

**Proposed Flat with Permitted Office and Shops & Services/Eating Places  
at 43 - 49A Hankow Road in Tsim Sha Tsui  
S16 Planning Application  
(Planning Application No: A/K1/269)**

## **Response-to-Comment Table**

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Comments	Response
<p><b><u>Comments from Urban Design Unit, Planning Department:</u></b> <b>(Contact Person: Mr Justin HO; Tel: 3565 3937)</b></p> <p><u>Planning Statement</u></p> <p>1. Details of some of the proposed design measures are missing/ not thoroughly discussed in the submission, including but not limited to:</p> <p>a. Proposed setbacks –</p> <ul style="list-style-type: none"> <li>• GF Layout Plan – Please clarify whether the proposed setback areas in the north, south and west of the site are publicly accessible. If so, the applicant may wish to consider incorporating appropriate design measures along the building’s façade, such as mural and lighting installation, to promote street vibrancy.</li> <li>• GF Layout Plan – Please clarify whether the 2.3m-wide setback in the west of the site is from the existing retaining wall, instead of the western site boundary.</li> <li>• 8F-17F and 19F-30F Layout Plans – It is noted in these layout plans that the building mass is further recessed at 8/F from the southwest corner and at 19/F from the eastern edge facing Hankow Road and the western edge of the proposed development. Please supplement its dimensions and provide relevant discussion in the text.</li> <li>• Para. 3.3.2 – Please review whether the proposed setbacks</li> </ul>	<p>These setbacks will be accessible for different purposes, for instance circulation, access to the residential portion and etc.. The suggested design features, such as mural and lighting installation, would be considered at the detailed design stage.</p> <p>The measurement of 2.3m setback is measured from the existing retaining wall. In other words, there will be an even wider setback from the site boundary above the retaining wall.</p> <p>The recessed corner at the southwestern corner would be not less than 6m by 6m and the building setback from Hankow Road from 19/F and above for not less than 6m. These are to demonstrate the proposed building would become more slender as it goes up. Please kindly note that these dimension are still subject to detailed design.</p> <p>Para. 3.3.2 should read as follows, “In addition to the 1.5m wide non-building area that is stipulated under</p>

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<p>with widths of about 2.3m, about 2.4m and at least 3m should be in the west, north and south of the site, instead of in the north, south and west.</p> <p>b. Proposed canopy, 1F Layout Plan –</p> <ul style="list-style-type: none"> <li>• Discussion on the proposed canopy at 1F along the southern edge of the proposed development, including its dimensions, is missing. Please supplement.</li> <li>• The applicant may consider exploring the possibility to extend the proposed canopy to cover the proposed NBA facing Hankow Road and the entrance of the Service Lift/ Commercial Lobby along the southern edge of the proposed development to enhance pedestrian comfort.</li> </ul> <p>c. Landscape treatments –</p> <ul style="list-style-type: none"> <li>• GF Layout Plan – Discussion on the proposed vertical greening at the fence wall along the southern boundary of the site is missing. Please supplement.</li> <li>• GF Layout Plan – Please indicate the green dotted area along eastern edge of the proposed development at GF and supplement relevant discussion in the text.</li> </ul>	<p>the OZP, the proposed development scheme has incorporated setbacks from all three sides of the Site, about 2.3m in the north and west and at least 3m (about 2.3m at the domestic levels) in the south. The proposed building gets more slender at 3/F and 18/F.” (<i>Appendix II</i> refers)</p> <p>Noted, please refer to the revised drawings in <i>Appendix I</i>.</p> <p>The Applicant proposes to provide two canopies of about 1.5m x about 5m at the entrances of the commercial portion and domestic portion of the proposed development. Not least, subject to the approval of the Buildings Department on the exemption of GFA, the canopy on Hankow Road would be expanded by about 18m.</p> <p>According to para. 2.2.2 of the Landscape Proposal (<i>Appendix 2</i> of the Supporting Planning Statement refers), the proposed vertical greening at the southern boundary of the Site will help to soften the built form and establish a visual identity for the development. The vertical green wall will also help to enhance the greening ambience along the entrance corridor of the proposed development. In view of the inclining nature of the escalator, the green wall will also be visible from Hankow Road and bring a noticeable improvement in urban greenery.</p> <p>According to para. 2.2.3 of the Landscape Proposal (<i>Appendix 2</i> of the Supporting Planning Statement refers), planting bed will be provided within the Non-building Area for better transition between the development and the surrounding environment. Ornamental shrubs and</p>

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<ul style="list-style-type: none"> <li>• 3F-7F Layout Plan – The discussion on the green roof at 3F, including any landscape treatments, its public accessibility and opening hours, is missing. Please supplement.</li> </ul> <p>d. Boundary treatments – The applicant may consider exploring the possibility to further provide boundary treatments along the northern and western site boundary, e.g. provision of landscape treatments at the existing retaining wall, to enhance pedestrian comfort.</p> <p>e. Please consider providing any visual illustration(s)/ artist's rendering(s) to illustrate the building design/ appearance and edge treatments as perceived by pedestrians at a closer scale.</p>	<p>groundcovers will be planted to soften the building profile and to maintain a general greening effect of the development at pedestrian level.</p> <p>According to para. 2.2.4 of the Landscape Proposal (<i>Appendix 2</i> of the Supporting Planning Statement refers), podium roof greening will be provided on 3/F. This green roof would add visual interest to the shop/office and it is primarily for groundcover planting to add aesthetic value to the area.</p> <p>Noted, the Applicant shall further review the boundary landscape treatment at detailed design stage.</p> <p>The Applicant has yet to develop the building design and façade treatment at this stage. Visual illustrations/renderings would be provided at the detailed design stage, if required.</p>
<p><u>Appendix I – Architectural Drawings</u></p> <p>2. Please consider providing a Master Layout Plan in the submission.</p> <p>3. Please indicate dimensions of the proposed setbacks and/ or building recesses on all layout and section plans for easy reference.</p> <p>4. Please annotate the section line on relevant layout plan(s) for easy reference.</p>	<p>Noted, please refer to the revised drawings in <i>Appendix I</i>.</p> <p>Noted, please refer to the revised drawings in <i>Appendix I</i>.</p> <p>Noted, please refer to the revised drawings in <i>Appendix I</i>.</p>

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<p>5. R/F and T/R Layout Plan – Please indicate the height levels in mPD for the floors below the main roof and the top roof for easy reference.</p> <p>6. Section Plan – Please indicate the height levels in mPD for the roof top structures.</p>	<p>Noted, please refer to the revised drawings in <i>Appendix I</i>.</p> <p>Noted, please refer to the revised drawings in <i>Appendix I</i>.</p>
<p><b><u>Comments from Buildings Department:</u></b> <b>(Contact Person: Mr Alex LUK; Tel: 2626 1523)</b></p> <p>The following irregularities should be rectified/clarified:</p> <p>(a) Regarding the proposed composite building with building height over 61m on a class A site, the proposed maximum non-domestic site coverage (SC) of 75% has exceeded the permissible limits stipulated under the First Schedule of the Building (Planning) Regulations (B(P)R); and</p> <p>(b) Service lane should be provided in accordance with B(P)R 28(1) and should be excluded from site area for the purpose of plot ratio and SC calculation under B(P)R 23(2)(a).</p>	<p>Please be clarified that the non-domestic site coverage of not more than 75% as stated in Table 3.1 Technical Schedule refers to the site coverage of G/F, 1/F and 2/F only, which do not exceeding 15m above ground level. For the non-domestic site coverage for the proposed building above 15m from ground, it would be not more than 60%, which will comply with the First Schedule of B(P)R.</p> <p>Please note that the proposed development is a detached building, which is not connected to any other building. It has a clear and unobstructed open space that extends the entire depth and at the rear of the building of not less than 2.3m in accordance with B(P)R 28(1). As such, service lane is not required.</p>

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<p><b><u>Comments from Landscape Unit, Planning Department:</u></b> <b>(Contact Person: Ms Frances TSAI; Tel: 3565 3948)</b></p> <p>Having reviewed the further information and R-to-C table, please note below our comments on the submission from landscape planning perspective:</p> <p>(a) Please provide sections to cut across the boundary of the adjacent lot and the proposed building in order to indicate the key dimension of the corridor and the proposed vertical greening.</p> <p>(b) The applicant should provide typical design details of the proposed vertical greening and the proposed “grow light system” for vertical greening.</p> <p>(c) For those shade tolerant species mentioned in R-to-C table, however, the proposed species could not be found in the planting schedule in Figure 2.1.</p>	<p>Please refer to the additional section in <i>Appendix III</i>.</p> <p>Typical design details of the vertical greening and the proposed “grow light system” have been added to a new drawing no. LLP-08 (<i>Appendix III</i> refers).</p> <p>Figure 2.1 of the Landscape Proposal has been updated to include the shade tolerant species (<i>Appendix III</i> refers).</p>
<p><b><u>Comments from Transport Department:</u></b> <b>(Contact Person: Mr Lucas CHAN; Tel: 2399 2511)</b></p> <p>1. Re. our previous approval condition of the Building Plan Submission, the applicant has confirmed that there will be no change in land lease, land use, zoning and planning applications for the subject development. Nonetheless, a S.16 Planning Application is being made. Please clarify.</p>	<p>Please kindly note that the subject site is zoned “Commercial (6)” under the Approved Tsim Sha Tsui Outline Zoning Plan No. S/K1/28. The approved GBP is for a pure commercial development thus no planning application is required.</p> <p>Since the current proposal includes both commercial and domestic use and domestic use is a Column 2 Use in “Commercial” zone, the</p>

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<p>2. The applicant further advised that the application site is currently occupied by an existing composite building with retails shops and eating places on the lower floors and about 90 residential units above without internal parking provisions. In view of the parking demand for the district, the applicant shall assess the parking, loading and unloading (L/UL) demand for the proposed development according to HKPSG and review the feasibility of providing such internal parking facilities for the subject development. Sound justification shall be given for under-provision of the parking, loading and unloading requirements.</p> <p>3. Re Section 2.5.1, please include the junction of Kowloon Park Drive / Salisbury Road in the assessment. In addition, the junctions along Canton Road are also missing in your assessment. Please review and elaborate on the area of influence for consideration.</p>	<p>Applicant therefore is required to seek approval from the Town Planning Board under section 16 of the Town Planning Ordinance.</p> <p>The feasibility of providing internal transport facilities have been reviewed and shown in <b>Drawing SK-101 to SK-113</b> attached in <i>Appendix IV</i>.</p> <p>In view of (i) Hankow Road is currently a traffic calming street which is one of the walkability enhancement measures to promote pedestrian comfort and safety; (ii) the location of a run-in/out (if any) would be too close to the existing road junction of Haiphong Road/Hankow Road and with insufficient sightline to the pedestrian crossing of the aforementioned junction, hence would create road safety concern; (iii) the existing loading/unloading bays at Hankow Road would need to be removed to cater for the sightline of the run-in/out; and (iv) the provision of internal transport facilities would result in an overall net loss of loading/unloading bay considering the reduction of the existing loading/unloading bays on Hankow road, the proposed provision of internal transport facilities for the subject site is considered not desirable from traffic point of view.</p> <p>Please note that <b>J8</b>: Salisbury Road/Kowloon Park Drive has been included in the junction capacity assessment of the revised TIA report in <i>Appendix V</i>.</p> <p>Based on the vehicular route to the subject site indicated in <b>Drawing SK-114</b> in <i>Appendix IV</i>, the shortest route from the north of the subject site would be via Kowloon Park Drive, Peking Road and Hankow Road instead of Canton Road, Salisbury Road, Kowloon Park Drive, Peking Road and Hankow Road. Hence, it is considered that assessment on road</p>

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<p>4. Re. Section 2.5.2, it appears that the identified morning and evening peak hours may not reflect the recent traffic conditions at peak hours. Please review. In addition, as Tsim Sha Tsui is a tourist area, the traffic assessment during the weekend shall also be conducted.</p> <p>5. Re. Section 2.6.4, some major car parks near the application site are missing in your survey (e.g. The Gateway Car Park, Gateway Boulevard Open Car Park, Victoria Dockside, iSquare, The One, etc.). Please review and elaborate on the selection criteria of parking utilization survey for consideration.</p> <p>6. Re Section 2.6.5, according to our observations, the occupancies of the car parks in the vicinity of the application site are quite high and waiting queues are sometimes observed during the peak hours. The observed available car parking spaces appears to be overestimated. Please further elaborate.</p>	<p>junctions along Canton Road would not be necessary.</p> <p>The area of influence for the assessment has been updated to include the junction of Salisbury Road/Kowloon Park Drive and illustrated in <b>Figure 2.4</b> of the revised TIA report in <i>Appendix V</i>.</p> <p>The hourly profile of the total traffic count at all assessed road junctions during the weekday AM and PM survey peak periods is supplemented in <b>SK-115</b> in <i>Appendix IV</i>. The identified AM and PM peak hour presented in the TIA report are based on the observed AM and PM peak hours found in the above hourly profile.</p> <p>Additional traffic surveys at all junctions were conducted on a Saturday in November 2023, and the traffic assessment for weekend peak hour scenario has been supplemented in the revised TIA report in <i>Appendix V</i>.</p> <p>The intention of the parking utilization survey was to demonstrate that there are sufficient available car parking spaces located in the vicinity of the subject site. As the selected car parks in the TIA report would be able to serve the above purpose, therefore not all major car parks were surveyed.</p> <p>According to the survey results of the parking utilization survey, the available car parking spaces are higher than the HKPSG recommended upper limit on car parking spaces provision for the proposed development. Hence, it is anticipated that the observed available car parking spaces would be able to cater for the demand of car parking spaces for the proposed development.</p>



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7. Re. Section 2.6.9, we noted that light vans or light goods vehicles were observed at the surveyed sites. In view of the L/UL demand for the proposed development and traffic conditions of Hankow Road, the applicant shall review the feasibility of providing L/UL facilities for the subject development.	Please refer to our reply on Comment No. 2.
8. Re. Section 2.6.11, the survey results show that >70% and about 50% average utilization rates were recorded for Lay-by A and Lay-by B in general. However, the survey frequency and night-time survey are missing, hence, your conclusion of " <i>both general lay-bys were not fully utilised</i> " is premature. Based on the available results, it appears that frequent L/UL activities were observed at Hankow Road. Please review your assessment and the feasibility of providing L/UL facilities for the subject development.	Since the loading/unloading activities of the proposed development are expected to mainly occur during daytime, it is believed that the survey conducted during daytime on a typical day would be able to provide the general utilisation of both general lay-by during the peak demand of loading/unloading activities of the proposed development.
9. Re Sections 3.2.2, 3.2.7 to 3.2.14, as the existing building will be demolished and replaced by a new building, in consideration of the size of building footprint, the building site is prima facie having sufficient space to construct a car park via careful planning and optimizing the position of building structural elements and car park facilities. Please critically review.	Please refer to our reply on Comment No. 2.
10. Re. Section 3.2.3, the applicant advised that the existing "L" shape retaining wall structure is required to be maintained to stabilise the soil. While this office has no expertise in geotechnical engineering, the applicant may explore the feasibility of carrying out ground treatment works, installing ELS, etc. to stabilise the soil and maximise the car park layout.	The earliest record of the retaining wall found is in year 1958 from the Bravo database of the Buildings Department. Unfortunately, there is no structural information about wall such as reinforcement details and interface details with adjacent lots to be based for structural modification.

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<p>11. Re. Section 3.3 and our comments above, your justifications for nil internal transport facilities for the subject development is premature. In addition, the internal parking provisions of a development shall normally be self-contained and shall not rely on any vacant car parking spaces and/or loading and unloading</p>	<p>Limited record from Bravo database of the Buildings Department could indicate the captioned retaining wall is likely extending beyond the site boundary toward Maxwell Centre where the land has been surrendered to the Government in year 1984 in accordance with the record building plan of the adjoining building (i.e. Maxwell Centre). Feasibility and practicality of structural modification to the retaining wall at interface between Maxwell Building development and this site is in doubt.</p> <p>From site observation, indications of local settlement at the back service lane are observed. If the subject retaining wall were to be modified, there is a high risk of further weakening the retaining system and hence a high chance of causing further ground settlement.</p> <p>Installation of temporary retaining wall (TRW) outside the subject retaining wall to avoid the ground settlement is practically not feasible. Not only owing to the limit of working for such TRW installation, but this would also:</p> <ol style="list-style-type: none"> <li>1. block the service lane which also serves as the fire escape path of the adjacent development(s);</li> <li>2. disturb the existing building services and pipework currently serving the adjacent development(s); and</li> <li>3. cause construction vibration which will worsen the ground settlement situation.</li> </ol> <p>Please refer to our reply for Comment 2.</p>

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spaces, if any, in the vicinity under normal circumstance. Please review the feasibility.	
12. Re Section 3.3.15, please refer to Item 1 above. Please note that our comments on the latest GBP is based on the understanding and confirmation from the applicant that there will be no change in land lease, land use, zoning and planning applications for the subject development. Should there be any change of land lease, land use, zoning and planning applications for the subject development, the applicant is expected to take opportunity to conduct a holistic traffic assessment.	Noted.
13. Re. Section 4.3, please consult PlanD and include all planned developments in your assessment if appropriate.	Noted. As informed by PlanD, all the planned land uses within Tsim Sha Tsui area can be obtained in the Tsim Sha Tsui Outline Zoning Plan via TPB Statutory Planning Portal. The relevant planned developments are listed in <b>Table 4.3.1</b> of the TIA report.
14. Re. Section 4.6.1 and our comments (items 3 & 4) above, the junction of Kowloon Park Drive / Salisbury Road and junctions along Canton Road are missing in your assessment. Please review.	Please refer to our reply on Comment No. 3.

Consolidated by: **KTA Planning Limited**

Date: **13 November 2023**

**List of Appendices**

**Appendix I** Updated Architectural Drawings

**Appendix II** Para. 3.2.3 (new) and para. 3.3.2 (updated) of the Supporting Planning Statement

**Appendix III** Landscape-related Drawings

**Appendix IV** Traffic-related Figures

**Appendix V** Revised Traffic Impact Assessment