Attachment A

Responses-to-comments Table

	Departmental Comments	Responses to Comments
1.	**Comments from Environmental Protection Department received on 5.11.2025**	
	<u>Planning Statement</u>	
1.1	Please confirm and state in the planning statement that	
	(i) the fixed plants of the building will be properly designed and installed to satisfy the relevant noise criteria in the HKPSG and	Please be confirmed that fixed plants of the building will be properly designed and installed to satisfy the relevant noise criteria in the HKPSG. Please see the replacement pages of planning statement in **Attachment C** for reference.
	(ii) relevant EPD guidelines will be followed to minimize construction noise impacts.	Please be confirmed that relevant EPD guidelines will be followed to minimize construction noise impacts. Please see the replacement pages of planning statement in **Attachment C** for reference.
1.2	Please address potential air quality impact of the Proposed Development that	
	(i) relevant EPD guidelines will be followed to minimize construction air quality impact;	Please be confirmed that the construction works will comply with all relevant legislations and guidelines in all case and at all time. In particular, relevant practices will be adopted so as to minimise the air quality impact arising from the construction phase, including:- 1. Good site management: high standards of housekeeping to prevent emissions of fugitive dust would be maintained to minimise the release of visible dust emission, such as cleaning, repair and maintenance of all plant facilities within the work areas should be carried out in a manner minimising generation of fugitive dust emissions 2. Careful debris handling: debris to be covered entirely by impervious sheeting or stored in a debris collection area sheltered on the top and the three sides 3. Wheel washing: to ensure every vehicle be washed to remove any dusty materials from its body and wheels With strictly compliance of relevant control requirements stipulated under the legislation and standard guidelines, no adverse air quality impacts are anticipated during the construction phase.

	Departmental Comments	Responses to Comments
	(ii) central air-conditioning will be provided and no openable windows within the buffer zone;	Please be confirmed that central air-conditioning system will be equipped in the proposed development and no openable windows will be provided within the buffer zone. The fresh air intake point of the air-conditioning system and recreational uses in open space will meet the buffer distance requirement in HKPSG.
	(iii) whether there is any chimney within 200m from the site boundary and their potential air quality impact; and	Desktop study has revealed that no industrial chimney located within 200m assessment area. Site survey is being conducted to validate the findings. It will be submitted separately in forthcoming Further Information for review at the soonest.
	(iv) whether there is any odour impact.	The Proposed Development is located in industrial area that is mainly occupied by commercial uses. The Chai Wan Park is located to the east and residential buildings are located to the west with about 25m and 50m respectively. Desktop study has revealed that no potential odour source is identified within the assessment area. Odour survey is being conducted to validate the findings. It will be submitted separately in forthcoming Further Information for review at the soonest.
2.	**Comments from Transport Department received on 6.11.2025**	
	Appendix A – TIA Report <u>Section 2 – Existing Situation</u>	
2.1	Para. 2.3 and Figure 2.1 – please indicate the proposed Area of Influence.	The area of Influence has been indicated in Figure 2.1 of the revised Traffic Impact Assessment (TIA) in **Attachment B1**.
2.2	Para. 2.7 on Public Transport Facilities – the impact to be brought by the development, as well as any enhancement and improvement of existing public transport facilities required, shall be assessed and reported in the relevant Section of the report.	The potential impact to public transport service has been accessed and the findings has shown that passengers generated by the Proposed Hotel would have negligible impact. Hence, no enhancement or improvement of existing public transport facilities is required. For details of the public transport assessment, please refer to the Paragraph 5.12 and 5.13 of the revised TIA in **Attachment B1**.

<table>
<tr><th></th><th>Departmental Comments</th><th>Responses to Comments</th></tr>
<tr><td></td><td><u>Section 4 – Traffic Impact</u></td><td></td></tr>
<tr><td>2.3</td><td>Paras. 4.2 and 4.11 – please clarify whether the base of the traffic forecast.</td><td>A comparison of 2 methods (Method 1 – BDTM, and Method 2 – Growth Factor) used to produce the 2033 traffic flows for junction capacity analysis (major roads located in the vicinity) are presented in Table 1 below.

Table 1 Comparison of Year 2033 Traffic Flow
<table><tr><th rowspan="3">Road Link</th><th rowspan="3"></th><th colspan="4">Year 2033 without Proposed Hotel</th><th rowspan="2" colspan="2">Comparison ([b] – [a])/ [a]</th></tr><tr><th colspan="2">Method 1 – BDTM (pcu / hour) [a]</th><th colspan="2">Method 2 - Growth Factor (pcu / hour) [b]</th></tr><tr><th>AM Peak</th><th>PM Peak</th><th>AM Peak</th><th>PM Peak</th><th>AM Peak</th><th>PM Peak</th></tr><tr><td rowspan="3">Island Eastern Corridor</td><td>NB</td><td>888</td><td>870</td><td>820</td><td>783</td><td>-8%</td><td>-10%</td></tr><tr><td>SB</td><td>1,483</td><td>1,287</td><td>1,390</td><td>1,217</td><td>-6%</td><td>-5%</td></tr><tr><td>2-way</td><td>2,371</td><td>2,157</td><td>2,210</td><td>2,000</td><td>-7%</td><td>-7%</td></tr><tr><td rowspan="3">Chai Wan Road (West of J7)</td><td>EB</td><td>1,272</td><td>1,005</td><td>1,271</td><td>1,008</td><td>0%</td><td>0%</td></tr><tr><td>WB</td><td>424</td><td>279</td><td>413</td><td>272</td><td>-3%</td><td>-3%</td></tr><tr><td>2-way</td><td>1,696</td><td>1,284</td><td>1,684</td><td>1,280</td><td>-1%</td><td>0%</td></tr><tr><td rowspan="3">Chai Wan Road (East of J7)</td><td>EB</td><td>1,124</td><td>1,055</td><td>1,068</td><td>980</td><td>-5%</td><td>-7%</td></tr><tr><td>WB</td><td>1,040</td><td>937</td><td>949</td><td>869</td><td>-9%</td><td>-7%</td></tr><tr><td>2-way</td><td>2,164</td><td>1,992</td><td>2,017</td><td>1,849</td><td>-7%</td><td>-7%</td></tr></table>
Table 1 shows that Year 2033 traffic flows for Island Eastern Corridor and Chai Wan Road (East of J7) are 7% lower if Method 2 is used, compared to Method 1. As for Chai Wan Road (West of J7), Method 2 will produce similar traffic flows as Method 1.

The above concludes that Method 1 (BDTM) adopted in the TIA, produces overall higher traffic flows, i.e., more conservative and is acceptable.</td></tr>
<tr><td>2.4</td><td>Para. 4.8 and Table 4.3 – the development at Wah Ha Estate was already completed. Please update the table accordingly.</td><td>Noted. Table 4.3 and Figure 4.1 of the revised TIA in Attachment B1 have been updated accordingly.</td></tr>
<tr><td>2.5</td><td>Para. 4.8 and Table 4.3 on Additional Planned / Committed Developments near the Subject Site – Housing development and Cheung Man Road should be included for assessment.</td><td>Noted. Table 4.3 and Figure 4.1 of the revised TIA in Attachment B1 have been updated accordingly.</td></tr>
</table>

	Departmental Comments	Responses to Comments
2.6	Para. 4.13 – please revise the section accordingly, after addressing our comments nos. 2.3 to 2.5 above.	The Year 2033 traffic flows and junction capacity analysis have been updated to incorporate the abovementioned updated list of planned and committed developments near the Subject Site. Please refer to the updated Figures 4.2 and 4.3 and Table 4.5 of the revised TIA in **Attachment B1** for consideration.
2.7	Junction improvements works at Chai Wan Road Roundabout will be carried out by CEDD under CE 63/2022 (CE) Site Formation and Infrastructure Works for Public Housing Development near Chai Wan Swimming Pool, Chai Wan. We understand that the aforesaid works will be completed before year 2033. Please consider to incorporate the aforesaid works in your assessment of traffic impact. <u>Section 5 – Pedestrian Impact</u>	The Gazetted Improvement at Junction of Chai Wan Road Roundabout has been incorporated into the traffic impact assessment. Please refer to Paragraphs 4.15 to 4.17 of the revised TIA in **Attachment B1** for the discussion and analysis of the junction improvements works.
2.8	Para. 5.1 and Table 5.1 – please elaborate how to derive the pedestrian generation rate by referring "in-house pedestrian generation rates" with detailed explanations/breakdown on your said in-house rates.	Pedestrian generation rates are from surveys conducted in November 2024 for 4 hotels and 2 industrial buildings. These buildings are of similar class, scale and traffic characteristics, i.e. proximity to the MTR station and road-based public transport services. <u>The surveyed hotels include the following:</u> (i) Nina Hotel Kowloon East at 38 Chong Yip Street, Kwun Tong (ii) Tuen Mun Pentahotel at 6 Tsun Wen Road, Tuen Mun (iii) Dorsett Kwun Tong at 84 Hung To Road, Kwun Tong (iv) Hotel Cozi Harbour View at 163 Wai Yip Sreet, Kwun Tong <u>The surveyed industrial buildings include the following:</u> (i) Tungtex Building at 203 Wai Yip Street, Kwun Tong (ii) Li Fung Tower at 868-888 Cheung Sha Wan Road, Lai Chi Kok The pedestrian generation rates of the surveyed hotels and industrial buildings are presented in Tables 2 and 3 below.

<table>
<tr><th></th><th>Departmental Comments</th><th>Responses to Comments</th></tr>
<tr><td>2.8</td><td></td><td>
Table 2 Pedestrian Generation Rates of the Surveyed Hotels
<table>
<tr><th rowspan="3">Development</th><th rowspan="3">No. of rooms</th><th colspan="4">Pedestrian Generation Rates (ped / 15 min / room)</th></tr>
<tr><th colspan="2">AM Peak</th><th colspan="2">PM Peak</th></tr>
<tr><th>GEN</th><th>ATT</th><th>GEN</th><th>ATT</th></tr>
<tr><td>Nina Hotel Kowloon East</td><td>254</td><td>0.1732</td><td>0.0512</td><td>0.1772</td><td>0.1575</td></tr>
<tr><td>Tuen Mun Pentahotel</td><td>298</td><td>0.1174</td><td>0.0134</td><td>0.0805</td><td>0.1141</td></tr>
<tr><td>Dorsett Kwun Tong</td><td>360</td><td>0.1972</td><td>0.0444</td><td>0.0722</td><td>0.0750</td></tr>
<tr><td>Hotel Cozi Harbour View</td><td>598</td><td>0.0769</td><td>0.0318</td><td>0.0485</td><td>0.0401</td></tr>
<tr><td>Adopted pedestrian generation rate</td><td></td><td>0.1732</td><td>0.0512</td><td>0.1772</td><td>0.1575</td></tr>
</table>
Table 3 Pedestrian Generation Rates of the Surveyed Industrial Buildings
<table>
<tr><th rowspan="3">Development</th><th rowspan="3">GFA (m^2)</th><th colspan="4">Pedestrian Generation Rates (ped / 15 min / 100m^2 GFA)</th></tr>
<tr><th colspan="2">AM Peak</th><th colspan="2">PM Peak</th></tr>
<tr><th>GEN</th><th>ATT</th><th>GEN</th><th>ATT</th></tr>
<tr><td>Tungtex Building</td><td>9,900</td><td>0.0203</td><td>0.1220</td><td>0.1017</td><td>0.0102</td></tr>
<tr><td>Li Fung Tower</td><td>22,000</td><td>0.0500</td><td>0.3410</td><td>0.2820</td><td>0.0360</td></tr>
<tr><td>Adopted pedestrian generation rate</td><td></td><td>0.0500</td><td>0.3410</td><td>0.2820</td><td>0.0360</td></tr>
</table>
</td></tr>
<tr><td>2.9</td><td>Paras 5.10 and 5.11 – it is envisaged that a considerable portion of generated/attracted pedestrian would travel to/from the proposed development to/from Chai Wan MTR station. Please assess the pedestrian route and the corresponding pedestrian impact and assess the LOS of affected streets.

Figure 3.1 – Proposed Ground Floor Layout</td><td>Additional pedestrian survey has been conducted at footpath of Ning Foo Street Amenity Area on Tuesday, 18 November 2025. The pedestrian impact assessment has been revised and shown in Chapters 2 and 5 of the revised TIA in Attachment B1 for consideration.</td></tr>
<tr><td>2.10</td><td>The lay-bys of coach will be bound by walls in 2 or 3 directions. Please advise how will the pick-up/drop-off arrange and the pedestrian route to lift lobby for pick-up/drop-off of coaches.</td><td>The layout of the ground floor parking spaces and loading / unloading spaces has been revised. The revised proposed ground floor layout and the pedestrian route to lift lobby for pick-up / drop-up of coaches are shown in Figure 3.1 of the revised TIA in Attachment B1.</td></tr>
</table>

	Departmental Comments	Responses to Comments
2.11	Please show the vertical clearance of the double-deck parking spaces and provide the operational details of the proposed double-deck parking arrangement for reference.	Vertical clearance of the double-deck parking space is indicated in Figure 3.1 of the revised TIA in **Attachment B1**. Regular maintenance will be provided to ensure that the car parking system is always in good working condition. An operator will be deployed to operate the double-deck parking rack: 1. Control the double-deck parking rack to park / collect the car with reference to the supplier's advices as shown in **Attachment B2**. 2. Temporarily move in/out the private car at the lower deck when the car on upper-deck is to be parked / collected.
	<u>Appendix B – Swept Path Analysis</u>	
2.12	Swept paths of heavy goods vehicle (Figure No. SP2) and coach (Figure No. SP5) show that the vehicles would encroach onto the opposite lane during leaving. Please review.	The width of the run-in/out is revised to 7.3m (revised Figure 3.1 of revised TIA in **Attachment B1** refer). Swept path analysis results of heavy goods vehicle (Figure SP2 in Appendix B of revised TIA) and coach (Figure SP5 in Appendix B of revised TIA) show that both vehicles could enter and leave with ease.
	Planning Statement Para. 3.2.2 and Table 3.3 – proposed setback	
2.13	We notice that the applicant has proposed to set back the building line along Lee Chung Street by about 1.1m. It is noted that the proposed setback area would be within private lot and to be managed by the lot owner. We have no comment from traffic engineering/management viewpoint for the proposed setback arrangement.	Noted.