

Appendix A

Responses-to-Comments Table

Proposed Hotel with Minor Relaxation of Plot Ratio and Building Height Restrictions at 46-48 Pak Tin Par Street, Tsuen Wan (Planning Application No. A/TW/546)

Responses to Comments – Departmental Comments

Page No. **Comments from Related Departments** Architectural Services Department, Architectural Branch, Advisory & Statutory Compliance Division. Buildings Department, New Buildings Division 1. New Territories West Section, dated 13 November 2025 Lands Department, Lands Administration Office, Development Control Section, Industrial Buildings Lands Department, Lands Administration Office, District Lands Office, Tsuen Wan and Kwai Tsing, dated Planning Department, District Planning Branch, Metro District Planning Division, Tsuen Wan and West Planning Department, District Planning Branch, Metro District Planning Division, Tsuen Wan and West Planning Department, District Planning Branch, Special Duties Division, Urban Design & Landscape 10. Planning Department, District Planning Branch, Special Duties Division, Urban Design & Landscape 11. Transport Department, NT Regional Office, Traffic Survey & Support Division, Tsuen Wan Section, dated

COMMENTS FROM RELATED DEPARTMENTS

COMM	COMMENTS FROM RELATED DEPARTMENTS			
No.	Comments	Responses		
1.	Architectural Services Department, Architectural Branch, Advisory & Statutory Compliance Division, dated 13 November 2025			
	1. Based on the information provided, it is noted that the proposed development mainly consists of one tower with an overall plot ratio (PR) of not more than 11.4 and a building height (BH) of 118.931mPD, which is a 20% and an 18.931% increase from the PR and BH restrictions as stipulated in the current Outline Zoning Plan respectively. From the photomontages provided, it appears that the proposal would not create additional visual impact to the surrounding environment when compared with a previously approved scheme. In this regards, we have no comment from architectural and visual impact point of view.	Noted.		
2.	Buildings Department, New Buildings Division 1. New Territories West Section, dated 13 November 2025			
	1. In Table 4.2.1 of the Supporting Planning Statement, it is noted that the podium height was proposed to be 20m above ground level with not more than 100% site coverage. The site coverage of non-domestic podium should not exceed that permitted under Regulation 20(3) of the Building (Planning) Regulations unless modification for relaxation of the height restriction on podium is granted in view of the functional requirements, site constraints, the impact on the environment, public interest and the likelihood of abuse at building plan submission stage.	Noted. The relaxation of site coverage under Building (Planning) Regulations would be applied for during the building plan submission stage.		
	2. The proposed plot ratio and site coverage shall not exceed the permissible under the First Schedule of the Building (Planning) Regulations (B(P)R).	Noted.		
	3. If the proposed plot ratio is based on the assumption that gross floor area (GFA) concessions will be granted (i.e.	Noted.		

No.	Comments	Responses
	excluding green/amenity features and non-mandatory/non-essential plant rooms and services from GFA calculations), the pre-requisites in Practice Note for Authorized Persons, Registered Structural Engineers and Registered Geotechnical Engineers (PNAP) APP-151 (e.g. BEAM Plus Certification) and sustainable building design guidelines (SBD Guidelines) set out in PNAP APP-152 should be complied with.	
	4. For the hotel portion, granting of hotel concessions is subject to compliance with the criteria laid down in PNAP APP-40.	Noted.
	5. Before any new building works (including containers / open sheds as temporary buildings, etc.) are to be carried out on application site, prior approval and consent of the Building Authority should be obtained, otherwise they are unauthorized building works (UBW) under the BO. An Authorized Person should be appointed as the coordinator for the proposed building works in accordance with the BO.	Noted.
	6. Any proposed building works should comply with the prevailing requirements under the BO and its allied regulations and Code of Practices.	Noted.
	7. Detailed comments will be given in the building plan submission stage.	Noted.
3.	Fire Services Department, dated 24 November 2025	
	1. I have no specific comment on the captioned application subject to water supplies for firefighting and fire service installations being provided to the satisfaction of the Director of Fire Services.	Noted.
	2. Detailed fire safety requirements will be formulated upon receipt of a formal submission of STT/STW, general building plans or referral of application via relevant licensing authority. Furthermore, the EVA	Noted.

No.	Comments	Responses
	provision in the captioned work shall comply with the standard as stipulated in Section 6, Part D of the Code of Practice for Fire Safety in Buildings 2011, which is administered by the Buildings Department.	
4.	Home Affairs Department, Licensing Authority, dated 13 November 2025	
	1. According to the Hotel and Guesthouse Accommodation Ordinance (Cap. 349) (HAGAO), "hotel" and "guesthouse" mean any premises whose occupier, proprietor or tenant holds out that, to the extent of his available accommodation, he will provide sleeping accommodation at a fee for any person presenting himself at the premises, unless all accommodation in the premises is provided for a period of 28 consecutive days or more for each letting which is exempted under the Hotel and Guesthouse Accommodation (Exclusion) Order (Cap. 349C).	Noted.
	2. If the mode of operation falls within the definition of "hotel" or "guesthouse" under the HAGAO, a licence under the HAGAO must be obtained before operation.	Noted.
	3. Under the HAGAO, hotel licence will only be issued for premises approved or accepted by the Building Authority (BA) for hotel use. The applicant should submit a copy of an occupation permit issued by the BA for the proposed hotel when making an application under the HAGAO.	Noted.
	4. Detailed licensing requirements will be formulated upon receipt of application under the HAGAO, if applicable.	Noted.
5.	Lands Department, Lands Administration Office, Development Control Section, Industrial Buildings Revitalisation Unit, dated 13 November 2025	
	Should the application be approved, the owner of the Lot is required to submit a land exchange or lease modification	Noted.

No.	Comments	Responses
	application to LandsD to implement the proposal. Upon receipt of the land exchange/lease modification application, it will be considered by LandsD acting in the capacity as landlord at its sole discretion. There is no guarantee that the application will be approved by LandsD. In the event that the application is approved, it will be subject to such terms and conditions as the Government shall see fit, including among others, the 5-year time limit for completion of the redevelopment, payment of full premium and administrative fee and other conditions applicable to the 2018 IBs Revitalisation Measures. Besides, the lease modification/land exchange shall be executed no later than 3 years from the date of approval letter.	
	2. The proposed hotel development falls within Section C of Tsun Wan Inland Lot No. 46 (the Lot) and does not comply with the existing lease conditions governing the Lot, including but may not be limited to user restriction.	Noted. Lease modification will be applied upon approval of the subject planning application by the Town Planning Board.
6.	Lands Department, Lands Administration Office, District Lands Office, Tsuen Wan and Kwai Tsing, dated 13 November 2025	
	1. The proposed hotel development does not comply with the existing lease conditions. If planning approval is given by the Board, the lot owner is required to apply to LandsD for a lease modification for the implementation of the proposed development. Upon receipt of the lease modification application, it would be considered by LandsD acting in the capacity as the landlord at its sole discretion. He would also advise that there is no guarantee that the application, if received by LandsD, will be approved and his office reserves comment on such. In the event that the application is approved, it will be subject to such terms and conditions as the Government shall see fit, including, among others, the	Noted.

No.	Comments	Responses
	payment of premium and administrative fee.	
	2. According to the latest Assignment dated 1.4.2021 registered in the Land Registry by Memorial No. 21042302200018, the sale transaction of the Lot was subject to certain exceptions and reservations of rights unto the adjoining section lots, which include the right-of-way within the Lot (i.e. Section C) and the right to the common use of the Septic Tank and the Transformer Room erected on the Lot to other portions of TWIL 46. The said exceptions and reservations of rights are not land lease requirement but private contractual requirements. The applicant should address such private contractual requirements amongst the concerned land owners for implementation of the proposed development.	Noted.
	3. The figures including the site area in the application have not been checked and are subject to verification which will be addressed when handling the application for lease modification.	Noted.
	4. His office reserves his comments on the proposed schematic design which would only be examined in detail during the building plan submission stage. There is no guarantee that the schematic design as presently proposed in the application if reflected in future building plan submission(s) will be acceptable under lease.	Noted.
7.	Planning Department, District Planning Branch, Metro District Planning Division, Tsuen Wan and West Kowloon District Planning Office, dated 11 November 2025	
	1. Please list the planning and design merits of the current scheme compared to the previous scheme in the approved application no. A/TW/529.	The Proposed Development for hotel use have retained all the planning and design merits committed under the approved application no. A/TW/529. They include a 1m full height setback along Pak Tin Par Street with canopy above G/F, terracing podium design with stepped setback from Pak Tin Par Street to create visual openness

No.	Comments	Responses
		and improve natural ventilation, curved building façade to create visual interest, a greenery coverage of about 26.76% that contributes to local amenity and enhances thermal comfort, the green roof at the sky garden to mitigate heat island effect, and the building setback from the right of way with greenery to enhance visual amenity along the right of way. The possibility of using recycled water for irrigation of the landscape features and BEAM Plus certification is also committed under the current application.
	2. Please clarify whether the greenery area from 1/F to 3/F and sky garden at 4/F are accessible and open to the general public.	Considering that the nature of the subject planning application is a hotel, the greenery area and sky garden will be open to hotel guests for privacy consideration.
8.	Planning Department, District Planning Branch, Metro District Planning Division, Tsuen Wan and West Kowloon District Planning Office, dated 24 November 2025	
	1. As shown in the section (drawing no. 2520-DWG-S01), floor-to-floor height of the typical floors of the proposed development is 3.602m. Please elaborate whether the floor-to-floor height is typical for hotel developments and compare with that of other hotels in the surroundings.	Please be advised that the typical floor of the proposed hotel has considered the following components: • Beam Depth: 0.95m • Services zone: 0.3m • Floor finishes thickness: 0.05m • Effective hotel headroom: 2.302m Total: 3.602m
		Taking into account the effective headroom is only about 2.302m, the proposed typical floor of the proposed development is considered reasonable.
		Please also refer to Sections 4.3.2 to 4.3.5 of the Revised Supporting Planning Statement (SPS) (Appendix B refers) for supplementary of the proposed building height of the Proposed Development.
9.	Planning Department, District Planning Branch, Special Duties Division, Urban Design & Landscape Section, Urban Design Unit, dated 11 November 2025	
	Comments on Planning Statement	

No.	Con	nments	Responses
	1.	Please note that lighting/light penetration is not under the purview of Planning Department.	Noted.
	2.	The applicant may wish to supplement whether the proposed sky garden at 4/F is open to public and the opening hours.	Considering that the nature of the subject planning application is a hotel, the greenery area and sky garden will be open to hotel guests for privacy consideration.
	3.	Appendix B (Summary of Planning and Design Merits) and Paras. 4.1.6, 4.3.5 and 5.5.4	
	_	Please consider removing the terms "enhance/improve localised microclimate", "improving microclimate" and "reduce wind gust" to avoid confusion.	Noted. They are now removed from Paras. 4.1.6, 4.3.8 and 5.5.4 of the Revised SPS as well as the Revised Summary of Planning and Design Merits (Appendix C refers).
	4.	Table 5.6.1(f), last bullet point	
	_	Please revise to read as "there would be no significant adverse visual impact"	Noted. The last bullet point of Table 5.6.1 (f) in the Revised SPS has been updated accordingly.
	5.	Para. 5.6.2 -	
	(i)	Please revise to read as "from 100mPD to 118.931mPD which "negligible" to "negligible to slightly adverse" impacts would result from the proposed increase in BH as demonstrated by the Visual Impact Assessment (Appendix E refers). The Proposed Development has also put" as per our comments on the VIA below.	We have reviewed the VIA and made appropriate updates. Please refer to Appendix D for the updated VIA.
	(ii)	Last line – Please revise to read as "no significant adverse visual impacts".	Noted. Para. 5.6.2 of the Revised SPS has been revised accordingly.
	Com	nments on VIA	
		As per TPB PG No. 41, the existing photos from all selected VPs without the proposed development/approved scheme should be supplemented.	Noted. The photos reflecting existing conditions have been supplemented under Figures 3 to 10 of the Revised Visual Impact Assessment (VIA) (Appendix D refers).
	2.	Photomontages –	

No.	Com	ments	Responses
	(i)	The Consultant should confirm if the bulks of the proposed development and the approved scheme have been accurately reflected on photomontages.	It is confirmed that the bulk of the Proposed Development have been accurately reflected on photomontages. For the images of the approved scheme, they
			are extracted from the VIA report attached to the planning application No. A/TW/529 approved with conditions by the Town Planning Board.
	(i	i) VPs 7 and 8 (Figures 9 and 10) – The BH of the proposed development at 118.931mPD should be annotated on the photomontages.	Noted, The BH of the Proposed Development has been annotated in Figures 9 and 10 of the Revised VIA.
	3.	Para. 3.1.6, last line	
	_	Please consider removing the term "improving microclimate" to avoid confusion.	Noted. This has been removed from para. 3.1.6 of the Revised VIA.
	4.	Table 4.1	
	_	As TPB PG-No. 41 focuses on the protection of public views, the mention of occupational receivers should be removed.	Noted. The mention of occupational receivers has been removed from Table 4.1 of the Revised VIA.
	<u>VP2</u>		
	5.	Para. 4.1.5	
	_	It should be reviewed whether the rating of sensitivity of "High" is overrated and should be revised as "Medium" instead.	Noted. The rating of sensitivity of VP2 has been revised as "medium" in para. 4.1.5 of the Revised VIA.
	6.	Para. 5.1.6, 1st to 2nd lines	
	_	It should be reviewed whether "passing by the footbridge above Sha Tsui Road" should refer to Tai Chung Road instead.	Noted. Para. 5.1.6 of the Revised VIA has been rectified.
	<u>VP4</u>		
	7.	Para. 5.1.15	
	_	It should be supplemented that sky view also forms part of the visual composition in the background.	Noted and supplemented accordingly in para. 5.1.15 of the Revised VIA.
	<u>VP7</u>		
	8.	Para. 4.1.10	

No.	Comments	Responses
	 It should be reviewed whether the rating of sensitivity of "High" is overrated and should be revised as "Medium" instead. Paras. 5.1.29 to 5.1.33 	Noted. The sensitivity of VP7 has been revised as "medium" in para. 4.1.10 of the Revised VIA.
	 As there would be minor additional obstruction to the open sky per the submitted photomontages, it should be reviewed whether there would be negligible to slightly adverse visual impacts overall and in all respective aspects. 	As shown in Figure 9 of the Revised VIA, the Proposed Development would only result in slightly adverse impacts on visual obstruction from VP7, which could be further mitigated by measures such as architectural articulation and colour tone design in detailed design stage. Meanwhile, negligible impacts on visual composition, public viewers and visual resources are anticipated. Hence, it is anticipated that there would be negligible visual impacts overall from VP7.
	<u>VP8</u>	
	10. Paras. 5.1.35 to 5.1.39	
	 As there would be minor additional obstruction to the open sky per the submitted photomontages, it should be reviewed whether there would be negligible to slightly adverse visual impacts overall and in all respective aspects. 	Noted. As shown in Figure 10 of the Revised VIA, the Proposed Development would result in slightly adverse impacts on visual obstruction from VP8, which could be further mitigated by measures such as architectural articulation and colour tone design in detailed design stage. Para. 5.1.36 of the Revised VIA has been revised accordingly.
		Meanwhile, negligible impacts on visual composition, public viewers and visual resources are anticipated. Hence, it is anticipated that there would be negligible visual impacts overall from VP8.
	<u>Conclusion</u>	
	11. Table 5.1 and Paras. 6.1.3	
	 The table and the conclusion of the VIA should be revised based on comments above, in that the identified visual impact ranges from "negligible" to "negligible to slightly adverse". 	Table 5.1 has been revised accordingly under the Revised VIA based on our above responses to comments (9) and (10).
	12. the site coverage of greenery requirements under APP- PNAP 152 and/or under the Lease. The site coverage of greening	Noted.

No.	Comments	Responses
	calculation should be submitted separately to BD for approval.	
	Comments on Air Ventilation	
	1. According to the Expert Evaluation and Advisory Report for an Instructed Project for Tsuen Wan Area (AVR/G/65), the subject site does not fall within any identified breezeways/air paths. Based on the currently available information, the proposed development would unlikely fall within the criteria as set out under the Housing, Planning and Lands Bureau and Environment, Transport and Works Bureau Joint Technical Circular on AVA No. 1/06, and significant adverse impact on pedestrian wind environment is not anticipated.	Noted.
	Existing, Planned/Committed Developments	
	1. SPS (Para. 2.4.4) and VIA (Para. 2.2.1, 3 rd bullet point)	
	 It should be reviewed whether King Palace Plaza is 30 storeys instead of 32 storeys. 	Please be clarified that based on the information from Open3Dhk, King Palace Plaza includes a 4-storey podium and 28-storey tower. Hence, there are a total of 32 storeys.
	2. VIA, Figure 5, Approved Scheme	
	 It should be reviewed whether the annotations for Metropolitan Factory and Warehouse Building and Million Fortune Industrial Centre have been mixed up. 	Noted. Please be advised that the photomontages under the Approved Scheme are extracted from the VIA attached to the approved application No. A/TW/529 approved by the Town Planning Board.
10.	Planning Department, District Planning Branch, Special Duties Division, Urban Design & Landscape Section, Landscape Unit, dated 13 November 2025	
	1. 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	Noted.

No.	Comments	Responses
	compensatory/replacement planting proposal, where appropriate.	
	2. 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 greenery calculation should be submitted separately to BD for approval.	Noted.
	3. The applicant should ensure the adequate soil depth provided for the proposed planting and the planting works on 4/F is feasible in a heavy shaded condition.	Noted.
11.	Transport Department, NT Regional Office, Traffic Survey & Support Division, Tsuen Wan Section, dated 13 November 2025	
	Comment on TIA	
	1. Section 4.2 - Traffic Generation for the Previous Approved Scheme and the Proposed Hotel Development	
	The applicant should advise the peak traffic volumes entering into and exiting from the development.	Please note that the peak hour traffic generation and attraction of the Proposed Hotel Development is shown in Section 4.2 of the submitted Traffic Impact Assessment (TIA). The Proposed Hotel Development will generate a two-way traffic of 84 pcu and 86 pcu during the AM peak hour and PM peak hour, respectively.
	2. Section 3.3. and 4.6 - Junction Capacity Assessment	
	a. The following road junctions and road should be included in the Junction Capacity Assessment:	Noted. The concerned junctions are included in the junction capacity assessment accordingly, except the junction of Tai Ho
	Castle Peak Road – Tsuen Wan / Tsuen King Circuit	Road / Yeung Uk Road, as the development traffic is not anticipated to pass through this junction. The anticipated ingress and egress routings for the development traffic are
	Castle Peak Road – Tsuen Wan / Sai Lau Kok Road	shown in Figure 3.1 of the Revised TIA (Appendix E refers).
	Castle Peak Road - Tsuen Wan / Tai Ho Road	Please refer to Sections 3.3 and 4.6 of the Revised TIA for the updated junction capacity assessment results.
	Sha Tsui Road / Hoi Hing Road	capacity accessificate results.

No.	Comments	Responses
	Sha Tsui Road / Tai Ho Road	
	Tai Ho Road / Yeung Uk Road	
	Pak Tin Par Street	
	3. Section 5.1 - Access Arrangement	
	a. The width of the proposed run-in/out should be clearly indicated on the drawing;	Noted. The width of the proposed run-in/out is 7.0m and is indicated on the drawing accordingly. Please refer to the Appendix C of the Revised TIA. Please also refer to the Replacement Page of Revised Architectural Layout of the Proposed Development that also indicates the width of the proposed run-in/out (Appendix F refers).
	b. Please indicate the in/out arrangement at the vehicular access;	Please refer to Appendix C of the Revised TIA for the vehicular access arrangement.
	c. Please conduct swept path analysis (e.g. coaches) to demonstrate the safe and smooth manoeuvring of the vehicles assessing from/to Pak Tin Par Street at the development site.	Noted. Swept path analysis is conducted accordingly to demonstrate the safe and smooth manoeuvring of the vehicles assessing from/to Pak Tin Par Street at the development site. Please refer to the Supplementary Information (Appendix G refers) for the swept path Figures SP-01 to SP-02 for details.
	4. Section 5.2 - HKPSG Requirements in Car Parking and Loading/Unloading Provisions	

No.	Comm	ents	Responses		
	a.	The applicant proposed the provision of GV loading/unloading spaces with the low-end provision under HKPSG. The applicant should justify the proposed provision of loading/unloading spaces. Otherwise the applicant should provide adequate loading/unloading facilities for the proposed uses;	According to the operating of similar hotels with less than 300 rooms, the loading/unloading demand for these hotels is very minimal. In general, the normal operation of a hotel will induce loading/unloading demand because of the activities as shown in the table below, which also shows the subsequent recorded/estimated loading/unloading trips.		
			Activity	Loading /unloading Demand	Required Duration
			Regular Delivery of Consumables	Maximum 1 trips per day	5 minutes
			Out-source Laundry Service	1 trips per day	10 minutes
			Total	Not more than 2 trips per day	-
			frequency, loading/unload	the small load the provision ling spaces will mand of the prop	of two be sufficient
			is about 18m shorter side) to only. Given providing the accommodate lift core and remaining are internal transpedriveway /turn no. of HGV L	otly, the dimensing (Width) x 29rd 37m (Length at the small site necessary flow the entrance lobble M&E facilities and a space. The pour facilities and the optimum arrows the optimum arrows the small street of the space and the optimum arrows the space and the space are spaced to the space and the spaced to the space	n (Length at at longer side) e area, after for space to by, staircases, ies etc., all allocated for a dassociated provision of 1 l no. of LGV
	b.	Please adopt "shared-use" dimensions for the coach parking space;	will follow Po	mension of all t int 3 (g), Staten , Volume 8 of the	nent of Intent
	c.	Please show the coach picking-up/setting-down bay at the hotel;		at the picking-up ted on the coach	-
	d.	Please demonstrate sufficient queuing spaces at carpark entrance and waiting	driveway bety	at there is arou ween the turnta which can acc	able and the

No.	Comments	Responses	
	spaces for the turntable under norm operation;	private cars when the turntable is in operation.	
	e. Please provide the turntable assessmer illustrate how the HG loading/unloading bay could be used during the maintenance and break-down of turntable, and queuing analysis with the carpark for justifying the handling capability of HGV, i.e. no tail back and queue affecting the carpark operation and Pak Tin Par Street. In addition, please ensure no parking and obstruction on the turntable as well as its propositioning. Moreover, please implement only loading/unloading at of peak.	the turntable, the hotel/car park management will post notices on suitable locations and inform the possible users that coaches/HGVs cannot enter the building. Coaches/HGVs are advised to conduct the pick-up/dropoff/loading/unloading along the hotel frontage at Pak Tin Par Street on a temporary basis. Furthermore, the maintenance of the turntable will be scheduled on a regular basis at night time and avoid the peak traffic of coaches/HGVs.	
	5. Pedestrian Facilities		
	a. Pedestrian Planning Framework shou be applied as stipulated in TPDI Volume 6 Chapter 10.		
	 Provision of crossing facilities should be considered in the TIA to facilitate the pedestrian movements between the hot and nearby attractions such as The Mill 	Pak Street at the at-grade cautionary crossing near Tai Chung Road.	
	6. Building Setback		
	a. The building setback should be provided to fulfil the three-zone concept stipulated in HKPSG as well as the Greening Zone requirement in DEV Technical Circular (Works) No. 3/202 If the space requirements of Greening Zone cannot be met, the project proponents may apply for exemption from the Works and Maintenant Committee on Greening.	Development Bureau Technical Circular (Works) No. 3/2024, it is stated that: " It applies to all new road projects in the Public Works Programme, during the feasibility, planning, design and construction stages. Rehabilitation	
	7. Others		

Proposed Hotel with Minor Relaxation of Plot Ratio and Building Height Restrictions at 46-48 Pak Tin Par Street, Tsuen Wan (Planning Application No. A/TW/546)

Responses to Comments – Departmental Comments

No.	Comments		Responses	
	a.	The design of the development including but not limited to provision of footpath should comply with the latest Outline Development Plan and the relevant design requirements.	The design of the development has complied with the latest Outline Development Plan, under which no setback from Pak Tin Par Street is required for the Application Site.	

(Last updated 26 November 2025)