

**Proposed Access (Inclined Lift) for the Existing Residential Development
in “Green Belt” and “Residential (Group C) 1” Zones
at No. 17 Bowen Road, Mid-Levels, Hong Kong**

(Pre-submission)

Comments	Responses
Comments from Antiquities and Monuments Office (Contact Person: Mr. LEUNG Yu Hin, Tel: 2655 0810)	
<p>The proposed application site is located in the close vicinity to a declared monument, namely the 21-Arch Section of the Bowen Aqueduct. Prior consultation with AMO should be made if there are any works, development, redevelopment or rezoning proposals that may affect the said declared monument and its immediate environs. Appropriate mitigation measures should be properly devised and implemented to ensure that the structural stability and integrity of the declared monument will not be adversely affected throughout the proposed works. AMO would provide comments on the proposed works from the heritage conservation perspective upon receipt of future departmental referrals.</p>	<p>Noted. The declared monument and its immediate environs will not be affected by the Proposal.</p>
Comments from Transport Department (Contact Person: Ms. Annie Ka-yuet TANG, Tel: 2829 5458)	
<p>It is understood that the proposed inclined lift is located away from public road connecting the RoW of the private lot and the lot itself not serving as a public access. TD therefore is not in a position to comment on the planning permission regarding the inclined lift within “GB” and “R(C)” zones on private and government land falling outside TD's management ambit.</p>	<p>Noted.</p>
<p>As per the traffic impact to Bowen Road, the applicant is reminded to consider the appropriate traffic and transport arrangements to support the construction of the proposed development under the given land conditions. Vehicles accessing certain section of Bowen Road or accessing Bowen Road via Bowen Drive must hold a valid restriction / prohibition zone permit where appropriate.</p>	<p>Noted.</p>

Comments	Responses
Comments from Highways Department (Contact Person: Ms. Iris S S CHEUNG, Tel: 2231 5618)	
(i) The loading and unloading of materials and machinery, the access path of the construction details should be provided to this office especially structural maintenance team for comment as HF10 is located at the vicinity of the construction site;	Noted. The relevant materials will be submitted in later stage when details of proposed works are available.
(ii) The proposed method statement including the foundation plan, Hoarding and Drainage Plan should be provided to this office to ensure the minimum disturbance to existing carriageway and footpath;	Noted. The relevant materials will be submitted in later stage when details of proposed works are available.
(iii) Bowen Road is currently a major jogging path at Peak, the proposed construction works should minimize the effect to the pedestrians and traffic flow to Bowen Road;	Noted.
(iv) Currently there is a mesh fence for providing security at Bowen Road, you should also seek comments from Police when the details of the proposed works have been ready for consideration.	Noted.
Comments from Environmental Protection Department (Contact Person: Mr. Kelvin Ki-fung CHOI, Tel: 2835 1594)	
(i) Estimated quantities of excavated materials, if any, to be generated from the proposed works;	Excavated materials will be generated mainly from erection of lift pit for proposed access lift. The estimated quantities are approximately 15m ³ (lift pit size: 5m x2m x1.5m) below ground level, comprising rock and soil. All excavated materials will be removed from site and properly disposed.
(ii) Any access road or haul road would be formed for the proposed works;	No access road or haul road will be formed for the proposed works.
(iii) Whether standard mitigation measures and good site practices for the construction works will be adopted.	Yes, and proper monitoring by consultant teams will be arranged to ensure standard mitigation measures and good site practices for the construction works will be adopted.
Comments from Geotechnical Engineering Office, Civil Engineering and Development Department (Contact Person: Mr. T.K. TSE, Tel: 2762 5384)	
It is noted that the maximum gradient across the site is greater than 15°. The applicant is required to submit a Geotechnical Planning Review Report (GPRR) in support of the planning application. The essential contents of a GPRR are given in the attached GEO Advice Note (Annex).	Noted. A GPRR (Appendix 3) has been conducted and enclosed for review.

Comments	Responses
<p>Comments from Drainage Services Department (Contact Person: Mr. Calvin Lo, Tel: 3101 2364)</p>	
<p>1. In principle, we have no adverse comment on the proposed access (Inclined Lift) works from the public drainage maintenance viewpoint. In addition, the Authorized Person (AP) of the applicant is reminded of the following general comments:-</p>	<p>Noted.</p>
<p>2. It is the developer's responsibility to identify/locate the existing government sewers and stormwater drains to which drainage connections from his site are to be proposed. The AP should verify the existence of any drains/sewers/utilities and also their exact locations, levels and alignments on site in order to ascertain the positions and levels of the proposed manholes and the associated connection works. The AP should also verify that the existing government drains/sewer, to which connections are proposed, are in normal working conditions and capable of taking the discharge from the site. Besides, for any excavation works over or in close vicinity to existing government drains/sewers, the AP should notify DSD in writing at least 14 working days before backfilling the excavation works and arrange joint site inspection with DSD prior to covering up.</p> <p>The AP is also reminded that any person wilfully, except with the permission in writing of the Authority, or negligently damages, alters, disconnects or otherwise interferes with any public sewer or drain or any connection therewith, shall be guilty of an offence under Section 6 of Public Health and Municipal Services Ordinance (Cap 132).</p>	<p>Noted.</p>
<p>3. This Department will only take over those public drainage facilities constructed on government land (except for right of way) with proper access, located downstream of the terminal manholes and falling outside the boundary of private lots / other facilities owned by other parties.</p>	<p>Noted.</p>
<p>4. The AP is required to liaise with relevant utility undertakers to obtain the latest records, plans and alignments of their utilities in order to ensure the feasibility of the proposed drainage works. The AP is also required to excavate inspection pits and conduct utility detection to verify the alignments of utilities shown in such utility records if considered necessary.</p>	<p>Noted.</p>

Comments	Responses
<p>5. Appropriate sedimentation tanks for proper treatment of site discharge should be provided, properly maintained and operated.</p>	<p>Noted.</p>
<p>6. Should any undue settlement or damage of the existing public drainage installations be detected, the piling/foundation/excavation works should be stopped immediately by the developer who shall report the matter to the Building Authority and this Department as soon as possible. In the event of any damage caused to the existing public drainage installations by the above works, the developer should be responsible for making good the damage at his own cost and to our satisfaction.</p>	<p>Noted.</p>
<p>7. Under the Water Pollution Control Ordinance (Cap 358), discharge of wastewater into stormwater drains is not permitted. The AP shall ensure that the proposed sewerage works shall convey all wastewater, including but not limited to those wastes generated by the domestic use of toilets, water closets, baths, showers, sinks, basins and other sanitary and kitchen fitments, through the sewage terminal manhole(s) to the public sewers. Besides, to ensure the sustainability of the public sewerage network, the AP shall ensure that the surface runoff within the development site will be collected and discharged via a stormwater drainage system and not be drained to the public sewerage network.</p>	<p>Noted.</p>
<p>Comments from Water Supplies Department (Contact Person: Mr. Terry LAW, Tel: 2152 5737)</p>	
<p>Please note that there are some existing fresh water mains within the site and are affected by the proposed development. Free access should be allowed for WSD at any time to carry out operation and maintenance of these water mains. In case the project proponent considers that diversion of these water mains is required, they should study the feasibility of diverting these water mains. If diversion is considered feasible, the project proponent should submit their proposal for WSD's consideration and approval. The water mains diversion work shall be carried out by the project proponent at their own cost to the satisfaction of WSD. WSD will only carry out the connection works to the existing network and the associated connection cost should be borne by the project proponent.</p>	<p>Noted.</p>

Comments	Responses
Comments from Fire Services Department (Contact Person: Mr. QIU Yi, Tel: 2733 5845)	
He has no specific comment on the proposal subject to fire service installations and water supplies being provided to the satisfaction of Director of Fire Services.	Noted.
Detailed fire safety requirements will be formulated upon receipt of the formal submission of general building plans.	Noted.
The provision of emergency vehicular access in the subject 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.
Nevertheless, should the proposed work affect any provision of emergency vehicular access to nearby buildings, the consultant should make a separate enquiry to his Department to ensure the feasibility of the work.	Noted. The emergency vehicular access to nearby buildings will not be affected by the Proposal.
Comments from Urban Design and Landscape, Planning Department (Contact Person: Ms. Vanessa TSANG, Tel: 3565 3942; Mr. NGAI Chak-man, Tel: 3565 3955)	
<u>Visual Aspect</u>	
2. According to the Supporting Planning Statement (SPS), the Site, with an area of about 89.6m ² , involves a proposed access (i.e. inclined lift, with a dimension of approx. 2.2m in height and 1.5m in width) and the associated works area. The proposed access with a length of about 32m is positioned adjacent to the existing gate at the lower section of the right of way (about +127.6mPD) extending to the platform of Caronia (about +146mPD). The applicant may wish to provide visual illustrations of the proposed access to support the claim of having “negligible physical and visual impact onto the surrounding area” in the “GB” zone.	Noted. Visual illustrations have been provided to support the claim of having “negligible physical and visual impact onto the surrounding area” (Figure 3.3 of SPS).
3. Our comments are made based on the existing available information of this pre-submission enquiry. We reserve our detailed comments upon receipt of the visual illustrations, if any.	Noted.

Comments	Responses
<p><u>Landscape Aspect</u></p> <p><u>General Comments</u></p> <p>2. Based on the aerial photo of 2024, the Site is located in an area of Residential Urban Fringe landscape character comprising woodlands within the “GB” zone, fitness trails, tennis courts and residential buildings. The proposed use is not entirely incompatible with the existing landscape character of the Site.</p>	<p>Noted.</p>
<p>3. With reference to para. 2.1.2, the Site is primarily a vegetated slope with portion occupied by a temporary manual conveying system. According to the aerial photo of 2024, there are some existing tree(s)/vegetation within the Site. The applicant stated that there will be no adverse landscape impact in para. 5.1.2. It is mentioned in the table under para. 4.4.1 that “only 1 no. of tree of common species will be affected” and the “affected will be transplanted in the immediate surrounding. However, no further information on tree survey, impact on existing trees/landscape resources and proposed mitigation measures/tree treatment is provided in the pre-submission. However, the tree proposed to be transplanted may be located on slope, the feasibility of obtaining a viable rootball and the tree location should be elaborated with tree survey information and tree photos. Moreover, the receptor site location should be indicated.</p>	<p>A Landscape Proposal and Tree Survey has been carried out and enclosed for review (Appendix 2 refers). Upon further review, a total of 11 nos. of tree have been identified within a 3m buffer of the Site. Amongst which, 5 nos. are proposed to be felled and 8 nos. of compensatory trees are proposed in the immediate surroundings. Please refer to the Appendix 2 for details.</p>
<p><u>Advisory Comments</u></p> <p>4. The applicant should be advised that 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.</p>	<p>Noted.</p>
<p>5. The applicant is reminded that approval of the application does not imply approval of the site coverage of greenery requirements under BD’s PNAP APP-152. The site coverage of greenery calculation should be submitted separately to BD/LandsD for approval.</p>	<p>Noted.</p>

Comments	Responses
Comments from Electrical and Mechanical Services Department (Contact Person: Mr. Henry CHEUNG, Tel: 2808 3692)	
<p><u>Electricity Safety</u></p> <p>Please be advised that he have no particular comment on the document from electricity supply safety aspect. However, in the interests of public safety and ensuring the continuity of electricity supply, the parties concerned with planning, designing, organizing and supervising any activity near the underground cable under the mentioned document should approach the electricity supplier (i.e. HK Electric) for the requisition of cable plans to find out whether there is any underground cable within and/or in the vicinity of the concerned site. They should also be reminded to observe the Electricity Supply Lines (Protection) Regulation and the “Code of Practice on Working near Electricity Supply Lines” established under the Regulation when carrying out works in the vicinity of the electricity supply lines.</p>	<p>Noted. Relevant electricity supplier will be contacted in later stage when details of proposed works are available.</p>
Comments from Hong Kong Police Force (Contact Person: Mr. LUI Che-ho, Philip, Tel: 2860 1003)	
<p>The construction company must provide staff to regulate on-site traffic.</p>	<p>Noted. Staff to regulate on-site traffic will be provided.</p>
<p>Construction vehicles should not be parked outside the site in a way which causes obstruction or blockage of the road.</p>	<p>Noted.</p>
Comments from Lands Department (Contact Person: Ms. Phoebe TAI, Tel: 2835 1635)	
<p>2. The proposed inclined lift and the associated works (“Proposed Access Lift”) falls within portion of Inland Lot No. 2460 (“the Lot”) and part of the right of way designated for the Lot under lease (“the Right of Way”). The Lot is held under a Government lease for a term of 75 years from 24.12.1923 renewable for 75 years. According to the lease conditions, development on the Lot is restricted to one house of European type with a maximum height of thirty five feet and its exterior elevation and disposition require approval under lease. Besides, the Lessee shall construct a road or path within the Right of Way and shall uphold and maintain such road or path and everything forming portion of it or appertaining to it to the satisfaction of Director of Public Works.</p>	<p>Noted.</p>

Comments	Responses
<p>3. Apart from the above, the Proposed Access Lift also falls within Government land and would affect Slope Feature No. 11SW-D/1400 maintained by the owner of the Lot. The area of the Proposed Access Lift as stated in para. 4.1.1 of the PS i.e. approx. 86.2m², is subject to survey and our comment on such is reserved.</p>	<p>Noted. Please be clarified that the Development Site Area as stated in para. 4.1.1 of SPS is approx. 89.6m².</p>
<p>4. According to para. 3.1.1 of the PS, the Proposed Access Lift provides a barrier-free access to enhance accessibility for the residents of the Lot. In this regard, advice from relevant departments, including TD and BD should be sought. Besides, as the Proposed Access Lift would affect the existing slope, expert advice from GEO, CEDD and SMS, Lands D should be sought as to whether the Proposed Access Lift would adversely affect the slope stability. Subject to the advice of relevant B/Ds, the Roads (Works, Use and Compensation) Ordinance (Cap. 370) may need to be invoked in order to effect the Proposed Access Lift. In this connection, subject to para. 6 below, the applicant has to but all relevant costs (e.g. Government administrative costs and compensation) for processing the Proposed Access Lift, under Cap. 370.</p>	<p>Noted.</p>
<p>5. While the applicant has not mentioned the future maintenance and management of the Proposed Access Lift subject to para.6 below, the applicant (i.e. the Lot owner) should take up the responsibilities of maintenance and management of the Proposed Access Lift including the portion / area falling within Government land.</p>	<p>Noted.</p>
<p>6. The Proposed Access Lift to be erected within the Lot, the Right of Way and the adjacent Government land is considered non-compliance with the lease conditions. If planning application is approved, the owner of the Lot needs to apply for a lease modification and/or other appropriate land documentation to implement the subject proposal. However, we must stress that there is no guarantee that such application will be approved, and if such application is approved by this department, acting in its capacity. as the landlord, at its discretion, it will be subject to such terms and conditions, including payment of premium and fees as imposed by this department.</p>	<p>Noted.</p>

Comments	Responses
Comments from Buildings Department (Contact Person: Ms. Rita LEE, Tel: 3106 8265)	
Detailed comments on compliance with the Buildings Ordinance and allied regulations will be given upon formal building plans submission.	Noted.
For the general building plan submission of the related structure, under normal procedures, BD (as the focal point of Centralizing Processing System) will forward the submission to all relevant departments for seeking comments within their respective jurisdictions.	Noted.

Compiled by: KTA Planning Limited
Date: 17 March 2026