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

(Application No. A/H12/30)

<table>
<tr><th>Comments</th><th>Responses</th></tr>
<tr><td colspan="2">Comments from Hong Kong District Planning Office, Planning Department
(Contact Person: Mr. Ronald CHAN; Tel: 2231 4913)</td></tr>
<tr><td>(1) The existing ROW illustrated in Figure 2.1 of the Planning Statement is different from the ROW on the lease plan. Please rectify. Please also explain whether the original ROW would be surrendered/replaced by the proposed inclined lift system. And the current staircase on G.L. would be re-instated.</td><td>The current proposal is intended to facilitate the re-alignment of existing RoW, which will be partially replaced by the proposed inclined lift and existing staircase. Details of the re-alignment proposal are subject to further discussion and negotiation with relevant B/Ds in the subsequent land administration stage.

The extent of ROW has been updated in Figure 2.1 and 2.3.

(Annex A refers)</td></tr>
<tr><td>(2) As stated in para 3.1 of the Planning statement, the length of the inclined lift is 32m. Also, as stated in Appendix 3 GPRR, the application site is 2.4m in width and 38m in length.

Please explain the reasons to position the lower end of the inclined lift track at +127.6mPD, how it is qualified as a barrier-free access, and the total site area.</td><td>Noted. Para 2.1 of GPRR has been updated.

With the intention to minimise any potential impact on the declared monument (i.e. 21-Arch Section of the Bowen Aqueduct), the lower end of the inclined lift track is strategically positioned away from Bowen Road and located adjacent to the existing gate alongside the RoW. This is to provide easier access to the Caronia, but not to fulfil any statutory or non-statutory regulations on BFA provision. The current proposal strikes a balance between accessibility & convenience and preservation of declared monument, whilst addressing TPB's previous concerns.

(Annex B refers)</td></tr>
<tr><td>(3) With reference to the inclined lift system at Tai O Heritage Hotel mentioned in the GPRR, the applicant is required to provide further information on the necessary facilities/installations of the proposed inclined lift (e.g. dimension of landing platforms, gross dimensions of the lift compartment together with maintenance footpath and boundary fences alongside the lift track, etc.), and thus the total area required.</td><td>Details of necessary facilities/installations of the Proposed Inclined Lift are as follows:

<table><tr><th></th><th>Dimension / Area (about)</th></tr><tr><td>Lift compartment</td><td>1.2m (w) x 1.5m (l) x 2.2m (h)</td></tr><tr><td>Landing platform (aboveground)</td><td>2m x 2m</td></tr></table></td></tr>
</table>

<table>
<tr><th>Comments</th><th>Responses</th></tr>
<tr><td></td><td>
<table>
<tr><td>Boundary fences and maintenance footpath (along both sides of track)</td><td>Height: 1.1-1.5m (perforated)
Area: 70m^2</td></tr>
<tr><td>Total work area required</td><td>89.6m^2</td></tr>
</table>
* Subject to further review in the subsequent detail design stage
</td></tr>
<tr><td>(4) The applicant should provide illustrations/samples to demonstrate the sensitive design features to minimize visual impact and ensuring compatibility with the surrounding environment, including compact size of lift, the use of non-reflective materials, natural colour scheme and glassy compartment, etc. as claimed in paragraph 3.3.1 of the Planning Statement.</td><td>The reference local projects and sensitive design features are provided at Annex C for reference. As shown in Annex C, various sensitive design features, including compact size of lift, the use of non-reflective materials, natural colour scheme, are technically feasible and capable of minimising visual impact and ensuring compatibility with the surrounding environment.

(Annex C refers)</td></tr>
<tr><td>(5) The applicant claimed to transport the construction material and plants from adjoining Lot IL2304 that is owned by the applicant in paragraph 3.4 of the GPRR. However, according to our records, IL2304 is not owned by the applicant. Please clarify.</td><td>Noted. Para 3.4 of GPRR has been updated.</td></tr>
<tr><td colspan="2">Comments from Urban Design and Landscape Section, Planning Department
(Contact Person Ms. Vanessa TSANG, Tel: 3565 3942)</td></tr>
<tr><td>(i) the Site and the proposed inclined lift have not been clearly delineated in Figure 3.3; and</td><td>Noted. Figure 3.3 of SPS has been updated.</td></tr>
<tr><td>(ii) it is noted that the Site is located in close vicinity to a declared monument, namely the 21-Arch Section of the Bowen Aqueduct. The applicant should make reference to Section 1.2a of the HKPSG and seek AMO’s comments/advice regarding respecting the architectural style or notable features of the neighbourhood.</td><td>Section 1.2a of the HKPSG is noted. AMO’s comment has been sought during the pre-submission stage.</td></tr>
<tr><td colspan="2">Comments from Highways Department
(Contact Person: Ms. Iris S S CHEUNG, Tel: 2231 5618)</td></tr>
<tr><td>(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 (Bowen Road) is located at the vicinity of the construction site;</td><td>Noted. The relevant materials will be submitted in later stage when details of proposed works are available.</td></tr>
</table>

Comments	Responses
(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; and	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, the proposed construction works should minimize the effect to the pedestrian and traffic flow to Bowen Road.	Noted.
Comments from Antiquities and Monuments Office (Contact Person: Mr. LEUNG Yu Hin, Tel: 2655 0810)	
There are no declared monuments, graded historic buildings nor new items pending grading assessment in the application site. However, the proposed access is located in the close vicinity to a declared monument, namely the 21-Arch Section of the Bowen Aqueduct. The project proponent should assess whether the proposed project has any direct or indirect impacts on the said declared monument and its immediate environ. If affirmative, appropriate mitigation measures agreed with AMO 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 detailed works proposal.	In terms of physical impact, the Application Site (and proposed inclined lift) has a minimum buffer distance of approx. 16.5m from the declared monument, and that all construction materials and plants will not be transported via the declared monument. In addition, the construction works will not pose any adverse structural implication to its surrounding environments, and that comprehensive monitoring measures will also be deployed throughout the duration of construction. Also, as demonstrated in the photomontages (Figure 3.3 of SPS), the proposed inclined lift will be largely or even completely shielded off by the existing vegetation when viewing from different locations along Bowen Road. The proposed sensitive design measures would further mitigate and minimise any remaining visual impact to a negligible level. In this regard, the proposal is not envisaged to induce any direct or indirect impacts on the declared monument and its immediate environs. Nonetheless, consultation with AMO will be made should there be any potential impact found in the later stages.

Encl.
Annex A - Updated Supporting Planning Statement
Annex B - Replacement Pages of Geotechnical Planning Review Report
Annex C - Reference Local Projects and Sensitive Design Features
Annex D - Responses-to-Comments Table (Pre-submission Stage)

Compiled by: KTA
Date: 23 June 2026

Annex A

Updated Supporting Planning Statement

S16 PLANNING APPLICATION
APPROVED MID-LEVELS EAST OZP No. S/H12/14

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

SUPPORTING PLANNING STATEMENT

June 2026

Applicant:
Sydney Fung & Son Limited

Consultancy Team:
KTA Planning Ltd.
Fruit Design & Build Limited
LanDes Limited
Green Engineering Consultant Company Limited

PLANNING LIMITED
規劃顧問有限公司

Executive Summary

This Supporting Planning Statement is prepared on behalf of Sydney Fung & Son Limited ("the "Applicant") to seek approval from the Town Planning Board ("TPB") under Section 16 of the Town Planning Ordinance for Proposed Access (Inclined Lift) for the existing residential development at No. 17 Bowen Road, Mid-Levels, Hong Kong (the "Site"). The Proposed Access occupies a site area of about 89.6m^2, falling within an area partly zoned "Green Belt" ("GB") and "Residential (Group C) 1" Zones ("R(C)1") on the Approved Mid-Levels East Outline Zoning Plan (the "Approved OZP") No. S/H12/14.

The Proposed Access involves installation of an inclined lift (about of 32m in length) and the associated works area. This is to provide a safe and convenient access next to the existing Right of Way to the existing permitted residential development at IL 2460, namely Caronia. The proposed inclined lift is small in size and minimal in scale, featuring a compact design with a dimension of approx. 2.2m in height and 1.5m in width. Sensitive design measures, such as non-reflective surface and natural colour scheme, will be incorporated to minimise potential visual and physical impact to the surrounding environment.

The Proposed Access is fully justified based on the following main reasons:

- The Proposed Access is small in size and minimal in scale;
- The Proposed Access is compatible with surrounding environment;
- The Proposal will not adversely affect public amenity and declared monument;
- There will be no adverse visual impact;
- There will be no adverse landscape impact;
- The Proposal is in line with Town Planning Board Guidelines for Application for Development within Green Belt Zone;
- The Proposed Access will enhance accessibility;
- The Proposal has incorporated various adjustments to address TPB's previous concerns;
- Approval of the Planning Application would be consistent with TPB's previous decisions on similar applications; and

In light of justifications given throughout the Supporting Planning Statement, we sincerely request the TPB to give favourable consideration to this Planning Application.

行政摘要

（內文如有差異，應以英文版本為準）

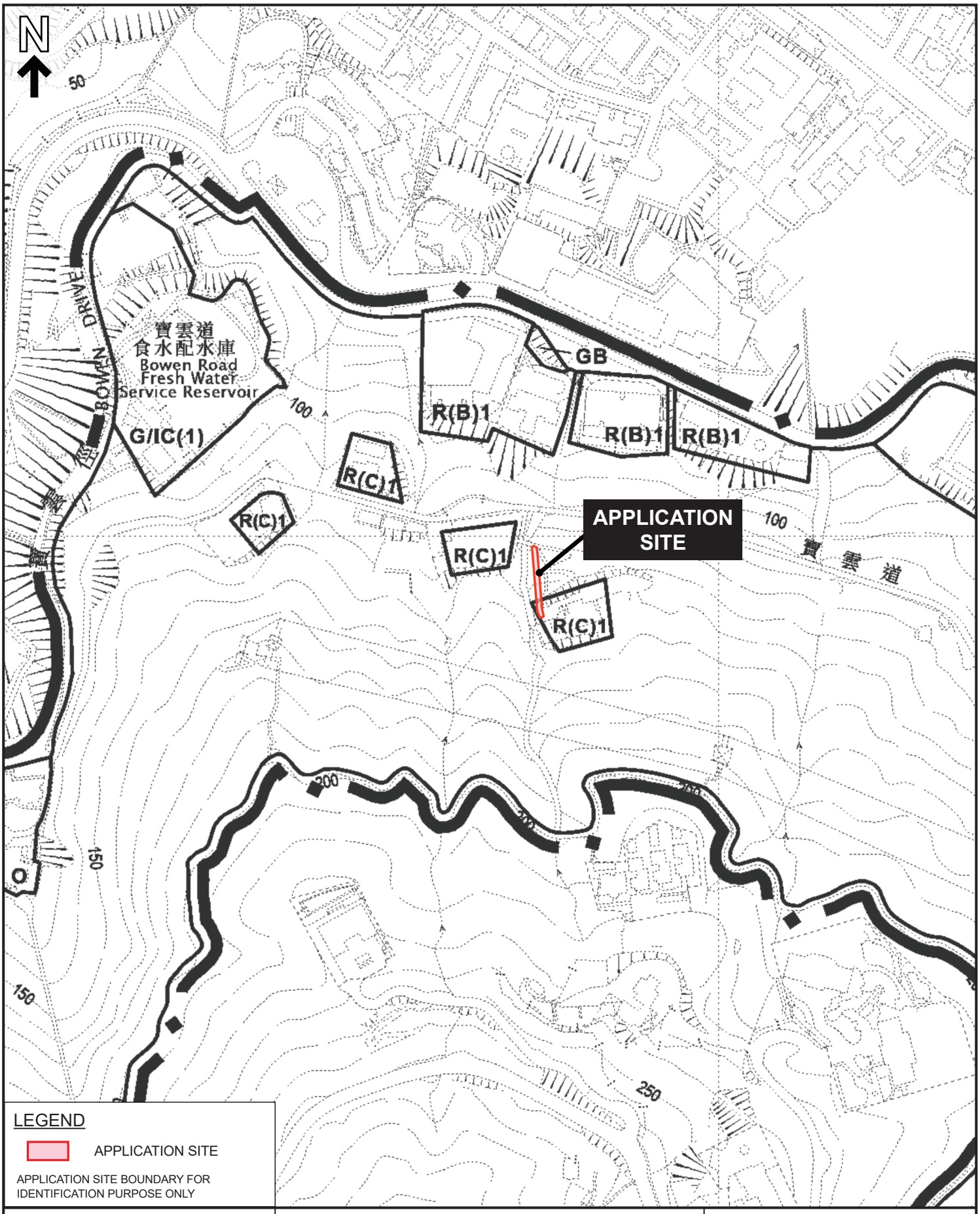
本規劃申請書是代表申請人Sydney Fung & Son Limited（下稱「申請人」）根據城市規劃條例第 16 條，向城市規劃委員會（下稱「城規會」），就擬議通路(斜道升降機)提出規劃申請。申請地點位於半山區寶雲道 17 號（下稱「申請地點」）並位於半山區東部分區計劃大綱核准圖（下稱「核准圖」）編號 S/H12/14 的「綠化地帶」及「住宅(丙類)」地帶內。申請地點的面積將約 89.6 平方米。

擬議方案僅涉及安裝一條約 32 米長的斜道升降機及相關施工區域，旨在為位於內地段 2460 號的現有住宅「Caronia」提供必要的無障礙通道。擬議斜道升降機體積小，規模輕微，並採用緊湊設計，尺寸約為 2.2 米高及 1.5 米寬。為減低對周邊環境的潛在視覺及實質影響，擬議斜道升降機將採用敏感的設計措施，包括非反光表面及自然色調配色。

擬議通路有充份理據支持，其主要理據如下：

- 擬議通道體積小及規模輕微;
- 擬議通道與周邊環境相容;
- 不會對公共設施及法定古蹟造成不良影響;
- 不會產生不良視覺影響；
- 不會產生不良景觀影響；
- 擬議通道符合城市規劃委員會規劃指引編號 10 「擬在綠化地帶進行發展而按照城市規劃條例第 16 條提出的規劃申請」；
- 擬議通道將提高可達性；
- 擬議方案已納入多項調整，以解決城規會先前的擔憂；
- 批准本規劃申請與城規會之前考慮同類型規劃申請的決定一致；及

基於以上各項規劃理據，申請人希望是次的規劃申請能獲城規會支持。



LEGEND

APPLICATION SITE

APPLICATION SITE BOUNDARY FOR IDENTIFICATION PURPOSE ONLY

KTA PLANNING LIMITED
規劃顧問有限公司

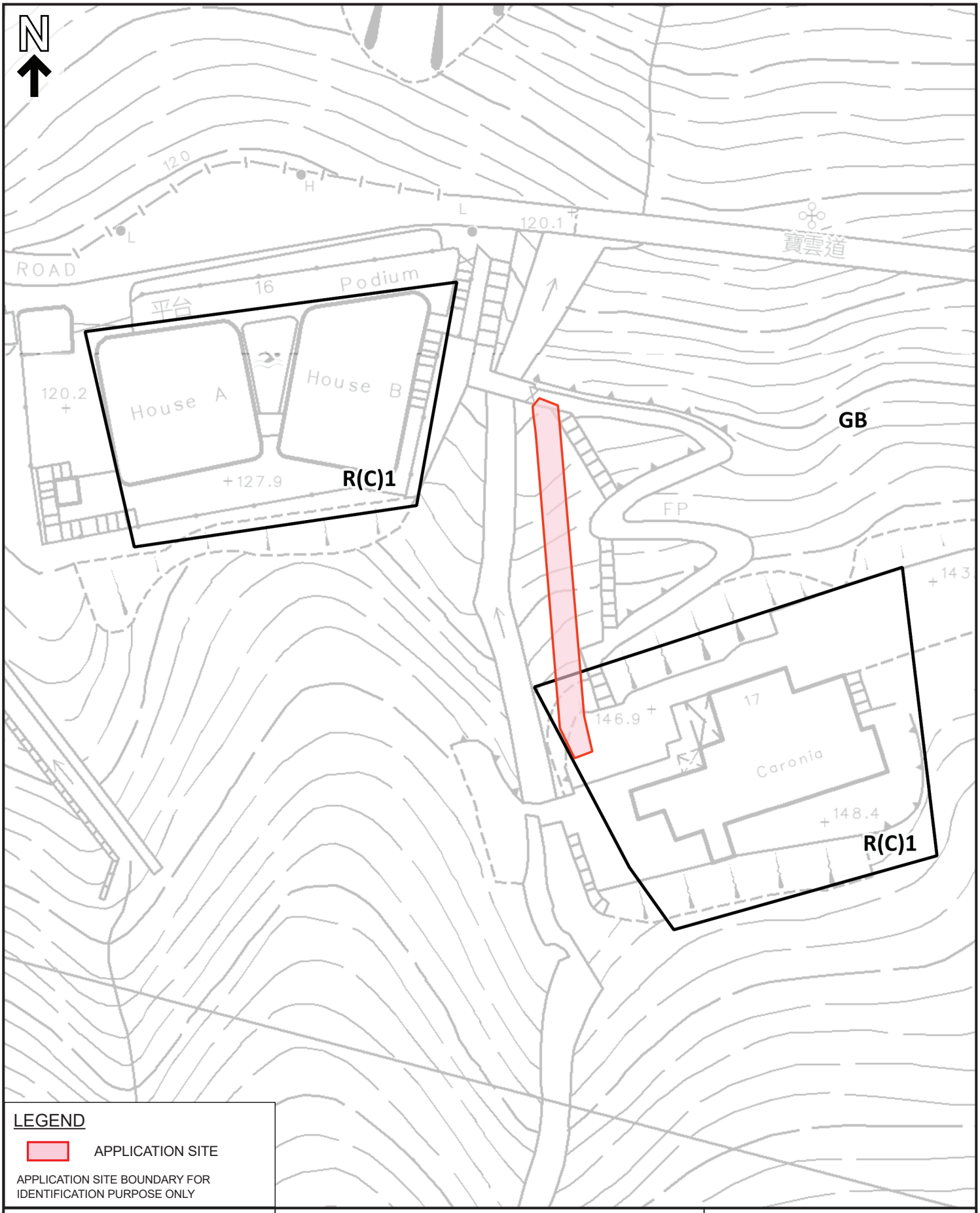
LOCATION PLAN

Proposed Access Road (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

SCALE: 1:2500

Extract plan based on the Approved Mid-Levels East Outline Zoning Plan No. S/H12/14 approved on 24.9.2024

DATE: 5 June 2025



LEGEND

APPLICATION SITE

APPLICATION SITE BOUNDARY FOR IDENTIFICATION PURPOSE ONLY

KTA PLANNING LIMITED
規劃顧問有限公司

SITE PLAN

Proposed Access Road (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

SCALE: 1:500

Extract plan based on the Survey Sheet No. 11-SW-14D

DATE: 5 June 2025

GREEN BELT

Column 1 Uses always permitted	Column 2 Uses that may be permitted with or without conditions on application to the Town Planning Board
Agricultural Use Barbecue Spot Government Use (Police Reporting Centre only) Nature Reserve Nature Trail On-Farm Domestic Structure Picnic Area Public Convenience Tent Camping Ground Wild Animals Protection Area	Animal Boarding Establishment Broadcasting, Television and/or Film Studio Cable Car Route and Terminal Building Field Study/Education/Visitor Centre Flat Government Refuse Collection Point Government Use (not elsewhere specified) Holiday Camp House Mass Transit Railway Vent Shaft and/or Other Structure above Ground Level other than Entrances Petrol Filling Station Place of Recreation, Sports or Culture Public Transport Terminus or Station Public Utility Installation Public Vehicle Park (excluding container vehicle) Radar, Telecommunications Electronic Microwave Repeater, Television and/or Radio Transmitter Installation Religious Institution Residential Institution School Service Reservoir Social Welfare Facility Utility Installation for Private Project Zoo

Planning Intention

The planning intention of this zone is primarily for the conservation of the existing natural environment amid the built-up areas/at the urban fringe, to safeguard it from encroachment by urban type development, and to provide additional outlets for passive recreational activities. There is a general presumption against development within this zone.

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S16 PLANNING APPLICATION
Approved Mid-Levels East OZP No. S/H12/14

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

Supporting Planning Statement

1. INTRODUCTION

1.1 Purpose

1.1.1 This Planning Application is prepared and submitted on behalf of Sydney Fung & Son Limited (the "Applicant") to seek approval from the Town Planning Board ("TPB") under Section 16 of the Town Planning Ordinance for a Proposed Access (Inclined Lift) for the existing residential development at No. 17 Bowen Road, Mid-Levels, Hong Kong (the "Site"). The Site falls primarily within an area zoned "Green Belt" ("GB") with a minor portion encroaching into the "Residential (Group C) 1" ("R(C)1") on the Approved Mid-Levels East Outline Zoning Plan (the "Approved OZP") No. S/H12/14. This Supporting Planning Statement is to provide the TPB and relevant Government departments with necessary information to facilitate consideration of this Planning Application.

1.2 Report Structure

1.2.1 Following this introductory section, the site and planning context will be briefly set out in Section 2. The description of Proposed Access is included in Section 3, followed by the planning merits and justifications for the Planning Application in Section 4. The Supporting Planning Statement will be concluded and summarises in Section 5.

2. SITE AND PLANNING CONTEXT

2.1 Site Location and Existing Condition

2.1.1 The Site is situated at a steep slope, extending uphill from the lower section of the existing right of way ("RoW") to the platform of Caronia, which is an existing single house development (**Figure 2.1** refers). The lower section of the Site is located at approx. +127.6mPD, while the upper section on the platform is at approx. +146.0mPD. The total site area is about 89.6m^2.

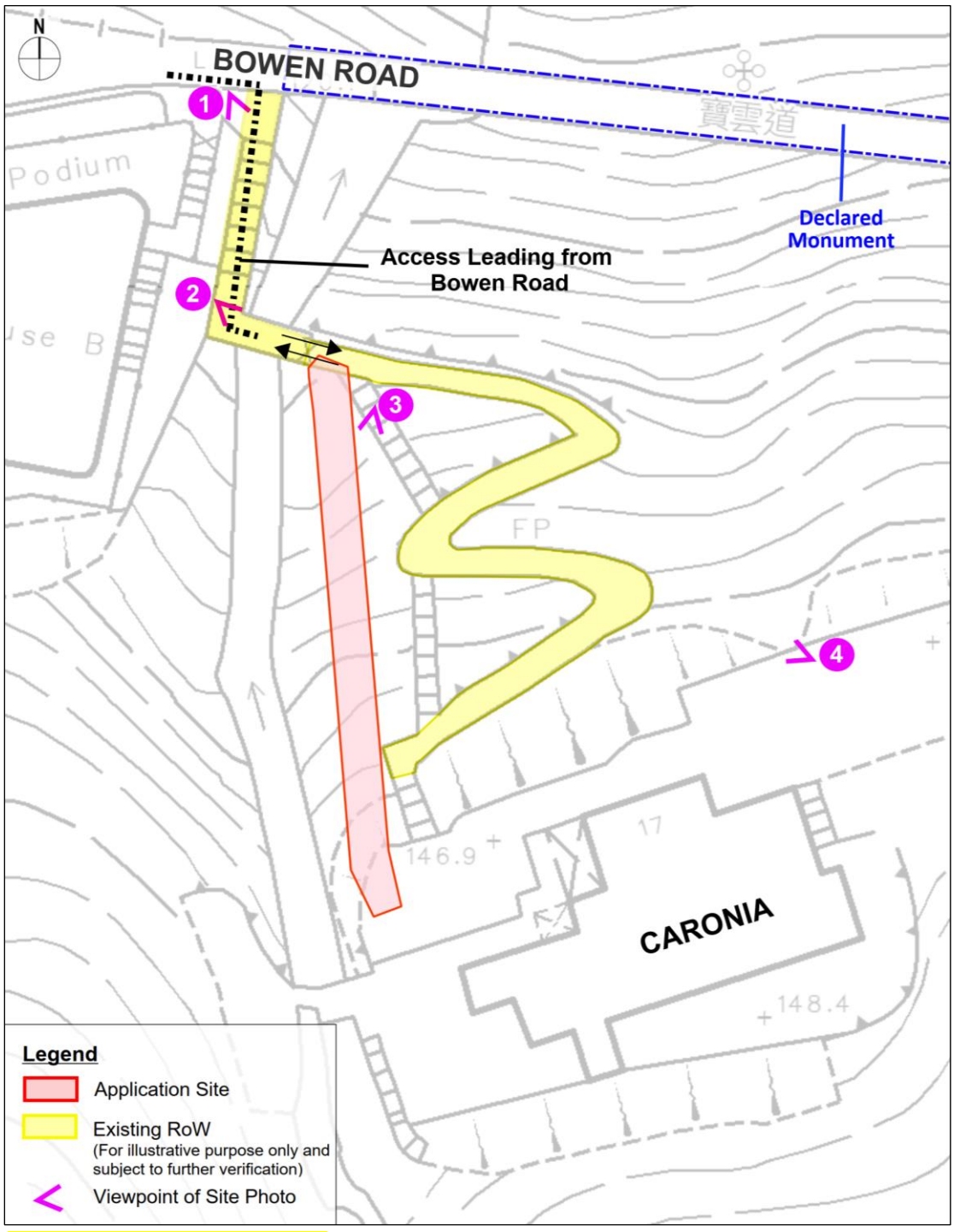


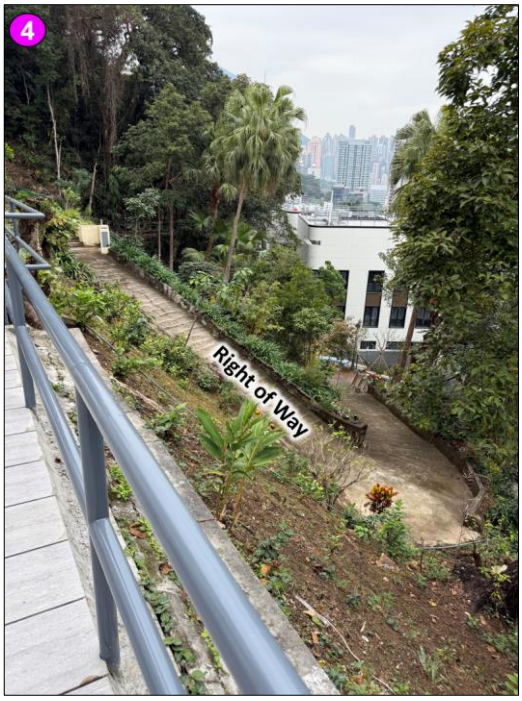
Figure 2.1: Site Location Plan

2.1.2 The Site is primarily a vegetated slope with portion occupied by a temporary manual conveying system (Photo 3 of **Figure 2.2** refers). The existing Row extends from approx. +127.5mPD to 143.4mPD, resulting in a gradient of about 1:1.8. The steep slope significantly restricts the accessibility to Caronia, creating a pedestrian-hostile environment that poses great difficulty to elderly and people with disabilities.

Viewing from Bowen Road

Viewing from the Gate

Viewing from Lower Portion of the Site



Viewing from Caronia

Figure 2.2: Site Photos

2.2 Land Status

2.2.1 About 77.8% of the Site (approx. 69.7m^2) falls on Government Land, whilst the rest of the Site (approx. 19.9m^2) is within Inland Lot (IL) 2460, which is wholly owned by the Applicant (**Figure 2.3** refers). The areas quoted are subject to detailed survey.

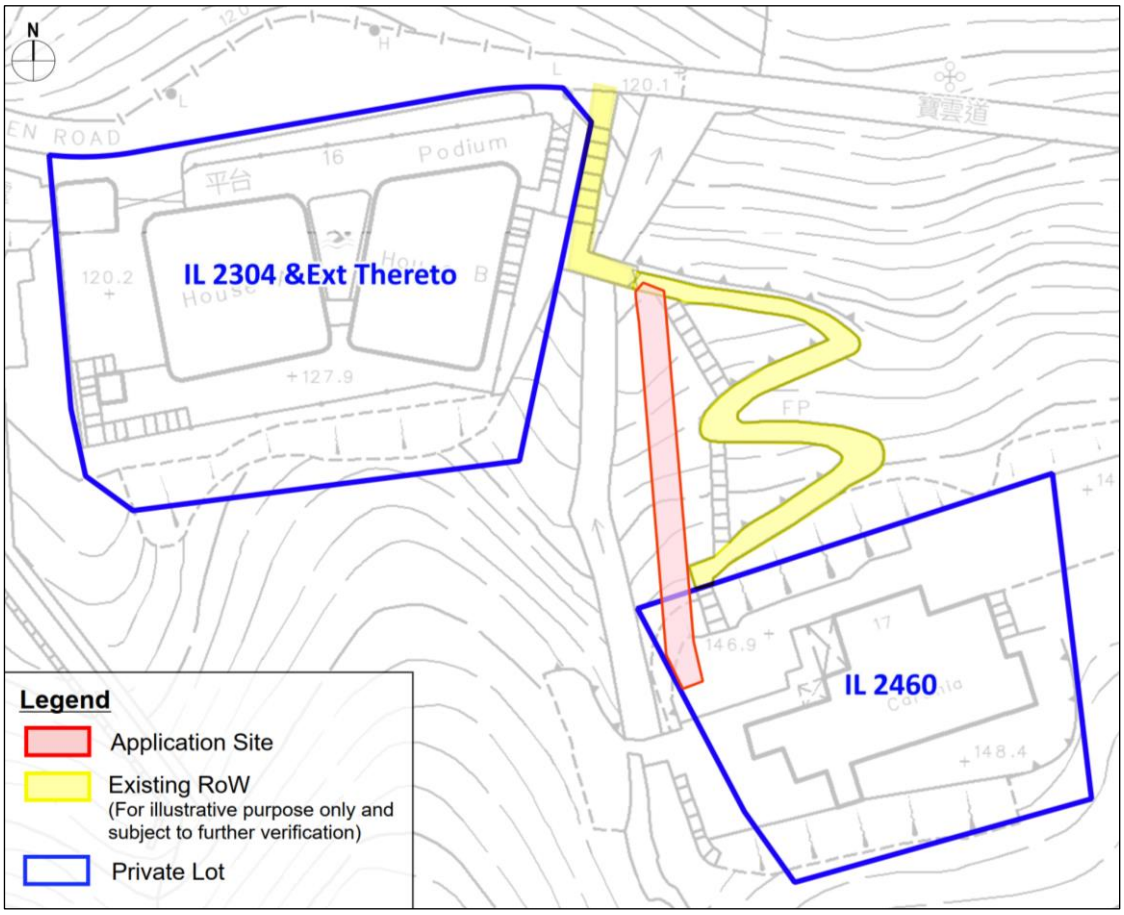


Figure 2.3: Lot Index Plan (For Illustrative Purpose Only and Subject to Detailed Survey)

2.3 Statutory Planning Context

2.3.1 The Site falls primarily within an area zoned "Green Belt" ("GB") with a minor portion encroaching into the "Residential (Group C) 1" ("R(C)1") on the Approved Mid-Levels East Outline Zoning Plan (the "Approved OZP") No. S/H12/14 (**Figure 2.4** refers). According to the Statutory Notes of the Approved OZP, the planning intention of "GB" zone is as follows,

"*The planning intention of this zone is primarily for the conservation of the existing natural environment amid the built-up areas/at the urban fringe, to safeguard it from encroachment by urban type development, and to provide additional outlets for passive recreational activities. There is a general presumption against development within this zone*".

2.3.2 The Proposed Access (Inclined Lift) is ancillary use to the 'House' use. Whilst 'House' is always permitted in "R(C)1" zone, it is a Column 2 Use in the "GB" zone and requires planning permission from the Town Planning Board ("TPB").

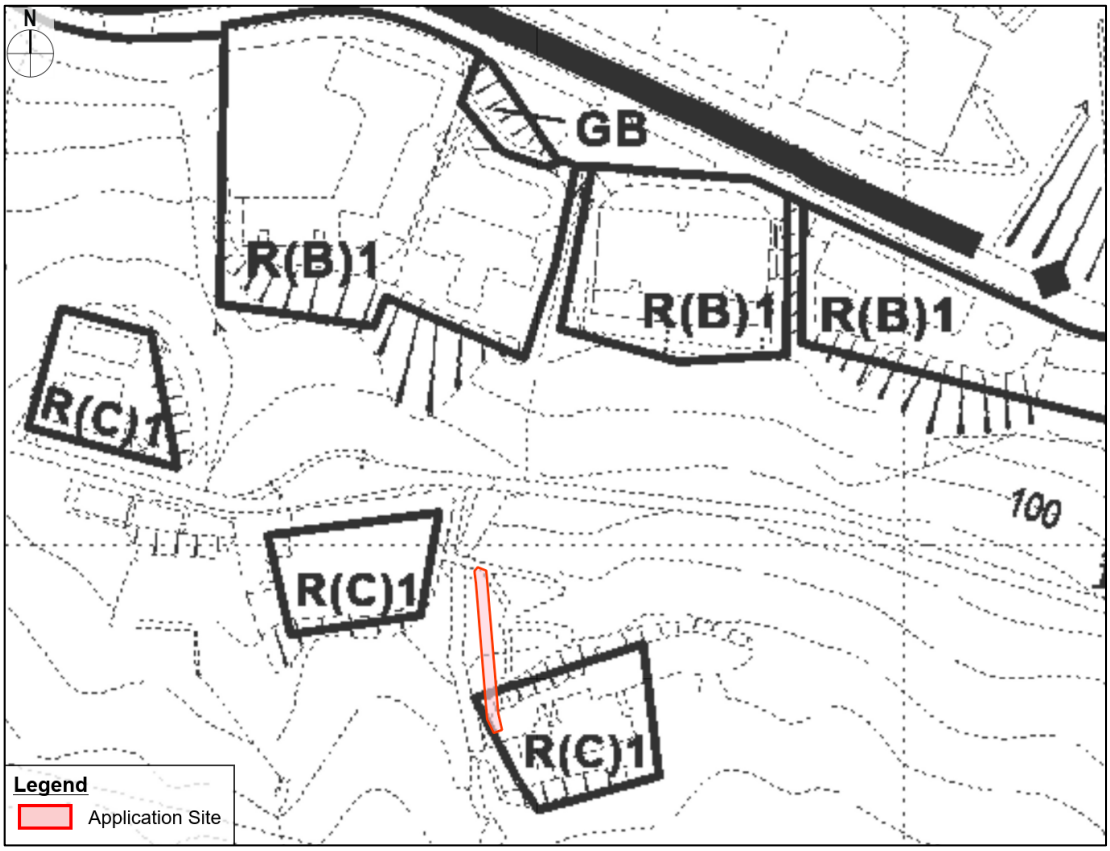


Figure 2.4: Zoning Context Plan (Extracted from the Approved OZP No. S/H12/14)

2.4 Surrounding Context

2.4.1 Bowen Road is a carriageway traversing the mid-levels, which also forms part of a fitness trail, namely Bowen Road Fitness Trail. Vehicles without valid permit are prohibited from entering the trail starting from the staircase to Caronia (Photo 1 of **Figure 2.2** refers). The Proposed Access (Inclined Lift) and the existing house are situated off Bowen Road and within a predominately residential area with various low to medium-rise residential developments. The surrounding area is largely occupied by vegetated slope and greenery area (**Figure 2.5** refers).

2.4.2 To the immediate northwest of the Site is two low-rise houses (i.e. 16 Bowen Road) falling within an area zoned "R(C)1" zone along Bowen Road. There are two "R(C)1" zones to its further northwest, which are also occupied by houses (i.e. 12 and 15 Bowen Road) and the Consulate of the Republic of Seychelles. To the north of the Site across Bowen Road downhill are three "Residential (Group B) 1" ("R(B)1") zones, comprising several medium-rise residential developments, namely Monticello, Man Yuen Garden, Ewan Court, Sakura Court and Kantian Rise, all served by Kennedy Road. The surrounding vegetated slope and greenery area are zoned "GB".

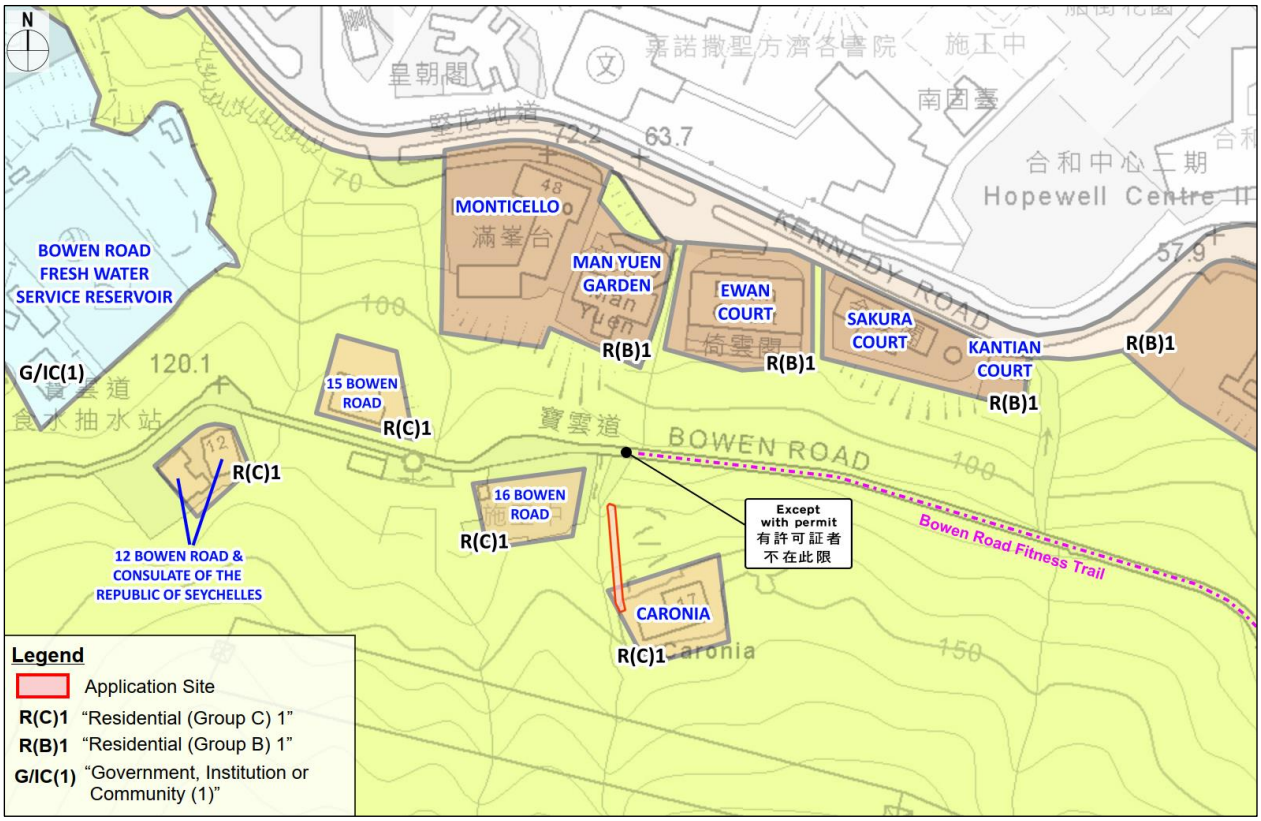


Figure 2.5: Surrounding Context Plan

2.5 Accessibility

2.5.1 The Site is accessible from the existing staircase and footpath ("RoW") leading from Bowen Road (**Figure 2.1** refers).

2.6 Planning History of the Site and Surrounding Area

2.6.1 There were a total of 4 previous planning applications in the vicinity seeking for permission for an access (pedestrian and/or vehicular) to serve the existing house (i.e. Caronia) between 1992 and 2015 viz. A/H12/3, A/H12/14, A/H12/18, and A/H12/28 (**Figure 2.6** refers). The Proposed Access (Inclined Lift) falls within one of the previous applications.

2.6.2 TPB rejected all these applications, mainly on the grounds of adverse visual and/or landscape impact, general presumptions against developments in "GB", not in line with "Town Planning Board Guideline No. 10 for Application for Development within Green Belt Zone" ("TPB PG-No.10"), adverse impact on public amenity and declared monument, and setting an undesirable precedent. Details of these planning applications and major rejection reasons have been summarised in **Table 2.1**.

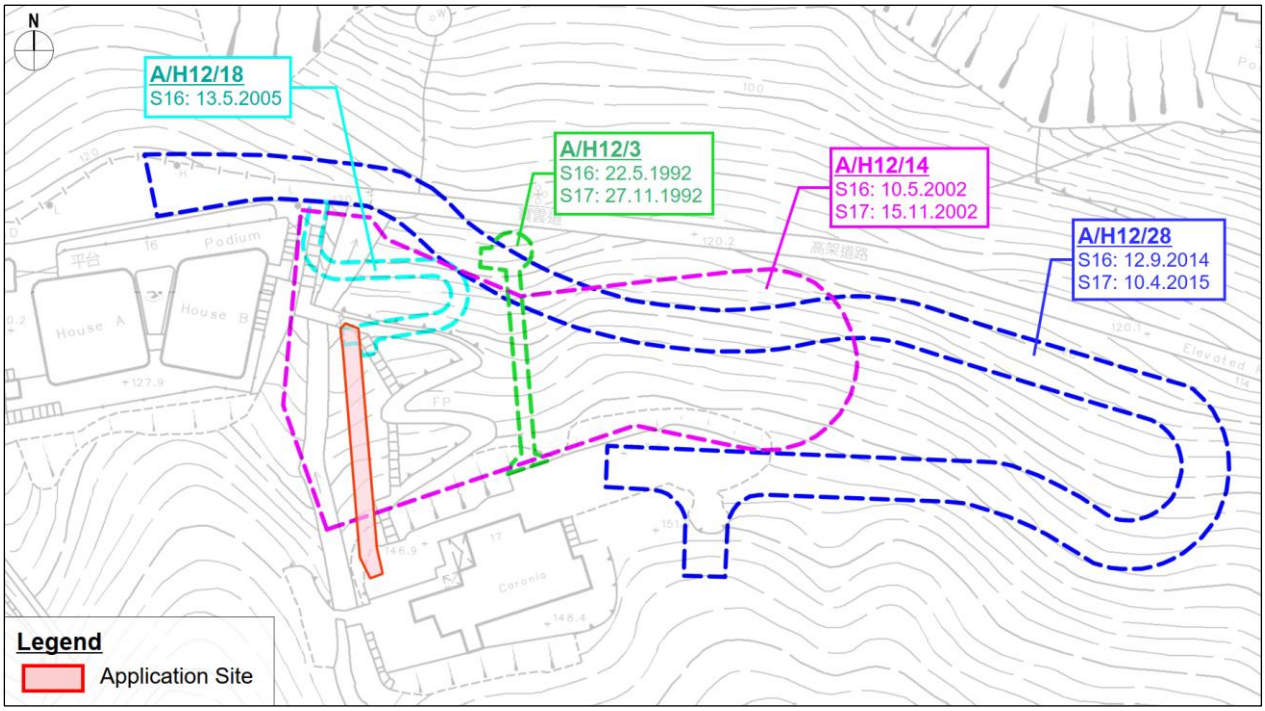


Figure 2.6: Planning History of the Site and Surrounding Area

Table 2.1: Details of Planning Applications of the Site and Surrounding Area

Application No.	Applied Use(s)	Site Area	Decision	Rejection Reason	Decision Date
A/H12/3	Inclined Passenger Elevator	73m^2	Rejected	(a), (b) & (c)	22.5.1992 (S16) 27.11.1992 (S17)
A/H12/14	Vehicular Access and Car Parking Spaces Ancillary to Residential Use	2,200m^2	Rejected	(a), (b) & (d)	10.5.2002 (S16) 15.11.2002 (S17)
A/H12/18	Access Road Ancillary to Residential Use	176m^2	Rejected	(a), (b) & (d)	13.05.2005 (S16)
A/H12/28	Proposed Vehicular Access for Residential Development	1,700m^2	Rejected	(b), (d), (e) & (f)	12.9.2014 (S16) 10.4.2015 (S17)

Note

(a) : Substantial adverse visual and/or landscape impact

(b) : Undesirable precedent

(c) : Public amenity affected

(d) : General presumption against development in “GB” and/or deviation from planning intention

(e) : Adverse impact on declared monument

(f) : Not in line with TPB PG-No.10

2.7 Similar Planning Applications

2.7.1 Apart from the planning applications discussed in **Section 2.6** above, there is no similar applications for access road use in “GB” zone within the same OZP. Nonetheless, TPB approved several similar planning applications within “GB” zone in other OZPs. Particulars of these planning applications have been provided in **Table 2.2**.

2.7.2 In gist, these applications were approved mainly on grounds of (i) in line with TPB PG-No. 10, (ii) no adverse impact (e.g. landscape and visual), and (iii) no objection from relevant departments.

Table 2.2: Similar Planning Applications Approved by the TPB

Application No.	Applied Use(s)	Zoning(s)	Site Area	Decision Date
A/H14/48	Proposed Access Road	“GB”	723m^2	14.1.2005
A/H14/61	Proposed Access Road with Guardhouse and Gate for Permitted House Development	“GB”	370m^2	24.7.2009
A/H14/66	Proposed Access Road for Residential Development	“GB” & ‘Road’	300m^2	18.3.2011
A/H14/69	Proposed Access Road for Residential Development	“GB”	72m^2	4.11.2011
A/TWW/114	Proposed Access Road for Residential Development	“GB” & ‘Road’	1,662m^2	16.11.2018

2.8 Town Planning Board Guideline No.10 for Application for Development within Green Belt Zone

2.8.1 The TPB PG-No.10 set out the main planning criteria for all developments to be erected within “GB” zone. While there is a general presumption against development with “GB” zone, any development/redevelopment should be compatible with the surrounding areas and should itself not be a source of pollutant.

2.8.2 The main planning criteria include:-

a. *There is a general presumption against development (other than redevelopment) in a "GB" zone. In general, the Board will only be prepared to approve applications for development in the context of requests to rezone to an appropriate use.*

b. *An application for new development in a "GB" zone will only be considered in exceptional circumstances and must be justified with very strong planning grounds. The scale and intensity of the proposed development including the plot ratio, site coverage and building height should be compatible with the character of surrounding areas. With the exception of New Territories Exempted Houses, a plot ratio up to 0.4 for residential development may be permitted.*

c. *Applications for New Territories Exempted Houses with satisfactory sewage disposal Town Planning Board July 1991 facilities and access arrangements may be approved if the application sites are in close proximity to existing villages and in keeping with the surrounding uses, and where the development is to meet the demand from indigenous villagers.*

d. *Redevelopment of existing residential development will generally be permitted up to the intensity of the existing development.*

e. *Applications for G/IC uses and public utility installations must demonstrate that the proposed development is essential and that no alternative sites are available. The plot ratio of the development site may exceed 0.4 so as to minimize the land to be allocated for G/IC uses.*

f. *Passive recreational uses which are compatible with the character of surrounding areas may be given sympathetic consideration.*

g. *The design and layout of any proposed development should be compatible with the surrounding area. The development should not involve extensive clearance of existing natural vegetation, affect the*

existing natural landscape, or cause any adverse visual impact on the surrounding environment.

h. *The vehicular access road and parking provision proposed should be appropriate to the scale of the development and comply with relevant standards. Access and parking should not adversely affect existing trees or other natural landscape features. Tree preservation and landscaping proposals should be provided.*

i. *The proposed development should not overstrain the capacity of existing and planned infrastructure such as sewerage, roads and water supply. It should not adversely affect drainage or aggravate flooding in the area.*

j. *The proposed development must comply with the development controls and restrictions of areas designated as water gathering grounds.*

k. *The proposed development should not overstrain the overall provision of G/IC facilities in the general area.*

l. *The proposed development should not be susceptible to adverse environmental effects from pollution sources nearby such as traffic noise, unless adequate mitigating measures are provided, and it should not itself be the source of pollution.*

m. *Any proposed development on a slope or hillside should not adversely affect slope stability.*

3. PROPOSED ACCESS ROAD (INCLINED LIFT)

3.1 The Proposal

3.1.1 Schematic and sectional drawings of the Proposed Access (Inclined Lift) are presented in **Appendix 1** of this Supporting Planning Statement. The Proposed Access, involving the installation of an inclined lift (about of 32m in length) and the associated works area, occupies a site area of about 89.6m^2. This is to facilitate the re-alignment of existing RoW, which will be partially replaced by the proposed inclined lift and existing staircase (subject to discussion with relevant B/Ds), and provide a facilitated access to enhance accessibility for the residents of Caronia.

3.1.2 The Proposed Access (Inclined Lift) is strategically positioned adjacent to the existing gate at the lower section of the RoW, at approx. +127.6mPD, extending uphill to the platform of the Caronia at approx. +146.0mPD (**Figures 3.1** & **3.2** refers). To minimise potential intrusion into the surrounding environment, the proposed inclined lift features a compact design with a dimension of approx. 2.2m in height and 1.5m in width, which will facilitate seamless integration with the existing terrain and built features, such as the adjacent staircase and footpath.

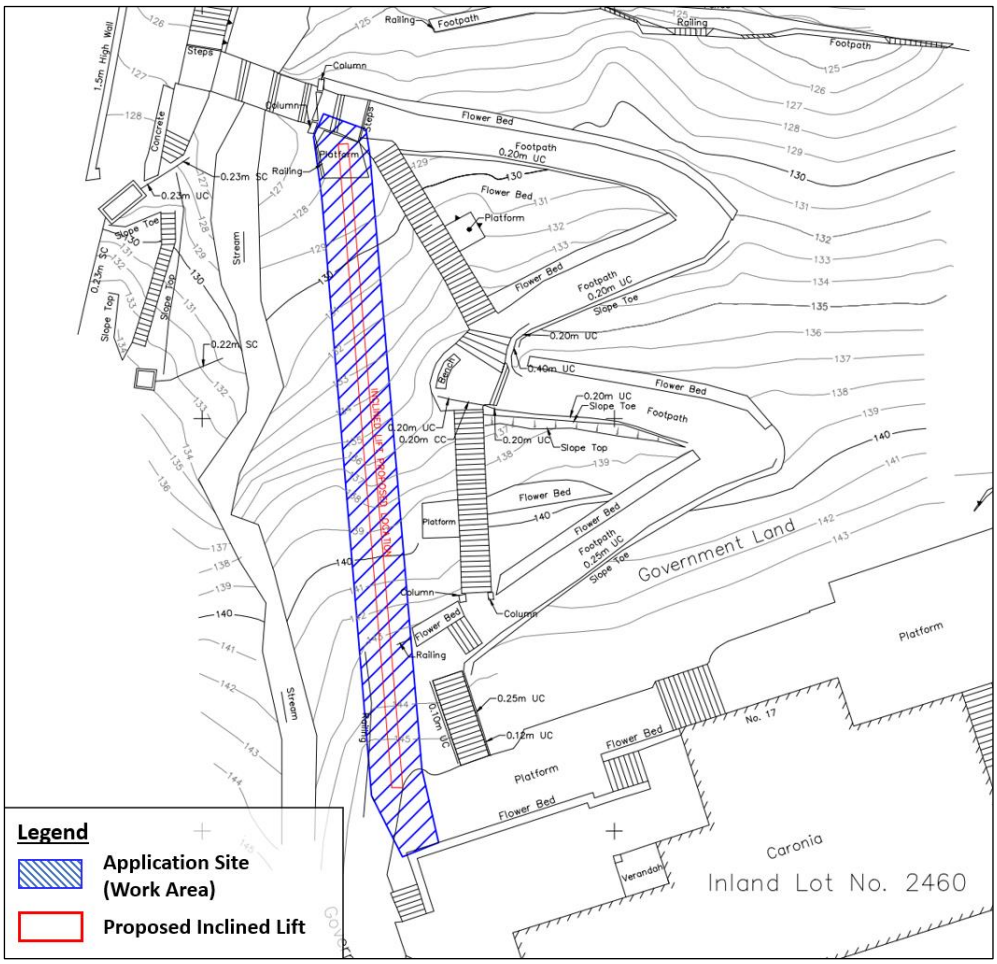


Figure 3.1: The Proposed Inclined Lift

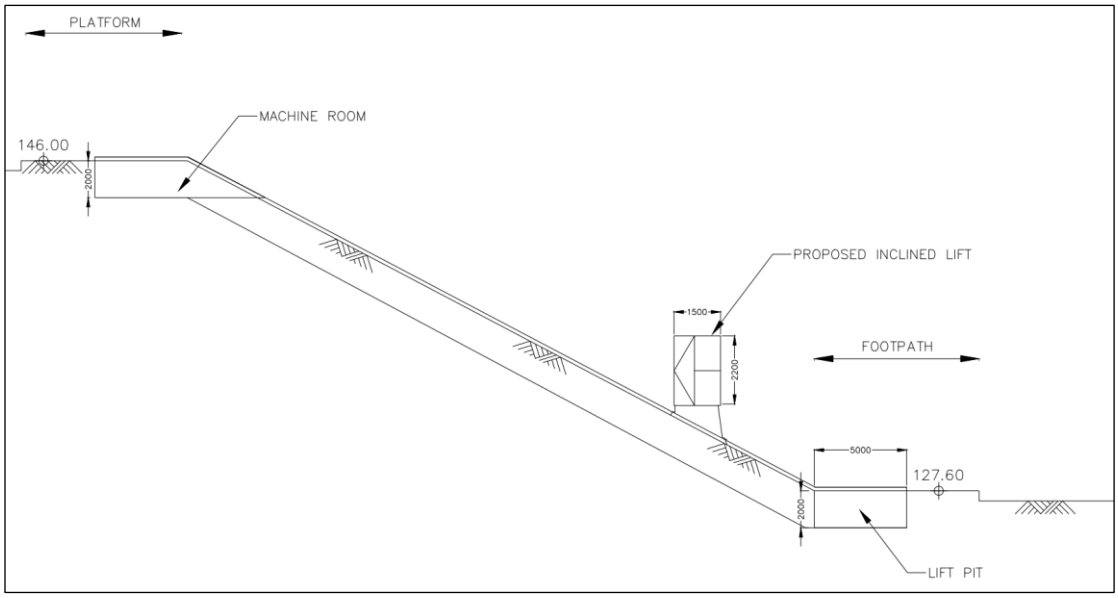


Figure 3.2: Section of The Proposed Inclined Lift

3.2 Site Selection and Alignment Considerations

3.2.1 Drawing on the experience of the previously rejected planning applications (**Section 2.6** refers), the location and alignment of the Proposed Access Road have been carefully studied and selected, taking into account the rejection grounds and considerations by TPB Members.

3.2.2 The site selection has addressed TPB's concerns on the potential impact to the public amenity and declared monument by strategically positioning the proposed inclined lift away from the public walking trail along Bowen Road and pushing it to the farthest corner possible to avoid direct interface with the declared monument (i.e. 21-Arch Section of the Bowen Aqueduct). Further, the site area has been significantly reduced to a minimal size and scale (about 89.6m^2) to serve only essential access function without compromising the integrity of the "GB" zone.

3.2.3 Not least, the alignment of the proposed inclined lift has also been carefully planned to avoid extensive clearance of existing vegetation or landscape. Site survey confirmed that only 5 nos. of tree (2 nos. within the Site and 3 nos. outside the Site) of common species will be affected and that they will be compensated in the immediate surrounding (please refer to **Section 3.4** for further details).

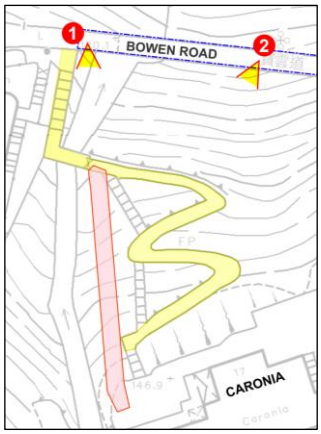
3.3 Visual Considerations

3.3.1 To minimise visual impact and ensure compatibility with the surrounding environment, various sensitive design features will be incorporated in the proposed inclined lift. For instance, non-reflective materials and natural colour schemes will be adopted for seamless integration with the surrounding environment and existing terrain. In addition, the compact size

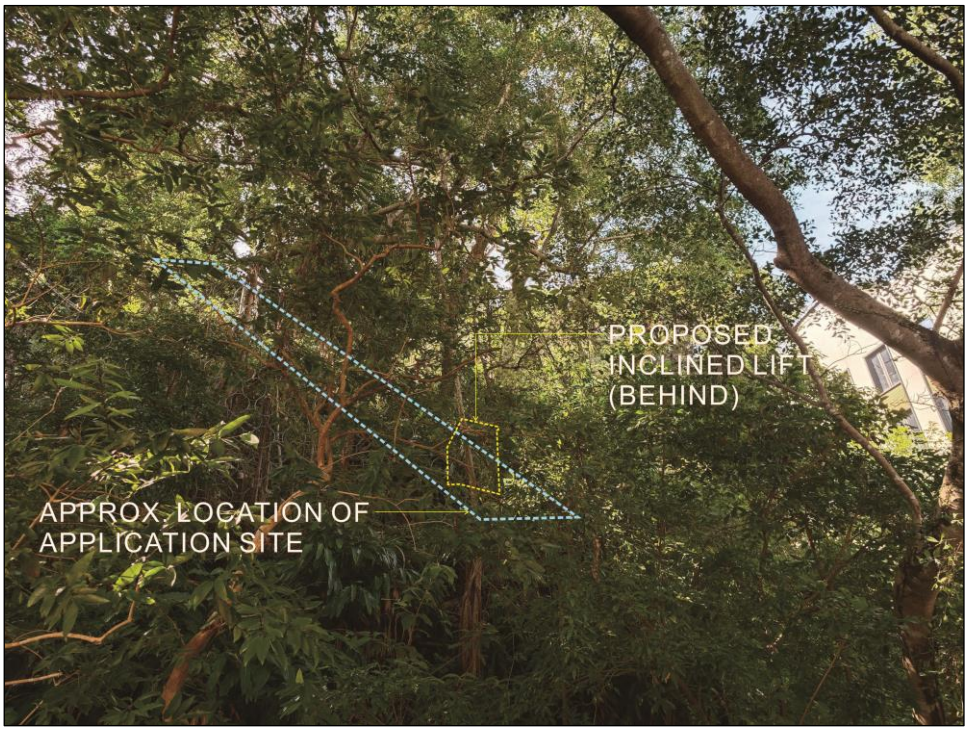
of the proposed inclined lift would further reduce potential intrusion, ensuring negligible physical and visual impact onto the surrounding area (**Figure 3.3** refers).

Figure 3.3: Reference Sensitive Design Features

3.3.2 As demonstrated in **Figure 3.4**, the proposed inclined lift will be largely or even completely shielded off by the existing vegetation when viewing from different locations along Bowen Road. When the proposed incline lift arrives at the footpath level near Bowen Road, the top portion of the glassy compartment would be visible; on the contrary, when it reaches the platform level, view towards the proposed inclined lift would be completely blocked by existing vegetation. Since the proposed inclined lift would blend in well with the surroundings and appear visually compatible with the low-rise and low-density residential characteristics, only negligible visual impact would be envisaged.



Viewpoint 1



Viewpoint 2

Figure 3.4: Photomontages

3.4 Tree Preservation and Landscape Proposal

3.4.1 The Applicant has carried out a Tree Survey (**Appendix 2** refers) that covers both the Application Site and as well as the area 3m away from both sides of the boundary. As revealed in the Tree Survey, there are a total of 11 nos. of existing trees, including 2 nos. within the Site and 9 nos. outside the Site. All existing trees are common species that can be found in Hong Kong. No Old and Valuable Trees (OVT), protected species, nor Tree of Particular Interest (TPI) has been identified. Out of the 11 nos. existing trees, 6 nos. are proposed to be retained, whilst 5 nos. (2 nos. within the Site and 3 nos. outside the Site) would be felled. In terms compensation, a total of 8 nos. of standard trees would be planted in the immediate surroundings of the Site along the slope, achieving a compensatory ratio of 1:1.6.

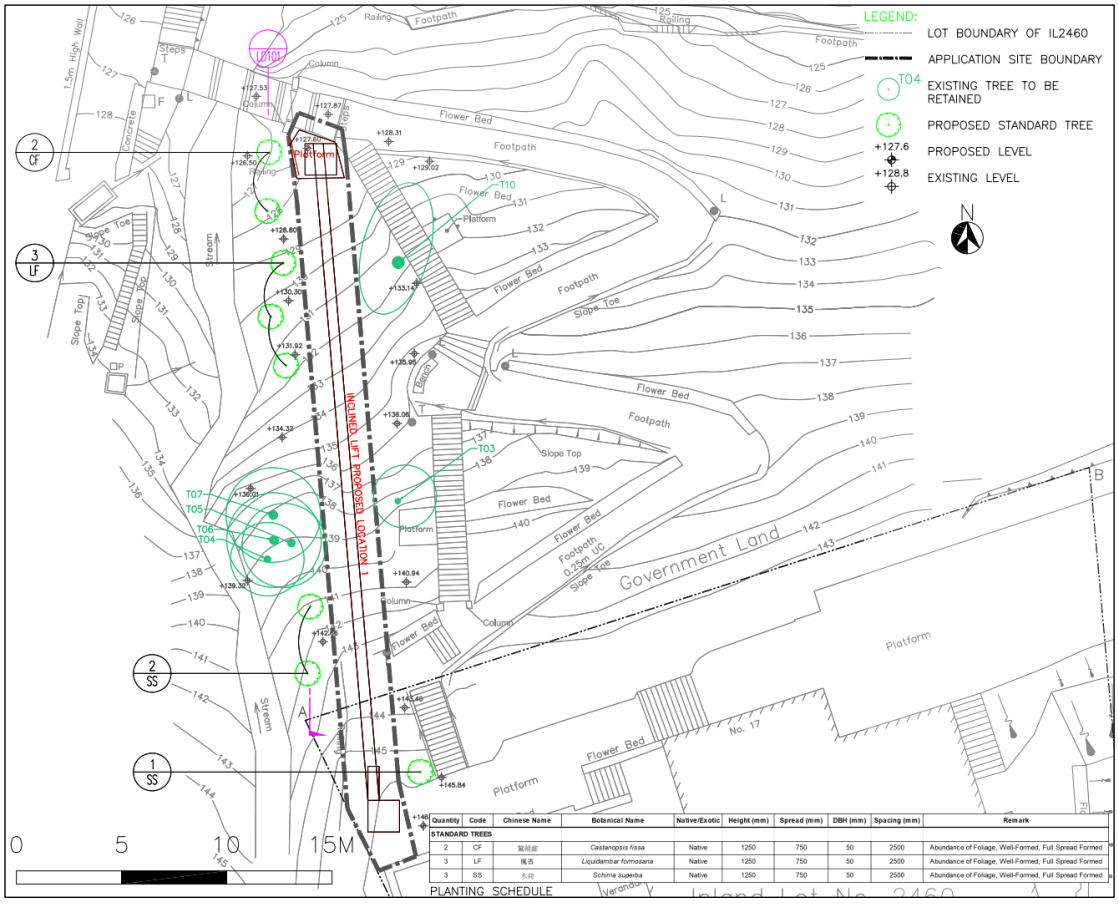


Figure 3.5: Landscape Proposal

3.5 Place-making Proposal

3.5.1 To enhance planning merit of the proposal, opportunity has been taken to review the Site and its surroundings. Arising from the review, the installation of a curated signboard is proposed as planning merit, which will harmoniously integrate with the existing traffic signage. As shown in the indicative proposal in **Figure 3.6**, the panel would feature a directional marker guiding the visitors and tourists toward the declared monument, with curated background information. Through the proposed signboard, the fitness trail would be transformed into an enriched historical pathway, offering the public a heightened opportunity to pause, connect, and appreciate the legacy of this historic landmark.

Figure 3.6: Indicative Curated Signboard (for reference only; dimensions, content and other details shall be subject to approval by AMO)

4. PLANNING JUSTIFICATIONS

4.1 The Proposed Access (Inclined Lift) is “Small in Size and Minimal in Scale”

4.1.1 The Proposed Access, involving the installation of an inclined lift and the associated works area, occupies a site area of about 89.6m^2 only, which is exceptionally small in size and minimal in scale. Amongst which, only 69.7m^2 falls within the "GB” zone, representing a negligible 5.1% of the "GB” area between Caronia and Bowen Road (**Figure 4.1** refers). The small site size ensures that the Proposed Access Road will only serve essential access function without compromising the integrity of the “GB” zone.

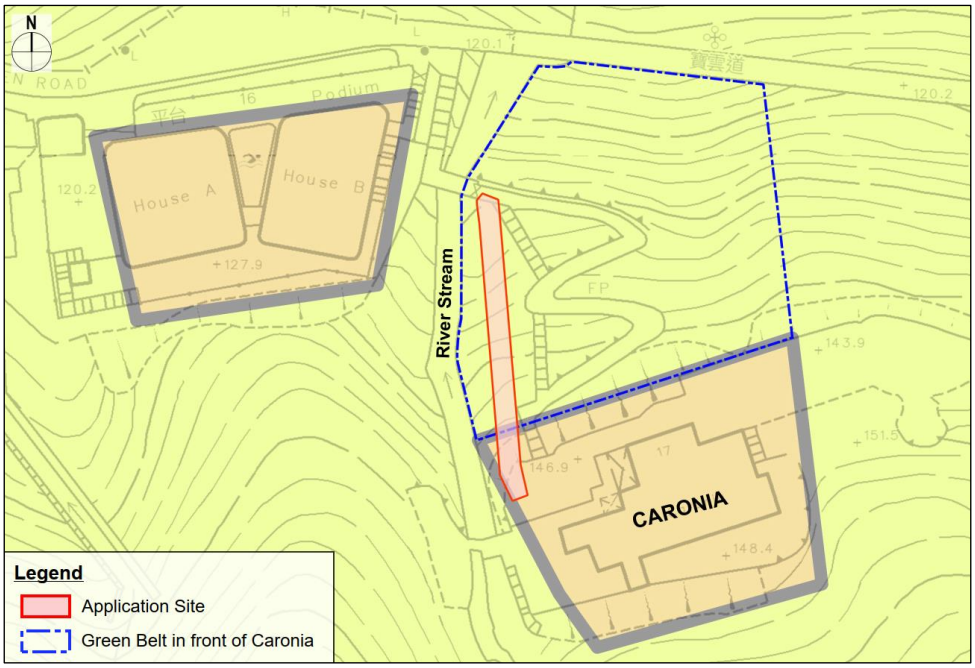


Figure 4.1: Affected “GB” Area

4.1.2 In addition to its small size, the proposed inclined lift also features a compact design with a dimension of about 2.2m in height and about 1.5m in width. The minimal scale of the proposed inclined lift represent a low-profile design, which would ensure negligible visual and physical impact, as well as seamless integration with the surrounding environment.

4.2 Compatible with Surrounding Environment

4.2.1 Although the Site falls primarily within a “GB” zone, it is actually a sparsely vegetated cut-slope with low landscape and amenity value. No least, the surrounding environment of the Site is characterised by existing hard-paved infrastructures (i.e. staircase and footpath), and low-rise residential developments such as Caronia and 16 Bowen Road. The Proposed Access Road is compatible with the surrounding environment in terms of land use and character.

4.2.2 Nonetheless, to further enhance compatibility with the existing built environment, various sensitive design features, such as non-reflective surface and natural colour scheme, will be adopted for the proposed inclined lift to harmonise with the surrounding environment.

4.3 No Adverse Impact on Public Amenity and Declared Monument

4.3.1 While the Site is located on Government Land, it is actually gated and not publicly accessible. In addition, to avoid direct impact on the public amenity and interface with the declared monument (i.e. 21-Arch Section of the Bowen Aqueduct), the proposed inclined lift is strategically positioned away from the public walking trail along Bowen Road (**Figure 2.1** refers). Through careful site selection and alignment, the Proposed Access Road will not adversely affect the amenity and historical value of the area, thereby preserving public amenity and the integrity of the declared monument.

4.4 In line with TPB PG-No. 10

4.4.1 The Proposed Access Road, involving only installation of a inclined lift, is small in size and minimal in scale. It is fully in line with the planning criteria set out in TPB PG-No.10 and the justifications are tabulated as follows:

<table>
<tr><th colspan="2">Main Planning Criteria</th><th>Justification</th></tr>
<tr><td>(a)</td><td>There is a general presumption against development (other than redevelopment) in a "GB" zone. In general the Board will only be prepared to approve applications for development in the context of requests to rezone to an appropriate use.</td><td rowspan="2">With a site area of about 89.6sq.m, the Proposed Access Road is small in size and minimal in scale. Not least, only a very small part of the “GB” zone (about 69.7sq.m), amounting to about 5.1% of “GB” area between Caronia and Bowen Road, will be affected by the proposal. Given the small size of the Proposed Access Road, the integrity of the “GB” zone will not be compromised.

In addition, the proposal only involves installation of a inclined lift, which serves an essential function of providing barrier-free access. With a dimension of about 2.2m in height and 1.5m in width, the proposed inclined lift is minimal in scale and intensity, and compatible with the character of surrounding areas. It also represents a low-profile design that would ensure negligible visual and physical impact.</td></tr>
<tr><td>(b)</td><td>An application for new development in a "GB" zone will only be considered in exceptional circumstances and must be justified with very strong planning grounds. The scale and intensity of the proposed development including the plot ratio, site coverage and building height should be compatible with the character of surrounding areas. With the exception of New Territories Exempted Houses, a plot ratio up to 0.4 for residential development may be permitted.</td></tr>
</table>

	Main Planning Criteria	Justification
(g)	The design and layout of any proposed development should be compatible with the surrounding area. The development should not involve extensive clearance of existing natural vegetation, affect the existing natural landscape, or cause any adverse visual impact on the surrounding environment.	To avoid extensive clearance of existing natural vegetation and adverse visual impact, site selection and alignment of the Proposed Access Road were carefully studied. First off, it is strategically positioned away from the public walking trail along Bowen Road and the declared monument. Secondly, the alignment of the inclined lift has successfully minimise vegetation clearance, under which only 5 nos. of tree (2 nos. within the Site and 3 nos. outside the Site) of common species will be affected. The affected trees will be compensated in the immediate surrounding (**Figure 3.4** refers). Not least, sensitive design features, such as non-reflective surface and natural colour scheme, will be adopted, which will not only minimise potential visual intrusion, but also ensure seamless integration with the surrounding environment. As demonstrated in **Figure 3.3**, the proposed inclined lift will be largely or completely shielded off when viewing from Bowen Road. Hence, the Proposed Access Road is envisaged to result in negligible visual impact.

4.5 Improvement to Accessibility for the Existing Residents

4.5.1 Situated on a steep slope with gradient of about 1:1.8, the Caronia has no direct vehicular access nor served by any barrier-free facilities. At present, access to Caronia is restricted to the steep staircase and footpath leading from Bowen Road. In this regard, the accessibility of Caronia is severely hindered by the steep terrain, which created a pedestrian-hostile environment, posing significant challenges to elderly, not to mention safety issue during wet and humid weather.

4.5.2 Provision of an inclined lift next to the existing RoW would effectively address the accessibility issue and transform the residential site into a more pedestrian-friendly environment, thereby enhancing the overall liveability, inclusivity and safety for existing residents of the Caronia, while also without compromising the integrity of the "GB" zone.

4.6 Adjustments Made To Address TPB's Previous Concerns

4.6.1 In response to the TPB's considerations and rejection grounds from the previous planning applications (**Section 2.6** refers), the current proposal has incorporated various adjustments to address TPB's concerns and comply with TPB PG-No.10. The Applicant's proactive approach demonstrates the commitment to balance accessibility needs as well as the conservation objectives of the "GB" zone:

Optimised Site Selection and Alignment Design

4.6.2 To minimise potential impacts on public amenities and the declared monument, the proposed inclined lift has been strategically positioned away from Bowen Road (i.e. Bowen Road Fitness Trail & declared monument) at the expense of the optimum convenience of the residents. Future users will have to take a few steps off Bowen Road before reaching the proposed inclined lift. Unlike the previous applications, the current proposal has avoided direct interface with the declared monument by locating the inclined lift to the farthest feasible corner. Not least, there will not be any direct sightline to the inclined lift from the Fitness Trail. Coupled with the negligible visual impact, the potential impact on public amenities will be minimised to a negligible level.

Substantial Reduction in Site Area

4.6.3 The site area of the current proposal has been significantly reduced to about 89.6m^2, representing a substantial reduction compared to the average of 997.5m² for the previous applications. The small site area represents a minimal footprint that serves only essential accessibility function while limiting the encroachment onto the "GB" zone. By adopting the "small in size, minimal in scale" approach, the current proposal will result in a much lower visual and landscape impact than those of the previous applications', in that only negligible visual and landscape impact would be envisaged.

4.6.4 In addition, to further minimise the site area, the Applicant has taken deliberate step of forgoing the direct access to Bowen Road, which would have required a larger land take, causing greater disruption to the "GB" zone and public amenities. This compromise made, combined with the site selection, alignment and sensitive design measures, reflects the Applicant's commitment to balance accessibility needs with the conservation objectives of the "GB" zone.

4.7 Appropriate Responses to TPB's Previous Rejection Grounds

4.7.1 While the rejection grounds and considerations of the TPB on previous applications have been set out in **Section 2.6**, the following section will focus on how the current proposal responds to these concerns:

Rejection Grounds/ Considerations	Responses
(a) Substantial adverse visual and/or landscape impact	First off, the current proposal adopts a "small in size, minimal in scale" approach that fundamentally distinguishes itself from the previous applications, with a view to minimising any potential visual and landscape impact. Compared to previous applications, the Application Site has been considerably reduced to approx. 89.6m², of which only about 69.7m² fall within the "GB", representing a negligible 5.1% of the "GB" area between Caronia and Bowen Road (**Figure 4.1** refers). The Tree Survey (**Appendix 2**) confirms that only 5 out of 11 nos. of existing trees of common species will be affected, without involving any OVT nor TPI. Further, 8 nos. of compensatory planting are proposed in the immediate surroundings, thereby achieving a compensation ratio of 1:1.6. Thus, the landscape environment of the Area will be enhanced by the current proposal. In terms of visual impact, the photomontages (**Figure 3.3**) demonstrates that view towards the proposed inclined lift will be largely or completely screened off by the existing vegetation when viewing from different locations along Bowen Road. In other words, and the proposed incline lift is hardly noticeable from the public walking trail. In addition to carefully thought-out site selection and alignment, the compact design, combined with various sensitive design features (e.g. non-reflective surfaces and natural colour scheme), ensures seamless integration and visual compatibility with the surrounding and built-environment. Consequently, the proposal would result in only negligible visual and landscape impacts and would not compromise the integrity of the "GB" zone.
(b) Undesirable precedent	As summarised in **Section 2.7**, several similar applications for access road use serving permitted residential developments within "GB" zone were previously approved by the TPB.

	These approved applications shares very similar nature and context with the current application (e.g. no adverse impacts, small in size/scale, no objection from relevant government departments, re-alignment of existing RoW etc.). Considering the similar planning circumstances and context, approval of the current application WILL NOT set any undesirable precedent, and will be consistent with the TPB's previous decisions. Further, it must be stressed that the Applicant has made his/her best endeavour to address previous concerns of TPB. As illustrated in **Figure 2.6**, the current proposal is considerably smaller in scale than the rejected applications, and has been specifically designed to minimise encroachment onto the "GB" zone through refined site selection and re-alignment, while addressing a genuine accessibility need for an existing residential development on a steep site. In this regard, the scale and extent of the proposed inclined lift have been limited to the absolute minimum required to serve the essential access function only, and that any potential impact will be minimised to a negligible level. In view of the above, it is considered that an reasonable balance between accessibility & convenience and public interest has been struck, whilst addressing TPB's previous concerns. With the continuous efforts and compromises made by the Applicant, the current proposal is clearly distinguishable from the earlier rejected schemes and warrants favourable considerations from the TPB.
(c) Public amenity affected, and; (e) Adverse impact on declared monument	To avoid any potential intrusion / adverse impact on the on public amenity and declared monument, the proposed inclined lift has been strategically positioned away from the Bowen Road and pushed to the farthest corner possible, with a significantly reduced size and carefully designed alignment. This eliminates any direct interface with the declared monument and ensures no direct sightline from the public trail. With the negligible visual impact confirmed by the photomontages and the absence of any physical interface / intrusion into the public realm or the monument, relevant concerns on public amenity and declared monument have been adequately addressed. Also, it should be

	remarked that the heritage authority has no adverse comment on the current proposal.
(d) General presumption against development in "GB" and/or deviation from planning intention, and; (f) Not in line with TPB PG-No.10	As detailed in **Section 4.4**, the proposal fully satisfies the relevant planning criteria under TPB PG-No.10. To recap, the proposed inclined lift is small in size, minimal in scale, and features a low-profile design, which (i) is compatible with the character of the surrounding low-rise residential developments and existing hard-paved infrastructure (e.g. staircase and footpath), (ii) will not involve extensive clearance of existing natural vegetation, (iii) involves only a small portion of the "GB" zone (i.e. a negligible 5.1%), and (iv) would only result in negligible visual or landscape impact. We would like to reiterate that the current proposal is to facilitate the re-alignment of existing RoW (comprising the proposed inclined lift and existing staircase, subject to discussion with relevant B/Ds), and that the Proposed Inclined Lift is an essential ancillary facility to provide facilitated access to the Caronia, which is an existing permitted use. This facilitated access is particularly important for elderly or people with disability on a steep site, and does not represent any conventional urban-type development nor deviate from the planning intention of the "GB" zone in any manner. Not least, the integrity of the "GB" zone would be preserved, as only a negligible portion (5.1%) of the relevant "GB" area would be affected. Therefore, the current proposal WILL NOT compromise integrity of the "GB" zone, is in line with TPB PG-No. 10, and warrants favourable consideration from the TPB.

4.8 Approval of the Planning Application is Consistent with TPB's Previous Decisions On Similar Applications

4.8.1 As detailed in **Section 2.7**, the TPB has previously approved several similar planning applications for access road use within "GB" zone. The site area of these applications range from 72m^2 to 1,662m^2. The Proposed Access Road is significantly smaller in size and scale than these approved schemes.

4.8.2 As such, approval of the current Planning Application would be consistent with the TPB's previous decisions on similar small-scale developments within "GB" zone. Given the small size, minimal scale, and negligible physical, visual and environmental impact of the Proposed Access Road, the proposal will not set any undesirable precedent.

4.9 Technically Feasible with No Insurmountable Impact

Visual

4.9.1 Based on the photomontages provided in **Figure 3.3**, the proposed inclined lift will only result in negligible visual impact as it will be largely or completely shielded off by existing vegetation when viewing from different locations along Bowen Road.

Tree and Landscape (Appendix 2 refers)

4.9.2 A total of 11 nos. of trees, including 2 nos. within the Site and 9 nos. within its 3m buffer, were identified. No OVT, protected species, nor TPI was surveyed. Amongst the 11 nos. of existing trees, 6 nos. are proposed to be retained, while the remaining 5 nos. (2 nos. within the Site and 3 nos. its 3m buffer), which will be inevitably affected by the Proposed Development, are recommended to be felled. A compensation ratio of 1:1.6 (i.e. 8 nos. of trees) will be achieved. The compensatory trees will be reprovisioned to the immediate surroundings of the Site along the slope.

Geotechnical (Appendix 3 refers)

Based on the findings of the Geotechnical Planning Review Report, the Proposed Development is considered relatively small in scale and geotechnically feasible to be implemented at the Site. While no natural terrain hazard study is required, geotechnical assessment report, detailed design and works proposal of associated works shall be submitted for approval in subsequent stages.

5. CONCLUSION AND SUMMARY

5.1.1 In light of the above, it is believed that the Proposed Access (Inclined Lift) should be favourably considered by the TPB from the planning and technical point of view.

5.1.2 The Planning Department and Members of the TPB are respectfully requested to give favourable consideration to support the Proposed Access (Inclined Lift) based on the following main reasons:

- The Proposed Access (Inclined Lift) is small in size and minimal in scale;
- The Proposed Access (Inclined Lift) is compatible with the surrounding environment;
- The Proposal will not adversely affect public amenity and declared monument;
- There will be no adverse visual impact;
- There will be no adverse landscape impact;
- The Proposal is in line with Town Planning Board Guidelines for Application for Development within Green Belt Zone;
- The Proposed Access (Inclined Lift) will enhance accessibility;
- The Proposal has incorporated adjustments to address TPB’s previous concerns;
- Approval of the Planning Application would be consistent with TPB’s previous decisions on similar applications; and

Annex B

Replacement Pages of Geotechnical Planning Review Report

2 Site Information

2.1 General

The Site has a site area of about 89.6 m^2 approximately on plan. It is on a sloping ground with site ground level 146 mPD at Lot IL 2460 to 127.6 mPD at the existing stairway at North. There is an existing natural stream on the West side and 1 m wide stairway on the East side. The average gradient of the slope is about 1:2 (i.e. 26 degree) along the site.

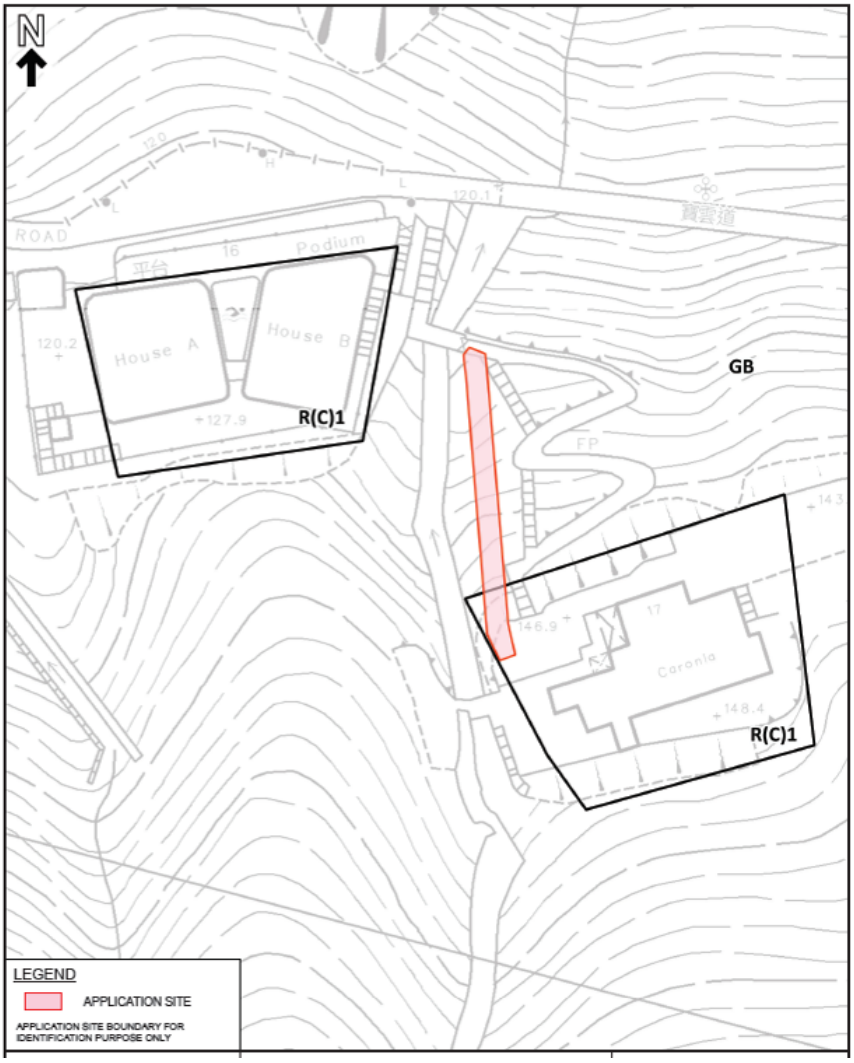


Figure 1: Site Plan

(3) The uphill side of the Site is protected by the existing platform of building, Caronia.

3.2 Proposed Foundation Works

The existing soil profile will be trimmed locally to provide a branched flat platform for strip footing of the R C trough. Soil nails will be installed to the affected slopes as necessary.

3.3 Proposed ELS Works

Temporary sheet pile / pipe pile with temporary open cut slope along both sides of the Site may be adopted for temporary excavation works of the proposed development.

3.4 Proposed Access during Construction Works

There is no accessible road directly to the subjected Site at this moment. We propose that all material and plants shall be transported via existing public road/ footpath. The proposed development involves only soil nail, concrete work and back-filling that can be transported to the Site easily.

Annex C

Reference Local Projects and Sensitive Design Features

Reference Local Projects

1. Inclined Lift at Discovery Bay

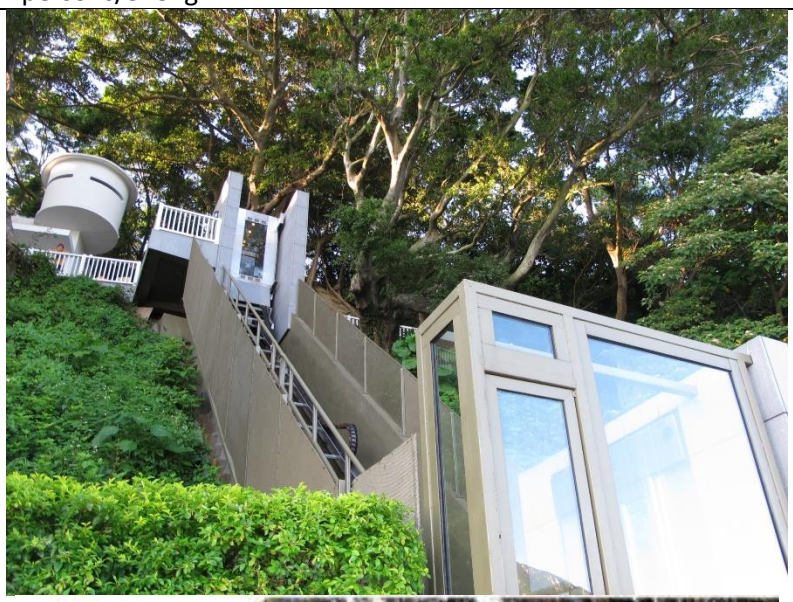
- Manufacturer: Rhine Lift Manufacture Co Ltd (Rhine)
- Construction year: 2016
- 2 inclined traction lifts
- Travel distance: 59 m
- Capacity: 1800 kg/24 persons
- Lift dimensions: Width: 2,400 mm; depth: 1,600 mm; height: 2,500 mm

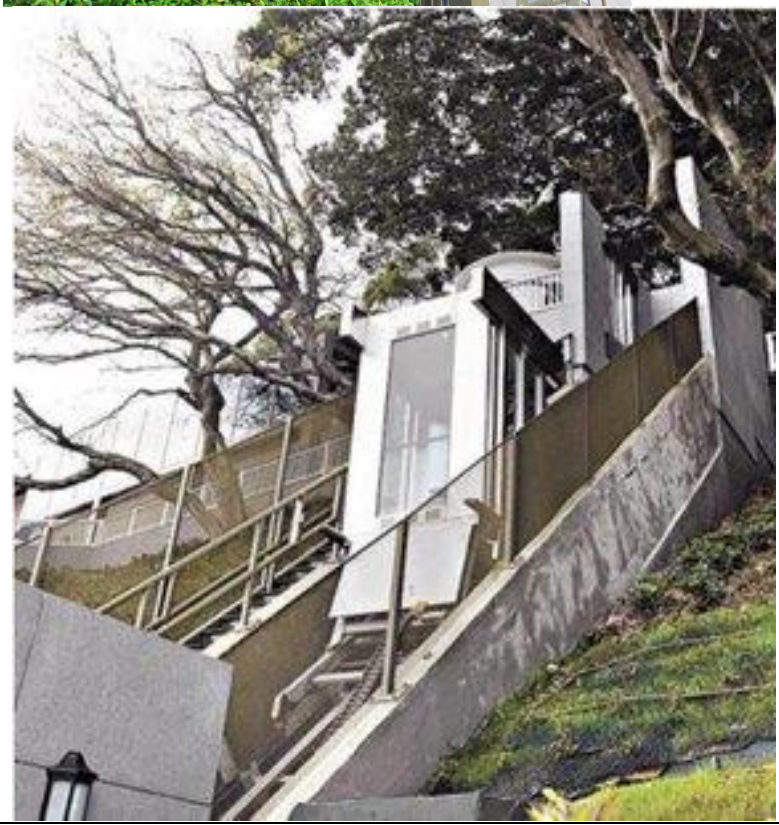
2. Inclined Lift at Po Fook Hill

- completion year: 1990
- 1 inclined lift
- Capacity: 9 persons/750kg

3. Tai O Heritage Hotel

- Manufacturer: Rhine Lift Manufacture Co Ltd (Rhine)
- completion year: 2013
- 1 inclined lift
- Travel distance: 17.321 m
- Capacity: 7 persons/525kg





Source: Information retrieved from internet

Reference Sensitive Design Features

(Compact size, non-reflective materials & natural colour scheme)

Reference #1	
Reference #2	

Annex D

Responses-to-Comments Table (Pre-submission Stage)

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)	
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.	Noted. The declared monument and its immediate environs will not be affected by the Proposal.
Comments from Transport Department (Contact Person: Ms. Annie Ka-yuet TANG, Tel: 2829 5458)	
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.	Noted.
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.	Noted.

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
Comments from Drainage Services Department (Contact Person: Mr. Calvin Lo, Tel: 3101 2364)	
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:-	Noted.
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. 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).	Noted.
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.	Noted.
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.	Noted.

Comments	Responses
5. Appropriate sedimentation tanks for proper treatment of site discharge should be provided, properly maintained and operated.	Noted.
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.	Noted.
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.	Noted.
Comments from Water Supplies Department (Contact Person: Mr. Terry LAW, Tel: 2152 5737)	
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.	Noted.

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)	
Visual Aspect 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
Landscape Aspect General Comments 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.	Noted.
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.	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.
Advisory Comments 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.	Noted.
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.	Noted.

Comments	Responses
Comments from Electrical and Mechanical Services Department (Contact Person: Mr. Henry CHEUNG, Tel: 2808 3692)	
Electricity Safety 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.	Noted. Relevant electricity supplier will be contacted in later stage when details of proposed works are available.
Comments from Hong Kong Police Force (Contact Person: Mr. LUI Che-ho, Philip, Tel: 2860 1003)	
The construction company must provide staff to regulate on-site traffic.	Noted. Staff to regulate on-site traffic will be provided.
Construction vehicles should not be parked outside the site in a way which causes obstruction or blockage of the road.	Noted.
Comments from Lands Department (Contact Person: Ms. Phoebe TAI, Tel: 2835 1635)	
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.	Noted.

Comments	Responses
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. 86.2m^2, is subject to survey and our comment on such is reserved.	Noted. Please be clarified that the Development Site Area as stated in **para. 4.1.1** of **SPS** is approx. 89.6m^2.
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.	Noted.
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.	Noted.
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.	Noted.

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