

Response to TD's Comment

Planning Application No. A/H3/450 for
Proposed Hotel at No. 381 & 383 Queen's Road West, Hong Kong

Traffic Impact Assessment Report

Response to Comment

Transport Department's Comment via email dated 25 August 2025	Responses to Comments
I refer to your email dated 6 August 2025 enclosing a draft TIA for the captioned planning application. We have the following preliminary comments from traffic engineering viewpoint:	
i) The applicant should address our previous comments in form of Response-to-Comment (R-to-C) table in addition to the TIA Report to facilitate our review.	Noted. Please refer to the previous response-to-TD's comment enclosed in the TIA report.
ii) The applicant have not yet clarified if there is any intention to integrate the site of Nos. 385 and 387 Queen's Road West with the captioned site for a combined hotel development, if affirmative, a holistic approach should be adopted in proposing the captioned development.	<p>Noted. For the time being, the applicant has no intention to integrate the site of Nos. 385-387 Queen's Road West with the captioned site for a combined hotel development.</p> <p>Please note that a new S16 application will be required if the site of Nos. 385-387 Queen's Road West is to be integrated with the subject site (Nos. 381 and 383 Queen's Road West) for a combined hotel development.</p>
iii) With reference to Table 2.3 of TIA Report, loading/unloading (L/UL) facilities would be required for the proposed development according to requirements set out in Hong Kong Planning Standards and Guidelines (HKPSG). Considering the genuine demand of daily L/UL activities arising from foreseeable operation of the proposed development (including refuse collection, delivery of goods, pick up and drop off of visitors, etc.) and the presence of no-stopping restriction (NSR) zone along the frontage of the proposed development, internal L/UL facilities should be provided within the subject site to cater for the operational demand from the proposed development as advised in Table 2.3 of TIA Report.	<p>Noted. The required car parking spaces and loading/ unloading bays for this proposed hotel development cannot be provided due to the site constraint detailed as stated in Section 2.4 of the TIA report.</p> <p>The target customers of this hotel are individual traveller and business guests and sightseeing tour will not be provided. Hence, the parking and loading/ unloading demands are low and nil parking space and loading/ unloading bay will be provided for this Site.</p>
iv) Figure 3.1 - Please clarify if the ingress route has taken into account the traffic from Western Harbour Crossing.	<p>Noted. Figure 3.1 and Table 3.2, 5.7 and 6.1 have been updated and all junctions from/to Western Harbour Crossing (including junction of Connaught Road West/ Eastern Street North/ Eastern Street [J6]) had been included in the assessment.</p> <p>The junction capacity assessment demonstrated that there is no capacity problem in the design year, except J6 during the PM peak due to increase in</p>

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	<p>background traffic but not the proposed hotel development in 2033 design year.</p> <p>5.3.4The contribution of the proposed hotel site development traffic is negligible (i.e. 8 pcu in the PM peak [0.18% of the total junction flow]) and the junction capacity (RC) of 8% for this junction J6 is unchanged between the reference and design scenarios.</p>
v) Table 3.5 - In general, loading/unloading at farside lane is undesirable for front seat passages of vehicle, in particular the passages of bus which can only pickup/drop on left side of the bus.	Noted. The pick-up/drop-off and loading/unloading activities are relatively low based on reference hotels. Minimal pick-up/drop-off and loading/unloading activities will be carried out at Chiu Kwong Street (nearside kerbside) instead of Queen's Road West.
vi) Table 4.1 - Please note that the AADT for year 2019 to 2023 might be affected by COVID-19 epidemic and other activities. Please review the appropriateness of adopting these data to assess the annual growth rate for the onward traffic forecasting.	Noted. It is understood the AADT from 2019 to 2022 may be affected by COVID-19 epidemic and other activities. Therefore, the AADT dataset from 2018 and 2023 are directly compared, and the overall growth rate from 2018 to 2023 is +0.67%. The annual growth rate of +0.67% is adopted for conservative analysis.
vii) Section 4.2.6 - Further to comment (vi) above, please critically review the annual growth rate.	Noted. After reviewing the growth rate from Annual Traffic Census, Average Annual Growth Rate of Total Population & Employment and Projections of Population Distribution 2023-2031, the population and employment would be decreasing in the area. An annual growth rate of +0.67% is adopted for future traffic forecast from 2025 to 2033 as conservative purpose.
viii) Table 4.5 - Please include the hotel development at Nos. 385 and 387 Queen's Road West.	Noted. The hotel development traffic at Nos. 385 and 387 Queen's Road West are included in Table 4.5.

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ix) Section 5.4.12 seems contradicted with Section 5.1.5 that the proposed hotel will generate and attract 15 pcus and 15 pcus during AM peak and PM peak respectively.	<p>Noted. The observed pick-up/ drop-off and loading/unloading demands at two reference hotels are relatively low as stated in 5.4.12.</p> <p>The reference hotel trip rates presented in Table 5.2 are compared with hotel trip rate from TPDM, and the highest trip rates are adopted for conservative analysis (trip rates from TPDM). Thus, there is no contradiction between section 5.1.5 and 5.4.12.</p>

**Proposed Hotel (44 Rooms) at
No. 381-383 Queen's Road West, Hong Kong**

(Planning Application No. A/H3/450: Departmental Comments as at 27.3.2025)

Response to Comments

Transport Department's comments via PlanD's email dated 31 March 2025	Response to Comments						
Further to my email below, please find TD's comments for your consideration:							
Below are the comments on the planning application from the traffic engineering viewpoint:							
<u>Planning Statement</u>							
Section 6.2.1, 6.3.1 and 7.5:							
<p>2. Internal transport facilities should be provided according to the Hong Kong Planning Standards and Guidelines (HKPSG). The applicant is required to review the loading / unloading and parking arrangement for the construction and operation of the hotel development and consider necessary measure to minimise the traffic impact to local roads and transport facilities during both construction and operation stages.</p> <p>Sound justification should be provided for nil provision of internal transport facilities, and traffic impact assessment (TIA) is required to demonstrate that the operational demand (such as loading / unloading activities for delivery of goods and pick-up / drop-off activities of hotel visitors) thus the potential traffic impact arising from the proposed hotel development without internal transport facilities will be acceptable.</p>			Noted. Based on the latest HKPSG, the required car parking and loading/unloading provisions for this Hotel are summarised below and the TIA report (Table 2.3).				
			Development	HKPSG's Requirement	Type	Parking/ L/UL requirement	Required Spaces/ Bay
			Hotel (44 rooms)	Parking Requirement	Private Car	1 car space per 100 rooms.	1
				Loading/ Unloading Requirement	Private Car	Lay-by for taxi and private cars: 2 bays for <299 rooms	2
					Bus	Lay-by for single-deck tour buses: 1 bay for <299 rooms	1
					Goods Vehicle	Loading/unloading bays for goods vehicles: 0.5-1 goods vehicle bay per 100 rooms.	1
			Retail (225.8m²)	Parking Requirement	Private Car	1 car space per 150 - 300m² GFA	1
Loading/ Unloading Requirement	Goods Vehicle	1 loading/ unloading bay for goods vehicles for every 800 to 1 200m², or part thereof, GFA		1			

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	<p>According to HKPSG's requirement, 2 private car parking spaces, 2 private car / taxi bays, 1 bus loading/ unloading bay and 2 goods vehicle loading/unloading bays should be provided for this hotel development with 44 rooms and retail facilities.</p> <p>However, the required car parking spaces and loading/ unloading bays for this proposed Hotel development cannot be provided due to the site constraint discussed in Section 2.2 to 2.4 of the TIA report.</p> <p>Based on surveyed reference hotels, the pick-up/drop-off and loading/unloading demand are relatively low (1pcu/hr during AM peak and 1pcu/hr during PM peak), it is considered that there is ample available kerb space at Chiu Kwong Street and Queen's Road West to cater for these minimal pick-up/drop-off and loading/unloading demands from the proposed hotel development (as detailed in Section 5.4 of the TIA report)</p>
<p>3. It is noted from PlanD's supplementary information that the site of Nos. 385 and 387 Queen's Road West, which abuts the subject site, is subject to (i) an approved set of building plans in 2009 for a proposed 30-storey hotel development with 48 hotel rooms and (ii) an approved s16 Planning Application No. A/H3/420 in 2014 for increasing the number of hotel rooms from 48 to 72, both with nil provision of internal transport facilities. Noting the same applicant of s16 Planning Application and the same land use between the two adjoining sites, the applicant should clarify if there is any intention to integrate the site of Nos. 385 and 387 Queen's Road West with the captioned site for a combined hotel development, and a holistic approach should be adopted in proposing the captioned development. The provision of internal transport facilities such as loading / unloading bay and drop-off area within the combined site, if affirmative, should be duly considered with an aim to minimising</p>	<p>Noted. For the time being, the applicant has no intention to integrate the site of Nos. 385-387 Queen's Road West with the captioned site for a combined hotel development.</p> <p>Please note that a new S16 application will be required if the site of Nos. 385-387 Queen's Road West is to be integrated with the subject site (Nos. 381 and 383 Queen's Road West) for a combined hotel development.</p>

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kerbside activities that would cause potential obstruction to pedestrian circulation and traffic flow at Queen's Road West and Water Street.	
Section 7.4.5 and 7.6.1:	
4. The application proposed surrender of site area in the form of setback of 0.5m along the site boundary at Queen's Road West for street widening and claimed for bonus concession of plot ratio and site coverage in return. In accordance with Buildings Department's Practice Notes for Authorized Persons, Registered Structural Engineers and Registered Geotechnical Engineers (PNAP) APP-108, Building (Planning) Regulations (B(P)R) 22(2) provides for additional plot ratio and site coverage in return for surrender for the purpose of street widening, and hence public passages intended for street widening shown on town plans or other street improvement plans would be considered in the context of B(P)R 22.	Noted.
5. From a traffic engineering viewpoint, the applicant should demonstrate the need and the benefit of the proposed surrender of site area for street widening viz. traffic assessment such as the Level-of-Service (LOS) assessment of footpath, which is not included in the submission.	<p>Noted. The detail traffic assessment is presented in Section 5.4 of the TIA report.</p> <p>According to TPDM's requirement (Chapter 3.4, Volume 2), the minimum desirable width of footpath is 2.0m. The existing Queen's Road West footpath at southern of the site is 1.5m wide which cannot meet the current Transport Department's design standard.</p> <p>The Applicant plans to setback their site by 0.5m for the provision of a 2m wide footpath as a planning gain for public and to fulfil TPDM's requirement. Please refer to Section 5.4 of the TIA report for details.</p>

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Appendix 5:	
6. The applicant proposed one lift at the hotel development. The applicant should advise the proposed arrangement for delivery of goods in the hotel where the only one lift will be shared among all building users including hotel staff and visitors. Adequate waiting space within the building for the lift should be provided and the applicant should ensure that pedestrian queue for the lift would not be adversely formed and affect footpath outside the hotel. The applicant should also advise any traffic management plan and contingency plan for scheduled maintenance and emergency maintenance of the lift that would be implemented to minimise the potential impact to the operation of the proposed hotel and adjoining public roads.	The comment is noted. It will be dealt with at the building plan stage.
7. To create an enjoyable walking environment, the applicant is encouraged to provide building canopies, including over public footpath(s), setback area and/or right-of-way(s) in accordance with the following where applicable:	

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(i) Chapter 8 of HKPSG provides for the provision of building canopies (i.e. para. 5.6.11) and for the subject of pedestrian planning be included in development studies and planning applications (para. 5.9.2);	Noted.
(ii) "Projections over Public Streets" stipulated in Lands Administration Office Practice Note 3/2020 (Design, Deposition and Height Clause under Lease); and/or	Noted.
(iii) Building Ordinances, in particular Building (Planning) Regulation 10 in Cap 123F regarding balconies and canopies over streets.	Noted.
8. Doors of the proposed development should not encroach onto the public roads or the setback area when they are opened.	Noted.
Welcome to let me know <u>your way forward</u> on the captioned planning application once ready.	