

**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 Environmental Protection Department (Contact Person: Ms. Flora NG, Tel: 2835 2319)</b>	
<u>Air Quality Impact Assessment (Annex D)</u>	
1. Table 4.1 – (a) Please supplement the blanks for annual RSP, annual FSP and annual NO <sub>2</sub> in 2020.	The annual RSP, annual FSP and annual NO <sub>2</sub> in 2020 have been supplemented. Table 4.1 is updated accordingly.
(b) Please clarify if 10th highest 8-hour ozone in 2023 and average exceeded AQO.	The 10 <sup>th</sup> highest 8-hour ozone in 2023 and average exceeded AQO. Table 4.1 is updated accordingly.
(c) Peak season ozone in 2023 exceeded AQO, please bold/underline the concentration that exceeded AQO.	Table 4.1 is updated accordingly.
2. Section 4.2 – Table 4.2 should be quoted instead of Table 5.2. Please revise.	Section 4.2 is updated accordingly.
3. Table 4.2 – PATH data for 2026 instead of 2027 are provided. Please revise.	Table 4.2 is is updated accordingly.
4. Section 4.3 – Please revise to “Tables 4.1 and 4.2”. There should be exceedances for ozone, please revise the paragraph	Section 4.3 is updated accordingly.
5. Table 5.1 – Please repeat the header row if the table spans across several pages.	Table 5.1 is updated accordingly.

Comments	Responses
6. Table 5.1 – Please use two different ASR ID for the two ASRs A51 of the proposed development.	The only ASR of the proposed Conversion is the fresh air intake location of the guest rooms at the roof floor, which is now assigned as A51. Table 5.1 is updated accordingly.
7. Section 5.2 – Please replace “Table 6.1” with “Table 5.1”.	Section 5.2 is updated accordingly.
8. Section 7.3 – Please confirm if the no. of dump truck and plants are per hour or per day.	It is estimated that maximum 2 – 3 plants per day and maximum 1 dump truck per hour during the construction period. Section 7.3 is updated accordingly.
9. Figure 2 and 3 – Please show the locations of the two ASR 51 on these figures The two ASRs of the proposed development should be represented by the nearest fresh air intake and/ or openable windows of the proposed development to the roads.	The only ASR of the proposed Conversion is the fresh air intake location of the guest rooms at the roof floor (A51), which is illustrated in Figure 3c. Figures 3a - 3c are updated accordingly.
<b>Waste Management Assessment (Annex G)</b>	
10. RtC 5 – Previous comment has not been duly addressed. Instead of removing ADV-19, it is suggested to clarify in the relevant section whether the Waste Management Plan will be submitted as part of the Environmental Management Plan to the Architect/Engineer for approval in accordance with ADV-19.	Waste Mangement Plan will be submitted to the Project Engineer / Architect / Authorized Persons for approval in accordance with ADV-19. Section 3.5 is added to reflect the above.
11. Section 3.5 – Previous comment has not been duly addressed. Please clarify whether the general refuse mentioned in Section 3.5 shall be categorized under the General Refuse in Section 3.7. If not, please elaborate the difference between them.	The relevant wording omitted in Section 3.6 (previously as Section 3.5).
<b>Comments from Transport Department (Contact Person: Mr. Henry CHOW, Tel: 2829 5427)</b>	
1. According to para. 2.19 of the TIA, manual count traffic surveys were conducted on 4 July 2025 and 6 July 2025. It is noted that T1 typhoon signal was hoisted on the survey days. Please demonstrate the traffic data is representative to the normal traffic situation. Besides, please advise any temporary traffic arrangement/control was being implemented in the vicinity during the surveyed period.	Additional traffic counts at Beach Road to the north of South Bay Path were conducted on Friday, 8 <sup>th</sup> August 2025 and Sunday, 10 <sup>th</sup> August 2025 to ascertain the traffic surveys conducted on 4 <sup>th</sup> July 2025 and 6 <sup>th</sup> July 2025. The weathers on both survey days in August were sunny and hot with no special weather warning, except for “ <i>Very Hot Weather Warning</i> .”

Comments	Responses
	<p>The peak hour traffic flows observed at Beach Road are found to be similar between July 2025 and August 2025. Hence, the Typhoon Signal No. 1 hoisted from 1220 hours on Friday, 4<sup>th</sup> July 2025 to 1420 hours on Sunday, 6<sup>th</sup> July 2025 had no significant effect on the traffic condition of Beach Road, and the observed peak hour traffic flows (of Friday, 4<sup>th</sup> July, and Sunday, 6<sup>th</sup> July 2025) adopted are considered representative.</p> <p>Details are summarised in the Revised TIA.</p> <p>In addition, no known temporary traffic arrangement / control was observed On the days of survey.</p>
<p>1. As stated in para 2.27 of the TIA, the maximum occupancy of the existing ancillary car park was 32 cars and 58 cars on weekdays and weekends respectively during the surveyed period. Please advise the total number of parking spaces available for use during the surveyed period.</p>	<p>On the survey days, the existing ancillary car park had 58 parking spaces in use. According to the Applicant, for a number of years, the ancillary car park has operated with 58 car parking spaces.</p>
<p>2. Please advise the maximum queue length or number of queuing vehicles for the existing carpark during peak hours and demonstrate that the proposed development would not lead to queueing of vehicles on Beach Road.</p>	<p>The existing car park entry drop bar is located at top of the ramp on UG/F. During the peak periods, it was observed that some 4 to 5 vehicles would queue along Beach Road momentarily.</p> <p>As part of the Proposed Conversion, the entry drop bar will be relocated to bottom of the ramp at B3/F. Hence, entering vehicles will not need to stop at UG/F, and the available queue storage within the development will be increased from some 25m, i.e. 4 vehicles, to some 170m, i.e. 28 vehicles, which is more than sufficient to ensure no vehicle tailback to Beach Road.</p>
<p>3. It is noted that the surveyed trip generation/attraction rate of the existing development in Table 3.4 is much less than the trip generation/attraction rate in Table 3.7 and Table 3.8. Please review and justify your adopted trip generation/attraction rate of the existing development in Table 3.7 and Table 3.8 for the subsequent traffic assessment.</p>	<p>Table 3.4, trip generation / attraction of the Existing Development, is re-numbered as Table 3.3, and are adopted in subsequent Tables 3.7 and 3.8 to estimate the future trip generation / attraction, and subsequently the traffic assessment presented in Chapter 4.</p> <p>Please refer to the Revised TIA for details.</p>
<p>4. For Table 4.3, it is noted that the residential site development at R.B.L. 1204 was not included in your assessment</p>	<p>It is noted that R.B.L. 1204 is a land sale site by the Government for residential use. However, as of September 2025, this site is yet to be listed</p>

Comments	Responses
	in Land's Department's Land Sale Programme. Thus, the completion of this development is uncertain and is excluded from the traffic assessment.
<p>5. Please advise your proposed measures to ensure the proposed development would not affect the traffic on Beach Road</p>	<p>At present, car park attendants operate the ancillary car park during the peak period on weekend and public holidays to minimize the traffic impact on Beach Road in related to the Existing Development ensuring smooth traffic flow. Upon completion of the Proposed Conversion, car park attendants will continue to operate the ancillary car park.</p> <p>In addition, the Applicant will publicise on the official website the recommended access route to the Proposed Conversion, which is to use South Bay Road and South Bay Path when arriving from the west. This measure aims to discourage vehicles from entering Beach Road from Repulse Bay Road (opposite 56 Repulse Bay Road), hence, reducing traffic flow along Beach Road (between its junctions with Repulse Bay Road and South Bay Path). All hotel patrons will be reminded to use the recommended access route.</p>
<p>6. Please advise the proposed safety measures to ensure that the maneuvering of vehicles using the taxi layby and/or loading/unloading bay at UG/F would not pose safety hazards to the ingress vehicles or pedestrians. In addition, please advise your proposed measures to ensure that the maneuvering movement of vehicles at UG/F would not obstruct the traffic using the vehicular access.</p>	<p>At present, car park attendants operate the ancillary car park during the peak period on weekend and public holidays to ensure traffic safety. Upon completion of the Proposed Conversion, car park attendants will continue to operate the ancillary car park. Hence, the operation of the proposed laybys and loading / unloading bays will be closely monitored by the management during the peak period, thus traffic and pedestrian safety can be ensured.</p> <p>In addition, the existing entry drop bar at UG/F will be relocated to B3/F, thus ingress vehicles will proceed to the down ramp directly without stopping, and will not obstruct the maneuvering of taxis and goods vehicle at UG/F.</p> <p>It should also be noted that goods vehicles are restricted from entering Beach Road between 1200 and 1900 hours on Saturday, and all day on Sunday and General Holidays, when Repulse Bay Beach is the busiest. Hence, no goods vehicles can serve the site during the busiest period.</p>

Comments	Responses
<b>Comments from Water Services Department (Contact Person: Mr. Terry Law, Tel: 2152 5737)</b>	
1. It is noted that there is a discrepancy in the number of hotel employees between WDA and SIA. Please check and revise your water demand assessment accordingly.	Noted and updated accordingly.
2. In the table of calculation of existing water demand in Appendix 5, Please revise your wordings in notes 1 & 2 to explain how you estimated the total water demand for restaurant and the unit water demand for toilet respectively.	Noted and updated accordingly.
3. In the table of calculation of future water demand in Appendix 5, please revise the wordings “Unit Flow Factor Freshwater” and “Unit Flow Factor Saltwater” to “Unit Freshwater Demand” and Unit Saltwater Demand” respectively, for clarify, and add a footnote to state the assumptions you made for these unit demands.	Noted and updated accordingly.

Compiled by: KTA

Date: 16 September 2025

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**Public Comments received during Statutory Public Consultation Period**

Summary of Major Grounds / Comments	Responses
<p><b><u>Traffic/Transport</u></b></p> <p>(i) Traffic Impact Assessment considered misleading because the summer survey was conducted on days with T1 Typhoon Signal.</p> <p>(ii) The TIA was underestimated because it was based on non-representative AADT stations.</p>	<p>(i) Although Typhoon Signal No. 1 was hoisted from 1220 hours on Friday, 4th July 2025 to 1420 hours on Sunday, 6th July 2025, there was no other special weather warning, except for “Very Hot Weather Warning” on both survey days, i.e, Friday 4th July and Sunday 6th July 2025. No rainfall was recorded on both survey days, and the Repulse Bay Beach remained opened and no red flag was hoisted by the Leisure and Cultural Services Department.</p> <p>To ascertain if the observed traffic flows on these 2 days are representative, additional traffic counts at Beach Road to the north of South Bay Path were conducted on Friday, 8th August and Sunday, 10th August 2025. The weather on these 2 survey days was also sunny and hot with no special weather warning, except for “Very Hot Weather Warning.”</p> <p>The comparison found that the peak hour traffic flows observed at Beach Road in July 2025 are marginally higher than to those of August 2025; hence, the hoisting of Typhoon Signal No. 1 had no significant effect on the traffic condition of Beach Road.</p> <p>(ii) The ATC stations reviewed are located in the Repulse Bay region, and along the access routes of Repulse Bay Beach and the Subject Site.</p> <p>It is noted the ATC shows Beach Road has a higher traffic growth than other ATC stations along Repulse Bay Road, but its AADT is also much</p>

Summary of Major Grounds / Comments	Responses
<p>(iii) There is no provision of refuse collection vehicle bay, which will affect pedestrian circulation and lead to nuisance to the neighborhood.</p> <p>(iv) The applicant is urged to provide sufficient pedestrian facilities including minimum 4.5-wide footpaths and designated pedestrian crossings.</p> <p>(v) There is no swept path analysis for HGV/LGV, and the location of taxi/ car layby will pose traffic safety issue.</p>	<p>lower. Hence, a weighted average annual growth rate is considered more appropriate to estimate the future traffic flow for the overall road network, which is +0.9% per annum. However, to be conservative, the Revised TIA adopted an annual growth rate of 2% per annum to estimate the future traffic flow.</p> <p>(iii) The existing development does not provide loading / unloading bay designated for refuse collection vehicle, but utilise the open-air layby for refuse collection. In addition, it is noted that the Hong Kong Planning Standard and Guideline does not require provision of loading / unloading bay for refuse collection vehicle.</p> <p>Nevertheless, upon completion of the Proposed Conversion, HGV loading / unloading bays will be provided within the building, where refuse collection can be conducted, which is a merit.</p> <p>(iv) Pedestrian impact assessments were conducted, and concluded the Proposed Conversion will not result in adverse pedestrian impact.</p> <p>(v) Swept path analyses for HGV and LGV are included in the TIA. Similar to existing condition, car park attendants will operate the ancillary car park during peak period to ensure traffic and pedestrian safety, and smooth traffic flow.</p>
<p><b><u>Sewerage, Drainage &amp; Water Supply</u></b></p> <p>(i) The SIA has not covered LG/F and assessed the cumulative impact on the existing sewerage network.</p>	<p>(i) The current proposal is only a partial conversion of an existing building. There will be no change to the F&amp;B facilities on LG/F and hence such portion was excluded from the comparison of sewerage flow (i.e. B1/F, UG/F &amp; 1/F). The comparison of sewerage flow in SIA, even based on a very conservative assumptions/approach, would still result in a slight reduction to the existing situation. Thus, it is safe and reasonable to conclude the cumulative sewerage impact to the existing sewerage network will be alleviated.</p>

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<p>(ii) No DIA has been carried out for the development. There have been extreme weather events in recent years, and the Repulse Bay area suffered from flooding. The current proposal has not demonstrated appropriate mitigation/ resilience measures to combat flooding and potential property damage for future guests and local residents.</p> <p>(iii) There are inconsistent assumptions in WDA and SIA.</p> <p>(iv) The use of a “unit flow factor” (UFF) for assessing freshwater and saltwater demand is misleading. The use of unit flow factor of school student for assessment could lead to underestimated results</p>	<p>(ii) The Pulse is an existing development on an already fully-paved land. The current proposal only involves addition &amp; alteration works to the existing building. As such, there will be no change to the runoff condition and hence no adverse drainage impact at all. DIA for conversion project is considered unnecessary.</p> <p>(iii) &amp; (v) Please note that WDA and SIA are two different technical assessment in terms of nature and methodology, and oversaw by two different Government departments, hence the adoption of different assumptions and factors. The assumptions and parameters adopted have been listed out explicitly and agreed with relevant authority. The assumptions adopted in WDA also make reference to WSD DI 1309.</p>
<p><b><u>Visual</u></b></p> <p>(i) The proposed central boiler room and A/C plant room on the rooftop of the building may result in significant visual impact. Also, there is no detail about the design, sizes, dimensions, headrooms, heights and operation hours of the facilities, raising concerns on the nuisance to nearby residents. The applicant should relocate these facilities to lower floors.</p>	<p>(i) The rooftop E&amp;M facilities are subject to various guidelines and ordinances. In terms of visual aspect, the JPN5 governs the height and size of the roof-top structures (including E&amp;M facilities), ensuring compliance with the building height restriction imposed. Relevant pollution control regulations and mitigation measures recommended in “Good practices” will also be complied with and followed such that the Proposed Conversion will not result in any adverse environmental impact nor causing nuisance to the nearby residents.</p> <p>Nonetheless, the provision of E&amp;M facilities will be further reviewed in the detailed design stage and subject to the consideration and approval of relevant authority in later stages.</p>

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