

Town Planning Application No. A/K5/876

Response-to-Comment Table (Departmental Comments)

Departmental Comments	Response																		
Transport Department received on 3.9.2025 by email from PlanD (Contact person: Mr. Leo POON at 2399 2478)																			
(a) In accordance with the HKPSG, the internal parking facilities i.e. parking requirement and loading/unloading requirements are different for the proposed usage “church” when compared to the original usage “retail”. As such, please request the application to provide the following:– i. The required provision of both usage under HKPSG;	Noted. The required provision of “church” and “retail” are summarised in the table below: <table><tr><th>Retail (about 360 m²)</th><th>HKPSG Requirements</th><th>HKPSG Required No.</th></tr><tr><td>Car Parking Space</td><td>1 car space per 150 – 300 m² GFA</td><td>2</td></tr><tr><td>Loading/Unloading</td><td>1 loading/unloading bay for good vehicles for every 800 to 1 200m² or part thereof, of gross floor area</td><td>1</td></tr></table> <table><tr><th>Church (Maximum of 180 seats)</th><th>HKPSG Requirements</th><th>HKPSG Required No.</th></tr><tr><td>Car Parking Space</td><td>Up to 1 car parking space for every 16 seats or equivalent</td><td>12</td></tr><tr><td>Loading/Unloading</td><td>1-2 bays (9m x 3m) for small coaches</td><td>1 to 2</td></tr></table>	Retail (about 360 m ²)	HKPSG Requirements	HKPSG Required No.	Car Parking Space	1 car space per 150 – 300 m ² GFA	2	Loading/Unloading	1 loading/unloading bay for good vehicles for every 800 to 1 200m ² or part thereof, of gross floor area	1	Church (Maximum of 180 seats)	HKPSG Requirements	HKPSG Required No.	Car Parking Space	Up to 1 car parking space for every 16 seats or equivalent	12	Loading/Unloading	1-2 bays (9m x 3m) for small coaches	1 to 2
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ii. The existing provision for the existing use;	The existing use does not include any car parking space and loading/unloading space.																		
iii. The proposed provision for the usage “church”; and	The proposed development does not include any car parking space and loading/unloading space.																		

<i>Departmental Comments</i>	<i>Response</i>
iv. The justification and the mitigation measures in the case of shortfall for the above provision, including but not limited to carrying out utilization surveys for the existing public car parking spaces/kerbside loading and unloading area nearby.	Justifications for the Shortfall 1. <u>Attendees of the Church Dominantly Adopt Foot Traffic</u> The proposed church is of a modest scale and is primarily intended to serve the immediate residential neighbourhood. Given its localized catchment and community-based function, it is anticipated that the majority of attendees will access the Application Premises on foot. This is expected to minimize vehicular traffic generation, thereby reducing potential impacts on local road capacity and parking demand. 2. <u>The Application Premises is Well-served by Public Transportation</u> This Application Premises is well served by various modes of public transport including MTR Tsuen Wan Line and Tuen Ma Line, bus and minibus within 10 minutes walking distance. Visitors can easily access the subject building by pedestrian paths from MTR, and bus terminus. 3. <u>No significant Traffic Stress on Weekdays</u> It is anticipated that the majority of attendees will visit the proposed church primarily on Saturdays and Sundays for worship activities. As such, the operation of the church will not generate significant traffic flows during weekdays. The limited operational schedule ensures that the proposed use would not impose significant additional traffic burden on the existing road and public transport system during working days, thereby maintaining the overall efficiency and capacity of the local transport network. Mitigation Measures A utilisation survey of public car parking facilities within a 200-metre radius of the Application Premises was undertaken to assess

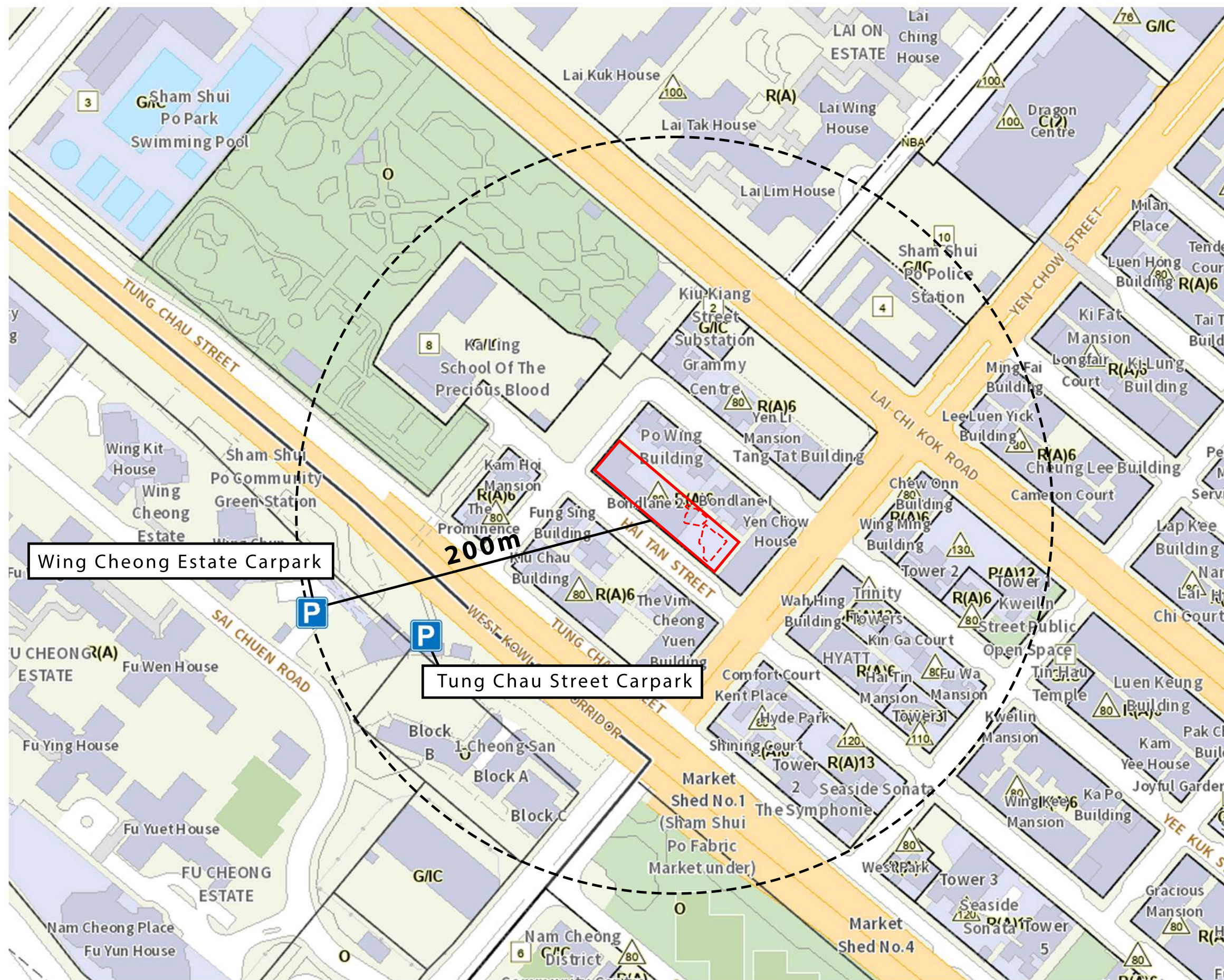
Departmental Comments	Response																		
	the adequacy of parking supply for attendees of the proposed church. The survey results demonstrate that sufficient parking spaces are available in the vicinity on Saturdays and Sundays to accommodate the expected demand generated by worship activities. For assessment purposes, Wing Cheong Estate Carpark and Tung Chau Street Carpark were selected (Attachment 1: Surrounding Carpark Location Plan & Attachment 2: Parking Provision Supplementary Information). The findings of the survey are summarised as follows: Wing Cheong Estate Carpark <table><tr><th></th><th>Total Car Parking Space</th><th>Vacant Carparking Space</th></tr><tr><td>Saturday (8:00 a.m.)</td><td>10</td><td>3</td></tr><tr><td>Sunday (8:00 a.m.)</td><td>10</td><td>4</td></tr></table> Tung Chau Street Carpark <table><tr><th></th><th>Total Car Parking Space</th><th>Vacant Carparking Space</th></tr><tr><td>Saturday (8:00 a.m.)</td><td>52</td><td>15</td></tr><tr><td>Sunday (8:00 a.m.)</td><td>52</td><td>7</td></tr></table> Based on the utilisation survey, the nearby public car parks provide sufficient vacant parking spaces to meet the requirements stipulated in the HKPSG for church use. Accordingly, the proposed church is not expected to generate any shortfall in parking provision. The availability of adequate parking, coupled with the high accessibility of the site by public transport and pedestrian networks, ensures that the operation of the church will not impose significant traffic stress on the existing transport system.		Total Car Parking Space	Vacant Carparking Space	Saturday (8:00 a.m.)	10	3	Sunday (8:00 a.m.)	10	4		Total Car Parking Space	Vacant Carparking Space	Saturday (8:00 a.m.)	52	15	Sunday (8:00 a.m.)	52	7
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	particularly during peak worship periods on Saturdays and Sundays. The proposed loading and unloading arrangements for the church are in full compliance with the standards set out in the HKPSG. Given that the provision meets the required specifications, no additional mitigation measures are considered necessary.
(b) As there is no existing parking space within the captioned site, the applicant should issue reminder/notice to all visitors that no parking space is available within the building and public transport should be taken as far as possible.	Noted. The Applicant will issue reminder/notice to all visitors that no parking space is available within the building and public transport should be taken. Please refer to Attachment 3 .
Planning Department received on 18.9.2025 by email from PlanD	
1. Para. 1.4 – Please advise the location of the Applicant’s existing church, and please clarify if the current planning application is to facilitate the relocation or expansion of the existing church.	The location of the Applicant’s existing church is 9/F, JD Mall, 233 Nathan Road, Jordon, Kowloon. The current planning application is to facilitate the expansion of the existing church in order to serve the people living in this district.
2. Para. 2.3.2 – Please advise if the staircase, escalator and lifts are exclusive for the commercial portion of the subject building (i.e. only connecting between G/F and 1/F of the subject building), and please annotate the staircase, escalator and lifts in Figure 2 for easy reference.	The staircase, escalator and lifts are exclusive for the commercial portion of the subject building. Please find attached the revised Figure 2 .
3. Para. 4.1.2 – a. Please advise if the proposed eating place at Shop R5 would provide services to the general public; if affirmative, please advise if the Applicant is planned to obtain relevant food business licence.	The proposed eating place at Shop R5 would not provide services to the general public. It would only be used for internal purpose and serve the attendees of the church with light food meal and refreshment.
b. Please advise if the co-working space would be used by the general public; if affirmative, please advise the operation details (e.g. whether the co-working space would be operated by reservation, and how many seats are available).	The proposed co-working space would not be used by the general public. It would only be used for internal purpose.
4. Para. 4.1.3 – Please supplement the services to be provided in the community services/workshops and youth learning activities.	Christian worship for elderly and youth and young couples will be developed for community services/ workshops. For youth learning activities, sport activity, tutorial class for students, Sunday class for Bible teaching will be provided.

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5. 2nd para. under Section 5.2 – Please advise if the applicant has considered other commercial buildings nearby.	The Applicant has undertaken a review of alternative sites within the surrounding area. However, no other locations were identified that could provide ideal spatial capacity to accommodate worship activities and serve the local community effectively. In view of these considerations, the Application Premises has been determined to be the most appropriate location.
6. 1st para. under para. 5.3 – Please supplement the services provided by the Applicant in the existing church in the past 15 years.	In the existing church, the Applicant has run Christian Service, Sunday school for kid and adult, fellowship for all ages in the past 15 years. Except these, the Applicant also performs social services in elderly home, sharing food and necessities for needy.
7. Section 5.6 – a. Please advise if there are any crowd management measures to prevent overflow of church visitors on 1/F of the subject building and on the public footpath of Hai Tan Street especially before/after the assemblies on Saturdays and Sundays (e.g. whether the visitors arrive/leave the church in a staggered manner, and any waiting space within the proposed church, etc.).	Participants will arrive and leave the proposed church in a staggered manner, and around 15 staffs and volunteers will assist in crowd management, thereby preventing any overflow of pedestrians onto the public footpath. The well-positioned access points across the Application Premises will enable a convenient access and smooth operation of the church.
b. Please advise if there are any noise control measures to avoid adverse impacts to the surroundings.	All church activities mostly as passive in nature will be carried out inside the Application Premises within the non-domestic shopping centre. The usage pattern of the church will not be excessively intense as most of the church activities will be conducted on Saturdays and/or Sundays. Moreover, being considerate to other people is always an important value in Christianity. Members are able to show self-discipline and self-supervision on their own acts to avoid confrontations and to control emission of noise to the neighbourhood. Active prevention measures, if necessary, will also be implemented. The Applicant will assign staff to monitor noise levels during worship services and events, including adjusting the volume of speakers and microphones as necessary, and reminding

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	attendees to lower their voices if noise levels become excessive. As a result, the proposed development would unlikely cause significant nuisance to nor conflicts with the existing residents of the subject building.
8. Figure 2 – Please annotate Shops L and R5 for easy reference.	Noted. Please find attached the revised Figure 2 .
9. Figure 3 – Please advise if the room at the top-right corner of Figure 3 is the room for small group meeting, and please add annotation for this room.	The room at the top-right corner of Figure 3 is for small group meeting. Please find attached the revised Figure 3 .
Planning Department received on 25.9.2025 by email from PlanD	
(a) Since the subject Premises is currently vacant, please advise the implementation program of the proposed church.	The proposed church is scheduled to sign the contract in November 2025 and commence operation in mid-January 2026.
(b) There are different churches of the Evangelical Free Church of China already in Sham Shui Po. Please advise the relationship between the applicant and these churches.	The Applicant and the other churches of the Evangelical Free Church of China are independent churches which only under the same organization. However, there are no connection between these churches.
The Hong Kong Police Force received on 25.9.2025 by email from PlanD	
For the proposal to be sustainable and minimize adverse impacts, the following measures are strongly recommended: (a) To Address Traffic and Parking: The applicant should develop and implement a comprehensive plan to actively encourage the use of public transit through detailed directions. The institution can explore providing franchised shuttle bus services from major transit hubs to significantly reduce reliance on private vehicles.	As discussed on 26.9.2025, we acknowledge and understand the concerns raised by the Hong Kong Police Force. Noted. The Applicant will issue reminder/notice to all visitors that no parking space is available within the building and public transport should be taken. The attendees of the church will follow the traffic regulation. Please refer to Attachment 3 .
(b) To Address Noise Nuisance: The applicant is encouraged to install professional soundproofing equipment within the premises to contain noise emissions effectively. Operational guidelines should be established to manage noise levels during peak hours, particularly on weekends, to ensure compliance with local environmental standards.	Noted. All church activities mostly as passive in nature will be carried out inside the Application Premises within the non-domestic shopping centre. As such, these activities will not interfere with or cause any disturbance to the residential areas of the building.

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(c) To Address The National Security Law: The applicant make sure that all activities in the premises need to comply with The National Security Law."	Noted. The Applicant undertakes that all activities to be carried out within the Application Premises will comply with the "The National Security Law."
Planning Department received on 30.9.2025 by email from PlanD	
1. It is noted that there are outdoor areas in the both Shops L and R5. Please advise if the visitors can access to the outdoor areas.	Visitors will not be permitted to access the outdoor areas of both Shops L and R5; such areas will be strictly restricted to staff use only.
2. Please advise the percentage of floor area of 1/F that the application Premises has occupied.	The percentage of the Application Premises GFA is about 30%.



DRAWING TITLE: Surrounding Carpark Location Plan	LEGEND:  Subject Building  Radius of 200m Distance  Application Boundary  Car Park	SCALE: N.T.S	PREPARED BY:  DeSPACE (International) Limited
DRAWING NUMBER: Attachment 1		DATE: September 2025	

20/09/2025 (Sat) 8:00 a.m.
Wing Cheong Estate Carpark Vacant Carparking Space: 3



21/09/2025 (Sun) 8:00 a.m.
Wing Cheong Estate Carpark Vacant Carparking Space: 4



Tung Chau Street Carpark Vacant Carparking Space: 15



Tung Chau Street Carpark Vacant Carparking Space: 7



DRAWING TITLE:
Parking Provision Supplementary Information

DRAWING NUMBER:
Attachment 2

SCALE:
N.T.S

DATE:
September 2025

PREPARED BY:



DeSPACE (International) Limited



交通安排通告

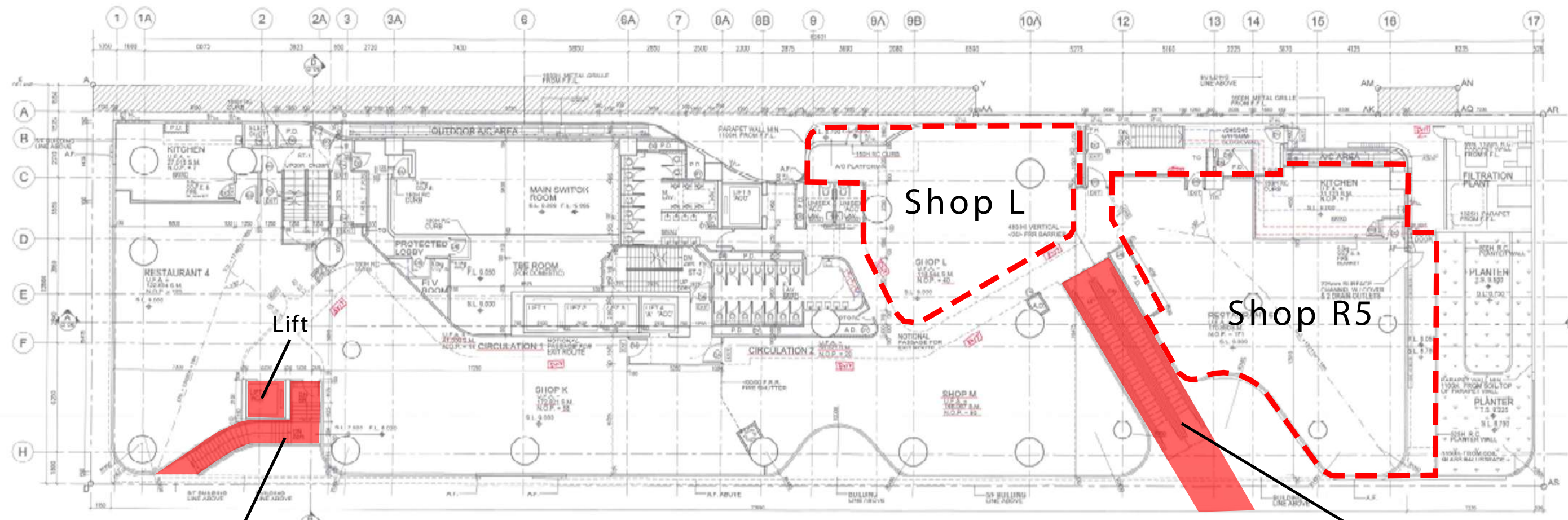
敬請各位會眾注意：

本堂所在大廈 不設任何泊車位。為確保崇拜聚會期間出入暢順及安全，請各位於星期六及星期日崇拜聚會時，盡量選用公共交通工具往返。

感謝各位弟兄姊妹及訪客的體諒與配合。



中國基督教播道會泉福堂 敬啟



1/F

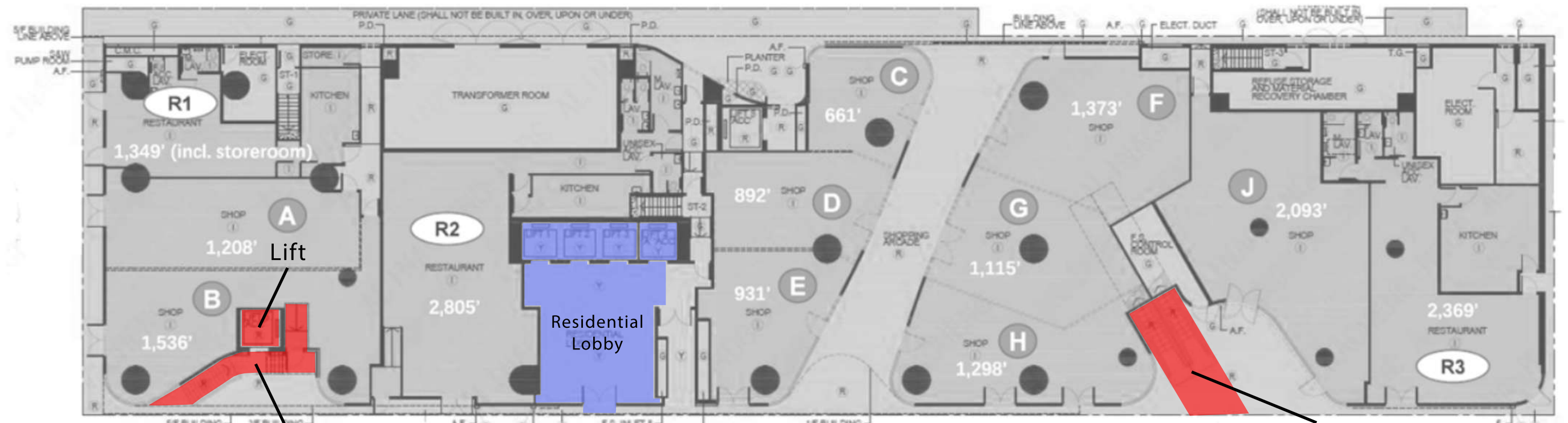
Staircase

Shop L

Shop R5

Escalator

Hai Tan Street



G/F

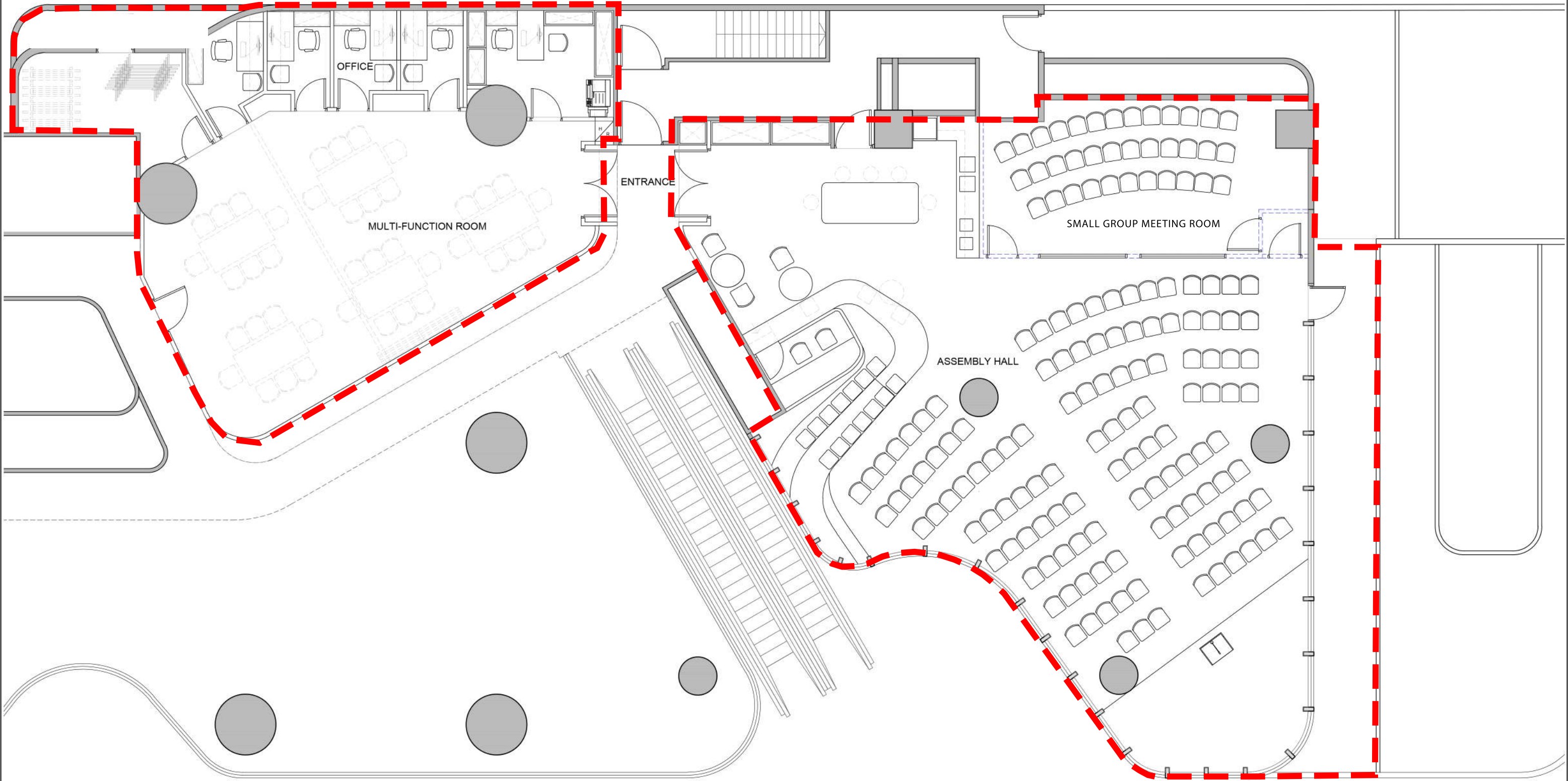
Staircase

Residential Lobby

Escalator

Hai Tan Street

DRAWING TITLE: Site Plan	LEGEND: Application Boundary Access of Residential Portion Access of Commercial Portion	SCALE: N.T.S	PREPARED BY:  DeSPACE (International) Limited
DRAWING NUMBER: Figure 2		DATE: August 2025	



DRAWING TITLE: Layout Plan	LEGEND: Application Boundary	SCALE: N.T.S	PREPARED BY:  DeSPACE (International) Limited
DRAWING NUMBER: Figure 3		DATE: August 2025	