

**Proposed Exhibition or Convention Hall within the Permitted In-situ Conversion for Residential Development cum Shop and Services/Eating Place in “Residential (Group A) 12” Zone  
No. 29 On Chun Street, Ma On Shan  
Sha Tin Town Lot No. 461  
(Planning Application No. A/MOS/131)**

Comments	Responses
<b>Comments from Environmental Protection Department (received on 3 September 2025) (Contact Person: Ms CHENG Hei-yu; Tel.: 2835 1845)</b>	
1. According to the information provided, the applicant intends to convert the existing hotel into a residential development with ‘Exhibition or Convention Hall’, ‘Shop and Services’ and ‘Eating Place’ uses at 29 On Chun Street, Ma On Shan. The subject of the application only involves ‘Exhibition or Convention Hall’ use, while the residential development with ‘Shop and Services’ and ‘Eating Place’ uses on the lowest three floors (the proposed development) is always permitted within the “Residential (Group A) 12” under the approved Ma On Shan Outline Zoning Plan No. S/MOS/28, and serves as indicative purpose only.	The proposed Exhibition or Convention Hall forms part of the in-situ conversion of the existing Hotel into the Proposed Residential Development cum Shop and Services/Eating Place. All relevant technical assessments have been carried out to assess the technical feasibility of the whole development covering all components upon conversion.
2. Based on the noise impact assessment submitted with the planning application, it is noted that the acoustic performance of the fixed noise sources associated with the application would be designed to meet the relevant criteria stipulated in the HKPSG. In this connection, we have no objection to the application from environmental planning perspective.	Noted.
3. Please find our observations below on Appendix 5 “Sewerage Calculation” of the planning statement for supporting the application: (a) 0.27m <sup>3</sup> /day should be adopted as the unit flow factor of domestic flow from the proposed development.	The sewerage calculation has been updated ( <b>Annex A</b> refers).
(b) The instantaneous peak flow from swimming pool should be included in the estimation of sewage flow.	The sewerage calculation has been updated ( <b>Annex A</b> refers).
4. In passing, please be reminded that a Noise Impact Assessment and a Sewerage Impact Assessment would be required for the proposed development under land lease conditions in relation to the previously approved S12A planning application No. Y/MOS/6.	Noted.

Comments	Responses
<b>Comments from Transport Department (received on 3 September 2025) (Contact Person: Mr Steve K W HO; Tel.: 2399 2408)</b>	
We have the following comment on the Planning Statement and Traffic Impact Assessment (TIA) report from traffic engineering and public transport operation point of view:-	
<b>(a) Comment on Planning Statement</b>	
(i) Para. 3.1.3: - a. Please clarify if the pedestrian footpath mentioned in para. 3.1.3 is referring to the private street as shown in the L1 Floor Plan in Appendix 1. If not, please indicate the proposed pedestrian footpath on a plan for our information.	The pedestrian footpath mentioned in para. 3.1.3 is referring to the private street as shown in the L1 Floor Plan at Appendix 1.
b. Please provide the traffic layout (in particular the connection/interface detail with the existing public road) of the proposed pedestrian/cyclist access with waterfront promenade/cycling track in north of the Site, which is opened up by your proposed pedestrian walkway.	The traffic layout of the proposed pedestrian/cyclist access with waterfront promenade/cycling track is included at <b>Annex B</b> refers.
c. There is actually a 2m width footpath along the northeast-bound cycle track fronting the Site. Your statement " <i>the cycling track fronting the Site is without a proper pedestrian footpath</i> " is factually incorrect. Please revise.	Noted. The statement has been deleted. Please refer to the replacement pages of the Planning Statement at <b>Annex B</b> .
(ii) Para. 3.2.1 – the location of the double decked mechanical car parking spaces as stated in para. 3.2.1 (i.e. at L1 open carpark area) is not consistent with what is shown on the drawings (at covered carpark). Please review and clarify.	Noted. The double deck mechanical car parking spaces are located at the covered carpark at L1 and para. 3.2.1 has been updated. Please refer to the replacement pages of the Planning Statement at <b>Annex B</b> .
(iii) Para. 4.5.2 – Please indicate the existing pedestrian connectivity and the future connectivity (with the proposed pedestrian walkway) with the surrounding area.	The existing and future pedestrian connectivity with the surrounding area is included at <b>Annex B</b> .
(iv) Para. 4.7.2: - a. Typo "abd" is observed in the 2 <sup>nd</sup> line of the paragraph. Please revise.	The typo has been rectified. Please refer to the replacement pages of the Planning Statement at <b>Annex B</b> .
b. I believe "railing service" in the 6 <sup>th</sup> line of the paragraph should be read as "rail services".	The typo has been rectified. Please refer to the replacement pages of the Planning Statement at <b>Annex B</b> .
<b>(b) Comment on TIA Report</b>	Replacement pages of the TIA report are included at <b>Annex C</b> .

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(i) Pedestrian Traffic Impact Assessment – As evening event at the proposed Exhibition or Convention Hall may be held, please include the case of assuming all pedestrian would be attracted to the proposed development at PM Peak for the pedestrian impact assessment and revise Section 4.8 to 4.11 of the report accordingly.	<p>Noted. As evening event may be held at the proposed exhibition or convention hall, it is assumed all pedestrians would be attracted to the proposed development at PM peak for conservative purposes.</p> <p>Please refer to updated Section 4.8 to 4.11 (attached replacement pages 13 – 18 of the TIA report) for details.</p>
(ii) Para. 4.11.3 – The quoted reference is outdated. Please obtain the 2024 Statistics for Tuen Ma Line in the latest “TLB’s reply to initial questions raised by Legislative Council Members in examining the Estimates of Expenditure 2025-26”. <a href="https://www.tlb.gov.hk/eng/legislative/transport/special/land/TLB-2-el_2025.pdf">https://www.tlb.gov.hk/eng/legislative/transport/special/land/TLB-2-el_2025.pdf</a>	The quoted reference is updated accordingly. Please refer to updated Section 4.11 (attached replacement pages 17 – 18 of the TIA report) for details.
(iii) Table 4.13 – The growth rate adopted for the patronage should be calculated from the relevant data in 2022, 2023 and 2024. Please revise.	Noted. The growth rate adopted is updated accordingly and presented in the footnote of Table 4.13 (attached replacement page 17 of the TIA report).
(iv) Section 4.11 – Please review if the latest figures for the PT demands of the proposed development has been used. It is noted that 744 persons/hr will be attracted while you only used the figure of pedestrian generation (i.e. 688 persons/hr) for your assessment. Please provide explanation to the adoption of such figures in your report.	Noted. Section 4.11 (attached replacement page 17 – 18 of the TIA report) is reviewed and updated accordingly.
(v) Table 5.2 – Please advise the number of visitor parking spaces out of the 150 car parking space and the 3 disabled car parking spaces. Please improve the presentation of the table.	Table 5.2 (attached replacement page 21 of the TIA report) is reviewed and updated accordingly.
<b>(c) Comment on the Floor Plan</b>	
(i) Please indicate the disabled parking space on the floor plan.	The disabled parking spaces have been indicated on the basement floor plan ( <b>Annex D</b> refers).
(ii) According to the Traffic Impact Assessment (TIA) Checklist for Development Project ( <a href="https://www.td.gov.hk/filemanager/tc/publication/tia%20checklist%20for%20development%20projects_202507.pdf">https://www.td.gov.hk/filemanager/tc/publication/tia%20checklist%20for%20development%20projects_202507.pdf</a> ), please review if 25% more on top of the HKPSG required provision of motorcycle parking spaces for residential development could be required.	On site observation revealed that there was no motorcycle illegally parked at On Chun Street. Therefore, 25% more on top of the HKPSG required provision of motorcycle parking spaces is not necessary.

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(iii) Further to comment item (c)(ii) above, it appears that more parking spaces could be provided without any change to the proposed carpark area. Please review the carpark layout to provide more parking spaces in the proposed development.	Noted. The increase in carpark number will be allowed under the flexibility clause of the land lease. Hence, the carpark layout will be further reviewed during GBP submission stage.
<b>Comments from Lands Department (received on 5 September 2025) (Contact Person: Alan KK TSIO; Tel.: 2158 4846 and Christy LY WONG; Tel.: 2155 2621)</b>	
<p>2. The existing Ma On Shan Horizon Suites Hotel is situated at Sha Tin Town Lot No. 461 ("the Lot") governed by New Grant No. 13008 ("the New Grant") subject to the following restrictions:</p> <p>(a) The Lot or any part thereof or any building or part of any building erected or to be erected thereon shall not be used for any purpose other than for hotel purposes ("Hotel Purposes") and the other purposes including the purpose of bank, fast food shop, place of public entertainment, private club and retail shop only ("Commercial Purposes"), which may only be accommodated within the first three floors above the ground level of the building erected or to be erected on the Lot.</p> <p>(b) Hotel Purposes shall not include service apartment purposes.</p> <p>(c) The total GFA permissible for the Lot under lease shall not exceed 56,000m<sup>2</sup>, of which the GFA for the Commercial Purposes shall not exceed 16,000m<sup>2</sup>.</p> <p>(d) Design and disposition (including external elevations and finishes) clause.</p> <p>(e) The prescribed parking, loading and unloading requirements for Hotel Purposes and Commercial Purposes under the New Grant.</p>	Noted.
<p>3. Lands Department's comments on the Submission.</p> <p><b>(a) <u>Comments from District Lands Officer/Shan Tin, Lands Department</u></b></p> <p>The "Exhibition or Convention Hall" on its own on L1/F under subject planning application is not permitted under lease. In fact, the Proposed Scheme for the proposed residential development cum shop/services/eating place as well as the "Exhibition or Convention Hall" as a whole as detailed in the Supporting Planning Statement (Para. 3) is not permitted under lease. If Town Planning Board approves the subject planning application, the owner of the</p>	Noted.

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<p>Lot is required to apply to Lands Department for a lease modification to implement the Proposed Scheme. The lease modification will take into account the planning approval obtained and the details of proposed development in the application, if any. Regarding this, please also refer to the comments from Land Supply Section, Lands Department below. Our office defers to other departments to comment on the technical assessments.</p>	
<p><b>(b) <u>Comments from Chief Estate Surveyor/Land Supply, Lands Department</u></b>  Our comments/observation based on the applicant's information as follows:-</p> <p>(i) It is noted that the subject planning application is confined to the proposed 'Exhibition or Convention Hall' use ("the Proposed Use"). In this regard, we are given to understand that the proposed residential development with shop and services, and eating place uses as presented in part 3 of the Supporting Planning Statement is not the subject of the current application and is for indicative purpose only.</p>	<p>Please note that this Planning Application includes a proposed Exhibition or Convention Hall as part of the in-situ conversion of an existing hotel into a residential development cum Shop and Services/Eating Place. Residential, shop and services and eating place are uses under Column 1 and therefore do not require TPB approval. However, it is important to highlight that the proposed Exhibition or Convention Hall is specifically located on L1 of the future converted development with its proposed size delineated on the plan. In addition, all technical assessments have been conducted based on this future converted development, making the application scheme-based in nature. The subsequent A&amp;A plan submission will follow the scheme including development parameters approved by the Town Planning Board (TPB).</p>
<p>(ii) We would like to clarify and reiterate that notwithstanding that an indicative development scheme has been demonstrated in support of the Proposed Use, in case if the proposed residential development would be implemented along with the Proposed Use, lease modification shall be required and shall be processed in accordance with the maximum development parameters as permissible for the Lot under the approved Ma On Shan Outline Zoning Plan No. S/MOS/28 ("the OZP") and in accordance with the approved planning permission, including but not limited to a maximum plot ratio of 7.0 within the "Residential (Group A) 12" zone under the OZP, instead of the demonstrated scheme with a maximum plot ratio of 6.353 in the subject planning permission. However, there is no guarantee that the lease modification application would be approved. Such</p>	<p>The Applicant would like to emphasize that the proposed redevelopment is based on a wholesale conversion of the existing hotel buildings, instead of demolishing the existing buildings to make way for private residential and commercial development. A feasibility analysis has been conducted with a conclusion that addition of extra GFA to attain plot ratio of 7.0 is infeasible under the current statutory control.</p>

Comments	Responses
application, if received, will be considered by Lands Department acting in its capacity as the landlord at its sole discretion and any approval given will be subject to such terms and conditions including, inter alia, payment of premium and administrative fee, as may be imposed by Lands Department.	

Compiled by: KTA

Date: 05 September 2025