

Your Ref.: TBP/A/K11/249

Our Ref.: AA598/PD/H/R/004

6 February 2026

Secretary, Town Planning Board
15/F, North Point Government Offices
333 Java Road, North Point,
Hong Kong.

Dear Sirs,

**Proposed Redevelopment for Hotel Use at Nos. 20–24 Tai Yau Street, San Po Kong, Kowloon and
Minor Relaxation of Non-Building Area for the
“Other Specified Uses” Annotated “Business Zone” of Section 16 Planning Application for
Approved Tsz Wan Shan, Diamond Hill and San Po Kong Outline Zoning Plan No. S/K11/31
Application No. A/K11/249 – Response to Departmental and Public Comments**

With reference to the captioned application, we would like to submit herewith the response to Departmental and Public Comments:-

Departmental Comments received on 29 Jan 2026	Applicant's Response
1. Commissioner of Police	
The Police have no comment in principle, provided the project will not cause traffic congestion on Tai Yau Street, which is a principal thoroughfare in the San Po Kong area. Any queuing that leads to congestion would adversely affect public access and cause inconvenience to the public. As a result, it is suggested that measures may be considered to implement whenever queues form on Tai Yau Street, such as deploying staff to direct traffic away from the hotel, displaying signage or display boards indicating that the hotel car park is full and requesting drivers to depart promptly.	Noted. We confirm that staff will be arranged to direct traffic away from the hotel during daily operation and display signages or display boards indicating the car park is full and requesting drivers to depart promptly will be provided at prominent location.

2. Commissioner for Tourism	
The Tourism Commission welcomes initiatives that are conducive to the long term and sustainable development of the tourism industry in Hong Kong. For reference, as at January 2026, Hong Kong received almost 50 million visitors, of which over 23 million were overnight visitors, for the whole of 2025. Hotel occupancy rate was 87% in the first eleven months of 2025. To support and sustain the growing momentum of the tourism industry and maintain the city's attractiveness to visitors, a stable and sufficient supply of hotel rooms is very important. Therefore, we support the initiative which will provide new and more hotel rooms and facilities to offer additional accommodation options to our visitors and enhance the tourism offering of Hong Kong.	Noted.
3. Director of Food and Environmental Hygiene	
We have no comment on the application	Noted.
4. Chief Engineer/Construction, WSD	
We have no objection on the application.	Noted.
5. Director of Fire Services	
<p>We have no specific comment on the proposal subject to fire service installations and water supplies for firefighting being provided to the satisfaction of the Director of Fire Services. The applicant is also advise the followings:</p> <p>i. Detailed fire services requirements will be formulated upon receipt of a formal submission of STT/STW, general building plans or referral of application via relevant licensing authority. Furthermore, the EVA provision in the captioned work shall comply with the requirements as stipulated in Section 6, Part D of the Code of Practice for Fire Safety in Buildings 2011, which is administered by the Building Authority.</p>	Noted.

<p>ii. the applicant is also advised to observe publications titled "Standard Licensing Requirement for Hotel License" from Office of Licensing Authority under Home Affairs Department.</p>	
<p>6. Chief Office (Licensing Authority), Office of the Licensing Authority/HAD</p>	
<p>No objection to the application</p> <p>2. In the absence of details information, I have the following comments from the hotel and guesthouse licensing point view:</p> <p>(i.) The applicant should submit a copy of occupation permit or acknowledgement letter for the proposed hotel when making an application under the Hotel and Guesthouse Accommodation Ordinance (HAGAO), Cap 349.</p> <p>(ii.) The licensing requirements will be formulated after inspections by our Building Safety Unit and Fire Safety Team upon receipt of application under HAGAO.</p>	<p>Noted. The relevant documents requested will be submitted when making the license application.</p>
<p>7. Chief Architect/ASC, ArchSD</p>	
<p>2. Base on the information provided, it is noted that the proposed development mainly consists of 1 tower with an overall plot ratio (PR) of 12 and a building height (BH) of about 119.725mPD. Since the proposed PR and BH are both permitted under the current OZP, we have no comment from architectural and visual impact point of view, subject to PlanD's view.</p>	<p>Noted.</p>
<p>8. Chief Town Planner/Urban Design and Landscape, PlanD</p>	
<p>General Comments</p> <p><u>Urban Design and Visual</u></p> <p>a. The subject site (the Site) with an area of about 2,426.05m² is located within the San Po Kong Business</p>	<p>Noted.</p>

Area, and falls within the "Other Specified Uses" annotated "Business" zone prescribed with a maximum plot ratio (PR) of 12, building height (BH) restriction of 120mPD and non-building area (NBA) restriction of a minimum 3m wide abutting Tai Yau Street. The immediate surrounding is mainly characterised by existing mid-rise industrial buildings with existing BHs ranging from 35.8mPD to 123mPD. Since the proposed development with a BH of not more than 33 storeys (i.e. 119.725mPD) (including a three-storey podium, one storey of basement car park and one storey of refuge floor) and a maximum PR of 12.0 does not exceed the development restrictions as stipulated on the approved Tsz Wan Shan, Diamond Hill and San Po Kong Outline Zoning Plan (OZP) No. S/K11/31, the proposed development would unlikely induce significant adverse effects on the visual character of the surrounding townscape.

- b. As gathered from the submission, the proposed development incorporates a 3m-wide building setback along the southeastern boundary abutting Tai Yau Street for a 24-hour public passageway as per the NBA requirement of the subject OZP. The existing common staircases within the NBA, which are commonly used by the adjoining building, will be retained and subsequently demolished upon redevelopment of the adjoining building, after which the area will be used as a public passageway. A building setback of 2.043m wide is also proposed along the northwestern boundary abutting service lane for pedestrian use. A continuous canopy of 2.5m wide and 79.3m in length is proposed along the building frontage facing Tai Yau Street for pedestrian weather protection. Landscape treatments such as vertical greening on G/F and landscape gardens and planters on G/F, 1/F and R/F, etc. are also provided. The above design measures

<p>may promote visual interest and pedestrian comfort.</p> <p><u>Air Ventilation</u></p> <p>c. From air ventilation perspective, incorporation of the abovementioned NBA would reinforce the air path on Tai Yau Street. The linear canopy with a clear headroom of 6m would allow wind penetration above and beneath it. Although the existing common staircase would remain within the NBA until the adjoining building is redeveloped, no significant adverse impact on pedestrian wind environment is anticipated.</p> <p>d. Comments from our Landscape Unit, if any, will be provided under separate cover.</p>	
<p>9. District Land Officer/Kowloon East</p>	
<p>The applicant stie falls with New Kowloon Inland Lot (NKIL) Nos. 4735, 4736, 4737, 4738 and 4739 s.A, s.B & RP ("the Lots") which is subject to a lease term having been extended up to 30 June 2047. The Lots are all restricts to industrial purposes excluding offensive trades and are subject to, inter alia, a maximum height of 300ft (i.e. 91.44m) above principal datum, a 10 feet wide non-building area at the ground level with a minimum clear headroom of 15feet at the rear of the Lots for the purpose of parking, loading and unloading of motor vehicles. The proposes hotel development is in breach of the existing lease conditions.</p> <p>2. If the planning application is approved by the Town Planning Board, the owners of the Lots shall apply to Lands Department ("LandsD") for a lease modification of land exchange to implement the proposal. However, there is no guarantee that such application will be approved. Such application, if received, will be processed by LandsD in the capacity as a landlord and if the application is approved, it will be subject to such terms</p>	<p>Noted. The owners of the Lots will apply to LandsD for a lease modification of land exchange to implement the proposal after approval of this planning application.</p>

and conditions, including inter alia, payment of premium and administrative fee as may be imposed by LandsD.	
10. Director of Electrical and Mechanical Services	
We have no comment from our regulatory services perspective.	Noted.
11. Director of Environmental Protection	
<p>1. The Applicant proposes to develop a 33-storey hotel (including 1 level of basement for parking and E&M facilities, and 1 level of refuge floor) providing 1,260 guestrooms. Based on the SPS, insurmountable environmental impacts associated with the proposed hotel are not anticipated. The findings of the environmental assessments are summarized below:</p> <p><u>Noise Impact Assessment (NIA)</u></p> <p>2. The proposed hotel will provide central air conditioning for all noise sensitive uses and not relied on openable window for ventilation. Therefore, adverse noise impact on the proposed hotel is not anticipated. With the implementation of the recommended measures below, adverse fixed noise impact is not anticipated.</p> <ul style="list-style-type: none"> - All the noisy plants should be installed within plant room or with acoustic enclosure; - Proper selection of quiet plant aiming to reduce the tonality at noise sensitive receivers (NSRs); - Installation of silencer / acoustic enclosure / acoustic louvre for the exhaust of ventilation system; - Openings of ventilation systems should be located away from NSRs as far as practicable and oriented away from the NSRs; - Installation of absorptive noise barrier (with density of absorption material of 48kg/m³) for the aerator which would duly shield the engine and other noisy parts of the aerator as far as 	<p>Noted. All the revised assessment reports of Noise Impact Assessment (NIA), Air Quality Impact Assessment (AQIA), Sewerage Impact Assessment (SIA) and Contamination Assessment Plan (CAP) will be submitted both in hard and soft copies..</p>

practicable, and;

- Provide suitable at source noise control measures with reference to EPD's "Good Practices on Ventilation System Noise Control" and "Good Practices on Pumping System Noise Control" such as silencers and acoustic linings when necessary.

Air Quality Impact Assessment (AQIA)

3. The minimum separation distance between the proposed hotel and the nearest road kerbs of Tai Yau Street (Local Distributor >5m) have satisfied relevant vehicular emission buffer distances as stipulated in HKPSG. Also, based on desktop study and site survey conducted on 8 July 2025, no chimney emission and odour emission sources are identified within 200m from the proposed hotel. In this connection, adverse air quality impact is not anticipated.

Sewerage Impact Assessment (SIA)

4. Based on the findings of SIA, the existing sewerage system would not be sufficient to cater for the sewerage generation from the proposed hotel. Therefore, the upgrading works will be proposed to enhance system capacity. With the proposed upgrading works, adverse sewage impact is not anticipated. However, we have some comments on the SIA in Annex 1 to be addressed by the applicant.

Contamination Assessment Plan (CAP)

5. Due to insufficient information and inaccessible for some location (i.e. the transformer room and underground pipelines) at current stage, a follow up site re-appraisal as well as remediation works (if required) are necessary to fully address the potential land contamination impact in the next stage. That said, insurmountable land contamination impact is not anticipated. We have

some comments on the CAP in Annex 1 to be addressed by the applicant.

6. On the above basis, we have no objection to the subject application from the environmental planning perspective. To address the comments on land contamination and sewage aspects as well as to ensure implementation of suitable mitigation measures, we recommend to impose the following planning approval conditions if the TPB decides to approve the application:

- (i.) the submission of a revised Sewerage Impact Assessment (SIA) for the proposed development to the satisfaction of the Director of Environmental Protection and Director of Drainage Services or of the Town Planning Board
- (ii.) the implementation of sewerage works proposed in the SIA to the satisfaction of the Director of Drainage Services or of the Town Planning Board; and
- (iii.) the submission of land contamination assessments in accordance with the prevailing guidelines and the implementation of the remediation measures identified therein prior to development of the site to the satisfaction of the Director of Environmental Protection or of the Town Planning Board.

7. Moreover, please include the following advisory clauses in the forthcoming MPC Paper for the captioned application:

- i. The Applicant is advised to minimise the generation of Construction and Demolition (C&D) materials; reuse and recycle the C&D materials on-site as

far as possible; and observe and comply with the legislative requirements and prevailing guidelines on proper waste management for the proposed development; and

- ii. The Applicant is advised to observe the relevant requirements under the Air Pollution Control Ordinance and Waste Disposal Ordinance for asbestos control prior to demolition of the existing buildings.

Annex 1

Contamination Assessment Plan

1. Response to Comment (2): Please advise whether the buildings (current and previous conditions) have other below ground level structure/space/room other than "the underground storage area at 20 Tai Yau Street" and "underground fuel tanks and its associated pipelines at 22-24 Tai Yau Street". If there is such structure/space/room, please provide the details of the structure/space/room and confirm whether it will cause potential land contamination.
2. Response to Comment (3):
 - a. The comment was not yet duly addressed. Please provide up-to-date information for Table 2.1 and Section 2.2, particularly for the latest result of (1) registered chemical waste producers records and (2) historical records of chemical spillage / leakage.
 - b. Table 2.1: Please check and advise what " / " means.
3. Response to Comment (5): According to the responses from Consultant "PCBs will not be tested for Boiler Rooms", please explain the reason of not including PCBs in the testing.

Besides, please confirm, with supporting justification, whether any chemicals containing PCBs were used in the boiler rooms.

4. Appendix G:

- a. Please check and revise the typo of "Methyltert-Butyl Ether" to be "Methyl tert-Butyl Ether".
- b. For soil, please check the remark for " *** " and revise it as " *** indicates that the C_{sat} value exceeds the 'ceiling limit' therefore the RBRG applies ".

5. Table 2.2 and Section 2.2: Please check whether the some content of the table and some content of the paragraph are missing

Sewerage Impact Assessment (SIA)

Appendix E – Hydraulic Capacity of Proposed Sewers at Proposed Hotel Development at 20-24 Tai Yau Street with Mitigation Measures

The previous comment has not been fully addressed: Please review if the remarks should be "B1-B11" instead of "B1-B12" in the file "A_K11_249_Appendix VII_SIA_Report".

It is noted that some of the invert levels are adjusted as per DSD's comments dated 26 Sep 2025, where the proposed invert levels of sewer sections FWD4048172 & FWD4048173 are lower than the invert levels of the existing downstream sewer section FWD4048174. Please confirm with DSD if such arrangement is acceptable.

General

Please re-visit the assessment based on above comments.

<p>Please note that the implementation of sewerage works shall also meet the satisfaction of DSD.</p> <p>Please provide softcopy of the report (in pdf) and calculation spreadsheet (in Excel spreadsheet) as well as all Response to Comments from EPD and DSD as appendix. Please also highlight the revised / updated content of the SIA report in next submission to facilitate review.</p>	
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Departmental Comments received on 30 Jan 2026	Applicant's Response
1. Chief Town Planner/Urban Design and Landscape, PlanD	
<p>We have no adverse comments on the planning application from landscape planning perspective. Our detailed comments are as follows:</p> <p>(a) The Site is situated in an area of commercial urban landscapes. There is no existing tree within the site; and</p> <p>(b) as shown on the Landscape Plan, landscape plantings are proposed on G/F, 1/F and R/F, no adverse landscape impact arising from the proposed development is anticipated.</p>	Noted.
2. Chief Highway Engineer, Kowloon, HyD	
<p>No comment on the application</p> <p><u>Other Detailed Comments:</u></p> <p>As the setback area and 24-hour public passageway with the lot boundary will be managed and maintained by the applicant, this Office has no adverse comment on the proposal from highway maintenance point of view. The design of the proposed setback area shall be submitted for relevant departments for comment.</p>	Noted.

3. Chief Engineer/Mainland South, DSD	
We have no comments on the captioned planning application from drainage operation and maintenance point of view.	Noted.
4. Commissioner for Transport	
<p><u>General Comment</u></p> <p>a) The swept path analysis indicates that the maneuvering path for long vehicles is very tight and it requires moving forward/ backward multiple times for parking and leaving the site. Please review the parking layout.</p> <p>b) Please indicate the headroom for ground floor and basement B1 floor in the architectural drawings.</p> <p><u>Road widening works at Tai Yau Street</u></p> <p>d) The proposed 3m-wide NBA from the lot boundary abutting Tai Yau Street ties in with the proposed traffic improvement works in San Po Kong requiring setbacks from public roads for future road widening and the air ventilation purpose. Since the road widening works are subject to the setback of other sites along Tai Yau Street, no road widening work is under planning for the time being.</p>	<p>We previously explored the use of a turntable to facilitate parking for heavy goods vehicles and coaches. Unfortunately, due to the limited space within the subject site, the turntable could not be effectively utilized. In particular, when a coach is positioned over the turntable, the system becomes inoperable. As a result, we have decided not to adopt the turntable option. (Please refer to the attachment Appendix 1 – FIGURE T-1). The swept path analysis we provided has already minimized the number of turning movements required within the subject site. In addition, experienced traffic controllers will be deployed to assist with vehicle parking and manoeuvring when entering and exiting the subject site.</p> <p>Noted. The architectural drawings have been updated to clearly indicate the clear headroom of ground floor and basement B1. Please refer to the attachment – the ground floor plan in drawing no. GBP-02 (Rev.B) and basement floor plan in drawing no. GBP-01 (Rev.B).</p> <p>Noted.</p>

e) The applicant is required to provide the design of the proposed setback area for agreement by government departments.	Noted. We confirm that this setback area will be dedicated for public passage on a 24-hour basis and will be designed to align with the street level to provide weather protection, enhance pedestrian comfort and ensure barrier-free access. We will ensure the paving and design details satisfy HK statutory standards which will be acceptable by Government Departments.
f) The applicant is reminded to note that any column to be constructed for the canopy should not induced negative impact to the pedestrian flow.	Noted.
g) The proposed canopy shall be managed and maintained by the lot owner	Noted. We confirm the proposed canopy will be managed and maintained by the lot owner.

Departmental Comments received on 4 Feb 2026	Applicant's Response
1. Chief Building Surveyor/Kowloon, BD	
<p>No objection in principle to the application subject to the following comments</p> <p>1. Paragraph 7(f)(1) of your memo under reference no. A/K11/249 refers. We have no comments on the proposed retention of the two common staircases noting that they are retained for the use of the adjoining building to ensure compliance with the Building Ordinance (BO) and relevant regulations as indicated on your attached drawings.</p> <p>c. Detailed comments on the proposed scheme under the BO will be given at the building plans submission stage.</p>	Noted.

2. Head of Energizing Kowloon East Office, DEVB	
<p>(a) The proposed redevelopment for hotel use is generally welcomed from the Energizing Kowloon East policy perspective.</p> <p>(b) The applicant has proposed to “entirely set back 3 m from its site boundary along Tai Yau Street” to comply with the NBA requirement stipulated in the OZP. From the perspective of enhancing walkability, the proposed setback would contribute to a more spacious pedestrian environment along the northern footpath of Tai Yau Street which has been identified as one of the major pedestrian routes in the area under the “San Po Kong Business Area Pedestrian Environment and Traffic Improvement- Feasibility Study” promulgated by EKEO.</p>	

Public Comments received on 1 Feb 2026	Applicant's Response
1. Concerns on “Inadequate Greening”	
<p>The commenter expressed concern that greening measures were “inadequate”.</p>	<p>The current proposal of greening measure is designed in accordance with the Sustainable Building Guidelines outlined in the practice notes of the Buildings Department.</p> <p>According to the guidelines, the minimum requirement of overall greening provision is 485.210 sq.m. The overall greenery provision of the proposed development is 808.457 sq.m., which is significantly greater than the requirement.</p> <p>Moreover, all greenery will be managed and maintained by the lot owner to ensure it remains sustainable and attractive, thereby achieving a genuine enhancement of the environment and community.</p>

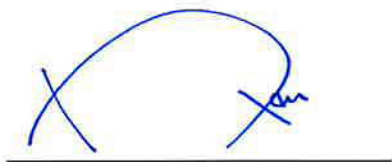
Furthermore, we would like to supplement the revised architectural drawings (Drawing no. GBP-01 (Rev.B) and GBP-02 (Rev.B) and the supporting planning statement for your kind processing.

Please be noted that the layout as indicated in the architectural drawings are subjected to detail design, such as the setback in backlane, the layout of landscape garden and guestroom etc.

Should you have enquiry or further information required, please feel free to contact the undersigned at

[REDACTED]

Yours faithfully,



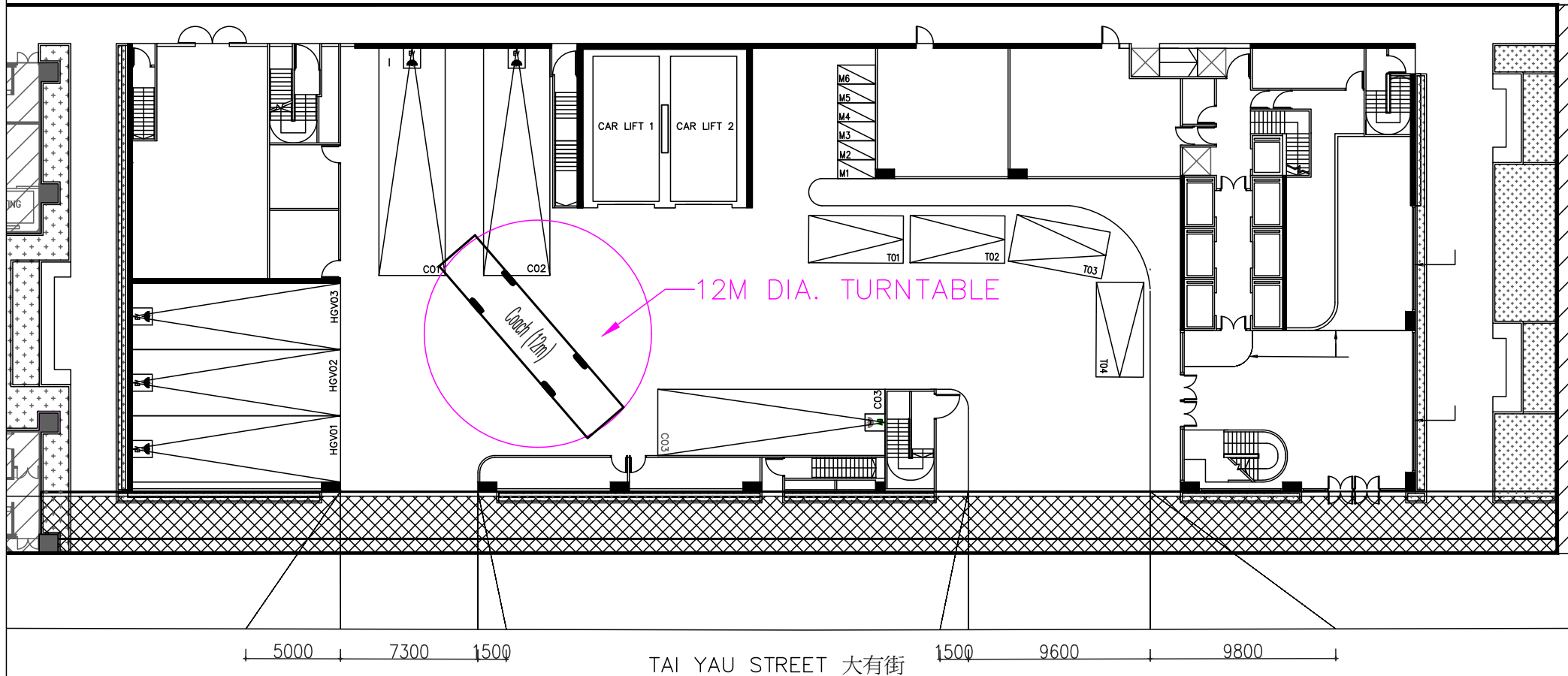
Mr. Ron Luen

Ron Luen & Company Ltd.

Encl. Appendix 1: Figure T-1 Turntable Proposal

c.c. Client

Appendix 1 – Figure T-1 Turntable Proposal



PROJECT TITLE
Section 16 Planning Application for Proposed Hotel with Minor Relaxation of Non-building Area Restriction at Nos. 20-24 Tai Yau Street, San Po Kong, Kowloon

FIGURE T - 1

DATE
JAN 2026

SCALE
N.T.S

DRAWING TITLE

DRAWN
SF

PROJECT NO.
J03007

TURNTABLE PROPOSAL

