

# Appendix A

## Responses-to-Comments Table

## Comments from Related Departments

Page No.

<b>COMMENTS FROM RELATED DEPARTMENTS .....</b>	<b>2</b>
1. Culture, Sports and Tourism Bureau, Tourism Commission, Team 2, dated 12 December 2025 .....	2
2. Drainage Services Department, Operations & Maintenance Branch, Mainland South Division, Mainland South 2(Tsuen Wan, Kwai Chung West and Tsing Yi), Tsuen Wan West, dated 18 November 2025 .....	2
3. Environmental Protection Department, Environmental Assessment Division, Territory North Group, Tuen Mun & Tsuen Wan, dated 13 November 2025 .....	2
4. Environmental Protection Department, Environmental Assessment Division, Territory North Group, Tuen Mun & Tsuen Wan, dated 26 November 2025 .....	3
5. Planning Department, District Planning Branch, Metro District Planning Division, Tsuen Wan and West Kowloon District Planning Office, dated 4 December 2025 .....	5
6. Planning Department, District Planning Branch, Special Duties Division, Urban Design & Landscape Section, Urban Design Unit, dated 4 December 2025 .....	6
7. Transport Department, NT Regional Office, Transport Operations (NT) Division, NT South West Section, 25 November 2025 .....	7
8. Transport Department, NT Regional Office, Traffic Survey & Support Division, Tsuen Wan Section, 12 December 2025.....	7

**COMMENTS FROM RELATED DEPARTMENTS**

No.	Comments	Responses
1.	<p><b>Culture, Sports and Tourism Bureau, Tourism Commission, Team 2, dated 12 December 2025</b></p> <p>1. The Tourism Commission welcomes initiatives that are conducive to the long term and sustainable development of the tourism industry in Hong Kong. To support and sustain the growing momentum of the tourism industry and maintain the city's attractiveness to visitors, a stable and sufficient supply of hotel rooms is very important. Therefore, we support the Application which will provide new and more hotel rooms and facilities to offer additional accommodation options to our visitors and enhance the tourism offering of Hong Kong.</p>	<p>Noted.</p>
2.	<p><b>Drainage Services Department, Operations &amp; Maintenance Branch, Mainland South Division, Mainland South 2(Tsuen Wan, Kwai Chung West and Tsing Yi), Tsuen Wan West, dated 18 November 2025</b></p> <p>(i) It may be required to assess and demonstrate the potential sewerage impact to the existing sewerage system, and formulate appropriate mitigation measures if any adverse sewerage impact is identified.</p> <p>(ii) <b>Section 4.2.3</b> - For pipe with diameter exceeding 375mm, either PE pipes (PE100-RC) or precast concrete pipes with Polyvinyl Chloride (PVC) or equivalent lining is required.</p>	<p>Please note that potential sewerage impact to the existing sewerage system has been assessed and appropriate mitigation measures including drainage upgrading have been included in the submitted Sewerage Impact Assessment (SIA).</p> <p>Noted. Note (1) of Section 4.2.3 has been revised in the Revised SIA (<b>Appendix B</b> refers) as below: <i>“Proposed sewer pipe material will be precast concrete pipes with” O” ring joints with Polyvinyl Chloride (PVC) or equivalent lining”</i>.</p>
3.	<p><b>Environmental Protection Department, Environmental Assessment Division, Territory North Group, Tuen Mun &amp; Tsuen Wan, dated 13 November 2025</b></p> <p>1. In view of the past use with a transformer room at the ground level, land contamination assessment has been conducted and completed under the approval condition of the previous application no. A/TW/529, identifying</p>	<p>Noted.</p>

No.	Comments	Responses
	<p>no land contamination. The finding is relevant for reference in the current application involving the same site.</p> <p>2. It is noted that the proposed hotel will provide 299 guest rooms in sewered area. Hotel developments are normally provided with central air conditioning system and the Applicant / Authorised Persons should be able to select proper location for fresh air intake during detailed design stage to avoid exposing future occupants under unacceptable environmental nuisances / impacts.</p> <p>3. We have no objection to the subject application, subject to the approval condition below:</p> <p>The applicant shall within 6 months of the approval date of this application submit a Sewerage Impact Assessment (SIA) for the approval of the Director of Environmental Protection or the Town Planning Board. The applicant shall be responsible to implement the local sewerage upgrading / sewerage connection works as recommended in the approved SIA report.</p>	<p>Noted.</p> <p>Noted.</p>
4.	<p><b>Environmental Protection Department, Environmental Assessment Division, Territory North Group, Tuen Mun &amp; Tsuen Wan, dated 26 November 2025</b></p> <p><b>Annex A Calculations of Sewage Generation</b></p> <ul style="list-style-type: none"> <li>● <u>1B Estimation of Sewage Flow from the Proposed Development:</u> <ul style="list-style-type: none"> <li>– The content does not tally with Section and Table 3-1. Please revise.</li> </ul> </li> <li>● <u>28 The mills (41-47 Pak Tin Par Street):</u> <ul style="list-style-type: none"> <li>– The total GFA of(i)-(iii) appears to be substantially lower than <a href="https://www.atal.com/project/nam-fung-icxtile-mills/">the actual GFA</a> (https://www.atal.com/project/nam-fung-icxtile-mills/), Please review.</li> </ul> </li> </ul>	<p>Noted. The previous Section 1B has been removed from Annex A of the Revised SIA (<b>Appendix B</b> refers) for clarity, while no change has been made to the section and Table 3-1.</p> <p>Annex A of the Revised SIA (<b>Appendix B</b> refers) is updated with “Data retrieved from SIA submitted and accepted for S16 submission under Case No. TPB/A/TW/529</p>

No.	Comments	Responses
	<ul style="list-style-type: none"> <li>– Please advise what is the " Fashion Gallery &amp; Design Training Centre" referring to.</li> <li>● <u>Generation from Catchment A:</u></li> <li>– Please remove the segregation between 28 and 2C, if 2C is also part of Catchment A.</li> <li>● <u>2C Goodwill Industrial Building (36-44 Park Tin Par Street):</u></li> <li>– Please advise how is the GFA of the building derived.</li> <li>● <u>3A Wah Lik Industrial Centre (459-469 Castle Peak Road - Tsuen Wan):</u></li> <li>– Please advise how is the GFA of the building derived.</li> <li>● <u>38 Wah Wai Industrial Building (53-61 Pak Tin Par Street):</u></li> <li>– Please advise how is the GFA of the building derived.</li> <li>● <u>4 TCL Tower (8 Tai Chung Road):</u></li> <li>– Please advise how is the GFA of the building derived.</li> </ul> <p><b>Annex C Assessment of Public sewers – Existing Conditions with Upgrading</b></p> <ul style="list-style-type: none"> <li>● As advised in the Sewerage Manual, the roughness value for "slimed sewers" should be used for designing sewerage. Please review the roughness coefficient (ks) of the sewers with proposed upgrades.</li> </ul>	<p><i>in year 2022. Buildings within the catchment areas remain unchanged".</i></p> <p>Noted. The segregation line has been removed from Annex A of the Revised SIA (<b>Appendix B</b> refers).</p> <p>Please refer to the response to the above comment on 28 The mills (41-47 Pak Tin Par Street).</p> <p>Please refer to the response to the above comment on 28 The mills (41-47 Pak Tin Par Street).</p> <p>Please refer to the response to the above comment on 28 The mills (41-47 Pak Tin Par Street).</p> <p>Please refer to the response to the above comment on 28 The mills (41-47 Pak Tin Par Street).</p> <p>Please note that (ks) for proposed precast concrete pipes with PVC lining for drainage upgrade is 0.0006m (or 0.6mm) as "poor" condition in accordance with Table 5: Recommended roughness values, Sewerage Manual issued by DSD. Roughness coefficient for the existing pipes is adopted from SIA submitted and accepted for S16 submission under Case No. TPB/A/TW/529 in year 2022. The buildings within the catchment areas remain unchanged.</p>

No.	Comments	Responses						
	<p><b>General</b></p> <ul style="list-style-type: none"><li>Please submit the excel tables of calculation for reference.</li><li>Please revisit the hydraulic assessment based on the above comments and revise relevant parts of the SIA report.</li><li>Please be reminded that the implementation of local sewer connection shall meet the satisfaction of DSD.</li></ul> <p><b>1. Comments from Environmental Protection Department</b> (Contact Person: Ms. Jolene WONG // Tel: 2835 1844)</p> <table><tr><td>Annex A Calculations of Sewage Generation</td><td><ul style="list-style-type: none"><li><b>1B Estimation of Sewage Flow from the Proposed Development:</b><ul style="list-style-type: none"><li>The content does not tally with Section and Table 3-1. Please revise.</li></ul></li><li><b>2B The mills (41-47 Pak Tin Par Street):</b><ul style="list-style-type: none"><li>The total GFA of (i)-(iii) appears to be substantially lower than the <u>actual GFA</u> (<a href="https://www.atal.com/project/nam-fung-textile-mills/">https://www.atal.com/project/nam-fung-textile-mills/</a>). Please review.</li><li>Please advise what is the "Fashion Gallery &amp; Design Training Centre" referring to.</li></ul></li><li><b>Generation from Catchment A:</b><ul style="list-style-type: none"><li>Please remove the segregation between 2B and 2C, if 2C is also part of Catchment A.</li></ul></li><li><b>2C Goodwill Industrial Building (36-44 Pak Tin Par Street):</b><ul style="list-style-type: none"><li>Please advise how is the GFA of the building derived.</li></ul></li><li><b>3A Wah Lik Industrial Centre (459-469 Castle Peak Road – Tsuen Wan):</b><ul style="list-style-type: none"><li>Please advise how is the GFA of the building derived.</li></ul></li><li><b>3B Wah Wai Industrial Building (53-61 Pak Tin Par Street):</b><ul style="list-style-type: none"><li>Please advise how is the GFA of the building derived.</li></ul></li><li><b>4 TCL Tower (8 Tai Chung Road):</b><ul style="list-style-type: none"><li>Please advise how is the GFA of the building derived.</li></ul></li></ul></td></tr><tr><td>Annex C Assessment of Public sewers – Existing Conditions with Upgrading</td><td><ul style="list-style-type: none"><li>As advised in the Sewerage Manual, the roughness value for "slimed sewers" should be used for designing sewerage. Please review the roughness coefficient (ks) of the sewers with proposed upgrades.</li></ul></td></tr><tr><td>General</td><td><ul style="list-style-type: none"><li>Please submit the excel tables of calculation for reference.</li><li>Please revisit the hydraulic assessment based on the above comments and revise relevant parts of the SIA report.</li><li>Please be reminded that the implementation of local sewer connection shall meet the satisfaction of DSD.</li></ul></td></tr></table>	Annex A Calculations of Sewage Generation	<ul style="list-style-type: none"><li><b>1B Estimation of Sewage Flow from the Proposed Development:</b><ul style="list-style-type: none"><li>The content does not tally with Section and Table 3-1. Please revise.</li></ul></li><li><b>2B The mills (41-47 Pak Tin Par Street):</b><ul style="list-style-type: none"><li>The total GFA of (i)-(iii) appears to be substantially lower than the <u>actual GFA</u> (<a href="https://www.atal.com/project/nam-fung-textile-mills/">https://www.atal.com/project/nam-fung-textile-mills/</a>). Please review.</li><li>Please advise what is the "Fashion Gallery &amp; Design Training Centre" referring to.</li></ul></li><li><b>Generation from Catchment A:</b><ul style="list-style-type: none"><li>Please remove the segregation between 2B and 2C, if 2C is also part of Catchment A.</li></ul></li><li><b>2C Goodwill Industrial Building (36-44 Pak Tin Par Street):</b><ul style="list-style-type: none"><li>Please advise how is the GFA of the building derived.</li></ul></li><li><b>3A Wah Lik Industrial Centre (459-469 Castle Peak Road – Tsuen Wan):</b><ul style="list-style-type: none"><li>Please advise how is the GFA of the building derived.</li></ul></li><li><b>3B Wah Wai Industrial Building (53-61 Pak Tin Par Street):</b><ul style="list-style-type: none"><li>Please advise how is the GFA of the building derived.</li></ul></li><li><b>4 TCL Tower (8 Tai Chung Road):</b><ul style="list-style-type: none"><li>Please advise how is the GFA of the building derived.</li></ul></li></ul>	Annex C Assessment of Public sewers – Existing Conditions with Upgrading	<ul style="list-style-type: none"><li>As advised in the Sewerage Manual, the roughness value for "slimed sewers" should be used for designing sewerage. Please review the roughness coefficient (ks) of the sewers with proposed upgrades.</li></ul>	General	<ul style="list-style-type: none"><li>Please submit the excel tables of calculation for reference.</li><li>Please revisit the hydraulic assessment based on the above comments and revise relevant parts of the SIA report.</li><li>Please be reminded that the implementation of local sewer connection shall meet the satisfaction of DSD.</li></ul>	<p>Remarks (*) are added to Annex B &amp; Annex C of the Revised SIA (<b>Appendix B</b> refers) for clarity.</p> <p>Noted. The excel tables have been separately sent to your office via email.</p> <p>Please note that there is no change in hydraulic calculation. The changes under the Revised SIA (<b>Appendix B</b> refers) have been highlighted in blue for clarity.</p> <p>Noted.</p>
Annex A Calculations of Sewage Generation	<ul style="list-style-type: none"><li><b>1B Estimation of Sewage Flow from the Proposed Development:</b><ul style="list-style-type: none"><li>The content does not tally with Section and Table 3-1. Please revise.</li></ul></li><li><b>2B The mills (41-47 Pak Tin Par Street):</b><ul style="list-style-type: none"><li>The total GFA of (i)-(iii) appears to be substantially lower than the <u>actual GFA</u> (<a href="https://www.atal.com/project/nam-fung-textile-mills/">https://www.atal.com/project/nam-fung-textile-mills/</a>). Please review.</li><li>Please advise what is the "Fashion Gallery &amp; Design Training Centre" referring to.</li></ul></li><li><b>Generation from Catchment A:</b><ul style="list-style-type: none"><li>Please remove the segregation between 2B and 2C, if 2C is also part of Catchment A.</li></ul></li><li><b>2C Goodwill Industrial Building (36-44 Pak Tin Par Street):</b><ul style="list-style-type: none"><li>Please advise how is the GFA of the building derived.</li></ul></li><li><b>3A Wah Lik Industrial Centre (459-469 Castle Peak Road – Tsuen Wan):</b><ul style="list-style-type: none"><li>Please advise how is the GFA of the building derived.</li></ul></li><li><b>3B Wah Wai Industrial Building (53-61 Pak Tin Par Street):</b><ul style="list-style-type: none"><li>Please advise how is the GFA of the building derived.</li></ul></li><li><b>4 TCL Tower (8 Tai Chung Road):</b><ul style="list-style-type: none"><li>Please advise how is the GFA of the building derived.</li></ul></li></ul>							
Annex C Assessment of Public sewers – Existing Conditions with Upgrading	<ul style="list-style-type: none"><li>As advised in the Sewerage Manual, the roughness value for "slimed sewers" should be used for designing sewerage. Please review the roughness coefficient (ks) of the sewers with proposed upgrades.</li></ul>							
General	<ul style="list-style-type: none"><li>Please submit the excel tables of calculation for reference.</li><li>Please revisit the hydraulic assessment based on the above comments and revise relevant parts of the SIA report.</li><li>Please be reminded that the implementation of local sewer connection shall meet the satisfaction of DSD.</li></ul>							
5.	<p><b>Planning Department, District Planning Branch, Metro District Planning Division, Tsuen Wan and West Kowloon District Planning Office, dated 4 December 2025</b></p> <p>1. Please provide additional planning justifications for the proposed hotel development, such as preference of hotel to office in previous application, territorial and district hotel demand, locational advantages of Tsuen Wan and Chai Wan Kok etc.</p>	<p>Based on the Hotel Room Occupancy Reports in October 2024 and October 2025, the hotel room occupancy rate from January to October in Hong Kong has continued to increase from 81% in 2023 to 84% in 2024 to 86% in 2025, showing an increase in hotel demand. In view of the Government’s policy</p>						

No.	Comments	Responses
		<p>support for tourism development as discussed in Section 3.5 of the Supporting Planning Statement (SPS), it is anticipated that the territorial hotel demand would continue to increase in the future.</p> <p>Based on the Hotel Room Occupancy Report in October 2025 published by Hong Kong Tourism Board, the occupancy rate of the hotel rooms in New Territories, within which the hotels in Tsuen Wan are located, is 89% during the period from January to October 2025, which is higher than that in districts such as Central/ Western (83%), Wan Chai (82%), Tsim Sha Tsui (87%) and Island (72%). With the launch of the “Tourism is Everywhere” initiatives, an increase in hotel demand in Tsuen Wan would be anticipated which would require further provision of hotel rooms.</p> <p>In terms of the location of the Application Site, it is in close proximity to the Mills which showcases the local textile history, and with high accessibility as discussed under Sections 2.4 and 2.5 of the submitted SPS. the Application Site is also located near D·PARK with a broad range of restaurants and shops, recreational facilities and exhibition areas, which shapes an interesting visitor experience.</p> <p>The Application Site and Tsuen Wan in general also serve as a suitable base to explore the nearby Tai Mo Shan, which is a destination for green tourism as stated under Section 3.5.2 of the SPS.</p> <p>Please refer to Sections 2.4.2, 2.5.3, 2.5.4, 3.5.4, 3.5.5 and 5.2.1 of the Revised SPS (<b>Appendix C</b> refers) for more details.</p>
6.	<p><b>Planning Department, District Planning Branch, Special Duties Division, Urban Design &amp; Landscape Section, Urban Design Unit, dated 4 December 2025</b></p> <p>1. We have no further comment on the FI dated 27.11.2025.</p>	<p>Noted.</p> <p>Please note that Table 3-1 under the Replacement Pages in the Revised Visual</p>

No.	Comments	Responses
		Impact Assessment ( <b>Appendix F</b> refers) has been updated to include a remark on the GFA of the facilities proposed to be disregarded for GFA calculation (subject to BD's comment in detailed design stage), in order to tally with Table 4.2.1 of the Revised SPS ( <b>Appendix C</b> refers). Please note that the GFA proposed to be disregarded in the detailed design stage have already been included in the building bulk submitted earlier for technical assessment purpose.
7.	<p><b>Transport Department, NT Regional Office, Transport Operations (NT) Division, NT South West Section, 25 November 2025</b></p> <ol style="list-style-type: none"> <li>1. The consultant should review the walking distance from the development to the existing bus / GMB stops, and assess the walkability for passengers traveling with luggage.</li> <li>2. The consultant should review the current utilisation of the relevant public transport services at the respective peak loading point during peak hours.</li> </ol>	<p>Please note that the walking distance between the nearest two stops and the proposed hotel is around 115m (Tai Chung Road northbound bus stop) and 250m (Tai Chung Road southbound bus stop). Please refer to Figure 3.3 of the Revised Traffic Impact Assessment (TIA) (<b>Appendix D</b> refers) for the anticipated pedestrian routings.</p> <p>The proposed development is for hotel use and it is anticipated that most hotel guests will use private transport modes, such as taxis, private light buses and coaches as the main transportation. There will be limited amount of hotel guests using public transport services during peak hours. Therefore, it is not expected to induce significant traffic impact to the public transport services in the vicinity. Nevertheless, please refer to Section 4.7 of the Revised TIA (<b>Appendix D</b> refers) for the utilization of relevant public transport routes.</p>
8.	<p><b>Transport Department, NT Regional Office, Traffic Survey &amp; Support Division, Tsuen Wan Section, 12 December 2025</b></p> <ol style="list-style-type: none"> <li>1. <b>Section 3.3. and 4.6 - Junction Capacity Assessment</b> <ol style="list-style-type: none"> <li>a. The junction Tai Ho Road / Yeung Uk Road should be included in the Junction Capacity Assessment as there is anticipated travel demand between the proposed hotel and Tsuen Wan West</li> </ol> </li> </ol>	<p>The junction capacity assessment is updated accordingly. Please refer to Chapter 3 and Chapter 4 of the Revised TIA (<b>Appendix D</b> refers) for details.</p>



No.	Comments	Responses
	<p>Station, and the relevant ingress and egress route should be shown on Figure 3.1.</p> <p><b>2. Section 5.1 - Access Arrangement</b></p> <p>a. Based on the swept path analysis, both HGVs and coaches will occupy both traffic lanes and more than half of the run in/out, please advise how to control the vehicle in/out during the operation.</p> <p><b>3. Section 5.2 - HKPSG Requirements in Car Parking and Loading/Unloading Provisions</b></p> <p>a. Please adopt “shared-use” dimensions for the coach parking space (i.e. 12000(L)x3500(W)x4700(H);</p> <p>b. Please show the coach picking-up/setting-down bay at the hotel;</p> <p>c. Please demonstrate sufficient queuing spaces at carpark entrance and waiting spaces for the turntable under normal operation;</p> <p>d. In order to ensure road safety and maintain sufficient sightline for the in/out vehicles, no pick-up, drop-off, loading and unloading activities should be conducted at the hotel frontage near the run-in/out at all time, including the break-down period of the turntable; associated traffic aids (including but not limited to “KEEP CLEAR” and double yellow road markings) should be submitted to TD for approval in design stage.</p> <p>e. The current situation/occupancy of the nearby lay-by should be reviewed to ensure the pick-up/drop-off/loading/unloading activities is feasible at the lay-by when needed.</p>	<p>The probability to have an HGV and a coach using the run-in/out simultaneously will be very slim. Meanwhile, the carpark management staff will provide assistance when there is a long vehicle enter/exit the run-in/out.</p> <p>Noted. “Shared-use” dimensions (i.e. 12000(L)x3500(W)x4700(H) are adopted for the coach parking space.</p> <p>The picking-up/setting-down will be conducted on the coach space and the passenger’s routing to the lobby is shown in Figure 5.2 of the Revised TIA (<b>Appendix D</b> refers).</p> <p>Please refer to Figure 5.2 of the Revised TIA (<b>Appendix D</b> refers) for the queuing area within the carpark for the turntable under normal operation.</p> <p>Associated traffic aids (including but not limited to “KEEP CLEAR” and double yellow road markings) will be submitted to TD for approval during the detailed design stage.</p> <p>The proposed hotel provides sufficient internal transport facilities in accordance with the HKPSG requirements. Therefore, it is not anticipated to induce on-street pick-up/drop-off/loading/unloading demand at the nearby lay-by.</p>

No.	Comments	Responses
	<p><b>4. Pedestrian Facilities</b></p> <p>a. The existing cautionary crossing near Tai Chung Road is away from the hotel and is in the opposite direction to The Mills. Please reconsider the provision of crossing facilities.</p> <p><b>5. Others</b></p> <p>a. In order to prevent illegal parking on footpath at the hotel frontage, traffic aids such as bollards should be submitted to TD for approval in design stage.</p> <p>b. Please supplement figures on the existing utilisation of the relevant public transport routes with anticipated increase in passenger demand arising from the proposed hotel development, in particular the routes plying to/from the airport.</p>	<p>Noted. A cautionary crossing is proposed at the location as shown in Figure 5.1 of the Revised TIA (<b>Appendix D</b> refers).</p> <p>Traffic aids such as bollards will be submitted to TD for approval during the detailed design stage.</p> <p>Noted. Please refer to Section 4.7 of the Revised TIA (<b>Appendix D</b> refers) for the utilization of relevant public transport routes.</p>

(Last updated 15 December 2025)