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Section 16 Application for Partial Conversion of an Existing Commercial Building for Proposed 'Hotel (Student Hostel)' Use at 86 Hung To Road, Kwun Tong, Kowloon

Planning Application No. A/K14/838

Further Information 2

June 2026

Reference : PPC-PLG-10186

Responses-to-Comments

Item	Departmental Comments	Applicant's Responses
1.	**Comments from Environmental Protection Department received on 8.6.2026 (Contact Person: Ms. Jolitta CHAN, Tel: 2835 1112)**	
EPD's comments on Preliminary Environmental Review (PER) Report (Rev 3) (dated 26 May 2026)		
1	Table 2.3 and R-t-C#3: Please highlight the data of peak season ozone which exceeded AQO. Please also add a remark in the footnote of the table for annual FSP in year 2023that it did not exceed AQO (as explained under R-t-C).	Noted. **Table 2.3** has been updated.
2.	Appendix 2.1 and R-t-C#4: Please rectify the grid nos. at Appendix 2.1 which have been mixed up, e.g. the values under "45,32" should belong to "46,32".	Noted. **Appendix 2.1** has been updated accordingly.
We understand that the proposed student hostel development will not rely on opened window for ventilation and an air ventilation equipment will be provided. The fresh air intake point(s) of the air ventilation equipment will be properly located to meet the buffer distance requirement for nearby roads (e.g. 5m from Hung To Road) stipulated in Chapter 9 of the HKPSG. Please confirm with the applicant if our understanding is correct.		It is confirmed that the building will not rely on open windows for ventilation.

2.	**Comments from Environmental Protection Department received on 26.3.2026 (Contact Person: Ms. Jolitta CHAN, Tel: 2835 1112)**	
EPD's comments on Preliminary Environmental Review (PER) Report (dated 25.2.2026)		
Air Quality Impact Assessment		
1.	There are no details regarding how the existing commercial building would be constructed / renovated to the proposed student hostel. Please describe the construction activities and provide more information for assessing the potential constructional air quality impact arising from the proposed development, including but not limited to: the size of the demolition, site formation or/and excavation area, amount of excavated materials to be handled, number of dump trucks and mechanical equipment to be used per time over the work site. Please discuss the mitigation measures during the construction phase, such as dust control measures in accordance with Cap 311R Air Pollution Control (Construction Dust) Regulation. Please also review and identify if there is any nearby ASR that would be affected during the construction phase (and supplement the relevant figure, if any). Please confirm whether there are any concurrent projects in the surrounding area and if positive, their cumulative air quality impact shall be addressed.	The proposed development involves partial conversion of the existing building into a student hostel. No change to the existing building bulk will be induced. There will be no demolition of the Project Building. The Project Building will be converted to adopt mechanical ventilation systems for ventilation. **Section 1.3.3** to **Section 1.3.5** have been added accordingly. Associated discussions have also been updated.
2.	Table 2.1: (a) The new AQOs has been effective since 11 Apr 2025 (https://www.epd.gov.hk/epd/english/environmentinhk/air/air_quality_objectives/air_quality_	Noted. **Table 2.1** has been updated accordingly.

	objectives.html). Please adopt the new AQOs and incorporate the new parameters (such as new AQOs for PM2.5, PM10, NO2, Ozone at Peak Season, CO at 24hr). (b) Please add "*Number of exceedances allowed* ***Per Calendar Year***" at the end of the label of last column. (c) Please also add Notes 2 & 3 for PM10 and PM2.5, i.e., "*...Respirable suspended particulates (PM10) / Fine suspended particulates (PM2.5) means suspended particles in air with a nominal aerodynamic diameter of 10 μm / 2.5 μm or less...*".	Noted. The column has been added accordingly. Noted. The notes have been supplemented accordingly.
3.	Section 2.1: Please supplement the discussion of the buffer distance requirements for roads, chimneys and odour source stipulated in HKPSG.	Noted. The discussions of the buffer distance requirements are added as **Table 2.2**.
4.	Section 2.2: Please supplement the discussion of the future predicted background air quality by quoting PATH data which is available on SAMP (https://aqia.epd.gov.hk/).	Noted. Extracts of PATH data have been added to **Appendix 2.1**. **Section 2.2.4** has been added accordingly.
5.	Table 2.2: Please add the AQOs limit under the table for easy reference. Refer to comment #2 above, please check whether the values would exceed the new AQOs. And verify the monitoring result since some records are not correct, e.g., 2020 24hr SO2 should be 8 μg/m3 instead of 9. Please state in the footnote that CO is not measured at Kwun Tong AQMS.	Noted. The AQOs limits have been added to **Table 2.2**, now renumbered as **Table 2.3** accordingly. Pollutants exceeding the AQOs have been marked in **Bold Underline**, and footnote has been added to explain. The results have also been checked and updated where necessary.
6.	Section 2.2.6: Please include other major roads nearby the site, such as Hoi Yuen Road, Kwun Tong Bypass.	Noted. **Section 2.2.6**, now renumbered as **Section 2.2.7**, has been updated accordingly.
7.	Section 2.2.10: Please supplement a figure indicating the potential ASRs of the site e.g., openable windows and fresh air intakes of air sensitive uses.	Noted. Please see **Section 2.2.14** and **Figure 2.2** has been added accordingly.
8.	Section 2.3: We note that Kwun Tong Ferry Pier and Kwun Tong Vehicular Ferry Pier fall within the assessment area. Please measure the distance between the proposed development and the piers and check them against the 200m buffer distance requirements.	Noted. Discussions on the ferry piers have been added to **Section 2.2.11** and **Section 2.3.10**.
9.	Section 2.3.2: Please explain why the proposed student hostel is considered as an amenity area or passive recreation use. Please improve the readability of the last sentence.	Noted. **Section 2.3.2** has been updated accordingly.
10.	Table 2.3: **Please include the review of the buffer distance requirements for Hung To Road**,	Noted. **Table 2.3**, now renumbered as **Table 2.4**, has been updated

	which is critical for assessing the air quality impact to the ASRs inside the project site.	accordingly.
11.	Section 2.3.4: (a) Please confirm whether the central air-conditioning system would be provided for the proposed student hostel use and would not rely on open window / individual air conditioner at each hostel units for ventilation. (b) Referring to Comment #0 above, the buffer distance between Hung To Road should also be assessed. If each hostel unit would rely on open window / individual air conditioner at for ventilation, it appears that the buffer distance requirements under Table 3.1 of HKPSG Chapter 9 (i.e., >5m for Local Distributor) would not be complied. (c) **If the HKPSG requirements could not be fulfilled, <u>a quantitative cumulative air quality impact assessment should be conducted</u> to evaluate the potential air quality impact and to confirm the compliance of the prevailing AQOs criteria**.	The proposed building will rely on mechanical ventilation system and the windows will be sealed. Associated section have been updated accordingly. Buffer distance between Hung To Road and the Project Building has been reviewed and updated. Consider a layby is located between Hung To Road and the Project Building, a total of 7m of buffer distance is considered. Consider an adequate buffer distance is available, quantitative air quality assessment is not considered required.
12.	Section 2.3.7: Please supplement the weather conditions e.g., temperature, RH, wind data during the site visit.	Noted. The weather conditions have been added in **Section 2.2.5**.
13.	Figure 2.1: Please overlay the PATH grid. Table of Content: Please rectify the table of content for Section 4.	**Figure 2.1** has been updated accordingly.
<u>Noise Impact Assessment</u>		
1.	Sections 3.5.10, 3.5.11, Appendix 3.3: A -20dB(A) attenuation is applied for the fixed plant noise in some of the calculation. Please demonstrate how such attenuation could be achieved.	The proposed building will rely on mechanical ventilation system and the windows will be sealed. Associated section have been updated ccordingly. Discussion on fixed plant noise is not relevant and removed.
2.	Section 3.6 Traffic Noise Assessment: Under s.3.6.3, the consultant tried to demonstrate that there is no adverse traffic noise impact by simply mentioned there is separation distance between the project building and Kwun Tong bypass, but has neglected the traffic noise impact from nearby roads including such as Hung To Road and King Yip St. This approach is not sufficient to support the finding and in fact rarely seen in traffic noise assessments particularly for development projects in urban area. The consultant is advised to refer to the relevant noise standards stipulated in the HKPSG and relevant requirements including in the ProPECC PN 4/23. The consultant should clearly demonstrate that the Proposed Development could achieve full compliance with the noise standards, with mitigation measures in place, if necessary, through quantitative noise models with traffic data endorsed by TD and checked by a qualified noise modelling professional before further submission.	The proposed building will rely on mechanical ventilation system and the windows will be sealed. Associated section have been updated accordingly. Discussion on fixed plant noise is not relevant and removed.

3. Comments from Environmental Protection Department received on 24.4.2026 (Contact Person: Ms. Jolitta CHAN, Tel: 2835 1112)		
EPD's comments on Preliminary Environmental Review (PER) Report (Rev 1) (dated 9 April 2026)		
Air Quality Impact Assessment		
1	Section 1.3.5: Apart from the glass installation air ventilation system at Figure 1.3, please confirm whether all dormitory units rely on split-type air conditioning units with own air exchange system, rather than centralized air conditioning. If so, please note that these units should also be considered as fresh air intake locations.	Noted. Ventilation system shown in **Figure 1.3** is for exhaust purpose. Split type air conditioning units will be provided for the project. All the outdoor units of the split-type air conditioning units will be installed at the lane between the Project Building and Dorsett Kwun Tong, maintaining a minimum of 7m separation distance from the Hung To Road. **Figure 2.4** and associated discussions have updated accordingly.
2	Section 2.1.3 to 2.1.4 and R-t-C#2: Please present only the buffer distance requirements for air quality impact which are stipulated in Table 3.1 – "Guidelines on Usage of Open Space Site" of HKPSH Ch9, for different types of roads and chimney sources. Please remove the buffer distance requirements for other environmental aspects.	Noted. Irrelevant aspects have been removed from **Section 2.1.3** and **Table 2.2**.
3	Section 2.2.2: Please delete this section as it is not relevant.	Noted. **Section 2.2.2** has been removed accordingly.
4	Section 2.2.4, Appendix 2.1 and R-t-C#4: According to Figure 2.1, the 500m assessment area also cover PATH grids (46,32) and parts of (45,31). Please clarify. Please present only one assessment year for PATH data based on the commencement year of the proposed development and present only one level of data to represent the worst-case scenario.	Noted. PATH data for grid (45,31) and (46,32), have been added to **Appendix 2.1**. The worst level L3 at proposed completion year 2026 has been selected to represent the worst-case scenario.
5	Section 2.2.10 to 2.2.11 and R-t-C#8: Please state that the air quality impact of the ferry piers and the Kwun Tong Preliminary Treatment Works (KTPTS) would be assessed in Section 2.3.	Noted. The statement has been added to the sections, which are now renumbered as **Section 2.2.9** and **Section 2.2.10**.
6	Section 2.2.13 and Table 2.4: (a) Please specify in Table 2.4 which ASRs are for construction phase and which ASR are for operation phase. (b) Please ensure that the shortest horizontal distances between the ASRs and the proposed development are shown in Table 2.4. For example, it seems that the distance between ASR 1 and the project site boundary is less than 10m and that for ASR 2 is less than 12m. (c) Please review if there is any air sensitive use in ASR 14 which should be identified as ASR for this proposed development during construction phase.	(a) Noted. **Table 2.4** has been updated to indicate the construction phase and operational phase ASRs. (b) Noted. The horizontal distances have been checked and revised accordingly. (c) Noted. Upon review, ASR 14 has been removed.

	(d) Please provide the assessment heights of the ASRs.	(d) Noted. The assessment heights, which represent the lowest occupying floor, are given in **Table 2.4** accordingly.
7	Section 2.3 and R-t-C#1: (a) This comment about the construction phase has not been addressed properly. Please supplement the review of air quality impact during construction phase by providing more information e.g. the number of dump trucks and mechanical equipment to be used per time over the work site. (b) Please discuss the mitigation measures during the construction phase, such as dust control measures in accordance with Cap 311R Air Pollution Control (Construction Dust) Regulation if applicable. Please discuss whether there will be VOC emissions during the conversion works. (c) Please confirm whether there are any concurrent projects in the surrounding area and if positive, their cumulative air quality impact shall be addressed.	a) Noted. **Section 2.3** has been added to properly discuss the air quality impact during the construction phase. Air quality impact during operational phase are renumbered as **Section 2.4**. b) Noted. **Section 2.3.6** to **Section 2.3.12** have been updated accordingly. Contractor should ensure chemicals used for the Project, including paints and other solvents, should contain <5 grams/liter of Volatile Organic Compounds. **Section 2.3.8** has been included accordingly. c) The nearest concurrent construction work is the improvement works at Kwun Tong Ferry Pier. **Section 2.3.5** has been added to discuss the potential cumulative impact accordingly.
8	Section 2.3.4 and R-t-C#10 & 11: (a) Please be informed that with reference to Note (b) under Table 3.1 of HKPSG Ch 9, the buffer distance shall be the shortest distance from the edge of road kerb to the boundary of the proposed site. According to the Geoinfo Map published by Lands Department, the concerned layby is also a part of Hung To Road. Hence, the layby should not be excluded from buffer distance requirement. (b) Should the fresh air intake locations, particularly for the dormitory units facing Hung To Road, fail to meet the buffer distance requirements, a quantitative cumulative air quality impact assessment should be conducted to evaluate the potential air quality impact and to confirm the compliance of the prevailing AQOs criteria (c) Please critically review whether the fresh air intake locations can be relocated or central air-conditioning can be adopted such that the buffer distance requirements can be fulfilled.	a) Noted. The section, now renumbered as **Section 2.4.4**, has been updated accordingly. b) Noted. **Figure 2.4** has been updated to show the space where outdoor units should not be installed. c) Noted. The section, now renumbered as **Section 2.4.4**, has been reviewed and updated accordingly.
9	Section 2.3.8: Please provide the weather condition during the site visit e.g. temperature, RH. Please also check with regional office of EPD to see if there are any odour complaints against KTPTS to support the conclusion of "no adverse odour impact".	Noted. **Section 2.2.4 and Section 2.4.8** has been added accordingly.
10	Section 2.4 and 4.1: Please re-write the conclusions about air quality in Section 4.	Noted. The sections, now renumbered as **Section 2.5** and **Section 4.1**, have been updated accordingly.

11	Figure 2.2: (a) There is no "ASR 15" in Figure 2.2. Please check. (b) The ASRs during construction phase should be represented by their nearest locations to the proposed developments. Please revise the locations of the ASRs in Figure 2.2. (c) There is no "Project Site Boundary" in Figure 2.2. Please supplement.	a) Noted. ASR 15 has been removed from **Figure 2.2**. b) Noted. The locations have been updated accordingly. c) Noted. Project Site Boundary has been added accordingly.
Noise impact assessment		
12	While it was confirmed that the proposed development will be provided with mechanical ventilation system and will not rely on openable window for ventilation, the proposed development will not be subject to adverse traffic noise impact and fixed plant noise impact.	Noted.

4.	**Comments from Environmental Protection Department received on 15.5.2026 (Contact Person: Ms. Jolitta CHAN, Tel: 2835 1112 / Mr. Jeff Leung (PlanD), Tel: 2231 4788)**	
EPD's comments on Preliminary Environmental Review (PER) Report (Rev 3) (dated 9 April 2026)		
1	Please highlight the changes to facilitate our review.	Noted.
2.	Section 2.1.4 & Table 2.2 & R-t-C#2: The referenced roads buffer distance, under Table 1.3 of HKPSG Ch.9, are related to Noise impact assessment. Please refer to Table 3.1 of HKPSG Ch.9 instead and revise the discussion in Section 2.1.4.	Noted. **Section 2.1.3**, **2.1.4** and **Table 2.2** have been updated accordingly.
3.	Table 2.3: (a) For 24-hour PM2.5, it should be 19th highest instead of 36th. Please revise. (b) Please check whether annual PM2.5 in year 2023 exceeded AQO or it was less than AQO but shown as 15 due to rounding. (c) Please present the data for 10th highest 24-hour NO_2 and peak season ozone. (d) Note 1: Please add "per calendar year" after "Number of Exceedances Allowed".	Noted. The typo has been updated accordingly. Yearly air quality monitoring results were downloaded from the Environmental Protection Interactive Centre. The annual result agrees with the result calculated from hourly FSP data for 2023 (14.77ug/m3). As such the FSP level in 2023 is not considered exceeding the AQO. The exceedances recorded in **Table 2.3** have been marked with **Bold Underline** accordingly. Noted. **Table 2.3** has been updated accordingly Noted. The footnote has been updated accordingly.

4.	Section 2.2.3, Appendix 2.1 & R-t-C#4: Please select the PATH data at L1 instead of L3. Please highlight the data which exceeds AQOs in **Appendix 2.1**.	Noted. **Section 2.2.3** and **Appendix 2.1** have been updated accordingly.
5.	Section 2.2.7: Please revise as follows: The major sources for the air Quality impact of the Project would be the traffic emissions from Hung To Road.	Noted. **Section 2.2.7** has been updated accordingly.
6.	Section 2.2.8: Please revise as follows: No chimney was identified within the 500m assessment area.	Noted. **Section 2.2.8** has been updated accordingly.
7.	Table 2.4 & R-t-C#6 (d): The assessment heights of the ASRs should be represented by a range of heights. Please revise the table. Also, please show the land use of the ASRs e.g. commercial, industrial, etc.	Noted. **Table 2.4** has been updated accordingly.
8.	Section 2.3.5 & R-t-C#7 (c): Please show the location of the improvement works at Kwun Tong Ferry Pier in a figure.	Noted. The location of the improvement works at Kwun Tong Ferry Pier has been updated in **Figure 2.4**. The original **Figure 2.4** has been renumbered as **Figure 2.5**.
9.	Section 2.4.4, Table 2.5, Figure 2.3 & R-t-C#8: (a) In Table 2.5, please amend the distance between the project building and Hung To Road, which should not be 7m as per Section 2.4.4. (b) Figure 2.3: Please mark the 5m buffer distance from Hung To Road to demonstrate compliance with the 5m buffer distance requirement. Please also compare the 5m buffer distance of Hung To Road against the layouts of all floors to determine which windows should be sealed. Please quote Figure 2.3 in Section2.4.4.	Noted. **Table 2.5** has been updated accordingly. Noted. The 5m buffer zone and sealed windows positions have been marked on **Figure 2.3**.
10.	Section 2.4.8 and R-t-C#9: Please supplement the conclusion of no complaint records of Kwun Tong Preliminary Treatment Works in year 2021-2026.	Noted. No complaint records has been supplemented in **Section 2.4.8**.

Annex 1

Revised Preliminary Environmental Review

UMWELT CONSULTING LIMITED
23/F, On Hong Commercial Building, 145 Hennessy Road, Wan Chai, Hong Kong

Section 16 Application for Partial Conversion of an Existing Commercial Building for Proposed 'Hotel ("Student Hostel")' Use at 86 Hung To Road, Kwun Tong, Kowloon

Preliminary Environmental Review Report

9 June 2026

Revision 4

Content:

Tables:

Figures:

Appendices:

1. Introduction

1.1 Project Title

1.1.1 Application No. A/K14/838, Section 16 Application for Partial Conversion of an Existing Commercial Building for Proposed 'Hotel ("Student Hostel")' Use at 86 Hung To Road, Kwun Tong, Kowloon.

1.2 Planning Application

1.2.1 A Planning Application No. A/K14/838 was submitted to the Town Planning Board on 27 January 2026 to seek planning permission for a Partial Conversion of an Existing Commercial Building for Proposed 'Hotel ("Student Hostel")' Use at the application site ("the Project Site") at 86 Hung To Road, Kwun Tong, Kowloon.

1.3 Project Background

Statutory Land Use Zoning of the Project Site

1.3.1 The Application Site falls within an area zoned as "Other Specified Uses" annotated "Business" ("OU("B")") the Approved Outline Zoning ("OZP") Plan No. S/K14S/27, Kwun Tong ("South") ("KPA 14 Pt."). The Project Site is currently occupied by an existing 10-storey commercial building known as Rich China Center ("the Project Building"). According to the Notes of the OZP Notes for Schedule I of the "OU("B")" zone, 'Hotel' is a Column 2 use which may be permitted upon application to the Board. Hence, the partial conversion of the Building into a 'Hotel ("Student Hostel")' use requires planning permission from the Board.

Location of the Project Site

1.3.2 The location of the Project Site is given in **Figure 1.1**. The layout of the Project Building is given in **Figure 1.2**.

Proposed Development

1.3.3 The proposed development involves partial conversion of the existing building into a student hostel. No change to the existing building bulk will be induced.

1.3.4 There will be no demolition of the Project Building. The Project Building will be converted to adopt mechanical ventilation systems for ventilation.

1.3.5 The proposed student hostel will adopt sealed windows and does not rely on openable windows for ventilation. A glass installation air ventilation system will be used for the air ventilation of the Project Building. An example of this type of ventilation equipment is shown in **Figure 1.3.**

1.4 Purpose of this Proposal

1.4.1 Comment on the planning application from the Environmental Protection Department ("EPD") was received. The following comments were received:

a) On air quality, the applicant should confirm whether the central air-conditioning system would be provided for the proposed student hostel use and would not rely on open window for ventilation. Please demonstrate with drawing("s") that no air sensitive

uses including openable window and/or fresh air intakes of any air sensitive uses would be situated within the minimum buffer distance under Table 3.1 at Chapter 9 of the Hong Kong Planning Standards and Guidelines ("HKPSG") for various emissions sources, e.g. roads, industrial chimneys, odour. [Reference:]. The Applicant and their consultants shall carry out site survey and desktop review to identify the emission sources in the vicinity of the Project Site. Please confirm whether there would be any chimney emission from the proposed development. If yes, the buffer distance requirements in HKPSG shall also be complied with. If the HKPSG buffer distance requirements cannot be fulfilled, quantitative cumulative impact assessment should be required to evaluate the potential air quality impact to confirm the compliance of the prevailing AQOs criteria.

b) On noise issue, if the proposed student hostel will rely on openable window for air ventilation, it will be affected by road traffic noise and fixed plant noise impacts and in this case, the applicant should demonstrate that there is no insurmountable noise problem for the proposed development to achieve full compliance with the noise standards/requirements stipulated in the HKPSG or Noise Control Ordinance ("NCO") with the necessary mitigation measures in place. The applicant should carry out a noise impact assessment ("NIA") to assess potential noise impacts and demonstrate that with implementation of noise mitigation measures, the proposed development will not be subject to adverse noise impacts.

1.4.2 This Preliminary Environmental Review Report ("PER") assessed the air and noise level of environment exposed by the proposed development, to ensure that the proposed development would not have unfavourable environmental conditions.

2. Air Quality Impact Assessment

2.1 Legislation, Standards and Guidelines

2.1.1 Air Quality assessment has been conducted in accordance to the following guidelines:

a) Air Pollution Control Ordinance ("Cap. 311"); and
b) Hong Kong Planning Standards and Guidelines ("HKPSG"), Chapter 9

2.1.2 CAP 311 set forth the Air Quality Objectives ("AQOs") for project planning purposes. The AQOs are shown in **Table** 2.1:

Table 2.1: Air Quality Objectives Taken Effect from 11 Apr 2025

Pollutant	Averaging time	Concentration limit[1], µg/m^3	Number of exceedances allowed Per Calendar Year
Sulphur dioxide	10-minute	500	3
	24-hour	40	3
Respirable suspended particulates	24-hour	75	9
	Annual	30	Not applicable
Fine suspended particulates	24-hour	37.5	18
	Annual	15	Not applicable
Nitrogen dioxide	1-hour	200	18
	24-hour	120	9
	Annual	40	Not applicable
Ozone	8-hour	160	9
	Peak Season	100	Not applicable
Carbon monoxide	1-hour	30,000	0
	8-hour	10,000	0
	24-hour	4,000	0
Lead	Annual	0.5	Not applicable

Notes:
1 All measurements of the concentration of gaseous air pollutants, i.e., SO2, NO2, O3 and CO, are to be adjusted to a reference temperature of 293 Kelvin and a reference pressure of 101.325 kilopascal.
2 Respirable suspended particulates (PM10) means suspended particles in air with a nominal aerodynamic diameter of 10 µm or less.
3 Fine suspended particulates (PM2.5) means suspended particles in air with a nominal aerodynamic diameter of 2.5 µm or less.

2.1.3 In addition to the AQOs, Chapter 9 of HKPSG provides planning guidelines for new developments to ensure the new development would not be exposed to excessive environmental impacts through allowing minimum horizontal buffer distances from air pollution emission sources. The recommended buffer distances from potential air pollution emission sources (industrial chimneys, and roads) to Air Sensitive Receivers ("ASRs") (e.g., residential developments, schools, hospitals) are given in Table 3.1 in Chapter 9 of HKPSG and is summarized in **Table** 2.2 below:

Table 2.2 Summary of Recommended Buffer Distances for Residential Areas and Sensitive Uses

Polluting Uses	Sensitive Uses	Buffer Distance
Industrial chimneys	Sensitive uses	If chimney identified within 500m, consult EPD
Trunk roads and Primary Distributor	Active and passive recreation uses	＞20m
	Passive recreational uses	3 - 20m
	Amenity areas	＜3m
District distributors	Active and passive recreational uses	＞10m
	Passive recreational uses	＜10m
Local distributors	Active and passive recreational uses	＞5m
Under Flyovers	Passive recreational uses Passive recreational use	＜5m

Notes:
1. For any industrial chimney located within 500m of sensitive uses, prior consultation with the EPD is mandatory.

2.1.4 Chapter 9 of HKPSG proposed that for residential uses (sensitive uses), it should have a buffer distance of 500m from any identified industrial chimney. For roads, worst case scenario (Active Recreational uses) is adopted and hence at least 20m buffer distance from Trunk Roads and Primary Distributors, 10m buffer distance from District Distributors, and 5m buffer distance from Local Distributors should be allowed.

2.2 Description of the Environment

Baseline Air Quality Data Collection

2.2.1 Baseline air quality data for the Project Site is adopted from the latest long-term monitoring results published by the Environmental Protection Department ("EPD") of Hong Kong. The data is derived from the EPD's fixed air quality monitoring station closest to the project site, covering a 12-month continuous monitoring period to reflect the typical air quality conditions in the Kwun Tong area. Key pollutants including Sulphur dioxide ("SO2"), Respirable suspended particulates ("PM10"), Fine suspended particulates ("PM2.5"), Nitrogen dioxide ("NO2"), and Ozone ("O3") were recorded at Kwun Tong Air Quality Monitoring Station.

2.2.2 The summary of air quality monitoring data in Kwun Tong over the past five years is given in **Table 2.2.**

Table 2.3: Historical Air Quality Monitoring Results at Kwun Tong Air Quality Monitoring Station

Pollutant	Averaging time	Highest Value [1]	AQOs limit	2024	2023	2022	2021	2020
Sulphur dioxide	10-minute	4th	500	21	29	19	24	24
	24-hour	4th	40	7	10	11	8	8
Respirable suspended particulates ("PM10")	24-hour	10th	75	56	57	49	72	68
	Annual	--	30	24	26	24	**31**	**32**

Pollutant	Averaging time	Highest Value [1]	AQOs limit	2024	2023	2022	2021	2020
Fine suspended particulates ("PM2.5")	24-hour	19th	37.5	31	28	31	34	34
	Annual	--	15	14	15	14	**17**	**16**
Nitrogen dioxide	1-hour	19th	200	144	147	145	164	153
	24-hour	10th	120	72	75	83	97	83
	Annual	--	40	**42**	**41**	**45**	**49**	**43**
Ozone	8-hour	10th	160	142	136	148	136	126
	Peak Season	--	100	**184**	**227**	**149**	**190**	**162**

Notes:

1. nth highest value refers to the Number of Exceedances Allowed per calendar year as per the AQOs. If the nth highest value does not exceed the AQO, the parameter comply with the AQO.
2. Text in **Bold Underline** denoted exceedance of respective AQO criteria.
3. Peak Season was defined as "average of daily maximum 8-hour mean O3 concentration in the six consecutive months with the highest six-month running-average O3 concentration
4. Current AQOs have been effective since 11 April 2025. Values calculated from the air quality monitoring results for the years prior to the current AQO were used to compared against the latest AQO
5. CO is not measured at Kwun Tong AQMS
6. Annual Fine Suspended Particulates ("PM2.5") in year 2023 did not exceed AQOs limit due to rounding

2.2.3 The 500m assessment area covering PATH grids (45,32), (46,32) and parts of (45,31). The worst year and elevation for the available PATH data have been extracted and presented in **Appendix 2.1**. In the predicted year of 2026, Ozone was observed to exceed the AQOs for both daily maximum 8-hour average and peak season.

Existing Site Condition

2.2.4 Site visit had been conducted on 26th January 2026 to identify any sources of potential air quality nuisance within the proximity of the Project Site. The weather conditions during site visit are summarized as follows:

a) Temperature: 18 - 22°C;
b) Relative Humidity: 65 - 75%
c) Wind Condition: East to Northeast wind, 10 - 18 km/h

2.2.5 The Project Site is located within the urban area of Hung To Road, King Yip Street, and Wai Yip Street. The area is located in the core area of the Kwun Tong Business Area, which is a mixed industrial and commercial zone.

2.2.6 The major roads within the study area include Hung To Road, King Yip Street, Hoi Yuen Road, Kwun Tong Bypass and Wai Yip Street.

Major Air Quality Impact Sources

2.2.7 The major sources for the air quality impact of the Project would be the traffic emissions from Hung To Road.

2.2.8 No chimney was identified within the 500m assessment area.

2.2.9 Kwun Tong Preliminary Treatment Works, which would have odour impact towards the Project, was identified at the opposite side of Wai Yip Street, at about 120m from the

Project Building. Discussion of the impact from the Kwun Tong Preliminary Treatment Works will be given in **Section 2.3**.

2.2.10 Kwun Tong Ferry Pier and Kwun Tong Vehicular Ferry Pier were also located within 500m study area. The piers would have air quality impact towards the Project due to the operation of ferries. Discussion of the impact from the piers will be given in **Section 2.3**.

2.2.11 **Figure 2.1** shows the 500m study area from the Project Building with the identified potential air quality impact sources.

Air Sensitive Receivers

2.2.12 **Table** 2.4 indicates the Air sensitive receivers identified during the site inspection, their locations are presented in **Figure 2.2**.

Table 2.4: Identified Air Sensitive Receivers

Air Sensitive Receiver	Description	Distance from the Site Boundary, m	Assessment height, m	Construction Phase	Operational Phase	Land use
ASR 1	Ray Center	0	7 – 53.2	✓	--	Industrial
ASR 2	Dorsett Kwun Tong	1.2	7 - 54.4	✓	--	Commercial
ASR 3	EGL	19.1	1.5 - 125	✓	--	Commercial
ASR 4	Contempo	21.8	9 - 49.8	✓	--	Commercial
ASR 5	Yue Xiu Industrial Building	25.3	7 - 49	✓	--	Industrial
ASR 6	90 Hung To Road	51.4	1.5 - 35.7	✓	--	Industrial
ASR 7	Kras Asia Industrial Building	51.9	7 - 47.1	✓	--	Industrial
ASR 8	80 Hung To Road	28.2	7 - 51.9	✓	--	Industrial
ASR 9	Joint Venture Factory Building	81.7	1.5 - 53	✓	--	Industrial
ASR 10	Koho	84.4	7 - 51.4	✓	--	Commercial
ASR 11	Rays-Lemmi	135.3	9 - 51.0	✓	--	Commercial
ASR 12	Lee On Industrial Building	135.1	1.5 - 51.6	✓	--	Industrial
ASR 13	Lu Plaza	108.4	1.5 - 83.5	✓	--	Industrial
ASR 14	Project Building	--	9 - 41	--	✓	Residential

2.2.13 Assessment heights are defined at the first occupied floor of the building to the top of the building.

2.2.14 The Project Building is considered an ASR as there are rooms with air sensitive use within the Project Building. **Figure 2.3** shows the air intake locations and the air sensitive use within the Project Building on a typical floor.

2.3 Air Quality Impact Assessment during Construction Phase

2.3.1 The Project Building is proposed to be repurposed to be partially converted into a student hostel. No change to the existing building bulk will be induced during the conversion.

2.3.2 During the construction phase, main works are conducted indoors for internal conversion. Works including wall demolition and installation of air conditioning systems are anticipated. No significant demolition is necessary. Only handheld Powered Mechanical Equipment ("PME") are required for indoor works.

2.3.3 Outdoor works are necessary for the installation of the outdoor units of the air conditioning units. During outdoor works, handheld PME including electric drills are necessary.

2.3.4 Inert Construction and Demolition ("C&D") material would be generated during the construction phase. However, as the works are mainly conversion works, excessive amount of rock, soil, sand, aggregate, rubble, boulder, masonry, concrete, asphalt and brick etc are not anticipated. It is predicted that no more than 1 trip of truck is required during the construction phase to remove the C&D Material.

Cumulative Impact

2.3.5 During the site visits, the nearest concurrent work is the improvement works at Kwun Tong Ferry Pier. As the concurrent work is shielded from the Project Site by Manulife Financial Centre, cumulative impact is not anticipated. The location of the improvement works is shown in **Figure 2.4**.

Mitigation Measures

2.3.6 During the construction phase, mitigation measures should be implemented to minimize air quality impacts. Appropriate mitigation measures are gives as following sections.

2.3.7 During construction phase, air pollutants would be generated from the following construction activities and equipment:

a) Exhaust from the Powered Mechanical Equipment ("PME");
b) Fugitive dust emission due to exposed earth and / or stockpiles
c) Fugitive dust emission during excavation and or earth movement;
d) Fugitive dust emission during cement mixing on-site; and
e) Fugitive dust emission during vehicle movement.

2.3.8 Use of diesel is not recommended as the project has electricity power supply.

2.3.9 Contractor should ensure chemicals used for the Project, including paints and other solvents, should contain <5 grams/liter of Volatile Organic Compounds.

2.3.10 Proper dust control, including watering, covering etc, should be implemented during outdoor and indoor works.

2.3.11 Construction dust generated will be governed by the APCO CAP 311R. All relevant mitigation measures under the CAP 311R should be implemented during the construction phase.

2.3.12 By proper implementation of relevant mitigation measures under the APCO CAP 311 and other regulations during the construction phase, significant dust emissions and air pollutants would not be anticipated.

2.4 Air Quality Impact Assessment during Operational Phase

2.4.1 During operational phase, air quality assessment is conducted in accordance with the requirements stipulated in Chapter 9 of HKPSG, covering the operational phase of the project.

2.4.2 The Project Building is proposed to be repurposed to be partially converted into a student hostel. Chapter 9 of HKPSG has not specified a requirement on buffer distance between a residential development and roads in terms of avoidance of air quality impacts. Hence, refence has been made to the guidelines on usage of Open Space Site, as consider the hostel is primary used for residential uses, dwellers would stay within Project Building for rest and other passive activities, e.g. studying, reading, etc, which is comparable to passive recreation use.

Road and Highways

2.4.3 Table 3.1 of Chapter 9 of HKPSG stated the recommended buffer distance between the proposed development and the major roads within proximity of the Project Building.

Table 2.5: Buffer Distance between the Project Building and Local Major Roads

Major Road	Type of Road	Recommended Buffer Distance	Distance between the Project Building and the Road
Kwun Tong Bypass	Expressway	> 20m (Active and Passive Recreation Uses), <3m (Amenity Areas)	110m
Wai Yip Street	District Distributor	>10m (Active and Passive Recreation Uses)	110m
Hoi Yuen Road	District Distributor	>10m (Active and Passive Recreation Uses)	190m
Hung To Road	Local Distributor	>5m (Active and Passive Recreation Uses)	3.5m
King Yip Street	Local Distributor	>5m (Active and Passive Recreation Uses)	50m

2.4.4 The Project Building is located next to Hung To Road. The separation distance from the road kerb is about 3.5m. To provide the necessary buffer distance of at least 5m, windows facing Hung To Road and within 5m from the road kerb will be sealed. Ventilators shown in **Figure 1.3** will be used for exhaust. The hostel will be ventilated by split type air conditioners, and associated outdoor units will be installed outside the 5m buffer from the road kerb of Hung To Road. **Figure 2.5** shows the illustration of space where outdoor units should not be installed.

2.4.5 The Project Building has sufficient buffer distance from the local major roads, as such the Project Building would comply with the guidelines stipulated in Table 3.1 of Chapter 9 of HKPSG.

Industrial Areas

2.4.6 Table 3.1 of Chapter 9 of HKPSG stated the recommended difference in height between industrial chimney exit and the site.

2.4.7 As no chimney exit were identified during the site visit conducted on 26thJanuary 2026, the Project Building would not be exposed to air pollution generated by chimney exits.

Sewage Treatment Works

2.4.8 Kwun Tong Preliminary Treatment Works is located at the opposite side of Wai Yip Street and is about 120m from the Project Building. Site visit conducted on 26th January 2026 has identified no adverse odor, showed the sewage treatment works has no adverse odor impact towards the Project Building. Records of environmental complaints of the Kwun Tong Preliminary Treatment Works is supplemented in **Appendix 2.2.** No complaint has been received against subject premises from 2021-2026.

Kwun Tong Ferry Pier and Kwun Tong Vehicular Ferry Pier

2.4.9 Kwun Tong Ferry Pier is located around 315m away from the Project Site whereas Kwun Tong Vehicular Ferry Pier is located at about 390m away from the Project Site. These two facilities are located outside the 200m buffer distance of the Project Site.

2.5 Conclusion

2.5.1 By proper implementation of relevant mitigation measures under the APCO CAP 311 and other regulations during the construction phase, significant dust emissions and air pollutants would not be anticipated.

2.5.2 Potential pollution sources within the proximity of the Project Building have been identified. The Project Building will maintain sufficient buffer distance by sealing of windows and relocation of outdoor units from the potential pollution sources and would not been affected by the identified pollution sources.

3. Noise Impact Assessment

3.1 Legislation, Standards and Guidelines

3.1.1 Noise Impact assessment has been conducted in accordance to the following guidelines:

a) Noise Control Ordinance ("NCO") (Cap.400);
b) Technical Memorandum for the Assessment of Noise from Places other than Domestic Premises, Public Places or Construction Sites ("IND-TM"); and
c) Hong Kong Planning Standards and Guidelines("HKPSG"), Chapter 9.

3.2 Noise Sensitive Receivers within the Project Building

3.2.1 The proposed student hostel will adopt sealed windows and does not rely on openable windows for ventilation. As such the Project Building would not be exposed to fixed plant noise and traffic noise impact during operational phase. No noise sensitive receiver within the Project Building is therefore identified.

3.2.2 The 300m study area and of the Project Building is shown in **Figure 3.1**.

3.3 Description of the Environment

3.3.1 The Project Building is located within the industrial area of Kwun Tong. The area is an urban area with heavy traffic. Nearby major roads including Kwun Tong Bypass and Wai Yip Street.

3.4 Fixed Plant Noise and Traffic Noise Assessment

3.4.1 The proposed student hostel will adopt sealed windows and does not rely on openable windows for ventilation. As such the Project Building would not be exposed to fixed plant noise and traffic noise impact during operational phase.

3.5 Conclusion

3.5.1 The proposed student hostel will adopt sealed windows and does not rely on openable windows for ventilation. As such the Project Building would not be exposed to fixed plant noise and traffic noise impact during operational phase.

4. Conclusion

4.1 Air Quality

4.1.1 By proper implementation of relevant mitigation measures under the APCO CAP 311 and other regulations during the construction phase, significant dust emissions and air pollutants would not be anticipated.

4.1.2 Potential pollution sources within the proximity of the Project Building have been identified. The Project Building will maintain sufficient buffer distance by sealing of windows and relocation of outdoor units from the potential pollution sources and would not been affected by the identified pollution sources.

4.2 Noise

4.2.1 The proposed student hostel will adopt sealed windows and does not rely on openable windows for ventilation. As such the Project Building would not be exposed to fixed plant noise and traffic noise impact during operational phase.

UMWELT CONSULTING LIMITED
23/F, On Hong Commercial Building, 145
Hennessy Road, Wan Chai, Hong Kong

Figures

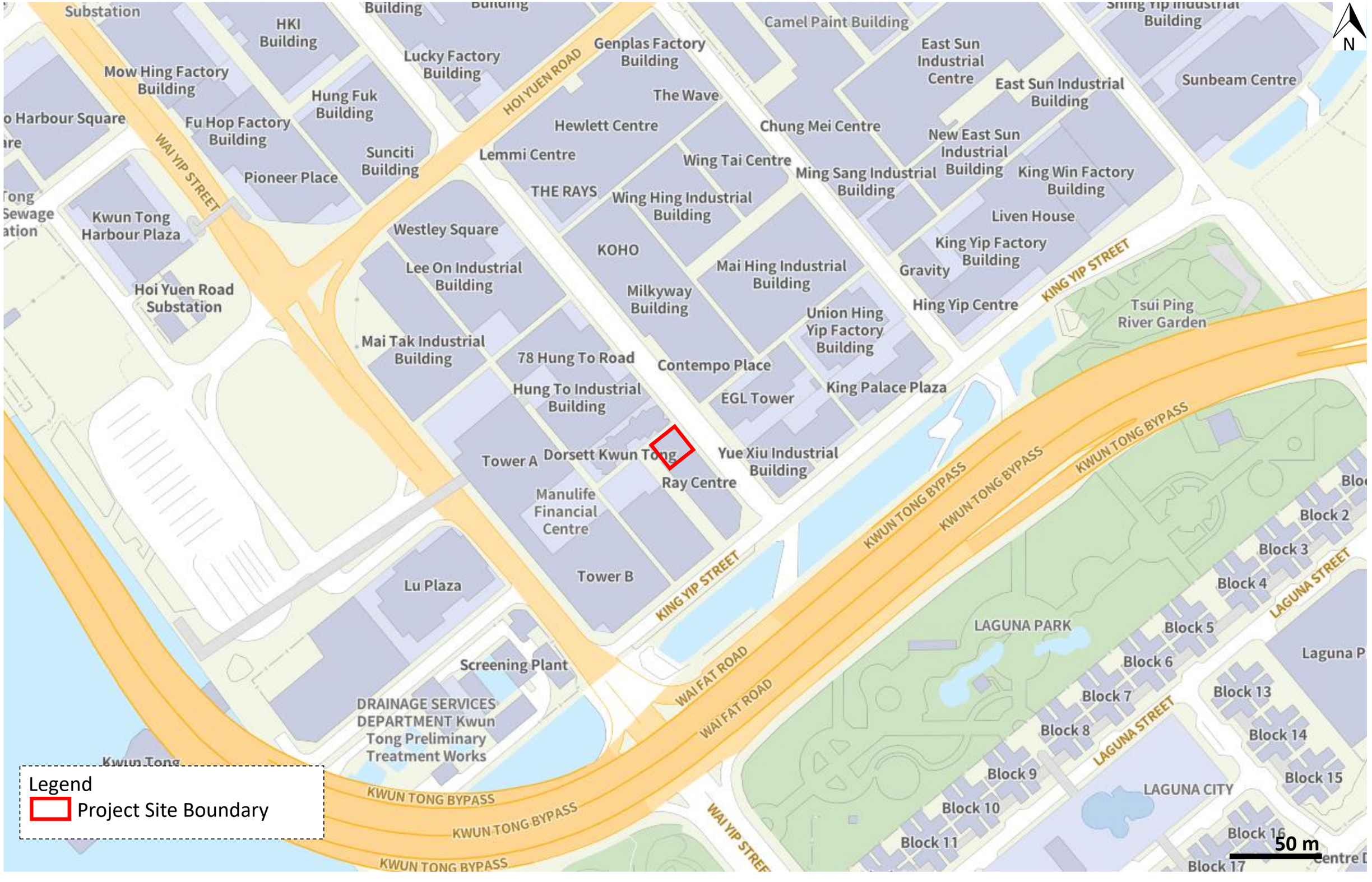

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Figure 1.1: Location of the Project Site

Map Source: (GeoInfo Map)

HUNG TO ROAD (18.3mW)

PAVEMENT

STUDENT DORMITORY AREA
STUDENT DORMITORY SUPPORTING FACILITIES AREA (AREA: 3s.m., GFA ACCOUNTABLE)
CORRIDOR, STAIRCASE AND LIFT
NON-STUDENT DORMITORY AREA

DEVELOPMENT PARAMETERS

SITE AREA	= 464.461 s.m.
PROPOSED FLOOR AREA – NON-DOMESTIC PART	= 3818.761 s.m.
PLOT RATIO	= 8.222
SITE COVERAGE	= 79.97%
BUILDING HEIGHT	= 36.72 m
NO. OF STOREY	= 10
NO. OF STUDENT HOSTEL ROOMS	= 110
– SINGLE ROOMS	= 37
– TWIN ROOMS	= 73
NO. OF BED SPACES	= 183
NO. OF PARKING SPACES AND LOADING / UNLOADING SPACES	
ACCESSIBLE CARPARK	= 1
LIGHT GOODS VEHICLES	= 1
SUPPORTING FACILITIES AREA (GFA ACCOUNTABLE)	= 626 s.m.
SUPPORTING FACILITIES AREA (EXEMPTED GFA)	= 38 s.m.

GFA SUMMARY

FLOOR	EXISTING GFA (s.m.)	PROPOSED GFA (s.m.)
G/F	344.065	349.827[1]
1/F	464.461	445.461
2/F	442.442	423.442
3/F	371.433	371.433
4/F	371.433	371.433
5/F	371.433	371.433
6/F	371.433	371.433
7/F	371.433	371.433
8/F	371.433	371.433
9/F	371.433	371.433
TOTAL	3850.999	3818.761

1. GFA OF SHOP AND CAFE (INCLUDING TOILETS) = 197.508s.m.
GFA OF HOSTEL AREA = 152.319 s.m.

GENERAL NOTES
1. DO NOT SCALE DRAWINGS, DIMENSIONS GOVERN.
2. ALL DIMENSIONS ARE IN MILLIMETERS UNLESS NOTED OTHERWISE.
3. ALL DIMENSIONS SHALL BE VERIFIED ON SITE BEFORE PROCEEDING WITH THE WORK.
4. ARCHITECT SHALL BE NOTIFIED IN WRITING OF ANY DISCREPANCIES.

2026.6.16

Project:
SECTION 16 APPLICATION FOR PARTIAL CONVERSION OF AN EXISTING COMMERCIAL BUILDING FOR PROPOSED 'HOTEL (STUDENT HOSTEL)' USE AT 86 HUNG TO ROAD, KWUN TONG, KOWLOON

Drawing Title: G/F PLAN

Drawing No.: GP-01

Architect:
L&N Architects Ltd.
Rooms 1203-1204, 12/F Belgian Bank Building, 721-725 Nathan Road, Kowloon
Tel: (852) 3422 3082, Fax: (852) 3428 2269

1/F GFA : 445.461 s.m.

DORMITORY NO.	AREA (INCLUDING SHOWER ROOM) (m^2)	NO. OF BED SPACE
1	9.0	1
2	9.3	1
3	9.1	1
4	9.6	1
5	13.2	2
6	24.2	2
7	17.4	2
8	10.5	2
9	11.7	2
10	16.0	2
11	19.7	2
12	19.1	2
TOTAL	**168.8**	**20**

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2026.6.12

Project:
SECTION 16 APPLICATION FOR PARTIAL CONVERSION OF AN EXISTING COMMERCIAL BUILDING FOR PROPOSED 'HOTEL (STUDENT HOSTEL)' USE AT 86 HUNG TO ROAD, KWUN TONG, KOWLOON

Drawing Title: 1/F PLAN

Drawing No.: GP-02

Architect:
L&N Architects Ltd.
Rooms 1203-1204, 12/F Belgian Bank Building, 721-725 Nathan Road, Kowloon
Tel: (852) 3422 3082, Fax: (852) 3428 2269

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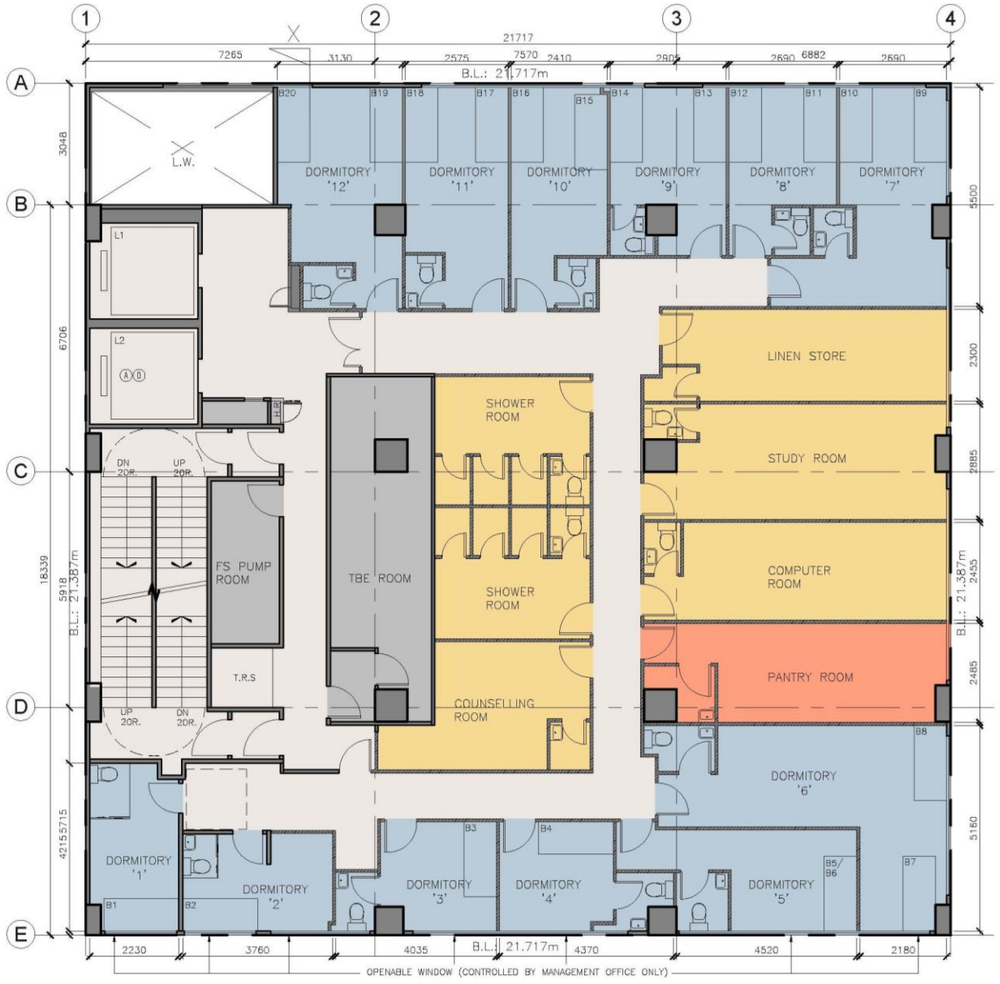
UMWELT CONSULTING LIMITED

Figure 1.2a: Layout of the Project Building Plan - Ground Floor & First Floor

2/F GFA : 423.442 s.m.

DORMITORY NO.	AREA (INCLUDING SHOWER ROOM) (m^2)	NO. OF BED SPACE
1	9.0	1
2	9.2	1
3	9.2	1
4	9.6	1
5	13.2	2
6	24.2	2
7	17.4	2
8	10.5	2
9	11.7	2
10	13.0	2
11	14.3	2
12	15.7	2
TOTAL	**157.0**	**20**

- STUDENT DORMITORY AREA
- STUDENT DORMITORY SUPPORTING FACILITIES AREA (AREA: 96s.m., GFA ACCOUNTABLE)
- STUDENT DORMITORY SUPPORTING FACILITIES AREA (AREA: 19s.m., EXEMPTED GFA)
- CORRIDOR, STAIRCASE AND LIFT
- NON-STUDENT DORMITORY AREA



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2026.6.12

Project:
SECTION 16 APPLICATION FOR PARTIAL CONVERSION OF AN EXISTING COMMERCIAL BUILDING FOR PROPOSED 'HOTEL (STUDENT HOSTEL)' USE AT 86 HUNG TO ROAD, KWUN TONG, KOWLOON

Drawing Title: 2/F PLAN

Drawing No.: GP-03

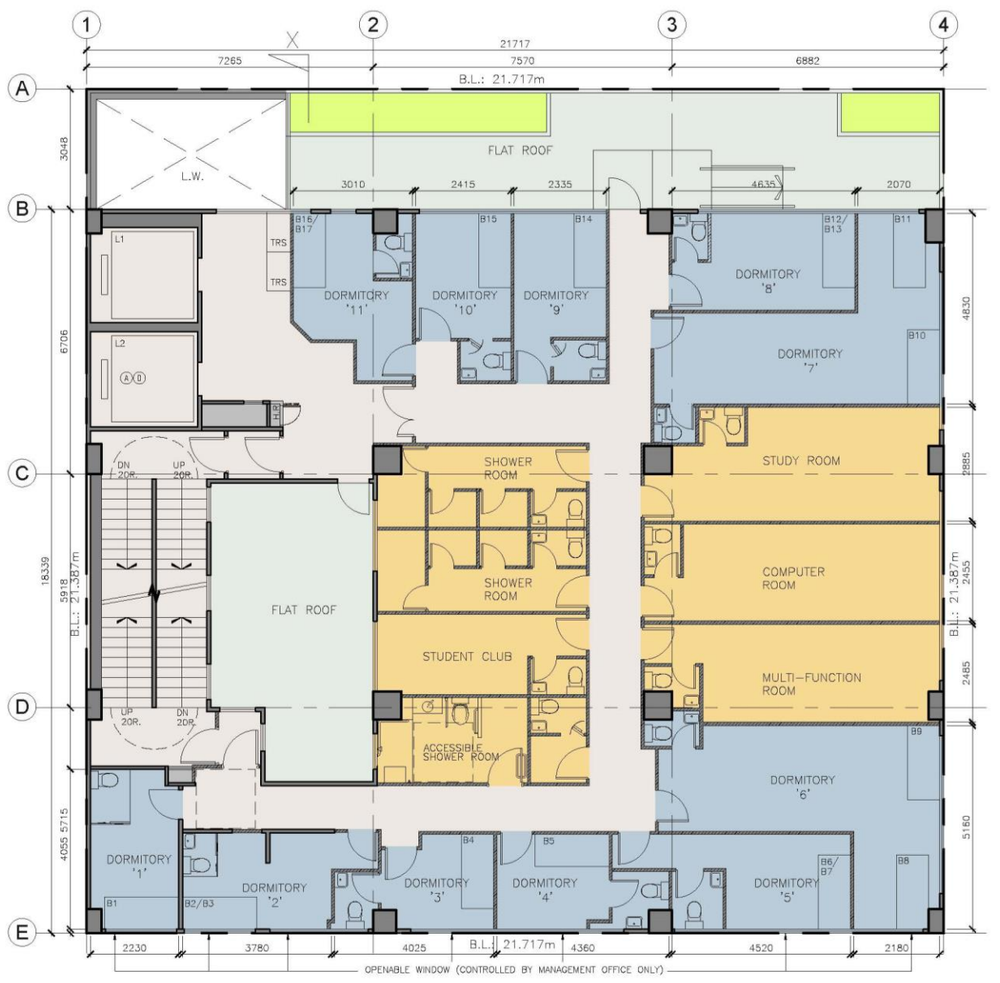
Architect:

楔安建築師有限公司
L&N Architects Ltd.
Rooms 1203-1204, 12/F Belgian Bank Building, 721-725 Nathan Road, Kowloon
Tel: (852) 3422 3082, Fax: (852) 3428 2269

3/F GFA : 371.433 s.m.

DORMITORY NO.	AREA (INCLUDING SHOWER ROOM) (m^2)	NO. OF BED SPACE
1	8.8	1
2	10.3	2
3	7.9	1
4	8.8	1
5	12.2	2
6	24.9	2
7	22.7	2
8	11.4	2
9	9.9	1
10	9.0	1
11	10.7	2
TOTAL	**136.6**	**17**

- STUDENT DORMITORY AREA
- STUDENT DORMITORY SUPPORTING FACILITIES AREA (AREA: 81s.m., GFA ACCOUNTABLE)
- CORRIDOR, STAIRCASE AND LIFT
- FLAT ROOF AND CANOPY
- GREENERY (9.0 s.m.)
- NON-STUDENT DORMITORY AREA



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2026.6.16

Project:
SECTION 16 APPLICATION FOR PARTIAL CONVERSION OF AN EXISTING COMMERCIAL BUILDING FOR PROPOSED 'HOTEL (STUDENT HOSTEL)' USE AT 86 HUNG TO ROAD, KWUN TONG, KOWLOON

Drawing Title: 3/F PLAN

Drawing No.: GP-04

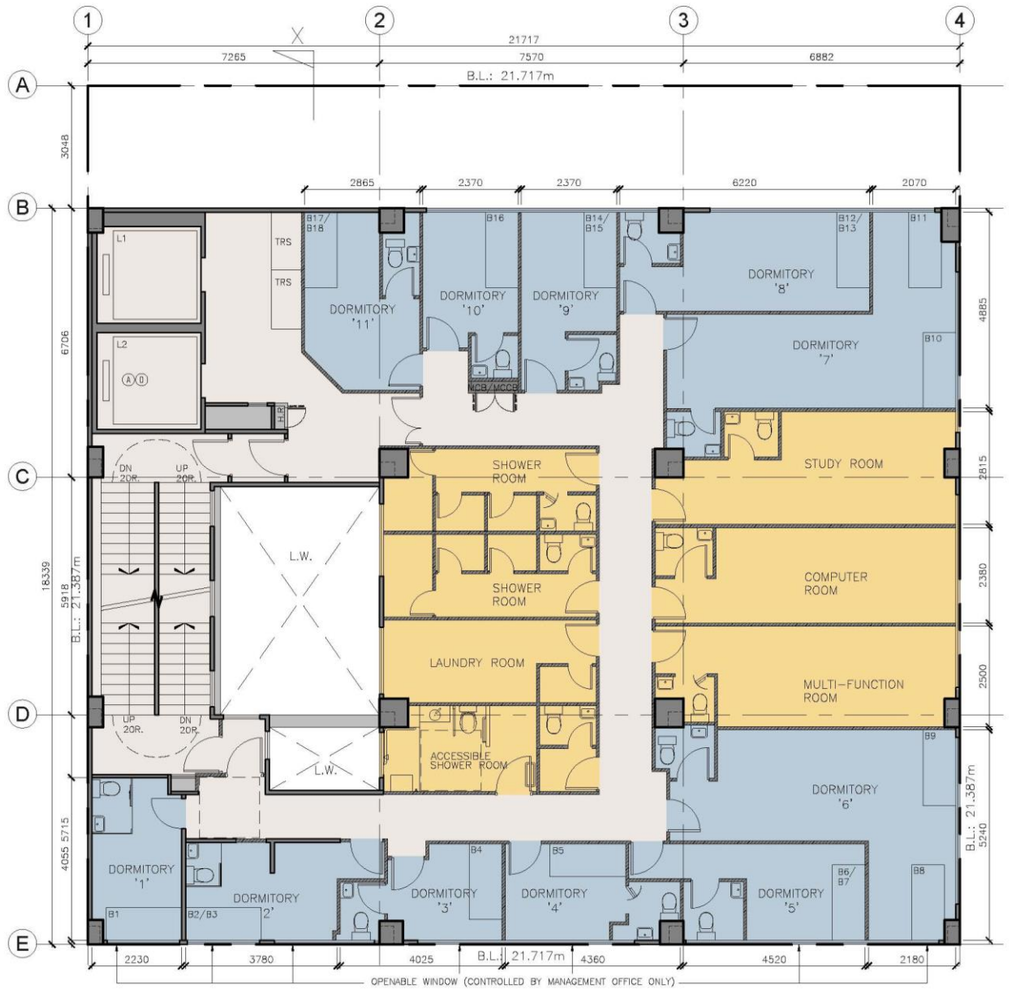
Architect:

楔安建築師有限公司
L&N Architects Ltd.
Rooms 1203-1204, 12/F Belgian Bank Building, 721-725 Nathan Road, Kowloon
Tel: (852) 3422 3082, Fax: (852) 3428 2269

Figure 1.2b: Layout of the Project Building- 2/F & 3/F

4/F–6/F GFA (EACH STOREY): 371.433 s.m.

DORMITORY NO.	AREA (INCLUDING SHOWER ROOM) (m^2)	NO. OF BED SPACE
1	8.8	1
2	10.3	2
3	7.9	1
4	8.9	1
5	12.0	2
6	25.4	2
7	23.4	2
8	15.0	2
9	10.4	2
10	8.9	1
11	11.9	2
TOTAL	**142.9**	**18**



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2026.6.12

Project:
SECTION 16 APPLICATION FOR PARTIAL CONVERSION OF AN EXISTING COMMERCIAL BUILDING FOR PROPOSED 'HOTEL (STUDENT HOSTEL)' USE AT 86 HUNG TO ROAD, KWUN TONG, KOWLOON

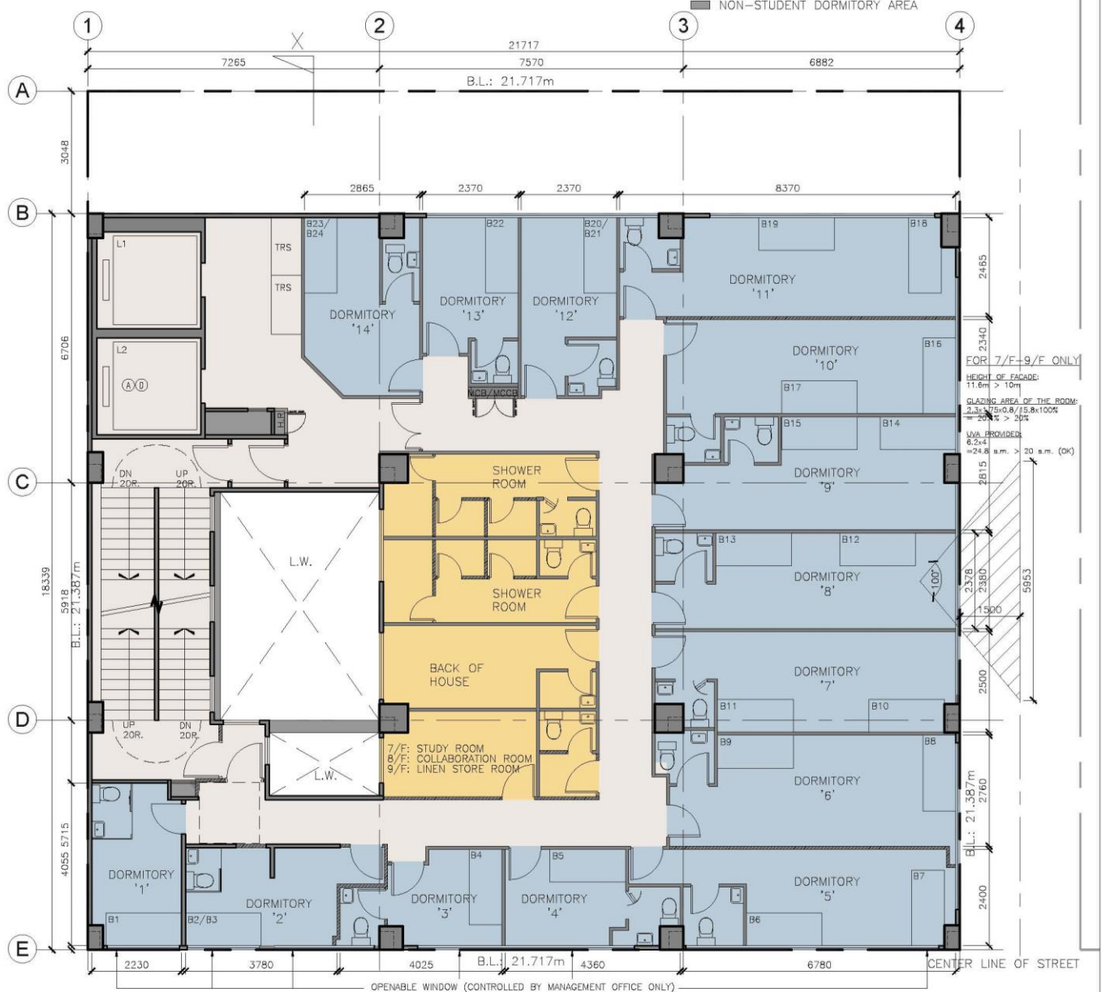
Drawing Title: 4/F - 6/F PLAN

Drawing No.: GP-05

Architect:
樑安建築師有限公司
L&N Architects Ltd.
Rooms 1203-1204, 12/F Belgian Bank Building, 721-725 Nathan Road, Kowloon
Tel: (852) 3422 3082, Fax: (852) 3428 2269

7/F–9/F GFA (EACH STOREY): 371.433 s.m.

DORMITORY NO.	AREA (INCLUDING SHOWER ROOM) (m^2)	NO. OF BED SPACE
1	8.8	1
2	10.3	2
3	7.9	1
4	8.9	1
5	17.2	2
6	20.1	2
7	17.9	2
8	17.8	2
9	18.5	2
10	18.4	2
11	20.0	2
12	10.4	2
13	8.9	1
14	11.9	2
TOTAL	**197.0**	**24**



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2026.6.12

Project:
SECTION 16 APPLICATION FOR PARTIAL CONVERSION OF AN EXISTING COMMERCIAL BUILDING FOR PROPOSED 'HOTEL (STUDENT HOSTEL)' USE AT 86 HUNG TO ROAD, KWUN TONG, KOWLOON

Drawing Title: 7/F - 9/F PLAN

Drawing No.: GP-06

Architect:
樑安建築師有限公司
L&N Architects Ltd.
Rooms 1203-1204, 12/F Belgian Bank Building, 721-725 Nathan Road, Kowloon
Tel: (852) 3422 3082, Fax: (852) 3428 2269

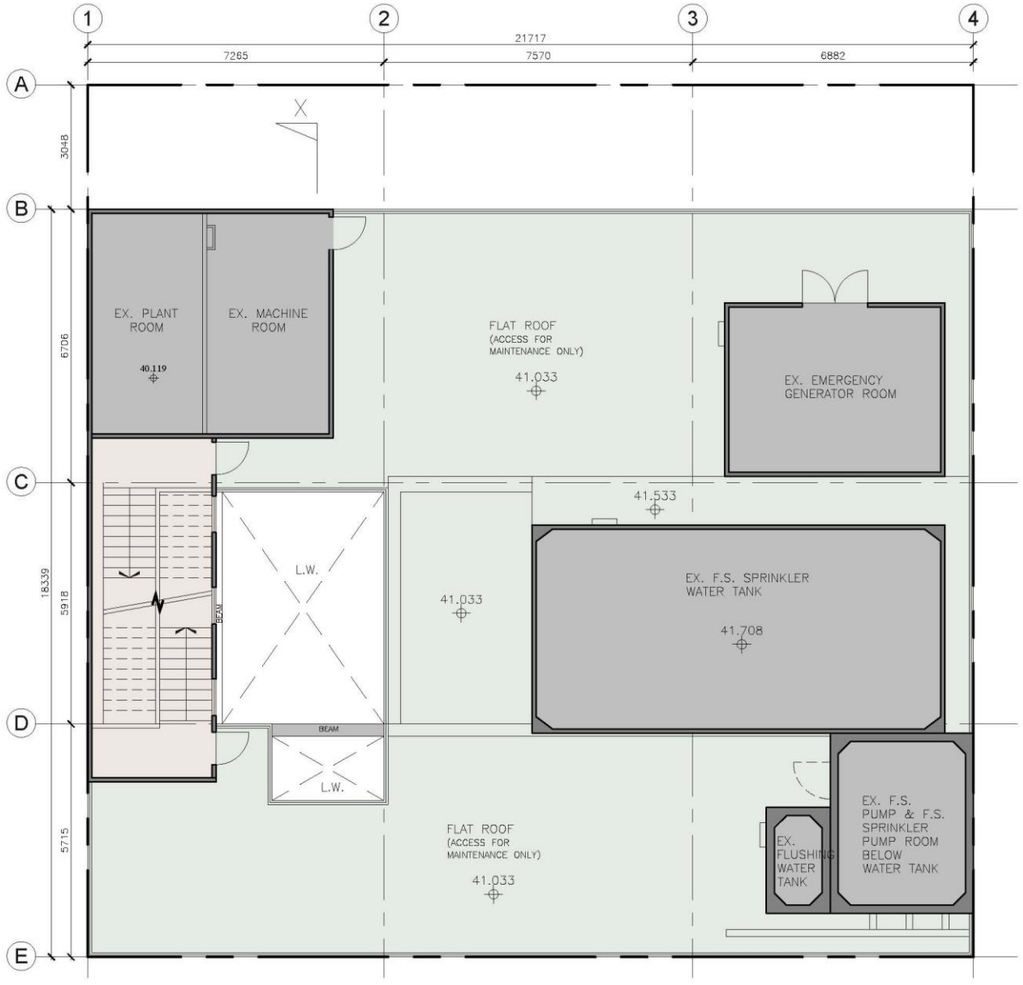
Figure 1.2c: Layout of the Project Building- 4/F to 9/F

CALCULATION OF ROOF TOP OF BUILDING

TOTAL AREA OF ROOF TOP ANCILLARY STRUCTURES OF BUILDING: 178 s.m.
THE ROOF AREA OF THE FLOOR BELOW (i.e. 9/F): 371.433 s.m.

-> % OF ALL THE ENCLOSED STRUCTURES ON ROOF TOP OF BUILDING IS 48% OF THE ROOF AREA OF THE FLOOR BELOW

CORRIDOR, STAIRCASE AND LIFT
FLAT ROOF
NON-STUDENT DORMITORY AREA



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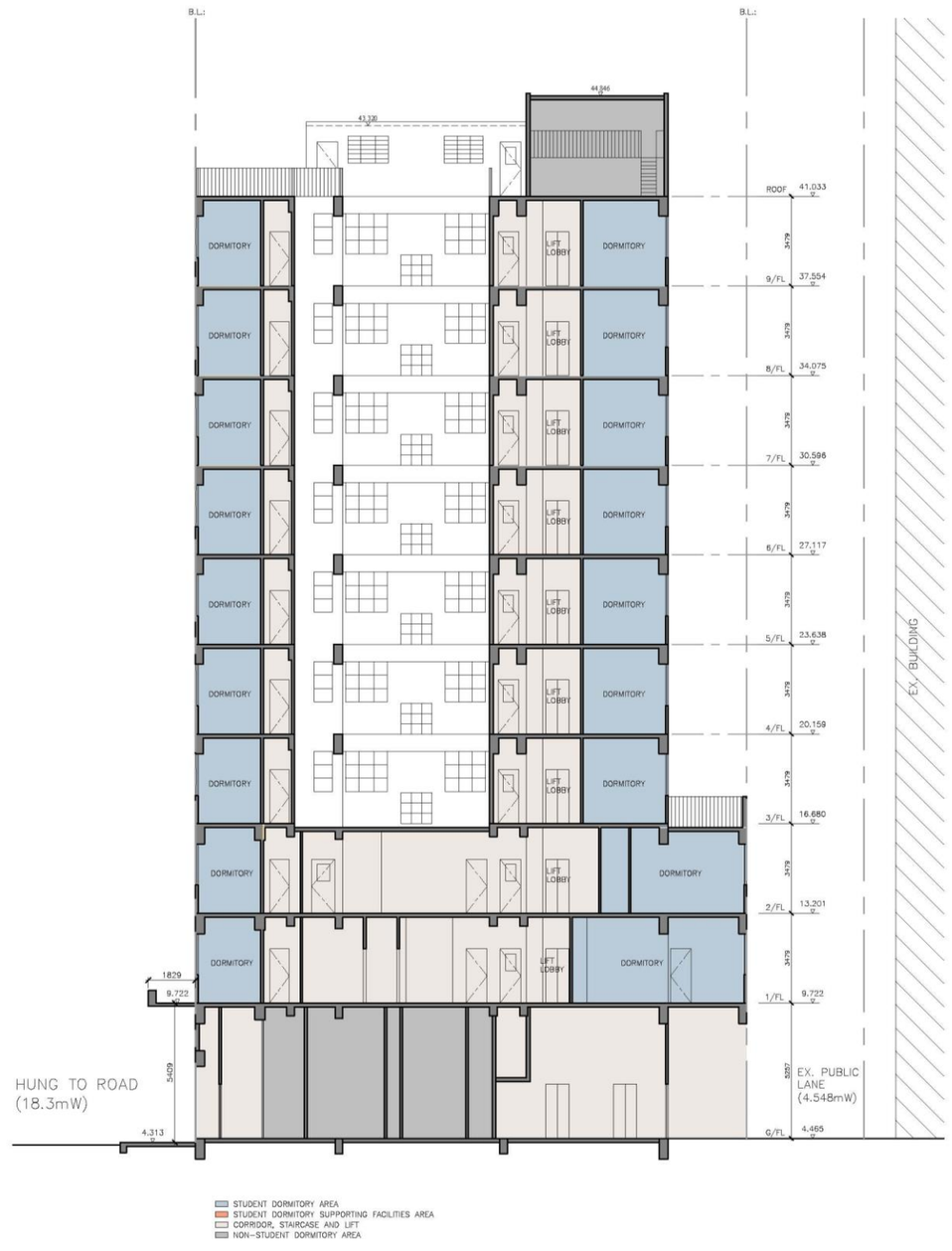
2026.6.12

Project:	Drawing Title:	Drawing No.:	Architect:
SECTION 16 APPLICATION FOR PARTIAL CONVERSION OF AN EXISTING COMMERCIAL BUILDING FOR PROPOSED 'HOTEL (STUDENT HOSTEL)' USE AT 86 HUNG TO ROAD, KWUN TONG, KOWLOON	R/F PLAN	GP-07	梁安建築師有限公司 L&N Architects Ltd. Rooms 1203-1204, 12/F Belgian Bank Building, 721-725 Nathan Road, Kowloon Tel: (852) 3422 3082, Fax: (852) 3428 2269



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2026.6.12

Project:	Drawing Title:	Drawing No.:	Architect:
SECTION 16 APPLICATION FOR PARTIAL CONVERSION OF AN EXISTING COMMERCIAL BUILDING FOR PROPOSED 'HOTEL (STUDENT HOSTEL)' USE AT 86 HUNG TO ROAD, KWUN TONG, KOWLOON	SECTION X	GP-08	梁安建築師有限公司 L&N Architects Ltd. Rooms 1203-1204, 12/F Belgian Bank Building, 721-725 Nathan Road, Kowloon Tel: (852) 3422 3082, Fax: (852) 3428 2269

Figure 1.3: Example of the Air Ventilation Equipment used for the Project Building

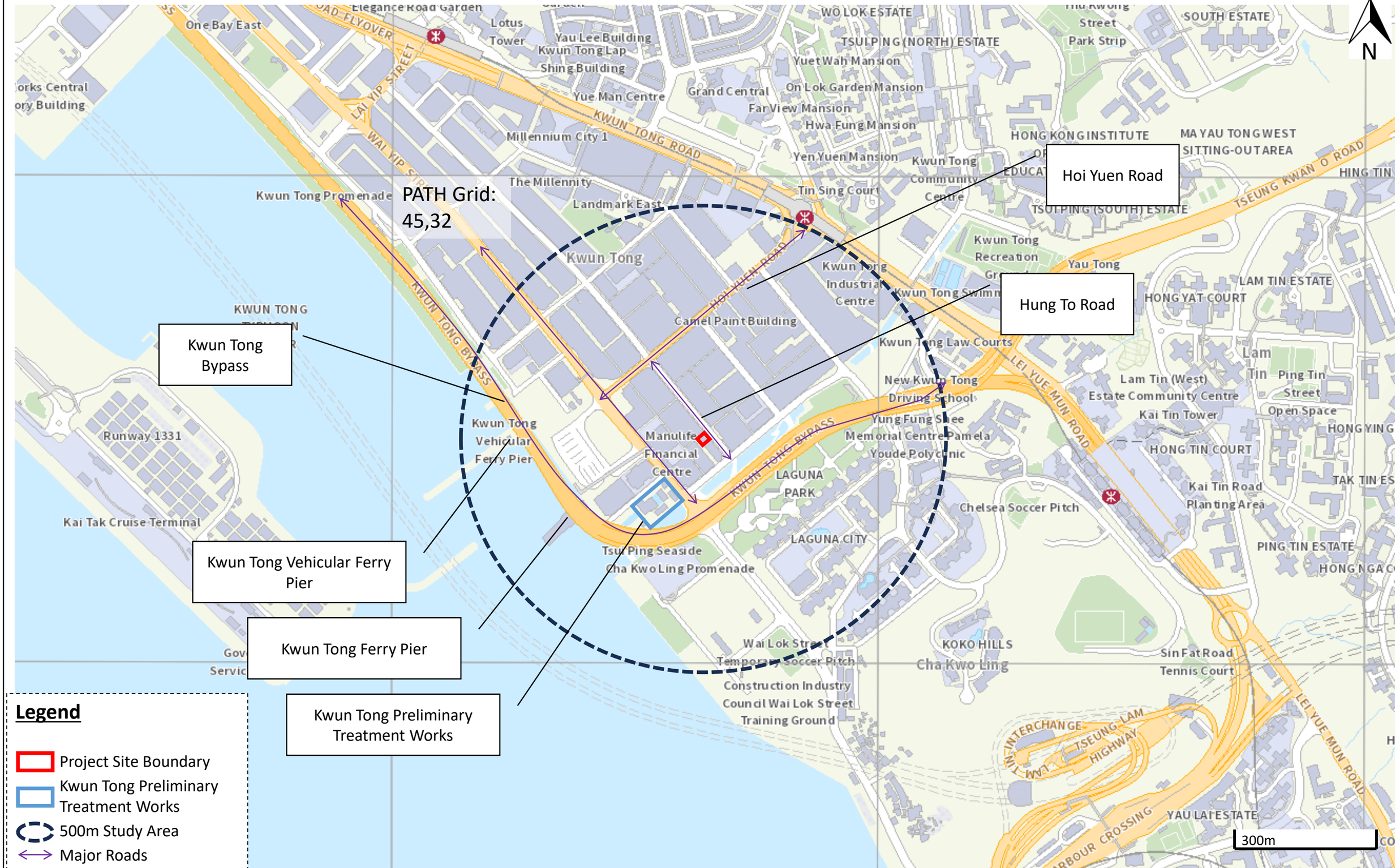


Figure 2.1: 500m study area from the Project Building and Identified Potential Air Quality Impact Sources
Map Source: (https://aqia.epd.gov.hk/)

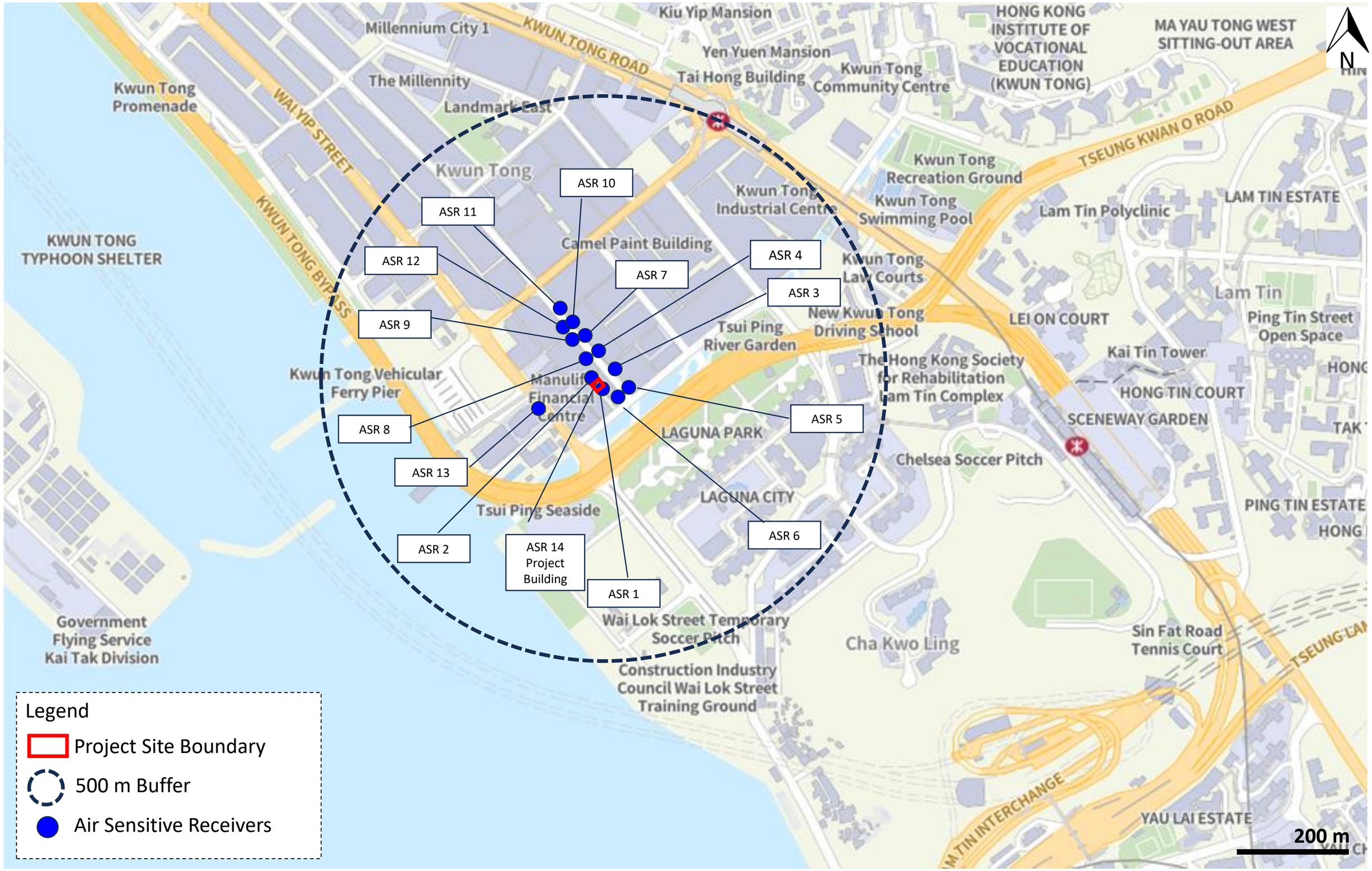
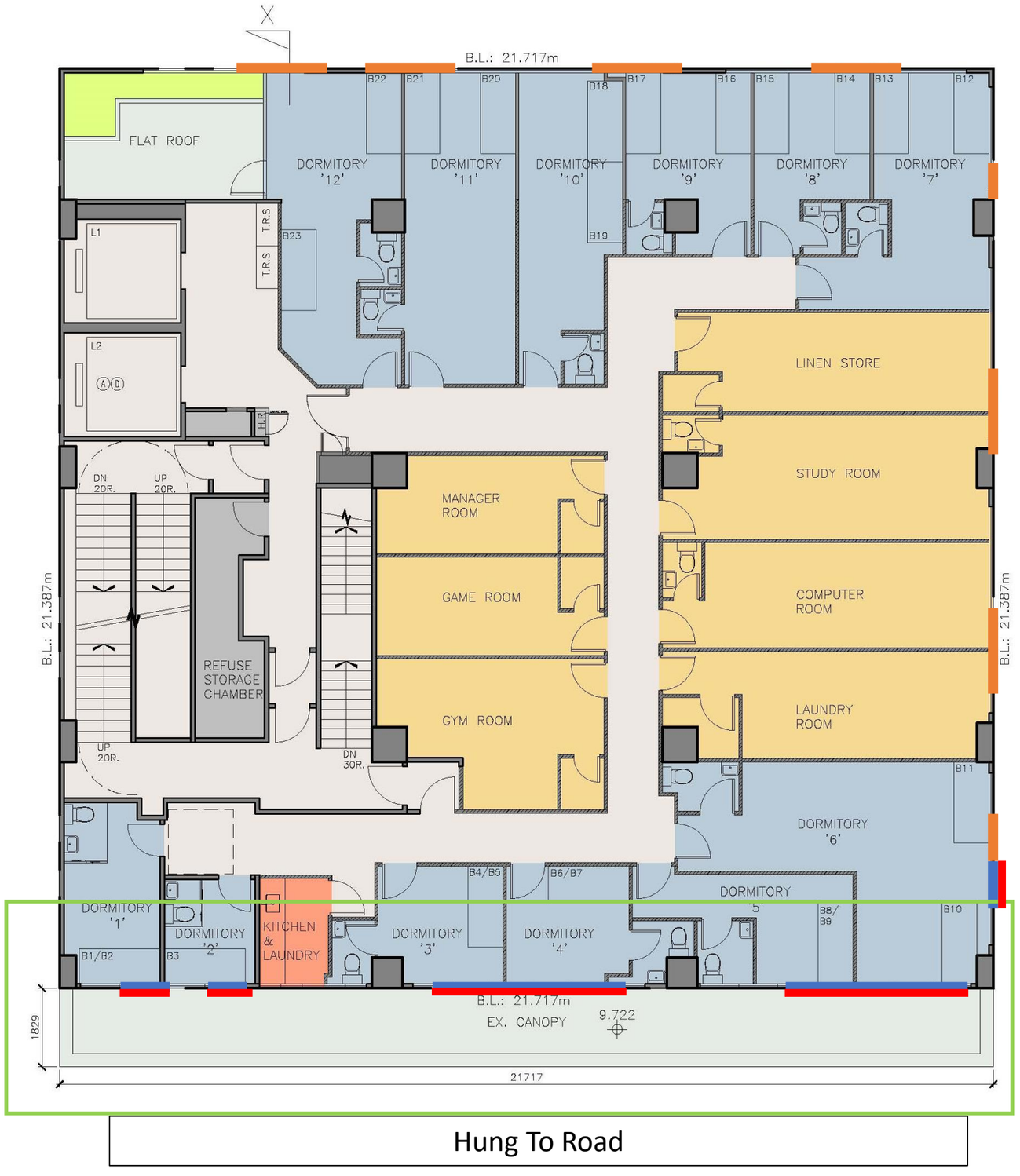


Figure 2.2: Identified Air Sensitive Receivers

Map Source: (GeoInfo Map)



Hung To Road

Legend

- Air Intake Location
- Air Intake Location (Sealed)
- Windows should be sealed
- 5m buffer distance

Room with Air Sensitive Use:

- Dormitory
- Common Area

UMWELT 奧維環境顧問有限公司 UMWELT CONSULTING LIMITED

Figure 2.3: Air Intake Location and Sensitive Use within the Project Building

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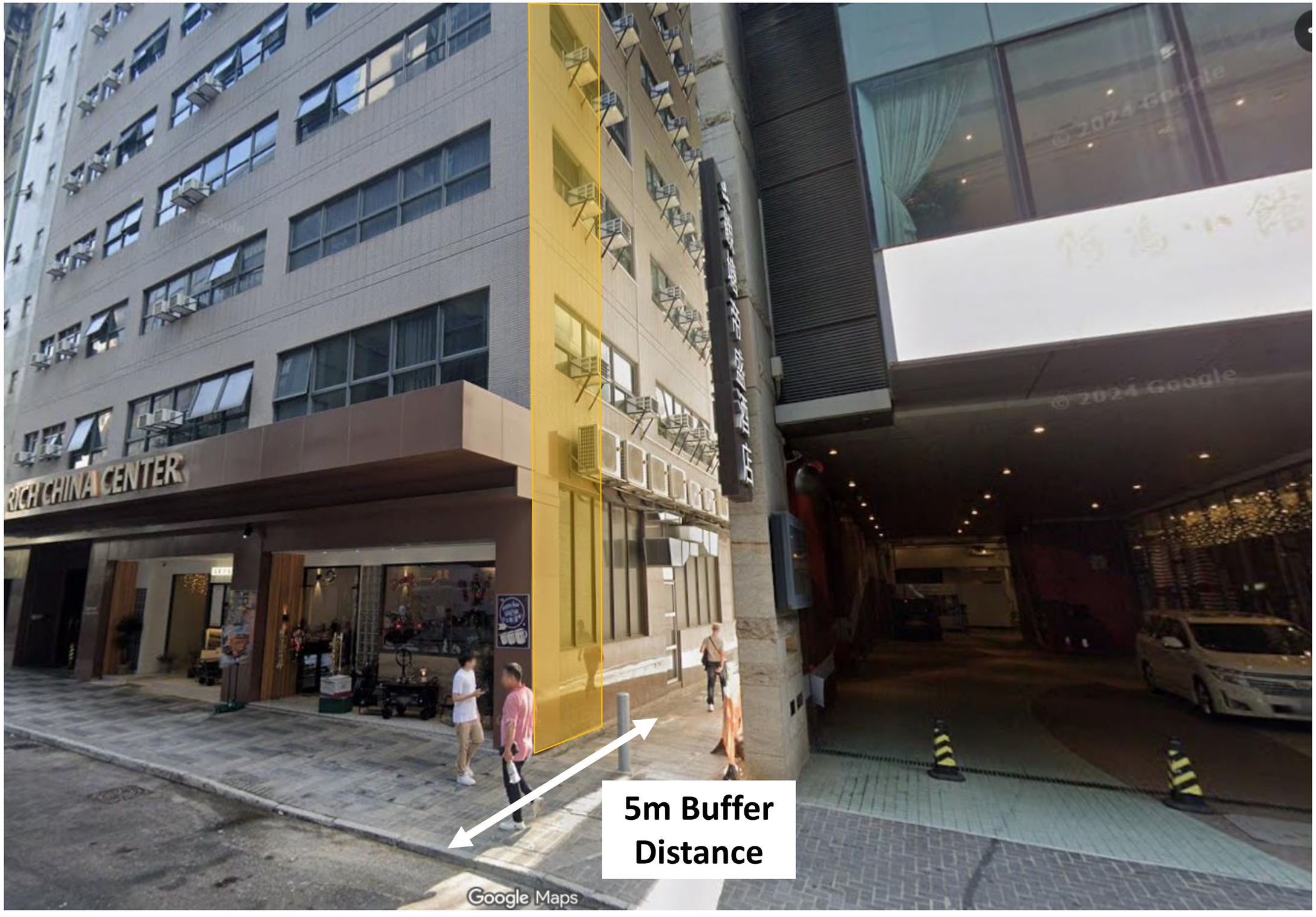
Figure 2.4: Location of the improvement works at Kwun Tong Ferry Pier

Map Source: (GeoInfo Map)



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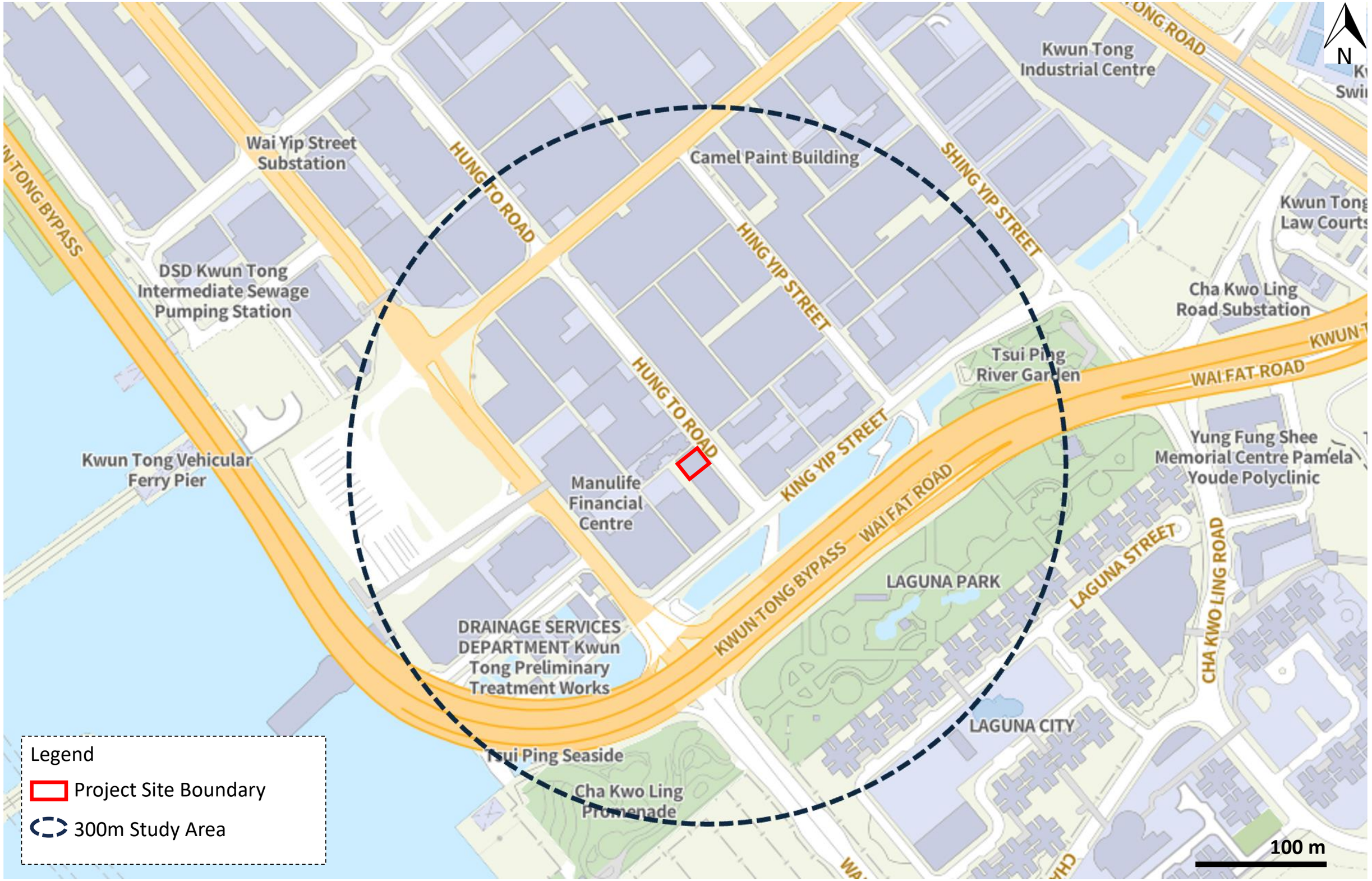
UMWELT CONSULTING LIMITED

Figure 2.5: Illustration of Space Where Outdoor Units Should not be Installed



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UMWELT CONSULTING LIMITED

Figure 3.1: 300m study area with location of Noise Sensitive Receivers (NSR)
Map Source: (GeoInfo Map)

UMWELT CONSULTING LIMITED
23/F, On Hong Commercial Building, 145
Hennessy Road, Wan Chai, Hong Kong

Appendix 2.1
Extracted PATH Data

Appendix 2.1
Extracted PATH Data
Source: https://aqia.epd.gov.hk/

Year: 2026

Level: L1 (0m - 17m)

Pollutant	Averaging Time	AQO	Data Summary	Grid: 46,32	Grid: 45,32	Grid: 45,31
RSP	24-hour	75 (9)	10th Exceedance	56.55 0	57.04 0	55.24 0
	Annual	30	-	21.52	21.55	20.66
FSP	24-hour	37.5 (18)	19th Exceedance	34.51 12	34.34 10	32.98 7
	Annual	15	-	13.51	13.55	12.79
NO2	1-hour	200 (18)	19th Exceedance	88.96 0	91.58 0	87.52 0
	24-hour	120 (9)	10th Exceedance	39.63 0	41.19 0	39.28 0
	Annual	40	-	16.43	17.82	16.72
SO2	10-Min	500 (3)	4th Exceedance	25.36 0	23.03 0	25.09 0
	24-hour	40 (3)	4th Exceedance	7.64 0	7.59 0	7.61 0
O3	8-Hour	160 (9)	10th Exceedance	**176.87** 21	**176.83** 21	**178.31** 25
	Peak Season	100	-	**122.08**	**121.52**	**123.77**
CO	1-Hour	30000 (0)	1st Exceedance	580.79 0	584.06 0	581.54 0
	8-Hour	10000 (0)	1st Exceedance	559.95 0	563.67 0	557.11 0
	24-Hour	4000 (0)	1st Exceedance	533.92 0	534.89 0	532.71 0

NOTE:
Number in bracket denotes the number of exceedances allowed for the year.
Number in **Bold Underline** denoted exceedance of respective AQO criteria.

UMWELT CONSULTING LIMITED
23/F, On Hong Commercial Building, 145 Hennessy Road, Wan Chai, Hong Kong

Appendix 2.2
Records of Environmental Complaints for the Kwun Tong Preliminary Treatment Works

Request Complaints of Kwun Tong Preliminary Treatment Works

Herrick YW HO/EPD <herrickho@epd.gov.hk> 29 April 2026 at 09:56
To: "Yan Fei, Samuel Yeung" <samuelyeung@umwelt.consulting>
Cc: Po Chung Ivan Ting <ivanting@umwelt.consulting>, Melanie Cassaillou <melaniecassaillou@umwelt.consulting>, "Wing Sze, Wincy Sin" <wincysin@umwelt.consulting>, "E[RE]31/EPD" <e-re31@epd.hksarg>

Dear Samuel,

Thanks for your email on 28 Apr 2026.

According to our records, NO complaint has been received against subject premises from 2021 – 2026.

Thanks & Regards,

Herrick HO / CI(RE)3

EPD

2117 7551

From: Yan Fei, Samuel Yeung <samuelyeung@umwelt.consulting>
Sent: Tuesday, April 28, 2026 5:02 PM
To: Herrick YW HO/EPD <herrickho@epd.gov.hk>
Cc: Po Chung Ivan Ting <ivanting@umwelt.consulting>; Melanie Cassaillou <melaniecassaillou@umwelt.consulting>; Wing Sze, Wincy Sin <wincysin@umwelt.consulting>
Subject: Request Complaints of Kwun Tong Preliminary Treatment Works

Dear Herrick sir,

We are the environmental consultant employed by the project proponent for conducting an Environmental Assessment for the "Proposed ‘Hotel (“Student Hostel”)’ Use at 86 Hung To Road" in the Kwun Tong area of the Regional East.

Of particular interests is whether there is any information regarding historical complaint(s) received in the past five years (2021-2026) on the environmental issue (i.e. odour nusiance compaints etc.) (if any) of the request for Information of environmental complaints of the following facilities (figure as attached):

Kwun Tong Preliminary Treatment Works

If there are odour complaints related to each of the above facilities, we would be much appreciated if you would provide us the year of the number of the complaints between 2021 to 2026 for the above facilities.

We would be grateful if there is any additional information including date of complaint, affected area, as well as any

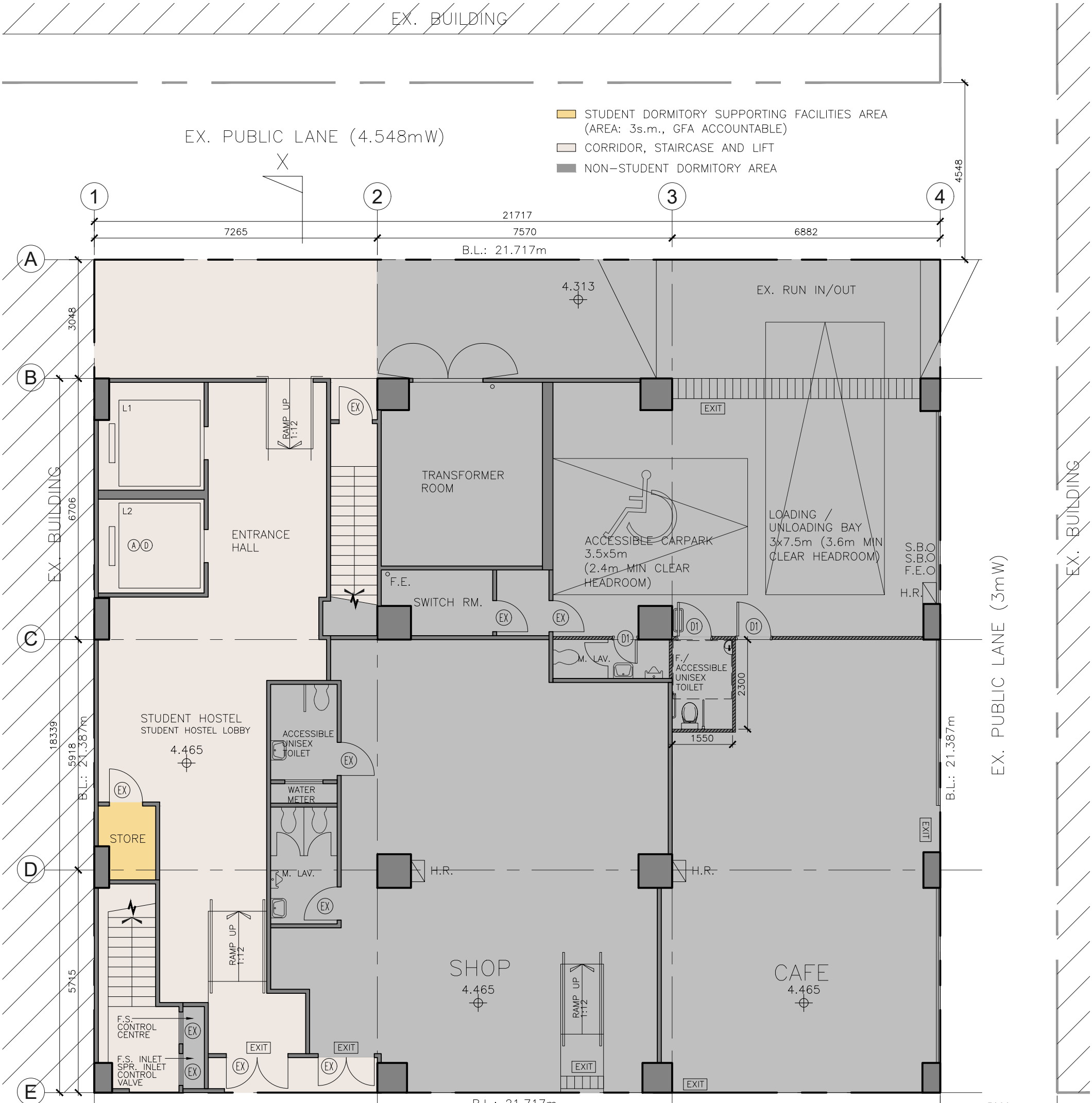
identification of the odour source(s) and any mitigation measures / improvements of the odour source(s), if necessary, have been implemented after receiving the complaints(s).

Should you have any queries, please do not hesitate to contact me at Tel: 3756 9590. Thanks for your attention.

[Quoted text hidden]

Annex 2

Revised Layout Plan



4.313

HUNG TO ROAD (18.3mW)

PAVEMENT

- STUDENT DORMITORY AREA
- STUDENT DORMITORY SUPPORTING FACILITIES AREA (AREA: 3s.m., GFA ACCOUNTABLE)
- CORRIDOR, STAIRCASE AND LIFT
- NON-STUDENT DORMITORY AREA

GENERAL NOTES
1. DO NOT SCALE DRAWINGS. DIMENSIONS GOVERN.
2. ALL DIMENSIONS ARE IN MILLIMETERS UNLESS NOTED OTHERWISE.
3. ALL DIMENSIONS SHALL BE VERIFIED ON SITE BEFORE PROCEEDING WITH THE WORK.
4. ARCHITECT SHALL BE NOTIFIED IN WRITING OF ANY DISCREPANCIES.

DEVELOPMENT PARAMETERS

SITE AREA	= 464.461 s.m.
PROPOSED FLOOR AREA – NON-DOMESTIC PART	= 3818.761 s.m.
PLOT RATIO	= 8.222
SITE COVERAGE	= 79.97%
BUILDING HEIGHT	= 36.72 m
NO. OF STOREY	= 10
NO. OF STUDENT HOSTEL ROOMS	= 110
– SINGLE ROOMS	= 37
– TWIN ROOMS	= 73
NO. OF BED SPACES	= 183
NO. OF PARKING SPACES AND LOADING / UNLOADING SPACES	
ACCESSIBLE CARPARK	= 1
LIGHT GOODS VEHICLES	= 1
SUPPORTING FACILITIES AREA (GFA ACCOUNTABLE)	= 626 s.m.
SUPPORTING FACILITIES AREA (EXEMPTED GFA)	= 38 s.m.

GFA SUMMARY

FLOOR	EXISTING GFA (s.m.)	PROPOSED GFA (s.m.)
G/F	344.065	349.827[1]
1/F	464.461	445.461
2/F	442.442	423.442
3/F	371.433	371.433
4/F	371.433	371.433
5/F	371.433	371.433
6/F	371.433	371.433
7/F	371.433	371.433
8/F	371.433	371.433
9/F	371.433	371.433
TOTAL	3850.999	3818.761

1. GFA OF SHOP AND CAFE (INCLUDING TOILETS) = 197.508s.m.
GFA OF HOSTEL AREA = 152.319 s.m.

2026.6.16

Project:
SECTION 16 APPLICATION FOR PARTIAL CONVERSION OF AN EXISTING COMMERCIAL BUILDING FOR PROPOSED 'HOTEL (STUDENT HOSTEL)' USE AT 86 HUNG TO ROAD, KWUN TONG, KOWLOON

Drawing Title:
G/F PLAN

Drawing No.:
GP-01

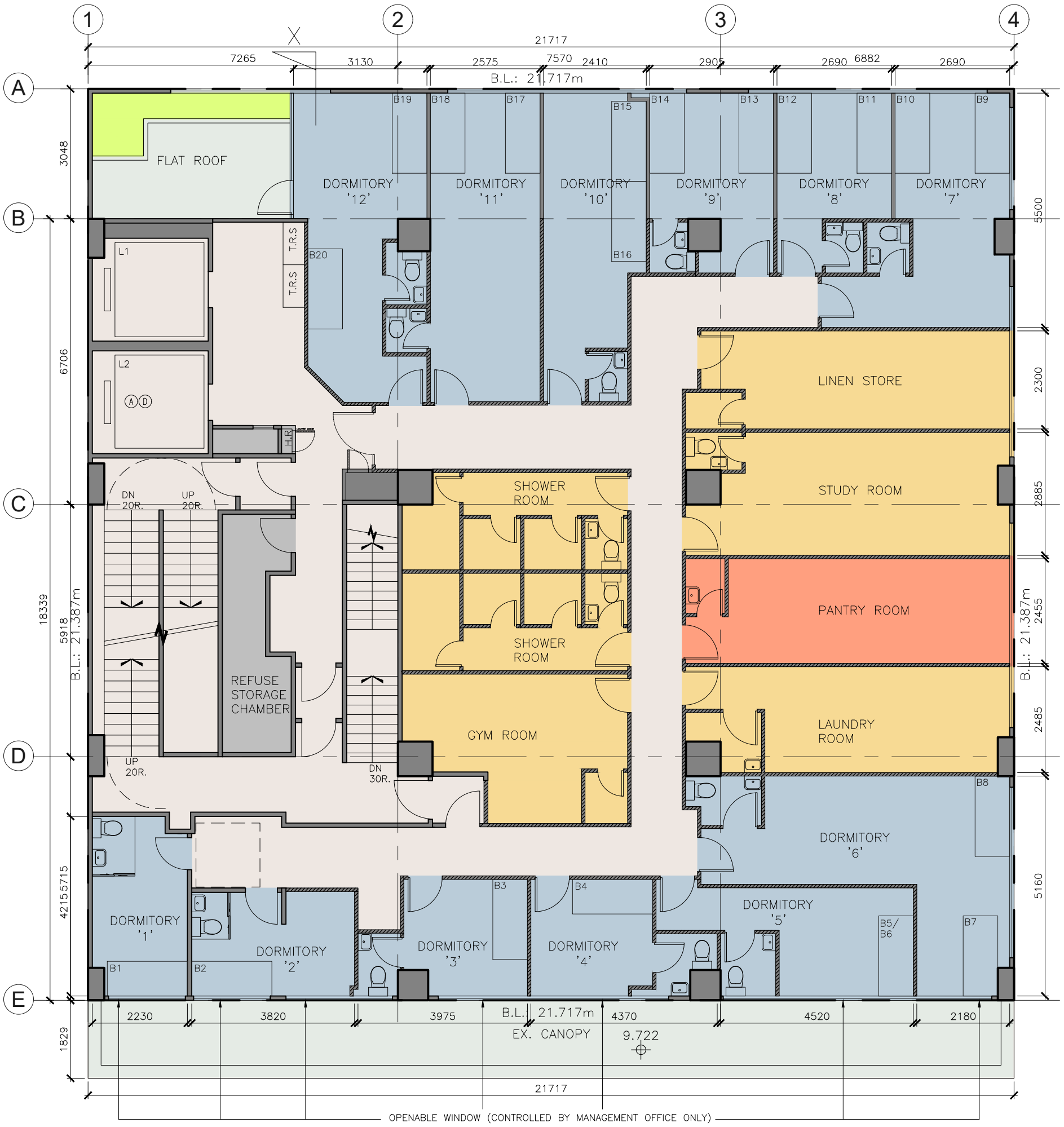
Architect:

樑安建築師有限公司
L&N Architects Ltd.
Rooms 1203-1204, 12/F Belgian Bank Building,
721-725 Nathan Road, Kowloon
Tel: (852) 3422 3082, Fax: (852) 3428 2269

1/F GFA : 445.461 s.m.

DORMITORY NO.	AREA (INCLUDING SHOWER ROOM) (m^2)	NO. OF BED SPACE
1	9.0	1
2	9.3	1
3	9.1	1
4	9.6	1
5	13.2	2
6	24.2	2
7	17.4	2
8	10.5	2
9	11.7	2
10	16.0	2
11	19.7	2
12	19.1	2
TOTAL	168.8	20

- STUDENT DORMITORY AREA
- STUDENT DORMITORY SUPPORTING FACILITIES AREA (AREA: 95s.m., GFA ACCOUNTABLE)
- STUDENT DORMITORY SUPPORTING FACILITIES AREA (AREA: 19s.m., EXEMPTED GFA)
- CORRIDOR, STAIRCASE AND LIFT
- FLAT ROOF AND CANOPY
- GREENERY (3.8 s.m.)
- NON-STUDENT DORMITORY AREA



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2026.6.16

Project:
SECTION 16 APPLICATION FOR PARTIAL CONVERSION OF AN EXISTING COMMERCIAL BUILDING FOR PROPOSED 'HOTEL (STUDENT HOSTEL)' USE AT 86 HUNG TO ROAD, KWUN TONG, KOWLOON

Drawing Title:
1/F PLAN

Drawing No.:
GP-02

Architect:

樑安建築師有限公司
L&N Architects Ltd.
Rooms 1203-1204, 12/F Belgian Bank Building,
721-725 Nathan Road, Kowloon
Tel: (852) 3422 3082, Fax: (852) 3428 2269

2/F GFA : 423.442 s.m.

DORMITORY NO.	AREA (INCLUDING SHOWER ROOM) (m^2)	NO. OF BED SPACE
1	9.0	1
2	9.2	1
3	9.2	1
4	9.6	1
5	13.2	2
6	24.2	2
7	17.4	2
8	10.5	2
9	11.7	2
10	13.0	2
11	14.3	2
12	15.7	2
TOTAL	157.0	20

STUDENT DORMITORY AREA
STUDENT DORMITORY SUPPORTING FACILITIES AREA (AREA: 96s.m., GFA ACCOUNTABLE)
STUDENT DORMITORY SUPPORTING FACILITIES AREA (AREA: 19s.m., EXEMPTED GFA)
CORRIDOR, STAIRCASE AND LIFT
NON-STUDENT DORMITORY AREA

GENERAL NOTES
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2026.6.16

Project:
SECTION 16 APPLICATION FOR PARTIAL CONVERSION OF AN EXISTING COMMERCIAL BUILDING FOR PROPOSED 'HOTEL (STUDENT HOSTEL)' USE AT 86 HUNG TO ROAD, KWUN TONG, KOWLOON

Drawing Title:
2/F PLAN

Drawing No.:
GP-03

Architect:

樑安建築師有限公司
L&N Architects Ltd.
Rooms 1203-1204, 12/F Belgian Bank Building,
721-725 Nathan Road, Kowloon
Tel: (852) 3422 3082, Fax: (852) 3428 2269

3/F GFA : 371.433 s.m.

DORMITORY NO.	AREA (INCLUDING SHOWER ROOM) (m^2)	NO. OF BED SPACE
1	8.8	1
2	10.3	2
3	7.9	1
4	8.8	1
5	12.2	2
6	24.9	2
7	22.7	2
8	11.4	2
9	9.9	1
10	9.0	1
11	10.7	2
TOTAL	**136.6**	**17**

STUDENT DORMITORY AREA
STUDENT DORMITORY SUPPORTING FACILITIES AREA (AREA: 98s.m., GFA ACCOUNTABLE)
CORRIDOR, STAIRCASE AND LIFT
FLAT ROOF AND CANOPY
GREENERY (9.0 s.m.)
NON-STUDENT DORMITORY AREA

GENERAL NOTES
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2. ALL DIMENSIONS ARE IN MILLIMETERS UNLESS NOTED OTHERWISE.
3. ALL DIMENSIONS SHALL BE VERIFIED ON SITE BEFORE PROCEEDING WITH THE WORK.
4. ARCHITECT SHALL BE NOTIFIED IN WRITING OF ANY DISCREPANCIES.

2026.6.16

Project:
SECTION 16 APPLICATION FOR PARTIAL CONVERSION OF AN EXISTING COMMERCIAL BUILDING FOR PROPOSED 'HOTEL (STUDENT HOSTEL)' USE AT 86 HUNG TO ROAD, KWUN TONG, KOWLOON

Drawing Title:
3/F PLAN

Drawing No.:
GP-04

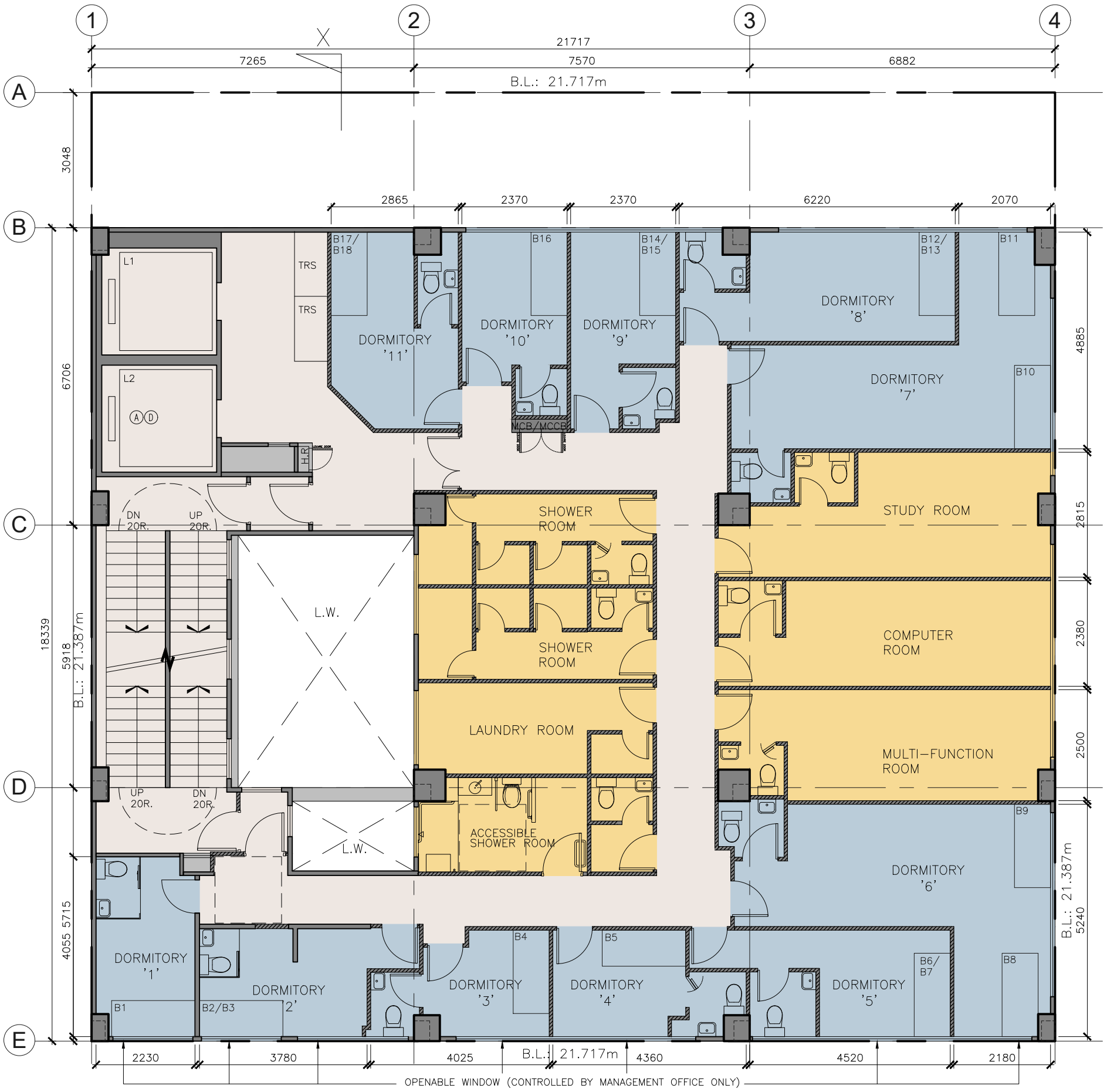
Architect:

樑安建築師有限公司
L&N Architects Ltd.
Rooms 1203-1204, 12/F Belgian Bank Building,
721-725 Nathan Road, Kowloon
Tel: (852) 3422 3082, Fax: (852) 3428 2269

4/F–6/F GFA (EACH STOREY): 371.433 s.m.

DORMITORY NO.	AREA (INCLUDING SHOWER ROOM) (m^2)	NO. OF BED SPACE
1	8.8	1
2	10.3	2
3	7.9	1
4	8.9	1
5	12.0	2
6	25.4	2
7	23.4	2
8	15.0	2
9	10.4	2
10	8.9	1
11	11.9	2
TOTAL	**142.9**	**18**

STUDENT DORMITORY AREA
STUDENT DORMITORY SUPPORTING FACILITIES AREA (AREA: 97s.m., GFA ACCOUNTABLE)
CORRIDOR, STAIRCASE AND LIFT
NON–STUDENT DORMITORY AREA



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3. ALL DIMENSIONS SHALL BE VERIFIED ON SITE BEFORE PROCEEDING WITH THE WORK.
4. ARCHITECT SHALL BE NOTIFIED IN WRITING OF ANY DISCREPANCIES.

2026.6.16

Project:
SECTION 16 APPLICATION FOR PARTIAL CONVERSION OF AN EXISTING COMMERCIAL BUILDING FOR PROPOSED 'HOTEL (STUDENT HOSTEL)' USE AT 86 HUNG TO ROAD, KWUN TONG, KOWLOON

Drawing Title:
4/F - 6/F PLAN

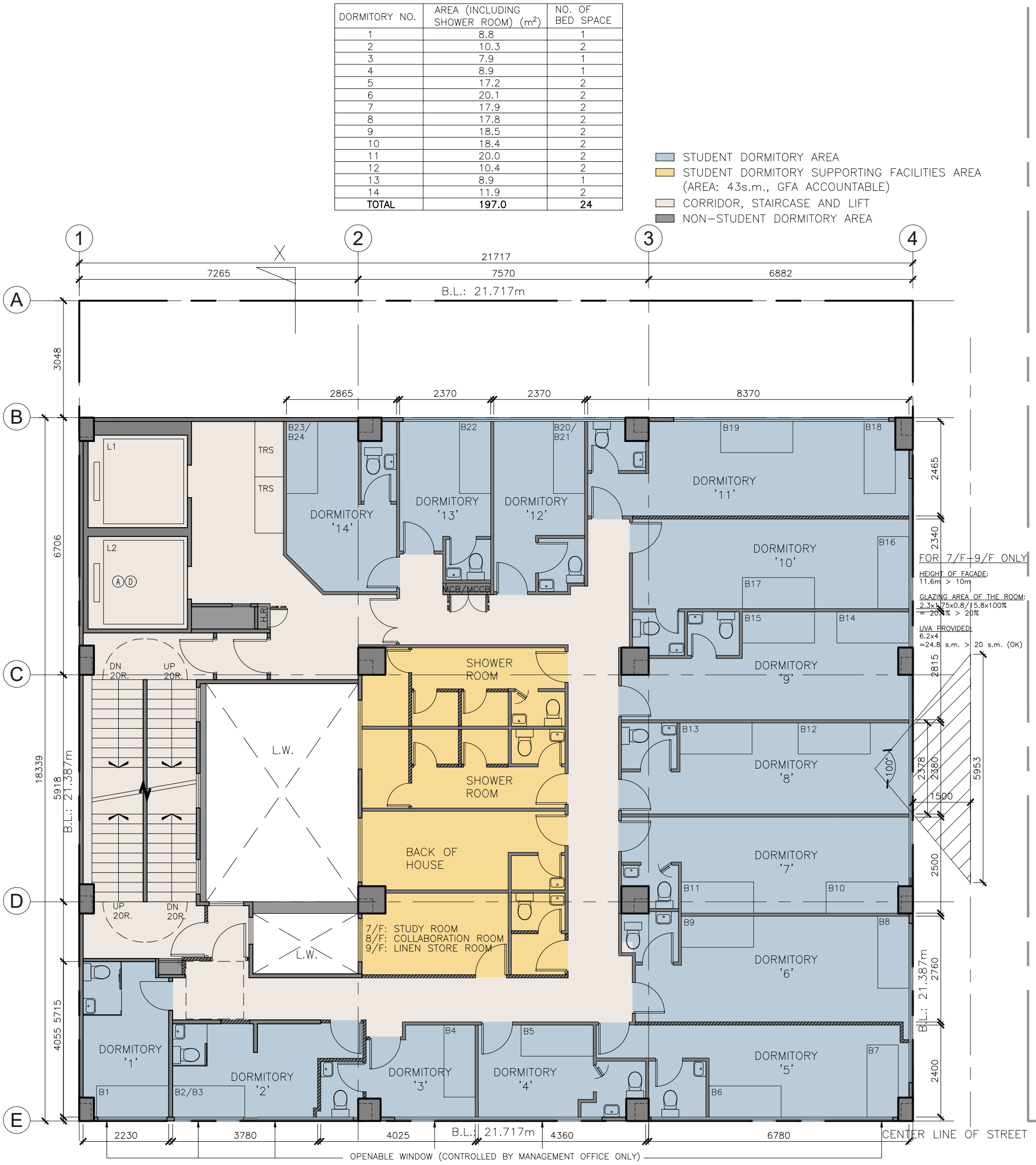
Drawing No.:
GP-05

Architect:

楙安建築師有限公司
L&N Architects Ltd.
Rooms 1203-1204, 12/F Belgian Bank Building,
721-725 Nathan Road, Kowloon
Tel: (852) 3422 3082, Fax: (852) 3428 2269

7/F–9/F GFA (EACH STOREY): 371.433 s.m.

DORMITORY NO.	AREA (INCLUDING SHOWER ROOM) (m^2)	NO. OF BED SPACE
1	8.8	1
2	10.3	2
3	7.9	1
4	8.9	1
5	17.2	2
6	20.1	2
7	17.9	2
8	17.8	2
9	18.5	2
10	18.4	2
11	20.0	2
12	10.4	2
13	8.9	1
14	11.9	2
TOTAL	**197.0**	**24**



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4. ARCHITECT SHALL BE NOTIFIED IN WRITING OF ANY DISCREPANCIES.

2026.6.16

Project:
SECTION 16 APPLICATION FOR PARTIAL CONVERSION OF AN EXISTING COMMERCIAL BUILDING FOR PROPOSED 'HOTEL (STUDENT HOSTEL)' USE AT 86 HUNG TO ROAD, KWUN TONG, KOWLOON

Drawing Title:
7/F - 9/F PLAN

Drawing No.:
GP-06

Architect:

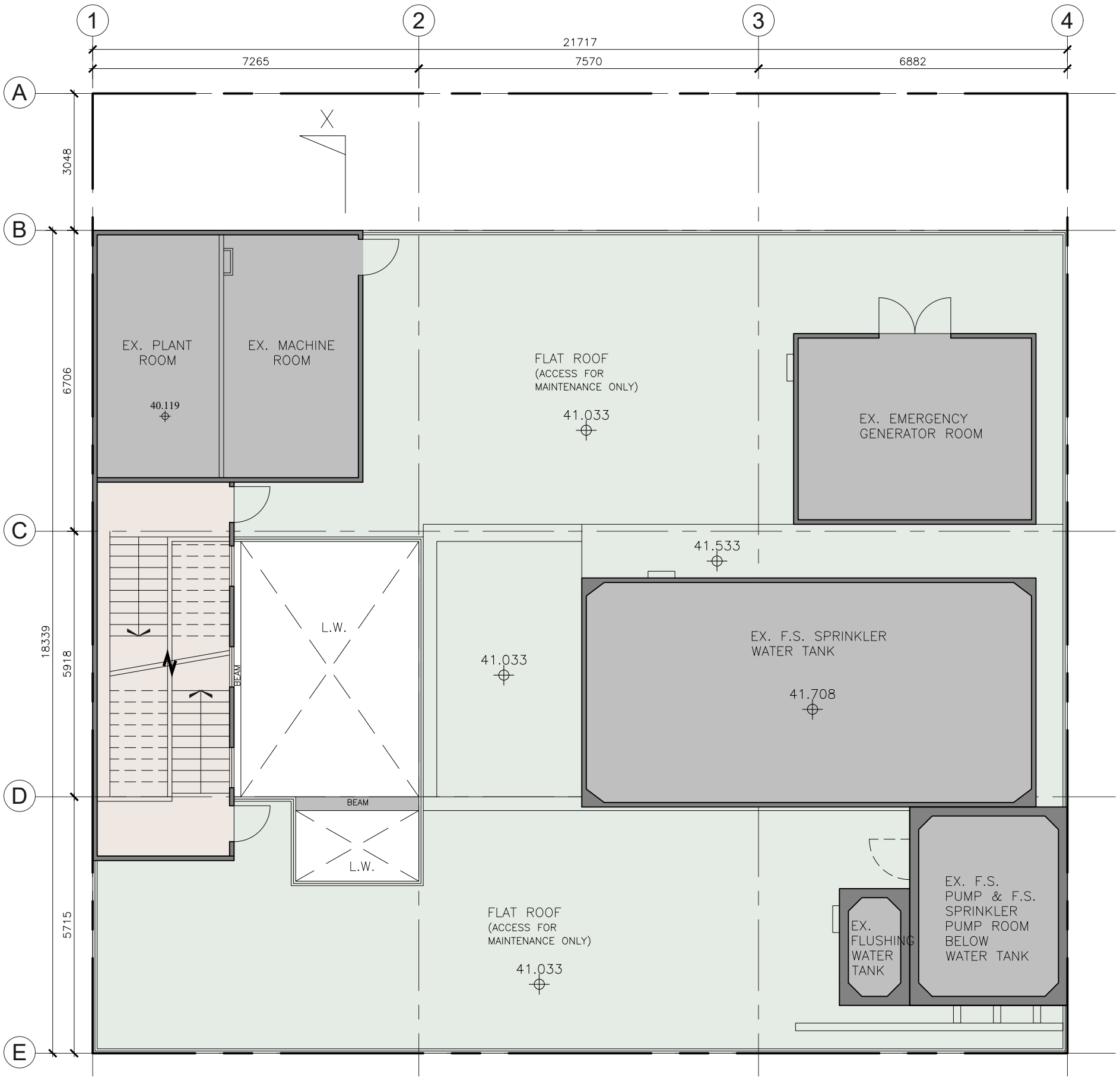
楙安建築師有限公司
L&N Architects Ltd.
Rooms 1203-1204, 12/F Belgian Bank Building,
721-725 Nathan Road, Kowloon
Tel: (852) 3422 3082, Fax: (852) 3428 2269

CALCULATION OF ROOF TOP OF BUILDING

TOTAL AREA OF ROOF TOP ANCILLARY STRUCTURES OF BUILDING: 178 s.m.
THE ROOF AREA OF THE FLOOR BELOW (i.e. 9/F): 371.433 s.m.

-> % OF ALL THE ENCLOSED STRUCTURES ON ROOF TOP OF BUILDING IS 48% OF THE ROOF AREA OF THE FLOOR BELOW

CORRIDOR, STAIRCASE AND LIFT
FLAT ROOF
NON-STUDENT DORMITORY AREA



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4. ARCHITECT SHALL BE NOTIFIED IN WRITING OF ANY DISCREPANCIES.

2026.6.16

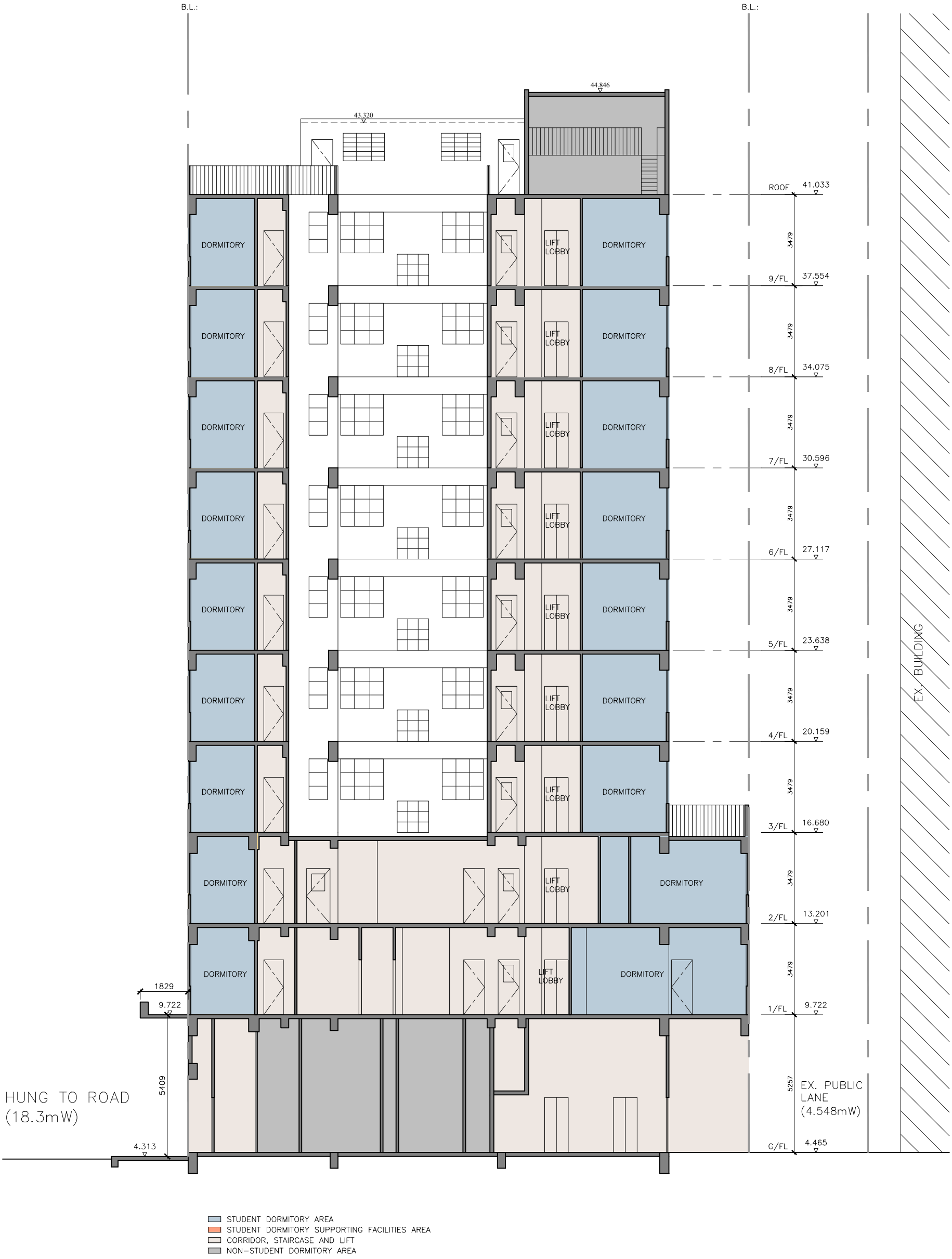
Project:
SECTION 16 APPLICATION FOR PARTIAL CONVERSION OF AN EXISTING COMMERCIAL BUILDING FOR PROPOSED 'HOTEL (STUDENT HOSTEL)' USE AT 86 HUNG TO ROAD, KWUN TONG, KOWLOON

Drawing Title:
R/F PLAN

Drawing No.:
GP-07

Architect:

樑安建築師有限公司
L&N Architects Ltd.
Rooms 1203-1204, 12/F Belgian Bank Building,
721-725 Nathan Road, Kowloon
Tel: (852) 3422 3082, Fax: (852) 3428 2269



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4. ARCHITECT SHALL BE NOTIFIED IN WRITING OF ANY DISCREPANCIES.

2026.6.16

Project:
SECTION 16 APPLICATION FOR PARTIAL CONVERSION OF AN EXISTING COMMERCIAL BUILDING FOR PROPOSED 'HOTEL (STUDENT HOSTEL)' USE AT 86 HUNG TO ROAD, KWUN TONG, KOWLOON

Drawing Title:
SECTION X

Drawing No.:
GP-08

Architect:
梓安建築師有限公司
L&N Architects Ltd.
Rooms 1203-1204, 12/F Belgian Bank Building,
721-725 Nathan Road, Kowloon
Tel: (852) 3422 3082, Fax: (852) 3428 2269

BED SPACE SUMMARY

FLOOR	NO. SINGLE ROOMS	NO. TWIN ROOMS	NO. OF BED SPACE
1/F	4	8	20
2/F	4	8	20
3/F	5	6	17
4/F	4	7	18
5/F	4	7	18
6/F	4	7	18
7/F	4	10	24
8/F	4	10	24
9/F	4	10	24
TOTAL	37	73	183

GENERAL NOTES
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4. ARCHITECT SHALL BE NOTIFIED IN WRITING OF ANY DISCREPANCIES.

2026.6.16

Project:
SECTION 16 APPLICATION FOR PARTIAL CONVERSION OF AN EXISTING COMMERCIAL BUILDING FOR PROPOSED 'HOTEL (STUDENT HOSTEL)' USE AT 86 HUNG TO ROAD, KWUN TONG, KOWLOON

Drawing Title:
BED SPACE SUMMARY

Drawing No.:
GP-09

Architect:

梁安建築師有限公司
L&N Architects Ltd.
Rooms 1203-1204, 12/F Belgian Bank Building,
721-725 Nathan Road, Kowloon
Tel: (852) 3422 3082, Fax: (852) 3428 2269

LEGEND:

PROPOSED SHRUBS (3.8 s.m.)

PROPOSED PAVING

SEAT BENCH

1/F GFA : 445.461 s.m.

DORMITORY NO.	AREA (INCLUDING SHOWER ROOM) (m^2)	NO. OF BED SPACE
1	9.0	1
2	9.3	1
3	9.1	1
4	9.6	1
5	13.2	2
6	24.2	2
7	17.4	2
8	10.5	2
9	11.7	2
10	16.0	2
11	19.7	2
12	19.1	2
TOTAL	168.8	20

STUDENT DORMITORY AREA

STUDENT DORMITORY SUPPORTING FACILITIES AREA (AREA: 95s.m., GFA ACCOUNTABLE)

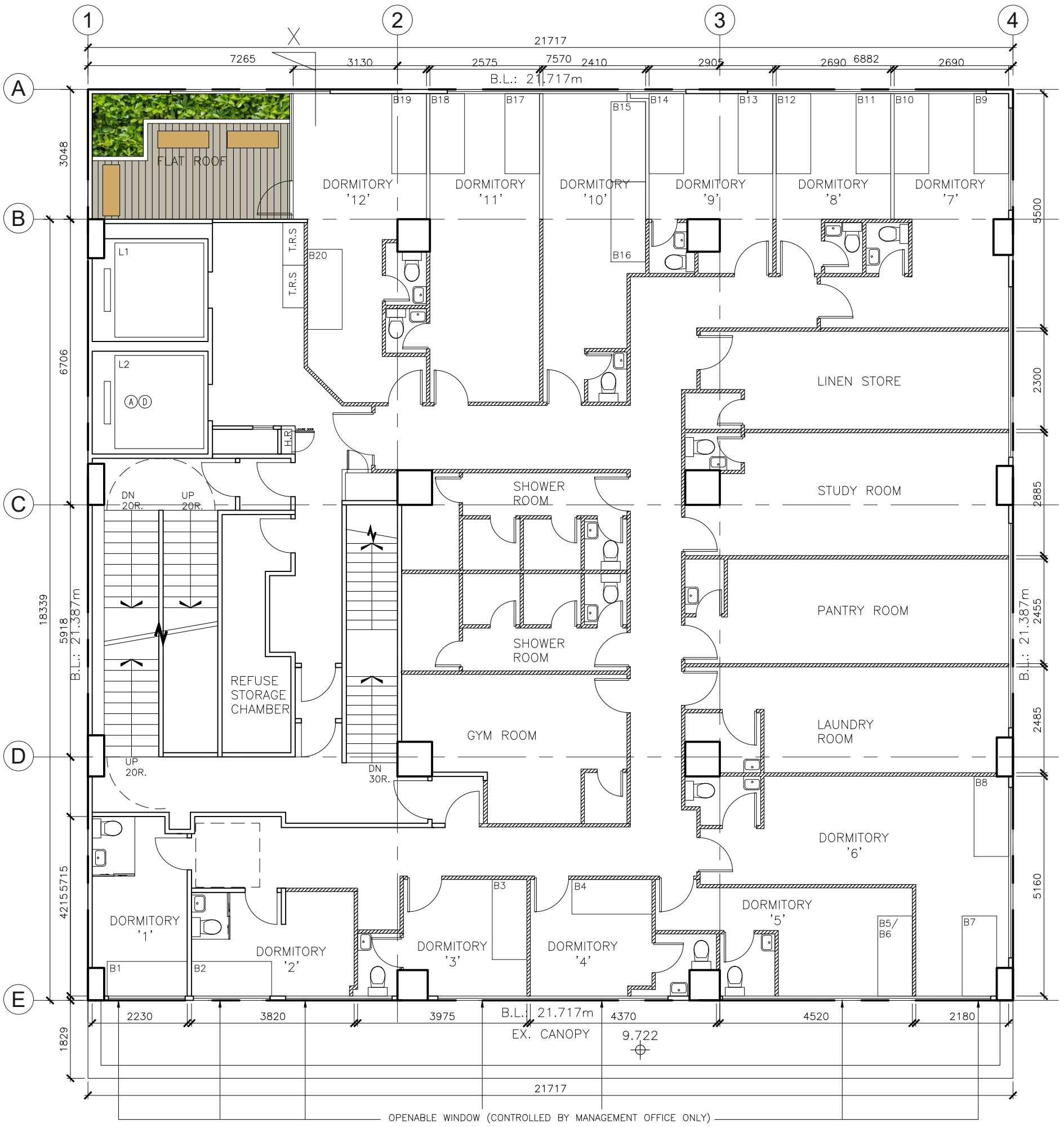
STUDENT DORMITORY SUPPORTING FACILITIES AREA (AREA: 19s.m., EXEMPTED GFA)

CORRIDOR, STAIRCASE AND LIFT

FLAT ROOF AND CANOPY

GREENERY (3.8 s.m.)

NON-STUDENT DORMITORY AREA



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2. ALL DIMENSIONS ARE IN MILLIMETERS UNLESS NOTED OTHERWISE.
3. ALL DIMENSIONS SHALL BE VERIFIED ON SITE BEFORE PROCEEDING WITH THE WORK.
4. ARCHITECT SHALL BE NOTIFIED IN WRITING OF ANY DISCREPANCIES.

2026.6.16

Project:
SECTION 16 APPLICATION FOR PARTIAL CONVERSION OF AN EXISTING COMMERCIAL BUILDING FOR PROPOSED 'HOTEL (STUDENT HOSTEL)' USE AT 86 HUNG TO ROAD, KWUN TONG, KOWLOON

Drawing Title:
1/F PLAN (LANDSCAPE PLAN)

Drawing No.:
GP-02(L)

Architect:

楙安建築師有限公司
L&N Architects Ltd.
Rooms 1203-1204, 12/F Belgian Bank Building,
721-725 Nathan Road, Kowloon
Tel: (852) 3422 3082, Fax: (852) 3428 2269

LEGEND:

PROPOSED SHRUBS (9.0 s.m.)

PROPOSED PAVING

SEAT BENCH

3/F GFA : 371.433 s.m.

DORMITORY NO.	AREA (INCLUDING SHOWER ROOM) (m^2)	NO. OF BED SPACE
1	8.8	1
2	10.3	2
3	7.9	1
4	8.8	1
5	12.2	2
6	24.9	2
7	22.7	2
8	11.4	2
9	9.9	1
10	9.0	1
11	10.7	2
TOTAL	**136.6**	**17**

STUDENT DORMITORY AREA

STUDENT DORMITORY SUPPORTING FACILITIES AREA (AREA: 98s.m., GFA ACCOUNTABLE)

CORRIDOR, STAIRCASE AND LIFT

FLAT ROOF AND CANOPY

GREENERY (9.0 s.m.)

NON-STUDENT DORMITORY AREA

GENERAL NOTES
1. DO NOT SCALE DRAWINGS. DIMENSIONS GOVERN.
2. ALL DIMENSIONS ARE IN MILLIMETERS UNLESS NOTED OTHERWISE.
3. ALL DIMENSIONS SHALL BE VERIFIED ON SITE BEFORE PROCEEDING WITH THE WORK.
4. ARCHITECT SHALL BE NOTIFIED IN WRITING OF ANY DISCREPANCIES.

2026.6.16

Project:
SECTION 16 APPLICATION FOR PARTIAL CONVERSION OF AN EXISTING COMMERCIAL BUILDING FOR PROPOSED 'HOTEL (STUDENT HOSTEL)' USE AT 86 HUNG TO ROAD, KWUN TONG, KOWLOON

Drawing Title:
3/F PLAN
(LANDSCAPE PLAN)

Drawing No.:
GP-04(L)

Architect:
樑安建築師有限公司
L&N Architects Ltd.
Rooms 1203-1204, 12/F Belgian Bank Building,
721-725 Nathan Road, Kowloon
Tel: (852) 3422 3082, Fax: (852) 3428 2269

Annex 3

Replacement Pages of Planning Statement

EXECUTIVE SUMMARY

(In case of discrepancy between English and Chinese versions, English shall prevail)

This Application is submitted to the Town Planning Board ("**the Board**") under the Section 16 of the Town Planning Ordinance ("**the Ordinance**") for Partial Conversion of an Existing Commercial Building for Proposed 'Hotel (Student Hostel)' Use ("**the Proposed Development**") at 86 Hung To Road, Kwun Tong, Kowloon ("**the Application Site**").

The Application Site falls within an area zoned as "Other Specified Uses" annotated "Business" ("**OU(B)**") on the Draft Kwun Tong (South) Outline Zoning Plan No. S/K14S/27 ("**the OZP**") and is currently occupied by an existing 10-storey commercial building known as Rich China Center ("**the Building**"). According to the Notes of the OZP Notes for Schedule I of the "OU(B)" zone, 'Hotel' is a Column 2 use which may be permitted upon application to the Board. Hence, the partial conversion of the Building into a 'Hotel (Student Hostel)' use requires planning permission from the Board. The Application Site is subject to a maximum plot ratio of 12 and a maximum building height of 100mPD as stipulated on the OZP.

The Proposed Development involves partial conversion of the existing building into a student hostel, hence, it will induce no change to the existing building bulk. Upon completion of the conversion, the total gross floor area will be about 3,818.8m² at a plot ratio of about 8.2. The maximum building height remains at about 41mPD at the main roof level (i.e. 10 storeys). The Proposed Development will offer 110 rooms, equipped with single or twin beds. The room sizes will range from a minimum of 7.9m² to a maximum of 25.4m², providing a total of 183 bed spaces to the local and non-local students. A range of recreational and supporting facilities will also be provided across different floors, including study rooms, pantry, computer rooms, gym rooms and laundry rooms, etc. These amenities aim to enhance the living quality and experience of the student occupants.

The Application Site is situated at the southeastern part of the Kwun Tong Business Area ("**KTBA**"), which is one of the four business/development areas undergoing transformation into the new "Central Business District 2" as part of the Government's overarching Energising Kowloon East Initiative, first promulgated in the 2011-12 Policy Address. In addition, the Proposed Development is a timely response to the Government's policy initiatives of promoting the "Study in Hong Kong" brand on a global scale, as outlined in the 2024 Policy Address. To support this vision, the Government launched the "Hostels in the City Scheme" in July 2025 to facilitate the market in converting existing commercial buildings into student hostels. In alignment with these policy initiatives, the Applicant intends to be a pioneer by submitting this application to convert the current commercial building into a student hostel development, thereby addressing the pressing demand for student accommodation in Hong Kong.

In addition to aligning with the aforementioned Government policy initiatives, the Proposed Development conforms to the prevailing planning intentions for the "OU(B)" zone under the OZP. On the district level, the Proposed Development will contribute to the transformation of KTBA from traditional industrial uses to modern business developments, enhancing synergy with surrounding commercial uses and fostering a vibrant community for both local and international students.

From technical perspectives, it is anticipated that the Proposed Development would not induce adverse visual impact or environmental impacts. It is also expected that future student occupants will primarily rely on public transport facilities for commuting, and therefore the Proposed Development would not generate additional traffic impact on the existing road network.

As such, the Proposed Development is fully justified as it demonstrates compliance with relevant Government policy initiatives, district transformation directions, the statutory plan requirements, as well as the technical feasibility. On the basis of the above, we sincerely wish that the Board would give favourable consideration to this Application.

內容摘要

(如內文與其英文版本有差異，則以英文版本為準)

本規劃申請根據《城市規劃條例》第 16 條，就九龍觀塘鴻圖道 86 號（下稱「**申請地點**」）的用地，向城市規劃委員會（下稱「**城規會**」）申請改裝部分現有商業大廈以作擬議「酒店（學生宿舍）」用途 （下稱「**擬議發展**」）。

申請地點現為一幢 10 層高的商業大廈，名為中富中心（下稱「**該大廈**」）。申請地點現時於《觀塘（南部）分區計劃大綱草圖編號 S/K14S/27》（下稱「**大綱圖**」）劃作「其他指定用途」註明「商貿」地帶。根據大綱圖的《註釋》，有關「其他指定用途（商貿）」地帶內附表 I：適用於露天發展或工業樓宇或工業-辦公室樓宇以外的建築物，擬議「酒店」屬於第二欄用途，須先向城規會申請規劃許可。申請地點的最高地積比率限為 12 倍及最高建築物高度限為主水平基準上 100 米。

擬議發展為部分改裝現有的商業大廈，因此將不會改變現有建築物的外型體積。改裝完成後的總樓面面積大約 3,818.8 平方米，地積比率約 8.2。而建築物高度將維持為現時的高度，即約主水平基準上 41 米（10 層）。擬議發展將提供 110 間學生宿舍房間，房間均為單人床或雙人床。房間面積從最小的 7.9 平方米到最大的 25.4 平方米不等，共提供 183 個床位，供本地及外地學生租用。此外，各樓層也將提供一系列娛樂及配套設施，包括自習室、備餐室、電腦室、健身房及洗衣房等，旨在提升學生住戶的生活質素和體驗。

申請地點位於九龍東觀塘商貿區的東南部分。於 2011-12 年的施政報告中，行政長官宣布把九龍東轉型為一個核心商業區，並推出「起動九龍東」政策，而觀塘商貿區是 4 個九龍東商貿/發展區之一。此外，擬議發展為及時回應政府在 2024 年《施政報告》中提出打造「留學香港」品牌的政策措施。政府隨後於 2025 年 7 月推出「城中學舍計劃」，以鼓勵市場將現有商廈改建為學生宿舍。為配合這些政策願景，申請人率先提交此申請，將現有商業大廈改裝為學生宿舍，從而滿足香港對學生住宿的迫切需求。

除了與上述政府政策措施相符外，擬議發展亦符合大綱圖內「其他指定用途（商貿）」地帶的規劃意向。在區域層面，擬議發展有助觀塘商貿區由傳統工業繼續轉型為商業發展區，從而增強與週邊商業用途的協同效應，並為本地和海外學生營造一個充滿活力的社區。

於技術層面上，預計擬議發展不會對景觀和環境造成負面影響。同時，未來的學生住戶將主要依賴公共交通設施通勤，因此亦不會對現時交通網絡製造額外的交通流量。

綜上所述，擬建發展完全合理，因為它符合相關的政府政策措施、區域轉型方向以，法定規劃要求以及技術可行性。基於上述規劃考量因素，申請人懇請城規會委員給予考慮並批准是次規劃申請。

4 THE DEVELOPMENT PROPOSAL

4.1 Development Scheme

4.1.1 The Application Site covers an area of about 464.5m^2 and is currently occupied by the existing 10-storey commercial building known as Rich China Center. The current proposal involves a partial conversion of the existing building to facilitate the development of a student hostel, while the existing commercial portion on the G/F, comprising a shop and an eating place, will be retained.

4.1.2 The Proposed Development adopts a vertical floor-to-floor height of about 3.5m for the student hostel floors, and the maximum building height would remain at about 41mPD at the main roof level (i.e. 10 storeys). Hence, there will be no change to the existing building bulk and the building footprint. Upon completion of the conversion, the Proposed Development will have a total gross floor area ("**GFA**") of about 3,818.8m^2, of which 3,621.3m^2 is the student hostel portion. The Proposed Development will offer 110 rooms, equipped with single or twin beds. The room sizes will range from a minimum of 7.9m^2 to a maximum of 25.4m^2, providing a total of 183 bed spaces. This diversity in room types and sizes is designed to accommodate the varying needs of the student population. Each hostel room is equipped with a private toilet and shower facility, allowing tenants to enjoy their own personal space and daily convenience. In recognition of diverse lifestyle preferences, separate communal shower rooms are also provided on each floor. This provides tenants with an alternative to suit their personal preferences and needs.

4.1.3 In addition to the hostel rooms, the Proposed Development offers a diverse array of supporting and recreational facilities across different floors, including study rooms, pantry, conference rooms, computer rooms, gym room, laundry and linen store room, etc. These amenities aim to enhance the living quality and experience of the student occupants, supporting both their educational and social development.

4.1.4 The major development parameters of the Proposed Development and the accommodation schedule of uses by floors are provided in **Tables 3** and **4,** respectively. The indicative layout plans of the Proposed Development are shown in **Annex 3.**

Table 3 Major Development Parameters

Major Development Parameters	
Site Area	About 464.5m^2
Total GFA of the Building - Student Hostel Portion^ - Commercial Portion on G/F*	About 3,818.8m^2 - 3,621.3m^2 - 197.5m^2
Total Plot Ratio	About 8.2
Building Height	About 41.0mPD (36.7m)
No. of Storeys	10
Site Coverage	79.97%
No. of Student Hostel Rooms - Single Rooms - Twin Rooms	Total 110 - 37 - 73
Room Size - Minimum Size - Maximum Size	 - 7.9m^2 - 25.4m^2
No. of Bed Spaces	183
No. of Parking Spaces for Private Cars	1 (accessible parking)
No. of Loading/Unloading Bay	1 (for light goods vehicles)
Anticipated Completion Year	2026 Q4

Remarks
^ Including GFA of 626m² for the supporting facilities of the student hostel.
* The commercial portion on the G/F is always permitted under the subject "OU(B)" zone, which does not form part of the current application and is shown on the layout plan for information only.

Table 4 Accommodation Schedule Upon Proposed Conversion

Floors	Proposed Uses
R/F	Flat Roof and E&M facilities
7/F to 9/F	Student Hostel Rooms, Shower Rooms, Back of House, E&M facilities and - 9/F: Linen Store Room - 8/F: Collaboration Room - 7/F: Study Room
4/F to 6/F	Student Hostel Rooms, Shower Rooms, Accessible Shower Room, Study Room, Computer Room, Multi-function Room, Laundry Room, E&M facilities
3/F	Student Hostel Rooms, Shower Rooms, Student Club, Computer Room, Study Room, Multi-function Room, Flat Roof Garden, E&M facilities
2/F	Student Hostel Rooms, Shower Rooms, Pantry Room, Study Room, Computer Room, Counselling Room, Linen Store, E&M facilities
1/F	Student Hostel Rooms, Shower Rooms, Pantry Room, Gym Room, Study Room, Laundry Room, Linen Store, Flat Roof Garden, E&M facilities
G/F	Commercial Portion (Eating Place and Shop), Lobby of Student Hostel, Car park, Loading/Unloading facilities and E&M facilities

4.2 Operational and Management Arrangements

4.2.1 Upon obtaining planning approval and the subsequent fulfilment of other relevant Government legislation/requirements, the Proposed Development will be operated with strict compliance under the Scheme, and the eligible tenants will be limited to students from the 31 eligible post-secondary institutions under the Scheme.

4.2.2 Male and female occupants will be accommodated on separate floors, subject to a detailed operational plan.

4.2.3 The Applicant also proposes to implement comprehensive security measures to ensure the safety and quality of the living environment in the student hostel. These measures will include, but are not limited to, access control systems with key cards, and a 24-hour CCTV surveillance system will be set up in common areas.

4.3 Open Space Provision and Landscape Treatments

4.3.1 Considering the site-specific constraints posed by the existing building at the Application Site, the Proposed Development strives to maximise landscape treatments and open space provisions to enhance the living environment for the future occupants. The existing flat roofs on the 1/F and 3/F will be transformed into outdoor common areas, offering residents valuable space for relaxation and social interaction.

4.3.2 Along with the proposed greenery treatment of shrubs and provision of benches, the design intent primarily aims to enhance the Proposed Development, creating a serene outdoor environment for the enjoyment of future occupants of the student hostel (**Annex 4** refers). The landscape treatment also seeks to establish a compatible and harmonious relationship with its surroundings to create a landscape space that is both aesthetically appealing and functionally practical.

Annex 4

Replacement Pages of Application Form

For Official Use Only 請 勿 填 寫 此 欄	Application No. 申請編號	
	Date Received 收到日期	

1. The completed form and supporting documents (if any) should be sent to the Secretary, Town Planning Board (the Board), 15/F, North Point Government Offices, 333 Java Road, North Point, Hong Kong.
申請人須把填妥的申請表格及其他支持申請的文件 (倘有)，送交香港北角渣華道 333 號北角政府合署 15 樓城市規劃委員會(下稱「委員會」)秘書收。

2. Please read the "Guidance Notes" carefully before you fill in this form. The document can be downloaded from the Board's website at http://www.tpb.gov.hk/. It can also be obtained from the Secretariat of the Board at 15/F, North Point Government Offices, 333 Java Road, North Point, Hong Kong (Tel: 2231 4810 or 2231 4835), and the Planning Enquiry Counters of the Planning Department (Hotline: 2231 5000) (17/F, North Point Government Offices, 333 Java Road, North Point, Hong Kong and 14/F, Sha Tin Government Offices, 1 Sheung Wo Che Road, Sha Tin, New Territories).
請先細閱《申請須知》的資料單張，然後填寫此表格。該份文件可從委員會的網頁下載 (網址：http://www.tpb.gov.hk/)，亦可向委員會秘書處 (香港北角渣華道 333 號北角政府合署 15 樓 – 電話：2231 4810 或 2231 4835)及規劃署的規劃資料查詢處(熱線：2231 5000) (香港北角渣華道 333 號北角政府合署 17 樓及新界沙田上禾輋路 1 號沙田政府合署 14 樓)索取。

3. This form can be downloaded from the Board's website, and obtained from the Secretariat of the Board and the Planning Enquiry Counters of the Planning Department. The form should be typed or completed in block letters. The processing of the application may be refused if the required information or the required copies are incomplete.
此表格可從委員會的網頁下載，亦可向委員會秘書處及規劃署的規劃資料查詢處索取。申請人須以打印方式或以正楷填寫表格。如果申請人所提交的資料或文件副本不齊全，委員會可拒絕處理有關申請。

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1. Name of Applicant 申請人姓名/名稱

Rich China Corporation Limited (Company 公司)

2. Name of Authorised Agent (if applicable) 獲授權代理人姓名/名稱（如適用）

PlanPlus Consultancy Limited (Company 公司)

3. Application Site 申請地點

(a) Full address / location / demarcation district and lot number (if applicable) 詳細地址／地點／丈量約份及地段號碼（如適用）	Kwun Tong Inland Lot No. 618, 86 Hung To Road, Kwun Tong, Kowloon
(b) Site area and/or gross floor area involved 涉及的地盤面積及／或總樓面面積	☑Site area 地盤面積 464.5 sq.m 平方米☑About 約 ☑Gross floor area 總樓面面積 3818.8 sq.m 平方米☑About 約
(c) Area of Government land included (if any) 所包括的政府土地面積（倘有）	..... sq.m 平方米 ☐About 約

(i) For Type (i) application 供第(i)類申請

(a) Total floor area involved 涉及的總樓面面積	3818.8 sq.m 平方米			
(b) Proposed use(s)/development 擬議用途/發展	Partial Conversion of an Existing Commercial Building for Proposed 'Hotel (Student Hostel)' Use (If there are any Government, institution or community facilities, please illustrate on plan and specify the use and gross floor area) (如有任何政府、機構或社區設施，請在圖則上顯示，並註明用途及總樓面面積)			
(c) Number of storeys involved 涉及層數	10	Number of units involved 涉及單位數目	110	
(d) Proposed floor area 擬議樓面面積	Domestic part 住用部分	0 sq.m 平方米	☐About 約	
	Non-domestic part 非住用部分	3818.8 sq.m 平方米	☑About 約	
	Total 總計	3818.8 sq.m 平方米	☑About 約	

(e) Proposed uses of different floors (if applicable)
不同樓層的擬議用途(如適用)
(Please use separate sheets if the space provided is insufficient)
(如所提供的空間不足，請另頁說明)

Floor(s) 樓層	Current use(s) 現時用途	Proposed use(s) 擬議用途

(f) Additional Information (if applicable)
附加資料（如適用）

Please refer to Planning Statement for the existing uses and proposed uses of each floor.

Gist of Application 申請摘要

(Please provide details in both English and Chinese as far as possible. This part will also be circulated to relevant consultees, uploaded to the Town Planning Board's Website for browsing and free downloading by the public and available at the Planning Enquiry Counters of the Planning Department for general information.)
(請盡量以英文及中文填寫。此部分會發送予相關諮詢人士、上載至城市規劃委員會網頁供公眾免費瀏覽及下載及於規劃署規劃資料查詢處供一般參閱。)

Application No. 申請編號	(For Official Use Only) (請勿填寫此欄)
Location/address 位置／地址	Kwun Tong Inland Lot No. 618, 86 Hung To Road, Kwun Tong, Kowloon
Site area 地盤面積	464.5 sq. m 平方米 ☑ About 約 (includes Government land of 包括政府土地 sq. m 平方米 ☐ About 約)
Plan 圖則	Draft Kwun Tong (South) Outline Zoning Plan No. S/K14S/27
Zoning 地帶	"Other Specified Uses" annotated "Business" ("OU(B)")
Applied use/ development 申請用途/發展	Partial Conversion of an Existing Commercial Building for Proposed 'Hotel (Student Hostel)' Use

(i) Gross floor area and/or plot ratio 總樓面面積及／或地積比率		sq.m 平方米	Plot Ratio 地積比率
	Domestic 住用	☐About 約 ☐Not more than 不多於	☐About 約 ☐Not more than 不多於
	Non-domestic 非住用	☑About 約 3818.8 ☐Not more than 不多於	☑About 約☐Not more than 不多於 8.2
(ii) No. of blocks 幢數	Domestic 住用		
	Non-domestic 非住用	1	
	Composite 綜合用途		
(iii) Building height/No. of storeys 建築物高度／層數	Domestic 住用	m 米 ☐ (Not more than 不多於)	
		mPD 米(主水平基準上) ☐ (Not more than 不多於)	
		Storeys(s) 層 ☐ (Not more than 不多於) *(☐Include 包括/☐ Exclude 不包括* ☐ *Carport 停車間* ☐ *Basement 地庫* ☐ *Refuge Floor 防火層* ☐ *Podium 平台)*	
	Non-domestic 非住用	36.7 m 米 ☐ (Not more than 不多於)	
		41.0 mPD 米(主水平基準上) ☐ (Not more than 不多於)	

		10 Storeys(s) 層 ☐ (Not more than 不多於) *(☐Include 包括/☐ Exclude 不包括* ☐ *Carport 停車間* ☐ *Basement 地庫* ☐ *Refuge Floor 防火層* ☐ *Podium 平台)*
	Composite 綜合用途	m 米 ☐ (Not more than 不多於)
		mPD 米(主水平基準上) ☐ (Not more than 不多於)
		Storeys(s) 層 ☐ (Not more than 不多於) *(☐Include 包括/☐ Exclude 不包括* ☐ *Carport 停車間* ☐ *Basement 地庫* ☐ *Refuge Floor 防火層* ☐ *Podium 平台)*
(iv) Site coverage 上蓋面積		% ☐ About 約
(v) No. of units 單位數目		110 hostel rooms
(vi) Open space 休憩用地	Private 私人	sq.m 平方米 ☐ Not less than 不少於
	Public 公眾	sq.m 平方米 ☐ Not less than 不少於
(vii) No. of parking spaces and loading / unloading spaces 停車位及上落客貨車位數目	Total no. of vehicle parking spaces 停車位總數 1 Private Car Parking Spaces 私家車車位 ____ Motorcycle Parking Spaces 電單車車位 ____ Light Goods Vehicle Parking Spaces 輕型貨車泊車位 ____ Medium Goods Vehicle Parking Spaces 中型貨車泊車位 ____ Heavy Goods Vehicle Parking Spaces 重型貨車泊車位 ____ Others (Please Specify) 其他 (請列明) Accessible Parking 1	
	Total no. of vehicle loading/unloading bays/lay-bys 1 上落客貨車位／停車處總數 Taxi Spaces 的士車位 ____ Coach Spaces 旅遊巴車位 ____ Light Goods Vehicle Spaces 輕型貨車車位 1 Medium Goods Vehicle Spaces 中型貨車位 ____ Heavy Goods Vehicle Spaces 重型貨車車位 ____ Others (Please Specify) 其他 (請列明) ____ ____	