

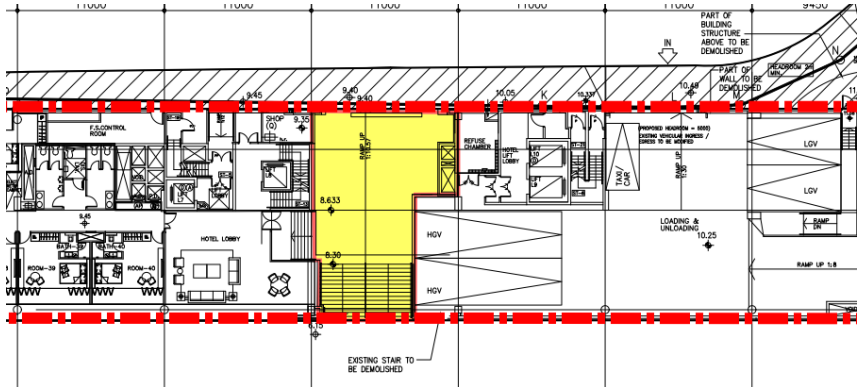
**S.16 Planning Application  
Proposed Conversion of Part of The Pulse into Hotel in  
“Other Specified Uses (Beach Related Leisure Use)” and  
“Government, Institution or Community” Zones  
at No. 28 Beach Road, Repulse Bay**

**(Planning Application No. A/H17/143)**

Comments	Responses
<b>Comments from Food and Environmental Hygiene Department (received on 28 February 2025) (Contact Person: Mr. Vincent LO, Tel: 2903 0402)</b>	
The works shall not:	Noted.
(i) occupy area of Repulse Bay Public Toilet (near Life Saving Association) and the connected allocated land (No. GLA-HK 1129) which is very close to the site; and	
(ii) affect daily operation of the aforesaid public toilet.	Noted.
<b>Comments from Drainage Services Department (received on 28 February 2025) (Contact Person: Mr. Ray ZHOU, Tel: 3101 2366)</b>	
1. There is no DIA in the submission. The site is fully paved already and there should be no adverse drainage impact after development. I have no comment on the development in drainage assessment aspect.	Noted.
<b>Comments from Architectural Services Department (received on 28 February 2025) (Contact Person: Mr. Sherman SUM, Tel: 2582 5314)</b>	
2. Based on the information provided, it is noted that the building bulk and building height at 18.05mPD of the development remain unchanged. The R-to-C Table enclosed in the application is mainly in response to the comments from various departments. We have no particular comment from architectural and visual impact point of view, subject to PlanD's view. However, the applicant may wish to consider the treatment/articulation of the building facade facing Repulse Bay in the design stage to blend in more harmoniously with the surrounding neighborhood as Repulse Bay is one of the tourism attractions.	Noted. The treatment/articulation of the building façade facing Repulse Bay will be further studied and explored in detailed design stage.

Comments	Responses
<b>Comments from Environmental Protection Department (received on 28 February 2025) (Contact Person: Mr. Andy KO, Tel: 2835 1011)</b>	
1. Section 4.10.2 - Please confirm whether a chimney (e.g. a centralised water heating system with boiler with chimney) will be included in the conversion for the proposed hotel. If affirmative, please confirm if the buffer distance requirement for chimney as stipulated in the Hong Kong Planning Standards and Guidelines can be fulfilled.	Centralised water heating system boiler with chimney will not be used for the conversion of the proposed hotel.
<b>Comments from Environmental Protection Department (received on 9 May 2025) (Contact Person: Mr. Andy KO, Tel: 2835 1011)</b>	
1. The applicant must adhere to the HKPSG and comply with all relevant pollution control regulations. Additionally, the applicant should clearly state their proposed measures for meeting these requirements in the planning statement.	Noted. The proposed hotel will comply with the HKPSG and all relevant pollution control regulations. <b>Section 4.10</b> has been updated accordingly to include the proposed measures for meeting these requirements ( <b>Annex A</b> refers).
<b>Comments from Hong Kong District Planning Office, Planning Department (received on 28 February 2025) (Contact Person: Ms. Alice WONG, Tel: 2231 4671)</b>	
1. Please elaborate on how the proposal can meet the planning intention of the "OU(BRLU)" zone, especially any design feature that can help the hotel blend in harmoniously with the environment in terms of use and design.	<p>According to the Notes of the Shouson Hill &amp; Repulse Bay OZP, the planning intention of "OU(BRLU)" zone is <i>"intended to enhance the role of Repulse Bay as a recreational and tourism district, as well as maintaining the existing beach related character of the developments. Future development/redevelopment should blend in harmoniously with the environment in terms of use and design."</i></p> <p>From the tourism perspective, as a prominent beach front site at Repulse Bay, the proposal presents a unique opportunity to elevate the area into a premier recreational and tourism district. By introducing the highly sought-after hotel accommodation directly abutting the Repulse Bay Beach, the proposal will offer the much-needed and currently absent beachside resort accommodation to both local visitor and international tourists, as well as strengthening Repulse Bay's role as a renowned tourism spot.</p> <p>Further, the proposed hotel will feature an array of amenities, ranging from ancillary restaurant, gym and spa are also proposed within the hotel, thereby offering a one-stop holiday and recreational enjoyment to the visitors. To further enrich the tourism experience and align with the charm of Repulse Bay, water-based activities and training courses (e.g. soaking</p>

Comments	Responses
	<p>and kayaking) will also be promoted. In this regard, the proposed hotel will blend in harmoniously with the Repulse Bay environment and complement each other from a land use perspective.</p> <p>In terms of design, the LG/F (i.e. at-grade beachfront shops and restaurants) will be retained with a view to maintaining vibrancy of the beach and providing the essential retail and F&amp;B services, which will complement with the beach and the wider area. Not less, to maintain accessibility and connectivity, the existing pedestrian connections linking up Beach Road and Repulse Bay Beach through the Site will also be maintained. These combined features ensure that The Pulse, upon conversion, will continue to blend in harmoniously with the environment of Repulse Bay Beach and preserve the existing beach related character.</p>
2. Please advise the proposed hotel room size	The hotel room size ranges from approx. 200 to 800 sq ft. Most of which are about 300 sq ft subject to further revision in the detail design stage.
3. Please advise whether the gross floor area (GFA) include back of house (BOH) facilities, and advise the estimated GFA for the BOH facilities.	The Hotel concession for BOH facilities under PNAP APP- 40 has not been taken into account in the proposed GFA. Up to approx. 330 sqm (i.e. equivalent to 5% of the hotel GFA) may be used as BOH facilities, which is subject to further review, consideration and approval by the Building Authority at General Building Plan submission stage.
4. Please elaborate on how potential privacy and security issue can be addressed, in view that guestrooms are proposed on UG/F fronting Beach Road	<p>To address potential privacy issue, tinted or reflective glass are proposed for the guestrooms fronting Beach Road so as to protect the privacy of the guestrooms and avoid seeing through from the outside. Raised floor will also be explored to create sufficient level difference to avoid direct sight toward the inner guestrooms.</p> <p>Not less, window curtain and window locks will be used to address privacy and security concerns. There will be CCTV in common area for the managing staffs at all the time to ensure the security of the Proposed Hotel.</p>

Comments	Responses
<b>Comments from Hong Kong District Planning Office, Planning Department (received on 4 March 2025)</b> <b>(Contact Person: Ms. Alice WONG, Tel: 2231 4671)</b>	
<p>1. Currently, there is a pedestrian connection between Beach Road and Repulse Bay Beach through the application site (near the vehicular access in the southern part of the Site). It is observed that the concerned pedestrian connection is included in the proposed hotel area. In this regard, please clarify whether the pedestrian connection between Beach Road and Repulse Bay Beach through the application site will be maintained, and the public can pass through the Site via the connection without obstruction.</p> <p>Besides, whether any pedestrian connections will be provided in the northern part of the Site to connect Beach Road and Repulse Bay Beach?</p>	<p>For the avoidance of doubt, the existing pedestrian connection linking up the Beach Road and Repulse Bay Beach through the Site on LG/F &amp; UG/F (near the vehicular access in the southern part of the Site) (diagram below refers) will be maintained and that public can pass through the Site via the said connection without obstruction. The proposed hotel boundary is a broad demarcation and indicative only. The proposal does not involve any change/construction works pertaining to the said pedestrian connection.</p>  <p>For northern part of the Site, the existing pedestrian connection on LG/F falls outside of the proposed works area and will not be affected by the proposal.</p>
<b>Comments from Lands Department (received on 4 March 2025)</b> <b>(Contact Person: Ms. Irene LI, Tel: 2835 1552)</b>	
<p>2. If planning approval is given to the subject application, the owner of the Lot is required to apply to the LandsD for a prior written consent under lease or amendment to the Consent Letter dated 15.10.2014 for implementation of the proposal. Upon receipt of the formal application, LandsD would process such application in the capacity of a landlord and there is no guarantee that the application will be approved. If the application is approved, it will be</p>	<p>Noted.</p>

Comments	Responses
subject to such terms and conditions, including payment of premium and administrative fee, as may be imposed by LandsD at its absolute discretion.	
<b>Comments from Transport Department (received on 7 March 2025) (Contact Person: Mr. Vincent TAM, Tel: 2829 5407)</b>	
<p>1. Your traffic count survey was conducted in January 2025 which is a winter season. Please note that the traffic at this area will be more busy during summer season, in particular during summer holiday. The estimation of peak hour traffic flow at summer period using the daily traffic flow at ATC Core Station no. 1011, which is located between Repulse Bay and Stanley and outside your Area of Influence, should be reviewed and justified.</p>	<p>It is noted traffic in Repulse Bay area is usually busier during the summer season, hence, the traffic flow obtained from surveys conducted in January 2025 was adjusted to be in-line with the month of June, which according to the Annual Traffic Census ("ATC"), has the highest monthly traffic flow.</p> <p>The referenced ATC Core Station No. 1011, which is at Repulse Bay Road to the immediate east of the Junction of Repulse Bay Road / South Bay Road, i.e. J05 in our TIA Report, is the nearest core station. All traffic passing through this ATC station must also travel through the Area of Influence, hence, it is opined that the adjustment factor derived from this ATC station is representable.</p> <p>Figure 2.7 Rev B of the Updated TIA shows the Area of Influence, and location of the referenced ATC Core Station No. 1011.</p> <p><b>(Annex B refers)</b></p>
<p>2. It is noted that you have conducted a survey on the existing goods delivery demand of the subject development between 25 December 2023 to 7 January 2024. Please clarify the tenancy rate of the retail stalls during your survey period.</p>	<p>The Existing Development has a total of 44 shops, of which 35 were occupied during the survey period, i.e. the tenancy rate was approximately 80% [<i>Calculation: 35 / 44 x 100 = 80%</i>].</p>
<p>3. According to ATC Core Station no. 101 1, the traffic flow at weekend is higher than weekday. However, in accordance with Table 2.5 of your TIA, the existing junction performance at some of your assessed junctions perform better in weekend than weekday. Please review.</p>	<p>According to the 2023 ATC, traffic flow for Core Station No. 1011 is highest on Friday, followed by Saturday, which are both 103% higher than the daily average respectively. Hence, the traffic surveys in January 2025 were conducted on a Friday and on a Saturday.</p> <p>Table 1 summarises the observed traffic flow on Repulse Road and Beach Road during the weekday and weekend AM and PM peak hours.</p>

Comments	Responses																			
	<p>TABLE 1 OBSERVED EXISTING PEAK HOUR 2-WAY TRAFFIC FLOW (PCU/HR) ON REPULSE ROAD AND BEACH ROAD</p> <table><tr><th rowspan="2">Road Link</th><th colspan="2">AM Peak Hour</th><th colspan="2">PM Peak Hour</th></tr><tr><th>Weekday</th><th>Weekend</th><th>Weekday</th><th>Weekend</th></tr><tr><td>Repulse Bay Road</td><td>1,538</td><td>1,179</td><td>1,216</td><td>1,278</td></tr><tr><td>Beach Road</td><td>185</td><td>248</td><td>220</td><td>261</td></tr></table> <p>Table 1 shows the observed AM peak hour traffic flow on Repulse Bay Road is higher on weekend than weekday, which is opined to be due to less school and office-related activities during the weekend. Whereas, the PM peak hour traffic flow is higher during the weekend.</p> <p>For Beach Road, the weekend AM and PM peak hour traffic flows are higher, 185 vs 248, and 220 vs 261, respectively.</p> <p>Hence, operational performance for the analysed junctions are found to be generally better during the weekend AM Peak Hour than the weekday AM peak hour; and vice versa better during the weekday PM peak hour than the weekend PM peak hour.</p>	Road Link	AM Peak Hour		PM Peak Hour		Weekday	Weekend	Weekday	Weekend	Repulse Bay Road	1,538	1,179	1,216	1,278	Beach Road	185	248	220	261
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Beach Road	185	248	220	261																
4. Please note that the traffic at Beach Road is congested with high demand of kerbside activities during peak swimming season. Please assess the potential traffic impact to Beach Road in the peak swimming season.	Provision of internal transport facilities for the Proposed Conversion meets the HKPSG recommendation high-end recommendation, and all loading / unloading activities can be conducted within the Subject Site, hence, the loading / unloading activities associated with the Proposed Conversion will not have traffic impact to Beach Road.																			
5. For table 3.4 and 3.5, it is noted that the surveyed developments for estimation of weekend trip generation rates are located in the city center and easily accessible by public transport (i.e. MTR). Please demonstrate the surveyed developments are comparable to the subject development.	<p>The surveyed developments used for reference are revised to include: (i) the Existing Development for retail use, and (ii) WM Hotel, an existing hotel located in Sai Kung, for hotel use.</p> <p>It should be noted that the results of trip generation surveys referenced in Tables 3.4 and 3.5 were <b>NOT</b> used to derive the weekend trip rates directly, but to <b>determine the weekend / weekday ratio</b>, which is then to be applied to the weekday trip rates obtained from the TPDM in order to estimate the weekend trip rates.</p>																			

Comments	Responses
<p>6. According to Tables 3.4 and 3.5, the weekend/ weekday ratio is less than 1 for retail p.m. peak hour trip generation and hotel p.m. peak hour trip generation and attraction. Please review the above assumptions and provide the relevant survey details including survey date and methodology, room occupancy rate of the hotels during the surveyed period and the existing internal transport facilities of the surveyed developments for review.</p>	<p>The weekend / weekday ratios derived from Tables 3.4 and 3.5 of the Updated TIA have been reviewed and revised.</p> <p>Details of the survey date and methodology, room occupancy rate of the hotels during the surveyed period are presented in the Updated TIA.</p>
<p>7. According to para. 3.23, you have made reference to your pedestrian survey data for the WM Hotel in Sai Kung in Jan 2025 for estimation of the pedestrian generation rates for this project. According to the website of WM Hotel, the WM Hotel has around 260 nos. of hotel room and provided more than 270 nos. of car parking spaces and free shuttle bus services for the hotel. Please demonstrate that the pedestrian pattern for visitors of WM Hotel would be comparable to the subject development.</p>	<p><b><u>WM Hotel</u></b>  Similar to the Subject Site, the WM Hotel is also located remotely in a leisure area. Hence, it is opined the reference hotel has similar locational characteristic.</p> <p>Though the WM Hotel provides free shuttle bus service, the service is infrequent with headway of 75-minute with a total of only 6 return trips daily. The carrying capacity is also limited at no more than 30 passengers per trip. Hence, it is opined that the free shuttle service has no significant effect on the pedestrian generation.</p> <p>For the provision of car parking spaces, it is opined that guests travelling by private cars would also have little effect on the pedestrian generation as these guests would switch to taxi services if they were not driving.</p> <p><b><u>Additional Pedestrian Generation Surveys</u></b>  To provide more conservative analyses, results of additional pedestrian generation surveys of 2 hotels located in Central and Western District, obtained from the CKM in-house database were added. Although these hotels are in the city centre where there is convenient access to public transport services, the pedestrian generation of these 2 hotels are generally higher. In view that the pedestrian generation rates are relatively higher, the analysis conducted would give more conservative results.</p> <p>Details of the revised pedestrian generation are included in the Updated TIA.</p>

Comments	Responses
8. For Table 4.4, please take into account our above comments and update your assessed junction capacity in design year 2030.	Noted, and the analyses are revised in the Updated TIA.
9. According to Figure 3.1, a taxi/ car layby is provided at the vehicle ingress/ egress of the site. Please provide the relevant swept path analysis for the vehicular access, and demonstrate that it would not obstruct the vehicular access and/or leading to queueing on public roads.	<p>The relevant swept path analysis shown in Figure SP01 demonstrates that access to other vehicles will not be obstructed.</p> <p>In addition, the management office will closely monitor the operation of the loading / unloading area. If necessary, staff will be deployed to assist vehicle manoeuvring; hence, no queueing onto public road will be led.</p>
10. According to Figure 3.1 , it is noted that an existing overhead structure above the single deck tour bus layby will be demolished. Please ensure that minimum headroom of 3.8m could be provided for the layby after the alteration works, to ensure its compliance with the requirements of HKPSG.	Noted.
11. Please demonstrate that there would be sufficient passenger waiting area for the proposed coach layby on Beach Road while maintaining adequate width of footpath for passage of pedestrians.	<p>The number of coaches serving the proposed hotel with only 96 rooms is expected to be minimal.</p> <p>As part of the traffic management measure, coach passengers will be requested to wait at the hotel lobby and proceed to the layby only after the coach has arrived, hence, passengers will not be waiting on public footpath.</p> <p>For arriving passengers, they will be directed to proceed to the hotel lobby upon alight and not wait on the public footpath.</p>
12. Please indicate the remaining clear width of the footpath connecting the existing Repulse Bay Public Toilet and Beach Road.	<p>Although direct pedestrian access between Beach Road and the Repulse Bay Public Toilet has existed for many years, it is noted that this passage passes through private land, which forms part of the Subject Site. Nevertheless, the Developer is willing to continue to provide a minimum 1.5m passageway for use by the public and to improve safety for pedestrians, barriers will be placed near the coach layby.</p> <p>In view of the hotel having only 96 rooms, the number of coaches accessing the subject layby is expected minimal. Staff will be deployed to monitor the movement of coaches to ensure pedestrian safety.</p>

Comments	Responses
13. The applicant should propose and implement suitable traffic management measures for the coach layby on Beach Road to ensure vehicles would not tail back or affect the traffic on public road. In particular, the applicant should review the traffic management measures in the event that more than one single deck tour bus arrives at the layby at the same time.	Details on the proposed traffic management measures are presented in Chapter 3 of the Updated TIA.
<b>Comments from Transport Department (received on 13 March 2025) (Contact Person: Mr. Henry CHOW, Tel: 2829 5427)</b>	
1. The applicant should assess the traffic impact associated with the construction works for the proposed redevelopment. The applicant should also propose and implement suitable traffic management measures for the construction stage to mitigate the traffic impact.	<p>The Proposed Conversion will mainly involve alternation and addition work (A&amp;A works) within the Existing Development. Hence, construction traffic generation associated with the Proposed Conversion is expected to be negligible, says no more than 1 to 2 trips per hour. In addition, loading / unloading will also be carried out with the Subject Site. Hence, the Proposed Conversion will not result in adverse traffic impact during the construction stage.</p> <p>To further reduce the potential construction traffic impact, the applicant will strive to carry out delivery and loading / unloading during the off-peak period on weekday and Saturday morning, and avoid such activities on Saturday afternoon, all day Sundays and Public Holidays when Repulse Bay Beach is the busiest.</p> <p>For work to be determined involving public footpaths or carriageway, if any, temporary traffic arrangement will be prepared and submitted to TD and HKPF for review and approval during later design and construction stage.</p>
<b>Comments from Home Affairs Department (received on 13 March 2025) (Contact Person: Mr. Godwin KWONG, Tel: 2881 7016)</b>	
1. According to the Hotel and Guesthouse Accommodation Ordinance (Cap. 349) ("HAGAO"), "hotel" and "guesthouse" mean any premises whose occupier, proprietor or tenant holds out that, to the extent of his available accommodation, he will provide sleeping accommodation at a fee for any person presenting himself at the premises, unless all accommodation in the premises is provided for a period of 28 consecutive days or more for each letting which is exempted under the Hotel and Guesthouse Accommodation (Exclusion) Order (Cap. 349C).	Noted.

Comments	Responses
2. If the mode of operation falls within the definition of “hotel” or “guesthouse” under the HAGAO, a licence under the HAGAO must be obtained before operation.	Noted.
3. Under the HAGAO, hotel licence will only be issued for premises approved or accepted by the Building Authority (BA) for hotel use. The applicant should submit a copy of an occupation permit or acknowledgement letter for the completion of the A& A works issued by the BA for the proposed hotel when making an application under the HAGAO.	Noted.
4. The licensed area in one application must be physically connected and shall not be separated by other private occupancy or uses not connected with the operator’s business.	Noted.
5. Detailed licensing requirements will be formulated upon receipt of application under the HAGAO, if applicable.	Noted.

Compiled by: KTA  
Date: 15 May 2025