

Annex 8

Responses to Public Comments

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Item	Summary of Public Comments	Applicant's Responses
1. Landscape Aspect		
1.	The Proposed Access Road will bring adverse impacts on and alter the surrounding natural landscape environment which is in contradiction with the principles as set out in the Town Planning Board Guideline No. 10.	Considering most of the surrounding area is already clustered with low to medium dense residential developments, the scale, design and layout are considered not incompatible with the surrounding built-up character. Moreover, the Applicant has demonstrated efforts to preserve the existing landscape environment by ensuring that the tree loss will be compensated along and underneath the Proposed Access Road.
2.	The compensatory planting proposal with a ratio of 1:0.37 for the removal of 35 nos. of trees is inadequate.	Under the current revised proposal, the nos. of trees to be felled has been reduced to 29. The compensatory planting is also increased to achieve a compensation ratio of 1:1.38, which fulfils a ratio of not less than 1:1 as required under the DevB TC(W) No. 4/2020.
2. Slope Safety Aspect		
1.	The Proposed Access Road will pose a risk to the slope stability, leading to an increased risk of landslides for nearby residents.	A Geotechnical Planning Review Report (GPRR) has been prepared to demonstrate that the Proposed Access Road will not bring adverse impacts on the surrounding slope stability.
2.	No detailed geotechnical assessment has been provided. The submitted geotechnical report was overly brief.	The GPRR has also been reviewed by relevant government departments, and no adverse comments were received. Other details of the geotechnical information will be formulated during the Geotechnical Assessment Submission Stage and will be submitted to government departments for approval.
3. Traffic Aspect		
1.	The approved GBP for the redevelopment of 58 Tai Hang Road implied that the Proposed Access Road is not necessary for the provision of emergency vehicle access, and it should not be a hurdle for the redevelopment of 58 Tai Hang Road.	The main purposes of the Proposed Access Road are to serve the car parking and the loading/unloading of the redevelopment of 58 Tai Hang Road. The Applicant has taken this opportunity to provide a proper emergency vehicular access (EVA) for the redevelopment of 58 Tai Hang Road, with the design of EVA following strictly Buildings (Planning) Regulation paragraph 41D and Code of Practice for Fire Safety in Buildings 2011 (June 2023 Edition). The general building plan as approved by the Buildings Department on 28 March 2024 does not have an EVA provision as it is exempted under B(P)R 41D (1) through the implementation of enhanced fire services provision such as staircase pressurization system, etc. Such non-provision of EVA is just a

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		compromise due to physical constraints of the site, and EVA provision is undoubtedly the more reliable way of fire safety provision.
2.	The justification for proposing a loading/unloading bay for the redevelopment scheme is uncertain.	The inclusion of a loading/unloading bay in the redevelopment scheme is justified based on the HKPSG requirements of the future redevelopment of 58 Tai Hang Road. The loading/unloading bay is intended to facilitate the efficient movement of goods and materials to and from the site, ensuring operational sustainability while minimizing disruption to surrounding traffic conditions. This provision aligns with standard practices for developments of this nature and scale.
3.	The Proposed Access Road will cause additional traffic along Tai Hang Road.	The impact of the Proposed Access Road on traffic along Tai Hang Road has been carefully considered. Given the existing road network and traffic patterns, the design aims to minimize congestion by optimizing vehicle flow and ensuring smooth accessibility. Nonetheless, the additional traffic generated from the Proposed Access Road is forecasted to be 4 vehicles (Generation) / 4 vehicles (Attraction) in AM Peak; 4 vehicles (Generation) / 4 vehicles (Attraction) in PM Peak. Hence, the increase in traffic flow is considered minimal and there will be limited traffic impact on Tai Hang Road.
4.	No evidence shows that the proposed access road will enhance external traffic conditions and public safety on Tai Hang Road.	While there may be concerns about the impact of the Proposed Access Road, its design has been carefully planned to optimize traffic flow and enhance road safety. Traffic assessments and planning measures have been conducted to ensure smooth vehicle movement while minimizing disruption. Additionally, provisions such as traffic marshals and safety measures will be in place to further support public safety along Tai Hang Road.
4. Environmental Aspect		
1.	The removal of trees will harm natural landscape and degrade the biodiversity of the "GB" area.	According to the Landscape Proposal and Tree Preservation and Removal Proposal prepared for the Proposed Access Road, it is demonstrated that the general conditions of the surveyed trees within the application site were mostly poor to average. No registered or potential "Old and Valuable Trees", nor rare or endangered tree species, were recorded within the application site. Hence, along with the compensatory planting to be provided, there is no adverse impact on the natural

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		<p>landscape. Furthermore, the application site is not located near any environmentally sensitive areas. Given that the vicinity of the application site is already dominated by existing residential buildings, the Proposed Access Road should not be considered harmful to the biodiversity of the "GB" area.</p>
2.	<p>There will be noise disturbance and air pollution generated from the Proposed Access Road.</p>	<p>A strip of land with about 1.5m in width 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.</p> <p>Nonetheless, the additional traffic generated from the Proposed Access Road is forecasted to be 4 vehicles (Generation) / 4 vehicles (Attraction) in AM Peak; 4 vehicles (Generation) / 4 vehicles (Attraction) in PM Peak. Hence, there will be very limited traffic flow and no adverse environmental impact on the surroundings is anticipated.</p>
5. Local Neighbourhood Aspect		
1.	<p>There was a lack of prior consultation with local residents, in particular, 60 and 70 Tai Hang Road.</p>	<p>The application was formally and officially published for public consultation under the statutory planning mechanism.</p>
2.	<p>The proposed pedestrian stairs connecting the upper and lower Tai Hang Road provide no public gain and are considered unnecessary, given there is already existing public transportation running along Tai Hang Road.</p>	<p>The proposed pedestrian stairs serve as an efficient alternative to public transport, enhancing accessibility and convenience for residents. While existing public transportation operates on a fixed schedule, the stairs offer a direct route that reduces travel time and cater to pedestrians seeking quick access between the upper and lower Tai Hang Road.</p>
3.	<p>The proposed pedestrian stairs are unsafe as it is steep along the slope and will bring nuisance by passersby to the nearby residents.</p>	<p>The stairs will be designed in accordance with established standards to ensure pedestrian safety. The detailed design of the stairs will be developed at a later stage after planning approval, with an aim to ensure that any potential nuisance to the nearby residents is minimised.</p>

6. Land Administrative Aspect		
1.	The Applicant should already be aware of the development constraints of the ROW arrangement. It should not be a justification for proposing a new access road.	The Applicant has demonstrated the best effort to obtain consents as required from the land administrative aspects. As explained in the Planning Statement, the ROW of 58 Tai Hang Road shall obtain consent from the developer of 60 Tai Hang Road. However, the Applicant was unable to obtain consent from the developer of No. 60 Tai Hang Road due to its deregistration status. This status has rendered the developer uncontactable and without a legal entity to provide the necessary permissions.
7. Overall Design and Technical Feasibility		
1.	No detailed technical assessments were provided to demonstrate that no adverse impacts will be brought by the Proposed Access Road, e.g. Visual Impact Assessment, Traffic Impact Assessment, Drainage Impact Assessment, Environment Assessment.	Considering the scale and nature of the Proposed Access Road, technical assessments on visual, drainage and environment are deemed unnecessary at this stage. Nonetheless, technical assessments shall be provided upon request from relevant government departments or during the approval condition stage.
2.	A similar previous application in the vicinity along Tai Hang Road (i.e. Application No. A/H6/87) demonstrated that such access road development in “GB” zone should not be approved by the Town Planning Board.	We believe that the scale of development for the previous application (Application No. A/H6/87) differs from the road development proposed in the current application and should not be directly compared.
3.	The footprint of the Proposed Access Road occupies an unreasonable portion of “GB” government land. Alternative should be explored.	The footprint of the Proposed Access Road has already been minimised while keeping the design in accordance with the standards as required by government departments.
4.	The Proposed Access Road contradicts the planning intention of the “GB” zone.	Although the Application Site is located within “GB” zone, the immediate surroundings are already clustered with low-to-medium-dense residential developments, which are zoned as “R(B)” and “R(C)”, subject to a maximum plot ratio of 5 and maximum building height of 30 storeys, and a maximum plot ratio of 2 and maximum building height of 6 storeys respectively. The Proposed Access Road is an ancillary use of the residential redevelopment at 58 Tai Hang Road in the “R(B)” zone and is considered part of the residential development and is not incompatible with the surrounding land uses and development intensity.