(Planning Application No. A/K1/271)

Further Information No. 1

Response-to-Comment Table

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Comments	Summary & Response
Comments from Transport Department: (Contact Person: Mr Sunny KWAN, Tel: 2399 2511)	
Appendix 3 – TIA	
1. Section 1.1.4 – The statement "the Transport Department had no comment on the nil internal Transport provision from traffic engineering viewpoint" is under a condition that all loading/unloading activities of the subject development will be carried out during the off-peak hour (i.e. between 8am and 4pm). The applicant shall submit undertaking letter to this office to confirm the said arrangement for the subject development. Please include the condition in Section 1.1.4 or add a footnote;	Noted. The mentioned condition on the previous approved application has been included in Section 1.1.4 of the revised Traffic Impact Assessment (TIA) report (Appendix III refers). For the current application, the Applicant will submit undertaking letter to confirm the said arrangement for the Proposed Development upon approval of the subject planning application and under discharge of approval condition.
2. Further to comment (i), please advise the proposed measures to ensure that the retail and hotel tenants will comply with the aforementioned condition for loading/unloading within the specified period;	To ensure that retail and hotel tenants will comply with the specified condition for loading/unloading activities and coach pick-up/drop-off activities (refer to reply for comment item 8) within the specified period, the Applicant proposes the following:
	 Specific clauses will be incorporated into the tenancy agreements requiring retail tenants to adhere strictly to the permitted loading / unloading and coach pick-up/drop-off hours; For the loading / unloading and coach pick-up/drop-off associated to the daily operation of the hotel, the hotel management team shall liaise and arrange with the relevant company on the permitted loading / unloading and coach pick-up/drop-off hours. The hotel guests will be notified on the permitted loading/unloading hours during check-in; and

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		The property management team will oversee daily operations, including monitoring the loading/unloading and coach pick-up/drop-off activities to ensure compliance.
3.	Section 2.6.4 – Please specify the survey dates of the parking utilization survey, which should cover both weekdays and weekends to accurately reflect the parking demand in Tsim Sha Tsui area;	Please be advised that the survey dates of the parking utilisation survey, covering both weekday and a weekend, have been added into Section 2.6.4 of the revised TIA report (Appendix III refers).
4.	Section 2.6.7 – Please specify the survey dates of the trip generation and vehicle type survey, which should cover both weekdays and weekends as more hotel guests are expected in weekends;	Please be advised that the survey dates of the trip generation and vehicle type survey, covering both weekday and a weekend, have been added into Section 2.6.7 of the revised TIA report (Appendix III refers).
5.	Section 2.6.9 & 2.6.12 – Similar to comment (iv), please specify the survey dates;	Please be advised that the respective survey dates have been added into Sections 2.6.9 and 2.6.12 of the revised TIA report (Appendix III refers).
6.	Table 3.2.1 — The parking and loading/unloading provision calculated should be rounded up to the next whole number. Please review all the figures under "Retail" and "Hotel";	Please be advised that the retail GFA adopted for the calculation of the internal transport facilities has been revised to 4,127.6m ² in accordance with the submitted planning statement. All the figures under the "Retail" and "Hotel" categories, relating to the calculation of internal transport provision, have been reviewed and updated accordingly in Table 3.2.1 of the revised TIA report (Appendix III refers).
7.	Section 3.3.6 – See comment (iii);	Please be advised that weekend peak hour parking utilisation data with reference to Table 2.6.4 has been supplemented in Section 3.3.6 of the revised TIA report (Appendix III refers).
8.	Section 3.3.10 – Please confirm that there will be no coach service for the hotel of the subject development and include it in the undertaking letter in comment (i);	The concern regarding coach operations associated with the proposed hotel development is noted. To address the traffic concern, the Applicant agrees to undertake that all coach pick-up / drop-off activities, if any, will be carried out during the off-peak hour (i.e. between 8am and 4pm),

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	consistent with the condition imposed for loading / unloading activities. Based on the trip generation survey results for hotel with less than 100 rooms, the trip generation of coach due to the proposed hotel at the subject site of similar scale is expected to be minimal. Hence, the above proposed arrangement is believed to be acceptable from traffic viewpoint. The above undertaking can be incorporated into the letter as mentioned in comment item 1.
9. Section 4.1.2 – Please advise the reason of not adopting the traffic rates for "Hotel" in TPDM Vol. 1 Annex C Tables 2, which is higher than the adopted trip rates. Refer to comment (iv), please also conduct the trip rate survey in weekends; and	The trip rates for "Hotel" developments specified in TPDM Vol. 1 Annex C Table 2 is for a common hotel which may not be able to reflect the actual peak hour traffic generation associated to the proposed hotel which have less than 100 rooms and located within close proximity of numerous public transport services.
	Instead, survey-based trip rates had been adopted, derived from 2 hotels of a similar scale (i.e. less than 100 guest rooms) located in areas with comprehensive public transport network in Tsim Sha Tsui. As such, the adopted trip rates would provide a more realistic estimation of the actual traffic demand expected to be generated by the proposed hotel within the subject development.
	Please be advised that additional trip generation and vehicle type survey had been conducted at two hotel sites on 28 June 2025 (Sat) and the results have been summarised in Table 2.6.6 of the revised TIA report (Appendix III refers).
10. Section 4.1.4 – As per TPDM Vo.1 Annex C, retail / shopping complex and hotel may have higher traffic rates at periods other than	To derive the Saturday trip rate to be adopted for retail and hotel use, additional traffic surveys had been conducted.
	For proposed retail portion of the subject development

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weekdays. Please provide justification of using the trip generation figures in weekdays to represent the weekend peak hour generation.	A trip generation survey was conducted from 17:00 - 20:00 on weekday and weekend for the retail use located on the lower floors of Yue Hwa International Building, which is a reference site identified in Section 2.6.9 of the TIA report (Appendix III refers).
	Based on the survey results of the whole survey period, there were 1.5 pcu and 2 pcu on weekday and weekend respectively. Therefore, the revised TIA has adopted an adjustment factor of 1.5 (calculated from the ratio of weekend to weekday pcu, i.e. 2 / 1.5) to the weekday trip rates extracted from TPDM to generate a higher trip rates for retail use on weekend. The assessment has been updated accordingly and the results are presented in Tables 4.1.1 and 4.1.3 (Appendix III refers).
	For proposed hotel portion of the subject development
	Based on the updated trip generation and vehicle type survey results on Saturday for the 2 reference hotels (refer to Tables 2.6.5 and 2.6.6 of the revised TIA Report in Appendix III), the overall weekend trip generation rate at both hotels was found to be lower than weekday. For conservative purposes, the trip generation rate on weekday has therefore been adopted to also represent the weekend trip generation in the assessment.
Comments from the Office of the Licensing Authority/Home Affairs Department: (Contact Person: Ms Iris WONG, Tel: 2881 7024) 1. The applicant should submit a copy of the occupation permit or acknowledgement letter for the proposed building when making an application under the Hotel and Guesthouse Accommodation Ordinance (HAGAO), Cap 349; and	Noted.

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2. The licensing requirements will be formulated after inspections by her office's Building Safety Unit and Fire Safety Team upon receipt of application under HAGAO.	Noted.
Comments from Hong Kong Police Force: (Contact Person: Mr Lester CHENG, Tel: 3661 9119)	
1. It is understand that the proposed location is convenient for accessing by public transportation so that parking facilities is not necessary. However, for the commercial purpose, loading and unloading facilities should be included in the building area so as to minimize illegal parking issue to the surrounding areas.	The concern on illegal parking issue to the surrounding areas is noted. To facilitate the loading / unloading facilities in the building area, the provision of a run-in/out at Hankow Road would be required, but this is not desirable from traffic viewpoint due to the following: • According to Transport Planning and Design Manual (TPDM) Vol. 2, Ch. 3.6.2.3, run-ins should not normally be sited within 45m of the stop line on minor road of a signalised junction. Assuming a conceptual run-in/out to be provided at the subject site furthest away from the stop-line, the measured distance between the run-in/out and the existing stop line on Hankow Road is approximately 33m, which would falls short of the minimum required distance and therefore does not comply with the relevant TPDM design guidelines; and • At present, there is a general layby fronting the subject site. Vehicles conducting loading / unloading activities at the general lay-by near the proposed run-in/out, especially goods vehicle, would obstruct the sightline (towards on-coming traffic) of the vehicles leaving the subject site. The provision of "keep clear" road marking and / or 24-hour daily no-stopping restriction to address the above concern would reduce the length of the general

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	lay-by which is serving the loading / unloading demands from other local buildings.
	The Town Planning Board approved the Section 16 Planning Application No. A/K1/269 for Proposed Flat with Permitted Office, Shop and Services and Eating Place at the subject site in January 2024. Under the approved application, nil internal transport provisions were proposed, subject to a condition requested by TD that all loading / unloading activities of the subject development will be carried out during off-peak hours (i.e. between 8am and 4pm). In line with this previous approved application, the current application will undertake to comply with the same condition, ensuring that all loading / unloading activities and coach pick-up/drop-off activities will be confined to the same off-peak hours.
	The Applicant proposes the following measures to ensure that the loading / unloading activities are carried out during off-peak hours:
	 Specific clauses will be incorporated into the tenancy agreements requiring retail tenants to adhere strictly to the permitted loading / unloading and coach pick-up/drop-off hours;
	• For the loading / unloading and coach pick-up/drop-off associated to the daily operation of the hotel, the hotel management team shall liaise and arrange with the relevant company on the permitted loading / unloading and coach pick-up/drop-off hours. The hotel guests will be notified on the permitted loading/unloading hours during check-in; and

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	 The property management team will oversee daily operations, including monitoring the loading/unloading and coach pick- up/drop-off activities to ensure compliance.
	In view of the above justifications and there is general lay-by located along the site frontage at Hankow Road which can cater for loading/unloading activities, the provision of nil internal transport facilities within the proposed development believed to be acceptable from traffic engineering viewpoint.
Comments from Environmental Protection Department: (Contact Person: Ms Tiffany CHAN, Tel: 2835 1600)	
Air Quality	
(a) Please provide justifications and discussion in a separate supporting document (i.e. an air quality impact assessment) including below information.	
(i) Please identify nearby roads and confirm the road type. The separation distance between air sensitive receiver of the proposed development and the nearby road should meet buffer distance requirements stated in Chapter 9 of HKPSG. These information/data shall be presented in form of an assessment report.	A qualitative Air Quality Impact Assessment has been prepared (Appendix VII refers). For details regarding nearby roads and road types, please refer to S2.3.4, S2.3.5 and Figure 2.1 of Appendix VII .
(ii) Please identify the chimneys in the surrounding of the subject site by site surveys and desktop review.	No active chimneys were identified within 200m of the Application Site during site visits in March 2023 and June 2025, as well as through desktop review. For details, please refer to S2.3.6 of Appendix VII .

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(b) Please review and revise relevant sections in the Planning Statement based on conclusion of the assessment.	The Supporting Planning Statement has been revised accordingly (Appendix I refers).
Noise	
(a) Table 1.1 and S.2.3.1	
(i) Please add "hotel" to the row elaborating the facilities in Table 1.1. Also, please clarify if there would be "clubhouse" or "lounge and function room" to be provided in the proposed development.	Table 1.1 and S2.3.1 of the Noise Impact Assessment (Appendix IV refers) have been revised to tally with the latest MLP. Clubhouse would be provided in the proposed development.
(ii) Please confirm in S.2.3.1 if the hotel would be provided with central air conditioning system and not rely on opened windows for ventilation.	Hotel would be provided with central air conditioning system and do not rely on openable window for ventilation. This has been supplemented in S2.3.1 (Appendix IV refers).
(b) S.3.4.1 - Similar to S.2.3.1, please spell out that the uses other than residential units would be provided with central air conditioning system and not rely on opened windows for ventilation.	S3.4.1 has been revised accordingly (Appendix IV refers).
(c) Appendix 2.1 - As commented before, the Transport Department's written endorsement on the adopted traffic forecast data should be attached to the NIA report for reference.	Transport Department's written endorsement on the adopted traffic forecast data is provided in Appendix 2.1 of the NIA Report (Appendix IV refers).
(d) Appendix 3.1 - Some newly identified fixed noise sources were not indicated on the corresponding catalogues. Please state for easy reference.	Appendix 3.1 of the NIA has been revised (Appendix IV refers). The catalogues for the following fixed noise sources have been updated: McQuay MCS185.1 for S46a-S46c, Carrier 30RB 040 for S7f-S7g and S9j, York YLCA 0040 T-TP for S9h-S9i, McQuay MCS200.2 for S8b, and McQuay MCS070.1 for S9e-S9g.

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Comments from Tsuen Wan and West Kowloon District Planning Office, Planning Department: (Contact Person: Ms Avis POON, Tel: 2417 6688)	
Table 3.1 and Para. 3.3.3 in Supporting Planning Statement – Compared with the previously approved scheme (No. A/K1/269), it is observed that one of the voluntary setbacks from the western boundary in the proposed scheme has been reduced from 3m to 2.3m. Hence, please clarify if the reduction of setback distance will lead to increases in overall site coverage and GFA calculations.	Setback distance of the southern boundary refers. Please note that the reduction of setback distance will not lead to increases in overall site coverage and GFA calculation since the minor difference has been absorbed in the rounding of numbers.
Comments from Urban Design and Landscape Section, Planning Department: (Contact Person: Mr Justin OR, Tel: 3565 3948)	
General Comment	
Please note below our comment on the Landscape Proposal (LP) from landscape planning perspective:	
a. Para. 1.2.3 – Discrepancy in the description of the current site situation is observed between this paragraph and para. 2.1.1 of the Supporting Planning Statement (SPS). Please review.	To tally with the Supporting Planning Statement, Para. 1.2.3 of the Landscape Proposal (Appendix V refers) has been revised to "The Application Site is currently vacant."
b. Para. 2.2.4 – Noting that the green roofs are only accessible by maintenance staff, such restriction should be specified in corresponding drawing, i.e. dwg no. LLP-01, for avoidance of doubt.	Additional annotation "Accessible by maintenance staff only" has been added on the drawing no. LLP-01.
c. Dwg No. LLP-01	

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Comments	S	Summary & Response
i.	Some major spot levels for landscape area are missing.	Major spot levels for landscape area are added on the drawing.
ii.	The applicant is advised to specify the width of the proposed planting area at the northern and southern boundaries of the site. It is observed that there are two exit doors connecting to the landscape area. The applicant is advised to indicate the minimum width of the means of escape included in the landscape area for reference. Moreover, please ensure that adequate space is provided to allow for the healthy growth of the proposed planting.	
iii.	The applicant is recommended to further explore the planting opportunity along Hankow Road to enhance the landscape quality and provide more greenery particularly at pedestrian level.	The project team has further reviewed the planting opportunity facing Hankow Road. However, in view of majority of the building frontage has already been occupied by access doors and escalators to enhance street vibrancy, and the pedestrian traffic along Hankow Road is expected to be high, the opportunity for planting has been maximized in the current layout. Nonetheless, the proposed planter on Hankow Road together with the two strips of proposed planting areas at the northern and southern boundaries are directly visible at pedestrian level and contribute a noticeable greenery
		effect for the pedestrian.
iv.	The applicant is advised to further explore opportunities for providing landscape furniture in the area between the RS&MRC room and the existing retaining wall, unless there are other constraints.	Benches have been added for enjoyment of the future users.
v.	Noting that approximately 28 meters of vertical greening is proposed along the western boundary between two building,	To ensure plants will grow properly on the vertical green wall, suitable shade tolerant species such as Nephrolepis auriculata (腎蕨),

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Comments		Summary & Response
	which may not receive sufficient sunlight, the applicant is advised to review the location of the proposed vertical greening. Additionally, the proposed planting species should be indicated in the relevant paragraph for reference.	Chamaedorea elegans (袖珍椰子), Philodendron cv. 'Lemon lime' (蔓綠 絨) etc. will be used. These plant species have proven successful establishment records in many covered landscape areas or even indoor projects in Hong Kong. In addition, grow lights for plants would also be setup where and if required.
		The proposed plant species have been highlighted in the revised Figure 2.1 in Para. 2.3.3 of the Landscape Proposal for reference (Appendix V refers).
	It is observed that three green roofs are proposed on the 3/F. However, only one green roof is provided with a door for maintenance purposes. Please clarify the configuration (accessible, with or without balustrade, planting soil depth, etc.) of these green roofs with illustration by section drawing.	A sectional drawing has been added on drawing no. LLP-05. For the other two green roofs without access door, the staff would use the Building Maintenance Unit to reach the green roofs for maintenance purpose.
d. <u>D</u>	 wg No. LLP-05 i. Please indicate the height of the existing retaining wall. 	The height of the existing retaining wall has been added on the drawing.
	ii. The applicant is advised to provide a sectional drawing to show the proposed green roof on 3/F.	Sectional drawing showing the proposed green roof on 3/F has been added on the drawing.
e. <u>D</u>	wg No. LLP-06 i. Some major spot levels are missing.	Major spot levels have been added on the drawing.
	ii. Please indicate the height of the proposed boundary fencing.	The height of the proposed boundary fencing has been added on the drawing.

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Comments	Summary & Response
Advisory Comment 1. The applicant is reminded that approval of the planning application under Town Planning Ordinance does not imply approval of tree preservation/removal scheme under lease. Thus, the applicant should seek comments and approval from the relevant authority on the tree works concerned and/or compensatory/replacement planting proposal, where appropriate.	Noted. Relevant authority on the tree works would be sought where appropriate.
2. Please be reminded that the approval of the Planning Application does not imply approval of the site coverage of greenery requirements under BD's PNAP APP-152 and/or under lease. The site coverage of greening calculation should be submitted separately to BD for approval.	Noted. The site coverage of greening calculation will be submitted separately to BD for approval.
Comments from Environmental Protection Department: (Contact Person: Ms. Tiffany CHAN, Tel: 2835 1600)	
Planning Statement	
1. Section 3.6.1 - Please review whether the manhole "FMH4 <u>0000</u> 707 (S1)" indicated in the paragraph shall be read as "FMH4 <u>000</u> 707 (S1)".	Noted and the typo has been revised accordingly (Appendix I refers).
Sewerage Impact Assessment (SIA)	
2. General Comment - The implementation of local sewer connection works shall meet the satisfaction of Drainage Services Department (DSD). The consultant should seek DSD's view and agreement on the SIA.	Noted.

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Comments	Summary & Response
3. Table 2.1 and Appendix 2.1 - The total estimated Gross Floor Area for hotel indicated in Table 2.1 and Appendix 2.1 (4964m²) does not tally with the Planning Statement (5083m²). Please review and clarify.	The GFA of the E&M floor on 17M/F (119 m²) has been included in the hotel's total GFA of 5,083 m². However, the GFA of the E&M floor has been excluded from the SIA calculation. Therefore, the adjusted GFA used for the hotel is 4,964 m².
4. Appendix 2.1 - For the manhole with unknown invert level (i.e. FMH4000707), please advise if manhole survey will be conducted to determine the actual invert levels and pipe capacity. If affirmative, please agree with DSD on the result of manhole survey and revise the hydraulic calculation based on the actual invert level of the concerned manhole when appropriate.	Manhole survey will be conducted at detailed design stage to verify the actual invert level and the hydraulic calculation will be updated as necessary.
Comments from Drainage Services Department: (Contact Person: Mr. CHEUNG Tsz-wai, Tel: 2300 1581)	
Please note that not only the sewage flows due to the proposed catchment sites, but also the existing/planned/committed sewage flows contributed from other catchment sites should be taken into account in the sewerage impact assessment in order to assess the potential sewerage impact and identify any mitigation measures required to be implemented. Please confirm with the SIG/EPD on the list of catchment sites contributing to the sewerage network under assessment, in particular, if any catchment sites not included in your assessment (e.g. Transit Nursery and Health Education Exhibition and Resource Centre, etc.) should however be included.	Please note that SIG/EPD does not have comment on the catchment sites. Nevertheless, the list of catchment sites has been updated to include Transit Nursery and Health Education Exhibition and Resource Centre in the revised calculation (Appendix VI refers).

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Comments from Urban Design and Landscape Section, Planning Department: (Contact Person: Mr. Justin HO, Tel: 3565 3937)	
1. Whether the 2.3m-wide setback is being measured from the western site boundary or the existing retaining wall, and review all the plans and sections across the submission accordingly;	Please note that the 2.3m-wide setback on lower floors (G/F to 2/F) is being measured from the existing retaining wall to demonstrate the relevant regulation(s) for detached buildings under the Building Ordinance has been fulfilled.
2. Whether private open spaces refer to communal open spaces and ensure consistency across the submission (paras. 3.1.2 and 3.2.2 refer);	Please note that "communal open spaces" has been revised to "private open spaces" across the submission.
3. The provision of communal open space at G/F is inconsistent in paras. 3.1.2 and 3.2.2, Table 3.2 and the application form;	Please note that private open spaces of not less than 219m ² would be provided at G/F and 18/F. All submission documents have been revised to reflect the same.
4. The provision of green roofs, as discussed in para. 3.2.3, should be indicated in Table 3.2 for clarity purpose;	The green roof has been incorporated in Table 3.2 of the Supporting Planning Statement (Appendix I refers).
5. Discussion on the proposed canopy structures of 1.5m-wide at 1/F and 2/F, where appropriate;	Discussion on the proposed canopy structures has been incorporated in Para. 3.3.4 of the Supporting Planning Statement (Appendix I refers).
6. The dimensions of the proposed building recesses at 3/F with indications on relevant plan(s)/section(s); and	The dimensions of the proposed building recesses at 3/F have been incorporated in the dwg. no. D01 (Appendix II refers).
7. Legends for the blue and light blue demarcations (3/F to 29/F floor plans refer).	Please note that the blue lines (3/F to 29/F floor plans at Appendix II refer) are indicating the curtain wall.

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Comments from Building Department: (Contact Person: Mr. Ivan CHAN, Tel: 2626 1523)	
1. Regarding the proposed composite building with building height over 61m on a Class A site, the proposed maximum non-domestic site coverage of 75% (as indicated in item (iv) of the "Gist of Application" in the Application Form) has exceeded the permissible limit as stipulated in the First Schedule of the Building (Planning) Regulations, which should be clarified/rectified by the applicant.	exceed 15m above ground level. Thus, this should be permissible under B(P)R 20(3).

Consolidated by: KTA Planning Limited

Date: 17 July 2025

List of Appendices

Appendix I Replacement Pages of Supporting Planning Statement

Appendix II Updated Architectural Drawings
Appendix III Revised Traffic Impact Assessment

Appendix IV Revised Noise Impact Assessment

 $\label{eq:Appendix V} \textbf{Appendix V} \quad \text{Replacement Pages of Landscape Proposal}$

Appendix VI Revised Sewerage Impact Assessment

Appendix VII Air Quality Impact Assessment