

**PROPOSED MINOR RELAXATION OF PLOT RATIO (PR) AND BUILDING HEIGHT (BH) RESTRICTIONS FOR PROPOSED HOTEL USE AT
107-109 WAI YIP STREET, KWUN TONG (KWUN TONG INLAND LOT NOS. 570, 571, 572 & 573)**

Planning Application No. A/K14/835

Response-to-Comment Table

Departmental Comments	Response
Email dated 10th July 2025 refers: Comments of the Environmental Protection Department	
<p>1. Based on Section 5.6.3 of the Supplementary Planning Statement (SPS), the applicant has confirmed that central air-conditioning system will be provided for the proposed development and the development will not rely on opened window for ventilation. The fresh air intake point of the air conditioning system will also be properly located to meet the buffer distance requirement for roads stipulated in Chapter 9 of the HKPSG.</p>	<p>Noted with thanks.</p>
<p>2. According to Section 2.1 of the SPS, the Site was previously occupied by a 10-storey (including ground floor) industrial building. With consideration of the land use history of the Site, the applicant should properly conduct the land contamination assessment. Please be advised that no construction works shall be commenced prior to the completion of the land contamination assessment including the remediation works.</p>	<p>Please be clarified that it was previously occupied by a 10-storey (including ground floor) industrial-office (I/O) building. Similar to other I/O buildings in the area, despite being ancillary and directly related to an industrial (or godown) operation, the former I/O building on the Application Site was in fact an office building in nature. Hence, there is no anticipated land contamination issue for the Proposed Development. Please find an evaluation under Section 5.6.3 of the SPS.</p>
<p>3. The applicant carried out Sewerage Impact Assessment (SIA) for the proposed development and we have the following comments on the SIA report in Appendix 2 of the SPS:-</p>	

4. The applicant carried out Sewerage Impact Assessment (SIA) for the proposed development and we have the following comments on the SIA report in Appendix 2 of the SPS:-

Appendix 1 Table 3

It appears that some of the sub-catchments are under planning stage, please provide supporting documents to show that the developments are on-going/completed to support the use of smaller estimated sewage flows comparing to the previous developments:

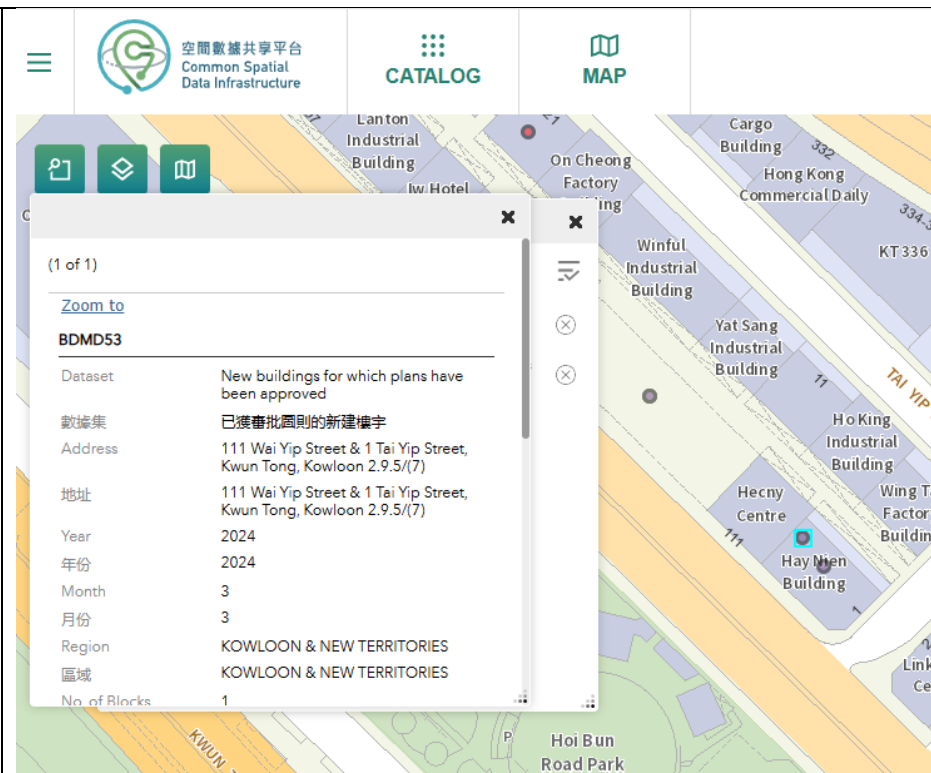
Catchment A – 7. Proposed Commercial Development at 111 Wai Yip Street and 1 Tai Yip Street (Planning Application No. A/K14/809)

Catchment A – 13. Planned Development (334-336 & 338 Kwun Tong Road)

Catchment C – 20. Proposed Commercial Development at 5 Lai Yip Street (Planning Application No. A/K14/810)

Catchment C – 22. Proposed Commercial Development at 9 Lai Yip Street (Planning Application No. A/K14/748)

Catchment C – 23. Proposed Commercial Development at 11 Lai Yip Street (Planning Application No. A/K14/806)



Extracted from CSDI as at 11.9.2025

According to published information of BD, building plans have been approved for 111 Wai Yip Street and 1 Tai Yip Street after the planning approval, which proves that Catchment A – 7 is an on-going development.

For other planning approvals (i.e. Catchment A – 13, Catchment C – 20, 22 and 23), since no information showing their active status is found, the sewerage capacities are further tested in SIA taking into account the existing uses and parameters of these sites. Attached please find the replacement pages of the updated SIA.

General

Please re-visit the assessment based on above comments

Noted with thanks. Attached please find the replacement pages of the updated SIA.

Please note that the implementation of sewerage works shall also meet the satisfaction of DSD

Noted with thanks.

Effective mitigation measures should be provided for pipe sections with utilization rate over 90% (including those pipes proposed to be upgraded), if any, to ensure the proposed development would not cause adverse impact to the public sewerage system in long-term	Noted with thanks.
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.	Noted with thanks.
Email dated 4th September 2025 refers:	
Comments of the Kowloon District Planning Office of the Planning Department	
Supplementary Planning Statement (SPS) 1. Bonus PR/GFA: it is noted that bonus PR/GFA of about 0.539 and 630m ² will be claimed for the proposed setback at Wai Yip Street in the latest submission. Such bonus GFA, limited to the proposed setback Wai Yip Street, to be approved under the Building (Planning) Regulations separately has been considered and included in the proposed scheme. Please clarify the rationale of not accounting the bonus GFA of the setback area along the back alley in your submission and discuss if the bonus GFA of 411.475m ² at the back alley, which could be approved under B(P)R, could be fitted in the current proposed bulk.	Please be clarified that the Applicant will claim only the bonus PR/GFA with respect to the proposed setback along Wai Yip Street. The applicant has not considered to claim bonus PR/GFA for the setback areas along the back alley.
2. Table 4.1 of the SPS (Remark 1): As the current proposal is for proposed hotel use as well as minor relation of PR and BH, please discuss the site constraint taking into account the fulfillment of the setback requirement per the Outline Development Plan. Please provide the floor area of the podium and typical floors. In terms of the proposed BH, whether it has been minimised by provision of basement floor and minimising of floor-to-floor height.	Relevant justifications are provided under Section 5.5 of the SPS. Please find Section 5.5 further elaborated.
3. The public passageway on G/F proposed under previous approval as a planning and design merit to allow direct connection from back alley to Wai Yip Street is no longer provided. Besides, communal garden was also proposed under the previous approved scheme. Since you are using previous	The previous scheme is for Eating Place/Shop and Service, Office uses which are generally more complementary with inviting communal areas and semi-private space for encouraging interactive commercial activities. As different from the previous scheme, the subject application is for hotel use, for which providing quality sleeping accommodation, building safety,

planning approval as justification for the current application, please provide justifications of not honoring such merits under that prior approval.	facility management and assistance to patrons are the main focus. In the previous scheme, the communal garden at 1/F would be opened to the public, which will compromise the management quality and privacy under the current scheme. Under the same building height, some of the internal areas have to be reserved for the provision of adequate facilities for the operation of the hotel and facilities ancillary to the functions of the hotel under the relevant licensing requirements. Nonetheless, external features of the design merits under the previous approved scheme are retained.
4. It is noted that building design elements of Sustainable Building Design Guidelines SBDG (APP-152) have been considered in the Proposed Scheme, i.e. the requirement of greenery site coverage. Please outline all design elements being adopted in the proposed scheme, particularly the requirement for building separation and setback. Please clarify the width of the building façade fronting Wai Yip Street.	The subject site with an area (i) less than 20,000m ² and (ii) proposed with building having a continuous projected façade length (Lp) of below 60m, fall outside the prescribed categories requiring compliance with the building separation requirements in accordance with APP-152. Buildings fronting a street less than 15m wide should be set back to comply with one of the following requirements:
5. FIG-01- clarify if the entrance foyer is free for public access, particularly public could walk from Wai Yip Street to the back alley without entering the proposed development.	Please be clarified that under the current design, the entrance foyer is free for public access that the public could walk freely from Wai Yip Street to the back alley through the proposed development without any access control. This access arrangement is subject to detailed design and review.
6. FIG-06- annotate the width if the non-building area at the back alley.	Noted with thanks. Please find revised FIG-06.
Visual Impact Assessment 7. Table 1, Remark (a) of the VIA: please refer to my comments at paragraph 2 above.	Relevant justifications are provided under Section 5.5 of the SPS. Please find Section 5.5 further elaborated.
8. Table 1, Remarks (a) and (e) of the VIA: Based on Remark (a), a building bulk inclusive of bonus GFA resulted from setback from Wai Yip Street equals to 17,487m² (please provide the breakdown of this assumed GFA) serves as the basis of the VIA. According to the SPS, no MiC method is considered. However, based on Remark (e), MiC construction methods may be considered at detailed design stage. Please discuss the GFA implication resulted from adaptation of MiC method towards the Proposed Scheme. Whether the existing building bulk could accommodate the GFA, particular the BH of 115mPD as proposed.	Please find the breakdown included in Remark (a) and Remark (e) removed as the Applicant has not considered MiC construction methods at this stage.

<p>9. Paragraph 2.2- bulletpoint 2. “a 3m wide public passage at G/F to serve as a short-cut between Wai Yip Street and the back lane through to other existing buildings on Tai Yip Street”. According to the SPS, the 3m wide public passage at G/F is no longer proposed. Please clarify.</p>	<p>Please find Para. 2.2 with this statement removed.</p>
<p>Email dated 10th September 2025 refers: Comments of the Kowloon District Planning Office of the Planning Department</p>	
<p>1. SPS- Para. 5.4 : ‘3m-wide public passage at G/F - Brings Improvement to Connectivity The two accesses to Tai Yip Street from Wai Yip Street are about 250m apart. The proposed public passage on G/F will give an alternate access to Tai Yip Street to shorten the travel distance. This helps to break the long street grid down to a more reasonable and pleasant distance.’</p> <p>Please clarify whether the 3m-wide public passage at G/F under the previous will be honored in the current scheme.</p>	<p>Please be clarified that no 3m-wide public passage at G/F will be committed at this stage. Please find Para 5.4 revised.</p>
<p>2. SPS- Para. 5.5 : ‘As such, the proposed minor relaxation of BHR is considered minor in nature and should be considered acceptable. The proposed full-height setbacks would further contribute to an enhanced urban environment with wider public footpath, better visual permeability and air ventilation, which would mitigate the visual impact if any. The Proposed Scheme generally meets the criteria for considering application for minor relaxation of BHR as mentioned in paragraph 8.2 above.’</p> <p>Please make reference to Section 7 of the Explanatory Statement of OZP on BHR in KTBA, in particular, Para. 7.4 for relevant criteria for relaxation of BHR. Please identify whether the Proposed Scheme falls in to criteria (a) to (f).</p>	<p>It is considered that the Proposed Scheme falls into criteria (b), (c), (d) and (f) Para. 7.4 of the Explanatory Statement of OZP for relevant criteria for relaxation of BHR. Please find Section 5.5 further elaborated.</p>

3. Please confirm that no vertical greening would be proposed.	Please be confirmed that the Applicant has not considered providing vertical greening at this stage.
Email dated 11st September 2025 refers:	
Comments of the Kowloon District Planning Office of the Planning Department	
1. According to the third sentence of 4.1.2 Enhancement of Streetscape under Landscape Proposal, it stated that “As a result, pavement tree planting is not proposed within the setback area”, however, we found that you have proposed to plant 13 shaped plants on the setback area along Wai Yip Street in Drawing No. PT01. Please clarify whether you are intended to plant 13 shaped plants on the setback area along Wai Yip Street? We also noted that you are intended to claim bonus GFA by surrender of land for road widening (including the setback area along Wai Yip Street) for public passage. By designing 56.2m ² greenery area at the setback area along Wai Yip Street, please clarify whether this design will affect the function of public passage.	Please be clarified that the setback area along Wai Yip Street is designated for the pure function of public passage at this stage and no greenery area or trees is proposed. Attached please find the relevant layout plans and Landscape Proposal updated.
2. According to the second bullet point of 2.2 under Visual Impact Assessment, it stated that “Provide a 3m wide public passage at G/F to serve as a short-cut between Wai Yip Street and the back lane through to other existing buildings on Tai Yip Street. The width of 3m is an appropriate length for serving the intended purpose. The public passageway will be opened 24 hours daily, subject to the grant of bonus GFA accounting for that area.” When we look at Figure 3.1 G/F Layout Plan, we cannot find a 24 hour passageway connecting from Wai Yip Street to the back lane, please clarify whether the 24 hour public passageway will be provided under the proposed scheme.	Please be clarified that no 3m-wide/ 24 hour public passage at G/F will be committed at this stage. Please find Para 2.2 of VIA revised.
Email dated 11st September 2025 refers:	
Comments of the Drainage Service Department	
[I] For Sewerage Impact Assessment (SIA)	
<u>LDD’s comments from sewerage network planning perspective</u>	
1 Appendix 1 Table 5 - In accordance with Section 5.1.3 of the Sewerage Manual Part 1 published by this department, very fast flow is not desirable and the maximum velocity shall be limited to 3 m/s, or it may be relaxed to 6 m/s provided that the conditions stated therein could be achieved. In this regard, flow velocity up	According to data from DSD’s drainage record plan, Segment S12-S13 under the existing condition already has a flow velocity up to 6.2m/s. In the submitted SIA, Segment S12-S13 is proposed to be upgraded from 400mm to 525mm diameter pipe to fit with the upstream segments.

<p>to 7.35 m/s is observed in the hydraulic analysis. Please review the proposed sewerage arrangement, including but not limited to the proposed pipe gradient, proposed pipe materials, erosion protection measures, etc. where appropriate.</p>	<p>Subject to detailed design, the flow velocity of Segment S12-S13 is controlled within 3m/s by adjusting the downstream invert level in the SIA.</p>
<p><u>MSD's comments from district operation and maintenance viewpoint</u></p> <p>2 I refer to EKEO's Technical Study on the Lai Yip Street Site in Kowloon East (https://www.ekeo.gov.hk/filemanager/ekeo/common/sustainable-growth/20230116_ES_final.pdf). Please review and double-confirm with EPD and EKEO regarding the estimated discharge flow and calculation about Catchment D Sites 26,27,29 adopted in the SIA, as these sites are likely to be re-developed into a commercial development.</p>	<p>Noted with thanks. The sewerage capacities are further tested in SIA taking into account EKEO's planned development on the Lai Yip Street. Attached please find the replacement pages of the updated SIA.</p>
<p>3 Based on the preliminary SIA submitted, considerable sections of public sewers downstream located at or across busy carriageways are proposed to be upgraded to ensure sufficient capacity of the sewerage system to take up the discharge arising from the site. The applicant is reminded to plan and ensure feasibility of such proposed upgrading works at earlier stage of the project. The proposed upgrading works and connection works proposed should be aligned with a detailed Sewerage Impact Assessment to be submitted at later detailed design stage for EPD and DSD's agreement and implemented by the development at the cost of the developer to and up to DSD's satisfaction (as an approval condition).</p>	<p>Noted with thanks. The Applicant will plan and ensure feasibility of such the proposed upgrading works and connection works under a detailed SIA to be submitted at the post-planning approval stage.</p>
<p>[II] For Drainage Impact Assessment (DIA) <u>Coordinated comment from LDD and MSD</u></p> <p>4 Please provide a project profile in accordance with <i>Appendix I</i> of <DSD Advice Note No.1> and append in your Planning Statement for clarity. While DIA is considered not required at this planning stage, in view of the scale of the project and location at low-lying coastal area, DIA is required to be conducted at later detailed design stage (as an approval condition).</p>	<p>For clarity sake, please find in Appendix 6 a project profile in accordance with Appendix I of <DSD Advice Note No.1>, which contains only relevant information extracted from the formal planning application.</p>
<p>5 Please observe <DSD's Practice Note 2/2023 - Guidelines on</p>	<p>Noted with thanks. The Applicant will incorporate site-specific flood</p>

<p>Flood Resilience> in your planning and detailed design. In particular, for this proposed development at coastal areas, please pay attention to the potential increase of sea level and plan a higher design formation level as far as practical. Sufficient structural prevention should be planned to ensure the flood resilience of the development. Sufficient operation arrangement to ensure emergency preparedness should be proposed to ensure the flood resilience of the development if other structural measures were considered impractical. Considerations for flood resilience should be presented in the DIA to be submitted at later stage.</p>	<p>resilience measures into the detailed design under a detailed SIA to be submitted at the post-planning approval stage.</p>
<p>6 Layouts should be appended in the DIA to be submitted at later stage, showing existing and proposed modification / abandonment arrangement of all existing internal terminal manholes, connection pipes and proposed new connection works to downstream public network.</p>	<p>Noted with thanks. The required information will be submitted at the detailed design stage.</p>
<p>[III] General <u>MSD's comments from district operation and maintenance viewpoint</u> The applicant / developer is required to observe the following obligations throughout the project delivery:-</p> <p>1 For your SIA and DIA to be submitted at later detailed design stage, please append layout(s), indicating the followings with proper legends:</p> <ul style="list-style-type: none"> (i) all existing public drains and sewers maintained by DSD in the vicinity; (ii) existing and proposed internal drainage / sewerage connections, to be abandoned, constructed or modified by your development and handed over to DSD; (iii) proposed modification / upgrading works if any on the public drainage / sewerage system, to be implemented by your development to be handed over to DSD for maintenance; (iv) existing and proposed road drainage facilities maintained by / to be handed over to HyD; (v) proposed terminal manholes / internal drains or sewers 	<p>Noted with thanks. The required information will be submitted at the detailed design stage.</p>

<p>to be maintained by future lot management office;</p> <p>(vi) proposed general layout of the development to demarcate road / footpath area if any; and</p> <p>(vii) boundary of the concerned land lot and proposed drainage reserve area inside the lot</p> <ul style="list-style-type: none"> • For any pipes (including existing connection pipes from the lot) proposed to be abandoned / modified / constructed, please present with proper legends/colors to distinguish for clarity. • Please indicate pipe sizes and manhole details (ref nos., invert levels, etc.) in the layout. • Please confirm in your drawing(s) that the proposed sizes of pipes shown are internal diameters. Please ensure that the proposed sewerage pipe(s) would have internal diameter not less than 200mm, (e.g. around OD225mm for PE pipe) and proposed stormwater drainage pipe(s) of internal diameter not less than 225mm for future maintenance concern. 	
<p>2 It is the developer's responsibility to identify/locate the existing government sewers and stormwater drains to which drainage connections from his site are to be proposed. You are required to verify that downstream existing government drains/sewers, to which connections are proposed, are in normal working conditions and capable for taking the discharge from the site.</p> <p>Your project is required to conduct condition survey (CCTV submission file format refer to below) and arrange mitigation measures (e.g. pipe clearance or rehabilitation works) where needed to ensure sound hydraulic performance. Result of condition survey and associated mitigation measures should be discussed in the SIA and DIA for agreement with DSD.</p>	<p>Noted with thanks. The condition surveys as required will be proposed and agreed with DSD at the detailed design stage to ensure sound hydraulic performance.</p>
<p>3 The applicant/developer is required to ensure that no construction debris, silt and sediments, or cementitious materials will be discharged to or deposited inside the public drains or sewers from the site. Any pipe blockage or damage arising from the construction works shall be made good at the cost of the developer and to our satisfaction.</p>	<p>Noted with thanks. The required information will be submitted at the detailed design stage.</p>

<p>For CCTV submissions regarding above #2 and #3, please provide at least one hardcopy with one CD (file format as below) to DSD/MSD for proper record purpose.</p> <ol style="list-style-type: none"> 1. The CCTV inspection report shall be in SRM format. 2. The CCTV video records shall be stored in WMV format. 3. The resolution of CCTV video records shall be between 350 to 480 lines. 4. The original frame rate and aspect ratio of the CCTV video shall be maintained in any file format conversion. 5. The minimum bit rate of the WMV files shall be 1000 kbps. 6. The CCTV video record files shall be named according to the following rules: <ol style="list-style-type: none"> a. <u>Pipe connecting to two manholes</u> For a pipe connecting two manholes, the manhole feature numbers where CCTV records started and ended should be provided in the file name. Format: "Manhole number where CCTV records started"- "Manhole number where CCTV records ended".wmv , e.g. SMH1001234-SMH1005678.wmv b. <u>Pipe connecting to one manhole only</u> For a pipe connecting one manhole only, the manhole feature number shall be provided in the file name. Format: "Manhole number".wmv , e.g. SMH1001234.wmv 	
<p>4 The applicant/developer should ensure that your proposed scheme would comply with the requirements stipulated in Stormwater Drainage Manual, Sewerage Manual, DSD Standard Drawings, DSD Technical Circulars, Practice Notes and Guidelines, etc.</p>	<p>Noted with thanks. The required information will be submitted at the detailed design stage.</p>
<p>5 The applicant/developer should ensure that adequate clearance between the existing/proposed drainage facilities and the existing/proposed utilities shall be provided in accordance with DSD Technical Circular No. 4/2019 – Handling of Utility Services Encroaching upon Public Drainage Facilities. Embedment or intrusion of utilities services in the existing drainage facilities is prohibited. In case the minimum clearance requirement could not be provided due to site constraints, please inform this office for further action.</p>	<p>Noted with thanks.</p>
<p>6 Any proposed manholes should be located such that the disruption to the traffic will be minimal when their covers are lifted under normal maintenance operations and the openings of the manholes should be confined within one traffic lane as far as possible. For</p>	<p>Noted with thanks.</p>

<p>proposed manholes with multi-part covers, the openings should also be designed to avoid locating at the middle of carriageway of major roads, road junctions and intersections and should be provided at off-road areas or in the slow traffic lane of carriageway as far as possible.</p>	
<p>7 The applicant/developer should review proposed scheme to minimize level difference between the proposed connection invert level and outlet invert level at Government sewage/stormwater manhole(s) as far as practical. In case that the level difference is greater than 600mm, backdrop manholes in accordance with relevant DSD Standard Drawings should be constructed. Please incorporate this requirement in your drawings for construction to cater the potential tolerance in site works.</p>	<p>Noted with thanks. Please note that the level difference will be less than 600mm. The requirement will be further incorporated in the submission at the detailed design stage.</p>
<p>8 The applicant/developer should make sure that the any existing connections to the public drains and sewers are temporarily sealed off prior to commencement of works on site to avoid blockage to the public drains and sewers. Sufficient peripheral drains with adequate capacity should be provided around the site to make sure that all rainwater falling on or flowing onto the site will be properly intercepted and carried off into existing drainage system without increasing the risk of flooding to the subject site and the adjacent areas. In this regard, please indicate on the drawings details of the peripheral drains and confirm that the proposed peripheral drains around the site and the existing downstream drainage system for receiving the discharge from the site will have sufficient capacity to cope with the runoff.</p>	<p>Noted with thanks. The required information will be submitted at the detailed design stage.</p>
<p>9 The project team is reminded to exercise extreme care and ensure safe working methods when working in the vicinity of any existing public drainage/sewerage facilities, for safety concern and ensure also not to disturb or cause damage to the existing drainage/sewerage facility.</p>	<p>Noted with thanks.</p>

Email dated 15th September 2025 refers: Comments of the Urban Design Unit of UD&L Section, Planning Department	
Supplementary Planning Statement (SPS)	
2. Section 4.2 – Please clarify if requirements of building setback and building separation under SBDG are fulfilled.	
3. Section 5.5, 3rd Para. – Please revise to read as “ better maintaining visual permeability...”	Noted with thanks. Please Section 5.5 revised.
4. Section 5.6.2 Subheading – Please revise the subheading to read as “No Insurmountable Visual Impacts” to tally with the submitted VIA.	Noted with thanks. Please find the subheading revised.
5. It is noted from the SPS (Section 5.4), Planting Plan (G/F) (Landscape Proposal at Appendix 3) and VIA (Para 2.2) that a 3m-wide public passage at G/F between Wai Yip Street and the back lane to be opened 24 hours daily is proposed, which does not seem to tally the Proposed Development Scheme at Appendix 1. The Consultant should clarify/rectify as appropriate.	Please be clarified that no 3m-wide public passage at G/F will be committed at this stage. Please find the relevant paragraphs revised.
6. To facilitate understanding of how the proposed development may be perceived by the pedestrian, visual materials, such as artist’s rendering illustrating the proposed development at a closer scale are relevant in support of the application.	Please find an visual illustration in FIG-07 of Appendix 1 – The Proposed Development Scheme showing the proposed development at a closer scale particularly the setback area along Wai Yip Street.
7. The Consultant may wish to supplement on how the proposed development would comply with the criteria for consideration of applications of minor relaxation of building height restriction as per Para. 7.4 of the ES of the OZP.	It is considered that the Proposed Scheme falls into criteria (b), (c), (d) and (f) Para. 7.4 of the Explanatory Statement of OZP for relevant criteria for relaxation of BHR. Please find Section 5.5 further elaborated.
Visual Impact Assessment	Noted with thanks. Attached please find the replacement pages of the updated VIA.
8. Para. 1.4 – Please remove “and improve air ventilation” to avoid confusion.	

9. Para. 5.3 – Please review if there are <u>six</u> short to medium range VPs instead of five as per Table 2.	Noted with thanks. Attached please find the replacement pages of the updated VIA.
<u>Baseline Scenario</u> 10. Section 6.1 - It is noted that the photomontages “mainly compare the existing condition with the proposed development”, while the visual impact as illustrated throughout this section is “compared with the BHR of +100mPD”. Please clarify and revise Section 6.1 as appropriate.	Noted with thanks. Attached please find the replacement pages of the updated VIA.
<u>General</u> 11. The Consultant is requested to confirm if the bulk of the proposed development at the subject site and the planned/committed developments in the surrounding have been accurately reflected on the photomontages. We reserve our comments on the VIA and the photomontages subject to the Consultant’s confirmation and any revision of the photomontages.	Noted with thanks.
12. According to the VIA, the applicant may consider adopting MiC construction methods for the is project subject to detailed design. Please clarify if this is still the applicant’s intension.	The Applicant has not considered MiC construction methods at this stage.
<u>VP1</u> 13. Figure 6.1, Existing Photo (Left) – Please rectify the annotation “Subject Proposed Development (+115mPD)” to avoid confusion.	Noted with thanks. Attached please find the revised Figure 6.1 of the updated VIA.
<u>VP2</u> 14. Para. 6.7 and Table 3 – As per the submitted photomontages and to tally with Para. 6.5, as the “as-of-right building height level of +100mPD under OZP is not visible from this viewpoint”, it should be reviewed whether the rating of visual	Noted with thanks. Attached please find the replacement pages of the updated VIA.

impact would be <u>negligible</u> instead of slightly adverse.	
<u>VP3</u> 15. Para. 5.4 – It should be review whether this VP is at the <u>northwest</u> of the site instead of southeast.	Noted with thanks. Attached please find the replacement pages of the updated VIA.
<u>VP4</u> 16. Para. 5.4, Tables 2 and 3, Drawing Title and Section 6 – It should be review whether the VP is located at the junction of Elegance Road and <u>Ngau Tau Kok Road</u> instead of Kwun Tong Road <u>throughout the VIA</u> .	Noted with thanks. Attached please find the replacement pages of the updated VIA.
<u>VP5</u> 17. Para. 5.4 and Table 2 – It should be reviewed whether the viewing distance of VP5b is about <u>1km</u> instead.	Noted with thanks. Attached please find the replacement pages of the updated VIA.
18. Table 2 – Pleased review if the viewing frequency would be <u>frequent</u> instead of occasional.	Noted with thanks. Attached please find the replacement pages of the updated VIA.
19. Para. 6.15 – Please revise to read as “...marginal increase in obstruction to the sky view <u>and mountain backdrop</u> ”.	Noted with thanks. Attached please find the replacement pages of the updated VIA.
20. Figure 6.5b – (a) It should be reviewed whether the positon of the red dotted line indicated BHR of 100mPD would be too high.	Noted with thanks. Attached please find the revised Figure 6.5b of the updated VIA.
(b) It should be reviewed whether approved Application No. A/K14/822 would be visible from this VP.	Application No. A/K14/822 would be invisible from this VP.
<u>VP6</u> 21. Para. 6.18 – Please confirm and supplement whether the proposed development <u>including rooftop structures</u> will	Noted with thanks. Attached please find the replacement pages of the updated VIA

intercept the 20% Building Free Zone.	
<p>22. Figure 6.6 –</p> <p>(a) It seems that the delineation of the 20% Building Free Zone in the photomontage is inaccurate. Please adopt the photo from Strategic Viewing Point 4 from the website of Planning Department for assessment of visual impact.</p>	Noted with thanks. Attached please find the revised Figure 6.6 of the updated VIA.
<p>(b) It seems that the BHs of the proposed development at 115mPD and the surrounding planned/committed developments are slightly underestimated.</p>	Noted with thanks. Attached please find the revised Figure 6.6 of the updated VIA.
<p>(c) The current BHR of 100mPD at the subject site should be annotated, similar to presentation of other photomontages.</p>	Noted with thanks. Attached please find the revised Figure 6.6 of the updated VIA.
<p>23. The annotated locations of approved Applications No. A/K14/810, A/K14/806 and A/K14/774 are inaccurate and may be confusing. Please consider grouping the annotations and ensure accuracy.</p>	Noted with thanks. Attached please find the revised Figure 6.6 of the updated VIA.
<p><u>VP7</u></p> <p>24. Figure 6.7 and Para. 6.21 – The Consultant is requested to confirm if the bulk of the proposed development should be extended slightly to the right and slightly obstruct the sky view. Please supplement in the paragraph and revise the photomontage if affirmative.</p>	VP7 has been selected for consistency with the last approved planning application for the same application site (Application No.: A/K14/780). The photograph for this submission was taken from a position marginally to the left of the previous submission; accordingly, the photomontage for this submission remains correctly aligned and positioned.
<p>25. Para. 6.21 and Table 3 – As per the comment above and subject to revision of the photomontage, it should be reviewed whether the rating of visual impact would be slightly adverse instead of negligible, subject to confirmation by the Consultant.</p>	Noted with thanks. Attached please find the replacement pages of the updated VIA.
Email dated 15th September 2025 refers:	

Comments of the Kowloon District Planning Office of the Planning Department	
1. Please annotate the height of the rooftop ancillary structure at FIG-06 for checking.	

Departmental Comments		Applicant's Responses
Comments of Commissioner for Transport (Contact Person: Mr. LAW Shun Chit, Tom, Tel No.: 2399 2459)		
b)	Section 3.3 – As only one H/MGV L/UL bay could be provided, please propose traffic management measures to avoid traffic obstruction at Wai Yip Street with busy traffic, such as shared use with coach parking spaces with increased headroom not less than 4.7m.	To offer greater operational flexibility, we would like to propose for the 3 coach laybys to be converted to “Shared-use” for Coaches/buses and M/HGV. These 3 laybys have headroom of not less than 4.7m.
c)	Section 3.10 – Please supplement mitigation measures to avoid adverse traffic impact in case of the only car lift is broken down.	<p>Since the use of goods vehicle loading/unloading bay and “Shared-use” for Coaches/buses and M/HGV layby is by reservation only, the Management Office would be aware of the arrival times of the vehicles, thus enabling efficient scheduling and coordination.</p> <p>In the event that the car lift has broken down, the following additional measures will be undertaken for vehicles which use the car lift, ie, LGV, private car and motorcycle:</p> <p><i>#1 Measure for LGV</i> The 3 laybys of COACH-1, COACH-2 and COACH-3 in Figure 3.1 are now converted to “Shared-use” for Coaches/buses and M/HGV, and could be used by LGV.</p> <p><i>#2 Measure for Private cars</i> The management staff will direct the driver to use nearby public car park eg NEO at 123 Hoi Bun Road.</p> <p><i>#3 Measure for Motorcycle</i> The management staff will direct the driver to use nearby public car park opposite One Bay East Citi Tower at 83 Hoi Bun Road.</p>
d)	Section 4.11, Table 4.5 and Appendix 4 – The junction modification at as shown in Kwun Tong District Council Traffic Development and Transport Committee Discussion Paper No. 3/2023 - Proposed Pedestrian Environment	<p>Table 4.5 and Appendix 4 have been updated.</p> <p>Year 2032 capacity analysis of J8 - Kwun Tong Road / Lai Yip Street for the cases without and with the Proposed Development are found in the Appendix 1 of the revised TIA in Appendix A.</p>

Departmental Comments		Applicant's Responses
Comments of Commissioner for Transport (Contact Person: Mr. LAW Shun Chit, Tom, Tel No.: 2399 2459)		
	Improvement Works in Kwun Tong Business Area – Ngau Tau Kok Portion is to be considered.	
e)	Table 4.4 – The additional use of Regal Riverside Hotel from TD 05/2006 Trip Generation Survey Report is not representative of the trip generation of hotels with large room counts. A sensitivity test on adopting mean rates from TPDM is recommended in case the scale of the proposed hotel development is changed subsequently (e.g. ratings other than three-star, room sizes and count, etc.).	The sensitivity test is conducted by adopting the mean rates from TPDM and is included in Section 6 of the revised TIA which is found in Appendix A .
f)	Table 4.6 – Subject to the result of the sensitivity test in item (e), traffic improvement measures should be proposed to meet the junction performance requirement of RC not less than 15%.	In order to meet RC not less than 15%, the PM cycle time of J2 - Wai Yip Street / Shun Yip Street, could be increased from 108 to 112 seconds. Year 2032 capacity analysis for the cases without and with the Proposed Development are found in the Appendix 1 of the revised TIA in Appendix A .
g)	Figure 3.1 –Please propose passenger safety measures should between the proposed taxi / private car pick-up / drop-off points / coach parking spaces and lobby. Please supplement the goods delivery routes between HGV L/UL bay and lifts.	Directional signs will be installed at key locations to guide passengers to the lobby. In addition, management staff will be deployed to guide passengers. Goods delivery routes between HGV L/UL bay and lifts are included in Figure 3.1 of the revised TIA in Appendix A .
h)	Appendix 1, J7 – The critical y does not match with the calculated values.	The critical y of J7 - Wai Yip Street / Lai Yip Street has been amended. Please see the detailed calculation in Appendix 1 of the revised TIA in Appendix A .
i)	Appendix 1, J1 & J2 – Please supplement queue estimation and review whether upstream junctions would be affected.	The queue estimation of upstream junctions J1 and J2 during the AM and PM peak hours is analysed, and the results are presented in Tables R1 and R2 below. TABLE R1 QUEUE LENGTH FOR J1 - HOI BUN ROAD / SHUN YIP STREET

Departmental Comments		Applicant's Responses																																																																																																																																																																																																																											
Comments of Commissioner for Transport (Contact Person: Mr. LAW Shun Chit, Tom, Tel No.: 2399 2459)																																																																																																																																																																																																																													
		<table><tr><th>Lane Approach</th><th>Period</th><th>Cycle Time (sec)</th><th>Direction</th><th>Traffic Flow (veh/hr)</th><th>Effective Green (sec)</th><th>Queue Length (m/lane)</th></tr><tr><td colspan="7">Existing Condition</td></tr><tr><td rowspan="4">Hoi Bun Road WB</td><td>AM</td><td>118</td><td rowspan="2">SA</td><td>332</td><td>48</td><td>39</td></tr><tr><td>PM</td><td>108</td><td>258</td><td>38</td><td>30</td></tr><tr><td>AM</td><td>118</td><td rowspan="2">SA+RT</td><td>339</td><td>48</td><td>40</td></tr><tr><td>PM</td><td>108</td><td>261</td><td>38</td><td>30</td></tr><tr><td rowspan="4">Hoi Bun Road EB</td><td>AM</td><td>118</td><td rowspan="2">LT</td><td>245</td><td>28</td><td>37</td></tr><tr><td>PM</td><td>108</td><td>332</td><td>29</td><td>44</td></tr><tr><td>AM</td><td>118</td><td rowspan="2">SA</td><td>235</td><td>28</td><td>35</td></tr><tr><td>PM</td><td>108</td><td>234</td><td>29</td><td>31</td></tr><tr><td colspan="7">Without the Proposed Development</td></tr><tr><td rowspan="4">Hoi Bun Road WB</td><td>AM</td><td>118</td><td rowspan="2">SA</td><td>664</td><td>84⁽¹⁾</td><td>38</td></tr><tr><td>PM</td><td>108</td><td>562</td><td>75⁽¹⁾</td><td>31</td></tr><tr><td>AM</td><td>118</td><td rowspan="2">RT⁽¹⁾</td><td>341</td><td>48</td><td>40</td></tr><tr><td>PM</td><td>108</td><td>328</td><td>38</td><td>38</td></tr><tr><td rowspan="4">Hoi Bun Road EB</td><td>AM</td><td>118</td><td rowspan="2">LT</td><td>389</td><td>28</td><td>58</td></tr><tr><td>PM</td><td>108</td><td>398</td><td>29</td><td>52</td></tr><tr><td>AM</td><td>118</td><td rowspan="2">SA+LT⁽¹⁾</td><td>454</td><td>28</td><td>68</td></tr><tr><td>PM</td><td>108</td><td>463</td><td>29</td><td>61</td></tr><tr><td colspan="7">With the Proposed Development</td></tr><tr><td rowspan="4">Hoi Bun Road WB</td><td>AM</td><td>118</td><td rowspan="2">SA</td><td>664</td><td>84⁽¹⁾</td><td>38</td></tr><tr><td>PM</td><td>108</td><td>562</td><td>75⁽¹⁾</td><td>31</td></tr><tr><td>AM</td><td>118</td><td rowspan="2">RT⁽¹⁾</td><td>348</td><td>48</td><td>41</td></tr><tr><td>PM</td><td>108</td><td>333</td><td>38</td><td>39</td></tr><tr><td rowspan="4">Hoi Bun Road EB</td><td>AM</td><td>118</td><td rowspan="2">LT</td><td>389</td><td>28</td><td>58</td></tr><tr><td>PM</td><td>108</td><td>398</td><td>29</td><td>52</td></tr><tr><td>AM</td><td>118</td><td rowspan="2">SA+LT⁽¹⁾</td><td>454</td><td>28</td><td>68</td></tr><tr><td>PM</td><td>108</td><td>463</td><td>29</td><td>61</td></tr><tr><td colspan="7">With the Proposed Development (Sensitivity Test for adopting mean rate)</td></tr><tr><td rowspan="4">Hoi Bun Road WB</td><td>AM</td><td>118</td><td rowspan="2">SA</td><td>664</td><td>84⁽¹⁾</td><td>38</td></tr><tr><td>PM</td><td>108</td><td>562</td><td>75⁽¹⁾</td><td>31</td></tr><tr><td>AM</td><td>118</td><td rowspan="2">RT⁽¹⁾</td><td>351</td><td>48</td><td>41</td></tr><tr><td>PM</td><td>108</td><td>340</td><td>38</td><td>40</td></tr><tr><td rowspan="4">Hoi Bun Road EB</td><td>AM</td><td>118</td><td rowspan="2">LT</td><td>389</td><td>28</td><td>58</td></tr><tr><td>PM</td><td>108</td><td>398</td><td>29</td><td>52</td></tr><tr><td>AM</td><td>118</td><td rowspan="2">SA+LT⁽¹⁾</td><td>454</td><td>28</td><td>68</td></tr><tr><td>PM</td><td>108</td><td>463</td><td>29</td><td>61</td></tr></table>	Lane Approach	Period	Cycle Time (sec)	Direction	Traffic Flow (veh/hr)	Effective Green (sec)	Queue Length (m/lane)	Existing Condition							Hoi Bun Road WB	AM	118	SA	332	48	39	PM	108	258	38	30	AM	118	SA+RT	339	48	40	PM	108	261	38	30	Hoi Bun Road EB	AM	118	LT	245	28	37	PM	108	332	29	44	AM	118	SA	235	28	35	PM	108	234	29	31	Without the Proposed Development							Hoi Bun Road WB	AM	118	SA	664	84 ⁽¹⁾	38	PM	108	562	75 ⁽¹⁾	31	AM	118	RT ⁽¹⁾	341	48	40	PM	108	328	38	38	Hoi Bun Road EB	AM	118	LT	389	28	58	PM	108	398	29	52	AM	118	SA+LT ⁽¹⁾	454	28	68	PM	108	463	29	61	With the Proposed Development							Hoi Bun Road WB	AM	118	SA	664	84 ⁽¹⁾	38	PM	108	562	75 ⁽¹⁾	31	AM	118	RT ⁽¹⁾	348	48	41	PM	108	333	38	39	Hoi Bun Road EB	AM	118	LT	389	28	58	PM	108	398	29	52	AM	118	SA+LT ⁽¹⁾	454	28	68	PM	108	463	29	61	With the Proposed Development (Sensitivity Test for adopting mean rate)							Hoi Bun Road WB	AM	118	SA	664	84 ⁽¹⁾	38	PM	108	562	75 ⁽¹⁾	31	AM	118	RT ⁽¹⁾	351	48	41	PM	108	340	38	40	Hoi Bun Road EB	AM	118	LT	389	28	58	PM	108	398	29	52	AM	118	SA+LT ⁽¹⁾	454	28	68	PM	108	463	29	61
Lane Approach	Period	Cycle Time (sec)	Direction	Traffic Flow (veh/hr)	Effective Green (sec)	Queue Length (m/lane)																																																																																																																																																																																																																							
Existing Condition																																																																																																																																																																																																																													
Hoi Bun Road WB	AM	118	SA	332	48	39																																																																																																																																																																																																																							
	PM	108		258	38	30																																																																																																																																																																																																																							
	AM	118	SA+RT	339	48	40																																																																																																																																																																																																																							
	PM	108		261	38	30																																																																																																																																																																																																																							
Hoi Bun Road EB	AM	118	LT	245	28	37																																																																																																																																																																																																																							
	PM	108		332	29	44																																																																																																																																																																																																																							
	AM	118	SA	235	28	35																																																																																																																																																																																																																							
	PM	108		234	29	31																																																																																																																																																																																																																							
Without the Proposed Development																																																																																																																																																																																																																													
Hoi Bun Road WB	AM	118	SA	664	84 ⁽¹⁾	38																																																																																																																																																																																																																							
	PM	108		562	75 ⁽¹⁾	31																																																																																																																																																																																																																							
	AM	118	RT ⁽¹⁾	341	48	40																																																																																																																																																																																																																							
	PM	108		328	38	38																																																																																																																																																																																																																							
Hoi Bun Road EB	AM	118	LT	389	28	58																																																																																																																																																																																																																							
	PM	108		398	29	52																																																																																																																																																																																																																							
	AM	118	SA+LT ⁽¹⁾	454	28	68																																																																																																																																																																																																																							
	PM	108		463	29	61																																																																																																																																																																																																																							
With the Proposed Development																																																																																																																																																																																																																													
Hoi Bun Road WB	AM	118	SA	664	84 ⁽¹⁾	38																																																																																																																																																																																																																							
	PM	108		562	75 ⁽¹⁾	31																																																																																																																																																																																																																							
	AM	118	RT ⁽¹⁾	348	48	41																																																																																																																																																																																																																							
	PM	108		333	38	39																																																																																																																																																																																																																							
Hoi Bun Road EB	AM	118	LT	389	28	58																																																																																																																																																																																																																							
	PM	108		398	29	52																																																																																																																																																																																																																							
	AM	118	SA+LT ⁽¹⁾	454	28	68																																																																																																																																																																																																																							
	PM	108		463	29	61																																																																																																																																																																																																																							
With the Proposed Development (Sensitivity Test for adopting mean rate)																																																																																																																																																																																																																													
Hoi Bun Road WB	AM	118	SA	664	84 ⁽¹⁾	38																																																																																																																																																																																																																							
	PM	108		562	75 ⁽¹⁾	31																																																																																																																																																																																																																							
	AM	118	RT ⁽¹⁾	351	48	41																																																																																																																																																																																																																							
	PM	108		340	38	40																																																																																																																																																																																																																							
Hoi Bun Road EB	AM	118	LT	389	28	58																																																																																																																																																																																																																							
	PM	108		398	29	52																																																																																																																																																																																																																							
	AM	118	SA+LT ⁽¹⁾	454	28	68																																																																																																																																																																																																																							
	PM	108		463	29	61																																																																																																																																																																																																																							
Notes: ⁽¹⁾ Junction Improvement Scheme by Other Project																																																																																																																																																																																																																													

Departmental Comments		Applicant’s Responses				
Comments of Commissioner for Transport (Contact Person: Mr. LAW Shun Chit, Tom, Tel No.: 2399 2459)						
		TABLE R2 QUEUE LENGTH FOR J2 - WAI YIP STREET / SHUN YIP STREET				

Departmental Comments		Applicant's Responses
Comments of Commissioner for Transport (Contact Person: Mr. LAW Shun Chit, Tom, Tel No.: 2399 2459)		
		Hoi Bun Road.

Departmental Comments		Applicant's Responses
Highways Department		
<p>It is noted that surrender area located along Wai Yip Street (2.3m set back area) and back alley (1.5m set back area) is proposed. For the proposed surrender, it shall only be considered if TD considers it necessary from traffic viewpoint. This office would take up the maintenance responsibility of the surrender areas in the form of footpath (or any other type of road as required by TD) provided that the following comments are complied with:-</p> <ol style="list-style-type: none"> 1. TD has agreed to the proposed surrender (of any width) for footpath widening purpose, and taken up the traffic management of the future footpath. 2. The surrender areas are up to the requirements of Transport Planning Design Manual (TPDM) and highways standard and shall be formed by the captioned lot owner(s) to the satisfaction of both TD and this Regional Office. In this regard, please request the lot owner(s) to submit the design of proposed surrender areas to both TD and this Regional Office for comment. 3. The surrender areas have to be reverted back to government land. 4. No private installations of any kind are allowed within the road reserves, including any building structure/part, private drains, sewers, waterpipes, cables etc. 		<p>Noted with thanks. The required information will be submitted at the detailed design stage as appropriate.</p>

Email dated 19th September 2025 refers:

Comments of the Kowloon District Planning Office of the Planning Department

1. In reference to HyD's comments, please evaluate whether your landscape proposal at G/F within the Wai Yip Street setback area is feasible, given the applicant's intention to surrender this area for bonus GFA.

Please be clarified that the setback area along Wai Yip Street is designated for the pure function of public passage at this stage and hence no greenery area or trees is proposed. Attached please find the relevant layout plans and Landscape Proposal updated.