



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 Wah Street, Shau Kei Wan

Response to Public Comments Table

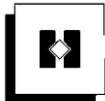
No.	Comments Received	Our Responses
1	In principle, we support the project’s potential to revitalise Kam Wah Street and stimulate the local economy. However, the roads in the Kam Wah Street area are narrow and already frequently affected by illegal parking and congestion on normal days. The additional traffic generated by the hotel, together with coach pick-up and drop-off activities, may inevitably exceed the transport capacity of the community. In this regard, we request that the applicant submit a detailed Traffic Impact Assessment and implement concrete mitigation measures, including the provision of designated pick-up and drop-off areas, rationalisation of nearby parking spaces, and the formulation of a vehicle access and management plan to ensure that residents’ daily mobility is not adversely affected.	Noted with thanks. Traffic Impact Assessment has been conducted to demonstrate that the proposed development would not result in any adverse impact on the surrounding road network. Designated lay-by and drop-off areas have been incorporated into the design to facilitate smooth vehicular and pedestrian circulation for residents.
2	A public consultation questionnaire survey is conducted. The consolidated views and recommendations are summarised as follows: • More than two-thirds of respondents consider the existing provision of hotels and service trades insufficient, while half consider the current range of retail shops adequate. • 58% of respondents consider, or are uncertain whether, the existing roads, traffic conditions, or other supporting facilities on Kam Wah Street can accommodate the proposed future development.	Noted with thanks. It is hope that by optimising land resources to meet the growing demand for hotel accommodation, the proposed development would create synergy with the existing tourism assets in Shau Kei Wan, positioning the area as a representative destination for heritage, cultural and eco-tourism. Given its excellent accessibility to public transport, the development would further contribute to strengthening the local economy of the Eastern District.



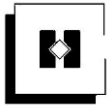
	71% of respondents support the proposed hotel, shop, and services development at Nos. 9-19 Kam Wah Street, Shau Kei Wan. Respondents support an increase in retail provision alongside corresponding supporting facilities, with a focus on daily-needs services, including transport infrastructure such as bus routes and traffic signals.	
3	The increase in pedestrian and vehicular traffic will place an additional burden on the community. Relaxation of the building height restriction will adversely affect natural ventilation. Increasing the building height will also impact the privacy of nearby residential occupants. Construction works may affect the structural integrity of adjoining buildings, disrupt the normal supply of water and electricity, and cause inconvenience to residents in terms of access and egress. It is recommended that the Urban Renewal Authority undertake a comprehensive planning and development approach by combining the subject site with the adjoining properties, namely Nos. 1-23 Kam Wah Street, for integrated redevelopment.	Traffic Impact Assessment and Visual Appraisal have been conducted to demonstrate that there is no adverse traffic impact to the surrounding road network and visual impact to the surrounding environment are anticipated from the Proposed Development. Mitigation measures to be implemented to minimize impact in the neighbourhood during the construction stage have been incorporated in the Planning Assessment Report and relevant technical assessments.
4	Application for minor relaxation of building height restrictions should demonstrate compliance with criteria as stated in the Explanatory Statement. Concerns have been raised regarding the potential excessive increase in development intensity.	The application site is not located in a predominantly residential neighbourhood, but within an established mixed commercial/residential area with active commercial activities along Kam Wa Street and Shau Kei Wan Main Street East. This position is supported by the site's planning history. Please refer to the Supplementary Planning Analysis in Appendix 8. When considering the planning application for minor relaxation of building height restriction, the proposed hotel development would enhance existing streetscape by providing canopy along the building frontage facing Kam Wa Street, active street frontage at G/F to maintain current street vibrancy and tree and shrub planting at various levels including a publicly accessible landscaped sky garden. Rather than building separation, the proposed hotel



		development would respect the existing wind corridor while providing better streetscape and walking environment for the community which also enhance visual permeability. The proposed hotel development would not result in any excessive increase in development intensity. The minor increase in building height is sought to facilitate the adoption of Modular Integrated Construction (MiC), which promotes green and innovative building practices in Hong Kong. The proposed development intensity is considered compatible with the surrounding context. Most nearby developments have a plot ratio of 8 or above, while the OZP Explanatory Statement recommends a building height band of 100mPD to 115mPD for the surrounding inland built-up area. Furthermore, a maximum non-domestic plot ratio of 15 is permissible within the “R(A)” zone in Shau Kei Wan. Against this background, the proposed hotel represents a logical extension of the established mixed commercial and residential character of Kam Wa Street and Shau Kei Wan Main Street East. The overall development intensity and building bulk are therefore not incompatible with the surrounding neighbourhood.
5	Concerns have been raised regarding the lack of convincing precedent from similar approved applications and affecting views of individual units	With regard to similar applications, it is noted that two previous applications (Nos. A/H9/70 and A/H9/71), proposing plot ratios of 15 and 13 respectively within the same planning scheme area, were rejected by the Town Planning Board in 2012 and 2013. However, these cases should not be applied mechanistically to the current application, as their circumstances were materially different and involved site-specific planning considerations. This is similarly the case for the approved applications at the subject site as mentioned in the public comment, which were assessed on their own individual merits. From a planning perspective, development proposals should be evaluated in a holistic manner, having regard to the overall planning context and



		public interest, rather than focusing solely on potential impacts to individual parties. While the proposed hotel development may result in some degree of sunlight obstruction to nearby residents, it would, on balance, enhance the local streetscape and increase greenery provision within the site. Appropriate mitigation measures will also be incorporated to minimise potential impacts on surrounding residents. More importantly, the proposed development complies with relevant statutory planning requirements and aligns with the direction set out in the 2025 Policy Address. Further details are provided in the Supplementary Planning Analysis at Appendix 8 .
6	There is concern of lacking attractiveness of Shau Kei Wan and on the Kernel Density Estimate analysis	As stated in our Planning Assessment report, the Kernel Density Estimate (KDE) analysis calculates the density/ concentration of attractions in the selected buffer area. A higher mean from KDE indicates there are more tourism resources within the selected buffer area. KDE analysis is not intended to equate raw density with tourism attractiveness in isolation. Rather, it statistically calculates and visualizes the spatial distribution and concentration of existing tourism-related tangible resources, including local attractions, historical heritage sites, and food culture. KDE is a non-parametric model that adopt the actual distribution of the identified resources, instead of a parametric model that attached to a pre-defined statistical distribution. KDE results assist to visualize market clustering, visitor demand patterns, and the potential for incubating local tourism. This methodology follows common planning practice for identifying emergent demand nodes and agglomeration benefits, which uses publicly available datasets without selective omission. Results of the analysis show that the density of these three resource categories around the Application Site is higher than the Hong Kong-wide average. While it is acknowledged that many established hotels cluster in traditional core areas, the analysis helps to highlight emerging and under-served clusters of tourism activity in proximity to the Application Site. By identifying the demand from tourism resources and the shortage of hotel

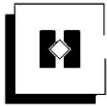


		accommodation in Shau Kei Wan, the KDE analysis supports the proposed development will contribute to a more balanced spatial distribution of tourism capacity in the future. Besides, the shops mentioned in the public comment are mostly neighbourhood-focus uses. However, as demonstrated in Section 4 of the Planning Assessment Report and the Supplementary Planning Analysis in Appendix 8, Shau Kei Wan district possesses abundant tourism resources, and Kam Wa Street, adjoining the Application Site, has long been established as a local tourist attraction. The current shop vacancy is considered a temporary market transition, rather than an indication of a lack of commercial or tourism viability in the area.
7	There is concern of insufficient justification for hotel demand.	Findings based on Hong Kong Tourism Board data indicate that hotel room occupancy rates in the Eastern and Southern districts have been raising, and are higher than those in Tsim Sha Tsui district recently, demonstrating a sustained demand for hotel accommodation in the area. Further details are provided in the Planning Assessment Report and Supplementary Planning Analysis in Appendix 8 .
8	There is concerned on potential impacts of the local hawker culture	The Applicant will continue to actively liaise with the Food and Environmental Hygiene Department on the arrangement for relocation of affected hawkers. To conserve and sustain the existing street vibrancy, retail uses will be provided at the ground floor of the proposed hotel development.
9	There is concern that the proposed hotel development may affect the health and welfare of the community.	Various technical assessments have been conducted to demonstrate that the proposed hotel development would not give rise to any adverse or insurmountable impacts in respect of traffic, air quality, noise, sewerage, or visual amenity. Where necessary, appropriate mitigation measures have been identified and incorporated into the proposal to minimise potential impacts and ensure compliance with relevant statutory requirements and prevailing standards, without compromising the health and well-being of the community.

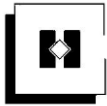


Response to Departmental Comments Table

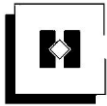
No.	Comments Received	Our Responses
1.	<i>Comments from Urban Design and Landscape, Planning Department received dated 27 May 2026</i>	
a	<u>Urban design and visual</u> The Site (about 518.41m²) is located at Kam Wah Street and adjacent to Shau Kei Wan Tram Terminus. The surrounding area is characterised by high-rise residential developments with permitted plot ratios (PRs) of 8 to 10. The proposed development intensity of PR of not more than 15 is much higher than the prevailing PR of the neighbouring residential developments. Judging from the photomontage of VP1, the increased development intensity has added to the visual bulk. Moreover, the photomontages with blank façade treatment have yet to demonstrate how the proposed design elements could soften the building bulk.	Relevant plans incorporating design merits have been included in the submission of further information. Additional design merits (i.e. art paintings on the building façade and canopy for shading) have been added to improve the overall pedestrian environment and to strengthen the distinctiveness of the Shau Kei Wan district. Please refer to Appendixes 7 and 8 for a more detailed analysis of the planning and design merits of the proposed hotel development.
2.	<i>Comments from Hong Kong District Planning Office, Planning Department received dated 27 May 2026</i>	
a	The application site is located within a predominantly residential neighbourhood with commercial uses mainly on the lower floors of the residential buildings. The proposed development intensity of PR 15 is much higher than that of adjacent residential developments with permitted PR of 8 to 10. In the Shau Kei Wan Planning Scheme Area, even commercial developments within “Other Specified Uses” annotated “Business” zone are subject to a maximum PR of 12. The proposed development with PR 15 is considered excessive and incompatible, in terms of development intensity and hence building bulk, with the surrounding residential developments. Similar hotel development applications (No. A/H9/70 and A/H9/71) within the same planning	Noted. Please refer to Appendix 8 for our Supplementary Planning Analysis.



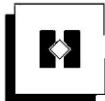
	scheme area were rejected in 2012 and 2013 respectively mainly on the ground that their PRs of 15 and 13 were deemed excessive relative to the surrounding residential developments with permitted PRs of 8 to 10 at the time. Approving the current proposal would set an undesirable precedent for similar hotel developments, with cumulative effects adversely affecting the general amenity of the area.	
b	According to the submitted elevation in the revised Indicative Architectural Drawings via supplementary information (SI) dated 23.4.2026, the floor-to-floor height (FTFH) of the G/F (5.25m) and 2/F (5.6m) which includes a transfer plate (1.5m) are higher than the usual FTFH for carparking floors. Please provide further justifications for the proposed two storeys of aboveground car park and their respective FTFHs, particularly explaining why LGV parking cannot be accommodated on G/F alongside the L/UL bays. Also, please clarify whether an additional transfer plate is required solely due to the adoption of the aboveground car park layout.	Two aboveground car park floors are required due to the constrained site footprint and the need to reserve 1/F for essential E&M plant. LGV spaces cannot be accommodated at G/F alongside the required taxi lay-by and vehicle maneuvering/turning provisions. The proposed FTFH at 2/F is necessary to accommodate the transfer plate for MiC above, an E&M zone, and the minimum headroom required for LGV parking, without excess height provision.
c	The current submission presents some design merits, please provide relevant drawing(s) for better illustration. Please consider incorporating additional building design and planning merits that would improve the townscape and the amenity of the locality.	Noted, relevant plans and drawings are incorporated in the submission of further information.
d	The proposed shop and service use is missing on the Ground Floor Plan in the revised Indicative Architectural Drawings via Supplementary Information dated 23.4.2026.	Noted with thanks.
e	Noted from the Planning Statement that the proposed communal sky garden on the 3/F will be provided for the enjoyment of the hotel guest. Please clarify whether the proposed open landscape garden on the same floor (refer	Subject to detail design and operation arrangement, the sky garden with landscape design at 3/F will be provided for enjoyment of the hotel guests and local community on designated opening hours.



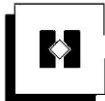
	to the revised Indicative Architectural Drawings via Supplementary Information dated 23.4.2026) is also for the use of hotel guests only.	
f	According to the applicant, the applicant would provide assistance to the affected licensed fixed pitch hawkers in coordinating with the Food and Environmental Hygiene Department (FEHD) to identify suitable alternative locations for relocation and settlement within the vicinity. Please specify the nature of this assistance. If hawker relocation cannot be arranged prior to commencement of construction, please detail the proposed construction access arrangements for the site.	A designated temporary construction access route (i.e. via existing or temporary ramps/entrances away from primary hawker pitches) will be used to segregate construction vehicles from hawker trading areas. This may include implementing one-way traffic flow, temporary traffic signals, or flagmen to control vehicle movements during peak hawker hours Measures including the following will also be implemented to ensure vehicular and pedestrian safety: • Restricted construction vehicle entry/exit times to avoid peak hawker trading periods where feasible • Provision of temporary footpaths or diversion routes to ensure continued public access to unaffected or partially affected hawkers. • Regular coordination meetings with hawkers and FEHD to adjust arrangements based on on-site conditions.
g	The non-domestic GFA for retail and hotel uses specified in Table 2-1 of the Sewerage Impact Assessment (P. 2) are different from that specified in Table 5 of the Planning Statement (P.34). Please clarify.	The non-domestic GFA for retail and hotel uses is about 50 sq.m while the remaining area is for hotel use.
h	While the appendices are marked as "Appendix" throughout the planning assessment report, the covering page of each individual appendix is marked as "Annex". Please rectify the discrepancy.	The discrepancy has been revised.
3.	<i>Comments from Environmental Protection Department received dated 15 June 2026</i>	
a	It is noted that applicant proposes to develop the subject site to a 31-storey hotel and anticipated to be completed by year 2031. Based on the information provided, the proposed hotel will not rely on openable window for natural ventilation. In view of the close proximity of fixed noise source of the proposed development to nearby NSR	Noted. Please refer to our responses below.



	(Noise Sensitive Receiver), the consultant may consider to relocate the fixed noise and list out all the proposed mitigation measures whether applicable or not. Please find our comments on the planning application as below for your follow-up action.	
b	<u>Planning Statement</u> Section 6.2.14 – Please re-write the section according to the latest Air Quality Impact Assessment (AQIA). Please include the mitigation measure for odour impact, e.g. locate the fresh air intake away from the odour sources, install air purifiers in the fresh air system to further reduce potential odour nuisance to users.	Noted. The paragraph has been revised accordingly.
c	<u>Appendix 3 - AQIA</u> Section 3.3.2 – Please delete this section as it should be discussed in Section 5.6 instead.	Section 3.3.2 has been removed. The information regarding the record of air nuisance complaints has been moved to Section 5.6 .
d	Section 3.7.11 – Please add section number.	Revised accordingly.
e	Section 5.2.4 – Please confirm and re-write this section to “No odour sources in Table 2-1 were identified within the 200m buffer zone. Odour impact from Kam Wa Street Market and Kam Wa Street Refuse Collection Point (RCP) is discussed in Section 5.6.”.	Section 5.2.4 has been revised accordingly.
f	Sections 5.6.3 and 5.6.4 – The total number of complaints represents all types of air nuisance within the 200m buffer area, which may be irrelevant to odour impact from Kam Wa Street Market and Kam Wa Street RCP. Please confirm if there is no information available specifically for odour complaint in relation to Kam Wa Street Market and Kam Wa Street RCP. Please re-write these sections if necessary.	It should be noted that potential odour impacts can vary depending on the surrounding environment, such as temperature. The survey results alone are not sufficient to confirm that the Kam Wa Street Wet Market and the Kam Wa Street RCP are not major odour sources during the operation of the Proposed Development. For a conservative assessment, it is assumed that some of the complaints are related to the Kam Wa Street Wet Market and the Kam Wa Street RCP. Therefore, potential odour impacts may arise from these sources.



		Section 5.6 has been revised accordingly.
g	Please highlight all changes in the next submission.	Noted and all changes have been highlighted in yellow.
h	<u>Appendix 4 – Noise Impact Assessment 1</u> Section 3.3.3 - The proposed development is facing Kam Wa Street, Expressway Island Eastern Corridor is located 130 meters away and should not be affecting the proposed development, the consultant should review the Area Sensitivity Rating (ASR) for this case.	Noted. The Area Sensitivity Rating (ASR) for this case has been revised to Category B. The noise criteria and Section 3.3 have been revised accordingly. Appendix 5-1 and Tables 5-1 & 5-2 have been revised accordingly.
i	Appendix 5.1 - There would be direct line of sight for NSR 03a and NSR 07a (only 5 meter away from the noise source), -5 dB(A) barrier correction should not be applied. The consultant is required to demonstrate the fixed plant noise impact could be mitigated and fully comply with the Hong Kong Planning Standards and Guidelines (HKPSG) standard. With knowing the close proximity of fixed noise source of proposed development to nearby NSR, the consultant may consider relocate the fixed noise source and/or implement enclosure as mitigation whenever necessary. The Consultant could refer to the Environmental Protection Department's website (https://www.noiseenm.epd.gov.hk/) and list out the proposed mitigation measures wherever applicable in the report.	The -5 dB(A) barrier correction for NSR 03a and NSR 07a have been removed in the current assessment. To minimize the fixed noise impact, noise mitigation measures such as enclosure, silencers and acoustic louvres will be adopted as far as practicable. However, considering the close proximity of the residential buildings to the north, west, and east, these noise mitigation measures may not be sufficient to fully mitigate the fixed plant noise. In case of the mitigation measures cannot provide sufficient noise reduction level to comply with the relevant standards, the planned fixed noise sources would be restricted to the southern façade at 20/F or above to provide considerable distance to the nearby NSRs. as stated in the revised Section 5.2.4 . Additional NSR09 is supplemented and relevant sections, Appendix 5-1 Figures 2-3 & 5-1 have been revised accordingly. The revised calculations (Table 5-2 & Appendix 5-1) show that the maximum allowable SWL shall be 92 dB(A) for daytime and evening time, and 82 dB(A) for night-time.
j	Section 3.2 - The proposed development is in close proximity to the tram station, the consultant should	Shau Kei Wan Tram Terminus is located at close proximity to the southern-east side of the Site. Noise from moving trams entering and/or leaving the



	demonstrate that no adverse noise impact from the tram station would be anticipated.	Shau Kei Wan Tram Terminus at close proximity may cause nuisance to users of the Proposed Development. Since the Proposed Development features a central mechanical ventilation system, no openable windows will be provided for ventilation purposes. Consequently, the criteria for these noise sources affecting the Proposed Development are not applicable. Therefore, no adverse noise impact from the tram terminus is anticipated. Sections 2.3, 5.1, 6.1.3 & Figure 2-1 have been revised accordingly.
4.	<i>Comments from Food and Environmental Hygiene Department received dated 18 June 2026</i>	
	It is noted that the applicant has proposed an aluminium canopy over public pavement at the frontage of the proposed development (R-to-C Table No.4(d) and G/F and 1/F Floor Plans of Appendix 1 refer). We wish to offer the preliminary comment as below: The proposed aluminium canopy at the frontage of the proposed development should have height clearance of not less than 2.5 m over the public pavement, and not overlapped with any existing hawker fixed pitches in front of the application site.	Noted. The proposed canopy is having height clearance of about 4.95 m over the footpath and it would not overlap with existing hawker fixed pitches in front of the Application Site.
5.	<i>Comments from Highways Department received dated 18 June 2026</i>	
	The applicant should seek comments from BD regarding the compliance of the proposed canopy under Building Ordinance.	Noted. The Applicant would adhere to the requirement on canopy over street under the Buildings Ordinance and would actively liaise with the Buildings Department for the compliance of the proposed canopy under Buildings Ordinance. The design shall be determined with Buildings Department in the detail design stage.
6.	<i>Comments from Transport Department received dated 18 June 2026</i>	



a	Response-to Comment 4a) - the description in Para. 5.5.1 of Revised Planning Statement "In particular, public light bus is allowed during specific periods of weekdays" is not clear as the lay-by serves as PLB stand during 7-9 am and 5-9 pm from Monday to Friday and allows parking of PLB at other times. Please review if this statement shall be deleted and the last sentence of this para. shall be read as "To respect the existing parking area PLB stand cum part-time parking lay-by and to minimize disturbance, the run-in/out has been positioned at the eastern end instead of the middle of existing parking the lay-by, such that a continuous parking area PLB stand cum part-time parking lay-by can be preserved.	Noted. The paragraph has been revised accordingly.
b	Response-to Comment 4b) - the statement in Para. 6.1.5 of Planning Statement "The Proposed Hotel is anticipated to generate lower traffic volumes with only 8 and 5 additional passenger car units..." is contradictory. Please review if the statement shall read "The Proposed Hotel is anticipated to generate lower traffic volumes with only 8 and 5 additional passenger car units...	Noted. The paragraph has been revised accordingly.