e-mail : tpbd@pland.gov.hk

有關的規劃申請編號 The application no. to which the comment relates

A/H14/82

意見詳情 (如有需要，請另頁說明)

Details of the Comment (use separate sheet if necessary)

See page attached

「提意見人」姓名/名稱 Name of person/company making this comment Bellevue Court, Block A

簽署 Signature

日期 Date

8 Feb 2020

For and on behalf of
THE INCORPORATED OWNERS OF BELLEVUE COURT BLOCK A

代表 已 法 律 公 司 集 法 團
THE INCORPORATED OWNERS
OF BELLEVUE COURT, BLK. A

For and on behalf of
The Incorporated Owners of Block C,
Bellevue Court

代表 已 法 律 公 司 集 法 團
THE INCORPORATED OWNERS
OF BELLEVUE COURT, BLK. B

Wendy Lee

Authorized Signature(s)

TONY WONG

Authorized Signature

VICTOR TONG

Comments on/ Objection of Adventist Hospital's application for Minor Relaxation of Building Height Relaxation for Permitted Hospital Use, 40 Stubbs Road, Hong Kong (Planning Application A/H14/82)

To: the Planning Department, North Point Government Offices, 333 Java Rd., Hong Kong

Details of Comments / Objection submitted By The Incorporated Owners of Bellevue Court Block A, B & C, (Supplementary Sheet)

We refer to the above Planning Application (A/H14/82) and would like to express our objection to Adventist Hospital's (AH) application for Building Height Relaxation and related details of the proposed design.

Our comments on and grounds of our objection are as follows.

1 Adventist Hospital's proposed Plot Ratio, Height Limit of building, Site Coverage & Car Parking numbers

1.0 Key data of AH's proposed redevelopment scheme:

1.0.1 Plot ratio of 5.59 (ratio of Site Area : Gross Floor Area)

1.0.2 Proposed relaxation of height restriction to 208.168 meter above Principal Datum (PD). (Outline Zoning Plan height restriction is around 189 meter above PD, similar to Bellevue Court's)

1.0.3 Site Coverage of 56%

1.0.4 A total number of car parking spaces for 184 cars park + 7 lay-bys for loading/unloading of taxis, ambulances, light buses etc.

1.1 Bellevue Court's Objection The Peak Area Outline Zoning Plan (OZP) No. S/H14/6

1.1.1 In 2003, Town Planning Department's Peak Area OZP Imposed an "Existing Bulk" restriction of plot ratio (i.e. future redevelopment to be no more than what is existing in a development) and upper limit of building heights to "existing building heights" to all 7 numbers of R(b)1 sites along Wong Nai Chung Gap Road and Upper Stubbs Road in the neighbourhood. Bellevue Court was one of the sites affected.

1.1.2 Individual owners and the Incorporated Owners Bellevue Court, alongside with other site owners in the neighbourhood submitted objections of the draft OZP to the Town Planning Board.

1.1.3 Bellevue Court's reasons for their objection were that majority of the restricted sites in the area were over 40 to 50 years old and were due for redevelopment. The newly Imposed Height and Plot Ratio restrictions

would practically dampen any future potential developer's interest and incentive in redeveloping the sites affected by the OZP.

1.1.4 Furthermore, owners of Bellevue Court argued that it was inequitable for the government to have allowed 2 towers at 41C and 41D Stubbs Road to build to high plot ratios (5 and 8 respectively) and to excessively tall heights (67 & 69 storeys), and then afterwards harshly restricted Plot Ratio of the remaining 7 sites to existing bulk and heights. (Likewise, Nicholson Tower, was also permitted in the past to build up 30 storeys and to a plot ratio of 5.1.)

1.2 Rejection of Bellevue Court's owners objection by the Town Planning Board (TPB)

1.2.1 After a meeting held on the 14th March 2003, The Town Planning Board rejected Bellevue Court's and various neighbourhood owners' objections, stating the following grounds in their reply letters (See Attachment A – letter from Town Planning Board to the Incorporated Owners of Bellevue Court Block A – Ref. TPB/O/5/H14/6-3-)

1.2.2 The two "super-tall towers at 41C and 41D Stubbs Road were incompatible with the pre-dominant medium density and medium-rise development character of the area.

1.2.3 TPB further explained that the restrictions of Plot Ratio and Heights (to existing bulk) on the R(B)1 zone sites, which in Bellevue Court were to "maintain this existing pre-dominant character of the area", and to "preserve public views" and to "protect the ridge line" (behind the sites as seen from afar)

1.2.4 The plot ratio restriction is "to avoid overtaxing the local road system". Increase development intensity in the uphill area "would adversely affect the traffic in the downhill area".

1.2.5 Development restrictions stipulated in the OZP is "to reflect the planning intention of the area".

1.2.6 Proposed Rezoning (by Bellevue Court and other objectors proposed an alternative higher plot ratio and height limit) would create an undesirable precedent. The cumulative effect of approving similar rezoning would result in adverse traffic impact and would change the medium rise, medium density character of the area.

1.2.7 In summary, the Planning Intentions behind the Outline Zoning Planning as endorsed by the Town Planning Board's meeting and subsequent hearing, can be clearly summarised as follows:

1.2.7.1 The super-tall developments of the Summit & Highcliff (41C and 41D Stubbs Road respectively) and by implication should include also the 30 storey towers of Nicholson Tower are considered incompatible with development character of the area.

1.2.7.2 Development restrictions (of Plot Ratios and Heights), stipulated in the OZP is to reflect the planning intention of the area, which is to maintain the pre-dominant medium density and medium-rise character of the area, to preserve public view and to protect the ridge line (of the hill behind)

1.2.7.3 The OZP plot ratio restrictions is also to avoid overtaxing the local road system. Increase in development intensity would adversely affect the traffic downhill from the subject area.

1.3 Existing development details of the existing sites in the neighbourhood

Sites	Ex. Plot Ratio	Ex. Height (storeys)
41 Stubbs Rd (Bellevue Court)	3.8	13s & 14s
41D Stubbs Rd * (Highcliff)	8.0 *	69s
41C Stubbs Rd * (The Summit)	5.0 *	67s
41A Stubbs Rd (Villa Monte Rosa)	3.0	21s & 22s
43 Stubbs Rd (Evergreen Villa)	3.0	18s, 20s, 21s
43A Stubbs Rd (Victoria Heights)	3.0	24s
2 Wong Nai Chung Gap Rd (Woodland Heights)	2.6	16s
4A-D Wong Nai Chung Gap Rd (Valley View)	1.7	9s
6-10 Wong Nai Chung Gap Rd ** (Nicholson Tower)	5.1 **	30s
12-14 Wong Nai Chung Gap Rd (Leon Court)	3.1	12s

* Town Planning Board considered Plot Ratio excessive and incompatible with neighbourhood's mid-density, mid-rise character.

** This should also be considered incompatible with neighbourhood character as it is 30 storeys tall

2.0 Detail grounds for Bellevue Court's Objections

2.1 The essence of Bellevue Court Objection and comments is are as follows:

2.1.1 AH's application for Relaxation of Height Restrictions

AH's current Planning application is to ask the TPB for permission to relax the OZP height restriction on their redevelopment plan from 190.518 m PD to 212.918 m PD (22.4m higher), adding 5 storeys of hospital floors above the existing height limit. This is equivalent to 7 storeys in a domestic building (assuming 3.2m per storey).

Bellevue Court, immediate neighbour AH's site on the north, is subject to OZP height restriction to its existing height of 189.42 m PD (measured to highest roof level). AH application to relax and increase their height restriction, if approved, shall be 23.498 m above the maximum height of Bellevue Court, meaning that AH height would be about 7 domestic storeys higher than Bellevue Court.

Woodland Height, neighbour to AH south boundary, is also subject to OZP height restriction. According to Figure V.3.3 of AH's planning application document, it has an existing max. height of 195m PD. Consequently, AH's proposed new height of 212.918 m PD will be 17.918m higher than Woodland height, which is equivalent to about 5.56 domestic storeys.

In other words, AH's application to relax the OZP height restriction would result in it redevelopment protruding some 23.5m and 18m (7 and 5.5 storeys) respectively higher than its neighbouring building heights.

In view of the OZP's original planning intention mentioned in section 1.2.7.1 to 1.2.7.3 above, the application to relax AH's height restriction is too excessive and should not be approved.

2.1.2 Excessive Plot Ratio

It should be aware that the lifting of AH's height restriction not only would result in their new development protruding above its two neighbour buildings, it would indirectly result in enabling AH's scheme to achieve a plot ratio of 5.59 for their development.

Referring to Table 1.3 above, apart from the 2 tall towers of Highcliff (plot ratios of 8 in 69 storeys) and The Summit (plot ratio 5 in 67 storeys), as well as Nicholson Tower (plot ratio 5.1 in 30 storeys), the majority of plot ratio restriction of the remain residential buildings sites along the neighbouring stretch of Stubbs Road and Wong Nai Chung Gap Road ranges from 1.7 to 3.8, with an average of 2.89. AH's proposed plot ratio of 5.59 is obviously too excessive in the area.

It should be noted also that this high plot ratio, together with the extra height and site coverage discussed below, if approved, will collectively contributed to the visual bulk of the hospital building. (see application document: figure V3.3/- viewpoint C).

Considering that the original planning intention of the OZP is to maintain the Mid-rise and Mid-density character of the neighbourhood, AH's scheme is clearly contradicting the OZP planning intention. The scheme should not be approved we see a reduction of its plot ratio, height and site coverage compatible with other sites in the area.

2.1.3 Excessive Site Coverage

In the AH planning application document, there is no data provided for comparison of site coverage of various buildings in the neighbourhood. Bellevue Court is an example of typical development built in the area in the 1960s. We therefore use Bellevue Court's site coverage to compare with the site coverage of the AH proposal.

The site coverage in the AH scheme is 56.03%, while the Bellevue Court existing site coverage is 27.5%, about half of AH's proposal.

This high site coverage is one of the contributory reasons for why AH's redevelopment is looking so visually dense, and why its upper two blocks (A&B) had to be built up to its edge boundaries, as well as the car park building fronting Stubbs being so bulky in size. (see figure 1.1 and V3.3-viewpoint C).

We therefore conclude that AH's coverage is way too excessive in relation to the site coverage of the neighbouring development and therefore must be reduced.

2.1.4 Excessive Car Park Provisions

The proposed provision of 184 carparks and 7 loading bays in the proposal is also excessive.

The additional car parks and loading bays on a total 10 levels served by a very tight access ramp would result in increase in traffic loading in the area. The provision of excessive car parking numbers not only contribute to bulk and density of the development, it also contradicts the Town Planning Board's traffic concerns and the OZP planning intention for the area. (see sections 1.2.4 and 1.2.7.3 above) This was one of the major reasons for the rejection of the previous neighbouring sites' applications to relax the plot ratio and height restriction stipulated by the OZP in 2003.

We therefore conclude that the number of carparking and loading bay is far too excessive and the TPB should not approved.

2.1.5 Undesirable visual impact of the redevelopment on the neighbourhood environment character

The proposed scheme is presenting an harsh looking block of carpark and access ramp (Block C) with a detached, visually intrusive lift tower fronting Stubbs Road, (see figure 1.1 and V3.3/- photomontage viewpoint C)

AH's new block C and tower is visually at odd with the existing relationship of road and residential buildings, which, are mostly build on elevated terraces obscured, set back and lined by lush old trees and natural stone walls along the subject stretch of Stubbs Road and Wong Nai Chung Gap Road.

The proposed detached free standing front Lift Tower designed to be right in front of AH's future Block C is an unnecessary visually dominant and intrusive feature. This is foreign and not in character with the visual context of the neighbourhood.

In conclusion, the design scheme fronting Stubbs Road demonstrates the visual insensitivity and lack of respect to the character of the neighbourhood.

2.1.6 No proposal shown to preserve the mature trees on the existing site

From AH's proposed schematic landscape drawings (figure 1.1), there is no evidence of consideration being given to preserve the numerous decades-old mature trees currently lining on both sides of the existing road level entrance and along the access road leading up to the current hospital building.

We are of the opinion that felling of these trees would be extremely unacceptable in the interest of environmental protection and tree preservation in the neighbourhood.

2.1.7 The unreasonable long construction programme

The 3 phase long project programme stretching over 15 years in 3 phases for a private redevelopment of its scale is unacceptable to its neighbours.

The pro-longed redevelopment programme would post an unnecessary long period disturbances to the area in terms of nuisance cause by construction noise, dirt and dust pollutions, potential crime and security issues, as well as traffic delays caused by truck deliveries and utility connections work etc.

We are not sure of the reason behind its abnormally long redevelopment programme (15 year in 3 phases) and there is no clear and detailed account of how the development will be physically phased, nor to what extent existing hospital services would be disrupted or suspended during the construction period.

We are not certain why AH needs such an abnormally the long redevelopment time and phasing programme. Whether it is due to reasons such as the complexity of keeping existing hospital services in operation, or technical complexity in implementing the construction work, or due to financial constraints and cash-flow needed to finance the huge cost of site formation and building on their back slope, it all points to the possibility that AH's complex redevelopment is over-sized and over-ambitious.

In any case, the proposal is the insensitive to the site's inherent character and constraints and it contravenes to the planning intention of the Outline Zoning Plan of the area.

2.2. Is Adventist Hospital redevelopment plan fully benefit the community at large?

The AH stated that the redevelopment would increase 70% more beds provision to meet the needs to the community.

However, there is no objectively proven evidence that such demand is so large that it renders for the Town Planning Board to approve the relaxation of OZP height restriction which would result in endorsing such a high density of development in the area.

The reasons for our questioning of the over-size, over-ambitious nature of the AH redevelopment proposal is as follows:

2.2.1 Adventist Hospital is high quality but very expensive private hospital, affordable by and benefiting only high-net worth individuals and executives of large companies in the community, and not the general public at large.

2.2.2 The proximity of site location on Hong Kong Island is not short of private hospitals. Examples are:

- A Gleneagles Hospital at lower Nam Fung Road (500 beds)
- B St. Paul's Hospital, with its recently built extension at the bottom of Tai Hang Road (400 beds)
- C HK Sanitorium & Hospital in Happy Valley (480 beds)

In addition there are also the old private Matilda Hospital at the Peak and Caritas Canossa Hospital in Old Peak Road Central.

2.2.3 In view of the above and the undesirability of AH's over-size proposal we strongly recommend that AH's project should be cut back to a more reasonable size with plot ratio, site coverage and heights (not to exceed the OZP height) that can commensurate and enhance the character and suburban quality of the neighbourhood.

Attachment A (3 of 9)

城市規劃委員會
香港北角海邊道三百三十三號
北角政府合署十五樓

TOWN PLANNING BOARD
15/F., North Point Government Offices
333 Java Road, North Point,
Hong Kong.

傳 真 Fax: 2877 0245 or 2522 8128

電 話 Tel: 2231 4810

本處接獲 Your Reference:

查閱前投訴本會編號

In reply please quote this ref: TPB/O/S/H/14/6-3

By Registered Post

28 March 2003

The Incorporated Owners of Bellevue Court Block A
Bellevue Court
41 Stubbs Road
Hong Kong
(Attn.: Ms. Wendy Lee)

Dear Sir/Madam,

Draft The Peak Area Outline Zoning Plan No. S/H14/6
(Objection No. 3)

Pursuant to section 6(3) of the Town Planning Ordinance (the Ordinance), the Town Planning Board (TPB) gave preliminary consideration to your objection to the above Plan at its meeting on 14.3.2003 and decided not to propose any amendment to the above Plan to meet your objection and the reasons are:-

- (a) the two super-tall developments at 41C and 41D Stubbs Road are incompatible with the pre-dominant medium-density and medium-rise development character of the area. The plot ratio and building height restrictions of the "Residential (Group B)1" zone, which covers the objection sites, are to maintain this existing pre-dominant character of the area, to preserve public views and to protect the ridgeline;
- (b) the plot ratio restriction is to avoid overtaxing the local road system. Increase in the development intensity in the uphill area would adversely affect the traffic situation in the downhill area;
- (c) amendments to the Outline Zoning Plan (OZP) exhibited for public inspection is a form of public consultation. Any affected person can object to the amendments and their objections would be considered by the TPB in accordance with the Town Planning Ordinance;
- (d) development restrictions stipulated in the OZP is to reflect the planning intention of the area. Development right of both objection sites under the respective leases would not be affected by the OZP restrictions; and

3.0 Conclusion

The Town Planning Department and Town Planning Board is requested to refrain from approving Adventist Hospital's height limit relaxation application for reasons below:

- 3.1 The development is excessive in Height, Plot Ratio and Site Coverage, resulting to an excessive building bulk, for reasons outlined in detail in Section 2.1 above.
- 3.2 The traffic generated by the additional car parking in the new development directly contradicts the very reason why height and plot ratio had to be restricted under the 2003 OZP. The carpark numbers are unacceptably too high.
- 3.3 AH's application report has not given due consideration to the development's visual impact and its respect to the character of the neighbourhood, and has no concrete proposal on how to conserve the existing mature trees in the area.
- 3.4 The application has not demonstrated how it would mitigate the potential prolonged nuisance caused by the redevelopment process nor has it outlined how its medical operational and services is affected and organised during the phased construction work.
- 3.5 Adventist Hospital is supposed to be a NGO providing medical service to the community and should not be seen profiteering from it. There are plenty of expensive private hospital capacities on Hong Kong Island. Given the context of the site, there is no sound reason for AH to redevelop to such an excessive manner.

3.6 Referring to the Town Planning Board's previous disapproval letter to Bellevue Court's application dated 28 March 2003 (reference TPB/C/S/H14/6-3), approving AH's application to relax height limit is inequitable to all owners in the near neighbourhood, whose previous developmental potential had to be reduced, height restricted and sacrificed for the common purpose of conserving the 'mid density' and 'mid-rise' character of the neighbourhood, as well as to avoid over-taxing of traffic on the local road network.

If the Town Planning Board is to approve AH's current application to relax their OZP height restriction, it would create an undesirable precedent that destroy the integrity of the original planning intention, and potentially open up to challenge through Judicial Review in the future by owners in the neighbourhood.

For and on behalf of:

THE INCORPORATED OWNERS OF BELLEVUE COURT BLOCK A

Wendy Lee
Authorised Signatory(s)

The Incorporated Owners of Bellevue Court Block A
Wendy Lee

THE INCORPORATED OWNERS OF BELLEVUE COURT BLOCK B

Tony Wong
Authorised Signatory(s)

The Incorporated Owners of Bellevue Court Block B
Tony Wong

THE INCORPORATED OWNERS OF BELLEVUE COURT BLOCK C

Victor Fong
Authorised Signatory(s)

The Incorporated Owners of Bellevue Court Block C
Victor Fong

Date: 8 Feb 2003

- (c) the proposed rezoning would create an undesirable precedent, and the cumulative effect of approving similar rezoning would result in adverse traffic impact and would change the medium-rise, medium-density character of the area.

A copy of the TPB Paper for the preliminary consideration of your objection and the relevant extract of minutes of the TPB meeting held on 14.3.2003 are enclosed herewith for your reference.

Should you wish to withdraw your objection, please inform me in writing as soon as possible, preferably within 2 weeks of the date of this letter.

If your objection is not withdrawn, the TPB will further consider your objection under section 6(6) of the Ordinance. Objections No. 3 to 29 to the above Plan will be heard collectively together. You and/or your authorized representative(s) may attend and, if so desired, be heard at the meeting under section 6(6) of the Ordinance, which is to be held on Friday, 6 June 2003 in the Conference Room, 15th Floor, North Point Government Offices, 333 Java Road, North Point, Hong Kong.

Should you wish to submit any further written representations for the hearing of your objection, you are required to make such submission within 4 weeks of the date of this letter. If the written representations include voluminous technical reports, an Executive Summary of preferably not more than 400 words should be provided.

A copy of the paper prepared by the Planning Department for the hearing of your objection by the TPB will be forwarded to you at the above address 7 days before the meeting. A copy each of the Guidance Notes on section 6(6) hearing and Deferment of Consideration of Objections are also attached for your information.

To facilitate arrangement for the meeting, I should be grateful if you would advise me, within 2 weeks of the date of this letter, of the following: -

- (a) the name(s) of the person(s), if any, that will attend the meeting of the TPB; and
(b) whether you require simultaneous interpretation service at the meeting.

If you wish to seek further clarifications/information on matters relating to the above decision, please feel free to contact Mr. C.S. Chan of Hong Kong District Planning Office at 2231 4935.

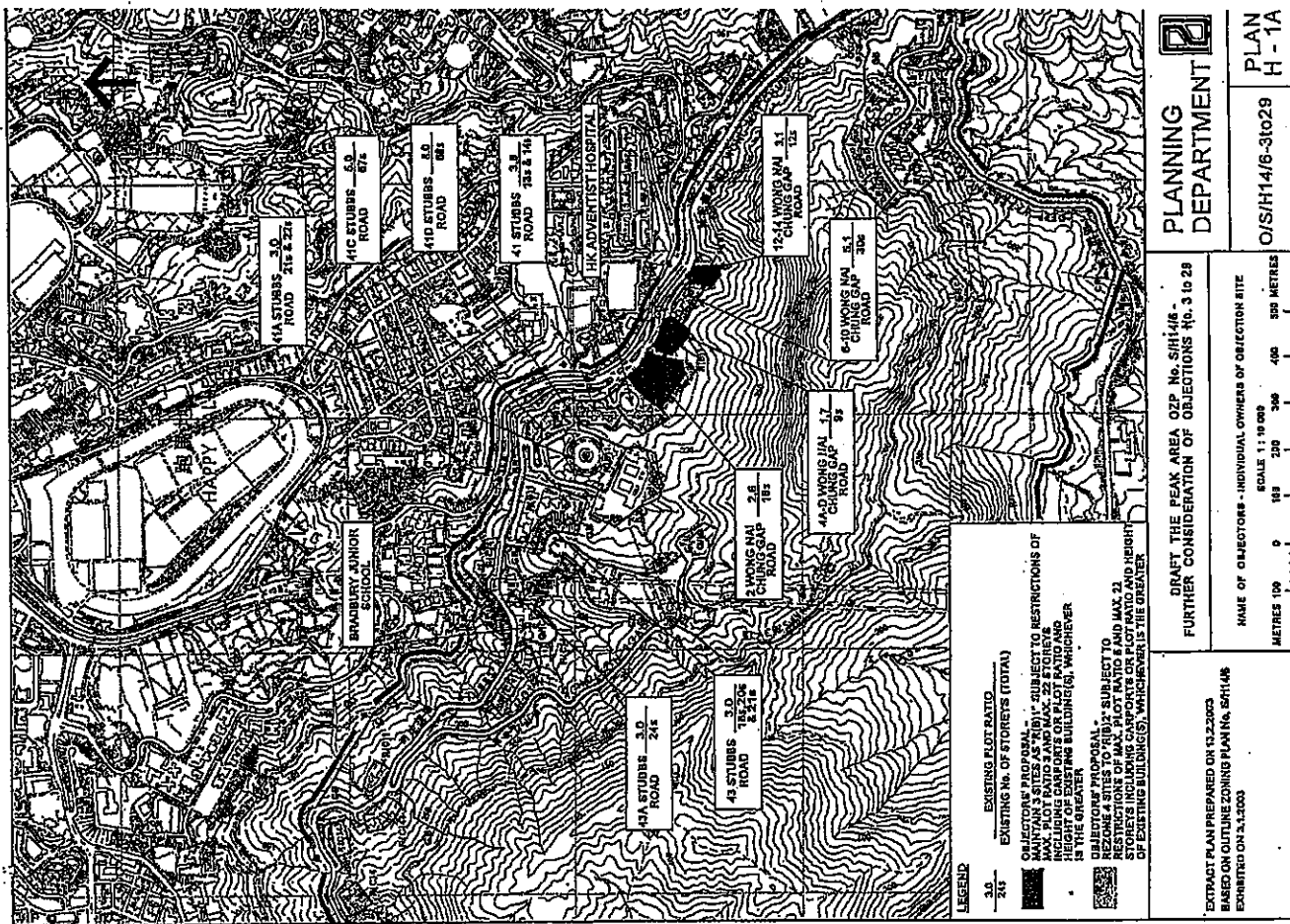
Yours sincerely,



(Mrs. Brenda K. WOK)

for Secretary, Town Planning Board

BK/ALjs



致城市規劃委員會秘書:

專人送遞或郵遞: 香港北角渣甸道 333 號北角政府合署 15 樓

傳真: 2877 0245 或 2522 8426

電郵: tpbpd@pland.gov.hk

To: Secretary, Town Planning Board

By hand or post: 15/F, North Point Government Offices, 333 Java Road, North Point, Hong Kong

By Fax: 2877 0245 or 2522 8426

By e-mail: tpbpd@pland.gov.hk

By fax 10 Feb 2020

~ 8 by hand

5-9

5-9 Bktho

致城市規劃委員會秘書:

專人送遞或郵遞: 香港北角渣甸道 333 號北角政府合署 15 樓

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By e-mail: tpbpd@pland.gov.hk

有關的規劃申請編號 The application no. to which the comment relates

A/H14/82

意見詳情 (如有需要, 請另頁說明)

Details of the Comment (use separate sheet if necessary)

Object To Adventist Hospital's Application to Relax Height Restriction because:
① The Development Height proposed is too high and incompatible with its neighbours (19m higher than World's Hotel and 23m higher than Bellevue Hotel)
② This relaxation of height would make the Hospital building tend to lose the area - 5.59 Plot Ratio & 56.03% site coverage; the development bulk and density is unacceptable as it contradicts the Mid-Rise & Mid-Density planning intention of the OZP. (Average site plot ratio is 2.9 in the area (not counting the unsightly towers); coverage in the area should be 27.5% ~ 30%). The new hospital will simply be too big in size

「提意見人」姓名/名稱 Name of person/company making this comment Fong Wai, Victor (F) of Healdia Int'l Limited

簽署 Signature

日期 Date 7th Feb 2020

③ Car parking provision is too excessive; 164 + 7 loading Bay; it contradicts the planning intention of OZP of limiting excessive development so as the avoid "overtaking" of local roads, especially down slope roads
④ No due consideration shown on preserving mature tree along entry entrance ramp of Adventist Hospital

⑤ Light Tower and large carpark and access ramp block (BKEC) of new development is not compatible in scale with the mid rise, mid-density of the neighbour character, with buildings mostly on terraces secluded by trees and stone wall

⑥ Granting the relaxation of Height Limit of Adventist Hospital Scheme is too in Equitable for its neighbours who have to sacrifice development rights for making the mid-rise, mid-density character of the area under the planning intention

有關的規劃申請編號 The application no. to which the comment relates

A/H14/82

意見詳情 (如有需要, 請另頁說明)

Details of the Comment (use separate sheet if necessary)

Object To Adventist Hospital's Application to Relax Height Restriction because:
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「提意見人」姓名/名稱 Name of person/company making this comment Fong Wai, Victor (F) of Healdia Int'l Limited

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③ Car parking provision is too excessive; 164 + 7 loading Bay; it contradicts the planning intention of OZP of limiting excessive development so as the avoid "overtaking" of local roads, especially down slope roads
④ No due consideration shown on preserving mature tree along entry entrance ramp of Adventist Hospital

⑤ Light Tower and large carpark and access ramp block (BKEC) of new development is not compatible in scale with the mid rise, mid-density of the neighbour character, with buildings mostly on terraces secluded by trees and stone wall

⑥ Granting the relaxation of Height Limit of Adventist Hospital Scheme is too in Equitable for its neighbours who have to sacrifice development rights for making the mid-rise, mid-density character of the area under the planning intention



中倫律師事務所
ZHONG LUN LAW FIRM

5-11

5-10

致城市規劃委員會秘書：
寄人送遞或郵遞：香港北角渣甸道333號北角政府合署15樓
傳真：2877 0245 或 2522 8426
電郵：tbbpd@pland.gov.hk

To: Secretary, Town Planning Board
By hand or post: 15/F, North Point Government Offices, 333 Java Road, North Point, Hong Kong
By Fax: 2877 0245 or 2522 8426
By e-mail: tbbpd@pland.gov.hk

有關的規劃申請編號 The application no. to which the comment relates
AJH14/82

意見詳情 (如有需要，請另頁說明)

Details of the Comment (use separate sheet if necessary)

有關的規劃申請，本署已於一月份接獲申請人，如再增加一
層樓，這是不符合一九八二年的《城市规划條例》的。
對這個申請，本署的意見是，增加樓層是不好的。
工程要十五年才能完成，是不符合一九八二年的《城市规划條例》。
在二零一五年時，這是不符合一九八二年的《城市规划條例》。

「提意見人」姓名/名稱 Name of person/company making this comment 吳一明先生

簽署 Signature S. Ip 日期 Date 2014年2月8日

email: info@zhonglun.com.hk
date: 3rd February 2020

Our Ref: AY/Id
direct line: 2829 2509

Your Ref: TPB/A/H14/82
Please ask for: Ms. Denise Lam

BY FAX (2895 3957) & BY POST
District Planning Officer
Planning Department
North Point Government Offices
333 Java Road, North Point
Hong Kong



78190

Dear Sirs

Re: Proposed Minor Relaxation of Building Height Restriction for Permitted Hospital Use at 40 Stubbs Road, Hong Kong ("Proposed Location") (Application No. A/H14/82) ("Application")

We act for Herolike Limited, the registered owner of Flat 7B, 10th and 11th Floors, Woodland Heights ("Building"), No.2B Wong Nai Chung Gap Road, Hong Kong and refer to your letter to the Incorporated Owners of the Building dated 21st January 2020 inviting public comments on the Application ("Your Letter").

Since the Building is of a close proximity to the Proposed Location, we are instructed to ask the District Planning Officer to take the comments of the owners of the Building into consideration and give a sufficient and reasonable weight to the same when making the decision regarding the Application.

On behalf of our client, we object to the Application on the following grounds:-

1. The proposed redevelopment of Hong Kong Adventist Hospital ("Hospital") will block the views of the Building.
From the information provided in Your Letter, the height of the proposed blocks of the Hospital (Blocks A and B be +208.168 mPD and Block C be +173.568mPD) is taller than the Building (+195mPD). This will essentially block the views of the Building, especially those in the lower levels. The residents of the Building cannot enjoy the views they deserve when they first purchase the respective units of the Building.
2. The redevelopment of the Hospital will lead to serious traffic congestion.

The proposed redevelopment of the Hospital provides an additional 184 vehicles spaces and 7 loading and unloading spaces. It is also foreseeable that there will be more vehicles going in and out of the Hospital. Stubbs Road is a two-way traffic lane with one lane for each direction. There is already heavy traffic affected by the recent developments along Stubbs Road. With an increase of vehicles by reason of the redevelopment of the Hospital, it will

Associate Partners: Alan Yip, JP, Chairperson; Henry C. Li, JP, President; Herbert Chan, President; Gabriel Liang, Vice President; Victor Pao, Deputy President; Louis K. Li, JP, Deputy President; Howard Wong, Deputy President; Jane H. Yeo, Deputy President.
Counsel: Stanley Chan, Daniel Chan, Robert Jones, Kenneth T. Lam, Chief Counsel; Peng Jit Wang, Adam Wong, Jonathan Wong.
Audit and Tax: Kenneth C. F. Chan, The PRA Chan, Mei Choi, Chey S. T. P., Jordan K. T. Mok, Sam S. T. Li, David T. Lam, Chen Liang, Chen W. S. Liang, Samuel Z. Li, Emily Jing, Baskin Mak, Zou S. Y. Tang, Jerald Zu, Benoit Ho.
Regulatory and Compliance: Leung Chun (PAC), Jazzy Lai (PAC), Wayne Wang (PAC), Zou S. Y. Tang (PAC), Mei Zhong (PAC), Xiang Zhang (PAC), Yui Zou (PAC), Mayman Zou (PAC).
Lawyer: Richard Ford.

4/F, Jardine House, 1 Cornhill Place, Central, Hong Kong 電話: 2829 2509 傳真: 2829 2509
Tel: 2829 2509 Fax: 2829 2509 Email: info@zhonglun.com.hk
Website: www.zhonglun.com.hk 中倫律師事務所
China Appointed Auditing Office: 中國會計師事務所



further burden the traffic capacity of Stubbs Road and lead to even more serious traffic congestion.

3. The environmental appearance of the neighborhood in the Proposed Location is changed.

The proposed redevelopment of the Hospital will essentially change the environmental appearance of the neighborhood in the Proposed Location. It will be significantly different from that when the residents moved into the Building. The redevelopment does not embellish the environment in the neighborhood either.

In light of the above, we are instructed to request the District Planning Officer to consider the Application thoroughly and take into account relevant and comprehensive considerations before making the decision.

Yours faithfully

Zhong Lun Law Firm
AY/d



The Incorporated Owners of Villa Monte Rosa
41A, STUBBS ROAD, HONG KONG.
TELEPHONE: 2978 5234, 2972 8835
FAX NO. 2951 9707

5-12

玫瑰新邨
業主立案法團
香港中區干諾道中十一號
二五五五號
二五五五號
二五五五號
二五五五號

2020 FEB 11 P 3:49

PLANNING BOARD

Our Ref: (002) in VMR (cor/cir)2020

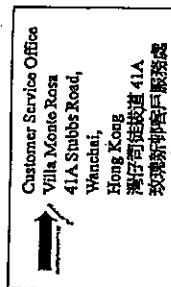
Date: 6th February, 2020

The Secretary of the Town Planning Board
15th Floor, North Point Government Offices,
333 Java Road,
North Point,
Hong Kong

Dear Sirs,

Re: Comments on Planning Application (No. A/H14/82)

Proposed Minor Relaxation of Building Height Restriction for
Permitted Hospital Use at 40 Stubbs Road, Hong Kong



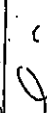
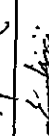
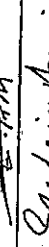
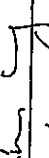
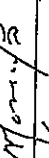
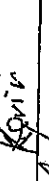
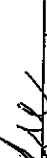
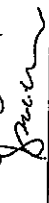
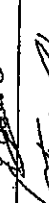
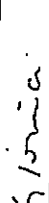
We refer to the planning application (No. A/H14/82) regarding the proposed relaxation of building height restriction for Hong Kong Adventist Hospital at 40 Stubbs Road. On behalf of the residents of the 240 units in Villa Monte Rosa, 41A Stubbs Road (details attached), we strongly object to the application and have the following comments:-

- The capacity of the hospital will be increased by 70% after the redevelopment is fully implemented. This significantly increases the traffic flow of both vehicles and pedestrians. The hospital entrance is adjacent to the roundabout between Stubbs Road and Wong Nai Chung Gap Road. Currently, during rush hours, we already experience congestion. The added traffic will create severe congestion round the clock. No traffic impact assessment study appears to be have been carried out.
- Villa Monte Rosa is close to the hospital and is located on a slope. We are concerned that reconstruction of the hospital will affect slope stabilization, leading to soil erosion and damage to underground pipes and infrastructure. In the absence of a full geotechnical impact study, it is difficult to assess the risks to our property.
- We note that the redevelopment project is expected to be completed in 2035. We are concerned that the noise and air pollution during such a prolonged period will cause pollution and health risks to all residents living in the surrounding area.

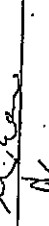
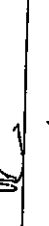
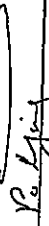
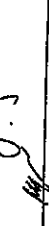
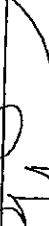
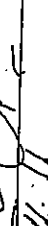
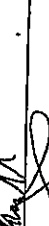
We, the residents of Villa Monte Rosa, object to the Planning Application (No. A/H14/82), Proposed Minor Relaxation of Building Height Restriction for Permitted Hospital Use at 40 Stubbs Road, Hong Kong

[illegible]

We, the residents of Villa Monte Rosa, object to the Planning Application (No. A/H14/82), Proposed Minor Relaxation of Building Height Restriction for Permitted Hospital Use at 40 Stubbs Road, Hong Kong

Name	Signature
ANNE LEE	
SIMON HAN	
CHUNG LAI HAN	
SYLVIA HAN	
CARMEN WONG	
MARK HO	
LAI	
LEE JUN HO JEREMY	
LEE GRACE	
SERVICESMAN	
CHEN MING	
KATRINE SAN	
CHAN HON FUNG	
DEBBIE VAN GELDEREN	
ANNIE CHOI	
VIVIAN HO	
WILLIAM KAN	
GLORIA KAN	
HELEN NG	
CHAN HON CHAN	

We, the residents of Villa Monte Rosa, object to the Planning Application (No. A/H14/82), Proposed Minor Relaxation of Building Height Restriction for Permitted Hospital Use at 40 Stubbs Road, Hong Kong

Name	Signature
MELISSA KINHO	
ANSON CHAN	
KAN T.O.	
WONG WING FAI	
MISS DIANA KING YEN FUNG	
MOK P. YUNG	
RYAN CHAN	
JAMMY JIM	
JESSICA LEE	
ANDREW CHAN	
AMBROSE	
MASON WU	
MEGAN WU	
MORGAN WU	
FRED FONG	
VIVIAN HO	
ISABEL FONG	
OLIVIA FONG	
CLEMENT WONG	
FUNG DENNIS	

We, the residents of Villa Monte Rosa, object to the Planning Application (No. A/H1/482), Proposed Minor Relaxation of Building Height Restriction for Permitted Hospital Use at 40 Stubbs Road, Hong Kong

[illegible]



ROSARYHILL SCHOOL
41-B, STUBBS ROAD
HONG KONG

11 February 2020 ·

**The Secretary of the Town Planning Board
15th Floor, North Point Government Offices
333 Java Road
North Point
Hong Kong**

Dear Sirs,

Re: **Comments on Planning Application (No. A/H 14/82)
Proposed Minor Relaxation of Building Height Restriction for
Permitted Hospital Use at 40 Stubbs Road, Hong Kong**

Through The Incorporated Owners of Villa Monte Rosa we came to know about the project of the HK Adventist Hospital.

We also have the following serious objections to the plan:

1. The traffic congestion will be very much affected: the entrance to the hospital is just at the roundabout, and this will affect very much to vehicles and pedestrians.
2. Within a rather small area there are a large number of schools, at least 6 schools, that require a heavy traffic at certain hours of the day, and that are also already victims of the same heavy traffic. At least three of these schools are international schools relying much on a large number of private cars. Also the number of school buses is large and the slow traffic forces students spend long journeys to come to school and return home after school.
3. Some current school activities carried out by the different schools cause at different times of the year serious traffic congestion that affects neighborhoods like Happy Valley, Tai Hang, even Wanchai and other residential neighborhoods along Stubbs Road, Wong Nai Chung Gap Road, Tai Hang Road, etc.
4. The closeness of our school to the hospital and the location of one of the slopes, that according to a former architect who advised us in the maintenance of the school, is the most risky slope of the several we have around, could also affect very much our building.
5. The length of the redevelopment, more than 15 years, is a serious cause of concern in regards to the noise and air pollution that many affect to our many kindergarten, primary and secondary students.

The news about the redevelopment came to our attention just two days ago, and we did not have time to share with teachers who we are sure will have many other points of objection to the plan. The time to submit our comments is short: the last day is today. Together with some managers of the school we have prepared these comments that we are sure will receive your serious attention.

Yours faithfully,



Fr. Hyacinth He Yousun
Supervisor

We, the residents of Villa Monte Rosa, object to the Planning Application (No. A/H1/482), Proposed Minor Relaxation of Building Height Restriction for Permitted Hospital Use at 40 Stubbs Road, Hong Kong

[illegible]

5-14

致城市規劃委員會秘書：
專人送遞或郵遞：香港北角渣甸道333號北角政府合署15樓
傳真：2877 0245 或 2522 8426
電郵：tpbpd@pland.gov.hk

To: Secretary, Town Planning Board
By hand or post: 15/F, North Point Government Offices, 333 Java Road, North Point, Hong Kong
By Fax: 2877 0245 or 2522 8426
By e-mail: tpbpd@pland.gov.hk

有關的規劃申請編號 The application no. to which the comment relates A/H14/82

意見詳情 (如有需要, 請另頁說明)

Details of the Comment (use separate sheet if necessary)

我們對北角地帶已經有擴建了低層和醫院, 現在不滿意於居民傷射
太大破壞環境, 新地再建, 這是一間新醫院。
② Council blood 若物業又發生像現時 NCP 新地狀, 痛苦 (或說性差)
色軌, 原因居民想遷出北角, 十分接近屋宇, 居民已入去花園, 應
考慮, 令居民想遷出北角, 要如, 中東, 第一層樓層, 居民想遷出北角, 應
小區, 居民想遷出北角, 要如, 中東, 第一層樓層, 居民想遷出北角, 應
③ 居民想遷出北角, 要如, 中東, 第一層樓層, 居民想遷出北角, 應
小區, 居民想遷出北角, 要如, 中東, 第一層樓層, 居民想遷出北角, 應
④ 居民想遷出北角, 要如, 中東, 第一層樓層, 居民想遷出北角, 應
小區, 居民想遷出北角, 要如, 中東, 第一層樓層, 居民想遷出北角, 應

「提意見人」姓名/名稱 Name of person/company making this comment 142 Hkz Law, Spcmt 黎慧
簽署 Signature 黎慧 日期 Date Feb. 11, 2020

在此本人及家人反對該項申請, 深表遺憾。
期盼委員會審慎考慮, 諸君大光。

黎慧 敬上
2020.2.11

就規劃申請/覆核提出意見 Making Comment on Planning Application / Review

參考編號

Reference Number: 200211-114649-40403

提交限期

Deadline for submission: 11/02/2020

提交日期及時間

Date and time of submission: 11/02/2020 11:46:49

有關的規劃申請編號

The application no. to which the comment relates: A/H14/82

「提意見人」姓名/名稱

Name of person making this comment: The Incorporated Owners of Evergreen Villa, Stubbs Road

意見詳情

Details of the Comment:

We refer to the planning application (Application No. A/H14/82) regarding the proposed minor relaxation of building height restriction for the Hong Kong Adventist Hospital at 40 Stubbs Road. On behalf of the residents of 216 units in Evergreen Villa, 43 Stubbs Road, we strongly object to the captioned application with the following reasons:

The hospital lies near the round-about that linking upper and lower Stubbs Road, Tai Hang Road and Wong Nai Chung Gap road, which is a busy junction of the four main routes.

As the number of beds will be increased by 70% after the redevelopment as mentioned in the proposal, the proposed development will generate additional traffic (e.g. ambulance, visitor's car etc.) which may add additional burden to the above four main routes especially during the rush hours.

We would also like to express a question that will the general public's interest be better served if the hospital can expand into another geographic area of Hong Kong so that a wider population base can benefit from the hospital's resources and expertise?

5-16

就規劃申請/覆核後提出意見 Making Comment on Planning Application / Review	
參考編號 Reference Number:	200211-162824-44567
提交限期 Deadline for submission:	11/02/2020
提交日期及時間 Date and time of submission:	11/02/2020 16:28:24
有關的規劃申請編號 The application no. to which the comment relates:	
A/E14/82	
「提意見人」姓名/名稱 Name of person making this comment:	
先生 Mr. WONG WANG T AIIYAN	
意見詳情 Details of the Comment:	
反對此申請	
1. 港安醫院轄下區議會“空窗期”，農曆新年假期前後及香港疫情高峰期間，作出此申請，明顯運用成規規避諮詢制度時間之不足。藉香港港人十分忙於防疫工作之際，未能充分反映此申請意見，本人對此十分遺憾。 2. 就此申請從未諮詢區議會意見，此申請之前亦未和醫院溝通的運作任何溝通，完全沒有誠意維持社區和諧。提出之交通環境評估報告十分粗糙，未能細及灣仔半山近十年交通日見繁忙擁擠之實際問題。 3. 醫院重建之部分設施是不必要地放在申請內，故此提出之不必要空間可令到樓宇之高度不隨申請而增高，高度限制申請放棄是絕對不必要的。 4. 整個重建計劃需時15年，完全不合常理及同類對週邊生活環境之長期影響，實屬非常自私之構思，對週邊居民寧靜生活環境亦置之不理。對病人在建築期內之照顧到今天還未有一套解決方案，未盡醫院應有之基本責任。一意孤行對社區和諧構成十分壞之影響先例，房此申請全面推翻規劃署多年前，對此區實施之高度限制，否定期劃署年前決定。在沒有具體合理情況下，任意再度提高申請。 5. 多年前的構思，港安醫院只是作為小型社區醫院，其地址及面積絕非適合作為大型綜合醫院，現有規模以是超出原意。港安應另覓合適地點作其擴大大計，將此地交回政府以作換地申請。 6. 總結此項申請得不到社區之任何支持，及引起不滿之交接，令社區產生極大之迴響及反對，實屬令人遺憾。作為當區區議員，本人亦難以根據任何合理情況，理由或社區所需而支持此申請。經考慮及平衡各方意見後，本人對此次申請不得不作出反對。	
黃宏泰 灣仔區議員。(可任放道選區)	

5-17

就規劃申請/覆核後提出意見 Making Comment on Planning Application / Review	
參考編號 Reference Number:	200211-173802-40258
提交限期 Deadline for submission:	11/02/2020
提交日期及時間 Date and time of submission:	11/02/2020 17:38:02
有關的規劃申請編號 The application no. to which the comment relates:	
A/E14/82	
「提意見人」姓名/名稱 Name of person making this comment:	
先生 Mr. William Ho	
意見詳情 Details of the Comment:	
- The inquire period for feedbacks and comment is too short as it is held during the Chinese New Year and is under the Novel Coronavirus breakout. Please extend the period. - The construction period is 15 years. It is absolutely unacceptable as it is an extremely long period of time that will affect the neighbouring residents - The purpose of the expansion is unclear - Need additional time to review the required added facilities to determine if they are necessary. - Lack of evaluation on the added traffic load to the neighbourhood.	

5-18

就規劃申請/覆核後提出意見 Making Comment on Planning Application / Review	
參考編號 Reference Number:	200211-175753-20588
提交限期 Deadline for submission:	11/02/2020
提交日期及時間 Date and time of submission:	11/02/2020 17:57:53
有關的規劃申請編號 The application no. to which the comment relates:	
A/H14/82	
「提意見人」姓名/名稱 Name of person making this comment:	
女士 Ms. Christina Hui	
意見詳情 Details of the Comment:	
- Need to extend review period to understand the details of the construction. - 15 year of construction period is ridiculous. Need to understand why it will take so long and if there are ways to shorten the period. - Need to understand the rationale of expanding the hospital. A new private hospital, Glenn Eagle Hospital, has been built recently within 5 mins of drive. Why do we need additional capacity in the neighbourhood? - The expansion scope is too large and broad. Need the applicant to provide further details on the additional facilities and services. - The proximity to the neighbouring buildings - with the recent virus outbreaks, we are concerned about the safety of the neighbourhood. What are the hospital's plans and government's contingency plans for reacting to community virus outbreaks?	

5-19

就規劃申請/覆核後提出意見 Making Comment on Planning Application / Review	
參考編號 Reference Number:	200211-204530-35935
提交限期 Deadline for submission:	11/02/2020
提交日期及時間 Date and time of submission:	11/02/2020 20:45:30
有關的規劃申請編號 The application no. to which the comment relates:	
A/H14/82	
「提意見人」姓名/名稱 Name of person making this comment:	
先生 Mr. Kwong Aaron	
意見詳情 Details of the Comment:	
Personally I have no objection in redeveloping the hospital. However I cannot agree with the request of lifting the height restrictions. The area is not a high density area, with traffic already bad as it is currently. I strongly doubt the network of roads will be able to cope with the increased traffic. Stubbs road had always been a pain for residence in the area, plagued with frequent traffic jams. With a proposed development there will be more strain to the network and will make Happy Valley traffic a lot worse also. Also the plans for redevelopment is 15 years. Fifteen years of work will cause a lot of disturbance to the nearby neighbours.	

tpbpd@pland.gov.hk

5-20

寄件者:
寄件日期:
收件者:
副本:
主旨:
附件:

2020年02月10日 星期一 11:08

tpbpd@pland.gov.hk

Leland Sun, [REDACTED]; Mrs Sylvia Lau; Lai Hoi Ngan; Mr. Eric Mak
Objection to Application A/H14/82
Submission package to TP8 20200210.pdf

Dear Sirs,

Please find attached the Objection for the the captioned Application by Hong Kong Adventist Hospital.

The same attachment has also been faxed to your office.

Regards,

David Au

致城市規劃委員會秘書:

專人送達或郵遞: 香港北角海邊道333號北角政府合署15樓

傳真: 2877 0245 或 2522 8426

電郵: tpbpd@pland.gov.hk

To: Secretary, Town Planning Board

By hand or post: 15/F, North Point Government Offices, 333 Java Road, North Point, Hong Kong

By Fax: 2877 0245 or 2522 8426

By e-mail: tpbpd@pland.gov.hk

有關的規劃申請編號 The application no. to which the comment relates A/H14/82

意見詳情 (如有需要, 請另頁說明)

Details of the Comment (use separate sheet if necessary)

Please see attached (3 pages)

「提意見人」姓名/名稱 Name of person/company making this comment DAVID AU

簽署 Signature

日期 Date

10/2/2020

Application No. A/H14/82

Location: 40 Stubbs Road, Hong Kong

Proposed Minor Relaxation of Building Height Restriction for Permitted Hospital Use

I am submitting herewith objection to the captioned application. The reasons are as follows:

1. Contrary to Planning Intention of this Peak Area and with excessive plot ratio
Referring to the notes as attached in S/H1 4/13-The Peak Area Outline Zoning Plan (OZP) gazetted under Section 9 (1)(a) on 06/06/2018 where the subject site in this application is, which says:

This zone is intended primarily for medium-density residential developments where commercial uses serving the residential neighbourhood may be permitted on application to the Town Planning Board.

And on Remarks, it says:

On land designated "Residential (Group B)1", no new development, or addition, alteration and/or modification to or redevelopment of an existing building shall result in a total development and/or redevelopment in excess of a maximum plot ratio of 3 and a maximum building height of 22 storeys including carports, or the plot ratio and height of the existing building, whichever is the greater.

On land designated "Residential (Group B)2", no new development, or addition, alteration and/or modification to or redevelopment of an existing building shall result in a total development and/or redevelopment in excess of a maximum plot ratio of 2.1 and a maximum building height of 12 storeys over 1 storey of carports, or the plot ratio and height of the existing building, whichever is the greater.

It is clear that the planning intention for the whole area is of medium-density developments. Sites for Commercial uses and logically Government, Institution or Community (GIC) use are to serve the neighbourhood. It is expected that medium-density developments should also apply to the subject GIC site (Hong Kong Adventist Hospital) (HKAH) which abuts lots all with R(B)1 zoning parameter along Stubbs Road on its east and west. The clusters of development in this zone shall be harmonious and of similar building bulk following the approved planning parameter and intention.

Photomontage from Viewpoint C clearly demonstrates the incompatibility of the massive and imposing institutional cluster (and an odd elevator tower on Stubbs Road frontage) with the adjacent residential buildings.

We have seen irreversible cases of totally incompatible and eye-sored development of Highcliff and The Summit close by and those were the reasons where plot ratios and building heights are subsequently incorporated in OZP to protect the planning intention for future development in the area.

HKAH is proposing a plot ratio of 5.59 which far exceeds the R(B)1 limit of 3. It will be unethical and legally challenged if GIC site is allowed to exceed what its neighbouring lots are limited to on development potential.

The proposed scheme is totally unacceptable with regard to original planning intention of this Peak zone, on urban design, as well as density.

2. Excessive Car parking provisions

The proposal intends to provide 175 private car parking spaces on top of loading/unloading, taxi spaces and alike. This is a size bigger than the existing City Hall car park with a capacity of 170 spaces serving the whole Central community.

Under Hong Kong Planning Standard Guideline (HKPSG), for hospitals, the car parking provision is 1 space per 3 to 12 beds.

For 231 beds as HKAH proposed, even the high-end ratio calculation will only yield: 231/3 or equals 77.

If low end ratio is used, the car park space will only be 231/12 or equals 20.

Car park is not in Column 1 of Planning notes and subject to Planning approval. Excessive car park is also subject to GFA calculations, and this may further increase the current proposed plot ratio of 5.59.

The intention is clearly commercial rather than serving as ancillary to the hospital.

3. Traffic Impact Study (TIA)

The report is missing in the bundle provided to our Estate (Villa Monte Rosa).

HKAH is located at a very sensitive junction serving the Peak as well as Island south from all directions of traffic on Hong Kong Island. The hospital can only be accessed from Stubbs Road through a single lane two-way junction just a few meters away from the all so important Wong Nei Chung roundabout. This

tpbpd@pland.gov.hk

S-21

寄件者: 2020年02月10日星期一 3:43
收件者: tpbpd
主题: AH14/A2 Adventist Hospital Stubbs Road
附件: Hospital Beds HK.pdf

AH14/A2

Adventist Hospital, 40 Stubbs Road, Hong Kong

Site area: About 7,933.8sq.m

Zoning: "G1C"

Applied development: Minor Relaxation of Building Height Restriction for Permitted Hospital Use (70% increase in possible occupancy)

4 Blocks / 16-15-10-3 floors / PR 5.59 / SC 58.03% / 231 Beds / 65 Rooms / 191 Vehicle Parking

Dear TPB Members,

At a time when Hong Kong people are very concerned about contamination, this private hospital, already uncomfortably close to many hundreds of residential units, is proposing to extend its premises to cover almost the entire site. The site coverage quoted is misleading as the building will be extended incrementally in line with the hillside behind.

There will be wards in very close proximity to the adjoining towers on both sides. There is also a school close by.

Block A and Block B would be built further back and it is clear that cross ventilation would not be possible.

Well designed open space to be enjoyed by the public? Ridiculous as nobody would choose to hang out close to a hospital. Moreover the site is next to one of the most well known trails, Bowen Road.

The facility would attract more traffic on an already saturated junction.

It is quite clear that hospitals should be located in well ventilated areas, preferably some distance from residences. Moreover there is no need for additional private hospital facilities on HK Island as is clear from the attached data.

Additional beds are to cater not for local but for medical tourism. They should be located close to the airport, HKMZ Bridge or border crossings. Why have sick people, sometimes with contagious conditions, transported long distance through the territory posing health risks?

Contagion is now a major issue, it should be minimized. With all the hoo-haa about integration with the Greater Bay Area, it is quite clear those additional facilities that are not required for the local population should be sited close to the border.

roundabout and in addition the HKAH junction have been notorious on normal days, and worse on school days with Rosary Hill school traffic along Stubbs Road.

With the amount of increased beds and car parking proposed, huge additional traffic is expected and any simple hiccup in the hospital area will jeopardize the traffic in an extended area. The right turn downhill traffic from the hospital is also very critical and must be resolved, or even new viaducts connecting to lower Stubbs Road or Blue Pool Road will need to be provided.

The proposed increase in scale of hospital operation will also impose heavy load on staff and visiting traffic and consequently on the lone GMB No.26 and Bus No.15. Any increase in schedule or additional routes will impose further load on the already tight single lane two-way Stubbs Road and Queen's Road East junction, and there is absolutely no room for any widening downhill.

Traffic is the utmost critical issue to be addressed for any increase of development.

4. Unjustified Minor Relaxation of Building Height

There is absolutely no justification for relaxation if the proposal follows original planning intention of this Peak zone. There is also the long-term effect of setting a precedence case which Planning Department should continue to hold firmly against.

5. Length of Construction

The proposed phasing construction covering up to 2035 is unacceptable. A construction project of over 15 years is unfair and unbearable for a nice and quiet neighbourhood, not to mention the environmental and traffic issues brought along.

Prepared by:

David Au

9th February, 2020

Have local residents been consulted on this plan? I have not read anything in the media.

This development is all about making money with no consideration for the impact on the local populace.

Members hopefully will take on board the issues that have surfaced during the current health crisis and reject this application as inappropriate for the location.

Mary Mulvihill

Analysis of location of hospital beds
Population distribution by area

[illegible]

Information on public hospitals taken from HA Annual Report 2017-2018
http://www.ha.org.hk/hn/corpcomm/AR201718/PDF/HA_Annual_Report_2017-2018.pdf
 Information on private hospitals taken from HA Annual Report 2016-2017 and updated from websites

Private Hospitals	Kowloon	
HK Island	Baptist	860
Adventist	Caritas	175
Canossa	Evangel	60
Gleneagles	St Teresa	1,050
HK Sanatorium		480
Matilda	NT E&W	100
St Paul's	TW Adventist	350
HKSH SKW 20	Union	100
	CUHK (2020)	1,840
		600
		1,480

[illegible]

tpbpd@pland.gov.hk

5-22

2020年02月09日 星期日 15:15
收件人: tpbpd@pland.gov.hk
寄件人: Victor Fong, Wendy Song
主题: Application AH14/82

Dear Sir,

Regarding the above application and the assertion that there would be "no adverse impact on traffic, visual landscape, environmental and geotechnical point of view" on the neighbourhood is wishful thinking at best.

How could there not be an impact? 1) on traffic—with an additional 184 parking spaces, 7 loading bays, extra ambulance bays etc. Already the traffic at certain times of the day is horrendous and with this additional capacity traffic will only worsen

2) visual landscape- viewing the proposed additional building- a massive concrete block fronting Stubbs Road which would be totally out of character for this mid-rise residential neighbourhood. We currently have a lot of mature trees and greenery which provide a respite from the traffic and noise pollution and this does not seem to be taken into consideration

3) environmental impact- more noise pollution, more dust pollution, more air pollution from cars and buses. The proposed building at the back will block much needed sunlight and air circulation.

The proposed relaxation of zoning criteria will change forever the nature of this area and not for the better and it seems to be contrary to the original planning and vision for this area of Stubbs Road. We already have three large private hospitals within a few miles of each other and the newest is not running at capacity.

I earnestly ask the planning department to consider the concerns of not only the residents of this area but all those who come to enjoy the wonderful Bowen path area.

Yours truly,
Helen Agon
Bellevue Court

Sent from my iPad

Projected Population by District Council District, 2018-2026		2016	2017	2018	2019	2020	2021	2022	2023	2024	2025	2026
District Council District		243300	244600	246700	241000	237900	234500	228800	224200	219700	218000	213800
Central and Western		180100	181400	183100	178000	173800	173800	168200	165100	161600	159000	154800
Wan Chai		180100	181400	183100	178000	173800	173800	168200	165100	161600	159000	154800
Southern		275000	275000	277300	269500	268200	268200	263300	270200	274800	275500	276800
Hong Kong Island		1253400	1248500	1239000	1239500	1235500	1235500	1197000	1189200	1182200	1172700	1160500
Sham Shui Po		405900	406900	403400	472200	447600	458900	460300	460900	467800	467500	467600
Kowloon City		418700	417800	419700	423900	429200	428200	431700	433300	437000	439000	443500
Wong Tai Sin		425200	424800	424500	422300	427500	430100	430600	431000	435300	439000	443500
Kwun Tong		648500	669400	685300	694000	699300	702000	704000	711600	715800	718300	721200
Yau Tsim Mong		343000	337200	334500	328400	326500	323400	316900	309800	307300	302900	295400
Kowloon		2241300	2256100	2267300	2302200	2330500	2342600	2343400	2352500	2384800	2391000	2381600
Kwai Tsing		520600	515600	513800	513800	513800	513000	512000	520300	522300	522700	520400
Tsuen Wan		318900	317100	313400	313300	315900	315200	309900	308000	307100	303800	304800
Tuen Mun		489300	488400	503500	506200	514400	536400	540900	550900	570100	571700	571700
Yuen Long		614200	630200	640000	649000	649500	654000	658300	660800	673400	700400	704800
North		315300	316800	318100	317400	324600	325600	357600	364100	372900	374300	405800
Tai Po		303900	306500	307300	311200	323900	329600	346700	349800	350400	351000	351000
Sha Tin		659800	682100	683700	693000	704800	716600	718200	714100	712500	708600	708600
Sai Kung		461900	466500	471500	474200	479500	492400	500200	508700	511000	519500	525900
Islands		156800	162900	173800	188600	187800	188900	196000	194900	193800	193500	193400
New Territories		3840600	3885000	3929000	3962800	3997000	4043900	4116200	4162700	4229900	4282200	4282200
New Towns		3438200	3464200	3492600	3515000	3547800	3593400	3635100	3673400	3698600	3694600	3694600
Other Areas		402400	421800	436400	447800	449200	450400	481100	489200	496000	525400	587500
Land Total		7335400	7390600	7449300	7501400	7557000	7607300	7656800	7704400	7747400	7787700	7824200
Plus : Marine Population		1200	1200	1200	1200	1200	1200	1200	1200	1200	1200	1000
Whole Territory		7336600	7391700	7450500	7502600	7558100	7608400	7657700	7705400	7748400	7788700	7825200

https://www.pland.gov.hk/pland_en/info_serv/statistic/wgpdt18.html

5-23

就規劃申請/覆核後提出意見 Making Comment on Planning Application / Review	
參考編號 Reference Number:	200210-192254-99750
提交限期 Deadline for submission:	11/02/2020
提交日期及時間 Date and time of submission:	10/02/2020 19:22:54
有關的規劃申請編號 The application no. to which the comment relates:	A/H14/82
「提意見人」姓名/名稱 Name of person making this comment:	先生 Mr. Wang Tai Wong
意見詳情 Details of the Comment:	100% Objection to this application
1. Totally Bypass district council discussion and consultation. 2. fail to consult her neighbour buildings properly 3. lack of relevant documents for discussion, especially they create a biased traffic evaluation report. 4. completely overwrite and ignore the decision done by planning department previously. 5. some facilities is not necessary included into existing plan, so higher floors and height release is unnecessary. 6. 15 years construction period by phases is unreasonable and too long. 7. It is the most selfish and unrealistic application i ever seen before. 8. This application simply take advantages of suspense period of district council meeting, chines e new period holiday and critical period of "Virus War" in Hong Kong. Most of peoples do not have enough time to prepare objections in details. It is a shame application in regard to Hospital with religious background. W.T. Wong	
Conclusion	

5-24

就規劃申請/覆核後提出意見 Making Comment on Planning Application / Review	
參考編號 Reference Number:	200210-223436-48051
提交限期 Deadline for submission:	11/02/2020
提交日期及時間 Date and time of submission:	10/02/2020 22:34:36
有關的規劃申請編號 The application no. to which the comment relates:	A/H14/82
「提意見人」姓名/名稱 Name of person making this comment:	小姐 Miss Connie Wh
意見詳情 Details of the Comment:	Objection to the expansion. It'll create much noise and traffic for the area.

S-25

就規劃申請/覆核後提出意見 Making Comment on Planning Application / Review	
參考編號 Reference Number:	200211-011216-09571
提交限期 Deadline for submission:	11/02/2020
提交日期及時間 Date and time of submission:	11/02/2020 01:12:16
有關的規劃申請編號 The application no. to which the comment relates:	
A/H14/82	
「提意見人」姓名/名稱 Name of person making this comment:	
Dr Marcel Soe Fa Lie KEN JIE	
意見詳情 Details of the Comment:	
Dear Town Planning Board, I refer to your statutory notice dated 21 January 2020, with regard to the proposed building height relaxation of the Adventist Hospital. On behalf of my family, residents at Block C of Bellevue Court (41 Stubbs Road), at close proximity to the subject site, we are writing to raise a strong objection to this application. Reasons as follow: 1. According to the Explanatory Statement of THE APPROVED THE PEAK AREA OUTLINE ZONING PLAN NO. S/H14/13 (HONG KONG PLANNING AREA NO. 14) dated April 2018, the fundamental objective of the planning policy was clearly detailed at page 4 of the statement, paragraph 7.1 to 7.3. And we quote: "The intention is to ensure that the scale and intensity of the developments on these sites would be compatible with that of the surrounding developments in order to maintain the existing low-rise character of the Area." This concept was further re-iterated by the statement saying: "In order to prevent excessively tall or out-of-context buildings, to preserve some key urban design attributes for the Area and to provide better control on building height profile of the Area, appropriate building height restrictions are imposed on various development zones on the Plan." We would also take this opportunity to remind the Board that paragraph 8.4.6 has clearly defined the anticipated building mass, density and visual impact of the site of Adventist Hospital as follows: "Situated on an elevated platform of about 144mPD, the existing development within the Hong Kong Adventist Hospital at Stubbs Road consists of two buildings, i.e. the 10-storey Main Block of about 166mPD and the 15-storey La Rue Building of about 188mPD. To maintain the existin	

g medium-rise character of the local setting and preserve the visual access to the natural mountain backdrop, the site is restricted to a maximum building height of 165mPD and 190mPD for its northern and southern portions respectively." The application's request for an increase of building heights is unacceptably extensive: • North-eastern portion of site: 165 mPD to 173.568 mPD (5.2% higher) • South-western portion of site: 190 mPD to 208.168 mPD (9.562% higher) These degrees of building height change are certainly NOT minor With the development being hospital buildings, large amount of MEP equipment is expected at the roof. With essential plant rooms being exempted building components, these items at the roof may not be counted as building height, and therefore the newly proposed levels of mPD are not really the real physical and visual impact to the surrounding environment. It will be even more extensive, and more unacceptable. 2. Another disturbing aspect of this proposal is the excessively high density of the redevelopment. Being an immediate neighbouring site, we have grave concerns on the potential lack of ventilation, and therefore spread of diseases and virus, car fumes amongst the neighbourhood under such disproportionately dense building mass. 3. The significant increase of traffic caused by this redevelopment will also cause detrimental impact to the local traffic. A roundabout nearby, which is a main connector to many other parts of Hong Kong, is already suffering from some very congested traffic on some days of the week. Added to this the proposed 184 extra parking spaces at the hospital will cause further negative impact on traffic in the area. 4. In addition to the problems above, the proposal has also included a lift tower, which is a highly insensitive design, visually dominant detached in front of a bulky carpark/ ramp building fronting Stubbs Road. The lift tower in itself is equivalent to an 11-storey residential building. Under such circumstances, we must strongly oppose to this application. This is a proposal that a buses development potentials by ignoring or causing substantial negative impact to its surrounding neighbourhood, degrading the quality of space and also the area's enjoyment to space, ventilation, views and traffic circulations. We hope our Town Planning Board would uphold clearly the existing planning policy and disapprove this very much an excessive, out-of-context proposal that violates Hong Kong's urban attributes, and the existing character of the local setting with views to the mountains as backdrop. Yours faithfully, Dr Marcel Soe Fa Lie Ken Jie
--

致城市規劃委員會秘書

專人送遞或郵遞：香港北角渣甸道333號北角政府合署15樓

傳真：2877 0245 或 2522 8426

電郵：tpbpd@pland.gov.hk

To : Secretary, Town Planning Board

By hand or post : 15/F, North Point Government Offices, 333 Java Road, North Point, Hong Kong

By Fax : 2877 0245 or 2522 8426

By e-mail : tpbpd@pland.gov.hk

3

有關的規劃申請編號 The application no. to which the comment relates

A/H14/82

意見詳情 (如有需要, 請另頁說明)

Details of the Comment (use separate sheet if necessary)

Objection to the Application No. A/H14/82

「提意見人」姓名/名稱 Name of person/company making this comment Della Lo

簽署 Signature [Signature] 日期 Date 11.02.2020

00753 P. 2

5-26

RECEIVED

2020 FEB 11 P 4:51

TOWN PLANNING BOARD

Incorporated Owners of Woodland Heights
2 Wong Nai Chung Gap Road, Hong Kong

The Secretary of Town Planning Board
c/o Planning Department
North Point Government Offices
333 Java Road, North Point
Hong Kong

11 February 2020

Dear Sirs,

Planning Application of Redevelopment of Adventist Hospital at 40 Stubbs Road
Public Enquiry from Planning Department Regarding Building Height Relaxation
(Planning Application A/H14/82)

Comments and Objections from Woodland Heights, 2 Wong Nai Chung Gap Road

Thank you for your recent circular regarding the captioned redevelopment proposal. Our building complex is situated adjacent to the Adventist Hospital.

After surveying our 20 owners and residents, we wish to register our strong objections to the hospital redevelopment application (hereinafter called "the Application"). These concerns are unanimously supported by the owners and residents who have been surveyed.

Document Reference

We reviewed and make reference to the following documents pertinent to the Application:

- Plans and Sections of the proposed redevelopment, photomontage and landscape plan
- Planning Statement (Knight Frank Report)
- Environmental Assessment (EA), Traffic Impact Assessment (TIA), Visual Impact Assessment, Tree Survey, Geotechnical Review (GR) from various technical consultants.

Summary of Concerns and Objections

We have eight categories of concerns and objections, namely:

1. Traffic Congestion
2. Noise Impact
3. Safety Impact
4. Light and Air Quality
5. Negative Visual Impact
6. Health Impact
7. Excessively Long Development Period
8. Mature Trees Preservation

5-27

By hand or By Fax

Overall, the Application is materially inconsistent with the planning intentions of the Outline Zoning Proposal ("OZP") for the Stubbs Road area in question, as documented in the Town Planning Board ("TPB") meeting of 14 March 2003 and in subsequent hearings. The intentions of the OZP were to avoid adverse traffic congestion, preserve the mid-rise and mid-density character of the neighborhood, and protect against negative visual impact. We believe approving the Application would contravene these intentions and set an unwarranted precedent. It would also risk subjecting the Application, if approved by TPB, to judicial review and other remedies aimed at making this proposal more reasonable to the neighborhood and in line with the public interest.

Traffic Congestion

Lower Stubbs Road traffic to Wanchai is frequently busy and the road is often congested to the junction at the roundabout of upper Stubbs Road, Tai Hang Road and Wong Nai Chung Gap Road ("the Junction"). This is especially the case during mornings/evenings and in mid-afternoons when schools end their day. In our catchment area are located the following schools: Rosary Hill, Bradbury, Marymount and French International. Not far away are Wai Yan College, South Island School and St Paul's Co-Educational College Primary School.

The Traffic Impact Assessment (TIA) from the Application appears to make light of this reality. We strongly object to the conclusions as presented and query the validity of the study. Specially, we question:

- the particular date the Traffic Survey was conducted;
- potential flaws in the raw data and collection methodology;
- not taking into account different scenarios and time periods of traffic flow.

We understand that a manual car-count survey was performed on one weekday in January 2019 (paragraph #2.3 of TIA). This is a seriously flawed methodology because a day in January was around the festive seasons of Christmas, New Year and CNY, where traffic would be unusually light as schools were on holidays, people went on vacation and patients might not choose to be hospitalized during holiday periods. Taking a survey during this period would lead to a highly misleading indication of general traffic conditions, and should not form a justified basis for concluding that there would be little or no adverse traffic and congestion impact from the Application.

The survey reports that its observers took actual car counts at the Junction. Based on this, the projected impact on traffic conditions from the new redevelopment was deduced. The capacity assumption referred to was 135 beds (Table 2 to #2.1.3) and the conclusion was that traffic conditions would be 83% saturated (Table 15 to #5.3.1). However, the number of beds was 120 based on web information (<https://zh.wikipedia.org/wiki/香港養安醫院> - 司徒拔道) and had this figure been the basis, the saturation would have been higher, i.e. more busy. We commented that 83% saturation is already very busy at the Junction and given that there is no other alternate route for Woodland Heights residents, we would be extremely concerned about adverse traffic and congestion impact.

We also understand that operations of Adventist Hospital would be running in parallel with the construction work until its completion in year 2035 (# 4.1 of the Planning Statement), an extremely long

and protracted span of 15 years. The nature of traffic is a major concern, given the need for lorries, heavy equipment and other industrial vehicles. In addition, there will be hundreds of workers commuting to and from the site, aggravating traffic congestion and straining public transportation. The situation will be worsened when roads around are blocked to facilitate ancillary work such as laying pipes and cables. All these factors will have significant negative impact on traffic, and we are surprised that the TIA did not address these impacts. There is also the related issue of public safety and security given the construction work and workers in the area.

We believe a more thorough, objective and realistic traffic impact study should be conducted to supplement the Application using credible methodologies.

Noise Impact

The proposed new hospital block (Block B) is in a similar position as the current La Rue Building and there will be a continuous row of pipe pile wall abutting the site boundary. This row of piles sinks 30m into the ground (Schematic plan LG1F to Geotechnical Review from David SK Au Associates Ltd) and the construction of these piles and subsequent erection of the tower will inevitably emit high levels of noise.

Woodland Heights is the identified Noise Sensitive Receiver and our Block A/B is located 7m from the new block (Table 3.1 to Environmental Assessment Report). The report merely suggests that a safeguard will be the contractor's good practice in the choice of plant and noise muffler/barrier, but it fails to offer a credible solution to prolonged and potentially significant noise pollution, especially to our Block A/B residents.

We urge the new block to be located as far as practicable from Woodland Heights instead of abutting our boundary. In addition, work crews should be required to work inside an enclosure to abate excessive noise nuisance. Noise enclosures can reduce noise levels by 15dB(A) (paragraph 3.4.2 of the report). This should be a requirement for work at this close vicinity and it should be explicitly committed to by Adventist Hospital if the Application is to proceed.

Safety Impact

The hospital aims to expand its building bulk - it goes above ground and underground to build higher and deeper respectively. When it builds underground, it disturbs the soil and ground water. Woodland Heights faces hillside slope exposure at its rear, and some grounds, e.g. driveway, pedestrian walkway, our communal lawn at the front, are supported only by compact soil. When Adventist Hospital starts to excavate, the ground water will drain away and our grounds will re-settle and crack.

Woodland Heights and Adventist Hospital were built on the same platform sharing the same hillside, demarcation on boundary was made on paper for ownership and liability purposes only. When there are heavy works at Adventist, the load path of soil stability will shift, and Woodland Heights will be heavily affected. At the same token, this puts pressure on slope stabilization for which we are responsible and have, over the years, undertaken to maintain at significant cost. The integrity of these works would be at

risk. We do not feel it is fair to shoulder this additional risk without Adventist Hospital sharing the financial burden of safety maintenance.

In the Application, there should be an assessment of the geotechnical impact to neighbors around the site, subject to review and comments by our consultants.

Light and Air Quality

The Environmental Assessment report identified the emitted pollution from the hospital during construction and operation and ways to mitigate it. However, it fell short of explaining how light and air circulation would be after the erection of the new blocks.

New Blocks B & C would take up the approximate location of the current La Rue Building and the hospital block, but they will be higher and bulkier. Because of the height, the air movement and natural light affecting Woodland Heights will change.

Woodland Heights Blocks A and B are only 15m (or less) from Adventist Hospital and our residents will be negatively impacted. Please provide us with an environment assessment of the air flow and light impact arising from the new massing of new blocks.

Negative Visual Impact

Woodland Heights shares a stone retaining wall at the Junction with Adventist Hospital. There was no indication in the Application how this joint wall would be dealt with both structurally and in terms of visual impact.

The Application calls for relaxing the building height and the plan Fig V3.3 refers existing hospital block is +172mPD whereas the current height limit from Planning Department is +165mPD. It would have a different perspective in terms of sightline from Woodland Heights. Please clarify for our consideration.

Woodland Heights is subject to OZP height restrictions. The Application proposes a new height of +212.98m PD, which is 17.918m higher than Woodland Heights, or the equivalent of c.5.5 domestic storeys. We believe this is excessive and should NOT be approved.

A related point is we do not understand what justification there would be for granting Adventist Hospital a Plot Ratio of 5.59 when the majority of neighboring buildings have Plot Ratios ranging from 1.7 to 3.8. Woodland Heights Plot Ratio is only 2.6.

The Visual Impact Assessment should be more comprehensive to factor Woodland Heights into consideration.

Health Impact

While a hospital brings convenience to us, at the same time an enlarged patient capacity brings potential hazards of germs and disease to us and this district. We trust Adventist Hospital will take necessary

safeguards to control and contain disease spreading, and would like to hear further from them their mission statement and commitment to Woodland Heights on the hygiene issue, including that of emitted gas/air/fluid/chemical and medical waste.

We are also extremely concerned about dust, particulate and toxic construction waste pollution especially given the protracted construction period (up to 15 years, as proposed in the Application).

The vast majority of our owners' and residents are elderly, suffering from respiratory ailments and with weakened resistance. Hygiene, noise and air pollution are therefore of particular concern especially to the elderly who spend most of their days at home.

Excessively Long Development Period

We register our deep concern about the 15 year proposed development period. This raises, inter alia, questions about the financial viability of the project. We also question the need for expanded capacity at Adventist Hospital. Our neighborhood is already well served by Adventist, the newly opened Genealoges Hospital (5 mins away by car and apparently underutilized in most facilities), St Paul's Hospital (a new wing has 400 beds), HK Sanatorium & Hospital, and Ruttonjee. Mathilda, Canossa and Tung Wah Eastern Hospitals are less than 15 mins away. We question what public interest (as opposed to private profit) is being served by adding significant capacity to Adventist Hospital?

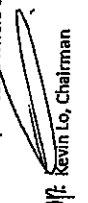
Mature Trees Preservation

It is unclear from the plans to see what measures are in the AH Proposal to preserve the mature trees on the site. Given the severe loss of mature trees and vegetation, as well as increased soil erosion risk caused by Typhoon Mangkhut in 2018, we are very concerned about any degradation or removal of trees and shrubbery at Adventist. We request further clarification of this issue.

The above are our views collected so far and may not be exhaustive. Please put these concerns and objections on record, and we would appreciate your response. Should you have any queries, please do not hesitate to contact us.

Yours faithfully,

For and on behalf of
Incorporated Owners of Woodland Heights (Wong Nai Chung Gap Road)


Kevin Lo, Chairman

Douglas Van, Vice Chairman

Carl Lu, Secretary

Cc: Mr Ivan Wong, Councilor, Wan Chai District Council

tpbpd@pland.gov.hk

6-28

寄件人: Paul Tao - CLG <ptao@chonglgroup.com>
发件日期: 2020年02月10日 星期四 - 16:00
收件人: tpbpd@pland.gov.hk
主题: (Application No. A/H14/82) Proposed Minor Relaxation of Building Height Restriction for Permitted Hospital Use - 40 Stubbs Road, Hong Kong

To: Secretary, Town Planning Board

The application no. to which the comment relates: A/H14/82

Details of the comment:

We wish to express our strong objection to the above Planning Application (A/H14/82) with the following reasons/comments:

1. Huge disruption caused by an unreasonably long construction programme.
 - The 3 phase long project programme which will stretch out to 15 years is totally unacceptable to its neighbours. It will cause severe traffic congestion at the Stubbs Road roundabout during construction and also afterwards. The traffic is already bad during rush hours with the current hospital and an unusual road configuration is already in place to prevent the dangers of turning right into the hospital from Stubbs Road. It will only get much worse with the new, more dense project.
 - Block C of Bellevue Court especially, but also Block B and A are in very close proximity to the hospital site. The noise and disturbance of the construction will be intolerable because of the proximity, and also the amplification caused by the high slope retaining wall at the back of Bellevue Court.
 - the dust, dirt and debris during demolition and construction will be very detrimental to health, especially if it is to stretch over 15 years.
 - the hospital already underwent a large refurbishment project about 10 years ago to add 2 storeys to its current building and refurbish much of its interior. That already caused major disruption and took a very long time with noise, dirt, dust and debris and traffic problems. To undergo an even bigger exercise will be a disaster for all those living nearby.
2. Adverse Impact to traffic on Upper Stubbs Road and the roundabout area
 - the entrance to the hospital is close to the Stubbs Road roundabout and the road system will not be able to cope with the extra vehicles turning in and out of the hospital entrance unless there is a major change in the configuration of the public road, which will be very costly and difficult because of the terrain.
3. Adverse visual impact to residents of Bellevue Court and on the whole neighbourhood and environment
 - Increasing the building density and height would cause an eyesore not just for Bellevue Court residents next door, but for anyone looking at the skyline of the north side of Hong Kong Island. The 2 ultra high buildings at 41C and 41D Stubbs Road were already a huge mistake that supposedly everyone has learnt from. However, relaxation of the hospital's Height will show that lessons have NOT been learnt and that the old free-for-all practices will resume.
4. Current apparent under-utilisation and efficiency of the hospital
 - having been an active user of the hospital for private family healthcare over the years, I can say that it is not a busy hospital. There are times when beds are full but also times when many rooms are vacant. There is a large separate residential quarters building on site which does not seem to house doctors, who are all local. There seems no clear reason why the hospital would wish to expand further.

- this private hospital is not suitable for 24 Accident & Emergency and Outpatients services, so it must be questioned how much benefit does it bring to the overall community. For private hospital accommodation, we now have the choice of Gleneagles Hospital as well as HK Sanatorium and St Paul's Hospital which are not far away, so the expanded services of the Adventist Hospital are not necessary.

5. Unsuitability of the site for a large, high density hospital being so close to neighbouring resident towers.

- the access road to this site consists of a steep, long narrow road that curves its way up to the hospital. It is totally unsuitable for a higher volume or density hospital and is already quite dangerous now, when used by light goods vehicles or ambulance which leave little room for oncoming vehicles.
- the neighbouring Bellevue Court and Woodland Heights are residential towers which have been long established. A small boutique hospital with non-emergency services can be tolerated as a neighbour and service to the community, but this is not a suitable site for a larger hospital with many outpatients and increased activity.

Yours faithfully,

Charter Gold Investments Ltd (which is the owner of [REDACTED])

Business Registration No: 20045375-000-06-19-0
Certificate of Incorporation No: 554945

By its director, Paul Tao (HKID No: [REDACTED])

Tel no: +852 25203620

Fax no: +852 28656506

Postal Address: 23rd floor, Fortis Tower, 77-79 Gloucester Road, Wanchai, Hong Kong.
Email address: ptao@chonglgroup.com

Date: 10th February 2020

致城市規劃委員會秘書：

專人送遞或郵遞：香港北角源興道 333 號北角政府合署 15 樓

傳真：2877 0245 或 2522 8426

電郵：tpbpd@pland.gov.hk

To : Secretary, Town Planning Board

By hand or post : 15/F, North Point Government Offices, 333 Java Road, North Point, Hong Kong

By Fax : 2877 0245 or 2522 8426

By e-mail : tpbpd@pland.gov.hk

有關的規劃申請編號 The application no. to which this comment relates

A/14/182

意見詳情 (如有需要，請另頁說明)

Details of the Comment (use separate sheet if necessary)

Object to Adventist Hospital's Application to Relax Height Restriction because:

① The Development Height proposed is too high and incompatible with its neighbours.

(18m higher than Walled Height and 23m higher than Belvedere tower)

② This relaxation of height would make the Hospital building tendence for

the area - 5.159 Plot Ratio & 56.03% site coverage; the development

bulk and density is unacceptable as it contradicts the Mid-Rise &

Mid-Density planning intention of the OZP. (Average site plot ratio is 2.9

in the area and contrary to the mid-rise density in the area should

be 2.1% ~ 3.0%). The new hospital will simply be too big in size

「提意見人」姓名/名稱 Name of person/company making this comment Fong Wai-Kit, Victor (許

of Architectural Limited)

簽署 Signature

日期 Date

7th Feb 2020

③ Car parking provision is too excessive; 184+7 loading Bay; it contradict

the planning intention of OZP of limiting excessive development so as

the avoid "overtaking" of local roads, especially down slope roads;

④ No due consideration shown on preserving mature tree along existing

entrance ramp of Adventist Hospital.

⑤ Life tower and large carpark and access ramp block (BKC) of new development

is not compatible usually with the mid rise, mid-density of the neighbour

character, walk buddies mostly on terraces secluded by trees and

stone wall.

⑥ Granting the relaxation of Height Limit of Adventist Hospital Scheme is too

inappropriate for the neighbours who have to sacrifice development rights for

maintain the mid-rise, mid-density character of the area under the planning intention

of the OZP.

致城市規劃委員會秘書：

專人送遞或郵遞：香港北角源興道 333 號北角政府合署 15 樓

傳真：2877 0245 或 2522 8426

電郵：tpbpd@pland.gov.hk

To : Secretary, Town Planning Board

By hand or post : 15/F, North Point Government Offices, 333 Java Road, North Point, Hong Kong

By Fax : 2877 0245 or 2522 8426

By e-mail : tpbpd@pland.gov.hk

有關的規劃申請編號 The application no. to which the comment relates

A/14/182 Received on 06/05/2020

* All other objections by individual residents of Belvedere are still valid.

意見詳情 (如有需要，請另頁說明)

Details of the Comment (use separate sheet if necessary)

Please see comments / objection statement attached. Summary of

objection to Adventist's Application A/14/182. (Previously submitted

6 Feb 2020):

1) Excessive development - Height, Plot Ratio, site coverage - Insecurity to

neighbour developments who have to abide by existing bulk limitations

2) Traffic issue; excessive car park loop objected to previous applications

on traffic grounds.

3) Building mass bulk - incompatible to neighbourhood planning character

(previous objection to applications to relax P Ratio)

「提意見人」姓名/名稱 Name of person/company making this comment

簽署 Signature

日期 Date

23 May 2020

4) Prolonged construction and noise nuisance over 15 years of the

Adventist Hospital development scheme.

5) No sound reason to develop to such excessive manner.

6) Height Limit should not be relaxed because the whole neighbourhood

character will be adversely affected; very unfair to

neighbourhood development who have to limit their heights.

7) Relaxation of height will create undesirable precedent and

open to challenge by neighbourhood sites.

8) No proposal for tree preservation

The Incorporated Owners of Bellevue Court Block A, B & C
c/o Management Office, 6 Floor, Block B, Bellevue Court, 41, Stubbs Road, Hong Kong

23 May 2020

Secretary
Town Planning Board
15th Floor North Point Government Office
335 Java Road Hong Kong
North Point

Dear Sir/Madam

Re: Application to relax height restriction by HK Adventist Hospital – application no: A/H14/82

We refer to your letter (ref: TPB/A/H14/82), recently sent but undated, addressed to the Incorporated Owners of Bellevue Court Block A, B & C and their residents.

We enclosed herewith our summary of objection as well as our previous objection statement submitted to your Department and the Town Planning Board dated 2nd February 2020.

All our reasons of objection are self-explanatory and are still valid to your on-coming TP Board meeting to deliberate the Adventist Hospital application mentioned above.

Yours sincerely
For & on behalf of
the Incorporated Owners of Bellevue Court Blocks A, B & C

For and on behalf of
The Incorporated Owners of Block C,
Bellevue Court

THE INCORPORATED OWNERS
OF BELLEVUE COURT BLOCK C

Authorised Signature

For and on behalf of
THE INCORPORATED OWNERS OF BELLEVUE COURT BLOCK A

Authorised Signature

Comments on/ Objection of Adventist Hospital's application for Minor Relaxation of Building Height Restriction for Permitted Hospital Use, 40 Stubbs Road, Hong Kong
(Planning Application A/H14/82)

To: the Planning Department, North Point Government Offices, 333 Java Rd., Hong Kong
Details of Comments / Objection submitted by The Incorporated Owners of Bellevue Court Block A, B & C, (Supplementary Sheet)

We refer to the above Planning Application (A/H14/82) and would like to express our objection to Adventist Hospital's (AH) application for Building Height Relaxation and related details of the proposed design.

Our comments on and grounds of our objection are as follows.

1. Adventist Hospital's proposed Plot Ratio, Height Limit of building, Site Coverage & Car Parking numbers

1.0 Key data of AH's proposed redevelopment scheme:

- 1.0.1 Plot ratio of 5.59 (Ratio of Site Area : Gross Floor Area)
- 1.0.2 Proposed relaxation of height restriction to 208.168 meter above Principal Datum (PD). (Outline Zoning Plan height restriction is around 189 meter above PD, similar to Bellevue Court's)
- 1.0.3 Site Coverage of 56%
- 1.0.4 A total number of car parking spaces for 184 cars park + 7 lay-bys for loading/unloading of taxis, ambulances, light buses etc.

1.1 Bellevue Court's Objection The Peak Area Outline Zoning Plan (OZP) No. S/H14/6

- 1.1.1 In 2003, Town Planning Department's Peak Area OZP imposed an "Existing Bulk" restriction of plot ratio (i.e. future redevelopment to be no more than what is existing in a development) and upper limit of building heights to "existing building heights" to all 7 numbers of R(B)1 sites along Wong Nai Chung Gap Road and Upper Stubbs Road in the neighbourhood. Bellevue Court was one of the sites affected.
- 1.1.2 Individual owners and the Incorporated Owners Bellevue Court, alongside with other site owners in the neighbourhood submitted objections of the draft OZP to the Town Planning Board.
- 1.1.3 Bellevue Court's reasons for their objection were that majority of the restricted sites in the area were over 40 to 50 years old and were due for redevelopment. The newly imposed Height and Plot Ratio restrictions

would practically dampen any future potential developer's interest and incentive in redeveloping the sites affected by the OZP.

- 1.1.4 Furthermore, owners of Bellevue Court argued that it was inequitable for the government to have allowed 2 towers at 41C and 41D Stubbs Road to build to high plot ratios (5 and 8 respectively) and to excessively tall heights (67 & 69 storeys), and then afterwards harshly restricted Plot Ratio of the remaining 7 sites to existing bulk and heights. (Likewise, Nicholson Tower, was also permitted in the past to build up 30 storeys, and to a plot ratio of 5.1)

1.2 Rejection of Bellevue Court's owners objection by the Town Planning Board (TPB)

- 1.2.1 After a meeting held on the 14th March 2003, The Town Planning Board rejected Bellevue Court's and various neighbourhood owners' objections, stating the following grounds in their reply letters (See Attachment A – letter from Town Planning Board to the Incorporated Owners of Bellevue Court Block A – Ref. TPB/O/5/H14/63-)

- 1.2.2 The two "super-tall towers at 41C and 41D Stubbs Road were incompatible with the pre-dominant medium density and medium-rise development character of the area."

- 1.2.3 TPB further explained that the restrictions of Plot Ratio and Heights (to existing bulk) on the R(1) zone sites, which in Bellevue Court were to "maintain this existing pre-dominant character of the area", and to "preserve public views" and to "protect the ridge-line" (behind the sites as seen from afar)

- 1.2.4 The plot ratio restriction is "to avoid overtaxing the local road system". Increase development intensity in the uphill area "would adversely affect the traffic in the downhill area".

- 1.2.5 Development restrictions stipulated in the OZP is "to reflect the planning intention of the area."

- 1.2.6 Proposed Rezoning (by Bellevue Court and other objectors proposed an alternative higher plot ratio and height limit) would create an undesirable precedent. The cumulative effect of approving similar rezoning would result in adverse traffic impact and would change the medium rise, medium density character of the area.

- 1.2.7 In summary, the Planning Intentions behind the Outline Zoning Planning as endorsed by the Town Planning Board's meeting and subsequent hearing, can be clearly summarised as follows:

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- 1.2.7.1 The super-tall developments of the Summit & Heights (41C and 41D Stubbs Road respectively) (and by implication should include also the 30 storey towers of Nicholson Tower) are considered incompatible with development character of the area.

- 1.2.7.2 Development restrictions (of Plot Ratios and Heights) stipulated in the OZP is to reflect the planning intention of the area, which is to maintain the pre-dominant medium density and medium-rise character of the area, to preserve public view and to protect the ridge-line (of the hill behind)

- 1.2.7.3 The OZP plot ratio restrictions is also to avoid overtaxing the local road system. Increase in development intensity would adversely affect the traffic downhill from the subject area.

1.3 Existing development details of the existing sites in the neighbourhood

Sites	Ex. Plot Ratio	Ex. Height (storeys)
41 Stubbs Rd (Bellevue Court)	3.8	13s & 14s
41D Stubbs Rd * (Highcliff)	8.0 *	69s
41C Stubbs Rd * (The Summit)	5.0 *	67s
41A Stubbs Rd (Villa Monte Rosa)	3.0	21s & 22s
49 Stubbs Rd (Evergreen Villa)	3.0	18s, 20s, 21s
43A Stubbs Rd (Victoria Heights)	3.0	24s
2 Wong Nai Chung Gap Rd (Woodland Heights)	2.6	16s
4A-D Wong Nai Chung Gap Rd (Valley View)	1.7	9s
6-10 Wong Nai Chung Gap Rd ** (Nicholson Tower)	5.1 **	30s
12-14 Wong Nai Chung Gap Rd (Leon Court)	3.1	12s

* Town Planning Board considered Plot Ratio excessive and incompatible with neighbourhood's medium density, mid-rise character.

** This should also be considered incompatible with neighbourhood character as it is 30 storeys tall

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2.0 Detail grounds for Bellevue Court's Objections

2.1 The essence of Bellevue Court Objection and comments is are as follows:

2.1.1 AH's application for Relaxation of Height Restrictions

AH's current Planning application is to ask the TPA for permission to relax the OZP height restriction on their redevelopment plan from 150.518 m PD to 212.918 m PD (22.4m higher), adding 5 storeys of hospital floors above the existing height limit. This is equivalent to 7 storeys in a domestic building (assuming 3.2m per storey).

Bellevue Court, immediate neighbour AH's site on the north, is subject to OZP height restriction to its existing height of 189.42 m PD (measured to highest roof level). AH application to relax and increase their height restriction, if approved, shall be 23.459 m above the maximum height of Bellevue Court, meaning that AH height would be about 7 domestic storeys higher than Bellevue Court.

Woodland Height, neighbour to AH south boundary, is also subject to OZP height restriction. According to Figure V3.3 of AH's planning application document, it has an existing max. height of 195m PD. Consequently, AH's proposed new height of 212.918 m PD will be 17.918m higher than Woodland Height, which is equivalent to about 5.6 domestic storeys.

In other words, AH's application to relax the OZP height restriction would result in 17 redevelopment protruding some 23.5m and 18m (7 and 5.5 storeys) respectively higher than its neighbouring building heights.

In view of the OZP's original planning intention mentioned in section 1.2.7.1 to 1.2.7.3 above, the application to relax AH's height restriction is too excessive and should not be approved.

2.1.2 Excessive Plot Ratio

It should be aware that the lifting of AH's height restriction not only would result in their new development protruding above its two neighbour buildings, it would indirectly result in enabling AH's scheme to achieve a plot ratio of 5.59 for their development.

Referring to Table 1.3 above, apart from the 2 tall towers of Highcliff (plot ratios of 8 in 69 storeys) and The Summit (plot ratio 5 in 67 storeys), as well as Nicholson Tower (plot ratio 5.1 in 30 storeys), the majority of plot ratio restriction of the remain residential buildings sites along the neighbouring stretch of Stubbs Road and Wong Nai Chung Gap Road ranges from 1.7 to 3.4, with an average of 2.89. AH's proposed plot ratio of 5.59 is obviously too excessive in the area.

It should be noted also that this high plot ratio, together with the extra height and site coverage discussed below, if approved, will collectively contributed to the visual bulk of the hospital building. (see application document: figure V3.3/- viewpoint C).

Considering that the original planning intention of the OZP is to maintain the Mid-rise and Mid-density character of the neighbourhood, AH's scheme is clearly contradicting the OZP planning intention. The scheme should not be approved we see a reduction of its plot ratio, height and site coverage compatible with other sites in the area.

2.1.3 Excessive Site Coverage

In the AH planning application document, there is no data provided for comparison of site coverage of various buildings in the neighbourhood. Bellevue Court is an example of typical development built in the area in the 1960s. We therefore use Bellevue Court's site coverage to compare with the site coverage of the AH proposal.

The site coverage in the AH scheme is 56.03%, while the Bellevue Court existing site coverage is 27.5%, about half of AH's proposal.

This high site coverage is one of the contributory reasons for why AH's redevelopment is looking so visually dense, and why its upper two blocks (A&B) had to be built up to its edge boundaries, as well as the car park building fronting Stubbs being so bulky in size. (see figure 1.1 and V3.3-viewpoint C).

We therefore conclude that AH's coverage is way too excessive in relation to the site coverage of the neighbouring development and therefore must be reduced.

2.1.4 Excessive Car Park Provisions

The proposed provision of 184 carparks and 7 loading bays in the proposal is also excessive.

The additional car parks and loading bays on a total 10 levels served by a very tight access ramp would result in increase in traffic loading in the area. The provision of excessive car parking numbers not only contribute to bulk and density of the development, it also contradicts the Town Planning Board's traffic concerns and the OZP planning intention for the area. (see sections 1.2.4 and 1.2.7.3 above) This was one of the major reasons for the rejection of the previous neighbouring sites' applications to relax the plot ratio and height restriction stipulated by the OZP in 2003.

We therefore conclude that the number of carparking and loading bay is far too excessive and the TPA should not approved.

2.1.5 Undesirable Visual Impact of the redevelopment on the neighbourhood environment character

The proposed scheme is presenting an harsh looking block of carpark and access ramp (Block C) with a detached, visually intrusive lift tower fronting Stubbs Road. (see figure 1.1 and V3.3/- photomontage viewpoint C)

AH's new Block C and tower is visually at odd with the existing relationship of road and residential buildings, which, are mostly build on elevated terraces obscured, set back and lined by lush old trees and natural stone walls along the subject stretch of Stubbs Road and Wong Nai Chung Gap Road.

The proposed detached free standing front Lift Tower designed to be right in front of AH's future Block C is an unnecessary visually dominant and intrusive feature. This is foreign and not in character with the visual context of the neighbourhood.

In conclusion, the design scheme fronting Stubbs Road demonstrates the Visual Insensitivity and lack of respect to the character of the neighbourhood.

2.1.6 No proposal shown to preserve the mature trees on the existing site

From AH's proposed schematic landscape drawings (figure 1.1), there is no evidence of consideration being given to preserve the numerous decades-old mature trees currently lining on both sides of the existing road level entrance and along the access road leading up to the current hospital building.

We are of the opinion that felling of these trees would be extremely unacceptable in the interest of environmental protection and tree preservation in the neighbourhood.

2.1.7 The unreasonably long construction programme

The 3 phase long project programme stretching over 15 years in 3 phases for a private redevelopment of its scale is unacceptable to its neighbours.

The pro-longed redevelopment programme would post an unnecessary long period disturbances to the area in terms of nuisance cause by construction noise, dirt and dust pollutions, potential crime and security issues, as well as traffic delays caused by truck deliveries and utility connections work etc.

We are not sure of the reason behind its abnormally long redevelopment programme (15 year in 3 phases) and there is no clear and detailed account of how the development will be physically phased, nor to what extent existing hospital services would be disrupted or suspended during the construction period.

We are not certain why AH needs such an abnormally the long redevelopment time and phasing programme. Whether it is due to reasons such as the complexity of keeping existing hospital services in operation, or technical complexity in implementing the construction work, or due to financial constraints and cash-flow needed to finance the huge cost of site formation and building on their back slope, it all points to the possibility that AH's complex redevelopment is over-sized and over-ambitious.

In any case, the proposal is the insensitive to the site's inherent character and constraints and it contravenes to the planning intention of the Outline Zoning Plan of the area.

2.2. Is Adventist Hospital redevelopment plan fully benefit the community at large?

The AH stated that the redevelopment would increase 70% more beds provision to meet the needs to the community.

However, there is no objectively proven evidence that such demand is so large that it renders for the Town Planning Board to approve the relaxation of OZP height restriction which would result in endorsing such a high density of development in the area.

The reasons for our questioning of the over-size, over-ambitious nature of the AH redevelopment proposal is as follows:

2.2.1 Adventist Hospital is high quality but very expensive private hospital, affordable by and benefiting only high-net worth individuals and executives of large companies in the community, and not the general public at large.

2.2.2 The proximity of site location on Hong Kong Island is not short of private hospitals. Examples are:

- A Gleneagles Hospital at lower Nam Fung Road (500 beds)
- B St. Paul's Hospital, with its recently built extension at the bottom of Tai Hang Road (400 beds)
- C HK Sanatorium & Hospital in Happy Valley (480 beds)

In addition there are also the old private Matilda Hospital at the Peak and Caritas Canossa Hospital in Old Peak Road Central.

2.2.3 In view of the above and the undesirability of AH's over-size proposal we strongly recommend that AH's project should be cut back to a more reasonable size with plot ratio, site coverage and heights (not to exceed the OZP height) that can commensurate and enhance the character and suburban quality of the neighbourhood.

Sq1 5-31

tpbpd@pland.gov.hk

寄件人: [REDACTED]
 收件日期: 2020年05月27日 星期三 10:42
 收件人: tpbpd@pland.gov.hk
 主题: Your Reference no. A/H14/82
 附件: Stubbs Road Planning Comments.pdf

Dear Sir / Madam

My comment is as attached, please take into consideration.

Best regards
 Cherie Chung

3.0 Conclusion

The Town Planning Department and Town Planning Board is requested to refrain from approving Adventist Hospital's height limit relaxation application for reasons below:

3.1 The development is excessive in Height, Plot Ratio and Site Coverage, resulting to an excessive building bulk, for reasons outlined in detail in Section 2.1 above.

3.2 The traffic generated by the additional car parking in the new development directly contradicts the very reason why height and plot ratio had to be restricted under the 2003 OZP. The carpark numbers are unacceptably too high.

3.3 AH's application report has not given due consideration to the development's visual impact and its respect to the character of the neighbourhood, and has no concrete proposal on how to conserve the existing mature trees in the area..

3.4 The application has not demonstrated how it would mitigate the potential prolonged nuisance caused by the redevelopment process nor has it outlined how its medical operational and services is affected and organised during the phased construction work.

3.5 Adventist Hospital is supposed to be a NGO providing medical service to the community and should not be seen profiteering from it. There are plenty of expensive private hospital capacities on Hong Kong Island. Given the context of the site, there is no sound reason for AH to redevelop to such an excessive manner.

3.6 Referring to the Town Planning Board's previous disapproval letter to Bellevue Court's application dated 28 March 2003 (reference TPB/O/S/H14/6-3), approving AH's application to relax height limit is inequitable to all owners in the near neighbourhood, whose previous developmental potential had to be reduced, height restricted and sacrificed for the common purpose of conserving the 'mid density' and 'mid-rise' character of the neighbourhood, as well as to avoid over taxing of traffic on the local road network.

If the Town Planning Board is to approve AH's current application to relax their OZP height restriction, it would create an undesirable precedent that destroy the integrity of the original planning intention, and potentially open up to challenge through Judicial Review in the future by owners in the neighbourhood.

For and on behalf of:

The Incorporated Owners
 of Bellevue Court Block A
 Wendy Lee

The Incorporated Owners
 of Bellevue Court Block B
 Tony Wong

The Incorporated Owners
 of Bellevue Court Block C
 Victor Fong

Date: 27 May 2020

Date: 27 May 2020



ROSARY HILL SCHOOL
41-B, STUBBS ROAD
HONG KONG

玫瑰崗學校
香港司徒拔道 41 號 B

致城市規劃委員會敬啟者：

專人送達或郵遞：香港北角渣甸道 333 號北角政府合署 15 樓

傳真：2877 0245 或 2522 8426

電郵：tpbpd@pland.gov.hk

To : Secretary, Town Planning Board

By hand or post : 15/F, North Point Government Offices, 333 Java Road, North Point, Hong Kong

By Fax : 2877 0245 or 2522 8426

By e-mail : tpbpd@pland.gov.hk

28 May 2020

Planning Department

North Point Government Offices

333 Java Road, North Point,

Hong Kong



By Hand

Sgt 5-32

Re.: Your Ref.: Proposed Minor Relaxation of Building Height Restriction for Permitted

Hospital Use

40 Stubbs Road, Hong Kong

(Application No. A/H14/82 - Submission of Further Information by Applicant

Dear Sirs,

We reply to your invitation for public comments on the information received in regards to the proposed "minor" changes.

1. Let me state first that from the information received we cannot understand the scope of the relaxation of building height restriction. We are not experts in the reading of these plans, we also asked other people who could be more familiar, and they could neither give us a reply.
2. As we have understood, this hospital was not built as "community hospital". The little information we can obtain from the "Broad Development Parameters of the applied Use/Development in respect of Application No. A/H14/82", the size would be much within a large scale hospital.
3. As school with children from 2 years old up to pre-university level, we are concerned with the health of our large number of students and staff. We are still coming out from a pandemic that luckily has not punished Hong Kong as severely as it has happened in many other places in the world. Having a very large hospital so near would be a major source of concern for all our present and future parents, and of trepidation for the school administration.
4. The traffic of Stubbs Road is a big problem; we all know too well that Stubbs Road cannot accommodate so many vehicles. Just a reference: within a small perimeter there are at least 6 schools, three of them international that depend much more on private transportation. The hospital is just at the entrance of a very busy roundabout that at times cannot cope with all the heavy traffic. Looking at the information provided, the number of private cars, taxis, service cars, etc. would increase very remarkably the traffic up and down Stubbs Road when the project of the hospital is finished.

有關的規劃申請編號 The application no. to which the comment relates

A/H14/82 Received on 06/05/2020

意見詳情 (如有需要, 請另頁說明)

Details of the Comment (use separate sheet if necessary)

1) Close proximity- The hospital is already located at a proximity to the residential block of 41 Bellevue court.

2) Environmental Impact- Noise and air pollution during construction. It would unreasonably affect our condos residences as well as the neighborhoods.

3) Traffic Impact- There are 2 schools and a few sizable condos on Stubbs road itself. And another 3 schools within 2 kilometers. Residences here already experiencing heavy traffic during peak hour.

4) Further review- There are already 3 hospitals in the neighborhood. Sanatorium hospital at happy valley and Ruttonjee hospital at the end of lower Stubbs road and they all within 2 kilometers! The needs of further expansion of the Adventist hospital should undergo further review.

「提意見人」姓名/名稱 Name of person/company making this comment

Cherie Ching

簽署 Signature

日期 Date

May 27 2020



ROSARY HILL SCHOOL
41-B, STUBBS ROAD
HONG KONG

玫瑰崗學校
香港司徒拔道41號B

Seg 5-33

致城市規劃委員會秘書：

專人送遞或郵遞：香港北角遼寧道333號北角政府合署15樓
傳真：2877 0245 或 2522 8426
電郵：tpbpd@pland.gov.hk



To : Secretary, Town Planning Board

By hand or post : 15/F, North Point Government Offices, 333 Java Road, North Point, Hong Kong

By Fax : 2877 0245 or 2522 8426

By e-mail : tpbpd@pland.gov.hk

5. The altitude of the building, as we said previously, we don't know its height from the information provided, but after the two very big "sins" that we already have in our neighbourhood, we are really concerned. Not only the view and the landscape, but also we are very concerned with the natural fluidity of the air, with the environmental and ecological effects it may create.

6. We understand that the construction will be finished by 2035, a length of 15 years, very long time being subordinated to the effects of a construction nearby.

7. As a last point we would also mention the open door for the developers and speculators operating around this area: we are afraid that their influence may change the limits placed in constructions in this part of Hong Kong, making changes in development laws that would contravene the original planning in this part of Hong Kong.

We are grateful for your attention to the points that we bring to you for your consideration at the time when the Board convenes for discussion on the project mentioned above.

Yours faithfully,

Fr. He Yousun
Supervisor

Fr. He Yousun
Supervisor

Web page: www.rhs.edu.hk

E-mail: info@rhs.edu.hk

Fax: (852) 2838 5141

Tel: (852) 2572 0228

有關的規劃申請編號 The application no. to which the comment relates

A/H14/82 Received on 06/05/2020 * Previous comment application on 6/2/20

意見詳情 (如有需要, 請另頁說明)
Details of the Comment (use separate sheet if necessary)

Despite submission by NSP's report to EPP comments, I continue to object to the hospital redevelopment plans.

- 1) There remains no compelling reason why we need a larger project making hospital in a residential area. There is no immediate public need for another hospital in part of Queen Mary's expansion. There are 3 private hospitals in the area, and more public hospitals are under construction. It will be a 15 year project. Who will ensure any improvement? I look forward to seeing the progress during construction & post construction will cause increased

「提意見人」姓名/名稱 Name of person/company making this comment MOTH TAN

簽署 Signature *Moth Tan*

日期 Date 27/5/2020

Even my father's physician at the hospital is very persuasive that this area can handle the new traffic.

- 4) Height limit cannot be amended - it already resulted in 2 skyscrapers, high cliffs & summit. Both negatively & adversely affects the neighbourhood character. It also is evident that landscape is as your board did not ensure highest restrictions applied to most of the other buildings in area were enforced. A poor decision.
- 5) There is no proposal to preserve all the greenery & trees that are possible on government land. We don't need more concrete in a residential area. What about the residents' well-being?



The Incorporated Owners of Villa Monte Rosa

41A, STUBBS ROAD, HONG KONG.
TELEPHONE: 2575 3534, 2572 8835
FAX NO. 2481 9707

玫瑰新
業主立案法團
電話：二五七五三一
二五七五三二
二五七五三三
二五七五三四
二五七五三五
二五七五三六
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二五七六〇〇



Our Ref: (026) in VMR (cont'd) 2020

Date: 2nd June, 2020

The Secretary of the Town Planning Board
15th Floor, North Point Government Offices,
333 Java Road,
North Point,
Hong Kong

Dear Sirs,

Re: Comments on the Supplementary Information of Planning Application (No. A/H14/82)
Proposed Minor Relaxation of Building Height Restriction for
Permitted Hospital Use at 40 Stubbs Road, Hong Kong

We refer to the supplementary information of planning application (No. A/H14/82) submitted by the applicant on 6th May 2020 regarding the proposed relaxation of building height restriction for Hong Kong Adventist Hospital ("HKAH") at 40 Stubbs Road. On behalf of the residents of the 240 units in Villa Monte Rosa ("VMR"), 41A Stubbs Road (details attached), we strongly object to the application and have the following comments:-

- In the Responses-to-Comments to Environmental Protection Department ("EPD"), various deficiencies and omissions are noted. There are no definitive responses regarding the revisions and/or remedies in the response column.
- The revised Environmental Assessment (EA) Report does not provide informative inputs and illustration of whether the issues will be adequately addressed and how. There is no evaluation of the effectiveness of the mitigation measures.
- There are a few potential hazards, such as land contamination and sewage impact, which are not immediately addressed in the documents.
- In the revised EA Report, why is VMR not included as "Air and Noise Sensitive Receiver" in the respective analysis? VMR is well within the statutory 500M (for Air) and 300M (for Noise) distance from the subject lot. However, the applicant only includes Rosary Hill School, Bellevue Court Block C and Woodland Height Block A.

e) In the revised EA Report, paragraph 3.4.1 on Mitigation Measures at Construction Phases, HKAH's answers are extremely vague and lacks any details. The noise will be a serious nuisance for VMR residents during the entire construction period.

f) VMR is very concerned on Traffic Impact Assessment (TIA) as this is fundamental to the proposed additional development. Unless and until the TIA is acceptable to the Transport Department, the proposal should not be considered at all.

g) The proposed development should demonstrate if the plot ratio does not currently exceed its limit, what is permitted under the lease for this lot?

Finally, the time period allotted for comments to be submitted by the public is an unreasonably short period for the affected parties to respond to a massive redevelopment project that has serious implications for all nearby residents. We ask that you extend the consultation period and require the HKAH to respond to the omitted questions and comments from the EPD and nearby residents.

We look forward to your earliest response.

Should you have any queries, please contact our Estate Manager, Ms. Anna Lai at 2572-8836.

Yours faithfully,
For and on behalf of
The Incorporated Owners of Villa Monte Rosa

Mr. Leland Sun
Chairman

致城市規劃委員會秘書：

專人送遞或郵遞：香港北角遼寧道 333 號北角政府合署 15 樓

傳真：2877 0245 或 2522 8426

電郵：tpbpd@pland.gov.hk

To : Secretary, Town Planning Board

By hand or post : 15/F, North Point Government Offices, 333 Java Road, North Point, Hong Kong

By Fax : 2877 0245 or 2522 8426

By e-mail : tpbpd@pland.gov.hk



S-35



康業服務有限公司
Hong Yip Service Company Ltd.
(A Member of Ben Hong Ltd Properties)

HY-WH-12020-043

The Secretary of TPB
15th Floor, North Point Government Office
333 Java Road
North Point
Hong Kong

Dear Sirs,

Comment on the Proposed Minor Relaxation of Building Heights Restriction for Permitted Hospital Use Planning application of Redevelopment of Adventist Hospital at 40 Stubbs Road (N. A/H14/82) from Woodland Heights, no. 2 Wong Nai Chung Gap Road, Hong Kong

有關的規劃申請編號 The application no. to which the comment relates

A/H14/82 Received on 06/05/2020

意見詳情 (如有需要, 請另頁說明)

Details of the Comment (use separate sheet if necessary)

1. Response to EPD have various deficiencies & omissions. No alternative response regarding the ventilation and air remediation. The response is unclear.
 2. In the EA report, it was not provided information regarding the impact of the proposed development on the surrounding area. The impact will be adequately addressed & improved. There is no evaluation of the effectiveness of the mitigation measures.
 3. There are a lot of potential hazards, such as land contamination & seismic impact, which are not immediately addressed. (提意見人, 姓名/名稱 Name of person/company making this comment KUK K CH FUN, JANU)
- 簽署 Signature KUK K CH FUN 日期 Date 30/5/2020
4. In the EA report, Villa Monte Rosa is not included as 'Air & Noise Sensitive Receiver' in the respective analysis. VNR is well within the statutory 500M (for Air) & 300M (for Noise) distance from the subject lot.
 5. In the EA report, para. 3.4.1 on Mitigation measure at Construction Phase, HKAH's answer and way for vague & without any details. The noise will be an annoying issue for 2-VNR for the whole construction period & should be seriously watched on.

2 June 2020



5-36

Traffic congestion

We realize that lower Stubbs road to Wanchai is busy frequently and when it is really heavy, the road is filled and block the junction at the roundabout of upper Stubbs road/Tai Hang/Wong Nai Chung Road (the "junction") and the busy sessions are morning/evening and mid-afternoon when classes dismiss.

The Traffic Impact Assessment (TIA) from the Application however concluded it to the contrary and we have queries to the following:

- the date the Traffic Survey was conducted;
- the raw data that formed the premises may be flawed;
- scenario of the traffic is not well covered.

We realized that a car-count manual survey was one weekday in January 2019 (paragraph #3.3 of TIA) but mindful that a day in January was around festive seasons of Christmas, New Years and CNY where Traffic would be light as schools (Rosary Hill, Lingnam, French IS) were on holidays, people went on vacation and even patients would not prefer being hospitalized at new year days. Taking survey to that period could lead to a misleading basis of light traffic for base study and its projection.

We also realize that operations of Adventist Hospital would be running in parallel with the construction work until its completion in year 2035 (#4.1 of the Planning Statement) and this might span probably 10 years. Construction attracts traffic from its plant and lorry e.g. concrete mixers in queue, trucks. There are hundreds of workers attending works and it imposes traffic load to the roads around. The situation would be aggravated when roads around are blocked to facilitate their connecting work, e.g. laying pipes and cables. All these had significant impact to the traffic and we are very surprised that the TIA did not address these impacts.



Noise

The massing of the new hospital block (Block B) is in the similar position of the current La Rue Building and there will be a continuous row of pipe pile wall abutting the site boundary. This row of piles sinks 30 m into the ground. (Schematic plan LGJF to Geotechnical Review from David Au) and the construction of these piles and subsequent erection of the tower inevitably emits high level of noises.

Woodland Heights is the Identified Noise Sensitive Receiver and Block A/B is located 7m from the new block. (Table 3.1 to Environmental Assessment report). What had been suggested in the report resorted to contractor's good practice in the choice of plant and noise muffler/barrier WITHOUT figuring out a solution.

Safety

The hospital aims to expand its building bulk, it goes above ground and underground to build higher and deeper respectively. When it goes underground, it disturbs the soil and ground water. Woodland Heights are erected by the hillside and some grounds we step on, e.g. driveway, pedestrian walkway, our communal lawn at the front are merely supported by compact soil. When our neighbor Adventist starts to excavate, ground water drains away and our grounds settle and cracks.

Woodland Heights and Adventist hospital were all built physically on the same platform sharing the same hillsides, demarcation on boundary was made on paper for ownership and liability purposes only. When there are heavy works at our neighbor site Adventist, load path of soil stability shifts, Woodland Heights are literally affected; by the same token, slope features for which we have been assigned responsibly to would be at risk.

Light and Air quality

The Environmental Assessment report identified the emitted pollution from the hospital during construction and operation and ways to mitigate it, however it fell short of telling how the light and air circulation would be after the erection of the new blocks.

The massing of the 4 new blocks A, B, C and carpark, Block B & C would take up approximate location of current La Rue Building and the hospital block, but higher and bulkier. Because of the height, the air movement and sunshine will change.

Woodland Heights block A and B is a stone throw, 15 m or so, from Adventist and we must be suffered in these aspects. What's taken from Woodland Heights should be minimized or else compensated.

Visual Impact

Adopting the same rationale as above, the current Application from the Adventist focused only on their visual outlook singly. Woodland Heights which located next shared with them a same stone retaining wall at the roundabout junction. There was no indication how this joint wall would be dealt with.

Health Issue

Hospital brings convenience to us and at the same time brings potential hazards of germs and disease to this district

Yours faithfully,

For and On Behalf Of

The Incorporated Owners of Woodland Heights

Copy to Committee of The Incorporated Owners of Woodland Heights

5-37

就規劃申請/覆核提出意見 Making Comment on Planning Application / Review	
參考編號 Reference Number:	200601-170114-86569
提交限期 Deadline for submission:	02/06/2020
提交日期及時間 Date and time of submission:	01/06/2020 17:01:14
有關的規劃申請編號 The application no. to which the comment relates:	A/H14/82
「提意見人」姓名/名稱 Name of person making this comment:	女士 Ms. 張嘉莉
意見詳情 Details of the Comment:	
有居民向本區議員辦事處反映，擔心此項目會對該區交通帶來負面影響：現時清安醫院外的迴旋處經常車多，他們擔憂工程期間會有不少重型車隻出入，令交通擠塞，而醫院擴建後，汽車流量增加，也令他們十分憂慮。 另，也有居民提出建議的建築設計，外型龐大，未能配合旁邊的建築和環境景觀，期望設計可更多考慮社區環境的城市景觀設計。	

tpbpd@pland.gov.hk

5-38

收件人: [REDACTED]
 寄件日期: 2020年06月01日 星期四 - 17:27
 收件人: tpbpd@pland.gov.hk
 寄件人: Ivan: William Ho
 主題: Comments to Planning Application No. A/H14/82
 附件: 20200601 Comments to 40 Stubbs Rd.pdf

1 June 2020

To: Secretary, Town Planning Board, Planning Department
 15/F, North Point Government Offices, 333 Java Road, North Point, HK
 Email: tpbpd@pland.gov.hk

From: Christina Hu Chia-ling, Owner,

Tel: [REDACTED]

Email: [REDACTED]

Cc: Ivan Wong Wang-tai
 Wanchai District Council Member
 Email: [REDACTED]

Related to: Planning Application No. A/H14/82

Dear Sir / Madam,

We request the following comments to be addressed in the planning application No. A/H14/82:

1. Provide detailed assessment and mitigation of potential traffic impact during the planned 15 years redevelopment project and subsequent opening of the planned expanded hospital.

a more sustainable community, as promoted by the industry professionals and the government, with emphasis to preserve the current hillside landscape, natural airflows and open view of this neighborhood.

Thank you and I look forward to receiving your response to the above comments.

Kind regards,

Christina Hu Chia-ling

• The roundabout at Stubbs Road/Wong Nai Chung Gap Road/Tai Hang Road experiences heavy traffic flow through out the day.

• There are good number of schools in the neighborhood, including Marymount Primary and Secondary School, Bradbury School, The Rosaryhill School, The French International School, the Japanese School Primary Section and Hong Chu Lions Morninghill School. During the morning drop-off and afternoon pick-up hours, the roundabout traffic becomes a significant bottleneck due to increased traffic flow related to school buses, private cars, public transportation and related traffic support.

• There are a few site seeing spots currently on lower and upper Stubbs Road and on Wong Nai Chung Gap Road. Coaches would make stops for tourists to enjoy the open view and take photos. These activities also contribute to the heavy traffic conditions to the neighborhood.

• The planned hospital expansion, including more bed spaces, consultation rooms, vehicle spaces, loading/unloading bays, accommodations, and related public transportation support, will add greater pressure to the existing traffic situation in the neighborhood.

2. Provide information and assurance on slope safety and foundational safety of neighboring buildings, which may be impacted by the site formation and foundation works of this redevelopment project.

• Separated by a small creek, the Bellevue Court is meters away from the redevelopment project site, and the building age is 55 years.

• Woodland Heights is also meters away from the redevelopment project site, and the building age is 55 years.

3. Provide justification for an expanded hospital facility in this neighborhood, when currently the residents are served by a good selection of private and public hospitals, the Hong Kong Adventist Hospital being one of them. Below are the estimated distance between the nearby private hospitals and the redevelopment project at 40 Stubbs road:

• Hong Kong Sanatorium & Hospital is 3km away

• Saint Paul's Hospital is 3.3 km away

• Gleneagles Hong Kong Hospital, opened in March 2017, is 3.6km away

• Matilda International Hospital is 6.6km away

It is not clear to the residents that there is anticipated demand or benefits for an expanded hospital to outweigh the cost and impact to the neighborhood.

4. In response to the revised Environment Assessment Report, please provide further details on a) the demolition plan to be conducted in an eco-friendly way and b) the design and construction to adopt green building standards for

1 June 2020

To: Secretary, Town Planning Board, Planning Department
15/F, North Point Government Offices, 333 Java Road, North Point, HK
Email: tpbpd@pland.gov.hk

From: Christina Hu Chia-ling, Owner.

Tel: [REDACTED]

Email: [REDACTED]

Cc: Ivan Wong Wang-tai
Wanchai District Council Member
Email: [REDACTED]

Related to: Planning Application No. A/H14/82

Dear Sir / Madam,

We request the following comments to be addressed in the planning application No. A/H14/82:

1. Provide detailed assessment and mitigation of potential traffic impact during the planned 15 years redevelopment project and subsequent opening of the planned expanded hospital.

- The roundabout at Stubbs Road/Wong Nai Chung Gap Road/Tai Hang Road experiences heavy traffic flow through out the day.
- There are good number of schools in the neighborhood, including Marymount Primary and Secondary School, Bradbury School, The Rosaryhill School, The French International School, the Japanese School Primary Section and Hong Chu Lions Morninghill School. During the morning drop-off and afternoon pick-up hours, the roundabout traffic becomes a significant bottleneck due to increased traffic flow related to school buses, private cars, public transportation and related traffic support.
- There are a few site seeing spots currently on lower and upper Stubbs Road and on Wong Nai Chung Gap Road. Coaches would make stops for tourists to enjoy the open view and take photos. These activities also contribute to the heavy traffic conditions to the neighborhood.
- The planned hospital expansion, including more bed spaces, consultation rooms, vehicle spaces, loading/unloading bays, accommodations, and related public transportation support, will

add greater pressure to the existing traffic situation in the neighborhood.

2. Provide information and assurance on slope safety and foundational safety of neighboring buildings, which may be impacted by the site formation and foundation works of this redevelopment project.

- Separated by a small creek, the Bellevue Court is meters away from the redevelopment project site, and the building age is 56 years.

- Woodland Heights is also meters away from the redevelopment project site, and the building age is 55 years.

3. Provide justification for an expanded hospital facility in this neighborhood, when currently the residents are served by a good selection of private and public hospitals, the Hong Kong Adventist Hospital being one of them. Below are the estimated distance between the nearby private hospitals and the redevelopment project at 40 Stubbs road:

- Hong Kong Sanatorium & Hospital is 3km away
- Saint Paul's Hospital is 3.3 km away
- Gleneagles Hong Kong Hospital, opened in March 2017, is 3.6km away
- Matilda International Hospital is 6.6km away

It is not clear to the residents that there is anticipated demand or benefits for an expanded hospital to outweigh the cost and impact to the neighborhood.

4. In response to the revised Environment Assessment Report, please provide further details on a) the demolition plan to be conducted in an eco-friendly way and b) the design and construction to adopt green building standards for a more sustainable community, as promoted by the industry professionals and the government, with emphasis to preserve the current hillside landscape, natural airflows and open view of this neighborhood.

Thank you and I look forward to receiving your response to the above comments.

Kind regards,

Christina Hu Chia-ling

致城市規劃委員會秘書：

寄人送達或郵遞：香港北角達華道 333 號北角政府合署 15 樓

傳真：2877 0245 或 2522 8426

電郵：tpbpd@pland.gov.hk

To: Secretary, Town Planning Board

By hand or post: 15/F, North Point Government Offices, 333 Java Road, North Point, Hong Kong

By Fax: 2877 0245 or 2522 8426

By e-mail: tpbpd@pland.gov.hk

有關的規劃申請編號 The application no. to which the comment relates

A/H14/82 Received on 06/05/2020

意見詳情 (如有需要，請另頁說明)

Details of the Comment (use separate sheet if necessary)

15年發展大區，發展影山向附近增加之上，改善環境。

對如何處理保留區作以控制，應否未提，發展

時期大區，前所未有，風險很大。

另有在九龍區在另外一頁。

「提意見人」姓名/名稱 Name of person/company making this comment 黃宏泰

簽署 Signature 日期 Date 2/6/2020

2/3

反對此申請

1. 就此申請從未諮詢區議會意見，此申請之前亦未和醫院鄰近的屋苑作任何深入溝通，沒有維持社區和諧。提出之交通環境評估報告十分粗疏，未能顧及灣仔半山現今及未來十年，交通日見繁忙之實際問題。
2. 醫院興建之部分設施是不必要地放在申請內，故此提出之不必要空間可令到擴充之高度不符申請即屬高，高度限制申請放寬是絕對不必要的。

3. 整個區劃劃時 15 年，完全不合常理及周圍環境遷生活環境之長期影響，當局非常自私之構想，對區內居民寧靜感生活環境亦置之不理。對病人在建築期內之照顧到今天還未有一套解決方案，未盡醫院應有之基本責任。一般流行病社區和醫療成十分之影響條例，另此申請全面推銷規劃多年，對此區實施之高度限制否在規劃前決定，在沒有具體合理情況下，任意再度提高申請。

4. 多年前的構思，港安醫院只是作為小型社區醫院，其地址及面積絕非適合作為大型綜合醫院，現有規模以遠超出原意。港安醫院適合通地點作何項大計，將此地交回政府以作換地申請。

5. 總結此項申請得不到社區之任何支持，及引起不清楚之交待，令社區產生極大之迴響及反對，實屬令人遺憾。作為當區區議員，本人亦難以根據任何合理情況，理由或社區所需而支持此申請。經考慮及平衡各方意見後，本人對此次申請不得不作出保留及反對。

黃宏泰
灣仔區議員
司徒拔道選區

Seq 1 5-40

就規劃申請/覆核提出意見 Making Comment on Planning Application / Review	
參考編號 Reference Number:	200602-233246-22695
提交限期 Deadline for submission:	02/06/2020
提交日期及時間 Date and time of submission:	02/06/2020 23:32:46
有關的規劃申請編號 The application no. to which the comment relates:	
A/H14/82	
「提意見人」姓名/名稱 Name of person making this comment:	女士 Ms. Ida
意見詳情 Details of the Comment:	
The building is quite massive and not in harmony with the neighborhood and setting. We see the whole front block and a large portion of another block are used as carpark, which not only adds to the building bulk, but the about 200 carpark space would also add much to the traffic load. Suggest to reconsider the provision of carparks, and thus reduce the building bulk and improve the relationship with the street.	

tpbpd@pland.gov.hk

Seq 2 5-41

寄件者: [REDACTED]
 寄件日期: 2020年07月04日 星期六 256
 收件者: tpbpd
 主題: Fwd: A/H14/82 Adventist Hospital Stubbs Road
 附件: Hospital Beds HK.pdf

Dear TPB Members,

Some additional potted plants and fake grass on rooftops do not address the core issues.

There are more than sufficient private hospitals beds on HKI to meet demand, particularly as medical tourism will be restricted for who knows how long.

The current health crisis has revealed that these hospitals are nothing but parasites. They take full advantage of GIC zoning, tax free status and are top of the list for government handouts. Not one of them has reached out to the community during the health crisis nor made any attempt to utilize their idle facilities and manpower to relieve the pressure on our public health system.

The proposed redevelopment will not only bring no benefit to the community, it would have a negative impact on the local environment and exacerbate traffic congestion at a key junction.

Previous objections upheld.

Mary Muivihili

From: [REDACTED]

To: "tpbpd" <tpbpd@pland.gov.hk>

Sent: Monday, February 10, 2020 3:43:27 AM

Subject: A/H14/82 Adventist Hospital Stubbs Road

A/H14/82

Adventist Hospital, 40 Stubbs Road, Hong Kong

Site area : About 7,933.8sq.m

Zoning : "GIC"

Applied development : Minor Relaxation of Building Height Restriction for Permitted Hospital Use (70% increase in possible occupancy)

4 Blocks / 16-16-10-3 floors / PR 5.59 / SC 56.03% / 231 Beds / 65 Rooms / 191 Vehicle Parking

Dear TPB Members,

At a time when Hong Kong people are very concerned about contamination, this private hospital, already uncomfortably close to many hundreds of residential units, is proposing to extend its premises to cover almost the entire site. The site coverage quoted is misleading as the building will be extended incrementally in line with the hillside behind.

There will be wards in very close proximity to the adjoining towers on both sides. There is also a school close by.

Block A and Block B would be built further back and it is clear that cross ventilation would not be possible.

Well designed open space to be enjoyed by the public? Ridiculous as nobody would choose to hang out close to a hospital. Moreover the site is next to one of the most well known trails, Bowen Road.

The facility would attract more traffic on an already saturated junction.

It is quite clear that hospitals should be located in well ventilated areas, preferably some distance from residences. Moreover there is no need for additional private hospital facilities on HK Island as is clear from the attached data.

Additional beds are to cater not for local but for medical tourism. They should be located close to the airport, HKMZ Bridge or border crossings. Why have sick people, sometimes with contagious conditions, transported long distance through the territory posing health risks?

Contagion is now a major issue, it should be minimized. With all the hoo-haa about integration with the Greater Bay Area, it is quite clear those additional facilities that are not required for the local population should be sited close to the border.

Have local residents been consulted on this plan? I have not read anything in the media.

This development is all about making money with no consideration for the impact on the local populace.

Members hopefully will take on board the issues that have surfaced during the current health crisis and reject this application as inappropriate for the location.

Mary Mulvihill

Analysis of location of hospital beds

Area		Population		Hosp Beds		Public		Private		Total		Sur/Def		Pop	
2019		5,511,000		6,930		6,274		8,114		1,184		2026		5,511,000	
Hong Kong Island		1,260,000		6,930		6,274		8,114		1,184		2026		5,511,000	
Kowloon		2,280,000		12,540		12,883		2,145		15,028		2,381,600		13,100	
New Ts (including marine)		3,960,000		21,780		9,198		1,480		10,678		4,282,200		23,550	
Total		7,500,000		41,250		28,355		5,465		33,820		7,824,300		43,030	
Note : Data		Census & Statistics		HKI surplus		1,734									

Information on public hospitals taken from HA Annual Report 2017-2018
http://www.ha.org.hk/ho/corpcomm/AR201718/PDF/HA_Annual_Report_2017-2018.pdf
 Information on private hospitals taken from HA Annual Report 2016-2017 and updated from websites

Private Hospitals		Kowloon		860	
HK Island		Baptist		175	
Adventist		Caritas		60	
Canossa		Evangel		1,050	
Gleneagles		St. Teresa		480	
Matilda		NT E&W		100	
St. Paul's		TW Adventist		470	
HKSH SKW 20		Union		600	
		CUHK (2020)		1,480	

		2013		2018	
		HKI		Future	
		KL		30	
		NT		52.2	
				100	
				100	
				100	
				14	
				23	
				86	
				14	
				14	

District Council District		2016	2017	2018	2019	2020	2021	2022	2023	2024	2025	2026
Projected Population by District Council District, 2018-2026												
PLANNING DEPT												
Central and Western	243300	244600	246700	241000	237900	234500	228800	224200	219700	213800	215800	213800
Wan Chai	180100	181400	183100	178000	175900	173800	168200	165100	161600	155000	154800	154800
Eastern	555000	551400	550900	548000	547600	546200	536600	529700	526200	520300	515000	515000
Southern	275000	271000	272300	269500	268200	266900	263300	270200	274800	275500	275800	275800
Hong Kong Island	1253400	1248500	1253000	1236500	1225500	1208000	1197000	1189200	1182200	1177200	1160500	1160500
Sham Shui Po	405900	406900	403400	429200	447600	458900	460300	460900	467800	467500	467600	467600
Kowloon City	418700	417800	419700	423900	429200	428200	431700	439300	458700	467000	465500	465500
Wong Tai Sin	425200	424800	424500	422300	422500	430100	430600	431000	437200	435300	433900	433900
Kwan Tong	648500	669400	685300	698400	699300	702000	704000	711600	715800	718300	721200	721200
Yau Tsim Mong	343000	337200	334500	328400	326900	323400	316900	308800	307300	302900	295400	295400
Kowloon	2241300	2256100	2267300	2302200	2330500	2342600	2344300	2352500	2384800	2391000	2381600	2381600
Kwai Tsing	520600	515600	516500	513800	513800	513000	512000	523000	522300	522700	520400	520400
Tsuen Wan	318900	317100	313400	313300	315500	315200	309900	308000	307100	304800	304800	304800
Tuen Mun	489300	488400	503500	506200	509900	514400	536400	540900	550900	570100	571700	571700
Yuen Long	614200	630200	640000	649000	649500	654000	658300	660800	658600	673400	700400	700400
Tai Po	309900	306500	308600	307300	324600	325600	336700	372900	374300	374300	405800	405800
Sha Tin	659800	662100	683700	693000	704800	716600	716200	718200	714100	712500	708600	708600
Sai Kung	465900	471500	474200	479500	492400	500200	508700	511000	511000	523200	525900	525900
Islands	156800	162900	173800	186600	187800	188900	196000	193600	193800	193500	193400	193400
New Territories	3840600	3886000	3929000	3962800	3997000	4043900	4116200	4162700	4180300	4239000	4282200	4282200
New Towns	3438200	3464200	3492600	3515000	3547800	3593400	3635100	3673400	3684300	3698600	3694600	3694600
Other Areas	402400	412800	436400	447800	449200	450400	481100	489200	496000	525400	587500	587500
Land Total	7335400	7390600	7449300	7501400	7557000	7607300	7656600	7704400	7747400	7787700	7824200	7824200
Whole Territory	7336600	7391700	7450500	7502600	7558100	7608400	7657700	7705400	7748400	7788700	7825200	7825200

10 July 2020

**The Secretary of Town Planning Board
c/o Planning Department
North Point Government Offices
333 Java Road, North Point
Hong Kong**

Dear Sirs,

Redevelopment of Adventist Hospital at 40 Stubbs Road
Planning Application for Minor Relaxation of Building Height/Planning Application A/1414/182
Supplementary Information Issued 12 June 2020 to Public Enquiry
Comments and Objections from Woodland Heights, 2 Wong Nai Chung Gap Road

Thank you for your recent circular on 12 June 2020 providing supplementary information from the Adventist Hospital ("the Hospital"), in response to our opinion issued on xx Feb 2020 to the captioned.

We fail to find from the latest information sufficient justification in approving the relaxation of building height to the Hospital. The information is lacking its clarity and being imprecise, if not evasive, in addressing our grave concerns over issues we have raised. These concerns are the material consideration called for at the Outline Zoning Plan S/H4/13. Paragraphs #7.3~ 7.4, #8.4.1, #8.4.5, #8.4.8 of the explanatory statement. Thus we maintain our stance of objections to building height relaxation to the Hospital application.

Document Reference

We review and make reference to the following information to the Application:

- Knight Frank Letter 20 June 2020. Ref: [LAS/AC/CX/71/18019139](#), enclosing supplementary information under six attachments (i to iv);
 Outline zoning plan S/H14/13
 Planning Department letter 21 Jan 2020 enclosing the Hospital original application and the following:
 Plans and Sections of the proposed redevelopment, photomontage and landscape plan
 Planning Statement (Knight Frank Report)
 Environmental Assessment (EA), Traffic Review Report (TRR), Visual Impact Assessment, Tree Survey, Geotechnical Review (GR) from various technical consultants.



Summary of Concerns and Objections

We follow the same notation in our last reply to comment on the supplemental information, namely:

1. Traffic Congestion
2. Noise Impact
3. Safety Impact
4. Worsen Light and Air Quality
5. Negative Visual Impact
6. Health Impact
7. Excessively Long Development Period and financial viability
8. Mature Trees Preservation

We maintain our stance that this application for expansion of population to the site is materially inconsistent with the planning intentions of the Outline Zoning Proposal ("OZP") for the Stubbs Road area in question, i.e. to avoid adverse traffic congestion, preserve the mid-rise and mid-density character of the neighborhood, and protect against negative visual impact. Approval of which will subject the application to risk in judicial review and other remedies aimed at making this proposal more reasonable to the neighborhood and in line with the public interest.

Traffic Congestion

a. Result from the assessment

In this supplementary information, the Traffic Review Report (TRR) (attachment IV) is updated using latest indices (TPEDM & AADT) and as a result of that, traffic saturation at the roundabout of upper Stubbs/Tai Hang /Wong Nai Chung Gap roads drops from 0.83 to 0.76, a healthier traffic projection at the year 2038 compare with last TRR done in November 2019. (1.00 is fully saturated). Either 0.83 or 0.76 indicate the traffic at the roundabout is pretty closed to saturation.

This 2016 based data TPEDM (Territorial Population & Employment Data matrix) adopted in this revised TRR was preamble (at its general note #3) for a different assumption on future population and employment structure, economic growth and had not catered for the effect of Hong Kong 2030+, and it was due these changes that led to the change of the saturation figure.

Despite we rely on scientific basis in the projection for the traffic at 2038 based on warranted assumption, but assumption carries uncertainty, it would be also prudent that contingency measures be implemented to cover for the fluctuations when the result approached its upper limit. Our concerns is also echoed by Transport Department in their queries (see # 6 query to Attachment I).

b. Carpark provision

We excerpted the figures from Table 3 of the TRR for the number of car parking spaces

231 beds and consultation rooms	HKPSG's Requirement (planning guideline)	Proposed Provision	Location of carpark
Car Parking Spaces	85-175	175	G/F to 5/F
Lay-by taxi/private car	2-65	3	G/F
Other ambulance or disable spaces/layby's	Varies	13	G/F to 5/F
Notes for design requirement:			
- 1 car parking space per 3 to 12 beds and 1 to 1.5 space per consultation room.			
Lower limit = $20 \div 65 = 85$ ($231 \div 12 = 20$; $65 \times 1 = 65$);			
Upper limit = $77 \div 98 = 175$ ($231 \div 3 = 77$; $65 \times 1.5 = 98$)			
- 1 lay-by per 160 beds or part thereof and 0 to 1 layby per consultation room			
Lower limit = $2 \div 0 = 2$ ($231 \div 160 = 1.44 \rightarrow 2$, $65 \times 0 = 0$);			
Upper limit = $2 \div 65 = 67$ ($231 \div 160 = 1.44 \rightarrow 2$, $65 \times 1 = 65$)			

It is noted that carparking spaces (total 175 parking) are pushed to its upper limit while layby's for car/taxi (total 3 spaces) is closed to its lower limit. And these carparks take up the first 5 storey of both block 1 and 2 of the re-development to a different extent.

This distribution of spaces leaving only 3 layby's for drop off might create long queue for passengers from private cars and taxi waiting to get off. At peak hours this queue might backflow to the Hospital entrance which is just 20m from the aforementioned roundabout and create bottleneck over there.

c. Previous Concerns

We last pointed out our following concerns and these were either not addressed to in the Hospital reply or left to the control of relevant government department (response #4 to attachment II):

- on collection methodology (not addressed to);
- number of beds for existing hospital (whether it should be 120 beds vs 135 beds) that formed the baseline for manual survey (not verified);
- Heavy Commuter traffic from workers, lorries, truck during construction period; (leave it to the control from government administration)
- road diversion to facilitate construction activities and utilities works (not addressed to).

We believe the current building design may need to be reviewed to facilitate traffic flow; the traffic study has to be more practicable and cover traffic during construction period and there should be contingency measures to cater for uncertainty.

Noise Impact

There is no revised Geotechnical Review attached in the supplementary information but the position of the blocks from architectural layout (Attachment III) suggests to us the footprint of foundation is to remain unchanged. I.e. the main block will be constructed directly abutting the site boundary and the heavy noise and vibration are inevitable.

Nevertheless, there is commitment now from The Hospital to carrying out works inside noise enclosure (response #17 to attachment II).

This should be record as a condition for approval if The Hospital Application is to proceed.

Safety Impact

We reiterate our concerns on the safety of the slope and the financial burden so associated with the maintenance of the slope over the redevelopment of the Hospital. In the supplementary information, the safety aspect was left to the disposal of relevant government departments at subsequent stage (response #14 to attachment I) and there was no address to the financial aspect.

We have righteously registered our concerns with responsible grounds and the reply which stemmed out from engineering point of view from the Hospital own perspective appears to us evasive. We enjoy our stays at our own building complex, we take no benefit from the redevelopment of the hospital but we are disturbed, our estates are susceptible to damage and we are financially exposed. Instead of getting assurance from the beneficiary of the redevelopment, our well beings are handed over to the administrative arm of government departments. We do not think it is a responsible act from the Hospital.

We reiterate the Application should come with sufficient assurance and commitment from The Hospital that safety to its neighborhood will not be compromised.

Worsen Light and Air Quality

The Hospital applies for relaxation of building height in accordance with the provision of outline zoning plan and under paragraph 7.4 of the explanatory statement, the relevant criteria in the consideration for the application includes sufficient separation between buildings to enhance air and visual permeability (clause d) and improvement to amenity of the locality (clause f).

Hardly can we see from the redevelopment the above criteria are met. The redevelopment has 2 bulkier masses replacing the existing staff quarters and main block. The height and overall area are increased by about 40% to 50%. Air circulation, visual permeability and light penetration to neighborhood are unavoidably worsened. Green terrace to inside the hospital premises is internal facilities meant for patient and visitors and not for the benefit of locality.

It is proposed that the building design to further comply with the standard of Sustainable Building Design Guidelines (response #16 to attachment II) but this is going completely off the tangent. As the relevant criteria calls for enhancement and improvement, the design thus should benchmark to the current living environment of neighbors, i.e. to at least maintain the status quo, than to follow the out-of-context Guideline that suits for new buildings.

Please provide us with an environment assessment of the air flow and light impact to neighborhood arising from the new massing of new blocks.

Negative Visual Impact

The Hospital is sited at an elevated platform of 144mPD to which 2 buildings, heights 166mPD and 188mPD are built at street side and hill side respectively this also forms the basis of the current height restriction (165mPD and 190mPD respectively). Under the outline zoning plan, the site is restricted to these maximum heights to maintain the medium rise character of the local setting and preserve the visual access to the natural mountain backdrop (paragraph 8.4.6 of explanatory statement).

All reference of character and visual access should be at the perspective of the local setting which is the neighborhood to the Hospital. The medium rise character as represented by plot ratios to surrounding is 3 or the existing buildings' heights. The Hospital application for a plot ratio of 5.59 thus appears high and is in violation with paragraph 8.4.8 of the explanatory statement where it said "... scale and intensity of the development on the G/C sites would be compatible to those of the surround developments to maintain the existing low-rise character of the Area."

The mountain backdrop referred to at the explanatory statement is Mount Nicholson (over 400mPD high), the visual access called for should also be at the viewpoint of neighborhoods. Photomontages from the Racecourse, Jardine look-out, Black's Link or from the peak (response #18) are therefore irrelevant. These photomontages should instead be taken from Woodland Heights Block A or Bellevue Block C to be fair before decision on the application be made.

Given the level of the elevated platform (144mPD) and the heights limit (190mPD), the maximum height allowable for building is 46m (190mPD - 144mPD = 46m). This application for height relaxation is 64m (208mPD - 190mPD = 64m), being 18m higher than the height limit (or 40% higher), which should not be considered as minor. And for this reason, photomontages from neighborhoods are important.

This concern has been raised in February but has not been addressed to in this supplementary information.

The Visual Impact Assessment should be more comprehensive to factor Woodland Heights into consideration.

Health Impact

WHO standard and other local hospital standards are to follow during the operation (response # 15) and we do not have the knowledge to comment on that. We reiterate that hygiene and pollution are of particular concern to us especially to the elderly who spend most of their days at home.

Excessively Long Development Period

Again under the outline zoning plan, the site for the Hospital is zoned G/JC and is intended primarily for the provision of facilities serving the needs of the local resident or a wider district (paragraph 8.4.1 of the explanatory statement). As elaborated in our previous concerns, there are spare capacities in the hospital networks nearby, what is then the justification in the context of public interest for the relaxation in building heights and hence the expansion in the hospital capacities and hence the inconvenience to neighborhoods over the lengthy construction period.

Mature Trees Preservation

We have no further comment on this.

Conclusion

The Hospital may be able to justify the redevelopment with every good reasons but it fails to justify for the scale of redevelopment. It appears to us that there are excessive car parking provision and the building mass appears far too large to be necessary. Because of the volume of expansion, the building has to build against site boundary and create issues of noise nuisance, poor air ventilation, light and view impermeability to neighbors and inconvenience from lengthy construction period. Besides, the extra population stretches the capacity of nearby junction and the rings of road (Upper and lower Stubbs Road, Tai Hang Road and Wong Nai Chung Gap Road). Among them, Stubbs road has been identified as the primary distributor road that links the district with the urban area. (Paragraph 9.1 of the explanatory statement)

We urge the Hospital to review the real needs and building design, build to the right scale to save more. Some spaces, e.g. mechanical plant rooms and carparks, may go underground and Clinics and other above ground hospital spaces be reshuffled, such that the building bulk can be reduced and go within the height limit and build fast and away from site boundary.

The above are our response to the supplementary information and may not be exhaustive. Please put these concerns and objections on record, and we would appreciate your response. Should you have any queries, please do not hesitate to contact us.

Yours faithfully,

For and on behalf of

Incorporated Owners of Woodland Heights (Wong Nai Chung Gap Road)

P.P. 
Kevin Lo, Chairman

Douglas Van, Vice Chairman

Carl Lu, Secretary

Cc: Mr Ivan Wong, Councilor, Wan Chai District Council



The Incorporated Owners of Villa Monte Rosa

41A, STUBBS ROAD, HONG KONG.
TELEPHONE: 2575 8524, 2572 8826
FAX NO. 2581 9707

玫瑰新業主立案法團
電話：二五七五八五二四
二五七二八八二六
二五八二五七二六
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Our Ref: (027) in VMR (confid)2020

Date: 9th July, 2020

The Secretary of the Town Planning Board
15th Floor, North Point Government Offices
333 Java Road,
North Point,
Hong Kong

Dear Sirs,

Re: Comments on the Supplementary Information of Planning Application (No. A/H14/82)
Proposed Minor Relaxation of Building Height Restriction for
Permitted Hospital Use at 40 Stubbs Road, Hong Kong

We refer to the supplementary information of planning application (No. A/H14/82) submitted by the applicant on 12th June 2020 regarding the proposed relaxation of building height restriction for Hong Kong Adventist Hospital ("HKAH") at 40 Stubbs Road. On behalf of the residents of the 240 units in Villa Monte Rosa ("VMR"), 41A Stubbs Road, we strongly object to the application and have the following comments:-

1. Response to Comments from Government Departments

1.1 On Transport Department's comments, item 4, Traffic Count Survey, the applicant put forward reference hospitals with similar number of beds to justify the count. The applicant could not do counting because of COVID-19, and simply used their in-house data. Also, the hospitals the applicant quoted are big public ones like North District, Princess Margaret and TKO hospitals. They are district wide hospitals for general public, mostly relying on public transportation, whereas Adventists is a much smaller scale private and high charging one intended for a different group as well as the immediate neighborhood.

1.2 On Transport Department's comments, item 6, Junction Capacity Performance, the applicant's response on proposing a design flow/capacity ratio of 0.76 in year 2038 should not be accepted. This figure represents a traffic volume/congestion with slow moving bumper to bumper traffic on an average hour. It will be far worse on rush hours

and special event days for schools. The current roundabout traffic is already barely bearable. We should bear in mind this is a low density and quiet residential neighborhood. Such congested traffic situation will not be in line from planning perspective.

1.3 This goes back to the applicant's provision of car parking numbers. As their proposed numbers relate directly to beds and consultation rooms, the figures and provisions should be scrutinized in details for proper approval.

2. Schematic Architectural Drawings of the Revised Scheme

2.1 Drawing 5561-S16-001, to be read together with Figure 2 of ADI's Tree Survey Report.

In ADI's Visual Impact Assessment, Figure Y4.1, the main Landscaped Garden is at similar level (around 142.8 MPD) as the top of existing tall berm to its south which is outside lot boundary abutting Stubbs Road.

However, in Figure 2, Landscape Section A-A of ADI's Tree Survey Report, the garden is shown starting from Stubbs Road at 126.0 MPD with gradual z-zag ramp up to level 144.2 MPD.

This discrepancy should be clarified.

2.2 The above Landscape Garden seems to be hiding behind an old berm. The scheme should address how to retain the berm to the satisfaction of Highways or Geotechnical Department as this berm is crucial to the facade along the site's entire width. It is not clear as which party, the applicant, or Highways will be maintaining the berm, which is outside the applicant's lot.

If improvement work is required, or ultimately taken down on stability or cost reason, the entire front facade, and its natural stone face treatment (harmonious along whole roundabout area) facing Stubbs Road will be very different and impactful to the neighborhood.

If such berm's maintenance responsibility falls on the applicant, there should be a requirement for the applicant to maintain the berm's current condition. Town Planning Board, even if considering the case, should ask the applicant to address this berm as S.16 application is scheme specific.



2.3 In the same Figure V4.1 of Visual Impact Assessment, the proposed relaxation of building height (bottom photo) clearly shows its incompatibility with all its neighboring buildings as well as blocking the natural mountain ridgeline at its south. Relaxation should absolutely not be granted. No precedence case should be set.

2.4 In DWG 5561-S16-P-010 section, all car parks are shown above ground and should all be accounted for 50% of GFA if within HKPSG. This should be checked and verified for actual Plot Ratio and total GFA, and for true comparison against other developments in the area.

3. Traffic Review Report by HWSPPB

3.1 Paragraph 4.2, while 18 Stubbs Road development, which actually is completed, is included in the analysis, why No. 1 Stubbs Road, the redevelopment of AIA Building is not included? This AIA building will be an office building and will have more car parking requirement and generate more traffic for Stubbs Road.

3.2 The study has not addressed the potential backing up of vehicles onto Stubbs Road as it is a single ingress and egress, internal circular Right Of Way within the development with limited loading and picking space on G/F for all types of vehicles, plus likely drop bars and paid gates. The possible backing up may also affect the traffic at the big roundabout.

3.3 The impact on traffic congestion has not been addressed. The assumption and flow capacity of the original traffic design for Stubbs Road is not clearly specified in the report.

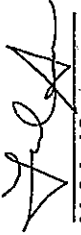
3.4 The impact of construction trucks during the extremely long construction period, i.e. 15 years until year 2035 is not taken into account in the traffic assessment. The impact of heavy traffic flow during the construction period is underestimated.

Finally, the time period allotted for comments to be submitted by the public is an unreasonably short period for the affected parties to respond to a massive redevelopment project that has serious implications for all nearby residents. We ask that you extend the consultation period and require the applicant to respond to the omitted questions and comments from the various Government Departments and the nearby residents.

We look forward to your earliest response.

Should you have any queries, please contact our Estate Manager, Ms. Anna Lai at 2572-8836.

Yours faithfully,
For and on behalf of
The Incorporated Owners of Villa Monte Rosa


Mr. Leland Sun

致城市規劃委員會秘書：

專人送達或郵遞：香港北角渣華道 333 號北角政府合署 15 樓

傳真：2877 0245 或 2522 8426

電郵：tpbpd@pland.gov.hk

To : Secretary, Town Planning Board

By hand or post : 15/F, North Point Government Offices, 333 Java Road, North Point, Hong Kong

By Fax : 2877 0245 or 2522 8426

By e-mail : tpbpd@pland.gov.hk

有關的規劃申請編號 The application no. to which the comment relates

A/E14/82 Received on 12/06/2020

意見詳情 (如有需要，請另頁說明)

Details of the Comment (use separate sheet if necessary)

See Supplementary Sheet (Ref. 2) 9th July 2020 and
Cover letter attached

「提意見人」姓名/名稱 Name of person/company making this comment The Incorporated Owners of Bellevue Court Bk. A, B & C

簽署 Signature Walter Wai 日期 Date 9-July 2020

For and on behalf of

The Incorporated Owners of Block C,
Belvue Court

THE INCORPORATED OWNERS
OF BELLEVUE COURT, B.L.K.

THE INCORPORATED OWNERS OF BELLEVUE COURT BLOCK A

Walter Wai
Authorized Signature

For and on behalf of

THE INCORPORATED OWNERS OF BELLEVUE COURT BLOCK A

Walter Wai
Authorized Signature

The Incorporated Owners of Bellevue Court Block A, B & C
c/o Management Office, 6 Floor, Block B, Bellevue Court, 41, Stubbs Road, Hong Kong

9 July 2020

Secretary

Town Planning Board

15th Floor North Point Government Office

333 Java Road, North Point

Hong Kong

Dear Sir/Madam

Re: Objection to HK Adventist Hospital's application to relax height restriction by application no: A/H14/82 - Submission of further information by Applicant - May 2020

We refer to your letter (ref: TPB/A/H14/82) dated 19 June 2020, addressed to the Incorporated Owners of Bellevue Court Block A, B & C and their residents.

We enclose herewith our latest comments and grounds of objection jointly by our 3 respective Incorporated Owners based on the additional information and revised drawings Figure 3.1 and Figure V3.1 to V3.10, submitted by Adventist Hospital (AH), the applicant.

Please be reminded that we have already submitted our objection statement to your Department and the Town Planning Board on 8th February 2020, which was based on AH's previous submission documents. This current revised objection letter is based on the information you sent us on 19 June 2020.

All our reasons of objection are self-explanatory and are to be presented to your on-coming TP Board meeting on the latest hospital application mentioned above.

Yours sincerely

For & on behalf of

the Incorporated Owners of Bellevue Court Blocks A, B & C

For and on behalf of

The Incorporated Owners of Block C,
Belvue Court

THE INCORPORATED OWNERS
OF BELLEVUE COURT, B.L.K.

THE INCORPORATED OWNERS OF BELLEVUE COURT BLOCK A

Walter Wai
Authorized Signature

Walter Wai
Authorized Signature

Supplementary Sheet (Rev. 2) 5th July 2020

To: the Planning Department, North Point Government Offices, 333 Java Rd., Hong Kong

Objection of Adventist Hospital's application for Minor Relaxation of Building Height Relaxation for Permitted Hospital Use, 40 Stubbs Road, Hong Kong [Planning Application A/H14/82] - with submission of further information by applicant, May 2020.

Details of Comments / Objection submitted by The Incorporated Owners of Bellevue Court Block A, B & C, (Supplementary Sheet)

We refer to the above Planning Application (A/H14/82) and subsequent submission of further information by the applicant in June 2020. We also refer to our previous objection letters dated 8th February 2020 and 23 May 2020.

Regarding your respective letters to our Incorporated Owners of Bellevue Court Block A, B and C dated the 19th June 2020, we would like to reiterate our concerns and objection to Adventist Hospital's (AH) application for Building Height Relaxation and its resulting over-development of the hospital.

AH over-sized development and traffic generated would create an adverse and detrimental impact on the original planning intention and the mid-density and mid-rise character of the neighbourhood, traffic over-loading on Stubbs Road, Blue Pool Road and Tai Hang Road, as well as negative environmental impacts including potential noise and dust nuisance caused by the unreasonably long redevelopment time-line proposed by AH.

Our detailed grounds of our objection are as follows:

1. Adventist Hospital's proposed Plot Ratio, Height Restrictions, Site Coverage & Car Park

1.0 Key data of AH's proposed redevelopment scheme are as follows:

- 1.0.1 AH's newly revised proposal of June 2020 submitted to the Town Planning comprises of 2 blocks (Block 1 and 2) instead of 3 blocks in the previous February scheme. A & B blocks as proposed in the Jan 2020 submission have been combined into Block 1 in the latest (May 2020) plan, and previous Block C is now Block 2.
- 1.0.2 AH has applied for Planning Permission to relax the existing OZP compliance height restriction (190.518m above PD) by 22.4m, when measured to the proposed Block 1 plant room at 212.918m PD; and, 17.65m measured from the Block 1 roof level at 208.168m PD.
- 1.0.3 In AH's May 2020 scheme, proposed height of Block 2 is 176m PD to Green roof level and 171.3 PD to main roof level. The OZP compliance height for this block is 165m PD and therefore the height relaxation applied is 11m for their upper roof level and 6.3m for their main roof level.

1.0.4 Proposed Plot ratio of 5.59 [same as Jan 2020 proposal]

1.0.5 Site Coverage of 55.03% [same as Jan 2020 proposal]

1.0.6 A total number of car parking spaces for 184 cars park + 7 lay-bys for loading/unloading of taxis, ambulances, light buses etc. [same as Jan 2020 proposal]

1.0.7 Different from the Jan 2020 scheme, demarcation 1. In the drawing of the new June 2020 Landscape Proposal (Figure 1), shows that the existing retaining wall to the south (left hand side) of the entrance from Stubbs Road is to retained and maintained. The drawing also shows that only a small number of existing trees outside AH retaining wall boundary on Stubbs road will be preserved.

1.0.8 This demarked tree preservation area does not seem to cover the existing mature trees located inside the retaining wall to the south of the car entrance within the AH boundary, nor the existing mature trees that are currently located on the north (right side) of the entrance. (see photo plate A below)

1.0.9 The location of proposed new Lift tower and Terraced Garden (demarcation 1 & 3 on on Figure 1.1) behind the existing retaining wall on south side of the car entrance as well as the Courtyard Garden (demarcation 2 on Figure 1.1) on the north side of the car entrance would necessitate the felling of most of the existing mature trees in the two areas.

1.1 Bellevue Court's 2003 Objection to the Outline Zoning Plan (OZP) No. S/H14/6

Historical background & previous Planning Decisions made by the TPB

1.1.1 In 2003, Town Planning Department's Peak Area OZP imposed an "Existing Bulk" restriction of plot ratio (i.e. future redevelopment to be no more than what is existing in a development) and upper limit of building heights to "existing building heights" to all 7 numbers of R(8) sites along Wong Nai Chung Gap Road and Upper Stubbs Road in the neighbourhood. Bellevue Court was one of the sites affected.

1.1.2 Individual owners and the Incorporated Owners Bellevue Court, alongside with other site owners in the neighbourhood submitted objections of the draft OZP to the Town Planning Board.

1.1.3 Bellevue Court's reasons for their objection were that majority of the restricted sites in the area were over 40 to 50 years old and were due for redevelopment. The newly imposed Height and Plot Ratio restrictions would practically dampen any future potential developer's interest and incentive in redeveloping the sites affected by the OZP.

1.1.4 Furthermore, owners of Bellevue Court argued that it was inequitable for the government to have allowed 2 towers at 41C and 41D Stubbs Road to build to high plot ratios (to 5 and 8 respectively) and to excessively tall heights of 67 & 69 storeys (likewise, Nicholson Tower, was also permitted in the past to build up 30 storeys and to a plot ratio of 5.1), and then afterwards harshly restricted Plot Ratio of the remaining 7 sites to existing bulk and heights.

1.2 Rejection of Bellevue Court's owners objection by the Town Planning Board (TPB)

1.2.1 After a meeting held on the 14th March 2008, The Town Planning Board rejected Bellevue Court's and various neighbourhood owners' objections, stating the following grounds in their reply letters (See Attachment A –letter from Town Planning Board to the Incorporated Owners of Bellevue Court Block A – Ref. TPB/05/H14/6-3-)

1.2.2 The two "super-tall" towers at 41C and 41D Stubbs Road were incompatible with the pre-dominant medium density and medium-rise development character of the area.

1.2.3 TPB explained that the restrictions of Plot Ratio and Heights (to existing bulk) on the R(B)1 zone sites (including Bellevue Court) were to "maintain this existing pre-dominant character of the area", and to "preserve public views" and to "protect the ridge line" (behind the buildings)

1.2.4 The plot ratio restriction is "to avoid overtaxing the local road system". Increase development intensity in the uphill area "would adversely affect the traffic in the downhill area".

1.2.5 Development restrictions stipulated in the OZP is "to reflect the planning intention of the area".

1.2.6 Proposed Rezoning (by Bellevue Court and other objectors proposed an alternative higher plot ratio and height limit) would create an undesirable precedent. The cumulative effect of approving similar rezoning would result in adverse traffic impact and would change the medium rise, medium density character of the area.

1.2.7 In summary, the Planning Intentions behind the Outline Zoning Planning as endorsed by the Town Planning Board's meeting and subsequent hearing, can be clearly summarised as follows:

1.2.7.1 The super-tall developments of the Summit & Highcliff (41C and 41D Stubbs Road respectively) and by implication should include also the 30 storey towers of Nicholson Tower are considered incompatible with development character of the area.

1.2.7.2 Development restrictions (of Plot Ratios and Heights) stipulated in the OZP is to reflect the planning intention of the area, which is to maintain the pre-dominant medium density and medium-rise character of the area, to preserve public view and to protect the ridge line (of the hill behind)

1.2.7.3 The OZP plot ratio restrictions is also to avoid overtaxing the local road system. Increase in development intensity would adversely affect the traffic downhill from the subject area.

1.3 Development details of the existing sites in the neighbourhood

Sites	Ex. Plot Ratio	Ex. Height (storeys)
41 Stubbs Rd (Bellevue Court)	3.8	13s & 14s
41D Stubbs Rd * (Highcliff)	8.0 *	69s
41C Stubbs Rd* (The Summit)	5.0 *	67s
41A Stubbs Rd (Villa Monte Rosa)	3.0	21s & 22s
43 Stubbs Rd (Evergreen Villa)	3.0	18s, 20s, 21s
43A Stubbs Rd (Victoria Heights)	3.0	24s
2 Wong Nai Chung Gap Rd (Woodland Heights)	2.6	16s
4A-D Wong Nai Chung Gap Rd (Valley View)	1.7	9s
5-10 Wong Nai Chung Gap Rd** (Nicholson Tower)	5.1**	30s
12-14 Wong Nai Chung Gap Rd (Leon Court)	3.1	12s

* Town Planning Board considered Plot Ratio excessive and incompatible with neighbourhood's medium density, mid-rise character.

** This should also be considered incompatible with neighbourhood character as it is 30 storeys tall

2.0 Detail grounds behind Bellevue Court's Objections

2.1 Objection to AH's application for Relaxation of Height Restrictions

AH's current Planning application is to ask the TPB for permission to relax the OZP height restriction from 190.518 m PD to 212.918 PD (22.4m higher) on their redevelopment plan, adding some 5 storeys of hospital floors above the existing height limit. This is equivalent to 6 to 7 storeys of a domestic buildings.

Bellevue Court, immediate neighbour AH's site on the north, is subject to OZP height restriction to its existing height of 189.42 m PD (measured to highest roof level). AH application to relax and increase their height restriction, if approved, shall be 23.45m above the maximum height of Bellevue Court, meaning that AH height would be about 7 domestic storeys higher than Bellevue Court.

Woodland Height, neighbour to AH's south boundary, is also subject to OZP height restriction. According to AH's planning application document, it has an existing max. height restriction of 193m PD. Consequently, AH's proposed new height of 212.918 m PD will be 17.918m higher than Woodland Height, which is equivalent to about 5.56 domestic storeys higher than Woodland Heights. In other words, AH's application to relax the OZP height restriction compliance would result in its redevelopment protruding dominantly above its neighbouring development.

The plot ratio of 5.59 and a site coverage of 56.03% have contributed to the excessive bulk and height of Block 1 of the proposed hospital. In view of the OZP's original planning intention of maintaining mid-rise, medium density character of the neighbourhood, as well as the potential severe traffic concern mentioned in section 1.2.7.1 to 1.2.7.3 above, the application to relax AH's height restriction is too excessive and should not be approved.

2.2 Excessive Plot Ratio

It should be noted that the lifting of AH's height restriction not only would result in their new development protruding above its two neighbour buildings, it would indirectly result in enabling AH's scheme to achieve a plot ratio of 5.59 for their development.

Referring to Table 1.3 above, apart from the 2 tall towers of Highcliff (plot ratios of 8 with 69 storeys) and The Summit (plot ratio 5 with 67 storeys), as well as Nicholson Tower (plot ratio 5.1 of 30 storeys), the majority of the plot ratio restrictions of the remaining residential buildings sites along the neighbouring stretch of Stubbs Road and Wong Nai Chung Gap Road ranges from 1.7 to 3.8, with an average of 2.89.

This high plot ratio, together with the extra height and site coverage discussed below, will collectively contributed to the visual bulk of the hospital building if approved. (see application document: figure V3.3/- viewpoint C). AH's proposed plot ratio of 5.59 is double the average in the area and therefore too excessive for the area. Considering that the original planning intention of the OZP is to maintain the mid-rise and mid-density character of the neighbourhood, AH's scheme is clearly contradicting the OZP planning intention. The scheme should not be approved unless we see a reduction of its plot ratio, height and site coverage compatible with other sites in the area.

2.3

Excessive Site Coverage

In the AH planning application document, there is no data provided for comparison of site coverage of various buildings in the neighbourhood. Bellevue Court is an example of typical development built in the area in the 1960s. We therefore use Bellevue Court's site coverage to compare with the site coverage of the AH proposal. The site coverage in the AH scheme is 56.03%, while the Bellevue Court existing site coverage is 27.5%, about half of AH's proposal.

This high site coverage is one of the contributory reasons for why AH's redevelopment is looking so visually dense and bulky, and why its upper Block 1 had to be built up to its edge boundaries, as well as the car park building fronting Stubbs being so tall and bulky in size. (see figure 1.1 and V3.6- viewpoint C).

We therefore conclude that AH's coverage is way too excessive in relation to the site coverage of the neighbouring development and therefore must be reduced.

2.4 Excessive Car Park Provisions

The proposed provision of 184 carparks and 7 loading bays in the proposal is also excessive. The additional car parks and loading bays would result in increase in traffic loading in the neighbourhood road system. Lower Stubbs Road, Blue Pool Road and Tai Hang Roads are already very congested at peak used and rush hour time. The excessive provision of 184 car parks and 7 loading bays for service vehicles not only contributes to bulk and density of the development, it also contradicts the Town Planning Board's traffic concerns and the OZP planning intention for the area. (see sections 1.2.4 and 1.2.7.3 above)

Excessive traffic impact was one of the major reasons for the rejection of the previous neighbouring sites' applications to relax the plot ratio and height restriction stipulated by the OZP in 2003. We therefore conclude that the number of carparking and loading bay is far too excessive and the TPB should not approved such number.

2.5 Undesirable Visual Impact of the redevelopment on the neighbourhood environment character

Despite the proposed new scheme of May 2020, the street fronting lift tower, the wide elevation of Block 2, as well as the fully stretched elevation of Block 1 across the entire width of the site, visually present a harsh looking bulk of building fronting Stubbs Road and the neighbourhood. This is especially obvious when we compare the new scheme with the existing round shape of the existing building. For the benefit of the environment and preserving the character of the neighbourhood AH should also consider conserving and interior and refurbished the existing building instead of demolition and rebuild. (see figure 1 and V3.6/- photomontage viewpoint C)

Futhermore, the proposed free standing Lift Tower located at the edge of Stubbs Road in front of Block 2 is a visually dominant and not in character with the visual context of the neighbourhood.

2.6 Preservation of the mature trees on site should be fully considered in drawing Different from the Jan 2020 scheme, demarcation 1. In the drawing of the new June 2020 Landscape Proposal (Figure 1), shows that the existing retaining wall to the south (left hand side) of the entrance from Stubbs Road is to be retained and maintained. The drawing also shows that only a small number of existing trees outside AH retaining wall boundary on Stubbs road will be preserved.

This demarked tree preservation area does not seem to cover the existing mature trees located inside the retaining wall to the south of the car entrance within the AH boundary, nor the existing mature trees that are currently located on the north (right side) of the entrance. (see photo plate A below)

The location of proposed new Lift tower and Terraced Garden (demarcation 1 & 3 on on Figure 1.1) behind the existing retaining wall on south side of the car entrance as well as the Courtyard Garden (demarcation 2 on Figure 1.1) on the north side of the car entrance would necessitate the felling of most of the existing mature trees in the two areas.

We are of the opinion that felling of these trees would be highly unacceptable in the interest of environmental protection and tree preservation. As the scheme shows insufficient sensitivity and respect to the existing mature trees and the environment, we object to the entrance area design of AH redevelopment plan.



2.1.7 The unreasonably long construction programme

The 3 phase long project programme stretching over 15 years in 3 phases for a private redevelopment of its scale is unacceptable to its neighbours.

The pro-longed redevelopment programme would post an unnecessary long period of disturbances to the area in terms of nuisance cause by construction noise, dirt and dust pollutions, potential crime and security issues, as well as traffic delays caused by truck deliveries and utility connection works etc.

We are not sure of the reason behind this abnormally long redevelopment programme (15 years in 3 phases) and there is no clear and detailed account of how the development will be physically phased, nor to what extent existing hospital services would be disrupted or suspended during the construction period.

We are not certain why AH needs such an abnormally long redevelopment time and phasing programme. Whether it is due to reasons such as the complexity of keeping existing hospital services in operation, or technical complexity in implementing the construction work, or due to financial constraints and cash-flow needed to finance the huge cost of site formation and building on their back slope, it all points to the possibility that AH's complex redevelopment is oversized and over-ambitious.

In any case, the proposal is insensitive to the site's inherent character and constraints and it contravenes the planning intention of the Outline Zoning Plan of the area.

2.2. Is Adventist Hospital redevelopment plan fully benefit the community at large?

The AH stated that the redevelopment would increase 70% more beds provision to meet the needs of the community.

However, there is no objectively-proven evidence that such demand is so large that it renders for the Town Planning Board to approve the relaxation of OZP height restriction which would result in endorsing such a high density of development in the area.

The reasons for our questioning of the over-size, over-ambitious nature of the AH redevelopment proposal is as follows:

2.2.1 Adventist Hospital is high quality but very expensive private hospital, affordable by and benefiting only high-net worth individuals and executives of large companies in the community, and not the general public at large.

2.2.2 The proximity of site location on Hong Kong Island is not short of private hospitals. Examples are:

- A Gleneagles Hospital at lower Nam Fung Road (500 beds)
- B St. Paul's Hospital, with its recently built extension at the bottom of Tai Hang Road (400 beds)
- C HK Sanatorium & Hospital in Happy Valley (480 beds)

In addition, there are also the old private Matilda Hospital at the Peak and Caritas Canossa Hospital in Old Peak Road Central.

2.2.3 In view of the above and the undesirability of AH's over-size proposal, we strongly recommend that AH's project should be cut back to a more reasonable size with plot ratio, site coverage and heights (not to exceed the OZP height) that can commensurate and enhance the character and suburban quality of the neighbourhood.

3.0 Conclusion

The Town Planning Department and Town Planning Board is requested to refrain from approving Adventist Hospital's height limit relaxation application for reasons below:

- 3.1 The development is excessive in Height, Plot Ratio and Site Coverage, resulting in an excessive building bulk, for reasons outlined in detail in Section 2.1 above.
- 3.2 The traffic generated by the additional car parking in the new development directly contradicts the very reason why height and plot ratio had to be restricted under the 2003 OZP. The carpark numbers are unacceptably too high.
- 3.3 AH's application report has not given due consideration to the development's visual impact and its respect of the character of the neighbourhood, and has no full proposal on how to conserve ALL the existing mature trees in the area.
- 3.4 The application has not demonstrated how it would mitigate the potential prolonged nuisance caused by the redevelopment process nor has it outlined how AH's medical operation and services are affected and organised during the phased construction work.
- 3.5 Adventist Hospital is supposed to be a NGO providing medical service to the community and should not be seen profiting from it. There are plenty of expensive private hospital capacities on Hong Kong Island. Given the context of the site, there is no sound reason for AH to redevelop to such an excessive manner.
- 3.6 Referring to the Town Planning Board's previous disapproval letter to Bellevue Court's application dated 28 March 2003 (reference TPB/O/S/H14/6-3), approving AH's application to relax height limit is inequitable to all owners in the nearby

neighbourhood, whose previous developmental potential had to be reduced, height restricted and sacrificed for the common purpose of conserving the 'mid density' and 'mid-rise' character of the neighbourhood, as well as to avoid over-taxing of traffic on the local road network.

If the Town Planning Board is to approve AH's current application to relax their OZP height restriction, it would create an undesirable precedent that destroy the integrity of the original planning intention, and potentially open up to challenge through Judicial Review in the future by owners in the neighbourhood.

For and on behalf of:

THE INCORPORATED OWNERS
OF BELLEVUE COURT BLOCK A

[Signature]
Authorized Signatory

The Incorporated Owners
of Bellevue Court Block A

Date: 8 February 2020

THE INCORPORATED OWNERS
OF BELLEVUE COURT BLOCK B

[Signature]
Authorized Signatory

The Incorporated Owners
of Bellevue Court Block B

THE INCORPORATED OWNERS
OF BELLEVUE COURT BLOCK C

[Signature]
Authorized Signatory

The Incorporated Owners
of Bellevue Court Block C

Attachment A (384)

城市規劃委員會

香港北角德輔道東三十三號
北角政府合署十五樓

TOWN PLANNING BOARD

15/F, North Point Government Offices
333 Java Road, North Point,
Hong Kong.

傳 真 FAC 2877 0245 07 2522 8426

電 話 TEL 2231 4810

來電請註明 Your References:

在回信時請註明此字樣

In reply please quote this ref: TPB/O/S/H/14/6-3

By Registered Post

28 March 2003

The Incorporated Owners of Bellevue Court Block A

Bellevue Court

41 Stubbs Road

Hong Kong

(Attn.: Ms. Wendy Lee)

Dear Sir/Madam,

Draft The Peak Area Outline Zoning Plan No. S/H/14/6
(Objection No. 3)

Pursuant to section 6(3) of the Town Planning Ordinance (the Ordinance), the Town Planning Board (TPB) gave preliminary consideration to your objection to the above Plan at its meeting on 14.3.2003 and decided not to propose any amendment to the above Plan to meet your objection and the reasons are :-

- (a) the two super-tall developments at 41C and 41D Stubbs Road are incompatible with the pre-dominant medium-density and medium-rise development character of the area. The plot ratio and building height restrictions of the "Residential (Group B)1" zone, which covers the objection sites, are to maintain this existing pre-dominant character of the area, to preserve public views and to protect the ridgeline;
- (b) the plot ratio restriction is to avoid overtaxing the local road system. Increase in the development intensity in the uphill area would adversely affect the traffic situation in the downhill area;
- (c) amendments to the Outline Zoning Plan (OZP) exhibited for public inspection is a form of public consultation. Any affected person can object to the amendments and their objections would be considered by the TPB in accordance with the Town Planning Ordinance;
- (d) development restrictions stipulated in the OZP is to reflect the planning intention of the area. Development right of both objection sites under the respective leases would not be affected by the OZP restrictions; and

- 2 -

- (e) the proposed rezoning would create an undesirable precedent, and the cumulative effect of approving similar rezoning would result in adverse traffic impact and would change the medium-rise, medium-density character of the area.

A copy of the TPB Paper for the preliminary consideration of your objection and the relevant extract of minutes of the TPB meeting held on 14.3.2003 are enclosed herewith for your reference.

Should you wish to withdraw your objection, please inform me in writing as soon as possible, preferably within 2 weeks of the date of this letter.

If your objection is not withdrawn, the TPB will further consider your objection under section 6(6) of the Ordinance. Objections No. 3 to 29 to the above Plan will be heard collectively together. You and/or your authorized representative(s) may attend and, if so desired, be heard at the meeting under section 6(6) of the Ordinance, which is to be held on Friday, 6 June 2003 in the Conference Room, 15th Floor, North Point Government Offices, 333 Java Road, North Point, Hong Kong.

Should you wish to submit any further written representations for the hearing of your objection, you are required to make such submission within 4 weeks of the date of this letter. If the written representations include voluminous technical reports, an Executive Summary of preferably not more than 400 words should be provided.

A copy of the paper prepared by the Planning Department for the hearing of your objection by the TPB will be forwarded to you at the above address 7 days before this meeting. A copy each of the Guidance Notes on section 6(6) hearing and Deferment of Consideration of Objections are also attached for your information.

To facilitate arrangement for the meeting, I should be grateful if you would advise me, within 2 weeks of the date of this letter, of the following :-

- (a) the name(s) of the person(s), if any, that will attend the meeting of the TPB; and
- (b) whether you require simultaneous interpretation service at the meeting.

If you wish to seek further clarifications/information on matters relating to the above decision, please feel free to contact Mr. C.S. Chan of Hong Kong District Planning Office at 2231 4935.

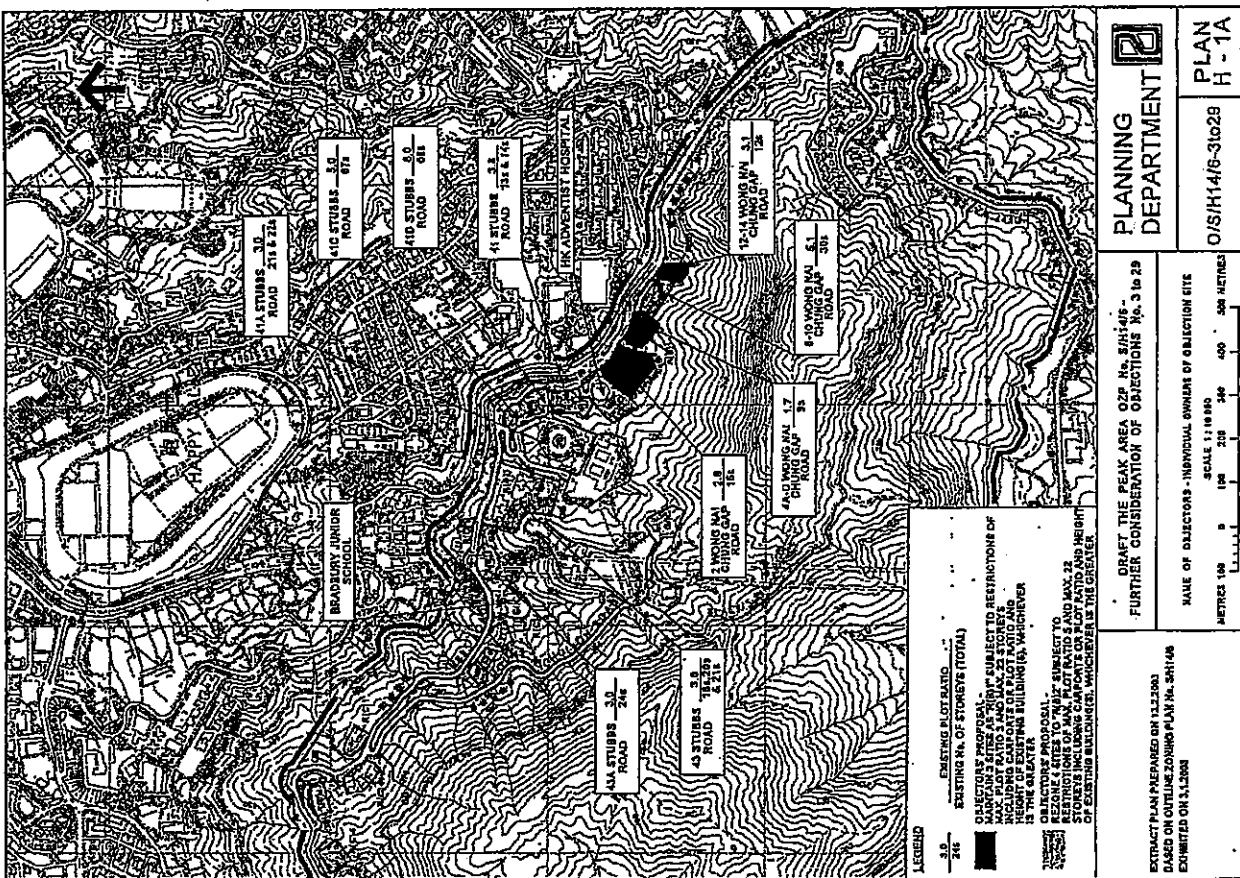
Yours sincerely,



(Mrs. Brenda KWOK)

for Secretary, Town Planning Board

BKAUJ/s



5-45

就規劃申請提出意見

Comments on Planning Application

請勿填寫此欄	檔案編號 Reference No.	A/H/14/12
For Official Use Only	收到日期 Date Received	06/05/2020

重要提示:

Important Notes:

- (1) 意見必須於指定的法定期限內向城市規劃委員會 (委員會) 提出; the comment should be made to the Town Planning Board (the Board) before the expiry of the specified statutory period;
- (2) 委員會考慮申請的法定日期已上載於委員會的網頁(www.info.gov.hk/tb/), 考慮規劃申請而舉行的會議(進行相關的部分除外), 會向公眾開放。如欲觀看會議, 請親臨在會議日期的一天前以電話(2331 5061)、傳真(2877 0245或2522 8426)或電郵(tppbd@pland.gov.hk)向委員會秘書處預留座位。座位會按先到先得的原則分配; the tentative date of the Board to consider the application has been uploaded to the Board's website (www.info.gov.hk/tb/). The meeting for considering planning applications, except the deliberation parts, will be open to the public. For observation of the meeting, reservation of seat can be made with the Secretariat of the Board by telephone (2331 5061), fax (2877 0245 or 2522 8426) or e-mail (tppbd@pland.gov.hk) at least one day before the meeting. Seats will be allocated on a first-come-first-served basis;
- (3) 供委員會在考慮申請時參閱的文件, 會在送給委員會後存放於規劃署的規劃資料庫內(查詢熱線 2231 5000), 以及在會議當日存放於會議室, 以供公眾查閱; 及 the paper for consideration of the Board in relation to the application will be available for public inspection after issue to the Board Members at the Planning Enquiry Counters of the Planning Department (Hotline: 2231 5000) and at the Public Viewing Room on the day of meeting; and
- (4) 在委員會考慮申請後, 可致電2331 4810或2331 4835查詢有關決定, 或是在會議結束後, 在委員會的網頁上查詢決定結果。 after the Board has considered the application, enquiry about the decision may be made at tel. no. 2231 4810 or 2231 4835 or the gist of the decision can be viewed at the Board's website after the meeting.

#1/4

-1-

致城市規劃委員會秘書：

本人送遞或郵遞：香港北角渣甸道333號北角政府合署15樓

傳真：2877 0245 或 2522 8426

電郵：tpbpd@pland.gov.hk

To : Secretary, Town Planning Board

By hand or post : 15/F, North Point Government Offices, 333 Java Road, North Point, Hong Kong

By Fax : 2877 0245 or 2522 8426

By e-mail : tpbpd@pland.gov.hk

有關的規劃申請編號 The application no. to which the comment relates

AJ/H14/82 Received on 06/05/2020

意見詳情 (如有需要，請另頁說明)

Details of the Comment (use separate sheet if necessary)

詳情請看附件

「提意見人」姓名/名稱 Name of person/company making this comment

簽署 Signature

日期 Date

10/7/2020

黃宏泰

反對此申請

1. 此申請之前未和醫院溝通的屋頂作任何深入溝通，沒有維持社區和諧。提出之交通環境評估報告粗糙，未能顧及灣仔半山現今及未來十年，交通日見繁忙擁擠之實際問題。

2. 醫院重建之部分設施是不必要地放在申請內，故此搬出之不必要空間可令到樓宇之高度不帶申請那麼高，高度限制申請放寬是絕對沒有需要的。

3. 整個重建計劃需時15年，完全不合常理及周圍對週邊生活環境之長期影響。特別是對附近學校造成之噪音影響，未有交待，實屬有點自私之構思，對週邊居民寧靜生活環境加置之不理。對病人在建築期內之照顧到今天還未有一套解決方案，未盡醫院應有之基本責任。一意孤行對社區和諧構成十分壞之影響先例，另此申請全面推遲規劃署多年前對此區實施之高度限制，否定規劃署年前決定，在沒有具體合理情況下，任意再處提高申請。

4. 多年前之構思，港安醫院只是作為小型社區醫院，其選址及面積並非適合大型綜合醫院，現有規模以是超出原意。港安應另覓合適地點作其總圖大計，將此地交回政府，附以作換地申請。

5. 總結此項申請得不到社區之任何支持，及醫院方面未有具體與週邊居民及居民作出此改建項目之解釋，未能清楚之交待，令社區產生極大之迴響及反對，實屬令人遺憾。作為當區區議員，本人亦難以根據任何合理情況，理由或社區所需，而支持此放寬高度申請。經考慮及平衡各方意見後，本人對此次申請不得不作出保留及反對。

黃宏泰

黃宏泰

灣仔區議員 (司徒拔選區)

2020年7月10日

#2/4

#9/4

tpbpd@pland.gov.hk

寄件者:

發件日期:

2020年07月10日星期五 15:00

收件者:

tpbpd@pland.gov.hk

主題:

A/H14/82

Comment relates....

10/7/2020

Seq 2- 5-46



Incorporated Owners of Woodland Heights
2 Wong Nai Chung Gap Road, Hong Kong

HY-WH-L2020-055

14 Aug 2020.

The Secretary of Town Planning Board
c/o Planning Department
North Point Government Offices
333 Java Road, North Point
Hong Kong

Dear Sirs,

Proposed Minor Relaxation of Building Height Restriction for Permitted Hospital Use

40 Stubbs Road, Hong Kong

(Application No A/H14/82 – Further Information by Applicant issued 24 July 2020 to Public Enquiry)

Comments and Objections from Woodland Heights, 25 Wong Nai Chung Gap Road

Thank you for your recent letter on 24 July 2020 providing supplementary information from the Adventist Hospital ("the Hospital"), in response to our opinion issued in Feb 2020 to the captioned.

The Hospital applies to the Town Planning Board ("the Board") on relaxation to building height restriction based on a proposed design of plot ratio 5.59. We found the application and all the supplementary information inadequate to justify the relaxation of building heights and the building intensity as stated at the Outline Zoning Plan S/H14/13, as such, we object to the application by the Hospital for the motion at the reason list hereinafter.

Document references:

1. our letter dated 22 February 2020;
2. our letter dated 2 June 2020 and
3. our letter dated 12 July 2020
4. the application from the Hospital in Dec 2019 and supplementary information in July 2020; Jun 2020 and Dec 2019.

Basis of Objection

We find the application for relaxation of building height and the increase in building intensity unacceptable for the following reasons:

1. The application violates the planning intention
2. It infringes the right of its neighborhood;

Planning intention

The Hospital is zoned under the Outline Zoning Plan No S/H14/13 (hereinafter "the Plan") covering the area around Peak Area in which development rights, scales and constraints including height restriction to each site are listed. It is a document developed over time to reflect and accommodate the status quo of the area.

At the explanatory statement appended to the Plan, the whole peak area has been assigned with low-rise character of different intensities. The Hospital, due to status at the time, is given a medium-rise character for historic reason. Height restriction therein referred to reflects the existing heights. In general, these height restrictions will broadly be kept to ensure the scale and intensity on these sites to be compatible with the surrounding developments to maintain the existing low-rise character of the area.

There is a mechanism to apply for change in the Plan (S16 application) and the criteria of consideration are listed under the explanatory notes to the Plan.

Excerpts of the explanatory notes are as follows:

7.3. Specific building height restriction for the "G/IC" ... zones... mainly reflect the existing building heights of developments, have been incorporated into the Plan. Unless there are committed proposals for known developments or a need to meet the minimum height requirement in general, the existing use and the lower building heights will broadly be kept. The intention is to ensure that the scale and intensity of the development on these sites would be compatible with that of the surrounding developments in order to maintain the existing low-rise character of the Area.

7.4 In general, a minor relaxation clause (on) building height restrictions is incorporated ... to provide incentive for ... redevelopment with planning and design merits and to cater for circumstances with specific site constraints.... (The) relevant criteria for consideration ... are as follows:

- (a)... better urban design local area improvements;
- (b)... surrender/dedication of land ... for use as public passage/street widening
- (c)... better streetscape/good quality street level public urban space
- (d)... providing separation between buildings to enhance air and visual permeability;
- (e)... address specific site constraints
- (f) ... bring about improvements to the townscape and amenity of the locality.

7.5 ..for any existing buildings with building heights already exceeding the building height restrictions ... there is a general presumption against application ... unless under exceptional circumstances.

8.4.6 ...the Adventist Hospital ... consists of two buildings... Main Block of about 165mPD and La Rue building of about 188mPD. To maintain the existing medium-rise character..., the site is restricted to a maximum height of 165 mPD and 190mPD for its northern and southern portion respectively.

There is no proviso for committed proposals or any need to meet the minimum height requirement (paragraph 7.3 above mentioned), hence the relevant criteria at paragraph 7.4 shall follow.

In the Hospital proposal, there is no devotion of land or user rights or improvement in the amenity to the locality, the landscape garden is not opened to public so it must fail the criteria called for from paragraph 7.4 (a, b, c, f). Furthermore, the building intensity (plot ratio 5.59) exacerbates the building separation and deteriorates the air and visual permeability to its neighbour, (7.4 d)

The building height of the existing Main Block of the Hospital is 172mPD which has already exceeded the height restriction of 165mPD, in according to paragraph 7.5, the application should be turned down.

And finally, the maximum building heights to the Hospital was stipulated at the Plan (paragraph 8.4.6) and it should broadly be kept to make it "compatible with that of the surrounding developments to ...maintain the low rise character of the Area" stated at paragraph 7.3 of the Plan.

Here below are the plot ratios of the surrounding development along Stubbs Road/Wong Nai Chung Gap road to the Hospital:

	Development	Designated type	Plot ratio
1	Victoria Height	R(B)1	3
2	Evergreen villa	R(B)1	3
3	Villa Monte Rosa	R(B)1	3
4	Bellevue Court	R(B)1	3
5	Adventist (application)	G/IC	5.59 (proposed)
6	Woodland Heights	R(B)1	3
7	Valley View Court	R(B)1	3
8	Nicholson Tower	R(B)1	3
9	Leon Court	R(B)1	3

The plot ratio represents the building intensity and higher the ratio, denser the intensity. The intensity has a bearing to the loading of traffic network, the sewerage system, light and air permeability to neighborhoods etc. The existing intensity of the Hospital is an odd already among its neighborhood, an application for an even higher one must therefore violate the planning intention.

In summary, the application violates the planning intention by openly challenging the stipulated height restrictions, increasing the intensity of the peak area and trying to take benefit without compensating the locality.

Seq 3 5-48

啟城市規劃委員會秘書：
專人送遞或郵遞：香港北角達發道 333 號北角政府合署 15 樓
傳真：2877 0245 或 2522 8426
電郵：tpbpd@pland.gov.hk

To : Secretary, Town Planning Board
By hand or post : 15/F, North Point Government Offices, 333 Java Road, North Point, Hong Kong
By Fax : 2877 0245 or 2522 8426
By e-mail : tpbpd@pland.gov.hk

有關的規劃申請編號 The application no. to which the comment relates
A/FY14/02 Received on 16/07/2020

意見詳情 (如有需要，請另頁說明)

Details of the Comment (use separate sheet if necessary)

Our previous statement rejecting objectionists
excessive development plan in relation to their plot ratio,
Site Coverage, Building Height, undesirable visual and
environmental impact, excessive tree cutting and car parks numbers
still stands
(See statement of objection attached)

「提意見人」姓名/名稱 Name of person/company making this comment

簽署 Signature 日期 Date 10 Aug 2020

For and on behalf of
THE INCORPORATED OWNERS OF BELLEVUE COURT BLOCK A
OF BELLEVUE COURT, UNIT B1, B2, B3
3 Court
THE INCORPORATED OWNERS OF BLOCK C
3 Court
Signature
Signature

Infringe the rights of neighborhood

The Hospital makes the application based on a design proposal of high building intensity. Early in 2003 when Bellevue Court made similar application, it was turned down for the sake of additional loading to local road system. The Board decision to these applications should be consistent and it would be inequitable if there is to be a different outcome. Furthermore, it would set an undesirable precedent for other similar application in future, the cumulative impact of which would further depart from the Planning Intention of the character of the Peak Area.

As on the rights, the Plan documents the respective right of each site and it is not allowable for the right of one to be undermined as a result of excessive redevelopment by another. When it happens, the Board should stop it from happening. Now the Hospital applies for high building intensity, it in turn exploits capacity of infrastructure; the Board should thus uphold the Intention of the Plan accordingly.

There are in parallel civil rights of neighbors to be considered: Civil rights include free enjoyment of the site with respects to light, air and safety. These rights must not be prejudiced as a result of the Hospital redevelopment and must be factored and burdened as a condition for approval, if any. This is very different from the current attitude of the Hospital where civil rights of neighbors are loosely attended.

In summary, the building intensity in the Hospital's application overstrains the capacity of the infrastructure, both in traffic and sewerage. It infringes the rights, both lease rights and civil rights, of neighbors.

Conclusion

We find the building intensity of the new Hospital high, incompatible with the context of the surrounding area and clearly violate the planning intention as outline in the Plan. Approval of the application, if it happens, will set an undesirable precedent and may be subject to judicial challenge.

The above are our response to the supplementary information and may not be exhaustive. Please put these concerns and objections on record, and we would appreciate your response. Should you have any queries, please do not hesitate to contact us.

Yours faithfully,

For and on behalf of
The Incorporated Owners of Woodland Heights (Wong Nai Chung Gap Road)

Signature
Kwong Lo, Chairman

Douglas Van, Vice Chairman

Carl Lu, Secretary

Cc: Mr Ivan Wong, Councilor, Wan Chai District Council

The Incorporated Owners of Bellevue Court Block A, B & C
c/o Management Office, G Floor, Block B, Bellevue Court, 41, Stubbs Road, Hong Kong

9 July 2020

Secretary
Town Planning Board
15th Floor North Point Government Office
333 Java Road, North Point
Hong Kong

Dear Sir/Madam

Re: Objection to HK Adventist Hospital's application to relax height restriction by-
application not A/H14/82 - Submission of further information by Applicant - May 2020

We refer to your letter (ref: TP8/A/H14/82) dated 19 June 2020, addressed to the
Incorporated Owners of Bellevue Court Block A, B & C and their residents.

We enclosed herewith our latest comments and grounds of objection jointly by our 3
respective Incorporated Owners based on the additional information and revised drawings
Figure 1.1 and Figure V3.1 to V3.10, submitted by Adventist Hospital (AH), the applicant.

Please be reminded that we have already submitted our objection statement to your
Department and the Town Planning Board on 8th February 2020, which was based on AH's
previous submission documents. This current revised objection letter is based on the
information you sent us on 19 June 2020.

All our reasons of objection are self-explanatory and are to be presented to your on-coming
TP Board meeting on the latest hospital application mentioned above.

Yours sincerely
For & on behalf of
the Incorporated Owners of Bellevue Court Blocks A, B & C

For and on behalf of
the Incorporated Owners of Block C,
OF BELLEVUE COURT, BLD. B
15th Floor

THE INCORPORATED OWNERS OF BELLEVUE COURT BLOCK A
OF BELLEVUE COURT, BLD. B
15th Floor

For and on behalf of
THE INCORPORATED OWNERS OF BELLEVUE COURT BLOCK A
OF BELLEVUE COURT, BLD. B
15th Floor

10-AUG-2020 10:20

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Supplementary Sheet (Rev. 2) 9th July 2020

To: the Planning Department, North Point Government Offices, 333 Java Rd., Hong Kong

Objection of Adventist Hospital's application for Minor Relaxation of Building Height
Relaxation for Permitted Hospital Use, 40 Stubbs Road, Hong Kong (Planning Application
A/H14/82) - with submission of further information by applicant, May 2020.

Details of Comments / Objection submitted By The Incorporated Owners of Bellevue Court
Block A, B & C, (Supplementary Sheet)

We refer to the above Planning Application (A/H14/82) and subsequent submission of further
information by the applicant in June 2020. We also refer to our previous objection letters dated
8th February 2020 and 23 May 2020.

Regarding your respective letters to our Incorporated Owners of Bellevue Court Block A, B and C,
dated the 19th June 2020, we would like to reiterate our concerns and objection to Adventist
Hospital's (AH) application for Building Height Relaxation and its resulting over-development of
the hospital.

AH over-sized development and traffic generated would create an adverse and detrimental
impact on the original planning intention and the mid-density and mid-rise character of the
neighbourhood, traffic overloading on Stubbs Road, Blue Pool Road and Tai Hang Road, as
well as negative environmental impacts including potential noise and dust nuisance caused by
the unreasonable long redevelopment time-line proposed by AH.

Our detailed grounds of our objection are as follows:

1 Adventist Hospital's proposed Plot Ratio, Height Restrictions, Site Coverage & Car Park

1.0 Key data of AH's proposed redevelopment scheme are as follows:

- 1.0.1 AH's newly revised proposal of June 2020 submitted to the Town Planning
comprises of 2 blocks (Block 1 and 2) instead of 3 blocks in the previous
February scheme. A & B blocks as proposed in the Jan 2020 submission have
been combined into Block 1 in the latest (May 2020) plan, and previous Block
C is now Block 2.
- 1.0.2 AH has applied for Planning Permission to relax the existing OZP compliance
height restriction (190.518m above PD) by 22.4m, when measured to the
proposed Block 1 plant room at 212.918m PD; and, 17.65m measured from
the Block 1 roof level at 208.168m PD.
- 1.0.3 In AH's May 2020 scheme, proposed height of Block 2 is 176m PD to Green
roof level and 171.3 PD to main roof level. The OZP compliance height for
this block is 165m PD and therefore the height relaxation applied is 11m for
their upper roof level and 6.3m for their main roof level.

1.0.4 Proposed Plot ratio of 5.59 (same as Jan 2020 proposal)

1.0.5 Site Coverage of 56.03% (same as Jan 2020 proposal)

1.0.6 A total number of car parking spaces for 184 cars park + 7 lay-bys for loading/unloading of taxis, ambulances, light buses etc. (same as Jan 2020 proposal)

1.0.7 Different from the Jan 2020 scheme, demarcation 1. In the drawing of the new June 2020 Landscape Proposal (Figure 1), shows that the existing retaining wall to the south (left hand side) of the entrance from Stubbs Road is to be retained and maintained. The drawing also shows that only a small number of existing trees outside AH retaining wall boundary on Stubbs road will be preserved.

1.0.8 This demarked tree preservation area does not seem to cover the existing mature trees located inside the retaining wall to the south of the car entrance within the AH boundary, nor the existing mature trees that are currently located on the north (right side) of the entrance. (see photo plate A below)

1.0.9 The location of proposed new lift tower and Terraced Garden (demarcation 1 & 3 on on Figure 1.1) behind the existing retaining wall on south side of the car entrance as well as the Courtyard Garden (demarcation 2 on Figure 1.1) on the north side of the car entrance would necessitate the felling of most of the existing mature trees in the two areas.

1.1 Bellevue Court's 2003 Objection to the Outline Zoning Plan (OZP) No. S/H14/6

Historical background & previous Planning Decisions made by the TPB

1.1.1 In 2003, Town Planning Department's Peak Area OZP imposed an "Existing Bulk" restriction of plot ratio (i.e. future redevelopment to be no more than what is existing in a development) and upper limit of building heights to "existing building heights" to all 7 numbers of R(B)1 sites along Wong Nai Chung Gap Road and Upper Stubbs Road in the neighbourhood. Bellevue Court was one of the sites affected.

1.1.2 Individual owners and the Incorporated Owners Bellevue Court, alongside with other site owners in the neighbourhood submitted objections of the draft OZP to the Town Planning Board.

1.1.3 Bellevue Court's reasons for their objection were that majority of the restricted sites in the area were over 40 to 50 years old and were due for redevelopment. The newly imposed Height and Plot Ratio restrictions would practically dampen any future potential developer's interest and incentive in redeveloping the sites affected by the OZP.

1.1.4 Furthermore, owners of Bellevue Court argued that it was inequitable for the government to have allowed 2 towers at 41C and 41D Stubbs Road to build to high plot ratios (to 5 and 8 respectively) and to excessively tall heights of 67 & 69 storeys (likewise, Nicholson Tower, was also permitted in the past to build up 30 storeys and to a plot ratio of 5.1.), and then afterwards harshly restricted Plot Ratio of the remaining 7 sites to existing bulk and heights.

1.2 Rejection of Bellevue Court's owners' objection by the Town Planning Board (TPB)

1.2.1 After a meeting held on the 14th March 2003, The Town Planning Board rejected Bellevue Court's and various neighbourhood owners' objections, stating the following grounds in their reply letters (See Attachment A -letter from Town Planning Board to the Incorporated Owners of Bellevue Court Block A - Ref: TPB/O/S/H14/6-3-)

1.2.2 The two "super-tall" towers at 41C and 41D Stubbs Road were incompatible with the pre-dominant medium density and medium-rise development character of the area.

1.2.3 TPB explained that the restrictions of Plot Ratio and Heights (to existing bulk) on the R(B)1 zone sites (including Bellevue Court) were to "maintain this existing pre-dominant character of the area", and to "preserve public views" and to "protect the ridgeline" (behind the buildings)

1.2.4 The plot ratio restriction is "to avoid overtaxing the local road system" increase development intensity in the uphill area "would adversely affect the traffic in the downhill area".

1.2.5 Development restrictions stipulated in the OZP is "to reflect the planning intention of the area".

1.2.6 Proposed Rezoning (by Bellevue Court and other objections proposed an alternative higher plot ratio and height limit) would create an undesirable precedent. The cumulative effect of approving similar rezoning would result in adverse traffic impact and would change the medium rise, medium density character of the area.

1.2.7 In summary, the Planning Intentions behind the Outline Zoning Planning as endorsed by the Town Planning Board's meeting and subsequent hearing, can be clearly summarised as follows:

1.2.7.1 The super-tall developments of the Summit & Highcliff (41C and 41D Stubbs Road respectively, (and by implication should include also the 30 storey towers of Nicholson Tower) are considered incompatible with development character of the area,

1.2.7.2 Development restrictions (of Plot Ratios and Heights) stipulated in the

OZP is to reflect the planning intention of the area, which is to maintain the pre-dominant medium density and medium-rise character of the area, to preserve public view and to protect the ridge line (of the hill behind)

1.2.7.3 The OZP plot ratio restrictions is also to avoid overtaxing the local road system. Increase in development intensity would adversely affect the traffic downhill from the subject area.

1.3 Development details of the existing sites in the neighbourhood

Sites	Ex. Plot Ratio	Ex. Height (storeys)
41 Stubbs Rd (Bellevue Court)	3.8	13s & 14s
<u>41D Stubbs Rd * (Highcliff)</u>	<u>8.0 *</u>	<u>69s</u>
<u>41C Stubbs Rd** (The Summit)</u>	<u>5.0 *</u>	<u>67s</u>
41A Stubbs Rd (Villa Monte Rosa)	3.0	21s & 22s
43 Stubbs Rd (Evergreen Villa)	3.0	18s, 20s, 21s
43A Stubbs Rd (Victoria Heights)	3.0	24s
2 Wong Nai Chung Gap Rd (Woodland Heights)	2.6	16s
4A-D Wong Nai Chung Gap Rd (Valley View)	1.7	9s
<u>6-10 Wong Nai Chung Gap Rd** (Nicholson Tower)</u>	<u>5.1**</u>	<u>30s</u>
12-14 Wong Nai Chung Gap Rd (Leon Court)	3.1	12s

* Town Planning Board considered Plot Ratio excessive and incompatible with neighbourhood's mid-density, mid-rise character.

** This should also be considered incompatible with neighbourhood character as it is 30 storeys tall

2.0 Detail grounds behind Bellevue Court's Objections

2.1 Objection to AH's application for Relaxation of Height Restrictions

AH's current Planning application is to ask the TPB for permission to relax the OZP height restriction from 190.918 m PD to 212.918 PD (22.4m higher) on their redevelopment plan, adding some 5 storeys of hospital floors above the existing height limit. This is equivalent to 6 to 7 storeys of a domestic buildings.

Bellevue Court, immediate neighbour AH's site on the north, is subject to OZP height restriction to its existing height of 189.42 m PD (measured to highest roof level). AH application to relax and increase their height restriction, if approved, shall be 23.45m above the maximum height of Bellevue Court, meaning that AH height would be about 7 domestic storeys higher than Bellevue Court.

Woodland Heights, neighbour to AH's south boundary, is also subject to OZP height restriction. According to AH's planning application document, it has an existing max. height restriction of 195m PD. Consequently, AH's proposed new height of 212.918 m PD will be 17.918m higher than Woodland Heights, which is equivalent to about 5.56 domestic storeys higher than Woodland Heights. In other words, AH's application to relax the OZP height restriction compliance would result in its redevelopment protruding dominantly above its neighbouring development.

The plot ratio of 5.59 and a site coverage of 56.03% have contributed to the excessive bulk and height of Block 1 of the proposed hospital. In view of the OZP's original planning intention of maintaining mid-rise, medium density character of the neighbourhood, as well as the potential severe traffic concern mentioned in section 1.2.7.1 to 1.2.7.3 above, the application to relax AH's height restriction is too excessive and should not be approved.

2.2 Excessive Plot Ratio

It should be noted that the lifting of AH's height restriction not only would result in their new development protruding above its two neighbour buildings, it would indirectly result in enabling AH's scheme to achieve a plot ratio of 5.59 for their development.

Referring to Table 1.3 above, apart from the 2 tall towers of Highcliff (plot ratios of 8 with 69 storeys) and The Summit (plot ratio 5 with 67 storeys), as well as Nicholson Tower (plot ratio 5.1 of 30 storeys), the majority of the plot ratio restrictions of the remaining residential buildings sites along the neighbouring stretch of Stubbs Road and Wong Nai Chung Gap Road ranges from 1.7 to 3.8, with an average of 2.89.

This high plot ratio, together with the extra height and site coverage discussed below, will collectively contributed to the visual bulk of the hospital building if approved. (see application document figure V9.37 - viewpoint C). AH's proposed plot ratio of 5.59 is double the average in the area and therefore too excessive for the area. Considering that the original planning intention of the OZP is to maintain the Mid-rise and Mid-density character of the neighbourhood, AH's scheme is clearly contradicting the OZP planning intention. The scheme should not be approved unless we see a reduction of its plot ratio, height and site coverage compatible with other sites in the area.

2.3

Excessive Site Coverage

In the AH planning application document, there is no data provided for comparison of site coverage of various buildings in the neighbourhood. Bellevue Court is an example of typical development built in the area in the 1960s. We therefore use Bellevue Court's site coverage to compare with the site coverage of the AH proposal. The site coverage in the AH scheme is 56.03%, while the Bellevue Court existing site coverage is 27.5%, about half of AH's proposal.

This high site coverage is one of the contributory reasons for why AH's redevelopment is looking so visually dense and bulky, and why its upper Block 1 had to be built up to its edge boundaries, as well as the car park building fronting Stubbs being so tall and bulky in size. (see figure 1.1 and V3.6- viewpoint C).

We therefore conclude that AH's coverage is way too excessive in relation to the site coverage of the neighbouring development and therefore must be reduced.

2.4

Excessive Car Park Provisions

The proposed provision of 184 car parks and 7 loading bays in the proposal is also excessive. The additional car parks and loading bays would result in increase in traffic loading in the neighbourhood road system. Lower Stubbs Road, Blue Pool Road and Tai Hang Roads are already very congested at peak used and rush hour time. The excessive provision of 184 car parks and 7 loading bays for service vehicles not only contributes to bulk and density of the development, it also contradicts the Town Planning Board's traffic concerns and the OZP planning intention for the area. (see sections 1.2.4 and 1.2.7.3 above)

Excessive traffic impact was one of the major reasons for the rejection of the previous neighbouring sites' applications to relax the plot ratio and height restriction stipulated by the OZP in 2003. We therefore conclude that the number of carparking and loading bay is far too excessive and the TPB should not approved such number.

2.5

Undesirable Visual Impact of the redevelopment on the neighbourhood environment character

Despite the proposed new scheme of May 2020, the street fronting lift tower, the wide elevation of Block 2, as well as the fully stretched elevation of Block 1 across the entire width of the site, visually present a harsh looking bulk of building fronting Stubbs Road and the neighbourhood. This is especially obvious when we compare the new scheme with the existing round shape of the existing building. For the benefit of the environment and preserving the character of the neighbourhood AH should also consider conserving and refurbishing the existing building instead of demolition and rebuild. (see figure 1 and V3.6/-photomontage viewpoint C)

5

Furthermore, the proposed free standing Lift Tower located at the edge of Stubbs Road in front of Block 2 is a visually dominant and not in character with the visual context of the neighbourhood.

2.6

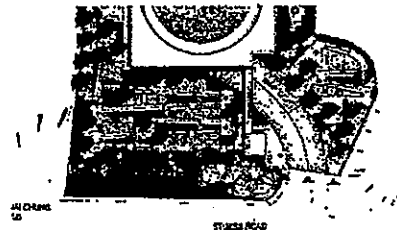
Preservation of the mature trees on site should be fully considered in drawing

Different from the Jan 2020 scheme, demarcation 1. In the drawing of the new June 2020 Landscape Proposal (Figure 1), shows that the existing retaining wall to the south (left hand side) of the entrance from Stubbs Road is to be retained and maintained. The drawing also shows that only a small number of existing trees outside AH retaining wall boundary on Stubbs road will be preserved.

This demarked tree preservation area does not seem to cover the existing mature trees located inside the retaining wall to the south of the car entrance within the AH boundary, nor the existing mature trees that are currently located on the north (right side) of the entrance. (see photo plate A below)

The location of proposed new Lift tower and Terraced Garden (demarcation 1 & 3 on Figure 1.1) behind the existing retaining wall on south side of the car entrance as well as the Courtyard Garden (demarcation 2 on Figure 1.1) on the north side of the car entrance would necessitate the felling of most of the existing mature trees in the two areas.

We are of the opinion that felling of these trees would be highly unacceptable in the interest of environmental protection and tree preservation. As the scheme shows insufficient sensitivity and respect to the existing mature trees and the environment, we object to the entrance area design of AH redevelopment plan.



7

2.1.7 The unreasonable long construction programme

The 3 phase long project programme stretching over 15 years in 3 phases for a private redevelopment of its scale is unacceptable to its neighbours.

The pro-longed redevelopment programme would post an unnecessary long period of disturbances to the area in terms of nuisance cause by construction noise, dirt and dust pollutions, potential crime and security issues, as well as traffic delays caused by truck deliveries and utility connection works etc.

We are not sure of the reason behind this abnormally long redevelopment programme (15 years in 3 phases) and there is no clear and detailed account of how the development will be physically phased, nor to what extent existing hospital services would be disrupted or suspended during the construction period.

We are not certain why AH needs such an abnormally long redevelopment time and phasing programme. Whether it is due to reasons such as the complexity of keeping existing hospital services in operation, or technical complexity in implementing the construction work, or due to financial constraints and cash-flow needed to finance the huge cost of site formation and building on their back slope, it all points to the possibility that AH's complex redevelopment is oversized and over-ambitious.

In any case, the proposal is insensitive to the site's inherent character and constraints and it contravenes the planning intention of the Outline Zoning Plan of the area.

2.2. Is Adventist Hospital redevelopment plan fully benefit the community at large?

The AH stated that the redevelopment would increase 70% more beds provision to meet the needs of the community.

However, there is no objectively proven evidence that such demand is so large that it renders for the Town Planning Board to approve the relaxation of OZP height restriction which would result in endorsing such a high density of development in the area.

The reasons for our questioning of the over-size, over-ambitious nature of the AH redevelopment proposal is as follows:

2.2.1 Adventist Hospital is high quality but very expensive private hospital, affordable by and benefiting only high-net worth individuals and executives of large companies in the community, and not the general public at large.

2.2.2 The proximity of site location on Hong Kong Island is not short of private hospitals. Examples are:

- A Gleneagles Hospital at lower Nam Fung Road (500 beds)
- B St. Paul's Hospital, with its recently built extension at the bottom of Tai Hang Road (400 beds)
- C HK Sanatorium & Hospital in Happy Valley (480 beds)

In addition, there are also the old private Matilda Hospital at the Peak and Caritas Canossa Hospital in Old Peak Road Central.

2.2.3 In view of the above and the undesirability of AH's over-size proposal, we strongly recommend that AH's project should be cut back to a more reasonable size with plot ratio, site coverage and heights (not to exceed the OZP height) that can commensurate and enhance the character and suburban quality of the neighbourhood.

3.0 Conclusion

The Town Planning Department and Town Planning Board is requested to refrain from approving Adventist Hospital's height limit relaxation application for reasons below:

3.1 The development is excessive in Height, Plot Ratio and Site Coverage, resulting in an excessive building bulk, for reasons outlined in detail in Section 2.1 above.

3.2 The traffic generated by the additional car-parking in the new development directly contradicts the very reason why height and plot ratio had to be restricted under the 2003 OZP. The carpark numbers are unacceptably too high.

3.3 AH's application report has not given due consideration to the development's visual impact and its respect of the character of the neighbourhood, and has no full proposal on how to conserve ALL the existing mature trees in the area.

3.4 The application has not demonstrated how it would mitigate the potential prolonged nuisance caused by the redevelopment process nor has it outlined how AH's medical operation and services are affected and organised during the phased construction work.

3.5 Adventist Hospital is supposed to be a NGO providing medical service to the community and should not be seen profiting from it. There are plenty of expensive private hospital capacities on Hong Kong Island. Given the context of the site, there is no sound reason for AH to redevelop to such an excessive manner.

3.6 Referring to the Town Planning Board's previous disapproval letter to Bellevue Court's application dated 28 March 2003 (reference TPB/O/S/H14/6-A), approving AH's application to relax height limit is inequitable to all owners in the nearby

致城市規劃委員會秘書：

專人送遞或郵遞：香港北角道第333號北角政府合署15樓

傳真：2877 0245 或 2522 8426

電郵：tpbpd@pland.gov.hk

To : Secretary, Town Planning Board

By hand or post : 15/F, North Point Government Offices, 333 Java Road, North Point, Hong Kong

By fax : 2877 0245 or 2522 8426

By e-mail : tpbpd@pland.gov.hk

1/3

5-49

neighbourhood, whose previous developmental potential had to be reduced, height restricted and sacrificed for the common purpose of conserving the 'mid density' and 'mid-rise' character of the neighbourhood, as well as to avoid over-taxing of traffic on the local road network.

If the Town Planning Board is to approve AH's current application to relax their OZP height restriction, it would create an undesirable precedent that destroy the integrity of the original planning intention, and potentially open up to challenge through Judicial Review in the future by owners in the neighbourhood.

For and on behalf of:

THE INCORPORATED OWNERS OF BELLEVUE COURT BLOCK A

THE INCORPORATED OWNERS OF BELLEVUE COURT BLOCK B

For and on behalf of:
The Incorporated Owners of Block C of Bellevue Court

THE INCORPORATED OWNERS OF BELLEVUE COURT BLOCK C

有關的規劃申請編號 The application no. to which the comment relates

A/H/L4/82 Received on 06/05/2020

意見詳情 (如有需要，請另頁說明)

Details of the Comment (use separate sheet if necessary)

詳情請看附件 3/3

「提意見人」姓名/名稱 Name of person/company making this comment

簽署 Signature 日期 Date 14/8/2020

反對此申請

3/3

1. 醫院重建之很多未知數是否不必果地放在申請內？故此不必要之設施，應出之不必要空間，令到樓宇之高度不需申請那麼高，高度限制申請放棄是很大可能無需要。

2. 此申請之前未和醫院週知之設施作任何深入溝通，沒有維持社區和諧。提出之交通環境評估報告粗略，未能夠及有仔半山現今及未來十年，交通日見繁忙之實際問題。

3. 整個重建計劃需時 15 年，完全不合常理及因廢制週邊生活環境之長期影響。特別是對附近學校造成之噪音影響，未有交待，實屬有點自私之構思，對週邊居民寧靜生活環境亦置之不理。對病人在建築期內之照顧，到今天還未有一套解決方案，未盡醫院應有之基本責任。一經派行對社區和諧造成十分壞之影響先例，另此申請全面推翻規劃署多年前，對此區實施之高度限制，否定期型累年前決定。在沒有具體合理情況下，任意再度提高申請。

4. 多年前之構思，港安醫院只是作為小型社區醫院，其選址及面積絕非道台作為大型綜合醫院，現有規模以是超出原意。港安應另覓合適地點作其擴大大計，將此地交回政府以作換地申請。

5. 此項申請得不到社區之支持，及醫務方面未有具體與週邊屋苑及居民作出此改建項目之解釋，未能清楚之交待，令社區產生極大之迴響及反對，實屬令人遺憾。作為當區區議員，本人亦難以根據任何合理情況，理由或社區所需，而支持此放寬高度申請。經考慮及平衡各方意見後，本人對此次申請不得不作出保留及反對。

6. 總結而言，醫院提交多次修訂之文件內，均未能向居民解釋它為何有必要提高樓宇之高度給公眾合運地解釋因增高而多了之實用面積具體使用情況，故此份申請在今大很遺憾未能滿足公眾之期望及知情權。在此等資訊缺乏情況下，若批中此項申請，難以向公眾及規劃署交代，平衡各方利弊下，只能反對此項申請。

黃宏泰

黃宏泰

灣仔區議員 (何維拔道選區)

2020 年 8 月 14 日

☐ Urgent ☐ Return receipt ☐ Sign ☐ Encrypt ☐ Mark Subject Restricted ☐ Expand personal/public groups



Comments on the Supplementary Information of Planning Application (No. AH14/82)

14/08/2020 09:35

From: Villa Monte-Rosa <villamonte.rosa@hongyip3.com>

To: lpbpd@pland.gov.hk

FileRef:

1 attachment

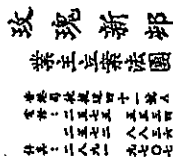


SKM_C36820081409170.pdf

Dear Sir/Madam,
Please check the attachment for your further action.
Thank you.

Regards
Jenny Lo
Customer Service Office
Villa Monte Rosa

Tel: 2572 8836
Fax: 2891 9707



41A, SYLVESTER ROAD, KONG KONG.
TELEPHONE: 2576 5834, 2572 8216
FAX NO. 2581 9707

Date: 13th August, 2020

**The Secretary of the Town Planning Board
15th Floor, North Point Government Offices,
333 Java Road,
North Point,
Hong Kong.**

Dear Sirs,

Re: Comments on the Supplementary Information of Planning Application (No. A/H14/82)

Proposed Minor Relaxation of Building Height Restriction for

Permitted Hospital Use at 40 Stubbs Road, Hong Kong

We refer to the supplementary information of planning application (No. A/H14/82) submitted by the applicant on 16th July 2020 regarding the proposed relaxation of building height restriction for the Hong Kong Adventist Hospital ("HKAH") at 40 Stubbs Road. On behalf of the residents of the 240 units in Villa Monte Rosa ("VMR"), 41A Stubbs Road, we strongly object to the application and have the following comments: -

Attachment II Responses-to-Comments to Public Comments

- Item 1: Worsening Traffic along Stubbs Road and/or the Roundabout**
The applicant responded that the potential construction activities will be properly managed and controlled such that the traffic impact on the neighbourhood will be minimized. However, there is still no concrete and informative data to illustrate the effectiveness of their proposed measures. We have no idea of what extent the impact can be "minimized".

The traffic impact is not only referring to the vehicles, but also the greatly increased numbers of construction workers during the construction phase. By observation, the capacity of bus route No. 15 and No. 6 is nearly saturated during peak hours. It is questioned that the public transportation (both bus and minibuses) will not be sufficient to deal with the situation. The applicant should evaluate the impacts on the public transportation.

- Item 4: Development Period**
- The applicant mentioned that the development period will be 15 years. The nuisances and inconveniences caused over the extremely long development period will be significant to the neighbourhood, even though the impacts of different aspects (traffic, air, noise, visual) are claimed to be minimized as far as they can.
- The length of the construction period is one of the crucial factors. Although the applicant responded that the 15-years development period includes all administrative and planning works, but not solely the construction period. The actual construction period will be less than 15 years. However, the applicant did not provide a clear information on how long the actual construction works will last. We cannot accept the development to last for 15 years which is unfair to the neighbourhood that the enjoyment of a reasonable living environment is interrupted for such a long period.

- Item 16: No Informative Inputs**
The applicant still did not provide informative inputs and illustration of how the impacts on the neighbourhood are adequately addressed and how. The applicant did not provide illustration of how they evaluate the impacts to be minimized. Are the minimized levels of the impacts reasonable and acceptable by the neighbourhood?

The responses provided by the applicant are still too vague. The applicant should respond direct to the point with adequate information supported.

Finally, the time period allotted for comments to be submitted by the public is an unreasonably short period for the affected parties to respond to a massive redevelopment project that has serious implications for all nearby residents. We ask that you extend the consultation period and request the applicant to respond to the omitted questions and comments from the various government departments and the public.

We look forward to your earliest response. Should you have any queries, please contact our Estate Manager, Ms. Anna Lai at 2572-8836.

Yours faithfully,
For and on behalf of

The Incorporated Owners of Villa Monte Rosa


Mr. Leland Sun

就規劃申請/覆核提出意見 Mailing Comment on Planning Application / Review
參考編號 200814-095547-39627

提交限期 14/08/2020
Deadline for submission:

提交日期及時間 14/08/2020 09:55:47
Date and time of submission:

有關的規劃申請編號 A/H14/82
The application no. to which the comment relates:

「提意見人」姓名/名稱 The Incorporated Owners of Villa Monte Rosa
Name of person making this comment:

意見詳情
Details of the Comment :

Dear Sirs,

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We look forward to your earliest response. Should you have any queries, please contact our Estate Manager, Ms. Anna Lai at 2572-8836.

Yours faithfully,

For and on behalf of

The Incorporated Owners of Villa Monte Rosa

Mr. Leland Sun

致城市規劃委員會秘書：

專人送達或郵遞：香港北角遼寧道 333 號北角政府合署 15 樓

傳真：2877 0245 或 2522 8426

電郵：tpbpd@pland.gov.hk

Seq 4 5-51

To : Secretary, Town Planning Board

By hand or post : 15/F, North Point Government Offices, 333 Java Road, North Point, Hong Kong

By Fax : 2877 0245 or 2522 8426

By e-mail : tpbpd@pland.gov.hk

有關的規劃申請編號 The application no. to which the comment relates

A/E14/82 Received on 02/11/2020

意見詳情 (如有需要, 請另頁說明)

Details of the Comment (use separate sheet if necessary)

Please see Supplementary Sheet (Ref 3) 28th Nov 2020 attached

hereinafter

「提意見人」姓名/名稱. Name of person/company making this comment of Bellevue Court Blocks A, B

簽署 Signature see below 日期 Date 30 Nov 2020

For and on behalf of

THE INCORPORATED OWNERS OF BELLEVUE COURT BLOCK B

THE INCORPORATED OWNERS OF BELLEVUE COURT BLOCK A

Authorized Signature

For and on behalf of THE INCORPORATED OWNERS OF BELLEVUE COURT BLOCK A

Authorized Signature

-2-

申請編號 Application No. : A/E14/82

與申請地點/處所有關的先前申請

Previous Applications Covering the Application Site/Premises

申請編號 Application No.	擬議用途/發展 Proposed Use/Development	城市規劃委員會的決定(日期) Decision of Town Planning Board (Date)
	沒有 N/A	

有關資料是為方便市民大馬路而提供。對於所載資料在使用上的問題及文義上的歧異，城市規劃委員會概不負責。若有任何疑問，應諮詢申請人提交的文件。

The information is provided for easy reference of the general public. Under no circumstances will the Town Planning Board accept any liabilities for the use of the information nor any inaccuracies or discrepancies of the information provided. In case of doubt, reference should always be made to the submission of the applicant.

Supplementary Sheet (Rev. 3) 28th Nov 2020

To: the Planning Department, North Point Government Offices, 333 Java Rd., Hong Kong

Objection of Adventist Hospital's application for Minor Relaxation of Building Height Relaxation for Permitted Hospital Use, 40 Stubbs Road, Hong Kong (Planning Application A/H14/82) - with submission of further information by applicant, 2 Nov 2020.

Details of Comments / Objection submitted By The Incorporated Owners of Bellevue Court Block A, B & C, (Supplementary Sheet)

We refer to the above Planning Application (A/H14/82) and your original Statutory notice issued by the Town Planning Board dated 21 January 2020, to our 3 respective Incorporated Owners of Bellevue Blocks A, B & C.

We also refer to our subsequent objection letters dated 8th February 2020 in response to the above notice, as well as our subsequent objection letters in 9th July 2020, to submissions of further information by Adventist Hospital on 12th June 2020, 16th July 2020.

In response to your latest letter to us dated 10th Nov 2020, we write again to reiterate our objection to Adventist Hospital's (AH) application for Building Height Relaxation and its resulting over-development of the hospital.

Summary Statement of Bellevue Court's Objection:

AH over-stred development and traffic generated by it would create an adverse and detrimental impact on the overall planning intention of conserving the mid-density and mid-rise character of the neighbourhood. It would create traffic over-loading on the already strained lower Stubbs Road, Blue Pool Road and Tai Hang Road. It would also cause negative environmental impacts to the neighbourhood, including inadequate regards to preserve existing mature trees in the area, and potential noise and dust nuisance caused by the unreasonably long redevelopment time-line proposed by AH.

In addition, the existing OZP has imposed a blanket restriction in all future redevelopments in terms of plot ratio and height in the neighbourhood area to "existing bulk" only. Any relaxation of restriction by the Town Planning Board to the Adventist Hospital site would be considered as very unfair to other owners in the area whose future redevelopments are restricted by the OZP to existing Plot Ratio and Heights only.

If the AH application is approved by the Town Planning Board, it would set undesirable and unfair precedence which is opened to legal challenge by owners and potential developers intending to redevelop the existing buildings in the future.

Adventist Hospital's proposed Plot Ratio, Height Restrictions, Site Coverage & Car Park

1.0 Key observations of AH's proposed redevelopment scheme are as follows:

- 1.0.1 AH's newly revised proposal of Nov 2020 submitted to the Town Planning comprises of 2 blocks (Block 1 and 2) instead of 3 Blocks in the original February scheme. A & B blocks as proposed in the Jan 2020 submission have been combined into Block 1 in the latest (Nov 2020) plan, and previous Block C is now Block 2.
- 1.0.2 AH has applied for Planning Permission to relax the existing OZP compliance height restriction (190.518m above PD) by 22.4m, when measured to the proposed Block 1 plant room at 212.918m PD; and, 17.65m measured from their Block 1 roof level at 208.168m PD.
- 1.0.3 In AH's May 2020 scheme, proposed height of Block 2 is 176m PD to Green roof level and 174.3 PD to main roof level. The OZP compliance height for this block is 165m PD and therefore the height relaxation applied is 11m for their upper roof level and 6.3m for their main roof level.
- 1.0.4 In other words, the height proposed and relaxation applied for in the last scheme in May 2020 is the same as the current Nov scheme.
- 1.0.5 Proposed Plot ratio of 5.59 (same as Jan & May 2020 proposal)
- 1.0.6 Site Coverage of 56.03% (same as Jan & May 2020 proposal)
- 1.0.7 A total number of car parking spaces in the recent Nov scheme is 184 cars park (same as Jan, Jun & July 2020 proposals). However, the 7 lay-bys for loading/unloading of taxis, ambulances, light buses etc. of the previous schemes have been further increased to 11 nos in the Nov 2020 proposal.
- 1.0.8 Different from the Jan 2020 scheme, demarcation 1 in the drawing of the new July 2020 and Nov 2020 landscape Proposals (Figure 1.1), both show that the existing retaining wall to the south (left side) of the entrance from Stubbs Road is to be partially retained and partially reduced by demolishing its top section (Figure 3.6 bottom photo).
- 1.0.9 Figure 1 shows that neither the existing mature trees located inside and along the retaining wall to the south of the car entrance, nor the existing mature trees currently located on the north (right side) of the will be preserved. (see also photo plate A in section 2.6 below)
- 1.0.10 The location of proposed new lift tower and Terraced Garden (demarcation 1 & 3 on Figure 1.1) behind the existing retaining wall on south side of the car entrance as well as the Courtyard Garden (demarcation 2 on Figure 1.1) on the north side of the car entrance would necessitate the felling of most of the existing mature trees in the two areas.

1.1 Bellevue Court's 2003 Objection to the Outline Zoning Plan (OZP) No. S/H14/6

Historical background & previous Planning Decisions made by the TPB

1.1.1 In 2003, Town Planning Department's Peak Area OZP imposed an "Existing Bulk" restriction of plot ratio (i.e. future redevelopment to be no more than what is existing in a development) and upper limit of building heights to "existing building heights" to all 7 numbers of R(B)1 sites along Wong Nai Chung Gap Road and Upper Stubbs Road in the neighbourhood. Bellevue Court was one of the sites affected.

1.1.2 Individual owners and the Incorporated Owners Bellevue Court, alongside with other site owners in the neighbourhood submitted objections of the draft OZP to the Town Planning Board.

1.1.3 Bellevue Court's reasons for their objection were that majority of the restricted sites in the area were over 40 to 50 years old and were due for redevelopment. The newly imposed Height and Plot Ratio restrictions would practically dampen any future potential developer's interest and incentive in redeveloping the sites affected by the OZP.

1.1.4 Furthermore, owners of Bellevue Court argued that it was inequitable for the government to have allowed 2 towers at 41C and 41D Stubbs Road to build to high plot ratios (to 5 and 8 respectively) and to excessively tall heights of 67 & 69 storeys (likewise, Nicholson Tower, was also permitted in the past to build up 50 storeys and to a plot ratio of 5.1), and then afterwards harshly restricted Plot Ratio of the remaining 7 sites to existing bulk and heights.

1.2 Town Planning Board rejected Bellevue Court's objection to the "Existing-Bulk Restriction" imposed by the 2003 Outline Zoning Plan

1.2.1 At a TPB meeting held on the 14th March 2003, Bellevue Court's and various neighbourhood owners' objections were rejected. The following are grounds of their rejection in their reply letters (See Attachment A - Letter from Town Planning Board to the Incorporated Owners of Bellevue Court Black A - Ref. TPB/O/5/H14/6-3-)

1.2.1.1 The two "super-tall" towers at 41C and 41D Stubbs Road were incompatible with the pre-dominant medium density and medium-rise development character of the area.

1.2.1.2 TPB explained that the restrictions of Plot Ratio and Heights (to existing bulk) on the R(B)1 zone sites (including Bellevue Court) were to "maintain this existing pre-dominant character of the area", and to "preserve public views" and to "protect the ridge line" (behind the buildings)

1.2.1.3 The plot ratio restriction is "to avoid overtaxing the local road system". Increase development intensity in the uphill area "would adversely affect the traffic in the downhill area."

1.2.1.4 Development restrictions stipulated in the OZP is "to reflect the planning intention of the area."

1.2.1.5 Proposed Rezoning (by Bellevue Court and other objectors) proposed an alternative higher plot ratio and height limit would create an undesirable precedent. The cumulative effect of approving similar rezoning would result in adverse traffic impact and would change the medium rise, medium density character of the area.

1.2.2 In summary, the Planning Intentions behind the Outline Zoning Planning as endorsed by the Town Planning Board's meeting and subsequent hearings, can be clearly summarised as follows:

1.2.2.1 The super-tall developments of the Summit & Highcliff (41C and 41D Stubbs Road respectively) and by implication should include also the 30 storey towers of Nicholson Tower are considered incompatible with development character of the area.

1.2.2.2 Development restrictions (of Plot Ratios and Heights) stipulated in the OZP is to reflect the planning intention of the area, which is to maintain the pre-dominant medium density and medium-rise character of the area, to preserve public view and to protect the ridge line (of the hill behind)

1.2.2.3 The OZP plot ratio restrictions is also to avoid overtaxing the local road system. Increase in development intensity would adversely affect the traffic downhill from the subject area.

1.3 Development details of the existing sites in the neighbourhood

Sites	Ex. Plot Ratio	Ex. Height (storeys)
41 Stubbs Rd (Bellevue Court)	3.8	13s & 14s
41D Stubbs Rd * (Highcliff)	8.0 *	69s
41C Stubbs Rd* (The Summit)	5.0 *	67s
41A Stubbs Rd (Villa Monte Rosa)	3.0	21s & 22s
43 Stubbs Rd (Evergreen Villa)	3.0	18s, 20s, 21s

3

4

43A Stubbs Rd (Victoria Heights)	3.0	24s
2 Wong Nai Chung Gap Rd (Woodland Heights)	2.6	16s
4A-D Wong Nai Chung Gap Rd (Valley View)	1.7	9s
6-10 Wong Nai Chung Gap Rd** (Nicholson Tower)	5.1**	30s
12-14 Wong Nai Chung Gap Rd (Leon Court)	3.1	12s

* Town Planning Board considered Plot Ratio excessive and incompatible with neighbourhood's mid-density, mid-rise character.

** This should also be considered incompatible with neighbourhood character as it is 30 storeys tall

2.0 Detail grounds of Bellevue Court's Objections

2.1 Objection to AH's application for Relaxation of Height Restrictions

AH's current Planning application is to ask the TPB for permission to relax the OZP height restriction from 190.518 m PD to 212.918 PD (22.4m higher) on their redevelopment plan, adding some 5 storeys of hospital floors above the existing height limit. This is equivalent to 6 to 7 storeys of a domestic buildings.

Bellevue Court, immediate neighbour AH's site on the north, is subject to OZP height restriction to its existing height of 189.42 m PD (measured to highest roof level). AH application to relax and increase their height restriction, if approved, shall be 23.45m above the maximum height of Bellevue Court, meaning that AH height would be about 7 domestic storeys higher than Bellevue Court.

Woodland Height, neighbour to AH's south boundary, is also subject to OZP height restriction. According to AH's planning application document, it has an existing max. height restriction of 195m PD. Consequently, AH's proposed new height of 212.918 m PD will be 17.918m higher than Woodland height, which is equivalent to about 5.56 domestic storeys higher than Woodland Heights. In other words, AH's application to relax the OZP height restriction compliance would result in its redevelopment protruding dominantly above its neighbouring development.

The plot ratio of 5.59 and a site coverage of 56.03% have contributed to the excessive bulk and height of Block 1 of the proposed hospital. In view of the OZP's original planning intention of maintaining mid-rise, medium density character of the neighbourhood, as well as the potential severe traffic concern mentioned in section 1.2.7.1 to 1.2.7.3 above, the application to relax AH's height restriction is too excessive and should be disapproved.

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2.2 Excessive Plot Ratio

It should be noted that the lifting of AH's height restriction not only would result in their new development protruding above its two neighbour buildings, it would indirectly result in enabling AH's scheme to achieve a plot ratio of 5.59 for their development.

Referring to Table 1.3 above, apart from the 2 tall towers of Highcliff (plot ratios of 8 with 69 storeys) and The Summit (plot ratio 5 with 67 storeys), as well as Nicholson Tower (plot ratio 5.1 of 30 storeys), the majority of the plot ratio restrictions of the remaining residential buildings sites along the neighbouring stretch of Stubbs Road and Wong Nai Chung Gap Road ranges from 1.7 to 3.8, with an average of 2.89.

This high plot ratio, together with the extra height and site coverage discussed below, will collectively contributed to the visual bulk of the hospital building if approved. (see application document: figure V3.3/- viewpoint C).

AH's proposed plot ratio of 5.59 is double the average in the area and therefore too excessive for the area. Considering that the original planning intention of the OZP is to maintain the Mid-rise and Mid-density character of the neighbourhood, AH's scheme is clearly contradicting the OZP planning intention.

The scheme should not be approved unless we see a reduction of its plot ratio, height and site coverage compatible with other sites in the area.

2.3 Excessive Site Coverage

In the AH planning application document, there is no data provided for comparison of site coverage of various buildings in the neighbourhood. Bellevue Court is an example of typical development built in the area in the 1960s. We therefore use Bellevue Court's site coverage to compare with the site coverage of the AH proposal. The site coverage in the AH scheme is 56.03%, while the Bellevue Court existing site coverage is 27.5%, about half of AH's proposal.

This high site coverage is one of the contributory reasons for why AH's redevelopment is looking so visually dense and bulky, and why its upper Block 1 had to be built up to its edge boundaries, as well as the car park building fronting Stubbs being so tall and bulky in size. (see figure 1.1 and V3.6- viewpoint C).

We therefore conclude that AH's coverage is way too excessive in relation to the site coverage of the neighbouring development and therefore must be reduced.

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2.4 Excessive Car Park Provisions

The proposed provision of 184 carparks and 11 loading bays in the proposal is also unacceptably excessive. The additional car parks and loading bays would result in increase in traffic loading in the neighbourhood road system. Lower Stubbs Road, Blue Pool Road and Tai Hang Roads are already very congested at peak used and rush hour time. The excessive provision of 184 car parks and 11 loading bays for service vehicles not only contributes to bulk and density of the development, it also contradicts the Town Planning Board's traffic concerns and the OZP planning intention for the area. (see sections 1.2.4 and 1.2.7.3 above)

Excessive traffic impact was one of the major reasons for the rejection of the previous neighbouring sites' applications to relax the plot ratio and height restriction stipulated by the OZP in 2003.

We therefore conclude that the number of carparking and loading bay is far too excessive and the TPB should not approved such number.

2.5 Undesirable visual impact of the redevelopment on the neighbourhood environment character

Despite the proposed new scheme of May 2020, the street fronting lift tower, the wide elevation of the Block 2, as well as the fully stretched elevation of Block 1 across the entire width of the site, visually present a harsh looking bulk of building fronting Stubbs Road and the neighbourhood. This is especially obvious when we compare the new scheme with the existing round shape of the existing building. For the benefit of the environment, sustainability and preserving the character of the neighbourhood, AH should consider not to add such an excessive number of carparks, refurbished the existing round building instead of demolition and rebuild and redevelop the existing staff quarter building with a smaller Plot Ratio, site coverage and a lower height of building. (see figure 1 and V3.6/- photomontage viewpoint C)

Furthermore, the proposed free standing Lift Tower located at the edge of Stubbs Road in front of Block 2 is a visually dominant and not in character with the visual context of the neighbourhood.

2.6 Preservation of the mature trees not fully considered in drawing

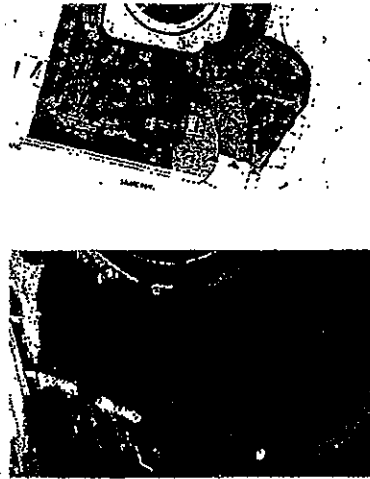
Different from the Jan 2020 scheme, demarcation 1 in the drawing of the new June & Nov 2020 Landscape Proposal (Figure 1), shows that the existing retaining wall to the south (left hand side) of the entrance from Stubbs Road is to be retained and maintained. The drawing also shows that only a small number of existing trees outside AH retaining wall boundary on Stubbs road will be preserved.

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This demarked area does not seem to cover the existing mature trees located inside the retaining wall to the south of the car entrance within the AH boundary, nor the existing mature trees that are currently located on the north (right side) of the entrance. (see photo plate A below)

The location of proposed new Lift tower and Terraced Garden (demarcation 1 & 3 on on Figure 1.1) behind the existing retaining wall on south side of the car entrance as well as the Courtyard Garden (demarcation 2 on Figure 1.1) on the north side of the car entrance would necessitate the felling of most of the existing mature trees in the two areas.

We are of the opinion that felling of these trees would be highly unacceptable in the interest of environmental protection and tree preservation. As the scheme shows insufficient sensitivity and respect to the existing mature trees and the environment, we object to the entrance area design of AH redevelopment plan.



2.1.7 The unreasonably long construction programme

The excessively long project programme stretching over 15 years in 3 phrases for a private redevelopment of its scale is unacceptable to its neighbours.

The pro-longed redevelopment programme would post an inevitable long period of disturbances to the area in terms of nuisance cause by construction noise, dirt and dust pollutions, potential crime and security issues, as well as traffic delays caused by truck deliveries and utility connection works etc.

We are not certain why AH needs such an abnormally long redevelopment time and phasing programme and there is no clear and detailed account of how the development will be physically phased, nor to what extent existing hospital services would be disrupted or suspended during the construction period.

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Whether it is due to reasons such as the complexity of keeping existing hospital services in operation, or technical complexity in implementing the construction work, or due to financial constraints and cash-flow needed to finance the huge cost of site formation and building on their back slope, it all points to the possibility that AH's complex redevelopment is over-sized and over-ambitious.

2.2. Is Adventist Hospital redevelopment plan fully benefit the community at large?

The AH stated that the redevelopment would increase 70% more beds provision to meet the needs of the community.

However, there is no objectively proven evidence that such demand is so large that it renders for the Town Planning Board to approve the relaxation of OZP height restriction which would result in endorsing such a high density of development in the area.

The reasons for our questioning of the over-size, over-ambitious nature of the AH redevelopment proposal is as follows:

2.2.1 Adventist Hospital is high quality but very expensive private hospital, affordable by and benefiting only high-net worth individuals and executives of large companies in the community, and not the general public at large.

2.2.2 The proximity of site location on Hong Kong Island is not short of private hospitals. Examples are:

- A Gleneagles Hospital at lower Nam Fung Road (500 beds)
- B St. Paul's Hospital, with its recently built extension at the bottom of Tai Hang Road (400 beds)
- C HK Sanatorium & Hospital in Happy Valley (480 beds)

In addition, there are also the old private Matilda Hospital at the Peak and Caritas Canossa Hospital in Old Peak Road Central.

2.2.3 In view of the above and the undesirability of AH's over-size proposal, we strongly recommend that AH's project should be cut back to a more reasonable size with plot ratio, site coverage and heights (not to exceed the OZP height) that can commensurate and enhance the character and suburban quality of the neighbourhood.

3.0 Conclusion

The Town Planning Department and Town Planning Board is requested to refrain from approving Adventist Hospital's height limit relaxation application for reasons below:

3.1 The development is excessive in Height, Plot Ratio and Site Coverage, resulting in an excessive building bulk, for reasons outlined in detail in Section 2.1 above.

3.2 The traffic generated by the additional car parking in the new development directly contradicts the very reason why height and plot ratio had to be restricted under the 2003 OZP. The carpark numbers are unacceptably high.

3.3 AH's application report has not given due consideration to the development bulk and its consequential visual impact. It does not respect of the character of the neighbourhood, and has not place consideration on how to conserve the existing mature trees in the area.

3.4 The application has not demonstrated how it would mitigate the potential prolonged nuisance caused by the redevelopment process nor has it outlined how AH's medical operation and services are affected and organised during the phased construction work.

3.5 Adventist Hospital is supposed to be a NGO providing medical service to the community and should not be seen profiting from it. There are plenty of private hospital capacities on Hong Kong Island. Given the context of the site, there is no sound reason for AH to redevelop to such an excessive manner.

3.6 Referring to the Town Planning Board's previous disapproval letter to Bellevue Court's application dated 28 March 2003 (reference TPB/O/S/H14/E-3), approving AH's application to relax height limit is inequitable to all owners in the nearby neighbourhood, whose previous developmental potential had to be reduced, height restricted and sacrificed for the common purpose of conserving the 'mid density' and 'mid-rise' character of the neighbourhood, as well as to avoid over-taxing of traffic on the local road network.

3.7 If the Town Planning Board is to approve AH's current application to relax their OZP height restriction, it would create an undesirable precedent that destroy the integrity of the original planning intention, and potentially open up to challenge through Judicial Review in the future by owners in the neighbourhood.

For and on behalf of:

For and on behalf of
THE INCORPORATED OWNERS
OF BELLEVUE COURT BLOCK A

W. Y. Lee
Director (Development)

The Incorporated Owners
of Bellevue Court Block A

For and on behalf of
THE INCORPORATED OWNERS
OF BELLEVUE COURT BLOCK B

W. Y. Lee
Director (Development)

The Incorporated Owners
of Bellevue Court Block B

For and on behalf of
THE INCORPORATED OWNERS
OF BELLEVUE COURT BLOCK C

W. Y. Lee
Director (Development)

The Incorporated Owners
of Bellevue Court Block C

Date: 30 November 2020

城市規劃委員會

香港北角渣甸道三百三十三號
北角政府合署十五樓

傳真 FAX: 2877 0245 或 2822 8428

電話 Tel: 2231 4810

來電請註明 Your Reference

查詢請註明查詢號碼

In reply please quote this ref.:

TPB/O/S/H14/6-3

28 March 2003

By Registered Post

The Incorporated Owners of Bellevue Court Block A

Bellevue Court

41 Stubbs Road

Hong Kong

(Attn: Ms. Wendy Lee)

Dear Sir/Madam,

Draft The Peak Area Outline Zoning Plan No. S/H14/6
(Objection No. 3)

Pursuant to section 6(3) of the Town Planning Ordinance (the Ordinance), the Town Planning Board (TPB) gave preliminary consideration to your objection to the above Plan at its meeting on 14.3.2003 and decided not to propose any amendment to the above Plan to meet your objection and the reasons are :-

- the two super-tall developments at 41C and 41D Stubbs Road are incompatible with the pre-dominant medium-density and medium-rise development character of the area. The plot ratio and building height restrictions of the "Residential (Group B)1" zone, which covers the objection sites, are to maintain this existing pre-dominant character of the area, to preserve public views and to protect the ridge-line;
- the plot ratio restriction is to avoid overtaxing the local road system. Increase in the development intensity in the uphill area would adversely affect the traffic situation in the downhill area;
- amendments to the Outline Zoning Plan (OZP) exhibited for public inspection is a form of public consultation. Any affected person can object to the amendments and their objections would be considered by the TPB in accordance with the Town Planning Ordinance;
- development restrictions stipulated in the OZP is to reflect the planning intention of the area. Development right of both objection sites under the respective leases would not be affected by the OZP restrictions; and

- 2 -

- the proposed rezoning would create an undesirable precedent, and the cumulative effect of approving similar rezoning would result in adverse traffic impact and would change the medium-rise, medium-density character of the area.

A copy of the TPB Paper for the preliminary consideration of your objection and the relevant extract of minutes of the TPB meeting held on 14.3.2003 are enclosed herewith for your reference.

Should you wish to withdraw your objection, please inform me in writing as soon as possible, preferably within 2 weeks of the date of this letter.

If your objection is not withdrawn, the TPB will further consider your objection under section 6(6) of the Ordinance. Objections No. 3 to 29 to the above Plan will be heard collectively together. You and/or your authorized representative(s) may attend and, if so desired, be heard at the meeting under section 6(6) of the Ordinance, which is to be held on Friday, 6 June 2003 in the Conference Room, 15th Floor, North Point Government Offices, 333 Java Road, North Point, Hong Kong.

Should you wish to submit any further written representations for the hearing of your objection, you are required to make such submission within 4 weeks of the date of this letter. If the written representations include voluminous technical reports, an Executive Summary of preferably not more than 400 words should be provided.

A copy of the paper prepared by the Planning Department for the hearing of your objection by the TPB will be forwarded to you at the above address 7 days before the meeting. A copy each of the Guidance Notes on section 6(6) hearing and Deferral of Consideration of Objections are also attached for your information.

To facilitate arrangement for the meeting, I should be grateful if you would advise me, within 2 weeks of the date of this letter, of the following :-

- the name(s) of the person(s), if any, that will attend the meeting of the TPB; and
- whether you require simultaneous interpretation service at the meeting.

If you wish to seek further clarifications/information on matters relating to the above decision, please feel free to contact Mr. C.S. Chan of Hong Kong District Planning Office at 2231 4935.

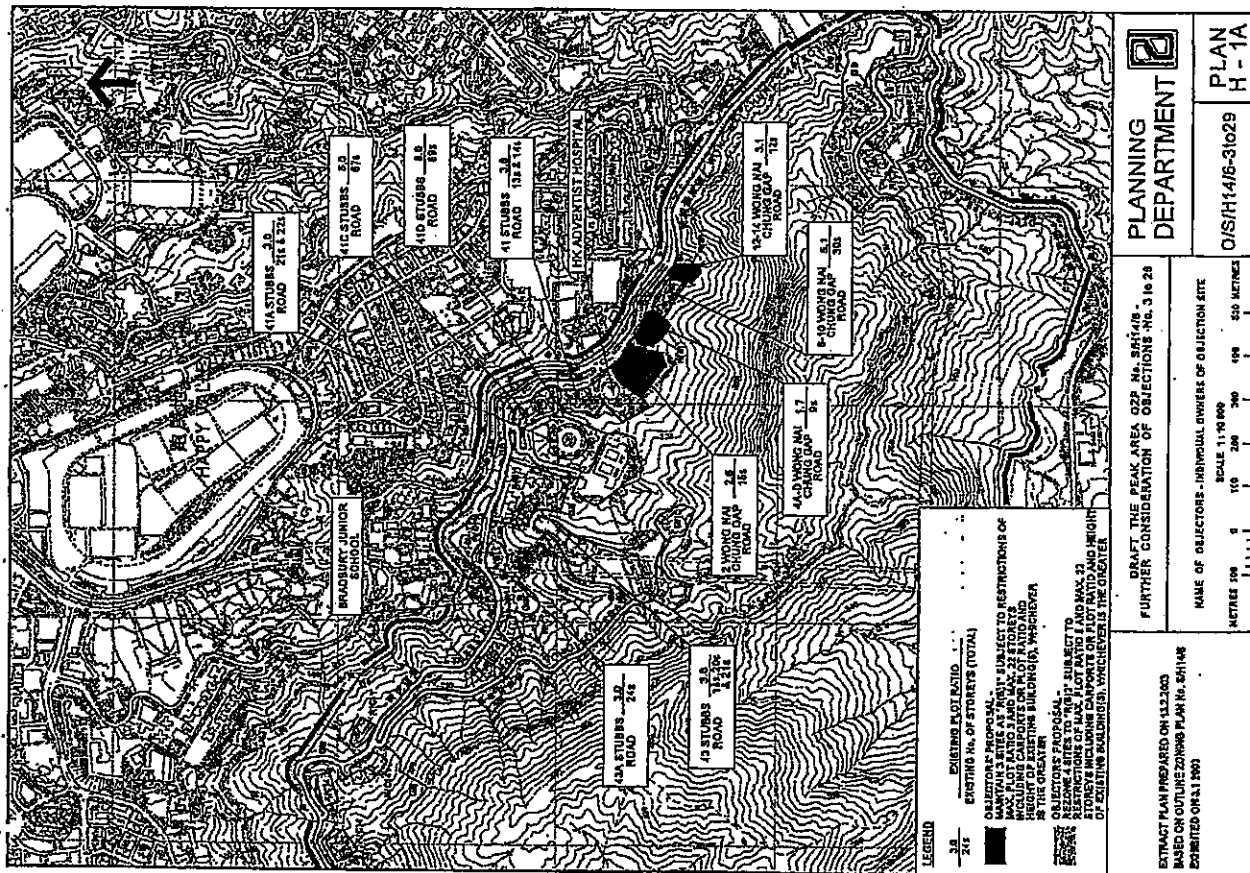
Yours sincerely,



(Mrs. Brenda KWOK)

for Secretary, Town Planning Board

BK/AL/s



25-5

致城市規劃委員會秘書：

事人送返或郵遞：香港北角海邊道333號土角政府合堅15樓

傳真: 2877 0245 或 2522 8426

電郵: tpbpd@pland.gov.hk

To : Secretary, Town Planning Board

By hand or post : 15/F, North Point Government Offices, 333 Java Road, North Point, Hong Kong

By Fax : 2877 0245 or 2522 8426

By e-mail: tpbpd@pland.gov.hk

有關的規則申請編號 The application no. to which the comment relates

A/H14/82 Received on 16/07/2020

意見詳後(如有需要,請另頁說明)

Details of the Comment (use separate sheet if necessary)

- * Excessive Heights - Plot Ratio, Site Coverage is incompatible with the Mid-density, mid-rise character of the neighbourhood.
 - * Excessive Car Park provisions (89% + 11 loading bays) will generate additional loading to roads in the proximity (eg. St. Ed's Plaza, Padi Road & Tai Hing Rd etc.)
 - * Excluding Native Trees at entrance of Adventist Hospital - entrance marks to be preserved
 - * Proposed Lift Tower and the falls of trees not acceptable in terms of environment
 - * Caricaturing playground is unacceptably low (well below nuisance) preservation
 - * Allowing the scheme to go ahead will cap preservation that caribou planning intends Intention of the OZP
- 「提意見人」姓名/名稱: Name of person/company making this comment: Frankie Maister

簽署 Signature

[Signature]

Birth Date

•

* Approving. Adventist Hospital scheme is inequitable, to other owners in the neighborhood whose development potentials have to be limited by restriction to "Existing Buildings" only. It will be open to challenge legally, due to its unfair restrictions on other developments in the neighborhood and not on Adventist Hospital's site.

* There is no need ^(for additional hospitals) to develop so excessively as there are plenty of private hospitals bed-spaces in the proximity: Theravong Sanmitayum Hospital; St. Paul's Hospital; Matula Hospital; Glenn Eagle Hospital; Cannas Hospital etc.

Seq 5-53 [redacted]

Seq 5-53

致城市規劃委員會秘書：

本人送遞郵遞香港北角渣甸道 333 號北角政府合署 15 樓

傳真：2877 0245 或 2522 8426

電郵：tpbpd@pland.gov.hk

To : Secretary, Town Planning Board

By hand or post : 15/R, North Point Government Offices, 333 Java Road, North Point, Hong Kong

By Fax : 2877 0245 or 2522 8426

By e-mail : tpbpd@pland.gov.hk

☐ Urgent ☐ Return receipt ☐ Sign ☐ Encrypt ☐ Mark Subject Restricted ☐ Expand personal/public groups



Application A/H14/82 - Height Relaxation - Adventist Hospital
17/01/2021 19:39

From: [redacted]
To: tpbpd@pland.gov.hk
Cc: [redacted]
FileRef: [redacted]

2 attachments

Bellevue_Comments_Jan_2021.pdf Bellevue_Comments_Nov_2020.pdf

有關的規劃申請編號 The application no. to which the comment relates

A/H14/82 Received on 21/12/2020

意見詳情 (如有需要，請另頁說明)

Details of the Comment (use separate sheet if necessary)

Our objection and detailed comments are submitted earlier
on 23 May 2020, 9 July 2020, 10 Aug 2020 and 30 Nov 2020
to the Town Planning Board after stand.

「提意見人」姓名/名稱 Name of person/company making this comment

簽署 Signature 日期 Date 17 Jan 2021

For and on behalf of
THE INCORPORATED OWNERS OF BELLEVUE COURT BLOCK A
THE INCORPORATED OWNERS OF BELLEVUE COURT BLOCK B
THE INCORPORATED OWNERS OF BELLEVUE COURT BLOCK C
[Signature] [Signature] [Signature]
[Signature] [Signature] [Signature]

Dear Sir/Madam,
We refer to your letter (ref: TPB/A/H14/82) dated 29 December 2020 sent to the Incorporated Owners of Bellevue Court Block A, B and C. We enclosed herewith our comments.

For your reference, we are also attaching our comments submitted November 2020.

Sincerely yours,

For and on behalf of

The Incorporated Owners of Bellevue Court Block A, B and C.

Wendy Lee

Tel - [redacted]

致城市規劃委員會秘書：

專人送遞或郵遞：香港北角渣華道 333 號北角政府合署 15 樓

傳真：2877 0245 或 2522 8426

電郵：tpbpd@pland.gov.hk

To : Secretary, Town Planning Board

By hand or post : 15/F, North Point Government Offices, 333 Java Road, North Point, Hong Kong

By Fax : 2877 0245 or 2522 8426

By e-mail : tpbpd@pland.gov.hk

有關的規劃申請編號 The application no. to which the comment relates

A/H14/82 Received on 21/12/2020

意見詳情 (如有需要，請另頁說明)

Details of the Comment (use separate sheet if necessary)

Our objection and detailed comments we submitted earlier on 23 May 2020, 9 July 2020, 10 Aug 2020 and 30 Nov 2020 to the Town Planning Board still stand.

「提意見人」姓名/名稱 Name of person/company making this comment

簽署 Signature

日期 Date 17 Jan 2021

For and on behalf of
THE INCORPORATED OWNERS OF BELLEVUE COURT BLOCK A
W. Y. Yip
Authorized Signatory

For and on behalf of
THE INCORPORATED OWNERS OF BELLEVUE COURT BLOCK C
W. Y. Yip
Authorized Signatory

致城市規劃委員會秘書：

專人送遞或郵遞：香港北角渣華道 333 號北角政府合署 15 樓

傳真：2877 0245 或 2522 8426

電郵：tpbpd@pland.gov.hk

To : Secretary, Town Planning Board

By hand or post : 15/F, North Point Government Offices, 333 Java Road, North Point, Hong Kong

By Fax : 2877 0245 or 2522 8426

By e-mail : tpbpd@pland.gov.hk

有關的規劃申請編號 The application no. to which the comment relates

A/H14/82 Received on 02/11/2020

意見詳情 (如有需要，請另頁說明)

Details of the Comment (use separate sheet if necessary)

Please see Supplementary Sheet (Rev. 3) attached herewith

「提意見人」姓名/名稱 Name of person/company making this comment The Incorporated Owners of Bellevue Court Blocks A, B & C

簽署 Signature see below

日期 Date 30 Nov 2020

For and on behalf of
THE INCORPORATED OWNERS OF BELLEVUE COURT BLOCK A
W. Y. Yip
Authorized Signatory

For and on behalf of
THE INCORPORATED OWNERS OF BELLEVUE COURT BLOCK A
W. Y. Yip
Authorized Signatory

To: the Planning Department, North Point Government Offices, 333 Java Rd., Hong Kong

Objection of Adventist Hospital's application for Minor Relaxation of Building Height Relaxation for Permitted Hospital Use, 40 Stubbs Road, Hong Kong (Planning Application A/H14/82) - with submission of further information by applicant, 2 Nov 2020.

Details of Comments / Objection submitted By The Incorporated Owners of Bellevue Court Block A, B & C, (Supplementary Sheet)

We refer to the above Planning Application (A/H14/82) and your original Statutory notice issued by the Town Planning Board dated 21 January 2020, to our 3 respective Incorporated Owners of Bellevue Blocks A, B & C.

We also refer to our subsequent objection letters dated 8th February 2020 in response to the above notice, as well as our subsequent objection letters in 9th July 2020, to submissions of further information by Adventist Hospital on 12th June 2020, 16th July 2020.

In response to your latest letter to us dated 10th Nov 2020, we write again to reiterate our objection to Adventist Hospital's (AH) application for Building Height Relaxation and its resulting over-development of the hospital.

Summary Statement of Bellevue Court's Objection:

AH over-sized development and traffic generated by it would create an adverse and detrimental impact on the original planning intention of conserving the mid-density and mid-rise character of the neighbourhood. It would create traffic over-loading on the already strained lower Stubbs Road, Blue Pool Road and Tai Hang Road. It would also cause negative environmental impacts to the neighbourhood, including inadequate regards to preserve existing mature trees in the area, and potential noise and dust nuisance caused by the unreasonably long redevelopment time-line proposed by AH.

In addition, the existing OZP has imposed a blanket restriction in all future redevelopments in terms of plot ratio and height in the neighbourhood area to "existing bulk" only. Any relaxation of restriction by the Town Planning Board to the Adventist Hospital site would be considered as very unfair to other owners in the area whose future redevelopments are restricted by the OZP to existing Plot Ratio and Heights only.

If the AH application is approved by the Town Planning Board, it would set undesirable and unfair precedence which is opened to legal challenge by owners and potential developers intending to redevelop the existing buildings in the future.

1.0 Key observations of AH's proposed redevelopment scheme are as follows:

1.0.1 AH's newly revised proposal of Nov 2020 submitted to the Town Planning comprises of 2 blocks (Block 1 and 2) instead of 3 blocks in the original February scheme. A & B blocks as proposed in the Jan 2020 submission have been combined into Block 1 in the latest (Nov 2020) plan, and previous Block C is now Block 2.

1.0.2 AH has applied for Planning Permission to relax the existing OZP compliance height restriction (190.518m above PD) by 22.4m, when measured to the proposed Block 1 plant room at 212.918m PD; and, 17.65m measured from their Block 1 roof level at 208.168m PD.

1.0.3 In AH's May 2020 scheme, proposed height of Block 2 is 176m PD to Green roof level and and 171.3 PD to main roof level. The OZP compliance height for this Block is 165m PD and therefore the height relaxation applied is 11m for their upper roof level and 6.3m for their main roof level.

1.0.4 In other words, the height proposed and relaxation applied for in the last scheme in May 2020 is the same as the current Nov scheme.

1.0.5 Proposed Plot ratio of 5.59 (same as Jan & May 2020 proposal)

1.0.6 Site Coverage of 56.03% (same as Jan & May 2020 proposal)

1.0.7 A total number of car parking spaces in the recent Nov scheme is 184 cars park (same as Jan, Jun & July 2020 proposals). However, the 7 lay-bys for loading/unloading of taxis, ambulances, light buses etc. of the previous schemes have been further increased to 11 nos in the Nov 2020 proposal.

1.0.8 Different from the Jan 2020 scheme, demarcation 1 in the drawing of the new July 2020 and Nov 2020 Landscape Proposals (Figure 1.1), both show that the existing retaining wall to the south (left side) of the entrance from Stubbs Road is to be partially retained and partially reduced by demolishing its top section (Figure 3.6 bottom photo).

1.0.9 Figure 1 shows that neither the existing mature trees located inside and along the retaining wall to the south of the car entrance, nor the existing mature trees currently located on the north (right side) of the will be preserved. (see also photo plate A in section 2.6 below)

1.0.10 The location of proposed new lift tower and Terraced Garden (demarcation 1 & 3 on Figure 1.1) behind the existing retaining wall on south side of the car entrance as well as the Courtyard Garden (demarcation 2 on Figure 1.1) on the north side of the car entrance would necessitate the felling of most of the existing mature trees in the two areas.

1.1 Bellevue Court's 2003 Objection to the Outline Zoning Plan (OZP) No. S/H14/16

Historical Background & previous Planning Decisions made by the TPB

1.1.1 In 2003, Town Planning Department's Peak Area OZP imposed an "Existing Bulk" restriction of plot ratio (i.e. future redevelopment to be no more than what is existing in a development) and upper limit of building heights to "existing building heights" to all 7 numbers of R(8)1 sites along Wong Nai Chung Gap Road and Upper Stubbs Road in the neighbourhood. Bellevue Court was one of the sites affected.

1.1.2 Individual owners and the Incorporated Owners Bellevue Court, alongside with other site owners in the neighbourhood submitted objections of the draft OZP to the Town Planning Board.

1.1.3 Bellevue Court's reasons for their objection were that majority of the restricted sites in the area were over 40 to 50 years old and were due for redevelopment. The newly Imposed Height and Plot Ratio restrictions would practically dampen any future potential developer's interest and incentive in redeveloping the sites affected by the OZP.

1.1.4 Furthermore, owners of Bellevue Court argued that it was inequitable for the government to have allowed 2 towers at 41C and 41D Stubbs Road to build to high plot ratios (to 5 and 8 respectively) and to excessively tall heights of 67 & 69 storeys (likewise, Nicholson Tower, was also permitted in the past to build up 30 storeys and to a plot ratio of 5.1.), and then afterwards harshly restricted Plot Ratio of the remaining 7 sites to existing bulk and heights.

1.2 Town Planning Board rejected Bellevue Court's objection to the "Existing-Bulk restriction" Imposed by the 2003 Outline Zoning Plan

1.2.1 At a TPB meeting held on the 14th March 2003, Bellevue Court's and various neighbourhood owners' objections were rejected. The following are grounds of their rejection in their reply letters (See Attachment A - letter from Town Planning Board to the Incorporated Owners of Bellevue Court Block A - Ref. TPB/O/S/H14/6-3)

1.2.1.1 The two "super-tall" towers at 41C and 41D Stubbs Road were incompatible with the pre-dominant medium density and medium-rise development character of the area.

1.2.1.2 TPB explained that the restrictions of Plot Ratio and Heights (to existing bulk) on the R(8)1 zone sites (including Bellevue Court) were to "maintain this existing pre-dominant character of the area", and to "preserve public views" and to "protect the skyline" (behind the buildings)

1.2.1.3 The plot ratio restriction is "to avoid overtaxing the local road system". Increase development intensity in the uphill area "would adversely affect the traffic in the downhill area".

1.2.1.4 Development restrictions stipulated in the OZP is "to reflect the planning intention of the area".

1.2.1.5 Proposed Rezoning (by Bellevue Court and other objectors) proposed an alternative higher plot ratio and height limit would create an undesirable precedent. The cumulative effect of approving similar rezoning would result in adverse traffic impact and would change the medium rise, medium density character of the area.

1.2.2 In summary, the Planning Intentions behind the Outline Zoning Planning as endorsed by the Town Planning Board's meeting and subsequent hearings, can be clearly summarised as follows:

1.2.2.1 The super-tall developments of the Summit & Highcliff (41C and 41D Stubbs Road respectively (and by implication should include also the 30 storey towers of Nicholson Tower) are considered incompatible with development character of the area.

1.2.2.2 Development restrictions (of Plot Ratios and Heights) stipulated in the OZP is to reflect the planning intention of the area, which is to maintain the pre-dominant medium density and medium-rise character of the area, to preserve public view and to protect the ridge line (of the hill behind)

1.2.2.3 The OZP plot ratio restrictions is also to avoid overtaxing the local road system. Increase in development intensity would adversely affect the traffic downhill from the subject area.

1.3 Development details of the existing sites in the neighbourhood

Sites	Ex. Plot Ratio	Ex. Height (storeys)
41 Stubbs Rd (Bellevue Court)	3.8	13s & 14s
41D Stubbs Rd * (Highcliff)	8.0 *	69s
41C Stubbs Rd * (The Summit)	5.0 *	67s
41A Stubbs Rd (Villa Monte Rosa)	3.0	21s & 22s
43 Stubbs Rd (Evergreen Villa)	3.0	18s, 20s, 21s

43A Stubbs Rd (Victoria Heights)	3.0	24s
2 Wong Nai Chung Gap Rd (Woodland Heights)	2.6	16s
4A-D Wong Nai Chung Gap Rd (Valley View)	1.7	9s
<u>6-10 Wong Nai Chung Gap Rd** (Nicholson Tower)</u>	<u>5.1**</u>	<u>30s</u>
12-14 Wong Nai Chung Gap Rd (Leon Court)	3.1	12s

* Town Planning Board considered Plot Ratio excessive and incompatible with neighbourhood's mid-density, mid-rise character.

** This should also be considered incompatible with neighbourhood character as it is 30 storeys tall

- 2.2. **Excessive Plot Ratio**
- It should be noted that the lifting of AH's height restriction not only would result in their new development protruding above its two neighbour buildings, it would indirectly result in enabling AH's scheme to achieve a plot ratio of 5.59 for their development.
- Referring to Table 1.3 above, apart from the 2 tall towers of Highcliff (plot ratios of 8 with 69 storeys) and The Summit (plot ratio 5 with 67 storeys), as well as Nicholson Tower (plot ratio 5.1 of 50 storeys), the majority of the plot ratio restrictions of the remaining residential buildings sites along the neighbouring stretch of Stubbs Road and Wong Nai Chung Gap Road ranges from 1.7 to 3.8, with an average of 2.89.
- This high plot ratio, together with the extra height and site coverage discussed below, will collectively contributed to the visual bulk of the hospital building if approved. (see application document: figure V3.3/- viewpoint C).
- AH's proposed plot ratio of 5.59 is double the average in the area and therefore too excessive for the area. Considering that the original planning intention of the OZP is to maintain the Mid-rise and Mid-density character of the neighbourhood, AH's scheme is clearly contradicting the OZP planning intention.
- The scheme should not be approved unless we see a reduction of its plot ratio, height and site coverage compatible with other sites in the area.
- 2.3. **Excessive Site Coverage**
- In the AH planning application document, there is no data provided for comparison of site coverage of various buildings in the neighbourhood. Bellevue Court is an example of typical development built in the area in the 1960s. We therefore use Bellevue Court's site coverage to compare with the site coverage of the AH proposal. The site coverage in the AH scheme is 56.03%, while the Bellevue Court existing site coverage is 27.5%, about half of AH's proposal.
- This high site coverage is one of the contributory reasons for why AH's redevelopment is looking so visually dense and bulky, and why its upper Block 1 had to be built up to its edge boundaries, as well as the car park building fronting Stubbs being so tall and bulky in size. (see figure 1.1 and V3.6- viewpoint C).
- We therefore conclude that AH's coverage is way too excessive in relation to the site coverage of the neighbouring development and therefore must be reduced.

- 2.0 **Detail grounds of Bellevue Court's Objections**
- 2.1 **Objection to AH's application for Relaxation of Height Restrictions**
- AH's current Planning application is to ask the TPB for permission to relax the OZP height restriction from 190.518 m PD to 212.918 PD (22.4m higher) on their redevelopment plan, adding some 5 storeys of hospital floors above the existing height limit. This is equivalent to 6 to 7 storeys of a domestic buildings.
- Bellevue Court, immediate neighbour AH's site on the north, is subject to OZP height restriction to its existing height of 189.42 m PD (measured to highest roof level). AH application to relax and increase their height restriction, if approved, shall be 23.45m above the maximum height of Bellevue Court, meaning that AH height would be about 7 domestic storeys higher than Bellevue Court.
- Woodland Height, neighbour to AH's south boundary, is also subject to OZP height restriction. According to AH's planning application document, it has an existing max. height restriction of 195m PD. Consequently, AH's proposed new height of 212.918 m PD will be 17.918m higher than Woodland Height, which is equivalent to about 5.56 domestic storeys higher than Woodland Heights.
- In other words, AH's application to relax the OZP height restriction compliance would result in its redevelopment protruding dominantly above its neighbouring development.
- The plot ratio of 5.59 and a site coverage of 56.03% have contributed to the excessive bulk and height of Block 1 of the proposed hospital. In view of the OZP's original planning intention of maintaining mid-rise, medium density character of the neighbourhood, as well as the potential severe traffic concern mentioned in section 1.2.7.1 to 1.2.7.3 above, the application to relax AH's height restriction is too excessive and should be disapproved.

2.4 Excessive Car Park Provisions

The proposed provision of 184 carparks and 11 loading bays in the proposal is also unacceptably excessive. The additional car parks and loading bays would result in increase in-traffic loading in the neighbourhood road system. Lower Stubbs Road, Blue Pool Road and Tai Hang Roads are already very congested at peak used and rush hour time. The excessive provision of 184 car parks and 11 loading bays for service vehicles not only contributes to bulk and density of the development, it also contradicts the Town Planning Board's traffic concerns and the OZP planning intention for the area. (see sections 1.2.4 and 1.2.7.3 above)

Excessive traffic impact was one of the major reasons for the rejection of the previous neighbouring sites' applications to relax the plot ratio and height restriction stipulated by the OZP in 2003.

We therefore conclude that the number of carparking and loading bay is far too excessive and the TPB should not approved such number.

2.5 Undesirable visual impact of the redevelopment on the neighbourhood environment character

Despite the proposed new scheme of May 2020, the street fronting lift tower, the wide elevation of the Block 2, as well as the fully stretched elevation of Block 1 across the entire width of the site, visually present a harsh looking bulk of building fronting Stubbs Road and the neighbourhood. This is especially obvious when we compare the new scheme with the existing round shape of the existing building. For the benefit of the environment, sustainability and preserving the character of the neighbourhood, AH should consider not to add such an excessive number of carparks, refurbished the existing round building instead of demolition and rebuild and redevelop the existing staff quarter building with a smaller Plot Ratio, site coverage and a lower height of building. (see figure 1 and V3.6/-photomontage viewpoint C)

Futhermore, the proposed free standing Lift Tower located at the edge of Stubbs Road in front of Block 2 is a visually dominant and not in character with the visual context of the neighbourhood.

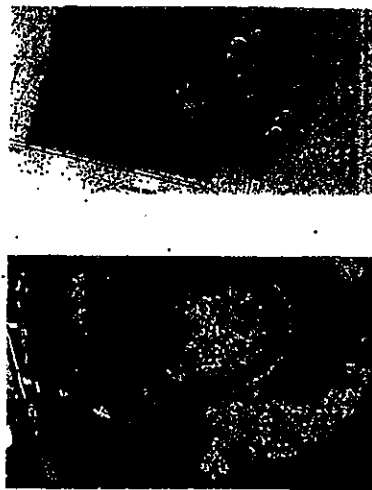
2.6 Preservation of the mature trees not fully considered in drawing

Different from the Jan 2020 scheme, demarcation 1 in the drawing of the new June & Nov 2020 Landscape Proposal (Figure 1), shows that the existing retaining wall to the south (left hand side) of the entrance from Stubbs Road is to be retained and maintained. The drawing also shows that only a small number of existing trees outside AH retaining wall boundary on Stubbs road will be preserved.

This demarked area does not seem to cover the existing mature trees located inside the retaining wall to the south of the car entrance within the AH boundary, nor the existing mature trees that are currently located on the north (right side) of the entrance. (see photo plate A below)

The location of proposed new Lift tower and Terraced Garden (demarcation 1 & 3 on on Figure 1.1) behind the existing retaining wall on south side of the car entrance as well as the Courtyard Garden (demarcation 2 on Figure 1.1) on the north side of the car entrance would necessitate the felling of most of the existing mature trees in the two areas.

We are of the opinion that felling of these trees would be highly unacceptable in the interest of environmental protection and tree preservation. As the scheme shows insufficient sensitivity and respect to the existing mature trees and the environment, we object to the entrance area design of AH redevelopment plan.



2.1.7 The unreasonably long construction programme

The excessively long project programme stretching over 15 years in 3 phrases for a private redevelopment of its scale is unacceptable to its neighbours.

The pro-longed redevelopment programme would post an inevitable long period of disturbances to the area in terms of nuisance cause by construction noise, dirt and dust pollutions, potential crime and security issues, as well as traffic delays caused by truck deliveries and utility connection works etc.

We are not certain why AH needs such an abnormally long redevelopment time and phasing programme and there is no clear and detailed account of how the development will be physically phased, nor to what extent existing hospital services would be disrupted or suspended during the construction period.

Whether it is due to reasons such as the complexity of keeping existing hospital services in operation, or technical complexity in implementing the construction work, or due to financial constraints and cash-flow needed to finance the huge cost of site formation and building on their back slope, it all points to the possibility that AH's complex redevelopment is over-sized and over-ambitious.

- 2.2. Is Adventist Hospital redevelopment plan fully benefit the community at large?
- The AH stated that the redevelopment would increase 70% more beds provision to meet the needs of the community.

However, there is no objectively proven evidence that such demand is so large that it renders for the Town Planning Board to approve the relaxation of OZP height restriction which would result in endorsing such a high density of development in the area.

The reasons for our questioning of the over-size, over-ambitious nature of the AH redevelopment proposal is as follows:

2.2.1 Adventist Hospital is high quality but very expensive private hospital, affordable by and benefiting only high-net worth individuals and executives of large companies in the community, and not the general public at large.

2.2.2 The proximity of site location on Hong Kong Island is not short of private hospitals. Examples are:

- A Gleneagles Hospital at lower Nam Fung Road (500 beds)
- B St. Paul's Hospital, with its recently built extension at the bottom of Tai Hang Road (400 beds)
- C HK Sanatorium & Hospital in Happy Valley (480 beds)

In addition, there are also the old private Matilda Hospital at the Peak and Caritas Canossa Hospital in Old Peak Road Central.

2.2.3 In view of the above and the undesirability of AH's over-size proposal, we strongly recommend that AH's project should be cut back to a more reasonable size with plot ratio, site coverage and heights (not to exceed the OZP height) that can commensurate and enhance the character and suburban quality of the neighbourhood.

3.0 Conclusion

The Town Planning Department and Town Planning Board is requested to refrain from approving Adventist Hospital's height limit relaxation application for reasons below:

3.1 The development is excessive in Height, Plot Ratio and Site Coverage, resulting in an excessive building bulk, for reasons outlined in detail in Section 2.1 above.

3.2 The traffic generated by the additional car parking in the new development directly contradicts the very reason why height and plot ratio had to be restricted under the 2003 OZP. The carpark numbers are unacceptably high.

3.3 AH's application report has not given due consideration to the development bulk and its consequential visual impact. It does not respect of the character of the neighbourhood, and has not place consideration on how to conserve the existing mature trees in the area.

3.4 The application has not demonstrated how it would mitigate the potential prolonged nuisance caused by the redevelopment process nor has it outlined how AH's medical operation and services are affected and organised during the phased construction work.

3.5 Adventist Hospital is supposed to be a NGO providing medical service to the community and should not be seen profiting from it. There are plenty of private hospital capacities on Hong Kong Island. Given the context of the site, there is no sound reason for AH to redevelop to such an excessive manner.

3.6 Referring to the Town Planning Board's previous disapproval letter to Bellevue Court's application dated 28 March 2003 (reference TPB/O/S/H14/6-3), approving AH's application to relax height limit is inequitable to all owners in the nearby neighbourhood, whose previous developmental potential had to be reduced, height restricted and sacrificed for the common purpose of conserving the 'mid density' and 'mid-rise' character of the neighbourhood, as well as to avoid over-taxing of traffic on the local road network.

3.7 If the Town Planning Board is to approve AH's current application to relax their OZP height restriction, it would create an undesirable precedent that destroy the integrity of the original planning intention, and potentially open up to challenge through Judicial Review in the future by owners in the neighbourhood.

For and on behalf of:

THE INCORPORATED OWNERS OF BELLEVUE COURT BLOCK A

[Signature]
The Incorporated Owners of Bellevue Court Block A

THE INCORPORATED OWNERS OF BELLEVUE COURT, BLOCK B

[Signature]
The Incorporated Owners of Bellevue Court Block B

The Incorporated Owners of Bellevue Court Block C

Date: 30 November 2020

申請編號 Application No.: A/H14/82

與申請地點/處所有關的先前申請
Previous Applications Covering the Application Site/Premises

申請編號 Application No.	建議用途/發展 Proposed Use/Development	城市規劃委員會的決定(日期) Decision of Town Planning Board (Date)
	沒有 Nil	

有關資料是為方便市民大眾參考而提供，對於所載資料在使用上的問題及文義上的歧異，城市規劃委員會概不負責。若有任何疑問，應查詢時段人提交的文件。

The information is provided for easy reference of the general public. Under no circumstances will the Town Planning Board accept any liabilities for the use of the information nor any inaccuracies or discrepancies of the information provided. In case of doubt, reference should always be made to the submission of the applicant.

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RECEIVED

Incorporated Owners of Woodland Heights
2 Wong Nai Chung Gap Road, Hong Kong

HY-WH-12021-005

The Secretary of Town Planning Board
c/o Planning Department
North Point Government Offices
333 Java Road, North Point
Hong Kong

Dear Sirs,

Proposed Minor Relaxation of Building Height Restriction for Permitted Hospital Use
40 Stubbs Road, Hong Kong

(Application No A/H14/82 – Further Information by Applicant Issued 18 Dec 2020 to Public Enquiry)
Comments and Objections from Woodland Heights, 2E Wong Nai Chung Gap Road

Thank you for your recent letter on 29 Dec 2020 providing further information from the Adventist Hospital ("the Hospital"), in response to our opinion issued in Feb, June, July, Aug, Dec 2020 to the captioned.

We noted that there are changes in the revised design where building corners are made rounded, frontage of Block 1 is made terraced and height of Lift Tower is reduced but the whole massing of blocks remains unchanged, we thus appeal to the Town Planning Board to reject the Hospital application since these changes nor their previous deliberation still fails to merit the relaxation in building heights as called for at the approved Outline Zoning Plan ("OZP").

Document references:

1. our letters dated 22 February 2020, 2 June, 12 July 2020, 14 Aug 2020, 1 Dec 2020 and 22 Dec 2020
2. the application from the Hospital dated Dec 2019 and supplementary information on 18 Dec 2020, 23 Nov 2020, 14 July 2020, 10 Jun 2020, 10 Nov 2019.

Basis of Objection

We do not find the deliberation of Hospital sufficient to address our concerns for the following reasons:

1. It shies away from our previous response on 1 Dec 2020;
2. It is bias in the approach.

Shir away from our comments on 1 Dec 2020

In our previous letter on the 1 Dec 2020, we highlighted the general presumption in the OZP when dealing with buildings which had already exceeded height restriction and the paradox of referring Building Ordinance in the planning application. We also emphasised how the proposed design of the new Hospital blocks contravened the planning guidelines and protest against infringement of proportionate right and damage to status quo of neighborhood.

However none of these are addressed in the current response. The current response which stated to have addressed to public comments from 10 November 2020 to 1 December 2020 were in fact repeating word by word their previous response to our earlier comment and to some of which we have already disputed about. We listed them out as follows:

	Knight Frank Current response 18 Dec 2020	Knight Frank Response 30 Oct 2020 (Attachment II)
1.	Excessive of parking facilities	Repeating No 5 of the above response
2.	Development period	Repeating No 6 ditto
3.	Need for Expansion	Repeating No 7 ditto
4.	In Contravene of the planning intention	Repeating No 8 ditto
5.	Building Height restriction	Repeating No 11 ditto
6.	Site coverage	Repeating No 12 ditto
7.	Visual Incompatibility	Repeating No 14 ditto
8.	Tree preservation	Repeating No 16 ditto

We believe the replication is inadvertent and look forward to receiving further response in this regard.

Bias argument

The Hospital buildings which were completed from 1971 to 1979 were planned before the first version of the Draft Peak Area zoning plan (LH14/20) in 1973. Despite there was a general concern to maintain the medium rise character of the area at the zoning plan, the historic status were honored. Thus in the making of the zoning plan, the height restriction of Hospital took reference to the existing height for the buildings built or approved at the time but in parallel left remarks for future redevelopment. These remarks which restrict building heights were elaborated at paragraphs 7.3, and more specifically at 8.4.6 and 8.4.8 of the explanatory notes to the OZP. (same paragraph reference adopt for the rest of this letter)

Without prejudice to the above restriction, the OZP is also flexible towards minor relaxation in building height but the applicant has to exchange it by advocating design which bring advancement to the local, e.g. building separation and air permeability, and to the area e.g. urban design without adverse landscape and visual impact as stated in the paragraphs 7.4(a) to 7.4 (f). All these criteria therein mentioned are complementary. Furthermore and as mentioned earlier in last section, when the existing height has already exceeded the height restriction, as for the case of the Hospital now, there is a general presumption against further relaxation according to paragraph 7.5 so the betterment has to be overwhelmingly strong.

Based on the above proviso in the OZP, we thus find the deliberation from the Hospital bias in two aspects. First it chooses to ignore the height restrictions and second it falls to consider ALL the criteria that merit relaxation. The first aspect is obvious. As for the second one, there are 6 criteria (7.4 (a) to (f)) altogether, absence of one would weaken the prospect of a conclusion. In our view, an approach of glossing over certain criteria e.g. air, visual permeability and visual impact but sweetening the other e.g. better streetscape is clearly flawed.

This selective approach also applies to traffic. As per paragraph 5.4, the road capacities to this area are limited and hence the development intensity must be maintained at the existing level to avoid overloading

to the area. It is thus that a reserved view should be adopted and conditioned upon when granting permission for redevelopment, least to say for a minor relaxation of building height. However, the approach did not factor this planning aspect and jump the gun to the next-in-the-sequence comfort ground of traffic study which may favour the application.

We put statistic figures in the traffic study aside and come to reality, in the morning and afternoon sessions, we avoid taking the Stubbs Road downhill because of traffic. If the current hospital scheme asking for relaxation of building height for 18 m out of 46 m, that is almost 1/3 of the existing height (Height restriction 190mPD – existing 144mPD = 46m; new height 208mPD – 190mPD = 18m). We consider the deliberation twists the stretches the meaning of “minor” to its farthest end and could not possibly concur with the view that the lift in height is minor.

Conclusion

We are writing to invite Town Planning Department to review the Hospital application with a fair view according to Wednesbury's principle in coming to a reasonable decision where only true and full intention of the OZP are considered. Please put these concerns and objections on record, and we would appreciate your response. Should you have any queries, please do not hesitate to contact us.

Yours faithfully,

For and on behalf of

Incorporated Owners of Woodland Heights (Wong Nai Chung Gap Road)


Kevin Lo, Chairman

Douglas Van, Vice Chairman

Carl Lu, Secretary

Cc: Mr Ivan Wong, Councillor, Wan Chai District Council

Seg 7 5-55

Incorporated Owners of Woodland Heights
2 Wong Nai Chung Gap Road, Hong Kong

26 Feb 2021

The Secretary of Town Planning Board
c/o Planning Department
North Point Government Offices
333 Java Road, North Point
Hong Kong

Dear Sirs,

Proposed Minor Relaxation of Building Height Restriction for Permitted Hospital Use
40 Stubbs Road, Hong Kong
(Application No A/H14/82 – Further Information by Applicant Issued 28 Jan 2021 to Public Enquiry)
Comments and Objections from Woodland Heights, 2E Wong Nai Chung Gap Road

Thank you for your letter on 5 Feb 2021 inviting our comment to the captioned.

Your letter referred to further information from the Adventist Hospital ("the Hospital"), in response to queries from

1. Transport Department ("TD"),
2. Drainage Service Department ("DSD") and
3. Architectural Services Department (ArchSD).

On this, we would like to give our view on certain points for your consideration before you table the application to Town Planning Board ("TPB") decision.

Document reference:

1. our letters dated 22 February 2020, 2 June, 12 July 2020, 14 Aug 2020, 1 Dec 2020 and 22 Dec 2020, 19 Jan 2021
2. the application from the Hospital dated Dec 2019 and supplementary information on 18 Dec 2020, 23 Nov 2020, 14 July 2020, 10 Jun 2020, 10 Nov 2019, 21 Dec 2020.

Our view on Hospital's Response

Hospital's Response To comments from TD



1

TD requested the Hospital to consider providing more loading and unloading bays ("UL") for taxi/private cars towards upper end of the requirements stipulated in the Hong Kong Planning Standards and Guidelines ("HKPSG"). The request was meant to reduce long queue of cars at the Hospital entrance waiting for loading/unloading passengers. The Hospital rejected the request and considered it would not be feasible technically and would be way beyond the actual demand and operational needs. As a result, 5 laybys was proposed to meet the minimum requirement of the HKPSG.

Laybys are spaces for cars driving in and out with short stay, conversely carparks or waiting areas are meant for longer stay. The same HKPSG also has the carpark requirement which ties up services of hospitals with their sitings and nearby transport facilities. Now the Hospital is sited at the hubs of transport served by at least 10 public bus routings and 3 minibus routings and is around 20m from a roundabout of 3 trunk roads, it should be easily accessible and the need for large number of car parks is accordingly not pressing. Based on the proposed redevelopment parameter of 65 consultation rooms and 231 hospital beds, the Hospital has to provide at least 85 but not more than 175 carparks. We except the working again from our letter dated 14 July 2020:

Notes for design requirement:

- 1 car parking space per 3 to 12 beds and 1 to 1.5 space per consultation room.
- Lower limit = $20 + 65 \div 85$ (231 + 12 = 20 ; $65 \times 1 = 65$) ;
- Upper limit = $77 + 98 \div 175$ (231 + 3 = 77 ; $65 \times 1.5 = 98$)

If the Hospital adopts the lower end, there is a reduction of 90 car parks, (175 - 85 = 90). Follow the reduction, both parking and circulation spaces previously allotted to these 90 car parks can be released for some other purposes. Parking spaces and laybys are correlated with each other to the length of stay of visitors/staff and with a minor switching in the design on people circulation, these spaces so released should be sufficient to meet the request of the TD.

It thus appears weird to us for the Hospital to reject an improvement suggestion from TD without choosing to clarify some of their comfy provision in the car parks to ease the concerns of traffic issue. In other words, the Hospital put their own operational needs at a higher priority over traffic concerns that might affect the neighborhood or the whole district. It also leads us to wonder why it is so essential for the Hospital to set and maintain this provision.

Hospital Response To comments from ArchSD on Visual Impact

ArchSD highlighted roof of Block 1, being 208.168mPD, would be higher than the Building Height Restriction of 190mPD. In terms of Building Height, it would be about 39.5% increase.

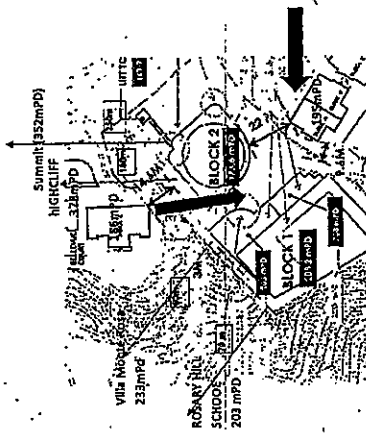
Roof Height 208.168mPD - G/F level at 144.018mPD = 64.15m;
Height Restriction 190mPD - G/F level at 144.018mPD = 45.982m
Height Exceeded by (64.15 - 45.982) ÷ 45.982 x 100% = 39.51 %

It was considered undesirable from visual impact point of view and might not be compatible with the adjacent low building development. Rosary Hill School and Villa Monte Rosa Blocks etc were cited as reference. ArchSD recommended the Hospital to explore further possibilities to minimize the height and its impact visually to the surroundings.

2

The Hospital narrated its innovative building design of two terraced gardens at North and North East, at level 199.118mPD and 203.418mPD respectively along with the main roof at 208.168mPD at the South and would be lower than Rosaryhill School and Monte Rosa block which are 203mPD and 233mPD and concluded that the block would not cause adverse visual impact and would be compatible with the surrounding area.

With the Hospital as a center we try to depict the building heights of adjacent blocks as follows:



Woodland Heights and Bellevue (arrows above) are immediate adjacent to the Hospital as shown.

We excerpt the photomontage of Knight Frank submission dated Dec 2019 for illustration. (Block 1 at the revised proposal now replaced Block A&B in the picture)



From the photomontage, left to the Hospital is Woodland Heights and right is Bellevue Court. If visual impact is to be considered, it is logical to approach the immediate adjacent developments at stone throw to the Hospital than to Monte Rosa or Rosary Hills which are 60 m or 70 m away, not to mention Summit or Highcliff.

When we put Woodland Heights into comparison, our block A is within 10m to the edge the Hospital block 1. Our roof level is 195mPD and the proposed hospital terrace is 203mPD. With a public roof garden next block slings just 10 m away and with a surrounding view at 8 m above, we can easily imagine the privacy issue and depression that will be brought upon our roof owners. As such we strongly object to the statement of no adversity on visually impact and compatibility with surrounding. We opine the approach is flawed.

Hospital Response To comments from ArchSD on policy support

The Hospital mentioned that it has sought support of the Food and Health Bureau ("FHB") in the expansion of in-patient beds and clinic service with respect to the application for minor height relaxation. It further referred Town Planning Board would be generally supportive to expansion of healthcare services for public interest and some public hospitals have been successful in obtaining height relaxation.

The above response on policy support was unsolicited, came out from nowhere. The detail of support from FHB was not disclosed neither. We however understand from Healthcare Reform Consultation Document and previous deliberation from the Secretary for Food and Health at Legco that it is the direction for private health care to complement the public healthcare by providing a choice for those who are able and willing to pay for private healthcare. To achieve this goal, a public private participation ("PPP") will be made in which the FHB will purchase primary care and hospital services, e.g. package charge or low charge beds or free beds from private sector or pursue PPP in hospital development in the form of co-location of facilities. Such details of arrangement must be documented in the land lease and should be transparent for public scrutiny.

We believe that for the sake of public interest in developing a safety net of healthcare, TPB would be receptive to consider a relaxation of building height upon a collaboration agreement between the FHB and the Hospital outlining the details as aforesaid. The agreement also needs to balance the interests of all stakeholders without infringing the rights of citizens. If there is such an agreement, such should be ready to be incorporated as condition for approval, and be present in this application for the knowledge of TPB and the public. And if the approval is not being challenged, the condition will be written in the lease modification accordingly for execution. However we fail to see this document in this application.

The reference to successful cases of height relaxation is irrelevant as expansion to public hospital is policy driven under the 1st and 2nd 10-Year Hospital Development Plan. If there is new policy not to our knowledge, such should also be presented and we are willing to hear from the Hospital further in this regard.

Conclusion

As illustrated from the responses, the Hospital is not thorough in forming its opinion and often the stance on one matter is irreconcilable with the other. Besides, some of our previous comments are not responded. We urge the Town Planning Board to safeguard the true intention of the Outline Zoning Plan in maintaining low rise character of the district, consider all relevant and disregard all irrelevant ones according to legislative and recognized administrative document. We hope our concerns as aforesaid are well considered and satisfied before you come to any decision and we lay our case in your competent hands and truly appreciate your due attention throughout.

Yours faithfully,

For and on behalf of

Incorporated Owners of Woodland Heights (Wong Nai Chung Gap Road)

Loren Wong
Acting Chairman

Wong Nai Chung Gap Road, Chairman

Douglas Van, Vice Chairman

Carl Lu, Secretary

Cc: Mr Ivan Wong, Councillor, Wan Chai District Council

致城市規劃委員會秘書：

專人送遞或郵遞：香港北角道華道 333 號北角政府合署 15 樓

傳真：2877 0245 或 2522 8426

電郵：tpbpd@pland.gov.hk

To : Secretary, Town Planning Board

By hand or post : 15/F, North Point Government Offices, 333 Java Road, North Point, Hong Kong

By Fax : 2877 0245 or 2522 8426

By e-mail : tpbpd@pland.gov.hk

有關的規劃申請編號 The application no. to which the comment relates

A/H14/82 Received on 28/01/2021

意見詳情 (如有需要，請另頁說明)

Details of the Comment (use separate sheet if necessary)

See Objection Statement dated 9th July 2021 (attached) as well as subsequent objection comments submitted thereafter. Summary as follows:-

- 1) Essential Development : Height, Plot Ratio, site coverage, proximity to neighbouring sites who are limited to existing built up development potential. Existing Mass is incompatible to neighbouring sites.
- 2) Traffic Issue : Existing Car Park provisions overload dumbbell roads. Planning intention is to provide additional parking spaces.
- 3) Relax height of AH will invite structural Review challenge by neighbours in Q2P.
- 4) No respect to existing site.
- 5) Prolonged construction and noise pollution over 15 years of development scheme is not acceptable.
- 6) Planning intention of mid height / mid density mid rise character not acceptable.

提意見人，姓名/名稱 Name of person/company making this comment Respected.

簽署 Signature (see below) 日期 Date 13 April 2021

Persons making the above comment is:- The Incorporated Owners of

Belvedere Court Block A

Belvedere Court Block B

Belvedere Court Block C

For and on behalf of
THE INCORPORATED OWNERS
OF BELVEDERE COURT BLOCK A

香港屋宇委員會
THE INCORPORATED OWNERS
OF BELVEDERE COURT, ALK. B

W. L. Y. Y.

Authorized Signatory

Authorized Signatory

Belvedere Court Block C

To: the Planning Department, North Point Government Offices, 333 Java Rd., Hong Kong

Objection of Adventist Hospital's application for Minor Relaxation of Building Height Relaxation for Permitted Hospital Use, 40 Stubbs Road, Hong Kong (Planning Application A/H14/82) - with submission of further information by applicant, May 2020.

Details of Comments / Objection submitted By The Incorporated Owners of Bellevue Court Block A, B & C, (Supplementary Sheet)

We refer to the above Planning Application (A/H14/82) and subsequent submission of further information by the applicant in June 2020. We also refer to our previous objection letters dated 8th February 2020 and 23 May 2020.

Regarding your respective letters to our Incorporated Owners of Bellevue Court Block A, B and C dated the 19th June 2020, we would like to reiterate our concerns and objection to Adventist Hospital's (AH) application for Building Height Relaxation and its resulting over-development of the hospital.

AH over-sized development and traffic generated would create an adverse and detrimental impact on the original planning intention and the mid-density and mid-rise character of the neighbourhood. Traffic over-loading on Stubbs Road, Blue Pool Road and Tai Hang Road, as well as negative environmental impacts including potential noise and dust nuisance caused by the unreasonably long redevelopment time-line proposed by AH.

Our detailed grounds of our objection are as follows:

1. Adventist Hospital's proposed Plot Ratio, Height Restrictions, Site Coverage & Car Park

1.0 Key data of AH's proposed redevelopment scheme are as follows:

- 1.0.1 AH's newly revised proposal of June 2020 submitted to the Town Planning comprises of 2 blocks (Block 1 and 2) instead of 3 blocks in the previous February scheme. A & B blocks as proposed in the Jan 2020 submission have been combined into Block 1 in the latest (May 2020) plan, and previous Block C is now Block 2
- 1.0.2 AH has applied for Planning Permission to relax the existing OZP compliance height restriction (190.518m above PD) by 22.4m, when measured to the proposed Block 1 plant room at 212.918m PD; and, 17.65m measured from the Block 1 roof level at 208.168m PD.
- 1.0.3 In AH's May 2020 scheme, proposed height of Block 2 is 176m PD to Green roof level and and 171.3 PD to main roof level. The OZP compliance height for this block is 165m PD and therefore the height relaxation applied is 11m for their upper roof level and 6.3m for their main roof level

1.0.4 Proposed Plot ratio of 5.59 (same as Jan 2020 proposal)

1.0.5 Site Coverage of 56.03% (same as Jan 2020 proposal)

1.0.6 A total number of car parking spaces for 184 cars park + 7 lay-bys for loading/unloading of taxis, ambulances, light buses etc. (same as Jan 2020 proposal)

1.0.7 Different from the Jan 2020 scheme, demarcation 1 in the drawing of the new June 2020 Landscape Proposal (Figure 1), shows that the existing retaining wall to the south (left hand side) of the entrance from Stubbs Road is to be retained and maintained. The drawing also shows that only a small number of existing trees outside AH retaining wall boundary on Stubbs road will be preserved.

1.0.8 This demarked tree preservation area does not seem to cover the existing mature trees located inside the retaining wall to the south of the car entrance within the AH boundary, nor the existing mature trees that are currently located on the north (right side) of the entrance. (see photo plate A below)

1.0.9 The location of proposed new Lift tower and Terraced Garden (demarcation 1 & 3 on our Figure 1-1) behind the existing retaining wall on south side of the car entrance as well as the Courtyard Garden (demarcation 2 on Figure 1.1) on the north side of the car entrance would necessitate the felling of most of the existing mature trees in the two areas.

1.1 Bellevue Court's 2003 Objection to the Outline Zoning Plan (OZP) No. S/H14/6

Historical background & previous Planning Decisions made by the TPB

- 1.1.1 In 2003, Town Planning Department's Peak Area OZP imposed an "Existing Bulk" restriction of plot ratio (i.e. future redevelopment to be no more than what is existing in a development) and upper limit of building heights to "existing building heights" to all 7 numbers of R(8)1 sites along Wong Nai Chung Gap Road and Upper Stubbs Road in the neighbourhood. Bellevue Court was one of the sites affected.
- 1.1.2 Individual owners and the Incorporated Owners Bellevue Court, alongside with other site owners in the neighbourhood submitted objections of the draft OZP to the Town Planning Board.
- 1.1.3 Bellevue Court's reasons for their objection were that majority of the restricted sites in the area were over 40 to 50 years old and were due for redevelopment. The newly imposed Height and Plot Ratio restrictions would practically dampen any future potential developer's interest and incentive in redeveloping the sites affected by the OZP.

1.1.4 Furthermore, owners of Bellevue Court argued that it was inequitable for the government to have allowed 2 towers at 41C and 41D Stubbs Road to build to high plot ratios (to 5 and 8 respectively) and to excessively tall heights of 67 & 69 storeys (likewise, Nicholson Tower, was also permitted in the past to build up 30 storeys and to a plot ratio of 5.1.), and then afterwards harshly restricted Plot Ratio of the remaining 7 sites to existing bulk and heights.

1.2 Rejection of Bellevue Court's owners objection by the Town Planning Board (TPB)

1.2.1 After a meeting held on the 14th March 2003, The Town Planning Board rejected Bellevue Court's and various neighbourhood owners' objections, stating the following grounds in their reply letters (See Attachment A –letter from Town Planning Board to the Incorporated Owners of Bellevue Court Block A – Ref. TPB/O/S/H14/6-3-1)

1.2.2 The two "super-tall" towers at 41C and 41D Stubbs Road were incompatible with the pre-dominant medium density and medium-rise development character of the area.

1.2.3 TPB explained that the restrictions of Plot Ratio and Heights (to existing bulk) on the R(B)1 zone sites (including Bellevue Court) were to "maintain this existing pre-dominant character of the area", and to "preserve public views" and to "protect the ridge-line" (behind the buildings)

1.2.4 The plot ratio restriction is "to avoid overtaxing the local road system". Increase development intensity in the uphill area "would adversely affect the traffic in the downhill area."

1.2.5 Development restrictions stipulated in the OZP is "to reflect the planning intention of the area."

1.2.6 Proposed Rezoning (by Bellevue Court and other objectors proposed an alternative higher plot ratio and height limit) would create an undesirable precedent. The cumulative effect of approving similar rezoning would result in adverse traffic impact and would change the medium rise, medium density character of the area.

1.2.7 In summary, the Planning Intentions behind the Outline Zoning Planning as endorsed by the Town Planning Board's meeting and subsequent hearing, can be clearly summarised as follows:

1.2.7.1 The super-tall developments of the Summit & Highcliff (41C and 41D Stubbs Road respectively) and by implication should include also the 30 storey towers of Nicholson Tower) are considered incompatible with development character of the area.

1.2.7.2 Development restrictions (of Plot Ratios and Heights) stipulated in the OZP is to reflect the planning intention of the area, which is to maintain the pre-dominant medium density and medium-rise character of the area, to preserve public view and to protect the ridge-line (of the Hill behind)

1.2.7.3 The OZP plot ratio restrictions is also to avoid overtaxing the local road system. Increase in development intensity would adversely affect the traffic downhill from the subject area.

1.3 Development details of the existing sites in the neighbourhood

Sites	Ex. Plot Ratio	Ex. Height (storeys)
41 Stubbs Rd (Bellevue Court)	3.8	13s & 14s
41D Stubbs Rd* (Highcliff)	8.0*	69s
41C Stubbs Rd* (The Summit)	5.0*	67s
41A Stubbs Rd (Villa Monte Rosa)	3.0	21s & 22s
43 Stubbs Rd (Evergreen Villa)	3.0	18s, 20s, 21s
43A Stubbs Rd (Victoria Heights)	3.0	24s
2 Wong Nai Chung Gap Rd (Woodland Heights)	2.6	16s
4A-D Wong Nai Chung Gap Rd (Valley View)	1.7	9s
6-10 Wong Nai Chung Gap Rd** (Nicholson Tower)	5.1**	30s
12-14 Wong Nai Chung Gap Rd (Leon Court)	3.1	12s

* Town Planning Board considered Plot Ratio excessive and incompatible with neighbourhood's low density, mid-rise character

** This should also be considered incompatible with neighbourhood character as it is 30 storeys tall

2.0 Detail grounds behind Bellevue Court's Objections

2.1 Objection to AP's application for Relaxation of Height Restrictions

AP's current Planning application is to ask the TPB for permission to relax the OZP height restriction from 190.518 m PD to 212.918 PD (22.4m higher) on their redevelopment plan, adding some 5 storeys of hospital floors above the existing height limit. This is equivalent to 6 to 7 storeys of a domestic buildings.

Bellevue Court, immediate neighbour AH's site on the north, is subject to OZP height restriction to its existing height of 189.42 m PD (measured to highest roof level). AH application to relax and increase their height restriction, if approved, shall be 23.45m above the maximum height of Bellevue Court, meaning that AH height would be about 7 domestic storeys higher than Bellevue Court.

Woodland Height, neighbour to AH's south boundary, is also subject to OZP height restriction. According to AH's planning application document, it has an existing max. height restriction of 195m PD. Consequently, AH's proposed new height of 212.918 m PD will be 17.918m higher than Woodland Height, which is equivalent to about 5.56 domestic storeys higher than Woodland Heights. In other words, AH's application to relax the OZP height restriction compliance would result in its redevelopment protruding dominantly above its neighbouring development

The plot ratio of 5.59 and a site coverage of 56.03% have contributed to the excessive bulk and height of Block 1 of the proposed hospital. In view of the OZP's original planning intention of maintaining mid-rise, medium density character of the neighbourhood, as well as the potential severe traffic concern mentioned in section 1.2.7.1 to 1.2.7.3 above, the application to relax AH's height restriction is too excessive and should not be approved.

2.2 Excessive Plot Ratio

It should be noted that the lifting of AH's height restriction not only would result in their new development protruding above its two neighbour buildings, it would indirectly result in enabling AH's scheme to achieve a plot ratio of 5.59 for their development.

Referring to Table 1.3 above, apart from the 2 tall towers of Highcliff (plot ratios of 8 with 69 storeys) and The Summit (plot ratio 5 with 67 storeys), as well as Nicholson Tower (plot ratio 5.1 of 30 storeys), the majority of the plot ratio restrictions of the remaining residential buildings sites along the neighbouring stretch of Stubbs Road and Wong Nai Chung Gap Road ranges from 1.7 to 3.8, with an average of 2.89.

This high plot ratio, together with the extra height and site coverage discussed below, will collectively contributed to the visual bulk of the hospital building if approved. (see application document: figure V3.3/- viewpoint C). AH's proposed plot ratio of 5.59 is double the average in the area and therefore too excessive for the area. Considering that the original planning intention of the OZP is to maintain the Mid-rise and Mid-density character of the neighbourhood, AH's scheme is clearly contradicting the OZP planning intention. The scheme should not be approved unless we see a reduction of its plot ratio, height and site coverage compatible with other sites in the area.

2.3 Excessive Site Coverage

In the AH planning application document, there is no data provided for comparison of site coverage of various buildings in the neighbourhood. Bellevue Court is an example of typical development built in the area in the 1950s. We therefore use Bellevue Court's site coverage to compare with the site coverage of the AH proposal. The site coverage in the AH scheme is 56.03%, while the Bellevue Court existing site coverage is 27.5%, about half of AH's proposal.

This high site coverage is one of the contributory reasons for why AH's redevelopment is looking so visually dense and bulky, and why its upper Block 1 had to be built up to its edge boundaries, as well as the car park building fronting Stubbs being so tall and bulky in size. (see figure 1.1 and V3.6- viewpoint C).

We therefore conclude that AH's coverage is way too excessive in relation to the site coverage of the neighbouring development and therefore must be reduced.

2.4 Excessive Car Park Provisions

The proposed provision of 184 carparks and 7 loading bays in the proposal is also excessive. The additional car parks and loading bays would result in increase in traffic loading in the neighbourhood road system. Lower Stubbs Road, Blue Pool Road and Tai Hang Roads are already very congested at peak used and rush hour time. The excessive provision of 184 car parks and 7 loading bays for service vehicles not only contributes to bulk and density of the development, it also contradicts the Town Planning Board's traffic concerns and the OZP planning intention for the area. (see sections 1.2.4 and 1.2.7.3 above)

Excessive traffic impact was one of the major reasons for the rejection of the previous neighbouring sites' applications to relax the plot ratio and height restriction stipulated by the OZP in 2003. We therefore conclude that the number of carparking and loading bay is far too excessive and the TP8 should not approved such number.

2.5 Undesirable visual impact of the redevelopment on the neighbourhood environment character

Despite the proposed new scheme of May 2020, the street fronting lift tower, the wide elevation of Block 2, as well as the fully stretched elevation of Block 1 across the entire width of the site, visually present a harsh looking bulk of building fronting Stubbs Road and the neighbourhood. This is especially obvious when we compare the new scheme with the existing round shape of the existing building. For the benefit of the environment and preserving the character of the neighbourhood, AH should also consider conserving and interior and refurbished the existing building instead of demolition and rebuild. (see figure 1 and V3.6/- photomontage viewpoint C)

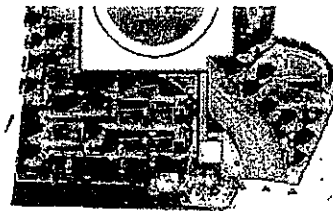
Furthermore, the proposed free standing Lift Tower located at the edge of Stubbs Road in front of Block 2 is a visually dominant and not in character with the visual context of the neighbourhood.

2.6 Preservation of the mature trees on site should be fully considered in drawing Different from the Jan 2020 scheme, demarcation 1. in the drawing of the new June 2020 Landscape Proposal (Figure 1), shows that the existing retaining wall to the south (left hand side) of the entrance from Stubbs Road is to be retained and maintained. The drawing also shows that only a small number of existing trees outside AH retaining wall boundary on Stubbs road will be preserved

This demarked tree preservation area does not seem to cover the existing mature trees located inside the retaining wall to the south of the car entrance within the AH boundary, nor the existing mature trees that are currently located on the north (right side) of the entrance. (see photo plate A below)

The location of proposed new Lift tower and Terraced Garden (demarcation 1 & 3 on on-figure 1-3) behind the existing retaining wall on south side of the car entrance as well as the Courtyard Garden (demarcation 2 on Figure 1.1) on the north side of the car entrance would necessitate the felling of most of the existing mature trees in the two areas.

We are of the opinion that felling of these trees would be highly unacceptable in the interest of environmental protection and tree preservation. As the scheme shows insufficient sensitivity and respect to the existing mature trees and the environment, we object to the entrance area design of AH redevelopment plan.



2.1.7 The unreasonably long construction programme

The 3 phase long project programme stretching over 15 years in 3 phases for a private redevelopment of its scale is unacceptable to its neighbours.

The prolonged redevelopment programme would post an unnecessary long period of disturbances to the area in terms of nuisance cause by construction noise, dirt and dust pollutions, potential crime and security issues, as well as traffic delays caused by truck deliveries and utility connection works etc.

We are not sure of the reason behind this abnormally long redevelopment programme (15 years in 3 phases) and there is no clear and detailed account of how the development will be physically phased, nor to what extent existing hospital services would be disrupted or suspended during the construction period.

We are not certain why AH needs such an abnormally long redevelopment time and phasing programme. Whether it is due to reasons such as the complexity of keeping existing hospital services in operation, or technical complexity in implementing the construction work, or due to financial constraints and cash-flow needed to finance the huge cost of site formation and building on their back-slope, it all points to the possibility that AH's complex redevelopment is oversized and over-ambitious

In any case, the proposal is insensitive to the site's inherent character and constraints and it contravenes the planning intention of the Outline Zoning Plan of the area.

2.2. Is Adventist Hospital redevelopment plan fully benefit the community at large?

The AH stated that the redevelopment would increase 70% more beds provision to meet the needs of the community.

However, there is no objectively proven evidence that such demand is so large that it renders for the Town Planning Board to approve the relaxation of OZP height restriction which would result in endorsing such a high density of development in the area.

The reasons for our questioning of the over-size, over-ambitious nature of the AH redevelopment proposal is as follows:

2.2.1 Adventist Hospital is high quality but very expensive private hospital, affordable by and benefiting only high-net worth individuals and executives of large companies in the community, and not the general public at large.

2.2.2 The proximity of site location on Hong Kong Island is not short of private hospitals. Examples are:

- A Gleneagles Hospital at lower Nam Fung Road (500 beds)
- B St. Paul's Hospital, with its recently built extension at the bottom of Tai Hang Road (400 beds)
- C HK Sanatorium & Hospital in Happy Valley (480 beds)

In addition, there are also the old private Matilda Hospital at the Peak and Caritas Canossa Hospital in Old Peak Road Central.

2.2.3 In view of the above and the undesirability of AH's over-size proposal, we strongly recommend that AH's project should be cut back to a more reasonable size with plot ratio, site coverage and heights (not to exceed the QZP height) that can commensurate and enhance the character and suburban quality of the neighbourhood.

3.0 Conclusion

The Town Planning Department and Town Planning Board is requested to refrain from approving Adventist Hospital's height limit relaxation application for reasons below:

- 3.1 The development is excessive in Height, Plot Ratio and Site Coverage, resulting in an excessive building bulk, for reasons outlined in detail in Section 2.1 above.
- 3.2 The traffic generated by the additional car parking in the new development directly contradicts the very reason why height and plot ratio had to be restricted under the 2003 QZP. The carpark numbers are unacceptably too high.
- 3.3 AH's application report has not given due consideration to the development's visual impact and its respect of the character of the neighbourhood, and has no full proposal on how to conserve ALL the existing mature trees in the area.
- 3.4 The application has not demonstrated how it would mitigate the potential prolonged nuisance caused by the redevelopment process nor has it outlined how AH's medical operation and services are affected and organised during the phased construction work.
- 3.5 Adventist Hospital is supposed to be a NGO providing medical service to the community and should not be seen profiting from it. There are plenty of expensive private hospital capacities on Hong Kong Island. Given the context of the site, there is no sound reason for AH to redevelop to such an excessive manner.
- 3.6 Referring to the Town Planning Board's previous disapproval letter to Bellevue Court's application dated 28 March 2003 (reference TPE/O/S/H14/6-3), approving AH's application to relax height limit is inequitable to all owners in the nearby

neighbourhood, whose previous developmental potential had to be reduced, height restricted and sacrificed for the common purpose of conserving the 'mid density' and 'mid-rise' character of the neighbourhood, as well as to avoid over-taxing of traffic on the local road network.

If the Town Planning Board is to approve AH's current application to relax their QZP height restriction, it would create an undesirable precedent that destroy the integrity of the original planning intention, and potentially open up to challenge through Judicial Review in the future by owners in the neighbourhood.

For and on behalf of:

THE INCORPORATED OWNERS
OF BELLEVUE COURT BLOCK B

Authorized Signature

The Incorporated Owners
of Bellevue Court Block B

The Incorporated Owners
of Bellevue Court Block A

Date: 8 February 2020

The Incorporated Owners
of Bellevue Court Block C

Advisory Clauses

- (a) to note the comments of the Director of Health that the Private Healthcare Facilities Ordinance (Cap. 633) was gazetted on 30.11.2018. Private hospitals, day procedure centres and clinics are subject to regulation under Cap. 633. The new regulatory regime should be observed and the relevant conditions and requirements should be complied with;
- (b) to apply to Lands Department (LandsD) for a lease modification and the necessary approval(s) to implement the proposal. Such application will be considered by LandsD in the capacity of a landlord at its discretion and there is no guarantee that such applications will be approved. If such application is approved by LandsD, it will be subject to such terms and conditions, including, among others, payment of premium and administrative fees, as considered appropriate by LandsD;
- (c) to note the comments of the Chief Town Planner/Urban Design and Landscape, Planning Department that the applicant should seek agreement from relevant departments on the proposed slope enhancement works so as to avoid any misleading information in the application;
- (d) to note the comments of the Director of Environmental Protection that since the proposal involves building demolition and excavation, the applicant is advised to minimise the generation of construction and demolition (C&D) materials, and reuse and recycle the C&D materials on-site as far as possible, and observe and comply with the legislative requirements and prevailing guidelines on proper waste management for the proposed redevelopment; and
- (e) to note the comments of the Chief Highway Engineer/Hong Kong, Highways Department (CHE/HK, HyD) that the following is suggested to be included during the implementation of the modification works:
 - (i) before implementation of the slope modification works, the project proponent should prove the magnitude of vibration and ground movement, the change of ground water level, and/or other activities so induced by his works will not affect the structural/geotechnical integrity of this HyD feature at time of construction works in progress and/or in the long run. It is also required to establish an approved warning system to stop the construction works if the above mentioned movements exceed permissible limits or activities are considered causing damage of the retaining wall. It is also required to establish and implement a monitoring system, given prior acceptance of the proposal by Head of the Geotechnical Engineering Office/Civil Engineering and Development Department (H(GEO), CEDD), which include the installation of monitoring stations on the retaining wall(s) and subsequent base line survey;

- (ii) during the implementation of the modification works, conduct regular, or if so required, monitoring survey during the process of construction works, and with assessment report afterwards. The construction activities should be suspended if the monitoring results are found exceeding the permissible limits. Prompt investigation should be carried out to find out the reasons of the case and to modify the method of construction to prevent possible damage to these slopes/retaining walls; and
- (iii) for remedial proposals for damaged slopes/retaining walls, if the structural/geotechnical integrity of the HyD feature is affected, the project proponent should carry out remedial works at his own cost and with the rectification proposal approved by H(GEO), CEDD .