Attachment A
Responses to Departmental Comments table

S.16 Planning Application No. A/H10/99 - Submission of Layout Plan and Proposed Minor Relaxation of Plot Ratio and Building Height Restriction for Permitted Flat at "Residential (Group C)7" zone at the Ebenezer School and Home for the Visually Impaired, 131 Pok Fu Lam Road, Pok Fu Lam, Hong Kong

Responses to Comments – Departmental Comments

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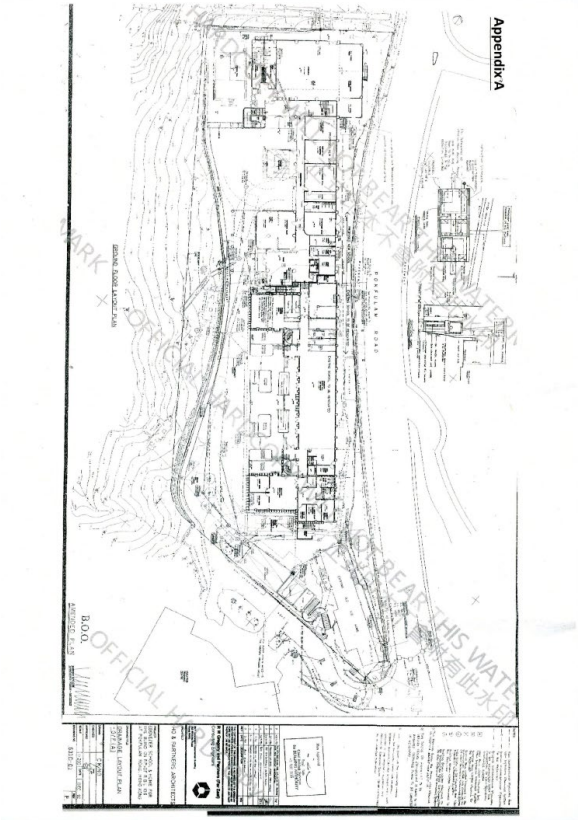
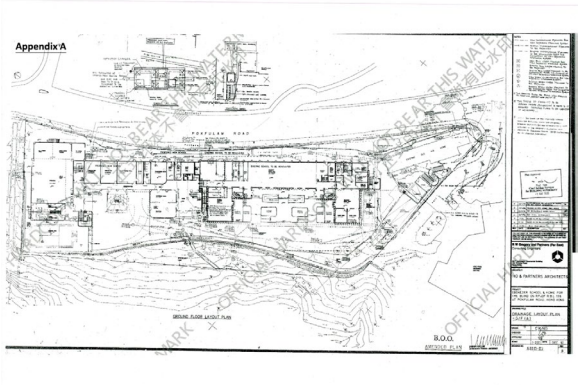
COMMENTS FROM RELATED DEPARTMENTS

No.	Comments	Responses
1.	**Buildings Department, New Buildings Division 1, Hong Kong West Section, dated 25 September 2026** (A) **General**	
	The proposal should be in all aspects complied with the Buildings Ordinance (BO). Any application for exempting/disregarding floor area from gross floor area (GFA) calculation under the Building Ordinance (BO) is subject to compliance with the pre-requisites under Practice Note for Authorized Persons, Registered Structural Engineers and Registered Geotechnical Engineers (PNAP) APP-151, the requirements of Sustainable Building Design Guidelines under PNAP APP-152, and the criteria and conditions for GFA concession under the relevant PNAPs and Joint Practices Notes (JPNs).	Noted.
	(B) **Specific comments on the applicant's claim in remarks [1], [2] and [3] in the development parameters table** (a) <u>GFA exemption for clubhouse</u>	
	For residential recreational facilities to be disregarded from GFA calculation under Building (Planning) Regulations (B(P)R), the applicant's attention is drawn to the requirements stipulated under PNAP APP-42 and APP-104.	Noted.
	(b) <u>GFA exemption for proposed carpark</u>	
	Areas of car parking spaces and loading and unloading may be disregarded from GFA calculation under B(P)R if they comply with the relevant requirements stipulated under PNAP APP-2. For GFA concession to aboveground carparking spaces under the BO, special attention is drawn to paragraph 7 of Appendix C thereof. For GFA concession to underground carparking spaces under the BO, special attention is drawn to paragraph 3 of Appendix C thereof.	Noted.

No.	Comments	Responses
	(c) **Dedication of Land for Public Footpath widening** The acceptability of the proposed dedication of setback area at street level in return of the claimed bonus plot ratio under the BO will be considered by the Building Authority upon formal building plan submission for approval as the claim will be assessed according to the special circumstances of the case in which comments from interested government departments will be collected. The applicant's attention is drawn to regulation 22 of B(P)R, PNAP APP-20 and APP-108 in this connection. **Other Detailed Comments (if applicable)*:** Detailed comments under the BO will be provided upon formal building plan submission to BD.	Noted. Noted.
2.	**Development Bureau, Works Branch, Works Division 1, Commissioner for Heritage's Office, Antiquities and Monuments Office, Heritage Conservation Unit, Historical Buildings Sub-unit, dated 29 September 2026** While no declared monuments, graded historic building, new item for grading assessment, or Government historic site identified by AMO is located within the application site, we are aware that the following four graded historic buildings (the "Graded Buildings") are located in the vicinity of the application site:- (i) Pok Fu Lam Conduit (Conduit Bridges and Inverted Syphon Piers) (Grade 2); (ii) Pok Fu Lam Conduit (Conduit Bridge No. 9) (Grade 2); (iii) Alberose, Nos. 132A & 132B Pok Fu Lam Road, Pok Fu Lam (Grade 2) and (iv) No. 128 Pok Fu Lam Road, Pok Fu Lam (Grade 3). For location, grading boundary and historic building appraisal of the Graded Buildings, please refer to the website of Antiquities Advisory Board (AAB)	Noted.

No.	Comments	Responses
	(https://www.aab.gov.hk/en/historic-buildings/search-for-information-on-individualbuildings/index.html).	
	According to the Guidance Notes for section 16 applications under the Town Planning Ordinance (Cap. 131), for applications involving particular uses or developments that may have implications on the environment, drainage, traffic, infrastructure, landscape and topography, etc., technical assessments will be required. To facilitate relevant technical assessments, we would like to invite the Applicant to supplement the relevant information in the appropriate section of the planning application with an assessment of the possible physical and visual impacts of the proposed development on the Graded Buildings and the proposed protective, mitigation and monitoring measures to avoid any adverse physical impacts.	The four Graded Buildings as listed are located further uphill, on the opposite site of Pok Fu Lam Road at a considerable distance from the Application Site (i.e. about 45m – 100m away). In addition, the Graded Buildings are shielded by existing buildings including Radcliffe, Royalton and Dor Fook Mansion. Moreover, the proposed maximum building height of 164mPD involves a minor increase in existing buildings at the Application Site. The proposed development remains lower building height than the residential towers to the immediate north of the Site across Pok Fu Lam Road including Royalton (216mPD), Radcliffe (216mPD), Dor Fook Mansion (182mPD). As such, the existing residential towers will maintain the physical and visual separation between the Graded Buildings and the proposed development. No physical and visual impacts on the Graded Buildings are envisaged.
	It is also noted that the Ebenezer Care & Attention Home (a.k.a. Old Age Home)(built in 1955), the Old Wing of Ebenezer School & Home for the Visually Impaired (built in 1962) and Carport (built in 1962)(the "Buildings") will be demolished under the proposed redevelopment. The Buildings are not declared monuments, graded historic buildings or new items for grading assessment by the Antiquities Advisory Board (AAB). In view of their decades of service to visually impaired in Hong Kong, the applicant is strongly advised to conduct comprehensive documentation of the Buildings (including 3D scanning, photographic and video recordings) prior to the commencement of any works and share them with AMO for archival, research, exhibitions and educational uses.	Applicant endeavours to document the history of the occupation of the Site through retaining records, photographic and video recordings, both to the interiors and exteriors of the existing buildings, and their setting. The Site is very significant to the development and operation of the Ebenezer School and Home for the Visually Impaired. It is intended that the history to be incorporated in a display at the new campus. A copy of relevant information can be provided to AMO for their records.
	If the subject application is approved by the Town Planning Board, AMO will provide further	Noted.

No.	Comments	Responses
	comments from the heritage conservation perspective on the works arising from the proposed development upon receipt of any referrals from the relevant departments under the current internal monitoring mechanism for the protection of the Graded Buildings. Please keep us posted of any further developments/updates of the subject application.	
3.	**Drainage Services Department, Operations & Maintenance Branch, Hong Kong and Islands Division, Western, dated 25 September 2026** i. Drainage Impact Assessment Section 2.4 of the report advised that surface runoff from the Application Site is currently conveyed to an existing natural stream flowing from northeast to southwest via internal drains which deviates from the building record plan (**Appendix A**). The consultant is required to clarify and supplement the change in discharge flow rate in each outlet/natural stream/cross-road drains. If there is any increase in flow rate, the consultant is required to supplement with the impact assessment for DSD and HyD's review and acceptance. **Appendix A** Appendix A.pdf	Since a greenery ratio of 20% is required to be adopted for the Proposed Development, the extent of unpaved area will be greater than that under the existing condition (16%). Therefore, the change in surface runoff discharged into the downstream drainage system is considered insignificant. The existing discharge point has been verified. The surface runoff from the application site is currently conveyed via the internal drainage system to the southern natural stream, which is same as the building record plan. The same discharge point will be retained for the proposed development to minimize the impact on the existing drainage system. Please refer to the Revised Drainage Impact Assessment (DIA) in **Annex A**.

No.	Comments	Responses
	  ii. Sewerage Impact Assessment There are proposed developments (e.g. HKU) in the vicinity. Please liaise with the interfacing parties, obtain the latest development parameters/sewage generation and update the SIA accordingly.	The parameters of interfacing parties have been reviewed and updated accordingly. Please refer to the revised Sewerage Impact Assessment (SIA) in **Annex B.**
4.	**Environmental Protection Department, Environmental Assessment Division,**	

No.	Comments	Responses
	Territory South Group, Hong Kong Island, dated 25 September 2026 **Sewerage Impact Assessment (SIA)**	
	1. It is noted that the SIA report submitted is the Jun 2024 revision, please confirm if the report is up to date with captioned s.16 application.	The revised SIA report in **Annex B** has been updated and the version submitted under this application is the latest version prepared for the captioned S.16 application.
	2. Please specify the target population intake year in the SIA report.	The target population intake year is 2034. Table 1 of the revised SIA in **Annex B** has been updated accordingly.
	3. In Table 1, the development parameters are inconsistent with that in the planning statement, i.e. bonus PR 0.041 and GFA 262.5 m2 are not included in the SIA report. Please clarify.	Table 1 of the revised SIA in **Annex B** has been updated accordingly.
	4. For Sections 2.3 and 4.1, please verify the design capacity of Sandy Bay PTW with DSD.	The capacity of the SBPTW has been determined with reference to the Project Profile for Harbour Area Treatment Scheme (HATS) Stage 2A prepared by DSD. Please refer to the revised SIA in **Annex B.**
	5. For Sections 2.6, 2.8, 3.6, 3.7, Appendices A & B, (i) A turnover rate of once every 6 hours is recommended for outdoor swimming pools in "General Specification for Swimming Pool Water Treatment Installation in Government Buildings of the Hong Kong Special Administrative Region 2017", please take this into consideration.	The turnover rate has been updated from 4 hours to 6 hours. Please refer to the revised SIA (**Annex B**).
	(ii) The maximum backwash volume should be calculated by [Design Flow for Swimming Pool Backwash per day (L/day) / Backwash duration (s/day)], please review and update the calculation accordingly.	Tables 4, 6, 9 and 10 of revised SIA (**Annex B**) have been updated accordingly. As there are seven swimming pools within the concerned catchments, it is considered unlikely that all seven swimming pools would undergo backwashing simultaneously during peak hours. Therefore, the following two scenarios have been considered to assess the potential impacts under different operating conditions: • **Scenario 1 – Peak-hour condition:** It is assumed that only one

No.	Comments	Responses
		swimming pool within the concerned catchments undergoes backwashing during peak hours. • **Scenario 2 – Off-peak condition:** It is assumed that all seven swimming pools undergo backwashing simultaneously during off-peak hours. Details please refer to Appendix A and B of the revised SIA in **Annex B.**
	6. For Appendices A & B,	
	(i) Please assign table number for differentiation.	Table numbers have been provided for Appendix A and B of the revised SIA in **Annex B.**
	(ii) Catchment E – Planned Development A/H10/94-1 has been established in 2026, please update the estimated flow and remarks.	Catchment E of Appendix A (Existing Condition) and Appendix B (Proposed Condition) has been renamed to "Residential Institution (Student Hostel)". The estimated flow and remarks have been updated in accordance with MPC Paper No. A/H10/94. Section 4.3 of the revised SIA in **Annex B** has also been updated accordingly.
	(iii) Catchment H – Middleton Towers will be redeveloped into student hostels under s.16 application A/H10/98A, please update the estimated flow and remarks.	Catchment H of Appendix B (Proposed Condition) has been renamed to "Residential Institution (Student Hostel) under S.16 Application A/H10/98A". The estimated flow and remarks have been updated in accordance with MPC Paper No. A/H10/98A. Please refer to the revised SIA in **Annex B.**
	(iv) Catchment T – Planned Development Lot No. RBL 757 has been established in 2022, please update the estimated flow and remarks.	Catchment T has been renamed to "138 Pok Fu Lam Road (RBL 757)". This catchment has been included in both Appendix A (Existing Condition) and Appendix B (Proposed Condition). Referring to the replies to initial written questions raised by Finance Committee Members in examining the Estimated of Expenditure 2021-22 published by DevB, RBL 757 has 3 nos. of flats. Please refer to the revised SIA in **Annex B.**

Responses to Comments – Departmental Comments

No.	Comments	Responses
	(v) Please review the population of: (a) Catchment C - HKJC PHAB Camp (b) Catchment I - Alberose (Old Alberose and New Alberose)	Catchment C – HKJC PHAB Camp and Catchment I – Alberose (Old Alberose and New Alberose) of Appendix A (Existing Condition) and Appendix B (Proposed Condition) of the revised SIA in **Annex B** have been updated accordingly.
	(vi) Please review the number of staffs making reference to regulations e.g. Cap. 132CA Swimming Pools Regulation, mandating 2 life saving attendants, and guidelines recommending staffing for residential block security, clubhouse, carpark etc. (a) Catchment J - Jessville Manor (b) Catchment K - Jessville Tower (c) Catchment L - Dor Fook Mansion (d) Catchment O - Radcliffe (e) Catchment R - Royalton (f) Catchment S - Royalton II	The no. of staff has been reviewed and updated accordingly in the revised SIA (**Annex B).**
	(vii) Please provide the sources for population of: (a) Catchment AH - No. 3 Sassoon Road Academic Building (b) Catchment U - No.5 Sassoon Road HKU HKJC Building for Interdisciplinary Research (c) Catchment V - No.7 Sassoon Road Patrick Manson Building (North Wing) (d) Catchment W - Proposed Development at No. 6 Sassoon Road (e) Catchment X - Wei Lun Hall (f) Catchment Y - Lee Hysan Hall (g) Catchment Z - The University of Hong Kong R.C. Lee Hall	The sewage flows of (d) Catchment W – Proposed Development at No. 6 Sassoon Road; (e) Catchment X – Wei Lun Hall; (f) Catchment Y – Lee Hysan Hall; (g) Catchment Z – The University of Hong Kong R.C. Lee Hall; (h) Catchment AA – Bay View Restaurant; and (i) Catchment AB – Madam S.H. Ho Residence for Medical Student were provided by EPD via. email on 28 November 2023. The sources for population of (a) Catchment AH – No. 3 Sassoon Road Academic Building; (b) Catchment U – No.5 Sassoon Road HKU HKJC Building for Interdisciplinary Research; (c) Catchment V – No.7 Sassoon Road Patrick Manson Building (North Wing); (j) Catchment AC – Dexter H.C Man Building; (k) Catchment AD – The University of Hong Kong Institute of Molecular Biology; (l) Catchment AE – The University of Hong Kong Estates

No.	Comments	Responses
	(h) Catchment AA - Bay View Restaurant (i) Catchment AB - Madam S.H. Ho Residence for Medical Student (j) Catchment AC – Dexter H.C Man Building (k) Catchment AD – The University of Hong Kong Institute of Molecular Biology (l) Catchment AE – The University of Hong Kong Estates Building (m) Catchment AF - Pauline Chan Building (n) Catchment AG - Victoria Road Fresh Water Service Reservoir	Building; (m) Catchment AF – Pauline Chan Building; and (n) Catchment AG – Victoria Road Fresh Water Service Reservoir have been provided.
	(viii) Please align the estimated number of persons per flat for Catchment B and M.	The estimated number of persons per flat for Catchment B and M have been aligned.
	(ix) Noted Catchment AB - Madam S.H. Ho Residence for Medical Student will be demolished under Catchment W – Proposed Development at No. 6 Sassoon Road, please eliminate sewage flow from Madam S.H Ho Residence in existing sewerage flow estimation to avoid duplication.	The catchment AB has been deleted from Appendix B (Proposed Condition) of the revised SIA (**Annex B**) accordingly.
5.	**Fire Services Department, Corporate Strategy Command, Planning and Development Division, dated 25 September 2026** Please be informed that I have no specific comment on the captioned application subject to water supplies for firefighting and fire service installations being provided to the satisfaction of the Director of Fire Services. Should the application be confirmed to fall under the regulatory regimes as stipulated in PlanD's memo dated 31.8.2023, i.e. lands, buildings, licensing and other control regimes, or be referred by Independent Checking Unit for consultation on FS requirements, we have no objection to removing the relevant approval conditions	Noted.

No.	Comments	Responses
	without the need for further consultation from FSD. Nonetheless, the following advisory clauses shall be delivered to the applicant: Detailed fire safety requirements will be formulated upon receipt of the formal submission of STT/STW, general building plans or referral of application via relevant licensing authority. Furthermore, the emergency vehicular access (EVA) provision in the captioned work shall comply with the standard as stipulated in Section 6, Part D of the Code of Practice for Fire Safety in Buildings 2011, which is administered by the Buildings Department.	Noted.
6.	**Highways Department, Bridges and Structures Division, General Section, General (Urban) Section, dated 25 September 2026** It is noted that the proposed works are in the vicinity of the existing highway structure H123. The applicant is requested to provide a structural impact assessment to demonstrate that the structural integrity of the existing highway structure concerned will not be adversely affected.	The proposed new pedestrian path does not involve any direct structural connection to the existing highway structure H123. The proposed works mainly comprise: 1. Extension of the existing carriageway to accommodate the proposed bus stop arrangement; and 2. Conversion of the existing footpath into part of the carriageway. As no direct loading or structural modification will be imposed on Highway Structure H123 from the new structure under the current scheme. Nevertheless, a detailed Structural Impact Assessment, including an assessment of the effects of the proposed works on the existing highway structure, will be carried out and submitted during the detailed design stage for the Highways Department's review.

No.	Comments	Responses
7.	**Highways Department, Urban Region, District and Maintenance Section (Hong Kong Office), District Section, dated 23 September 2026** 2. Please be advised that we have the following comments from highways maintenance viewpoint on the subject application: - **General Comments** (a) Please seek comment from TD on the proposed layby and 2m wide footpath dedicated for public passage; (b) It is noted that the maintenance walkway was an access within the subject site for the government staff and its agent or contractor to carry out inspection and maintenance of slope and structure. The maintenance walkway, falling within the private lot RBL 136 RP, is maintained by the lot owner at his own cost. Please confirm the above with reference to the concerned lease document. Upon confirmation, please clarify the M&M responsibility of the maintenance walkway and revise para. 5.2.3.1 of the Supporting Planning Statement accordingly. (c) It is noted that a structure would be proposed on top of a portion of the maintenance walkway for the 2m wide footpath dedicated for public passage. The proposed structure and the footpath dedicated for public passage, both falling within the private lot area of RBL 136 RP, shall be maintained by the lot owner at his own cost. (d) Please provide a M&M matrix of the proposed works to facilitate further understanding of the responsibilities among different parties; (e) If the proposed works would affect the existing public lighting, please seek comment from HyD Lighting Division.	Noted. Comments from TD has been received and shall be addressed in this RtoC Table. To provide a feasible bus lay-by with an associated public footpath of 2m wide, a structure is proposed on top of a portion of the maintenance walkway at +135.7mPD. The 2m-wide public footpath, the structure for the provision of the public footpath and the portion of maintenance walkway at +135.7mPD is proposed to be surrendered to the Government for public passage with the future M&M responsibilities to be taken up by TD and HyD. The remaining maintenance walkway at +135.7 mPD within the Lot No. RBL 136RP is confirmed to be managed and maintained by the Applicant at its own cost. Please refer to the revised para. 5.2.2.3 and 5.2.3.1 of the Revised Supporting Planning Statement (SPS) (**Annex C**) for the M&M responsibility of the maintenance walkway. Please refer to Table 5.1 of the Revised SPS (**Annex C**) for the proposed construction, management and maintenance matrix of the proposed improvement works. Noted. HyD Lighting Division shall be consulted at the further stage. Comments from HyD Lighting Division shall be duly addressed, if any.

No.	Comments	Responses
	Structural Maintenance Issues	
	(f) Please advise if there are any modification works to the existing highway structure H123. If affirmative, please provide further details for comment.	The proposed works involve the conversion of part of the existing pedestrian path into carriageway, which may require modification to elements associated with the existing highway structure H123. The extent of any modification works will be determined during the detailed design stage upon review of the available record drawings and, where necessary, verification of the existing site conditions.
	(g) The proposed works shall not adversely affect the structural integrity of the existing highway structure H123. It should be checked and certified by an Independent Checking Engineer and submit to HyD B&S Division for comment.	Noted. The proposed works will be designed and constructed such that the structural integrity, stability and serviceability of the existing highway structure H123 will not be adversely affected. A detailed Structural Impact Assessment will be prepared during the detailed design stage. The assessment will consider the effects of the proposed carriageway extension, conversion of the existing pedestrian path into carriageway, proposed retaining structure, infilling works and associated construction activities on H123. The assessment and the relevant design calculations will be checked and certified by an Independent Checking Engineer and submitted to HyD Bridges and Structures Division for comment before commencement of the relevant works.
	(h) The proposed works shall be structurally separated from existing highway structure H123 and allowance shall be made to movement of both structures.	Noted. All proposed structures adjacent to H123, including the new pedestrian path and retaining structure, will be structurally independent of and separated from the existing highway structure. No structural load will be transferred from the proposed structures to H123. An appropriate separation joint or clearance will be provided to accommodate the relative movement and differential settlement of the proposed and existing structures. The joint arrangement and movement allowance will be detailed and verified during the detailed design stage.

No.	Comments	Responses
	(i) It is noted that a retaining structure is proposed with infilling underneath the existing highway structure H123. Please ensure the following: -	
	i. The loading of infilling shall not impose additional loading to the bridge column and comment from HyD B&S Division shall be sought.	The extent, level, material and method of placement of the proposed infill will be developed during the detailed design stage. The potential effects on the existing bridge column and foundation will be addressed. The relevant assessment and design details, duly checked and certified by an Independent Checking Engineer, will be submitted to HyD Bridges and Structures Division for comment before commencement of the works.
	ii. The maintenance access to the column and soffit of H123 shall be maintained.	Noted. The proposed retaining structure, infilling and pedestrian path arrangement will be designed to maintain adequate access to the existing bridge column and soffit of H123 for inspection, maintenance and repair. No permanent works or infilling will obstruct the required maintenance access. The proposed access arrangement, including the necessary access route, headroom, working space and access openings, where applicable, will be shown on the detailed design drawings and submitted to HyD Bridges and Structures Division for comment.
	Slope Maintenance Issues	
	(j) It is noted that the applicant proposed to modify the existing slope Feature No. 11SW-C/C87 and construct a new retaining wall. The applicant shall seek comment from GEO for the proposed slope modification works.	Noted. GEO has been circulated for this Application and have no adverse comments to this Application (Item No. 10 of this Responses to Comments Table refers). Nonetheless, comments from GEO will be sought for the proposed slope modification works at the detailed design stage. It is clarified that the proposed works will only involve local modification to a portion of existing Slope Feature No. 11SW-C/C87, rather than modification of the entire slope feature, together with the construction of a new retaining wall. The relevant design details and assessment will be submitted to

No.	Comments	Responses
		GEO for review and comment at the detailed design stage.
	(k) The applicant shall take up the maintenance responsibility of the whole Feature No. 11SW-C/C87 during its modification and construction of proposed new retaining wall;	The Application shall take up the maintenance responsibility of the partially affected area of Feature No. 11SW-C/C87.
	(l) The applicant shall be responsible for informing GEO and SIMAR Unit for updating the SMRIS record due to the modification of Feature No. 11SW-C/C87;	Noted. The applicant will inform GEO and the SIMAR Unit of the local modification to Slope Feature No. 11SW-C/C87 and provide the necessary information for updating the SMRIS record upon completion of the works.
	(m) The modification works of Feature No. 11SW-C/C87 may consists of removal of soil nails and the applicant shall propose construction procedures and precautionary measures to prevent damage to the remaining portion of Feature No. 11SW-C/C87 and HyD Structure H123 located above it and seek comment from this office;	Noted. The potential removal of existing soil nails will be reviewed and confirmed during the detailed design stage based on the available record drawings and verification of the existing site conditions. Where removal of soil nails is required, detailed construction procedures, temporary works arrangements, monitoring requirements and precautionary measures will be developed to prevent adverse effects on the remaining portion of Slope Feature No. 11SW-C/C87 and the existing HyD Structure H123 above. The relevant proposal and assessment will be submitted to this office for review and comment prior to commencement of the modification works.
	(n) There is an existing toe channel along Feature No. 11SW-C/C87 to collect its groundwater through weep holes. The trimming of Feature No. 11SW-C/C87 and the construction of the new retaining wall shall ensure that groundwater is directed to a proper drainage outlet;	Noted. The existing toe channel and weep-hole drainage arrangement will be reviewed during the detailed design stage. The local trimming of Slope Feature No. 11SW-C/C87 and construction of the new retaining wall will incorporate suitable drainage provisions to collect groundwater and discharge it to a proper drainage outlet.
	(o) Since the 2.5m width maintenance walkway would serve for inspection and maintenance of Feature No. 11SW-C/C87, 24-hour and non-restricted access shall be provided to this Office; and	Noted. The detailed access arrangement, including any entrance gate and locking provisions, will be coordinated with this Office during the detailed design stage to ensure that inspection and maintenance access will not be obstructed.

No.	Comments	Responses
	(p) Adequate monitoring marker should be placed to monitor any movement or settlement of the feature and surrounding ground.	Noted. The monitoring requirement will be fulfilled. Adequate monitoring markers will be installed at suitable locations to monitor any movement or settlement of Slope Feature No. 11SW-C/C87 and the surrounding ground. The detailed monitoring arrangement will be developed during the detailed design stage.
	3. For issues in relation to development parameters in TIA, provision of car parking and L/UL spaces, run-in/run-out of the site, please seek comment from TD.	Noted. Comments from TD has been received and shall be addressed in this RtoC Table.
8.	**Highways Department, Railway Development Office, Railway Development Division 1-1, dated 28 September 2026** We have the following comments from the railway development point of view.	
	(1) Para. 4.5.1 of Appendix B on Traffic Impact Assessment – Please amend as "According to the approval given by the Chief Executive in Council in December 2025, the MTR Corporation Limited has commenced the detailed planning and design of South Island Line (West) (SIL(W)) project will be proceeded and the SIL(W) is targeted to be completed by year 2034."	Noted. Please refer to Para 4.5.1 in the revised Traffic Impact Assessment (TIA) **(Annex D)**.
	(2) As the subject site falls within the area of influence boundary of the proposed South Island Line (West), this Office shall be consulted on any update of this development in due course.	Noted.
9.	**Lands Department, Lands Administration Office, District Lands Office, Hong Kong West and South, dated 07 October 2026**	
	1. The application site falls within the Remaining Portion of Rural Building Lot No. 136 (the Lot) and within the Pokfulam Moratorium. The lease governing the Lot is virtually unrestricted in nature except (a) provision of a right of way from Pok Fu Lam Road; (b) prohibition of offensive trades; and (c) requirement to form paths	Noted.

No.	Comments	Responses
	of 12 feet in width along the north, west and south boundaries of the Lot.	
	2. The site area stated in Table 4.1 of the Planning Statement [i.e. 6,460m2 (about)] has not been checked. The applicant should ensure that the proposed development entirely falls within the Lot and would not encroach onto any adjoining Government land. The applicant is advised to refer to Lands Department (LandsD) Lands Administration Office Practice Note Issue Nos. 4/2008 and 1/2017 for information.	Noted.
	3. Para. 4.3.1.1 of the Planning Statement stated that footpath with a minimum 3m width to take forward the requirement in the lease is proposed. Para. 4.5.1.2 stated that the lease requirement of forming paths of 12 feet (i.e. about 3.66m) in width along the northern, western and southern boundaries of the Lot is also fulfilled. The architectural drawings in Appendix A of the Planning Statement do not indicate the width of the path required under lease. In view of the above, the applicant shall clarify the width of the proposed path for compliance checking under lease.	Noted, the Proposed Scheme incorporates a footpath of 12 feet in width along the northern, western and southern boundaries of the Lot to take forward the relevant lease requirement. Para. 4.3.1.1 of the revised SPS (**Annex C**) and the revised Architectural Drawings (**Annex E** refers) have been reviewed and updated accordingly.
	4. Para. 4.3.1.1 of the Planning Statement stated that a portion at the northern part of the application site (about 52.5m2) is reserved for dedication of setback area at street level for the purpose of public passage. Note [4] in Table 4.1 stated that a bonus plot ratio (PR) of about 0.041 will be claimed for the provision of dedication of setback area at street level for the purpose of public passage under the Building (Planning) Regulations 22(2) which refers to acquisition by the Government, either by agreement or by resumption under the Lands Resumption Ordinance (Cap. 124). Para. 5.2.2.3 stated that comments are being sought between Transport Department (TD) / Highways Department (HyD) on the future management and maintenance (M&M) responsibilities in which Note 7 of that	It is proposed to surrender the portion at the northern part of the application of about 52.5m^2 to the Government for public passage with the future M&M responsibilities to be taken up by TD and HyD. Para. 4.3.1.1 and Note [4] in Table 4.1 of the Revised Supporting Statement (**Annex C**) are revised accordingly.

No.	Comments	Responses
	para. stated that TD has expressed no objection in principle to take up the management responsibility of the newly formed widened footpath provided that, *inter alia*, the area would be surrendered to the Government. In view of the above, the applicant shall clarify whether their intention is to dedicate the setback area for public passage with the future M&M responsibilities to be taken up by the Lot owner or to surrender the setback area to the Government for public passage with the future M&M responsibilities to be taken up by TD and HyD subject to TD and HyD's agreement. Our further comments are reserved.	
	7. Subject to further clarification to be provided by the applicant as per my comment in para. 3 above, if the captioned s.16 application is approved by the Town Planning Board (TPB) and the proposal involves amendment to the paths under lease as referred to in para. 1(c) above, the Lot owner will need to apply to LandsD for a lease modification for implementation of the proposal. The proposal will only be considered upon receipt of formal lease modification application from the Lot owner. However, there is no guarantee that the lease modification application, if received by LandsD, will be approved. The lease modification application will be considered by LandsD acting in the capacity as the landlord at its sole discretion. In the event that the lease modification application is approved, it will be subject to such terms and conditions as the Government shall see fit, including among others, payment of premium and administrative fee as may be imposed by LandsD.	Noted. As abovementioned, the Proposed Scheme incorporates a footpath of 12 feet in width along the northern, western and southern boundaries of the Lot to take forward the relevant lease requirement. Nonetheless, the Applicant would proceed with relevant land administration formalities where necessary and appropriate.

No.	Comments	Responses
10.	**Planning Department, District Planning Branch, Special Duties Division, Urban Design & Landscape Section, Landscape Unit, dated 25 September 2026** 1. Our detailed comments are as follows: (i) based on the aerial photos taken in 2025, the Site was predominantly located in an area of residential urban fringe landscape character. The Site is surrounded by medium-rise residential developments, school/ university campus, hospital buildings and vegetated slope. The proposed development is considered not incompatible with the surrounding environment; (ii) with reference to the Tree Preservation Proposal submitted by the applicant, a total of 29 trees including three mature trees (DBH over 750mm) were identified within the application Site boundary. Among them a total 21 trees including 18 common species and three mature trees were proposed to be felled. The three mature trees were proposed to be felled as they grow on slopes with defects such as fungal infection, leaning, uprooting with low transplantation survival rate and average to poor health and structural conditions were observed. Outside the Site, 98 trees including one mature tree and one POVT were proposed to be retained, while nine trees of common species including three undesirable species would be felled; (iii) according to the applicant's Tree Preservation Proposal and the Landscape Master Plan, approximately 27new trees were proposed to be planted within the Site, which could meet a compensatory ratio of 1:1. The compensatory planting proposal was designed to provide for social interaction and bring people closer to nature. It will adopt a mixed planting approach, i.e. heavy standard sized trees for amenity and shading function with others planting such as shrubs,	Noted.

No.	Comments	Responses
	groundcovers and vertical greening etc., to provide backdrop to views from the interior communal space and maximise the area of visible greenery; and (iv) in view of the above, significant adverse landscape impact arising from this application is not anticipated; Advisory Comments 2. Approval of the application does not imply approval of tree works such as pruning, transplanting, felling and compensatory/ new tree planting. The applicant is reminded to seek approval for any proposed tree works from relevant departments prior to commencement of the works.	Noted, approval will be sought for the proposed tree works from relevant departments prior to commencement of the works.
11.	**Planning Department, District Planning Branch, Special Duties Division, Urban Design & Landscape Section, Urban Design Unit, dated 25 September 2026** Our key comments on the VIA and AVA-EE are as follows: VIA	
	(a) it is noted that the VIA was prepared based on TPB PG-No. 41 which has been streamlined and superseded by TPB PG-No. 41A. The "appraisal of visual changes" as mentioned in para. 7.3 should include "visual composition, visual obstruction and visual change" instead of "effect on public viewers and effect on visual resources". As such, the heading of paras. 7.8, 7.9, 7.15, 7.16, 7.22, 7.23, 7.29, 7.30, 7.36, 7.37, 7.43 and 7.44 should read "visual change";	Noted, the Visual Impact Assessment (VIA) report **(Annex F)** and the supporting figures have been updated in accordance with TPB PG-No. 41A.
	(b) to tally with those ratings as set out in the prevailing guidelines, the magnitude of changes should read "negligible" or "slight" instead of "low" or "small", and the resultant overall impact should read "slight" instead of "slight adverse";	Noted, the ratings for magnitude of change have been updated in accordance with TPB PG-No. 41A. Please refer to the revised VIA in **Annex F.**
	(c) the discussions on "construction stage" and the captions "Year 10" / "Year 1 no mitigation" of the photomontages of all VPs	Noted, the photomontages now show the existing and proposed schemes and where appropriate with and without the proposed

No.	Comments	Responses
	are more akin to the terminology used or required as set in EIAO GN. The relevant discussions in paras. 5.1 and 6.1 and the relevant photomontages could be removed;	HKU New Academic Building No.3 Sassoon Road. Please refer to the revised VIA in **Annex F.**
	(d) blank façade treatment of the proposed development should be avoided. The Consultant may wish to demonstrate the mitigation measures such as vertical greening and new tree planting as mentioned in para. 6.2 in the photomontages;	Noted, the photomontages prepared in support of the revised VIA (**Annex F**) has been updated to show the massing and form of the proposed scheme with the proposed window locations and landscape mitigation measures. Nonetheless, the Applicant will further consider the use of colour and finish for the architectural façade for the structures to minimise the prominence of the scheme at the detailed design stage.
	(e) Figure 3.1 – the layout shown in this figure does not tally with the layout plans in Appendix A – Architectural Drawings;	Noted the layout shown in Figure 3.1 of the revised VIA report **(Annex F)** has been updated in accordance with the revised Architectural Drawings **(Annex E).**
12.	**Planning Department, District Planning Officer, dated 25 September 2026** **Supporting Planning Statement** **Para 4.2.1.1** **DPO/HK's observations**	
	– The planning application is for a layout plan and proposed minor relaxation of PR from 1.9 to 1.941 and BHR from 151mPD to 164mPD for a proposed residential development.	Noted.
	– Is it observed that the development parameters table in the TIA and SIA are not consistent with those in the planning statement. Please rectify.	Noted. Please refer to updated Table 2-1 in the revised TIA (**Annex D**) and Table 1 in the revised SIA report (**Annex B).**
	Para 4.3.1.1 **DPO/HK's observations** The construction agent, M&M agent and the arrangements of the various bus layby and footpath of the proposed development are unclear. Please clarify the followings:	

Responses to Comments – Departmental Comments

No.	Comments	Responses
	(1) Please clearly state the construction agent and the M&M responsibility of the 14m x 2.75m bus layby.	The bus layby with be constructed by the Applicant, managed by TD and maintained by HyD. Please refer to Table 5.1 of the Revised SPS (**Annex C**) for the proposed construction, management and maintenance matrix.
	(2) The consultant should clearly describe the 2m wide footpath next to the layby, i.e. the proposed footpath with a minimum width of 2m is located within the private lot. A portion at the northern part of the Application Site (about 52.5m2 of Applicant's lot) is reserved for dedication of setback area at street level for the purpose of public passage.	Noted. Paras. 4.3.1.1 and 5.2.2.3 of the Revised SPS (**Annex C**) have been reviewed and supplemented accordingly.
	(3) Please clearly state that the footpath with minimum 3m width along the northern, western and southern boundaries of the lot is required under lease.	Noted. The footpath of 12-feet wide is incorporated in the Proposed Scheme to reflect the requirement under lease. Para. 4.3.1.1 of the Revised SPS (**Annex C**) has been reviewed and supplemented accordingly.
	(4) Please describe clearly or annotate on a plan marking which specific sections of the footpath are of a minimum width of 3m and which sections are 2m wide. **Para 4.3.2.1** **DPO/HK's observations** – Please provide plan(s) showing the proposed 20m building separation from Ebenezer New Hope School to enhance air ventilation, visual openness, daylight penetration and opportunities to improve the amenity of the area **Para 4.3.3.1** **DPO/HK's observations** – Please provide justifications for the proposed increase of building height from 151mPD permitted under the OZP to 164mPD.	Noted and annotated on the revised Architectural Drawings (**Annex E**). Noted and annotated on the revised Architectural Drawings (**Annex E**). The minor relaxation of BHR from 151mPD to 164mPD for permitted 'Flat' use at the Application Site is proposed to optimise the valuable land resources in support of the relocation of the Ebenezer School coupled

No.	Comments	Responses
		with the provision of planning and design merits for public benefits. The proposed relaxation is necessitated by a combination of site formation, contemporary residential design and technical requirements. In particular, the formation level of the proposed residential development has been raised from about 120mPD to 122mPD for Blocks T1 to T3 and to 125.4mPD for Block T4 to accommodate the site and engineering requirements, minimizing extensive excavation works required. In parallel, the domestic floor-to-floor height (FTFH) has been increased from 3.15m to 3.5m to reflect contemporary residential design standards and market expectations, with reference to comparable residential developments in Pok Fu Lam completed within the past 10 years and the prevailing FTFH of new residential developments of 8 to 25 storeys in Hong Kong. The enhanced FTFH would also allow greater flexibility for building services and internal environmental design, contributing to improved spatial quality and residents' wellbeing. The building height has also been carefully formulated having regard to the technical and site-specific requirements, including the necessary emergency vehicular access (EVA), vehicular access, greenery provision and building setbacks, which need to be accommodated within the Site's irregular and elongated configuration while enabling the permissible plot ratio under the OZP to be reasonably realised. Importantly, the proposed scheme incorporates a range of planning and design merits that provide wider public benefits, including compliance with the buffer area requirements under the HKPSG for air quality and noise mitigation; retention of the existing maintenance walkway to safeguard access to the existing highway structure and slope features; and provision of a proposed bus lay-by to facilitate public transport access. **Taking the**

No.	Comments	Responses
		above considerations, the proposed minor relaxation of the BHR to 164mPD represents a balanced design response that enables more effective use of valuable land resources while accommodating site and technical constraints, improving residential design quality and delivering tangible planning and public benefits. Nonetheless, the proposed minor relaxation in building height remains compatible with the existing and planned surrounding developments including the residential developments at the opposite side of the Pok Fu Lam Road ranging from about 192mPD to 227mPD and the planned adjacent "G/IC(1)" with a BHR of 164mPD. The existing stepped building height profile descending towards the seaside is maintained. Please refer to the revised section 5.3 and 5.4 of the revised SPS (**Annex C**) for the detailed justification of the minor relaxation of building height.
	– Please advise whether there would be any roof-top ancillary structures and their heights.	Subject to detailed design, roof-top ancillary structures may be needed to house mandatory/essential plant rooms. The height of the roof-top ancillary structures shall be controlled within 4.22m (i.e. 10% of the building height) in accordance with JPN-5 (i.e. not exceeding 10% of the building height).
	Para 5.2.2.1, 5.2.2.3 and 5.2.3.1 **DPO/HK's observations**	
	– Please provide sections/ structural drawings showing the interface between proposed bus-bay, footpath, highway structures and slope	Noted. Please refer to the supplementary information on the interface between proposed bus lay-by, footpath, highway structure and slope provided in **Annex G.**
	– It is noted from Drawings A-03 and A-09 that portions of the maintenance walkway may be covered, with pavement and run in/out access from PFLR above. Please annotate clearly the location and extent of	Noted. As indicated in **Annex G**, part of the maintenance walkway would be covered by the run-in out of the Application Site, proposed public footpath and open passage/footpath. Except the annotated

No.	Comments	Responses
	the covered portions in the sections/structural drawings. **Para 5.2.2.2** **DPO/HK's observations** – Please indicate clearly the footpath width (i.e. not less than 2m) **Para 5.2.3.1** **DPO/HK's observations** – The applicant should clarify the M&M responsibility of the maintenance walkway. It is noted that the 2.5m maintenance walkway falls within the lot and is part of the/atop the carpark/E&M block. **Para 4.2.1.2 And 6.1.1.3, Section X-X** **DPO/HK's observations** – As explained in previous Application no. A/H10/97 (MPC on 16.8.2024)[1], the proposed increase of BH from 151mPD in the s.12A application no. Y/H10/14 to 164mPD in s.16 application no. A/H10/97 was contributed by the rise of formation level from 120mPD to 122mPD for Blocks T1 to T3 and to 125.4mPD for Block T4, and the increase in domestic FTFH from 3.15m to 3.5m. [1] Agenda and Paper https://www.tpb.gov.hk/en/meetings/MPC/Agenda/748_mpc_agenda.html – These parameters in the current application no. A/H10/99 are consistent with those of the previous application. The applicant should clarify the justifications for the proposed minor relaxation of BHR.	covered portions, the rest of the maintenance walkway is open to above. Noted. Para 5.2.2.2 is updated accordingly in the Revised SPS (**Annex C**). Noted. Please refer to Table 5.1 of the Revised SPS (**Annex C**) for the proposed M&M responsibility. The portion to be surrendered to the Government for public passage is proposed to be maintained by HyD, while the remaining portion of the maintenance walkway shall be managed and maintained by the Applicant. As referred to the revised Architectural Drawings (**Annex E**), the portion to be surrendered is separated from the carpark/E&M block. Noted. The justification for the proposed minor relaxation of BHR have been reviewed and reflected in the revised section 5.3 and 5.4 of the revised SPS (**Annex C**).

Responses to Comments – Departmental Comments

No.	Comments	Responses
	Comments on VIA **Visual Impact Assessment** **Figure 4.2, 7.3, 7.4, 7.5, 7.6, 7.7, 7.8, 7.9, 7.10, 7.11** **DPO/HK's observations**	
	– Please provide photos of the latest surrounding environment. The photos shown are at least 3 years ago.	Please note the following on the photos adopted in the Figures of the revised VIA (**Annex F**): • Figure 4.2 – The existing views adequately demonstrate the prominence of the mountain backdrop and the visual containment of the Pok Fu Lam Road corridor and are therefore considered appropriate for the intended assessment purpose. • Figures 7.3 to 7.4 – Please note although there have been some new urban interventions visible in this view they do not affect the actual setting / immediate context of the Application Site and/or the conclusions of the visual impact assessment. • Figures 7.5 to 7.6 – Having revisited the VP again this view has not changed since the original photograph was prepared. • Figures 7.7 to 7.8 – New baseline photographs are provided for this VP showing the extension of Cyberport and the new park layout. It should be noted the view from the previous location is obscured by new tree planting in the park. • Figures 7.9 to 7.10 and 7.11 to 7.12 – Having revisited the VP again this view has not changed since the original photograph was taken.
	The following departments have no comments or no adverse comments: ● Director of Agriculture, Fisheries and Conservation (DAFC); ● Project Manager (South and Sustainable Lantau), Civil Engineering and	Noted.

No.	Comments	Responses
	Development Department (CEDD) (PM(SSL), CEDD); ● Head of Geotechnical Engineering Office, CEDD (GEO, CEDD); ● Director of Electrical and Mechanical Services (DEMS); ● Director of Leisure and Cultural Services (DLCS); and ● Commissioner of Police (C of P).	
13.	**Planning Department, District Planning Officer, dated 02 October 2026** 1. Please provide updates regarding the progress of relocation of Ebenezer.	The relocation of Ebenezer School to the new school and home at Tung Chung is progressing. The General Building Plan for the Tung Chung development has been approved by the Buildings Department and relevant authorities. The land exchange application is also in progress, and the Applicant is actively liaising with the relevant Government departments to facilitate the necessary procedures. Site investigation works are in good progress. Based on the latest programme, the new school and home at the Tung Chung site are targeted for completion by 2032. Notwithstanding the above progress, the relocation remains subject to the completion of the necessary statutory, land and development procedures, and students and residents of the Ebenezer will therefore need to continue using the existing premises for at least the next five years. As highlighted during the s.12A stage, the existing premises of Ebenezer School and Ebenezer NHS are ageing and increasingly constrained in meeting the needs of students and residents, including the provision of suitable and up-to-date facilities. There are also concerns regarding the condition and safety of the existing premises and their surrounding environment. It is therefore important to maintain momentum towards the timely

No.	Comments	Responses
		delivery of the new school and home in Tung Chung. In parallel, the approval of the current application would represent an important milestone in advancing the overall redevelopment and relocation arrangements, while facilitating the longer-term transition from the existing premises to the new facilities in Tung Chung.
	2. Please provide a photo with the annotation of the highway structure H123 and slope feature no. 11SW-C/C87.	Noted. Please refer to Figure A of **Annex G** for the photo with the annotation of the highway structure H123 and slope feature no. 11SW-C/C87.
	The following department has no comment on the application: • District Officer (Southern), Home Affairs Department (DO(S), HAD).	Noted.
14.	**Planning Department, District Planning Officer, dated 07 October 2026** For your information, a total of 153 public comments have been received for the application. You may wish to provide responses to the adverse public comments. The public comments are available for viewing at the Planning Enquiry Counters.	The public comments received are noted. Please refer to **Attachment B** of this Further Information Submission for the responses to public comments.
15.	**Planning Department, District Planning Officer, dated 09 October 2026** Further to my email dated 7.10.2026, the applicant may wish to further clarify remarks [4] of the development parameters table 4.1 of the planning statement: [4] According to the applicant, a bonus PR of about 0.041 (equivalent to a bonus GFA of about 262.5 m2), calculated by five times the area so dedicated according to PNAP-108, will be claimed for the provision of dedication of setback area at street level for the purpose of public passage under Building (Planning) Regulations (B(P)R) 22(2) for bus layby, geotechnical access and footpath, subject to approval by the Building Authority (BA) during detailed design stage.	It is proposed to surrender the portion at the northern part of the application of about 52.5m^2 to the Government for public passage with the future M&M responsibilities to be taken up by TD and HyD. Note [4] in Table 4.1 of the Revised Supporting Statement (**Annex C**) is revised accordingly. The Applicant is committed to closely liaise with relevant Government departments on the necessary land administrative procedures during the detailed design stage when applicable.

No.	Comments	Responses
	Whether the applicant has clarified with Lands Department and Buildings Department (and Transport Department) on the lease implication of the said claim for bonus PR.	
16.	**Social Welfare Department, Headquarters, Planning & Development Branch, Project Planning Section (Team 1), dated 30 September 2026** Ebenezer School and Home for the Visually Impaired ("ESHVI"), located at 131 Pokfulam Road, provide a range of education and rehabilitation services for the visually impaired, intellectually disabled and elderly including the Ebenezer Child Care Center (i.e. 32-place Special Child Care Centre service and a 8-place Residential Special Child Care Centre) and a Care and Attention Home ("C&A/AB") (i.e. 35 places for aged 60 or above female service users with residential care, meals, personal care and limited nursing care), under the subvention from Social Welfare Department ("SWD"). ESHVI also provides 10 self-financing service places at its C&A/AB. Besides, there are Ebenezer School and Ebenezer New Hope School under the purview of Education Bureau as well as some self-financed services such as the Early Intervention Program for Visually Impaired Children and ministry projects provided at the subject site. While SWD has no objection to application, the Government bears no liability or financial commitment for project development, demolition, construction, fitting-out, equipment, or relocation costs, etc. Ebenezer also acknowledged and agreed that land premium for the Tung Chung site will be determined by the Lands Department.	Noted.
17.	**Transport Department, Urban Regional Office, Traffic Engineering (HK) Division, Southern District and Peak, dated 29 September 2026** <u>Proposed Development Parameters</u> (1) The proposed development parameters as stated in Table 2-1 of the TIA is inconsistent with Table 4.1 of the Planning Statement. Please clarify.	Noted. Please refer to Table 2-1 in the revised TIA **(Annex D).**

<table>
<tr><th>No.</th><th>Comments</th><th>Responses</th></tr>
<tr><td></td><td>Existing Junction Performance

(2) With reference to Table 3-3, it is noted that the Design Flow to Capacity Ratio (DFC) at junction J4 at AM peak is 0.09 which is different from the assessed DFC of 0.29 in the previous TIA submission in year 2024. Please review.

Planned/Committed development

(3) For Table 4-3, please incorporate the traffic arising from the Proposed Residential Institution (Student Hostel) at Middleton Tower into the assessment.

Pedestrian Impact Assessment

(4) Please advise the pedestrian survey details including the date of survey, survey locations, etc. for reference.

(5) For Table 5-3, please advise the pedestrian flow to/from Ebenezer New Hope School.

(6) For para. 5.3.2 and Table 5-4, please provide the development details of Royalton and demonstrate that the pedestrian flow pattern by Royalton would be similar to the proposed development.

(7) The applicant should take into account the queuing space of bus passengers when assessing the effective width of footpath adjacent to the bus layby.</td><td>Please be clarified that the major road width "W" is corrected to 14.2m to comply with Appendix 1 of Chapter 4, TPDM Volume 2 in the revised TIA (Annex D).

Noted. The traffic arising from the Proposed Residential Institution (Student Hostel) at Middleton Tower is incorporated into the assessment. Please refer to the Table 4-3 and Chapter 5 in the revised TIA (Annex D).

Please be advised that the pedestrian survey was carried on 23 Jan 2026 (Friday) from 07:00 to 19:00. The footpath adjacent to the bus stop at Pok Fu Lam Road Northbound is surveyed. Please refer to Para. 5.3.1 in the revised TIA (Annex D).

Noted. Please refer to Table 5-3 in the revised TIA (Annex D).

Please see the comparison table below, which demonstrate that the development details of Royalton and the Proposed Development are similar.

<table><tr><td></td><td>Royalton I & II</td><td>Proposed Development</td></tr><tr><td>Total nos. of flats</td><td>46</td><td>135</td></tr><tr><td>Average size of flats</td><td>161 m^2</td><td>92.9 m^2</td></tr><tr><td>Location</td><td>Fronting to Pok Fu Lam Road</td><td>Fronting to Pok Fu Lam Road</td></tr><tr><td>Provision of Club House</td><td>Yes</td><td>Yes</td></tr></table>
Refer to Para. 5.3.5 to Para 5.3.7 and Table 5-5 in the revised TIA (Annex D), there will be only 4 nos. of bus passengers boarding or alighting during the peak 5-min, resulting in</td></tr>
</table>

No.	Comments	Responses
		LOS A at the footpath adjacent to the bus lay-by.
	(8) For Table 5-5 and Table 5-6, appropriate growth factor for pedestrian forecast from observed year should be adopted for assessment.	Noted. An annual growth rate of +1.0% per annum is applied to the pedestrian forecast. Please refer to Para 5.3.7, Table 5-5 and Table 5-6 in the revised TIA **(Annex D).**
	Layout Design	
	(9) Please provide the relevant swept path analysis for the proposed turning facilities at G/F near T4.	Please refer to Drawing 4F-SP2, GF-SP1 and GF-SP2 in Appendix B of the revised TIA **(Annex D)** for the swept path analysis at G/F near T4.
	(10) The applicant proposed to widen the section of the footpath between the relocated bus stop and the existing pedestrian crossing to 2.5m wide by setting back the site boundary in the last section 12A application No. Y/H10/14. However, this proposal is omitted in current submission. The applicant should review their design and incorporate the proposed footpath widening in the last section 12A application No. Y/H10/14 in the current submission.	Refer to Table 5-6, Para. 5.3.9 and Para 5.3.10 of the revised TIA (**Annex D**), LOS A can be maintained throughout the day even with the Proposed Development in place with the existing width of footpath. If the footpath is widened to 2.5m, it is required to reduce the carriageway width of Pok Fu Lam Road by around 0.5m, due to physical constraints such as the existing slope and access to maintenance walkway. Since LOS A can be maintained, it is considered more beneficial to maintain the existing footpath width, without narrowing the carriageway at Pok Fu Lam Road.
	(11) Please indicate the width of footpath adjacent to the taper of proposed bus layby.	Noted. Please refer to Figure 2-2 in the revised TIA (**Annex D**).
	(12) The Applicant should consider to provide a longer bus layby for accommodating two buses to minimise the potential obstruction of the traffic flow of Pok Fu Lam Road.	Refer to Para. 5.3.5 of the revised TIA (**Annex D**), there will be only 5-10 buses stopping at the relocated bus stop with the Proposed Development in place, i.e. around 1 bus per every 5-10 min. A longer bus lay-by for accommodating 2 buses is not essential in terms of the frequency of pick-up/drop-off activities of buses. If a longer bus lay-by is required for accommodating 2 buses, the bus lay-by will need to be further lengthen by 14m, i.e. a total of 48m including the taper, resulting in shorter separation between the bus lay-by and the run-in/out of the Proposed Development. A more extensive structure has to be constructed atop of the

No.	Comments	Responses
		maintenance walkway with more interface with the existing slope and highway structure.
	(13) The proposed traffic improvement works including the proposed bus layby should be carried out by the project proponent at their own cost and to the satisfaction of TD and HyD before completion of the construction of the proposed development.	Noted, the Applicant is committed to take up the construction of the traffic improvement works, including the proposed bus layby and the associated 2m wide public footpath, and shall liaise closely with TD and HyD during the detailed design stage on the traffic improvement works.
	(14) From the traffic engineering viewpoint, TD has no objection in principle to take up the traffic management responsibility of the completed bus layby provided that HyD would take up its maintenance responsibility.	Noted with thanks. Please refer to Table 5.1 of the Revised SPS (**Annex C**) for the proposed construction, management and maintenance matrix.
	(15) Please clarify the proposed management and maintenance responsibility for the proposed footpath adjacent to the bus layby and the proposed 2.5m width maintenance walkway to the existing slope features.	A portion at the northern part of the Application Site (about 52.5m^2 of the Applicant's lot) is proposed to be surrendered to the Government for the provision of the proposed footpath adjacent to the bus layby and a portion of the 2.5m wide maintenance walkway. The proposed footpath and the portion of the 2.5m wide maintenance walkway is proposed to be maintained by HyD while the remaining portion of the maintenance walkway shall be managed and maintained by the Applicant.
18.	**Water Supplies Department, New Works Branch, Construction Division, System Planning Section, dated 21 September 2026**	
	(1) there are existing water mains in the vicinity of the Site. The exact lines and levels of water mains should be established by hand dug trial pits on site if they are of significance to the works. Some changes might have been made to the information shown on the drawings in the course of time and that digging of trial holes to ascertain the exact alignment and depth of water mains would still be necessary before any road excavation.	Noted. The requirements for locating and verifying the existing water mains, including the monitoring requirements, will be fulfilled. The exact alignments and levels of the existing water mains in the vicinity of the proposed works will be verified by hand-dug trial pits where they may be affected by the works. Such verification will be completed before commencement of the relevant road excavation works, and suitable precautionary, protective and monitoring measures will be implemented to prevent damage to the existing water mains.

Responses to Comments – Departmental Comments

No.	Comments	Responses
	(2) Owing to the proximity of Pok Fu Lam Conduit, the applicant shall ensure that the maximum particle velocity and maximum amplitude of ground movement at the Pok Fu Lam Conduit due to blasting or pile driving operations shall not exceed 13mm/see and 0.1mm respectively as measured by a vibrograph.	Noted. The specified monitoring requirements will be fulfilled. Where blasting or pile-driving operations are required, vibration monitoring by vibrograph will be carried out at the Pok Fu Lam Conduit. Appropriate construction controls and precautionary measures will be implemented to ensure compliance with these limits.
	(3) If blasting is necessary, the applicant shall appoint a licensed shotfirer to carry out firing on the site and the maximum explosive charge weight per delay period of a blast at a given distance from waterworks installations/structures will be imposed on the blasting permit by the Commissioner of Mines.	Noted. If blasting is required, a licensed shotfirer will be appointed to carry out the blasting works on site. The blasting works will comply with the conditions of the blasting permit, including the maximum explosive charge weight per delay period imposed by the Commissioner of Mines, taking into account the distance from the relevant waterworks installations and structures.

(Last updated 29 October 2026)