

APPLICATION FOR PERMISSION
UNDER SECTION 16 OF THE TOWN PLANNING ORDINANCE

APPLICATION NO. A/H14/82

<u>Applicant</u>	:	General Conference Corporation of Seventh-Day Adventists represented by Knight Frank Petty Limited
<u>Application Site</u>	:	40 Stubbs Road, Hong Kong
<u>Site Area</u>	:	about 7,933.8m ²
<u>Land Status</u>	:	Inland Lot 8170 (about 7,933.8m ²) (a) shall be used for a sanatorium and hospital together with staff quarters therefor as the Director of Medical and Health Services may consider reasonable for housing staff and workmen employed on the premises (b) subject to term of 75 years commencing from 23.3.1967
<u>Plan</u>	:	Approved The Peak Area Outline Zoning Plan (OZP) No. S/H14/13
<u>Zoning</u>	:	“Government, Institution or Community” (“G/IC”) (a) maximum building height (BH) of 165mPD (northern portion) and 190mPD (southern portion) of the application site (the Site), or the height of the existing building, whichever is the greater (Plan A-1) (b) provision for application for minor relaxation of the above restrictions
<u>Application</u>	:	Proposed Minor Relaxation of building height restriction (BHR) for Permitted ‘Hospital’ use

1. The Proposal

- 1.1 The applicant seeks planning permission for minor relaxation of BHR from 190mPD to 208.168mPD (about +10% in terms of mPD or +40% in terms of absolute BH (i.e. 18.168m)) in the southern portion of the Site to facilitate the redevelopment of the Hong Kong Adventist Hospital (HKAH), which is zoned “G/IC” on the approved The Peak Area Outline Zoning Plan (OZP) No. S/H14/13 (**Plan A-1**). According to the Notes of the OZP for “G/IC” zone, ‘Hospital’ use is always permitted.
- 1.2 The Site is subject to the BHRs of 190mPD (southern portion) and 165mPD

(northern portion), or the height of the existing building, whichever is greater (**Plans A-1 and A-2**). The BH of the proposed Block 1 at the southern portion of the Site is 208.168mPD, which would exceed the BHR of 190mPD as stipulated on the OZP, while that of the proposed Block 2 is 171.3mPD, which would be lower than the BH of the existing building¹ (i.e. 172mPD). Hence, planning permission from the Town Planning Board (the Board) for minor relaxation of BHR is only required for Block 1. In addition, the applicant has confirmed that all the enclosed and covered structures on the upper roof of Blocks 1 and 2 would not exceed 50% of the roof area of the floor below and in compliance with the Joint Practice Note (JPN) No. 5². As such, the upper roof of Blocks 1 and 2 for plant room did not count towards the height of the building.

- 1.3 The southern portion of the Site would be redeveloped to Block 1 for major hospital services, while the northern portion would be redeveloped to Block 2 mainly for car parking and a proposed lift tower with a BH of 151.5mPD connecting between Stubbs Road and Block 2 to enhance the accessibility of the Site (**Drawings A-1 and A-2**). A covered footbridge is also proposed to connect between the lift tower and Block 2.
- 1.4 The floor-to-floor heights (FTFH) of the proposed redevelopment range from 4.3m to 4.8m, which are higher than the range from 2.5m to 3.1m of the existing HKAH. According to the applicant, the proposed redevelopment of HKAH intends to provide additional bed spaces and other hospital facilities, as well as echo with the 2018 Policy Address regarding the enhancement of healthcare services in Hong Kong. When compared with the existing hospital, the proposed redevelopment would provide additional medical facilities including 96 beds (+71.11%), three operating theatre (OT) rooms (+75%) and 29 consultations rooms (+80.56%).
- 1.5 The built form of the proposed redevelopment has adopted stepped BH design to respect the natural topographical profile in which the BH will descend from the southern portion to the northern portion of the Site, as well as creating diversity and variety in BH profile for visual interest. Building separations are proposed to enhance visual and air permeability, including 7m to 15m between Block 1 and Block 2, 15m between Block 1 and Woodland Heights and 20m between Block 2 and Bellevue Court (**Drawing A-3**). Various landscape features are also proposed (**Drawings A-7 and A-8**) including landscaped gardens fronting Stubbs Road (i.e. courtyard garden and terraced garden) at northern and north-eastern of the Site for patients, staff and visitors, terrace gardens at 12/F and 13/F of Block 1 to reduce the building mass, as well as green roof and edge planting on Block 2 to enhance visual amenity. The green coverage will be not less than 20% of the site area, which fully complies with the Sustainable Building Design Guidelines (SBDG). The vehicular access to the Site will remain at the same location abutting Stubbs Road. A pick-up/drop-off bay will

¹ The existing HKAH comprises two buildings, i.e. La Rue Building with a BH of 188mPD for staff quarters (southern portion) and Main Building with a BH of 172mPD for specialist outpatient and inpatient services (northern portion) (**Plans A-3 and A-4**).

² Joint Practice Note No. 5 promulgates the streamlined arrangements in imposing and ensuring compliance of BHR as a development control parameter amongst the Buildings Department, Planning Department and Lands Department.

also be provided at G/F outside the entrance of Blocks 1 and 2.

- 1.6 The block plan, section plan, building layout plan, phasing plans, landscape proposal and photomontages submitted by the applicant are at **Drawings A-1 to A-14**. The main development parameters of the proposed scheme are set out below:

	<u>Proposed Scheme</u>	<u>Existing HKAH</u> (for information only, provided by the applicant)
BHR under OZP	Southern portion: 190mPD Northern portion: 165mPD	
Site Area	about 7,933.8m ²	
Gross Floor Area	Total: 44,337.83m ² <u>Southern portion</u> - Block 1: 38,316.06m ² <u>Northern portion</u> - Block 2: 5,913.77m ² - Lift Tower: 108m ²	Total: 16,130.88m ² <u>Southern portion</u> - La Rue Building: 9,838.66m ² <u>Northern portion</u> - Main Building: 6,292.22m ²
Plot Ratio (PR)	5.59	2.03
Maximum BH/ No. of Storeys	<u>Southern portion</u> - Block 1: 208.168mPD (16 storeys including 1 basement) (absolute BH of 64.15m measured from 144.02mPD) (+10% in terms of mPD or +40% in terms of absolute BH) <u>Northern portion</u> - Block 2: 171.3mPD (10 storeys including 3 basements) - Lift Tower: 151.5mPD	<u>Southern portion</u> - La Rue Building: 188mPD (15 storeys) (absolute BH of 43.98m measure from 144.02mPD) <u>Northern portion</u> - Main Building: 172mPD (10 storeys)
FTFH	4.3m – 4.8m	2.5m – 3.1m
Site Coverage (SC)	56.03% (+125%)	24.90%
No. of Bed Spaces	231 (+71%)	135
No. of Consultation Rooms	65 (+81%)	36
No. OT Rooms	7 (+75%)	4
Carparking Spaces	Total: 184 - Private Car: 175 - Disabled: 6 - Ambulance: 3	Total: 82

	<u>Proposed Scheme</u>	<u>Existing HKAH</u> (for information only, provided by the applicant)
Loading/ Unloading (L/UL) Spaces	Total: 15 - Taxi/Private Car: 7 - Medium/Heavy Goods Vehicle: 5 - Ambulance: 2 - Public Light Buses: 1	1 for Medium/Heavy Goods Vehicle

1.7 The floor uses³ of the proposed development are set out below:

<u>Block 1</u>	
LG1/F	Hospital / plant room
G/F	Lobby, plant room, hospital, loading/unloading bay, EVA, car ramp
1/F	Hospital, pharmacy, plant room, car ramp
2/F	Hospital and ancillary facilities
3/F to 5/F	Hospital, car park, and ancillary facilities
6/F to 11/F	Hospital and ancillary facilities
12/F	Hospital, ancillary facilities and terrace garden
13/F	Hospital, plant room, ancillary facilities and terrace garden
R/F	Plant room
<u>Block 2</u>	
LG3/F to G/F	EVA and car ramp
1/F to 4/F	Car park
5/F	Car park and Hospital
R/F	Plant room

1.8 The redevelopment of HKAH will be in three phases (**Drawings A-4 to A-6**) with a view to maintaining existing hospital operation and not to compromise the provision of healthcare services, as well as allow sufficient time and space for decanting. The proposed redevelopment is anticipated to be completed in 2035 and each phase will take about three to four years to complete. Summary of each phasing are set out below:

<u>Phasing</u>	<u>Proposed works</u>
I	<ul style="list-style-type: none"> Excavation works for Block 1 Construction of part of Block 1 (i.e. Block 1A) Relocation part of the services of existing Main Building and La Rue Building to newly constructed Block 1A
II	<ul style="list-style-type: none"> Excavation works for Block 1 Demolition of existing La Rue Building and construction of remaining part of Block 1 (i.e. Block 1B) Relocation of the remaining services in the existing Main Building to newly constructed Block 1B

³ The types of medical facilities to be proposed in each floor are to be determined in later detailed design stage.

Phasing	Proposed works
III	<ul style="list-style-type: none"> Excavation work to connect with the level of Stubbs Road; Demolition of existing Main Building; and Construction of Block 2 and lift tower and related covered footbridge

1.9 In support of the application, the applicant has submitted the following documents:

- (a) Application form received on 10.1.2020 **(Appendix Ia)**
- (b) Further Information (FI) received on 12.3.2021 and 15.3.2021 providing a consolidated report which supersedes all previous FI submissions⁴ and the original Supplementary Planning Statement, as well as a revised Traffic Impact Assessment (TIA)
(accepted but not exempted from publication and recounting requirements) **(Appendix Ib)**
- (c) FI received on 7.5.2021 providing responses to departmental comments, phasing plan and access arrangement
(accepted and exempted from publication and recounting requirements) **(Appendix Ic)**

1.10 The Metro Planning Committee (the Committee) agreed to defer making a decision on the application twice on 6.3.2020 and 4.9.2020, as requested by the applicant, to allow time for preparation of FI in response to departmental comments. As the applicant has submitted FIs on 12.3.2021 and 15.3.2021, the application is scheduled for consideration by the Committee at this meeting.

2. Justifications from the Applicant

The justifications put forth by the applicant in support of the application are details in Section 5 of the Planning Statement at **Appendix Ib** which are summarised as follows:

In-line with planning intention and meeting public concerns for healthcare services and meeting operational need

- (a) The proposed redevelopment, which is intended to upgrade the existing medical facilities to serve the increasing demand on medical services in the community, is in line with the planning intention of the “G/IC” zone.
- (b) In view of the current pandemic, HKHA would prioritise infection control and emergency preparedness in the redevelopment project, with a significant upgrade

⁴ A total of 7 numbers of previous FIs with revised technical assessments (dated 6.5.2020, 12.6.2020, 16.7.2020, 2.11.2020, 24.11.2020, 21.12.2020 and 28.1.2021) have been received for the application to respond to departmental and public comments. All 7 FIs are accepted but not exempted from publication.

in infection control facilities engineering to reduce the risk of hospital cross infections. The proposed redevelopment with multiple entrances could also avoid crowd and reduce the registration and admission time.

- (c) The proposed redevelopment is in line with the 2018 Policy Address in respect of enhancing the healthcare services to alleviate the pressure on public hospital. The proposed minor relaxation of BHR for the southern portion is essential in carrying out the upgrading works of the existing medical facilities and maintaining the high quality medical services for the increasing demand. The applicant has reserved two-fifth of bed spaces (i.e. 92 beds) for standard wards upon redevelopment to alleviate public hospitals' pressure.
- (d) The primary aim of the redevelopment of HKAH is to upgrade the existing heavily-utilised medical facilities to maintain the provision of high-quality medical services for the patients. With the prevalent use of advance medical information systems, imaging, fibre-optics and robotic surgical technology, the proposed higher FTFH (increase from 2.5m - 3.1m of existing HKAH to 4.3m - 4.8m of proposed redevelopment) is considered minimal to accommodate modern medical facilities and associated electrical/mechanical services and cater for operation needs necessarily contributes to the BH of Block 1.

Compatible with the surroundings

- (e) High-rise residential developments, namely the Summit and the Highcliff, with a BH of about 352mPD and 378mPD respectively are located to the north-west of the site. Hence, a relaxed BH of 208.168mPD is considered not incompatible with the surrounding area.

Fulfilling criteria for minor relaxation restriction in accordance with the OZP

Achieving better urban design and local area improvements

- (f) To further improve the urban design aspect of the proposed redevelopment, the building profile of Block 1 is modified to include innovative building design. The south-eastern part of Block 1 incorporates vertical elements, as well as two terrace gardens on 12/F and 13/F in a view to reducing the building mass. Edge plantings are proposed on Block 2 to help soften the building lines and harmonise with the existing urban setting (**Drawing A-8**). The Block 1 blends well with the stepped building design and this gradation of BHs would help wind deflection and avoid stagnation as well.
- (g) The Site is currently lack of open space as there is only sitting-out area to the south-west of the existing Main Building. Landscaped open spaces with a balanced mix of hard and soft landscape are proposed to provide a more pleasant and relaxing environment to be enjoyed by patients, visitors and staff.

Providing better streetscape and improving pedestrian walking environment

- (h) The Site is accessed via Stubbs Road. Visitors, who are currently arriving on foot, need to walk up the curved and sloped access road at the Site. With the

proposed lift tower abutting Stubbs Road and connecting to Block 2, the accessibility to the Site will be significantly enhanced, especially for those with limited mobility. The proposed gardens will form a green gateway to the proposed redevelopment which can improve pedestrian walking experience and pedestrian environment.

Providing building separations to enhance air and visual permeability

- (i) Whilst there is no planning restriction on the SC and PR of the subject “G/IC” zone, the permitted SC and PR in accordance with Building (Planning) Regulations (B(P)R) for the proposed redevelopment are 60% and 15 respectively. Compared with B(P)R compliant scheme, the proposed scheme can reduce the building bulk and enhance visual and air permeability by providing building separation from the adjacent developments. Building separation of 7m to 15m between Block 1 and Block 2 is accommodated in the proposed redevelopment. Efforts have also been made to allow greater building separation from the adjacent developments to minimise potential impact, including 15m between Block 1 and Woodland Heights and 20m between Block 2 and Bellevue Court (**Drawing A-3**). The proposed terrace gardens on 12/F and 13/F of Block 1 can enhance the stepped BH concept.

Improvements to townscape, enhancing landscape amenity and promoting green design

- (j) Large part of the southwest portion of the Site is currently a slope of soil and rock material. Greening treatments to the steep slope are proposed to restore the natural scene of the slope and visual harmony to the environment.
- (k) The height of the proposed redevelopment will retain the natural backdrop of Mount Nicholson. The proposed BH of Block 1 (208.168mPD) would not exceed the ridgeline of the mountain (430mPD). Together with the Summit and the Highcliff with BH of about 352mPD to about 378mPD respectively, as well as the existing medium-rise residential buildings in the surrounding, the proposed redevelopment will form a unique townscape representing the district with different built form and mass in the Site.
- (l) The proposed redevelopment is designed to integrate with the surrounding landscape and rural character. The existing hard-paved slope will be mostly replaced with landscaped gardens. The green coverage will be not less than 20% of site area, which is fully complied with the SBDG. Since a stepped BH profile is adopted, the green roof will create visual delight for surrounding high-rise buildings.

Site constraints

- (m) The Site is located on a steep slope with significant level difference from the entrance and development platform, i.e. 126mPD to 144mPD. A large portion of the Site is inevitably reserved for the provision of vehicular access to the hospital. By relocating the internal transport facilities inside the building structures, there will be more area to provide quality open space with landscape amenity (i.e. Courtyard Garden and Terraced Garden) as compared to the existing condition in

which open space is occupied by hard-paved ramp and outdoor car parks.

- (n) Further excavation of existing bedrock under Block 1 has been explored to pursue the redevelopment by adhering to the BHR. However, considering the Site is located on a steep slope, deepened excavation will extend the construction period and cause severe noise nuisance and traffic impact to Stubbs Road which will be extremely disturbing to the residents nearby.

No adverse technical impacts

- (o) The Tree Survey Report and Landscape Proposal (Appendix II of **Appendix Ib**) revealed that there are total of 59 trees with condition generally poor to fair with low to medium amenity value within the Site. In addition, a total of 13 trees located on shotcrete slope and the retaining wall which is proposed to be modified to match the terraced garden. These 13 numbers of trees are outside the lot boundary abuts to the main vehicular access from Stubbs Road. In sum, a total of 72 trees would be affected by the redevelopment. In consideration of their locations and landscape value, 43 of them (30 trees within the site and 13 trees outside the site) are proposed to be felled and replanted in a 1:1 ratio while the rest of them, which located on the natural slope along the southwest boundary, will be retained.
- (p) Based on the visual impact assessment (VIA), TIA, environmental assessment, geotechnical planning review report (GPRR), and sewerage impact assessment (SIA), there would be no insurmountable technical problems arising from the proposed redevelopment (Appendices III to VII of **Appendix Ib**). Good site practice and relevant mitigation measures will be implemented during the construction and operation phases.

Public consultation

- (q) The applicant has undertaken a public engagement exercise in June 2020 regarding the redevelopment of HKAH. 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 (Appendix IX of **Appendix Ib**). The applicant has also briefed Mr Wong Wang-tai, Wan Chai District Council Member, on the details of the redevelopment and addressed his and the residents' concerns.

3. Compliance with the “Owner’s Consent/Notification” Requirements

The applicant is the sole ‘current land owner’. Detailed information would be deposited at the meeting for Members’ inspection.

4. Previous Application

There is no previous application at the site.

5. **Similar Application**

There is a similar application (No. A/H14/62) for minor relaxation of BHR on “G/IC” zone within the OZP. The application was for a proposed minor relaxation of BHR (from 5 storeys to 6 storeys) for permitted Hospital use at Matilda & War Memorial Hospital at 41 Mount Kellett Road (**Plan A-1**). The application was approved with conditions by the Committee on 23.12.2010 mainly on the considerations that the proposed development was generally in line with the planning intention, not incompatible with the surroundings; would not have any adverse traffic, visual and landscape impacts arising from the proposed relaxation. Details of the application are at **Appendix II**.

6. **The Site and its Surrounding Areas** (Plans A-1 to A-3 and site photos on Plans A-5 to A-7)

6.1 The Site is:

- (a) abutting Stubbs Road and accessible via a right-of-way connecting Stubbs Road to its northeast;
- (b) situated on an elevated platform of about 144mPD with reinforced slope at its south-western portion; and
- (c) it is currently occupied by the HKAH which consists of two buildings, i.e. the 10-storey Main Building of about 172mPD (northern portion) and the 15-storey La Rue Building of about 188mPD (southern portion) in height.

6.2 The surrounding areas have the following characteristics:

- (a) to the immediate northwest are medium-rise residential developments, namely Bellevue Court and Villa Monte Rosa, with BH ranging from about 186mPD to 233mPD, under “Residential (Group B)1” (“R(B)1”) zone;
- (b) to the further northwest within the same “R(B)1” zone are high-rise residential developments, namely the Summit and the Highcliff with BH of about 352mPD and 378mPD respectively;
- (c) to the immediate east is a medium-rise residential development, namely Woodland Heights with a BH of about 195mPD;
- (d) the areas to the south, southwest and southeast are the mountain backdrop of Mount Nicholson under “Green Belt” (“GB”) zone and further southwest is Rosaryhill School with a BH of about 204.3mPD under “G/IC” zone; and
- (e) to the northeast across Stubbs Road and Tai Hang Road are the Eastern Water Treatment Works of about 123mPD under “G/IC” zone.

7. **Planning Intention**

- 7.1 The planning intention of “G/IC” zone is primarily for the provision of GIC 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, organisations providing social services to meet community needs, and other institutional establishments.
- 7.2 As stated in paragraph 8.4 of the Explanatory Statement (ES) of the OZP, specific BHR for the “G/IC” zone, which mainly reflect the existing BHs of developments, have been incorporated in the OZP. The intention is to ensure that the scale and intensity of the developments on the “G/IC” sites would be compatible with those of the surrounding developments to maintain the existing low-rise character of the area. To maintain the existing medium-rise character of the local setting and preserve the visual access to the natural mountain backdrop, the site is restricted to a maximum BH of 165mPD and 190mPD for its northern and southern portions respectively.
- 7.3 As stated in paragraph 7.4 of the ES of the OZP, a minor relaxation clause in respect of the BH restrictions is incorporated into the Notes of the OZP to provide incentive for developments/redevelopments with planning and design merits and to cater for circumstances with specific site constraints. Each application for minor relaxation of BHRs will be considered on its own merits and the relevant criteria for consideration of such relaxation are as follows:
- (a) integrating building design with the natural setting/local context for achieving better urban design and local area improvements;
 - (b) accommodating the bonus plot ratio granted under the Buildings Ordinance in relation to surrender/dedication of land/area for use as public passage/street widening;
 - (c) providing better streetscape/good quality street level public urban space;
 - (d) providing separation between buildings to enhance air and visual permeability;
 - (e) accommodating building design to address specific site constraints in achieving the permissible plot ratio under the OZP; and
 - (f) other factors such as need for tree preservation, innovative building design and planning merits that would bring about improvements to the townscape and amenity of the locality and would not cause adverse landscape and visual impacts.

8. Comments from Relevant Government Departments

- 8.1 The following government departments have been consulted and their views on the application are summarised as follows:

Policy Support

8.1.1 Comments of the Secretary for Food and Health (SFH):

- (a) Facing the challenges of an aging population, public demand for healthcare services will increase in the future. The Government's policy is to facilitate the further development of private hospitals to serve the Hong Kong community, in order to promote the healthy development of a dual-track healthcare system in Hong Kong and alleviate the burden of the public healthcare system in the long run. The implementation of the Voluntary Health Insurance Scheme in April 2019 would further facilitate members of the public to use private healthcare services in the future. It is therefore the Food and Health Bureau (FHB)'s policy to encourage private hospitals to make effective use of their sites and provide more beds to meet the rising demand for healthcare services; and
- (b) SFH has invited the applicant to consider accepting a set of minimum requirements, including, inter alia, service scope, packaged charges, service standards and reporting on compliance. The applicant advised that it is willing to consider the requirements, the details of which would be further discussed at the lease modification stage. Against this background, SFH supports in-principle the application.

Land Administration

8.1.2 Comments of the District Lands Officer/Hong Kong East, Lands Department (DLO/HKE, LandsD):

- (a) the Site falls within IL 8170 which is held under the Conditions of Exchange No. 9235 as varied or modified by Modification Letters dated 24.11.1967 and 2.11.1968 and extended by an Extension Letter dated 23.3.1977. The lease term is 75 years commencing from 23.3.1967 which contains the following lease conditions:
 - (i) the lot shall be used for a sanatorium and hospital together with staff quarters therefor as the Director of Medical and Health Services may consider reasonable for housing staff and workmen employed on the premises; and
 - (ii) the proposed redevelopment and other references would be in contravention of the existing lease restrictions

governing the roofed-over area and the car parking and L/UL spaces requirements.

- (b) it is noted in paragraphs 4.4 – 4.11 of the Tree Survey Report (Appendix II of **Appendix Ib**) that the proposed redevelopment would affect some existing trees growing within and outside the concerned lot. The applicant has clarified that the existing trees, which are growing outside the concerned lot and owned by others, will be retained. The applicant should submit the tree preservation and removal application to the relevant authority for prior approval;
- (c) it is noted from paragraph 4.4 in the GPRR (Appendix VI of **Appendix Ib**) that the proposed redevelopment would affect some existing slope features. The applicant is required to seek the prior consent/approval from relevant parties before carrying out any works thereon. In particular, sub-section 2 of Slope Feature No. 11SW-D/R141 (**Plan A-4**) is maintained by the Highways Department (HyD). The applicant is required to seek prior consent of the HyD before carrying out any works thereon;
- (d) regarding the landscape works detailed in the Landscape Proposal (Appendix II of **Appendix Ib**):
 - (i) for the site coverage of greenery within the concerned lot, please refer to BD for consideration under the spirit of streamlining development control as stated in JPN No. 3; and
 - (ii) the applicant would apply for LandsD's approval before carrying out the slope works outside the lot boundary. Meanwhile, for the landscape works and proposed trees to be felled outside the lot boundary, the applicant should refer to the relevant government departments for comment in accordance with paragraph 7 of JPN No. 3 and paragraph 23 in Land Administration Office, Lands Department Practice Note Issue No. 2/2020 respectively.
- (e) should the application be approved, the applicant is required to apply to 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.

Traffic

8.1.3 Comments of Commissioner of Transport (C for T):

- (a) no objection to the subject planning application subject to the comments below on TIA submitted:
 - (i) for parking and loading/unloading facilities, it is noted that the proposed provision of internal transport facilities can meet the upper end of the requirements stipulated in the Hong Kong Planning Standards and Guidelines (HKPSG), except the number of L/UL bays for taxis/private cars which is assessed and justified to be adequate based on the observed traffic entering HKAH. Besides, the proposed drop gate, which will be located at a minimum distance of 78m away from Stubbs Road, would provide queuing space of about 13 vehicles. Having considered the existing site constraints, they have no objection in principle to the proposed internal transport facilities under this application. Nevertheless, the applicant is recommended to explore the feasibility of further increasing the provision of L/UL bays for taxis/private cars;
 - (ii) for traffic count survey, since the traffic count survey was carried out in January 2019 and the reference trip rates of two other private hospitals were obtained in October 2020 when the number of hospital visitors was limited due to the outbreak of COVID-19, the applicant should review the trip rates and the traffic impact associated with the subject redevelopment when the situation becomes normal upon the pandemic; and
 - (iii) for junction capacity performance, according to the applicant's assessment, the proposed redevelopment of HKAH would not induce unacceptable traffic impact upon commissioning. Despite the above, the applicant proposes to widen the existing access road to HKAH (within its lot) to facilitate manoeuvring of long vehicles and improve the performance of its junction with Stubbs Road, which is welcomed and appreciated. However, there is no detail of this proposal in this application. The applicant should carry out further study to assess the technical feasibility and devise the widening scheme of the access road. The applicant may also consider implementing traffic management measures within its lot as appropriate to minimise the traffic impact arising from the proposed redevelopment.

- (b) it is suggested to include the following in the approval conditions:
 - (i) the submission of a revised TIA or Traffic Review, and implementation of the road improvement works identified therein (if any), to the satisfaction of C for T; and
 - (ii) the design and provision of internal transport facilities for the proposed development to the satisfaction of C for T.

Visual and Urban Design

8.1.4 Comments of the Chief Town Planner/Urban Design and Landscape, Planning Department (CTP/UD&L, PlanD):

- (a) the site is located on an elevated platform of about 144mPD and adjacent to the site are medium-density residential developments built along Stubbs Road with BH ranging of about 186mPD and 195mPD. To the south of the Site is the mountain backdrop of Mount Nicholson;
- (b) the retaining wall along Stubbs Road is proposed to be partially trimmed down and integrated with the proposed garden with landscape works. The applicant provided justifications that further excavation seems infeasible to accommodate extra floor space as it would prolong development programme, traffic impact and that further large depth of bulk excavation would exceed the required limit and affect slope stability outside the Site and surrounding buildings; and
- (c) judging from the VIA submitted, stepped BH design in the upper floors of Block 1 would do some extent help soften the perceivable visual bulk arising from the increase in BH. According to the applicant, efforts have been made to allow wider building separations of about 10m to 20m from the adjoining buildings for enhancing air and visual permeability. The proposed increase in BH of about 18m is not anticipated to bring about significantly adverse visual impact as compared to the permissible building of 190mPD under the OZP. Nonetheless, given the large extent of Block 1, the applicant is advised to provide more design treatments to promote visual interest at the detailed design stage.

8.1.5 Comments of the Chief Architect/Central Management Division 2, Architectural Services Department (CA/CMD2, ArchSD):

- (a) it is noted that the proposed development consists of three tower blocks with height of 151.5mPD to 208.168mPD, which may not be incompatible to some adjacent developments at the north with similar height, including Rosaryhill School (about 203mPD) and Villa Monte Rosa (about 233mPD); and

- (b) nevertheless, it is noted that Block 1 is split into 3 levels (i.e. 199mPD, 203mPD and 208.168mPD) which is about 20% to 39.5% higher than the BHR of 190mPD with reference to G/F level at 144.018mPD and Block 1 is substantially higher than some immediate adjacent residential developments, including the Woodland Height (about 195mPD) and Bellevue Court (about 186mPD). He understood that the application will be considered holistically in a wider perspective, including the outstanding design merits of this application, such as its stepped building form and provisions of green roofs and terrace gardens; and
- (c) the proposed FTFH is considered reasonable and comparable to other similar hospital projects.

Landscape

8.1.6 Comments of CTP/UD&L, PlanD:

- (a) the Site is currently occupied by the HKAH. Medium to high residential buildings are found in the vicinity. A numbers of existing trees are found within and adjacent to the application site. The proposed redevelopment is considered not incompatible with the landscape setting in proximity;
- (b) according to the planning statement, 30 nos. of existing trees are proposed to be felled and no registered Old and Valuable Tree (OVT) is found within the Site. Based on the landscape proposal, various landscape treatments are proposed such as planting on flat roofs, edge planting on Block 2 and approximate 30 nos. of new tree planting mainly facing to Stubbs Road for future redevelopment. Given that significant impacts on the existing landscape resources and characters are not anticipated, they have no objection to the subject application; and
- (c) it is noted that enhancement works with proposed landscape treatment on the existing shortcrete slopes and retaining walls outside the site boundary will be partially modified. It is suggested that the applicant should seek agreement from relevant departments on the proposed slope enhancement works so as to avoid any misleading in formation in the application.

Environment

8.1.7 Comments of the Director of Environmental Protection (DEP):

- (a) no objection to the application from environmental planning perspective since no adverse environmental impact as a result of proposed redevelopment is anticipated;

- (b) having reviewed the SIA report, they have no further comment from sewerage planning perspective and consider in general that insurmountable sewerage impacts are not anticipated; and
- (c) it is noted that the applicant will carry out land contamination survey at the later stage, and contamination assessment and remediation, if required. In this connection, the applicant is reminded to duly follow the requirements under the prevailing guidelines published by EPD to carry out the land contamination assessment and remediation where applicable. In addition, 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. The following approval condition shall be incorporated:

the submission of a land contamination assessment in accordance with the prevailing guidelines and the implementation of the remediation measures identified therein prior to the proposed development to the satisfaction of DEP.

Building

8.1.8 Comments of the Chief Building Surveyor/Hong Kong East and Heritage, (CBS/HKE&H), BD:

- (a) no in-principle objection under the Buildings Ordinance to the subject planning application; and
- (b) if the applicant intends to apply for GFA concessions for green/amenity features and non-mandatory/non-essential plant rooms and services in the proposed new development in accordance with the SBDG as stipulated in Practice Notes for Authorized Persons, Registered Structural Engineers and Registered Geotechnical Engineers APP-151 and APP-152, detailed checking for compliance with the Buildings Ordinance would be made at building plans submission stage.

Geotechnical

8.1.9 Comments of Head of the Geotechnical Engineering Office/Civil Engineering and Development Department (H(GEO), CEDD):

- (a) no comment on the GPRR submitted and they concur with the conclusions in the GPRR that a natural terrain hazard study is required for the proposed development, and provision of required mitigation measures associated;

- (b) no geotechnical objection that further excavation would affect the slope stability and the surroundings; and
- (c) no in-principle geotechnical objection to the captioned application subject to the condition ‘the submission of a natural terrain hazard study and implantation of any necessary natural terrain hazard mitigation measures as part of the proposed development to the satisfaction of the Director of CEDD’.

8.1.10 Comments of Chief Highway Engineer/Hong Kong (CHE/HK), HyD:

- (a) no further comment on the application from highways maintenance viewpoints; and
- (b) the following is suggested to be included during the implementation of the modification works:

Before implementation of the slope modification works

- (i) 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 excess 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 H(GEO), CEDD, which include the installation of monitoring stations on the retaining wall(s) and subsequent base line survey;

During the implementation of the modification works

- (ii) 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

Remedial proposals for damaged slopes / retaining walls

- (iii) 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.

Licensing

8.1.11 Comments of the Director of Health (D of Health):

- (a) no comment on the application from the private hospital licensing perspective at this preliminary stage and there is no details on clinical services provided in the proposed development; and
- (b) the applicant is reminded 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.

8.2 The following departments have no comment on/objection to the application:

- (a) Chief Engineer/Hong Kong and Island, Drainage Services Department;
- (b) Project Manager/South, CEDD;
- (c) Director of Fire Services;
- (d) Chief Engineer/Construction, Water Supplies Department;
- (e) Commissioner of Police; and
- (f) District Officer (Wan Chai), Home Affairs Department.

9. Public Comments Received During Statutory Publication Period

- 9.1 The application and FIs were published for public inspection on 21.1.2020, 12.5.2020, 19.6.2020, 24.7.2020, 10.11.2020, 1.12.2020, 29.12.2020, 5.2.2021 and 23.3.2021. During the statutory public inspection, a total of 56 public comments (**Appendix III**) were received, including 42 opposing comments, 13 comments expressing concerns and a submission with no information provided.
- 9.2 The 42 opposing comments were submitted by the Incorporated Owners of Bellevue Court (seven submissions), Incorporated Owners of Villa Monte Rosa (four submissions including a submission with 155 signatures), Incorporated Owners of Woodland Heights (six submissions), the Incorporated Owners of Evergreen Villa, Rosaryhill school (two submissions), two Wan Chai District Council Members (Mr WONG Wang-tai (four submissions) and Ms Clara CHEUNG), and 17 companies/individuals. All 13 comments expressing concerns were submitted by individuals.
- 9.3 The major grounds of comments for opposing and expressing concerns are summarised below:
 - lack of justifications on the need for expansion and BH relaxation as the neighbourhood is served by other private hospitals and some services proposed are considered not necessary;
 - the redevelopment would cause adverse traffic impacts that would worsen the congestion at Stubbs Road and round-about there and the parking provision is considered excessive;
 - adverse visual and air ventilation impacts to neighbouring buildings; the

- proposed completion year of 2035 is considered unreasonably long and causing nuisance to neighbourhood relating to impacts on traffic, air, noise, tree preservation and slope stability due to construction;
- the relaxation in BH would lead to increase in PR and SC of which is considered not in line with the planning intention of inequitable to neighbouring residential developments with PR control on the OZP reflecting the existing condition;
- health and safety concerns as the hospital is in close approximate with the neighbouring developments; and
- lack of consultation with the neighbourhood and district council and insufficient time for the public to comment on the proposal.

10. Planning Considerations and Assessments

- 10.1 The application is to seek planning permission for minor relaxation of the BHR from 190mPD to 208.168mPD (+10% in terms of mPD or +40% in terms of absolute BH (i.e. 18.168m)) in the southern portion to facilitate the redevelopment of the HKHA. The Site is zoned “G/IC” which is intended primarily for the provision of GIC facilities serving the needs of local residents and/or a wider district, region or territory. The proposed redevelopment of HKAH, which is intended to upgrade the medical facilities to serve the community’s increasing demand for health care services, is considered in line with the planning intention of the “G/IC” zone.
- 10.2 The proposed redevelopment comprises Block 1 with a BH of 208.168mPD in the southern portion, and Block 2 with a BH of 171.3mPD and a lift tower with a BH of 151.5mPD in the northern portion. The BH of Block 1 has exceeded the BHR on the OZP for that portion of the Site by about 18m and thus minor relaxation of BHR is required.

Policy Aspect

- 10.3 As mentioned in paragraph 1.4 above, the minor relaxation of BHR can facilitate the HKAH to provide additional 96 beds, representing an increase of +71.11% over the existing number of beds (i.e. 135) and other additional services to enhance the capacity of medical services, which is to echo with the 2018 policy address regarding the enhancement of healthcare services in Hong Kong. The applicant has also reserved about two-fifth of bed spaces (i.e. 92 beds) for standard wards to alleviate public hospitals’ pressure. SFH points out that it is FHB’s policy to encourage private hospitals to make effective use of their sites and provide more beds to meet the rising demand for healthcare services and SFH supports in-principle the application.

Minor Relaxation of BHR

- 10.4 According to the applicant, the minor relaxation of BH of Block 1 is due to the requirement of a higher FTFH ranging from 4.3m to 4.8m for incorporation of modern medical facilities as well as associated electrical/mechanical services. Besides, further excavation is infeasible to accommodate more floor space as it would further prolong development programme and cause severe noise nuisance

and traffic impact to Stubbs Road which will be extremely disturbing to the residents nearby. In this regard, ArchSD considers the proposed FTFH is reasonable and comparable to other hospital development projects⁵. H(GEO), CEDD has no geotechnical objection that further excavation would affect the slope stability and the surroundings. In fact, one level of basement at Block 1 has already been proposed with a view to minimising the BH of Block 1. Furthermore, due to site constraint with the presence of large amount of existing slopes boarding the Site, the remaining buildable area within the Site is limited and adjustment of building footprint is restricted with a view to providing building separation between adjoining residential developments.

- 10.5 To minimise the possible visual impact, the applicant has proposed adopting various design elements including building separations from adjoining residential developments to enhance air and visual permeability, stepped height design, and provision of greenery and open space, such as green roof, terrace gardens on 12/F and 13/F of Block 1, and landscape gardens fronting Stubbs Road. CA/CMD2 of ArchSD considers that the proposed redevelopment may not be incompatible to some adjacent developments at the north with similar height. CTP/UD&L also considers that the proposed relaxation of the BH at the Site is not anticipated to bring about significant adverse visual impact as compared to the permissible building of 190mPD under the OZP. The existing medium-rise character of the local setting could be generally maintained. The design measures, as mentioned above, could provide better streetscape/good quality street level public urban space and providing separation between buildings to enhance air and visual permeability. It is noted that the current scheme can open up more space at ground level for landscape gardens for the enjoyment of the users of the hospital and is likely to shorten the construction period. In view of the above, it is considered that the proposed development generally meets the criteria (c) and (d) for minor relaxation of BHR as stated in paragraph 7.3 above.

Technical Aspects

- 10.6 On the traffic aspect, C for T considers that the proposed redevelopment would not induce insurmountable traffic impact onto the adjacent road network. To address C for T's technical concerns, approval condition as stated in paragraph 11.2(a) below is recommended. Similarly, other concerned departments including H(GEO) of CEDD and DEP have no adverse comments on the proposed redevelopment, and approval conditions on submission of Natural Terrain Hazard Study and land contamination assessment are recommended in paragraphs 11.2(c) and (d) below to address their technical concerns respectively.

⁵ FTFH of similar hospital developments are listed below for reference:

Kwai Chung Hospital Redevelopment	4.5m – 4.8m
Grantham Hospital Redevelopment	4.5m – 7m
Our Lady of Maryknoll Hospital Redevelopment	4.5m – 6m
Princess Margaret Hospital Redevelopment	4.5m – 6.3m

Public Comments

- 10.7 Regarding the opposing public comments, the planning assessments in paragraphs 10.3 to 10.6 above and the departmental comments in paragraph 8 above are relevant. Regarding the concern on the development period and potential nuisance to neighbourhood, the applicant has responded that the development period of 15 years is inclusive of all the administrative and planning work relating to planning application, lease modification and general building plans submission. In fact, the construction works for phase 1 is tentatively scheduled for commencement in 2023 with phase 3 completion in 2035. The construction period is comparable to other similar hospital redevelopment project⁶ which involves demolition and decanting of existing medical facilities. It is also considered that the improvement of health services through in-situ redevelopment by phase is essential to the operation of HKAH where the hospital will continue and focus on the provision of medical services for the community. In relation to the public comment on the applicant's failure in consulting the neighbourhood and district council, the applicant has explained that a public survey was conducted in June 2020 regarding the redevelopment of HKAH as mentioned in paragraph 2(q) above. Regarding the views on insufficient time for public to make comment on the applicant's proposal, the application and FIs submitted have been published for public comments in accordance with the provision under the Town Planning Ordinance.

11. Planning Department's Views

- 11.1 Based on the assessments made in paragraph 10 and having taken into account the public comments mentioned in paragraph 9, PlanD has no objection to the application.
- 11.2 Should the Committee decide to approve the application, it is suggested that the permission shall be valid until 14.5.2025 and after the said date, the permission shall cease to have effect unless before the said date, the development permitted is commenced or the permission is renewed. The following conditions of approval and advisory clauses are also suggested for Members' reference:

Approval Conditions

- (a) the submission of a revised Traffic Impact Assessment or Traffic Review, and implementation of the road improvement works identified therein (if any), to the satisfaction of the Commissioner for Transport or of the Town Planning Board;

⁶ Construction period of similar hospital redevelopment projects is listed below:

Grantham Hospital Phase I Redevelopment	5 years (2020 – 2025 (scheduled for completion))
Queen Mary Hospital Phase I Redevelopment	6 years (2018 – 2024 (scheduled for completion))
Kwong Wah Hospital Redevelopment	7 years (2019 – 2026 (scheduled for completion))
Kwai Chung Hospital Phase I to III Redevelopment	9 years (2016 – 2025 (scheduled for completion))
St. Paul's Hospital Phase I & II Redevelopment	11 years (2006 – 2017)

- (b) the design and provision of internal transport facilities for the proposed development to the satisfaction of the Commissioner for Transport or of the Town Planning Board;
- (c) the submission of a Natural Terrain Hazard Study and implementation of the mitigation measures recommended therein to the satisfaction of the Director of Civil Engineering or of the Town Planning Board; and
- (d) the submission of a land contamination assessment in accordance with the prevailing guidelines and the implementation of the remediation measures identified therein prior to the proposed development to the satisfaction of the Director of Environmental Protection or of the Town Planning Board.

Advisory Clauses

The recommended advisory clauses are attached at **Appendix IV**.

- 11.3 Alternatively, should the Committee decide to reject the application, the following reason for rejection is suggested for Member's reference:

the applicant fails to demonstrate that there are sufficient planning and design merits to justify the proposed minor relaxation of building height restriction.

12. Decision Sought

- 12.1 The Committee is invited to consider the application and decide whether to grant or refuse to grant permission.
- 12.2 Should the Committee decide to approve the application, Members are invited to consider the approval condition(s) and advisory clause(s), if any, to be attached to the permission, and the date when the validity of the permission should expire.
- 12.3 Alternatively, should the Committee decide to reject the application, Members are invited to advise what reason(s) for rejection should be given to the applicant.

13. Attachments

Appendix Ia	Application form received on 10.1.2020
Appendix Ib	Consolidated Report
Appendix Ic	FI received on 7.5.2021
Appendix II	Details of similar application
Appendix III	Public comments
Appendix IV	Advisory clauses

Drawing A-1	Block plan
Drawing A-2	Section plan
Drawing A-3	Building layout plan
Drawings A-4 to A-6	Phasing plans
Drawings A-7 and A-8	Landscape proposal
Drawings A-9 to A-14	Photomontages
Plan A-1	Location plan
Plan A-2	Site plan
Plan A-3	Aerial photo
Plan A-4	The existing and proposed building layout
Plans A-5 to A-7	Site photos

**PLANNING DEPARTMENT
MAY 2021**