

RESPONSES TO COMMENTS TABLE



Section 16 Application for Proposed Minor Relaxation of Building Height Restriction for Proposed Hotel Development with Shop and Services at “Residential(A)” Zone and Area Shown as ‘Road’ at Nos. 9-19 (odds) Kam Wa Street, Shau Kei Wan

Response to Comments Table

No.	Comments Received	Our Responses
1.	<i>Comments from Environmental Protection Department received dated 15 May 2026</i>	
a	<p>Based on the information provided, the proposed hotel will not rely on openable window for natural ventilation. All planned fixed plants will be designed and installed to ensure the relevant fixed plant noise criteria under the Hong Kong Planning Standards and Guidelines (HKPSG) will be met. Environmental Protection Department (EPD) has provided technical comment on pre-enquiry application. In fact, most of our technical comments on the pre-submission have not been addressed in the current submission. Please find our observations as below:</p> <p><u>Planning Statement</u></p> <p>1. Section 6.2.9 - Please rectify the typo “Air Pollution Control (Fuel Restriction) Regulations” in line 4.</p>	Noted. The section has been revised accordingly.
b	<p><u>Air Quality Impact Assessment</u></p> <p>2. Section 5.6, RtC #3c(b) - The comment was not addressed. Please supplement if there was any odour complaint records for the identified odour sources in recent years.</p>	<p>The odour complaints record within the 200m study area has been supplemented in Appendix 3-1.</p> <p>A total of 294 air nuisance complaints were received within the 200m study area in the past 5 years (as of May 2026). Although details of the complaints were not disclosed, it is reasonable to assume that these complaints are related to the major odour sources in the vicinity, such as the market and the refuse collection point.</p> <p>Therefore, the survey results alone are not sufficient to confirm that the Kam Wa Street Wet Market and the Kam Wa Street Refuse Collection Point are</p>



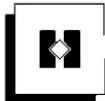
		not major odour sources during the operation of the Proposed Development. Sections 3.3.2, 5.2.4, 5.6 & 6.1.7 have been revised accordingly.
c	3. Section 6.1.2, RtC #3d - The comment was not addressed. Please rectify the typo "Air Pollution Control (Fuel Restriction) Regulations" in line 3.	Section 6.1.2 has been revised accordingly.
d	<u>Sewerage Impact Assessment</u> 4. For Section 2.4.2, it is noted that the typo re. manhole number FMH7093281 at Ming Un Lane is yet to be addressed.	Noted and Section 2.4.2 has been revised.
e	5. The applicant is advised to seek Drainage Services Department (DSD)'s view on the technical feasibility for proposed mitigation measure. Please provide a detailed Response to Comment (RtC) and highlight all changes in the next submission.	SIA is submitted to DSD and EPD for review and comments.
2.	<i>Comments from Food and Environmental Hygiene Department received dated 15 May 2026</i>	
f	Provided that the Transport Department (TD) has completed its review of all submissions from the Applicant and continues to hold the view that "the proposed run-in/out would pose danger to the two (2) affected licensed fixed-pitch hawkers", the Food and Environmental Hygiene Department (FEHD) has no objection in principle to make appropriate arrangements for the two (2) licensed fixed pitch hawkers, which may include, but is not limited to, permanent relocation. Furthermore, should the planning application and construction works be approved, the Applicant is required to submit all necessary documents as outlined in our previous comment (including a detailed construction	Noted with thanks.



	<p>works plan, schedule, approval from relevant Government departments for the proposed construction works, building plan(s) approved by the Buildings Department to illustrate the entrance(s), staircase discharge point(s) and vehicular run-in / out after the construction works completed, along with any other pertinent documents) for FEHD's consideration and must reserve sufficient time for this Department to initiate and execute the appropriate arrangement prior to the commencement of the proposed works.</p>	
g	<p>Please also find our comments on the Planning Assessment Report as follows.</p> <p><u>Comment on para. 3.6.7</u> "In general, hawking is highly regulated with no new hawker licenses issued since 1972. There are only two hawker licenses, one is itinerant hawker license which are non-transferable and the other is fixed-pitch hawker licenses which are only transferable between immediate family members." should be revised as "In general, hawking activity is highly regulated, and hawker licenses are no longer newly issued under normal circumstances. There are two types of hawker licences in Hong Kong, which are itinerant hawker licence and fixed-pitch hawker licence."</p>	<p>Noted. The paragraph has been revised accordingly.</p>
h	<p><u>Comment on para. 3.6.8</u> "Under the current Government policy, if a fixed-pitch hawker licensee dies, surrenders the licence or it is otherwise cancelled, an "immediate family member" (i.e. parent, spouse, son or daughter) may apply for succession or transfer, though in practice such applications for fixed pitch hawker licences are generally restricted to the spouse of the licensee." should be revised as "Under the</p>	<p>Noted. The paragraph has been revised accordingly.</p>



	<p>current Government policy, the application for succession to and transfer of hawker licences are also subject to strict restrictions. Generally, a fixed pitch hawker licence can only be succeeded to or transferred by the licensee's "immediate family members" (i.e. parents, spouse, son or daughter). All hawker licences issued on or after 21 May, 2010, including those issued by "succession" or "transfer", are not eligible for further succession or transfer."</p>	
i	<p><u>Comment on para. 7.6.2</u> Sentence 3 "It is well understood that the Food and Environmental Hygiene Department's (FEHD) policy is to ensure the safety of both the public and hawkers during operations." Should be revised as "It is well understood that the Food and Environmental Hygiene Department's (FEHD) policy is to ensure the safety of both the public and hawkers during operations."</p>	Noted. The paragraph has been revised accordingly.
j	<p><u>Comment on para. 7.6.3</u> Sentence 1 "The current strict hawker management policy may not favour the succession of hawker activities, and these affected hawkers may choose to surrender their licences." should be replaced by "Under the circumstance that the affected fixed pitch hawkers are regarded not appropriate to continue business at their original hawker pitches after completion of the construction works, FEHD will initiate the procedure to resite and allocate them with existing vacant pitches elsewhere permanently to maintain their livelihood."</p>	Noted. The paragraph has been revised accordingly.
3.	<i>Comments from Drainage Services Department received dated 20 May 2026</i>	
a	<p>Please find the following comments on the submitted Sewerage Impact Assessment (SIA):</p> <p>Appendix 2-1: s for the following names, please revise.</p>	Noted. Appendix 2-1 has been revised.



	<ul style="list-style-type: none"> • “Fong Shui Chuen Service Building” should read as “Fong Shu Chuen Services Building”. • “Chuang’s Height” should read as “Chuang’s Heights”. • “Shau Kei Wan Street West” should read as “Shau Kei Wan Main Street East”. • “Tung Wai House” should read as “Tung Tai House”. “Kam Wa Sreet RCP” should read as “Kam Wa Street RCP”. 	
b	Para. 2.4.2: “FMH7093281” should read as “FMH7039281”.	Section 2.4.2 has been revised.
c	Appendix 2-1 and Appendix 2-3: Sewage flow from Mong Lung House (Catchment C) should be discharged to FMH7039277. Please update the design calculation.	Mong Lung House is assigned to Catchment A and the design calculation is updated. Appendices 2-1, 2-3, and Figures 2-1 to 2-3 have been updated accordingly.
d	Please advise why a new manhole is constructed for receiving sewage flow from the proposed development instead of discharging to the existing manhole FMH7039323.	<p>The sewage discharge configuration in this report follows the previously approved sewage discharge configuration (BD reference: BD 4/3009/19) for this Site, as stated in Sections 2.4.1 to 2.4.3.</p> <p>It is intended to make minimal changes to the approved sewage discharge configuration in this application.</p>
e	Based on the submitted SIA report, the Applicant is reminded to keep updated existing record with their latest design parameters, as well as the latest records from the surrounding for their consideration of the upgrading the surrounding sewerage system as necessary. The SIA for the subject planning application also needs to meet the full satisfaction of Environmental Protection Department (EPD), the planning authority of sewerage infrastructure.	Noted.
4.	<i>Comments from Transport Department received dated 20 May 2026</i>	
a	<u>Planning Assessment Report</u>	Noted. The paragraphs have been revised accordingly



	<p>1) Para. 5.5.1 and Para. 6.1.1 – Please note that for the section of Kam Wa Street between Mong Lung Street and Shau Kei Wan Main Street East, there are existing goods vehicle parking spaces at the southern side and a layby for Public Light Bus (PLB) stand cum part-time parking for PLB at the northern side (i.e frontage of the Application site) of the carriageway. Please review the statements accordingly.</p>													
<p>b</p>	<p>2) Para. 6.1.4 – According to the Traffic Impact Assessment (TIA) at Annex 2, the proposed hotel development would generate additional traffic over the residential development under the Approved GBP of the subject site. Please review.</p>	<p>Noted. The paragraph has been revised accordingly</p>												
<p>c</p>	<p>3) Para. 6.1.6 – Please review if the consultation with the public light bus and tramway operators has included Motor Transport Workers General Union (Public Light Bus Branch) [汽車交通 運輸業總工會(公共小巴分會)]. It seems that the consultation materials were not delivered to the concerned stakeholders.</p>	<p>The Motor Transport Workers General Union (Public Light Bus Branch) has been consulted and no objection has been received so far.</p> <p>The consultation with the public light bus and tramway operators are summarized as follow:</p> <table border="1" data-bbox="1070 887 2040 1319"> <thead> <tr> <th data-bbox="1070 887 1556 954">Operator of Public Light Bus and Tram</th> <th data-bbox="1556 887 2040 954">Result</th> </tr> </thead> <tbody> <tr> <td data-bbox="1070 954 1556 1021">Hon Wah Public Light Bus Association Limited</td> <td data-bbox="1556 954 2040 1021">No objection.</td> </tr> <tr> <td data-bbox="1070 1021 1556 1123">Hong Kong, Kowloon & N.T. Public & Maxicab Light Bus Merchants' United Association</td> <td data-bbox="1556 1021 2040 1123">No objection.</td> </tr> <tr> <td data-bbox="1070 1123 1556 1190">Hong Kong Public & Maxicab Light Bus United</td> <td data-bbox="1556 1123 2040 1190">No objection.</td> </tr> <tr> <td data-bbox="1070 1190 1556 1257">Hong Kong Public Light Bus Owner & Driver Association</td> <td data-bbox="1556 1190 2040 1257">No objection.</td> </tr> <tr> <td data-bbox="1070 1257 1556 1319">Lam Tin Wai Hoi Public Light Bus Association</td> <td data-bbox="1556 1257 2040 1319">No objection.</td> </tr> </tbody> </table>	Operator of Public Light Bus and Tram	Result	Hon Wah Public Light Bus Association Limited	No objection.	Hong Kong, Kowloon & N.T. Public & Maxicab Light Bus Merchants' United Association	No objection.	Hong Kong Public & Maxicab Light Bus United	No objection.	Hong Kong Public Light Bus Owner & Driver Association	No objection.	Lam Tin Wai Hoi Public Light Bus Association	No objection.
Operator of Public Light Bus and Tram	Result													
Hon Wah Public Light Bus Association Limited	No objection.													
Hong Kong, Kowloon & N.T. Public & Maxicab Light Bus Merchants' United Association	No objection.													
Hong Kong Public & Maxicab Light Bus United	No objection.													
Hong Kong Public Light Bus Owner & Driver Association	No objection.													
Lam Tin Wai Hoi Public Light Bus Association	No objection.													



		Lei Yue Mun Ko Chiu Road Public Light Bus Merchants Association Limited	No objection.
		Motor Transport Workers General Union (Public Light Bus Branch)	No objection so far.
		Public Light Bus General Association	No objection.
		Tuen Mun Public Light Bus Association	No objection.
		Kowloon Fung Wong Public Light Bus Merchants & Worker's Association Ltd.	No objection.
		Taxi & P.L.B Concern Group	No objection.
d	4) We understand from the traffic consultant of the applicant that canopy over the public footpath at the frontage of the proposed building is being considered. If affirmative, please suitably reflect the proposed canopy in the planning statement/ TIA.	Noted with thanks. The proposed canopy has been added in the planning statement.	
e	<u>Annex 2 Traffic Impact Assessment</u> 5) Para. 2.1 and Para. 2.3- Similar to our comment no. 1, please review and revise the description for PLB stand/parking spaces accordingly.	Noted. The Paragraphs 2.1 and 2.3 in the revised Traffic Impact Assessment (the "revised TIA") are updated.	
f	6) Para. 2.5, Para 2.6 and Figure 2.1 - Area of Influence should be proposed for agreement in TIA. It shall generally cover the area from the subject site to the nearby major interchanges with trunk roads. For the proposed development, it shall be including, but not limited to, the junctions of Shau Kei Wan Road/ Chai Wan Road, Aldrich Street/ Po Man Street and Mong Lung Street/Tung Hei Road.	Noted. Please refer to updated Figure 2.1, Tables 2.1 and 4.9 in the revised TIA.	
g	7) Table 2.1 - Please review and indicate the exact figures for the RC of Junction J3 in the table.	Noted. Please refer to updated Table 2.1 in the revised TIA.	



h	8) Para. 3.2 and Para. 3.8 – Please review and consider the loading/unloading demand for the retail shop and how the loading/unloading demand for the retail shop should be addressed.	The loading / unloading activities related to the retail shop can be conducted using the loading / unloading bays provided within the Proposed Hotel.
i	9) Table 3.1 – It is noted that 4 nos. of parking spaces for private car, 3 nos. of taxi/private car lay-by and 4 nos. of loading/unloading bays for goods vehicles and coaches would be provided under the development to address the parking and L/UL demand arising from the development which is considered acceptable.	Noted.
j	10) Para. 3.3, Figures 3.1 and 3.2 – Please advise the waiting area for car lift and the pedestrian route from loading/unloading bays to lift lobby.	<p><u>Waiting Area for Car Lift</u> Generally, taxis only require a short time to pick-up/drop-off passengers, hence, vehicles could temporarily wait for the carlift using the unoccupied spaces / area on the Ground Floor.</p> <p><u>Pedestrian Route from loading / unloading bays to lift lobby</u> A canopy along the frontage of the Proposed Hotel is proposed, so that goods delivery from the loading bay to the hotel lobby is under the cover of the canopy.</p>
k	11) Para. 3.7 and Figure 3.1 – The proposed shared use of the bays between loading/unloading of goods vehicles and picking-up/dropping-off of coaches can only be achieved with proper management. In addition, stopping of a HGV or coach at the bay would encroach onto the turn-table and impede its function. Please advise the traffic management plan to address the issues.	<p>The turntable is designed for HGV / Coach to enter the shared-use space for HGV and Coach only.</p> <p>Figures SP3 – SP7 in the revised TIA report show that the vehicle can enter and leave the share-use space for LGV and mini-coach and carlift without using the turntable.</p> <p>In addition, a management staff will be deployed to guide the vehicles entering and leaving the Proposed Hotel to ensure the smooth manoeuvring within the Proposed Hotel.</p>
l	12) Table 4.3 – Some information in the table seems not accurate. For example, the address of Development D “257 A Kung Ngam Road” does not exist. Please review the accurate addresses, project titles (if available) and development parameters in the table for clarity.	Please refer to the updated Table 4.3 in the revised TIA.



m	13) Para. 4.4 and Table 4.7 - Please clarify whether the adopted trip rates have been compared with the standard trip rates in TPDM and explain the rationale on adopting the proposed trip rates.	To be conservative, the lower limit trip rates for residential use in TPDM are adopted. Please refer to revised Table 4.7 and 4.8 in the revised TIA.
n	14) Para. 4.16 - Please review if "Table 4.4" shall read "Table 4.8".	Noted. Please see updated Paragraph 4.16 in the revised TIA.
o	15) Para. 5.8 - The pedestrian flows from the nearby major planned developments should be taken into account in the assessment.	Noted. Please see the updated Chapter 5.0 in the revised TIA.
p	16) Figure 3.1 - It is noted that a vehicle access is proposed at Kam Wa Street. In the view that there is an existing layby at Kam Wa Street with narrow footpaths, please consider appropriate traffic improvement measures to avoid any illegal parking at the lay-by from affecting the vehicular access of the proposed development.	Traffic sign "Keep clear" is proposed fronting the run-in/out of the Proposed Hotel. Please see updated Figure 3.1 in the revised TIA.
q	17) Traffic impact during construction stage should be assessed and any necessary improvement schemes/proposed traffic management measures should be proposed. As MIC building technology would be adopted according to the planning statement, please also advise the anticipated size of the MIC unit and the delivery route and the size of the associated delivery vehicles.	The Construction Traffic Impact Assessment will be prepared during the design stage when the construction programme is available.