

Responses to Departmental Comments

Item	Departmental Comments	Applicant's Responses
1. Comments from Geotechnical Engineering Office received on 25.2.2025 (Contact Officer: Ms. Candy CHO, tel: 2762 5383 / Ms. SIN Yin Man, tel: 2760 5700)		
	It is noted that the geotechnical comments for the Geotechnical Planning Review Report (GPRR) in our previous reply under the same file reference dated 20.11.2024 (enclosed) have not been addressed. As such, we wish to reiterate our previous geotechnical comments for the GPRR (in Annex 7 of this current submission).	Noted. The comments will be addressed in Geotechnical Assessment and/or Geotechnical Submissions stages.
<u>Previous comments on the GPRR dated 22.11.2024</u>		
1.	The Geotechnical Planning Review Report (GPRR) in Annex 4 of the planning statement is noted. There is no insurmountable problem envisaged from the geotechnical point of view regarding the subject application.	Noted.
2.	Nonetheless, minor geotechnical comments for the GPRR is noted and please convey the following comments to the applicant:	Noted.
	a) Section 2 – API shall be carried out to review the site conditions;	Noted. As discussed with the GEO officer, the information will be provided in the Geotechnical Assessment Submission Stage.
	b) Section 2.1 – Relevant as-built plans shall be supplemented;	Noted. It will be included in Geotechnical Assessment Submission Stage.
	c) Section 2.2 – Relevant information of the geotechnical features, including but not limited to the checking status, related reports and LPM status, shall be supplemented. Summary of the landslide incidents in the vicinity shall be provided;	Noted. It will be included in Geotechnical Assessment Submission Stage.
	d) Section 2.3 – The geology of the site shall be reviewed according to the latest geological map;	Noted. It will be included in Geotechnical Assessment Submission Stage.
	e) Section 3.1 – Groundwater table shall be reviewed in the detailed design stage;	Noted. It will be included in Geotechnical Assessment Submission Stage.
	f) Section 3.2 – Temporary working platform is envisaged. Elaboration on the effect of temporary works on the slope stability shall be supplemented; and	Noted. It will be included in Geotechnical Assessment Submission Stage.
	g) Sections 3.2 and 3.3 – Schematic diagrams of foundations, ELS and site formation works shall be supplemented.	Noted. It will be included in Geotechnical Assessment Submission Stage.

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2. Comments from Landscape Unit, Urban Design & Landscape Section, Planning Department received on 25.2.2025 (Contact Officer: Mr. Chak Man NGAI, tel: 3565 3955)		
1.	Based on the aerial photo of 2024, the Site is located in an area of Residential Urban Fringe landscape character surrounded by vegetated slopes and low-rise to high-rise residential buildings. According to the aerial photo and the information provided, the site is mainly a slope covered by existing trees and vegetation, with a small portion of pedestrian trail. The proposed development under this planning application, which involves felling of all trees within the Site, will alter the existing landscape character of the Site and its surroundings.	Noted. The Site is currently an unallocated and unleased government land (UUGL). The current Proposed Access Road for accessibility to IL 6621 S.A is a minimum provision after receiving comments from relevant government departments. All trees indicated in this submission are slope trees, only trees in conflict with the future construction works of building the bridge will be proposed "felled".
<u>Annex 5 Landscape Report</u>		
2.	According to Sections 3.1 to 3.5, 35 existing trees of common species with heights ranging from 5m to 14m, crown spreads from 3m to 15m, and DBHs from 100mm to 530mm were surveyed within the Site. No registered Old and Valuable Trees (OVTs) or rare species were identified. All surveyed trees within the Site are proposed to be felled as they would unavoidably be affected by the proposed works and are not suitable to be transplanted. Impact on existing landscape resources within the site arising from the proposed development is anticipated. Moreover, it is observed from the Tree Survey Plans in Appendix B that many existing trees outside the site/within the same Green Belt zone are very close to the site boundary, which are also likely to be affected by the construction of the proposed works.	Noted. The slope trees within the planning application boundary will be unavoidably affected and will require felling. Conversely, any new works in close proximity to the trees outside the planning application site boundary will be minimised to mitigate adverse impacts. Therefore, those trees are proposed to be retained and are not included in this submission.
3.	According to the Tree Survey and Treatment Plans in Appendix B, three trees with ID no. T13, T52 and T9 are outside the site boundary but included as trees within the site. Please clarify and rectify all inconsistencies in all relevant text/tables/drawings of the Planning Statement.	Noted. 6 nos. trees (T9, T13, T52, T152, T160 & T190) outside the site boundary were excluded in this submission. It is opined that the design of the structure and the new public access can be adjusted in detailed design stage to avoid direct conflict to these outside site trees. Revised report is attached at Annex 1 .

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4.	<p>With reference to Section 3.6 and Table 7, a maximum of 13 <i>Ficus microcarpa</i> var. <i>crassifolia</i> with 1m spread and 2.5m height (DBH is not specified) at minimum 1.5m spacing are proposed in the new strip planter within the site to compensate from the loss of 35 existing trees at a ratio of 1:0.37 in terms of tree numbers. As illustrated the Landscape Section –A, the proposed planting along the appear to be in form of hedge/shrubs. Considering the anticipated amount of tree canopies lost, the proposed planting of these small plants to mitigate the landscape impact is not effective/insufficient. The applicant should explore opportunities on enhancement of landscape mitigation measures within the site as far as practicable, and native tree species should also be considered. The applicant should also specify the proposed DBH, as well as the minimum clear soil width and depth. The applicant is also reminded that <i>Ficus</i> species with aggressive root system should be avoided in narrow planting areas.</p>	<p>Noted. Please find below our justification for your consideration. Possible opportunities are to seek:</p> <ul style="list-style-type: none"> - Compensatory trees outside site boundary, which is UUGL, was proposed in former submission. Referring to LandsD's comments on the former submission, it is not acceptable; - New whip trees with hydroseeding are proposed for the lowest slope area underneath the Proposed Access Road, as this will provide sufficient headroom to compensate for the loss of greenery, particularly closed to the opposite neighbour side; - 5 nos. of new trees are now proposed in this new strip planter along the Proposed Access Road to compensate the loss of greenery when walking along Tai Hang Road. Tree planting allows better instant effect; - Together with another 35 nos. of whip trees proposed on the slope area, the compensation ratio to the tree lost in terms of quantity is enhanced to 1:1.38; - No more planting area is proposed or otherwise more existing trees will be affected. <p>Please refer to the revised Landscape Proposal at Annex 1.</p>
5.	<p>Shrubs/groundcovers underneath the proposed new access road is illustrated in Landscape Section – A. The applicant should annotate these shrubs/groundcovers, clarify whether they are proposed new vegetation or existing vegetation to be reinstated (if damaged) and if the vegetation could grow in healthy condition under shade.</p>	<p>Noted. Landscape Sections have been updated. Please refer to Annex 1.</p>
6.	<p>The applicant should be advised that approval of the application does not imply approval of tree works such pruning, transplanting and felling under lease. 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>
3. Comments from Hong Kong District Planning Office, Planning Department received on 25.2.2025 (Contact Officer: Jacky LEE, tel: 2231 4603)		
	<p>According to our site visit record, there is a DSD catch pit (Ref. No. SCH 7002620) at the downslope right next to the end of the proposed footpath near to the rear of 16 Tai Hang Road. Please advise whether the related drainage system would be affected by the proposed access road.</p>	<p>Existing catch pit (Ref. No. SCH 7002620) will be modified in according to DSD standard and there is no effect brought by the proposed access road. Detailed modification/construction design will be formulated at the General Building Plan submission.</p>

4. Comments from Highways Department received on 27.2.2025 (Contact Officer: Ms. Iris CHEUNG, tel: 2231 5618)	
Our previous comments on the Pre-Submission Consultation excluding Para 1(i) remains valid. Other comments are included as following:	
(a)	<p>From the Swept Path Analysis, the proposed run in/out's dimension is not given. However, the right wing of the run in/out is much bigger than the left wing which is not designed according to HyD Drawing No. H1113 (where the width of the wings has the dimension of 1500mm wide). Also, it may slightly block the entrance of the building, thus the design of the run in/out and may be reviewed. Point XYZ of the vehicular access should be advised by TD.</p> <p>The wing of the proposed run-in/out (Right side and Left side) will follow in accordance with the HyD standard drawing H1113 to maintain the dimension of 1500mm wide. The updated run-in/out and swept path analysis drawings are attached at Annexes 3 and 4 respectively for your review.</p> <p>Following the approval of the planning application, further discussions regarding Point XYZ of the vehicular access will be undertaken with the Lands Department (LandsD) and the Transport Department (TD). These consultations will ensure that the proposed vehicular access aligns with the necessary regulatory requirements and standards set forth by both departments.</p>
(b)	<p>Any affected pavement and street furniture should be reinstated to the latest HyD standards and to our satisfaction at the project proponent's own costs.</p> <p>Noted. The affected pavement and street furniture will be reinstated in compliance with the latest HyD standards, subject to HyD approval, with all expenses to be borne by the Applicant.</p>
(c)	<p>We presume that the proposed bridge would be managed and maintained by the developer at their own cost.</p> <p>Noted. The Proposed Access Road will be managed and maintained by the Applicant at their own cost.</p>
(d)	<p>The proponent should consult relevant utility undertakers for any necessary diversion of existing underground utilities to make way for the proposed run in/out.</p> <p>Noted.</p>
5. Comments from Food and Environmental Hygiene Department received on 27.2.2025 (Contact Officer: Miss. Yoyo NG, tel: 3141 1229)	
Our previous comments dated 15 Nov 2024 in respect of the pre-submission are still valid and we have no further comment on the subject planning application please.	
Noted.	

6. Comments from Architectural Services Department received on 7.3.2025 (Contact Officer: Sherman SUM, tel: 2582 5314)		
It is noted that the photomontages from vantage points of VP1 to VP3, the proposed access road may not be incompatible with the surrounding environment. We have no particular comment from the architectural and visual impact point of view; subject to PlanD's view. However, the applicant may wish to consider the treatment/articulation of the proposed access road in the design stage to blend in more harmoniously with the surrounding neighbourhood.		Noted. Design treatments of the Proposed Access Road will be further explored during the detailed design stage.
7. Comments from Agriculture, Fisheries and Conservation Department received on 7.3.2025 (Contact Officer: Ms. Karrie WU, tel: 2150 6942)		
It is noted that the subject site falls within Green Belt zone in between developed residential sites and next to a road. Considering that trees to be felled are of common species and compensatory tree planting would be provided, we have no adverse comment on the planning application.		Noted.
8. Comments from Environmental Protection Department received on 7.3.2025 (Contact Officer: Ms. Kathy HO, tel: 2835 1847)		
We note that some of our comments offered during pre-submission are not yet addressed. The applicant should address in the planning statement.		Please note that pre-submission comments regarding air quality and noise aspects have already been addressed in paragraph 5.8.4 of the planning statement.
1.	Should the application be approved, good site practices and necessary dust control measures as stipulated in the Air Pollution Control (Construction Dust) Regulation shall be implemented to minimise the dust impact at the nearby ASRs during construction phase.	Noted. Relevant measures and controls will be applied in accordance with the established procedures.
2.	The project applicant should consider the guidelines in relevant practice notes where applicable. ProPECC PN1/24 Minimizing Noise from Construction Activities was issued and superseded ProPECC PN1/93, PN2/93 and PN1/96. The applicant is reminded to comply with the relevant legislations/guidelines.	Noted. Relevant measures and controls will be applied in accordance with the established procedures.
9. Comments from Urban Design Unit, Urban Design & Landscape Section, Planning Department received on 7.3.2025 (Contact Officer: Ms. Vanessa TSANG, tel: 3565 3942)		
1.	According to the planning statement submitted by the Applicant, the proposed access road, which falls within an area largely zoned "GB" with minor encroachment onto the "R(B)" zone and an area shown as 'Road,' is an ancillary use to the residential redevelopment at 58 Tai Hang Road in the "R(B)" zone. Based on the site photos provided in Annex 2 of the planning statement, the current resident entrance of 58 Tai Hang Road is located within the car parking area of 60 Tai Hang Road. According to the planning statement, the proposed access road will provide vehicular and pedestrian access for the residents, which will also serve as emergency vehicle	Noted.

	access for 58 Tai Hang Road and a footpath for public use.	
2.	The application site (the Site) is surrounded by green slope and low to medium density residential developments. According to the photomontages provided in Annex 8 of the planning statement, the Site is a vegetated steep slope next to Tai Hang Road. Given that the Site is screened off by vegetation, significant visual impact on the surroundings is not anticipated.	Noted.
10. Comments from Buildings Department received on 10.3.2025 (Contact Officer: Ms. Janet LI, tel: 3162 8807)		
	<u>Proposed Elevated Access Road and Architectural Drawings</u>	
(a)	(As per the application form and Sections 1.1.2 and 1.1.4 of the submitted planning statement, the planning application is to propose a new access road and a new footpath on Government Land (G.L.) in order to improve the vehicular and pedestrian access and safety to the residential site. Since the proposed access road and footpath are to be erected on G.L., they are outside the purview of the Buildings Ordinance (BO).	Noted.
(b)	Regarding the architectural drawings for 58 Tai Hang Road (THR), detailed comments under the BO could only be provided upon the submission of General Building Plans (GBP).	Noted.
11. Comments from Water Supplies Department received on 10.3.2025 (Contact Officer: Terry LAW, tel: 2152 5737)		
	<u>Other Detailed Comments (if applicable):</u>	
1.	Please note that there are some existing fresh water mains within the site and are affected by the proposed works. 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. Detailed construction design of the proposed access road will be formulated at the General Building Plan submission. Relevant proposals will be submitted to WSD for approval if necessary.

2.	Please find attached partprint of our mains record plans showing the existing water mains in the vicinity of the captioned site for your information. Please note that the alignments of the water mains are indicative only. The exact lines and levels of our water mains should be established by hand dug trial pits on site if they are of significance to your works. Some changes might have been made to the information shown on the drawings in the course of time and that digging of trial holes to ascertain the exact alignment and depth of water mains would still be necessary before any road excavation.	Noted.
12. Comments from Leisure and Cultural Services Department received on 10.3.2025 (Contact Officer: Mr. Kaizer CHAN, tel: 2601 8687)		
Please find the below comments/replies from the relevant units of this Department for your further action:-		Noted.
	<p><u>Hong Kong East Tree Team</u></p> <p><u>General</u></p> <ul style="list-style-type: none"> It is observed that the proposed development will affect some trees under the purview of LCSD on UUGL. From the tree preservation point of view, the project proponent should make every possible measures to preserve and protect the existing trees from being adversely affected through careful and proper planning, design, implementation of protective measures, site monitoring and post-construction maintenance at all stages of the project. Should trees be inevitably affected, the project proponent should adhere to the procedure and requirement stipulated in DevB TC(W) No. 4/2020 and relevant guidelines promulgated by the Greening, Landscape and Tree Management Section of Development Bureau on tree preservation. 	Noted. The trees proposed for removal are primarily due to conflicts with future works. A Tree Preservation and Replacement Plan (TPRP) will be submitted to the relevant government department for formal approval, subject to the Responsible Party for the land in the future.
	<p><u>Landscape Proposal & Tree Treatment Proposal</u></p> <ul style="list-style-type: none"> DevB TC(W) No. 4/2020 - Tree Preservation should also be included in Section 1.1. It is observed that only 35 nos. of tree that are in direct conflict with the proposed development and proposed to be felled were surveyed. However, those trees near the works boundary which may also be affected by the proposed development and will need for protection or maintenance during the construction stage were not surveyed. According to the DevB TC(W) No. 4/2020, implementation of compensatory tree planting should be of a ratio not less than 1:1 in terms of number. However, in this proposal, 35 nos. of tree are proposed to be felled but only 13 nos. of new tree will be planted. 	<p>Noted. Please find our below justification for your consideration. Possible opportunities are sought:</p> <ul style="list-style-type: none"> Compensatory trees outside site boundary, which is UUGL, was proposed in former submission. Referring to LandsD's comments on the former submission, it is not acceptable; New whip trees with hydroseeding are proposed for the lowest slope area underneath the Proposed Access Road, as this will provide sufficient headroom to compensate for the loss of greenery, particularly closed to the opposite neighbour side;

	<ul style="list-style-type: none"> • The proposed compensatory tree species, <i>Ficus microcarpa</i> var. <i>crassifolia</i> seems more like shrub instead of tree. • The future maintenance party of the compensatory tree should be identified in the proposal. 	<ul style="list-style-type: none"> - 5 nos. of new trees are now proposed in this new strip planter along the Proposed Access Road to compensate the loss of greenery when walking along Tai Hang Road. Tree planting allows better instant effect; - Together with another 35 nos. of whip trees proposed on the slope area, the compensation ratio to the tree lost in terms of quantity is enhanced to 1:1.38; - No more planting area is proposed or otherwise more existing trees will be affected. <p>Revised report is attached at Annex 1.</p>
	<p>Wan Chai District Leisure Services Office (WchDLSO) Given no existing facilities nor amenity areas under WchDLSO's purview are identified to be affected, we have no further comment on the proposed access road.</p>	Noted.
13. Comments from Transport Department received on 20.3.2025 (Contact Officer: Mr. Sammy WONG, tel: 2829 5262)		
1.	<p>Base on our record, IL 6621 was divided into S.A (i.e. the Lot) (which accommodates the 5-storey extension) and the R.P. (which accommodates the original building and the car parking for S.A) by an assignment by private parties. Also, it is noted that the carving out of IL 6621 in 1970 and the subsequent redevelopment of the Adjoining Lot in 1986 mentioned above had rendered the Lot in breach of the car parking requirement. In this connection, a temporary waiver waiving the parking requirement for the lifetime of the building standing on the Lot only was granted via a waiver letter dated 22 November 1988. Therefore, subject to any further advice from LandsD, we consider that the lot owner should already know the limitation and uncertainty of the vehicular access and/or right-of-way to be allowed by adjacent lot in the planning of redevelopment and there should be no obligation by Government to provide separate vehicular access to the lot owner.</p>	<p>Noted. As stated in the Planning Statement, the legal capacity to grant the right of way is held by the developer of 60 Tai Hang Road, which has since been dissolved. This situation necessitates our submission of a planning application to seek a new right of way. In this regard, we will consult with the Planning Department and Lands Department.</p> <p>In addition, without consent from 60 Tai Hang Road (THR) for 58 THR to rightfully use the passageway and without the Proposed Access Road, the only way to transport construction materials to 58 THR would be to build a temporary cantilever platform over the existing slope abutting 60 THR. This would require consent from the relevant departments, such as the Lands Department. Upon completion of the construction works, the owners of 58 THR would need to reinstate the strip of Government Land.</p> <p>It is foreseeable that permits or consents from government departments will be necessary each time future occupants of 58 THR carry out alteration and addition (A&A) works, minor works, routine maintenance, or home decoration. Reinstatement will be required after each set of works, and the construction and dismantling of such a temporary cantilever platform would cause inconvenience to 60 THR. Such repeated construction and dismantling works would no doubt cause repeated nuisance to the local residents of 58 and 60 THR.</p>

		Given that this approach is neither efficient nor cost-effective, the Proposed Access Road in the current submission is deemed more viable and sustainable in the long term for facilitating future residential redevelopment at 58 THR.
2.	We would like to clarify that the use of government land for any private purpose (i.e. to construct an access road) should be subject to LandsD's and PlanD's view from land administration and/or planning perspective.	Noted.
3.	From traffic engineering perspective, the lot owner should consider the appropriate traffic and transport arrangements to support the construction and operation of the proposed redevelopment under the given land conditions and constraints.	The traffic and transport assessment studies, designed to support the construction and operation of the proposed redevelopment, will be submitted to the relevant departments for review after obtaining planning application approval, considering the prevailing land conditions and constraints.
14. Comments from Lands Department received on 28.3.2025 (Contact Officer: Ms. Michelle WONG, tel: 2835 2169)		
1.	As shown in the Architectural Drawings at Annex 4 of the PS, there is a narrow strip of unattended Government land sandwiched in between the Proposed Access Road and the adjoining private lots (the Lot and IL6621 R.P. & Ext.). While it is not certain whether such spare area between the Proposed Access Road and the said private lots is intentional or not, the applicant has to provide justifications on not including such unattended area for consideration by the Government. Subject to no adverse comments from relevant departments, the management and maintenance responsibilities of the said strip of land (though structurally not forming part of the Proposed Access Road) may have to be assigned to the applicant through the lease modification and or other appropriate land documentation.	Noted. The spare area is reserved as a buffer from the adjoining residential building, which is intended for a working space for construction of access road as well as to minimise disturbance to the residential buildings during the construction stage and future maintenance stage of the access road.

2.	As stated in para. 4.1.3 of the PS, the applicant has committed to being responsible for the future maintenance and management of the Proposed Access Road. It is presumed that these responsibilities extend to the entire Proposed Access Road, including the vehicular access road, the turntable, the pedestrian walkway with staircase and any associated structures or features erected thereon, such as the proposed planter, as well as any vegetation (including but not limited to the 13 nos. of compensatory trees within the planter as proposed in para. 4.1.5 of the PS) and slopes affected by the construction of the cantilevered Proposed Access Road. Furthermore, subject to the clarification from the applicant and the advice from TD and HyD, the Proposed Access Road may have implications under the Roads (Works, Use and Compensation) Ordinance (Cap 370) ("the Ordinance"). In the event that gazettal for the proposed road works under the Ordinance is required, the applicant shall be liable to pay the Government all relevant costs including compensation.	Noted. The Applicant will be responsible for the future maintenance and management of the Proposed Access Road, including the turntable, pedestrian and any associated structures or features erected as well as the vegetation and slope area affected by the Proposed Access Road.
15. Comments from Road Management Office, Hong Kong Police Force received on 28.3.2025 (Contact Officer: Ms. Raymond LAM, tel: 3660 1887)		
	From regional traffic police perspective, please be informed that Traffic Hong Kong Island of HKPF have no specific traffic comment on the application. It is advised that each Temporary Traffic Arrangement (TTA) involving works on footpath and/or carriageway should be submitted to this office and Transport Department for comment before implementation.	Noted. TTA will be submitted for approval if necessary.