Section 12A Application - To rezone the application site from "Commercial", "Open Space" and an area shown as 'Road' to "Residential (Group A) 13" at Sha Tin Town Lot 482, 16 Po Tai Street, Ma On Shan (Application No. Y/MOS/8)

Response to Departmental Comments Table

No.	Comments Received	Our Responses
A. Comments from District Lands Office, Lands Department (LandsD) (Subject Officer: Ms Candice TSOI; Tel: 2158 4747)		
Date: 25 August 2026		
i.	The application site falls within Sha Tin Town Lot No. 482 ("the Lot") which is held under New Grant No. 21599 dated 12.7.2013 ("the New Grant"). Under the New Grant, the Lot is restricted to non-industrial (excluding residential, godown and petrol filling station) purposes and is subject to, inter alia, a maximum GPA of 15,270 sq.m. and a maximum building height of 30m above HKPD. The proposed redevelopment comprising residential flats cum child care centre and commercial space is not acceptable under the existing lease.	Kindly note that the Applicant will apply for lease modification to modify the Government Lease for subsequent redevelopment after approval of the rezoning application.
ii.	In the event the subject application under s.12A of the Town Planning Ordinance ("TPO") is accepted or partially accepted by the Town Planning Board ("TPB") with a set of clear development parameters (including but not limited to the proposed user, gross floor area and car parking provisions, as appropriate) defined/firmed up and further submission to the TPB (including application(s) for permission under s.16 of the TPO after the corresponding amendment to the Outline Zoning Plan (OZP) has been made) is not required, the land owner may submit request for streamlined processing of lease modification application. Depending on the circumstances of each case, LandsD at its sole and absolute discretion may, upon receipt of such valid request and subject to payment of the administrative fee(s) (including fee payable to the Legal Advisory and Conveyancing Office, if required) by the land owner, commence	Noted.

No.	Comments Received	Our Responses
	the streamlined processing of these lease modification application on a without prejudice and non-committal basis while PlanD is taking forward the relevant OZP amendment.	
iii.	The land owner is reminded that once the accepted or partially accepted proposal is reflected in the OZP and approved under 3.9 of the TPO, a formal application for lease modification by land owner to LandsD is still required. Every application submitted to LandsD will be considered on its own merits by LandsD at its absolute discretion acting in its capacity as a landlord and there is no guarantee that the lease modification application will eventually be approved by LandsD. If the application for lease modification is approved by LandsD, it will be subject to such terms and conditions as may be imposed by Lands D at its absolute discretion, including payment of premium and administrative fee(s).	Noted.
iv.	It is noted that the proposed development would provide aboveground carpark on 3/F and whether the proposed aboveground carpark would be exempted from GFA calculation from the lease perspective would be examines at the building plan processing stage.	Noted.
v.	For the technical assessments, we would defer to other expertise departments to offer comments.	Noted.
B. Comments from Urban Design & Landscape Section, Planning Department (Urban Design and Visual Perspectives) (UD&L/PlanD) (Subject Officer: Ms. Grace CHEUNG; Tel: 3565 3936)		
Date: 25 August 2026		
i.	We have no adverse comments on the application from urban design and visual perspectives. Detailed comments are as follows:	/
	a) being located near the waterfront area, the application site (the Site) is surrounded by clusters of high-rise residential developments with building heights (BHs)	Noted.

No.	Comments Received	Our Responses
	ranging from about 80mPD to 110mPD. To its east across Sai Sha Road and the elevated Tuen Ma Line are several public housing developments situated in further inland with BH up to about 124mPD. The proposed development with a maximum BH of 100mPD is considered not entirely incompatible with the surrounding built environment, and the stepped BH profile from waterfront towards the inland area could largely be maintained;	
	b) the proposed design measures, including building setbacks and greening/landscaping measures, are considered to have urban design merits; and	Noted.
	c) a Visual Impact Assessment (VIA) has been conducted to assess the potential visual impact arising from the proposed development. According to the VIA, the overall visual impact of the proposed development would range from 'negligible' to 'moderate' for the selected public viewing points (VPs) when compared to the existing conditions. These mitigation measures would help alleviate the potential visual impact to certain extent.	Noted.
ii.	Some observations on the submitted Planning Assessment Report (PAR) and VIA are set out below:	/
	PAR	/
	a) **Paras. 5.2.1, 5.2.2 and Figure 10 –** it is noted that the applicant proposed a further setback of about 6m from the existing 15m-wide non-building area (NBA) along the northern boundary (i.e. a total 21m), and a setback of about 22m from Sai Sha Road. These setbacks/NBA should be clearly indicated on Figure 10 for better presentation. There may be a need to clarify whether the	**Figure 10** of **Planning Assessment Report** has been revised accordingly. Please refer to the latest indicative scheme. There is no amendment to the existing NBA under the rezoning proposal.

No.	Comments Received	Our Responses
	proposed 21m-wide NBA is part of the rezoning proposal. There is also a typo on Figure 10 where the NBA should read 21m instead of 22m;	
	VIA	/
	b) **Paras. 4.2.6, 4.2.10, 4.2.11, 5.6.1 and 5.7.1 –** VP1, VP5, and VP6 are located to the northwest, south, and west of the Site respectively;	**Sections 4.2.6, 4.2.10, 4.2.11, 5.6.1 and 5.7.1** of **Visual Impact Assessment (VIA) (Appendix 7)** have been revised accordingly.
	c) **Para. 5.3.1 (VP2) –** with reference to the photomontage at Figure 5b, the upper portion of the proposed development is visible from VP2. Hence, the description of 'none of the Proposed Development could be visible at this VP under the current indicative scheme' is inaccurate;	**Section 5.3.1** of **VIA** has been revised accordingly.
	d) **Para. 5.6.4 (VP5) –** with reference to the photomontage at Figure 5e, the proposed development is visually prominent and would lead to obstruction of the sky view. Hence, the description of 'the visual impact of the Proposed Development will be mitigated by design features… which would be seamlessly integrated with the surrounding area and may even enhance the visual quality with the proposed landscape feature' is inaccurate; and	**Section 5.6.4** of **VIA** has been revised accordingly.
	e) **Para. 6.1.3 –** according to the visual assessment, the overall visual impact of the proposed development should be 'from negligible to moderate'.	**Section 6.6.1 of Planning Assessment Report** and **Section 6.1.3** of **VIA** have been revised accordingly.
C. Comments from Urban Design & Landscape Section, Planning Department (Urban Design and Visual Perspectives) (UD&L/PlanD) (Subject Officer: Ms. Grace CHEUNG; Tel: 3565 3936)		
Date: 25 August 2026		
i.	We have no adverse comments on the application from landscape planning perspective. Our detailed comments are as follows:	/

No.	Comments Received	Our Responses
	a) based on the aerial photos taken in 2024 and 2025, the Site was situated in an area of residential urban landscape character comprising residential and commercial developments, parking areas, a promenade and scattered tree groups. The proposed development is considered not incompatible with the surrounding environment;	Noted.
	b) according to the Landscape Proposal and Tree Preservation Proposal (Appendix 2) and the RtoC table, two existing trees of common species will be retained and 61 news trees will be planted to maximise greening opportunities within the Site,. Landscape mitigation measures including open and covered landscape areas, podium landscape garden and green roofs are proposed;	Noted.
	c) in view of the above, significant adverse landscape impact arising from the application is not anticipated;	Noted.
Advisory Comments		/
ii.	Approval of the application does not imply approval of tree works such as pruning, transplanting and felling. The applicant is reminded to seek approval for any proposed tree works from relevant departments prior to commencement of the works.	Noted. Based on the **Landscape Proposal and Tree Preservation Proposal (Appendix 2)**, two nos. of existing *Terminalia mantaly* (*細葉欖仁*) are proposed to be retained in situ. No pruning, transplanting or felling works are currently proposed. Should any tree works be required at a later stage, approval will be sought from the relevant departments prior to commencement of works.
iii.	The applicant is reminded that approval of the application does not imply approval of the site coverage of greenery requirements under PNAP APP-152. The site coverage of greenery calculation should be submitted separately to Building Department (BD) for approval.	Noted. Calculation of site coverage of greenery will be submitted separately to BD for approval in accordance with PNAP APP-152.
D. Comments from Social Welfare Department (SWD) (Subject Officer: Ms. Doris LEUNG; Tel: 3691 8500)		

No.	Comments Received	Our Responses
Date: 25 August 2026		
The comment under SWD in the applicant's R-to-C table is not related to SWD. SWD's comments were provided to the applicant on 10.6.2026 and 25.6.2026 respectively.		The RtC table regarding SWD's comments received on 10 June and 25 June 2026 has been submitted separately.
E. Comments from Environmental Protection Department (EPD) (Subject Officer: Ms. CHENG Hei Yiu; Tel: 2835 1845)		
Date: 25 August 2026		
i.	Based on the submitted Environmental Assessment and Sewerage Impact Assessment (SIA), it is noted that:	/
	• There will be sufficient buffer distances between the nearby roads (Sai Sha Road and Po Tai Street) and air-sensitive uses of the proposed redevelopment, in accordance with the requirements stipulated in the Hong Kong Planning Standards and Guidelines. No adverse impacts from vehicular emissions would be anticipated.	Noted.
	• The proposed redevelopment will be subjected to railway noise from Tuen Ma Line and road traffic noise. With the implementation of the proposed mitigation measures, including baffle-type acoustic windows and enhanced acoustic windows, and fixed glazing, no adverse noise impacts on the proposed redevelopment would be anticipated.	Noted.
	• The proposed redevelopment will be connected to the existing sewerage system via a proposed sewerage main along Sai Sha Road. The downstream sewerage system has adequate capacity to cater for the sewage generated from the proposed redevelopment. No adverse sewerage impacts would be anticipated.	Noted.

No.	Comments Received	Our Responses
	• No potentially contaminating issues have been identified on the application site based on current and historic uses.	Noted.
ii.	Considering the above, insurmountable environmental and sewerage impacts arising from the proposed redevelopment are not anticipated and we have no objection to the application from environmental planning perspective.	Noted.
iii.	To identify and ensure the implementation of appropriate mitigation measures for the proposed redevelopment, relevant clauses on Noise Impact Assessment and SIA should be imposed under the land lease. Nonetheless, if the developer could confirm that the sewage flow estimation and conclusions in the SIA submitted with the application remain valid for project implementation, re-submission of SIA will not be required.	Noted.
F. Comments from Leisure and Cultural Services Department (LCSD) (Subject Officer: Ms. Carol CHOY; Tel: 3167 7743)		
Date: 25 August 2026		
i.	It is noted that the area zoned 'Open Space' in the proposed development is about 0.2% (around 11 sq. m according to verbal advice from PlanD) located at the edge of the boundary only.	Please refer to **Section 2.2.1 of Planning Assessment Report** regarding the remark 1 at the bottom.
ii.	Considering that there are leisure venues in the vicinity (e.g. Ma On Shan Promenade and Hang Ming Street Sitting-out Area), LCSD has no particular comment on the proposed development as far as sufficient Open Space has been reserved on the relevant outline zoning plan to cater for the long-term need of the projected population.	Noted.
The following departments have no objection to/comment on the application: - Geotechnical Engineering Office (GEO), Civil Engineering and Development Office		Noted.

No.	Comments Received	Our Responses
- North Development Office (NDO), Civil Engineering and Development Office - Drainage Services Department - Highways Department - Water Supplies Department		
G. Comments from Sha Tin, Tai Po and North District Planning Office, Planning Department (PlanD) ***(Subject Officer: Mr. Brandon HUNG; Tel: 2158 6232)***		
Date: 28 August 2026		
Re the submission for application No. Y/MOS/8, please find our comments from district planning perspective:		/
General Comments		/
1.	Compared with the previous pre-submission submitted on 28.5.2026, the major development parameters, including plot ratio (PR), gross floor area (GFA), building height (BH), no. of flats, estimated population, car parking provisions, as well as building layout, remain the same in the current submission.	Please refer to the updated **Indicative Architectural Drawings** in **Appendix 1**. **Table 2** of **Planning Assessment Report** regarding the proposed development parameter has also been updated.
2.	For the ramp design, alternative arrangements are advised to be discussed in the relevant report(s) to justify the current scheme.	The design of helical ramp has been updated. Please refer to the updated **Indicative Architectural Drawings** in **Appendix 1**. To ensure the Proposed Development is visually compatible to the surrounding environment, design of ramp has been incorporated with the green space on 2/F and 3/F so as to provide sufficient landscape treatment along the boundary and to minimize the potential visual impact of the built form.
3.	The elongated single block design of the proposed development has triggered strong objection from the public. Apart from the visual impact as per our previous comments, such a building form may create potential wall effect, obstructing natural ventilation and sunlight from the adjacent neighborhood. In addition, it may affect the microclimate environment and amplify the urban heat island effect. Please justify your building	Please refer to the latest **Indicative Architectural Drawings** in **Appendix 1**. Kindly note that there are two residential towers atop the commercial podium under the latest scheme. Several design merits have been proposed, including provision of building setbacks, tally with the stepped building height profile concept in Ma On Shan district, etc., in order to respect the existing

No.	Comments Received	Our Responses
	block design, and consider enhancing the design or impose any mitigation measures, if needed.	NBA and is expected to enhance the south-east and north-west air paths of the area to improve air penetration and visual permeability of the area. Further design consideration including extensive greening will be taken into account in the later detail design stage.
Specific Comments		/
Planning Statement		/
4.	Para. 3.6: The commercial sites in Shek Mun were not planned for residential developments through rezoning but s.16 planning application (i.e. No. A/ST/1053). Please rectify.	**Section 3.5.1 of Planning Assessment Report** has been revised accordingly.
5.	Para. 3.7: 'Hotel' use is always permitted within the "Commercial" zone on the Ma On Shan Outline Zoning Plan (OZP), which does not require rezoning of the site. Considerations and requirements applicable to hotel/student hostel use differ from that of residential use, and therefore the case is not relevant to the subject application.	**Section 3.5.2 of Planning Assessment Report** has been revised accordingly.
6.	Para. 5.1.6: Regarding the GFA concession on the aboveground car park, we shall defer to the relevant departments (e.g. Lands Department, Buildings Department, Transport Department, etc.) to comment/confirm.	Noted.
7.	Para. 5.1.9:	/
	i. It is noted that the proposed 100-place child care centre (CCC) of about 1,018 sqm will be a self-financing facility. Please clarify how the provision of the subject CCC will be ensured at the implementation stage.	Further consideration for the operation and implementation of the proposed 100-place CCC may be included in the lease conditions, subject to the further discussion and liaison with relevant departments in the later stage.
	ii. In the event that the subject CCC cannot be materialised, please advise whether the reserved non-domestic GFA of about 1,018 sqm will be utilised for retail provision or any other uses.	Further consideration for the operation and implementation of the proposed 100-place CCC may be included in the lease conditions, subject to the further discussion and liaison with relevant departments in the later stage.
8.	Paras 5.2.1 and 5.2.10: The proposed further setback of 6m is not reflected in your proposed amendments to the Notes or Explanatory Statement of the OZP. Please clarify how the	Please refer to the updated **Indicative Architectural Drawings** in **Appendix 1**. There is no amendment to the existing NBA under the

No.	Comments Received	Our Responses
	developer/proposed development can ensure that this design merit will be materialised.	rezoning proposal. The existing 15m-width NBA stipulated in the Explanatory Statement of the OZP shall be strictly followed.
9.	Para. 7.1.3: Please clarify the first sentence, 'about 62% of the total vacancy in 2025 private commercial premises in 2025 was about 12.5%'.	**Section 7.1.3 of Planning Assessment Report** has been revised accordingly.
10	Para. 7.1.4: It is mentioned that a high occupancy rate of retail premises, about 97%, was recorded in years 2023 to 2026 in other neighbourhood shopping centres managed by the Hong Kong Housing Authority and Link REIT. Please elaborate on the reasons for the opposite trend, i.e. the declining occupancy rate, at the subject application site.	It showcases that the Application Site (*We Go Mall*) was experiencing a relatively low occupancy rate recently compare to other neighbourhood shopping centres provided by the HKHA and Link REIT.
Indicative Architectural Drawing		/
11	Basement 1 Floor Plan: The layby of taxi/private car for the CCC is not indicated. Please review.	**Indicative Architectural Drawings (Appendix 1)** have been updated. The taxi / private car lay-by and coach lay-bys for the Child Care Centre have been included.
Appendix 7 - Visual Impact Assessment (VIA)		/
12	Figures 5a to 5f:	/
	i. It is noted that the BHs shown for the existing developments in the figures correspond to the maximum BH restrictions stipulated under the OZP. Please update the figures to reflect the actual BHs of the developments concerned for a more realistic comparison.	**Figures 5a-f** of **VIA** regarding the photomontages have been revised accordingly.
	ii. It is advised to avoid showing blank façade treatment of the proposed development in the VIA report. Please review.	Please note this VIA has been provided in accordance with TPB PG-No. 41A.
Appendix 8 - Retail Floorspace Assessment		/
13	Section 4 Prevailing Retail Landscape: It is noted that information is provided in respect of fitness centres and indoor sports facilities. However, the discussion of social welfare facilities and educational facilities currently in We Go Mall is	Please note a 100-place CCC has been included in the Proposed Development.

No.	Comments Received	Our Responses
	missing. The loss of these facilities due to redevelopment is also one of the major concerns from the public. Please beef up.	Regarding the tutorial school, it is commonly found in commercial buildings, the commercial portion of composite commercial/residential buildings and the ground and upper floors of residential buildings as suggested in TPB PG-No. 40. Considering demand of such tutorial school is relatively subjective, thus, we are not considered to include the discussion of loss of tutorial schools at the moment. Subject to the future business consideration of the project proponent(s), provision of tutorial school may be included within the commercial portion of the Proposed Development.
14	Para. 4.4.10: Please indicate the exact locations of the fitness centres in Ma On Shan area.	**Section 4.4.10 of Retail Floorspace Assessment Report (Appendix 8)** has been supplemented accordingly.
15	Paras 5.4.3 and 5.4.4: It is mentioned that a high occupancy rate of retail premises, an average rate of about 90%, was recorded in other neighbourhood shopping centres within the Planning Area 77. Please elaborate on the reasons for the opposite trend, i.e. the declining occupancy rate, at the subject application site within the same area.	It showcases that the Application Site (*We Go Mall*) was experiencing a relatively low occupancy rate recently compare to other neighbourhood shopping centres provided by the HKHA and Link REIT.
16	Para. 5.4.5: It appears that the conclusion does not fully address why the territorial declining demand for retail floorspace is observed only at the subject application site, while other neighbourhood shopping centres within the same planning area continue to record high occupancy rates in recent years. Please clarify the discrepancy.	Under para. 1.3 of Chapter 6 of the Hong Kong Planning Standards and Guidelines that, "*it must however be stressed that retail development is primarily market-driven and that planning intervention from the Government should be kept to the minimum. Flexibility should be exercised in the application of the broad approach to enable retail provision to adapt to possible changes in demographic characteristics, people's aspirations, incomes and lifestyles and also to respond to changes in the geographical distribution of population and economic activities.*" It is stated clearly that the demand for retail spaces would be critically affected by various factors. Location is always a critical factor to the operation of retail space. Kam Chun Court Commercial and Recreational Block, Kam Tai Shopping Mall and Yan On Shopping Centre that with higher

No.	Comments Received	Our Responses
		occupancy rates are either situated in "R(A)" zones, near to public housing estates or in closer proximity to MTR stations. There are large population demand and better transport connectivity to support these neighbourhood shopping centers. However, We Go Mall is surrounded with developments of a lower residential density zoning of "R(B)", and with a relatively longer walking distance to the nearest MTR station than the other neighbourhood shopping centers. The retail floor space demand for We Go Mall is thus comparatively lower than others in terms of demographic characteristics and connectivity.
H. Public comments conveyed by Sha Tin District Office (STDO)		
Date: 22 September 2026		
Please find below the summary of public comments conveyed by STDO for your information/response.		/
1.	**Land Use Planning and Policy Justifications**	/
	a) The redevelopment violates the initial 'promise' of setting up a local shopping mall (agreed upon the decision of the Town Planning Board and land sale) and contradicts the planning framework of Ma On Shan area.	The indicative scheme is modified such that the proposed commercial floorspaces provision would be now be 9,121.28 sq.m., and if including the floor area for the CCC, would be 10,129.1 sq.m.. These are all above the minimum GFA for shop, services, place of entertainment and eating place purpose of the subject Lease (STTL No. 482) (i.e. not less than 8,000 sq.m.). The redevelopment, with the provision of 10,129.1 sq.m. of non-domestic floor space, would not affect the positioning of a neighbourhood shopping center in the vicinity. The proposed redevelopment is still in line with planning framework of Ma On Shan area.

No.	Comments Received	Our Responses
	b) Redevelopment based on high vacancy rates and retail restructuring are not valid planning considerations, which may set an undesirable precedent. The high vacancy rate of the existing shopping centre (We Go Mall) is suspected to be 'artificial', as the developer deliberately avoided introducing popular shops, services, and eating places.	To unleash the development potential of the Site, redevelopment into a commercial-cum-residential development is proposed within the captioned Application. Considerations including "single site, multiple use" model to in line with the Chief's Executive's Policy Address, have been taken into account of the Proposed Development. Provision of shop types are subject to the future business consideration of the project proponent(s). A range of activities and/or promotions had been adopted in the We Go Mall, including upgrading to pet-friendly model, provision of premier indoor pickleball club together with gear rental, provision of Beyblade X-related facilities, etc.. However, the occupancy rate for the existing We Go Mall is dropping steadily over the years.
	c) With the Government's policy of not rolling out commercial sites for sale in the coming year (as announced in the 2025-26 Budget), it is undesirable from a planning perspective to further reduce commercial floorspace by agreeing this application.	The indicative scheme is modified such that the proposed commercial floorspaces provision would be now be 9,121.28 sq.m., and if include the floor area for the CCC, would be 10,129.1 sq.m.. These are all above the minimum GFA for shop, services, place of entertainment and eating place purpose of the subject Lease (STTL No. 482) (i.e. not less than 8,000 sq.m.). The planning context of the site has been changed significantly over the years, so as the shopping mode of Hong Kong territory. It has been demonstrated that there is currently no strong demand for retail space in this developed neighbourhood. Given there is still development potential of the subject site, the rezoning application is considered desirable from a forward planning perspective.

No.	Comments Received	Our Responses
	d) An overall review of the Ma On Shan land use planning should be conducted, taking into account other planned developments such as the proposed Ma Liu Shui reclamation project.	A comprehensive planning review has been conducted in our **Planning Assessment Report**, based on the best available information in public domain. However, details of the proposed Ma Liu Shui reclamation projects are not available in any public domain.
2.	**Impact on Residents' Livelihood and Community Facilities**	/
	a) We Go Mall is the only large-scale commercial complex in the vicinity offering a comprehensive range of daily necessities to a relatively remote neighborhood that lacks close MTR access and has limited public transport.	The indicative scheme is modified such that the proposed commercial floorspaces provision would be now be 9,121.28 sq.m., and if include the floor area for the CCC, would be 10,129.1 sq.m.. These are all above the minimum GFA for shop, services, place of entertainment and eating place purpose of the subject Lease (STTL No. 482) (i.e. not less than 8,000 sq.m.). The Proposed Development is still positioned as neighbourhood shopping centre that would also offer a comprehensive range of daily necessities to a relatively remote neighborhood. Further provision of shop types are subject to the future business consideration of the project proponent(s).
	b) A prolonged closure during the 9-year construction period will severely disrupt residents' daily lives; some have requested interim arrangements for shops and services and the social welfare facilities, which are provided in We Go Mall, during the construction period.	Well noted for the concern. Our implementation programme would be carried out as expeditiously as possible so as to minimise the duration of impacts on nearby residents.
	c) The redevelopment will lead to the loss of existing social welfare facilities and children's learning centres, bringing inconvenience to those in need.	Please note a 100-place CCC has been included in the Proposed Development. Regarding the tutorial school, it is commonly found in commercial buildings, the commercial portion of composite

No.	Comments Received	Our Responses
		commercial/residential buildings and the ground and upper floors of residential buildings as suggested in TPB PG-No. 40. Demand of such tutorial school is relatively subjective. Subject to the future business consideration of the project proponent(s), provision of tutorial school may be included within the commercial portion of the Proposed Development.
	d) The non-domestic floorspace of the Site will be significantly reduced to 7,991 m2 under the redevelopment, and there is no guarantee that the new development will provide shops and services similar to those currently available.	The indicative scheme is modified such that the proposed commercial floorspaces provision would be now be 9,121.28 sq.m., and if include the floor area for the CCC, would be 10,129.1 sq.m.. These are all above the minimum GFA for shop, services, place of entertainment and eating place purpose of the subject Lease (STTL No. 482) (i.e. not less than 8,000 sq.m.). Further consideration for the operation and implementation of the proposed retail floorspaces may be included in the lease conditions, subject to the further discussion and liaison with relevant departments in the later stage.
3.	**Environmental, Air Ventilation, and Visual Impacts**	/
	a) Demolishing the existing 5-storey building to construct a 26-storey residential block will increase the building height from approximately 30 meters to 100 meters, representing a more than threefold increase in vertical scale. This massive structure will sever established breezeways and prevent the free flow of air, adversely affecting the surrounding microclimate. Air ventilation has already been compromised by Yan On Estate Phase 2, and the redevelopment will further deteriorate the situation by creating a 'wall effect'.	Several design merits have been proposed, including provision of building setbacks, tally with the stepped building height profile concept in Ma On Shan district, etc., in order to respect the existing NBA and is expected to enhance the south-east and north-west air paths of the area to improve air penetration and visual permeability of the area. Further design consideration including extensive greening will be taken into account in the later detail design stage. Under the current scheme, there will be two blocks of residential towers with a building separation in the middle as a visual and air corridor. There should be no 'wall effect' as described.
	b) The proposed development will affect visual permeability.	Please note a **Visual Impact Assessment (VIA) (Appendix 7)** has been conducted and demonstrated that overall visual impact of the

No.	Comments Received	Our Responses
		Proposed Development would be negligible to moderate. Meanwhile, design features have been adopted to minimise the visual impact brought by the Proposed Development.
	c) The proposed 26-storey high-rise building will be in close proximity to adjacent residential buildings, infringing upon the privacy of nearby residents.	Please refer to the planning and design merits as stated in **Planning Assessment Report**.
4.	**Traffic, Infrastructure, and Drainage**	/
	a) The addition of 539 residential units will impose a heavy burden on the capacity of existing roads and public transport. Traffic flow on Po Tai Street will increase significantly due to new residents, visitors, service vehicles, and delivery operators.	Please note a **Traffic Impact Assessment (TIA) (Appendix 3)** has been conducted and demonstrated that no adverse traffic and pedestrian impact to the surrounding road network is anticipated. The TIA also included a 2038 junction and link capacity analysis, which results showing the sufficient capacity to accommodate the expected 2038 traffic flows and the additional traffic generated by the Proposed Development.
	b) The current road design of Po Tai Street is not suitable for residential development at the Site. A more comprehensive traffic impact assessment should be conducted to demonstrate that the road network and public transport can support the added population.	Please note a **TIA** has been conducted and demonstrated that no adverse traffic and pedestrian impact to the surrounding road network is anticipated.
	c) The current drainage impact assessment fails to consider extreme climate conditions.	Please note a **Drainage Impact Assessment (DIA) (Appendix 6)** has been conducted and demonstrated that no adverse drainage impact arising from the Proposed Development is anticipated.
5.	**Construction Nuisance and Environmental Sustainability**	/
	a) Demolishing a major commercial development after only eight years of operation contradicts the principles of sustainable construction due to its short lifespan and the substantial construction waste generated.	Please note an **Environmental Assessment (EA) (Appendix 4)** has been conducted and demonstrated that construction wastes including the construction and demolition (C&D) materials would be re-used on-site as far as practicable or deliver to the public fill reception facilities to possibly re-use in other projects. A waste management plan would be carried out for the overall framework for waste management and reduction during construction stage.

No.	Comments Received	Our Responses
		To maximum the use of the existing structure and to minimise construction waste, the indicative scheme intends to preserve part of the existing basement carpark so as to minimize possible structural alternation. Keeping the two various existing run-in/out, while the existing carparking area can be largely reserved for future commercial car parking area, the existing underground ramp has to be modified for future circulation. Based on the preliminary design, by retaining about 3,800 sq.m. of the existing We Go Mall basement floor, the total C&D material shall be greatly reduced from 63,000 m3 to 43,500 m3, indicating a reduction of about -30% in C&D waste, which is mainly achieved by reducing the C&D waste from basement excavation works. The feasibility of retaining the existing We Go Mall structure was studied.
	b) The lengthy construction period will bring substantial nuisance to the neighborhood, including dust and noise pollution.	Please note an **EA** has been conducted and its results showed that with the implementation of the proposed mitigation measures, no insurmountable construction dust and noise impact is anticipated.
6.	**Open Space Compensation**	/
	a) The encroachments of "Open Space" and 'Road' area as well as the open space at the roof of the existing mall affected by the subject application, were not satisfactorily compensated in the current proposal.	Please note the Application Site area follows entirely the lot boundary of STTL No. 482 which was tendered by Government in 2013. Minor portions of the Application Site falls onto "Open Space" ("O") zone (0.22% of total application site area) and area shown as 'Road' (1.42% of total application site area). The minor encroachment onto the "O" zone and area shown as 'Road' can be regarded as minor boundary adjustment as provided for in the covering Notes of the Approved Ma On Shan Outline Zoning Plan No. S/MOS/28. In this regard, it is considered that the Application Site falls within an area zoned "Commercial" zone only, and the minor encroachment are not included in this Planning Assessment Report.
I.	***Comments from Commissioner for Transport***	

No.	Comments Received	Our Responses
	(Subject Officer: Mr. Steve HO; Tel: 2399 2408)	
Date: 22 September 2026		
1.	Comments on the revised Traffic Impact Assessment (dated 27.8.2026):	/
	a) Please provide raw data to demonstrate the existing surplus PT capacity could cater the anticipated PT demand.	The raw data of public transport surveys is attached for your reference.
	b) Please rephrase para. 2.22 and para. 4.27 that the surplus not only include franchised bus services.	**Section 2.22** of **TIA** has been revised as follows: *"Table 2.7 shows that the existing franchised bus / GMB services have surplus capacity of over 2,000 and 1,600 passengers during the AM and PM peak hours respectively."* **Section 4.27** of **TIA** has also been revised as follows: *"Table 4.13 shows that the maximum road-based passenger demand is found to be 316 ped/hr. As mentioned in Paragraph 2.22, the existing franchised bus / GMB services have surplus capacity of over 2,000 and 1,600 passengers during the AM and PM peak hours respectively. Hence, the surplus capacity would be **capable to absorb the additional road-based passenger demand** associated to the Proposed Development."*
	c) Noting the planned private residential development in Sha Tin Area 73 ('Area 73 Development') is anticipated to be completed before the design year of the proposed development, the Area 73 Development should be included in the planned/committed developments for the assessment of cumulative traffic impact of your proposed development. For the development parameters of Area 73 Development which is not available at this juncture, please consider making the assumptions with reference to the completed private residential developments along Ning Tai Road, Ma On	It is noted that the Government intends to grant property development right for a piece of land within Sha Tin Area 73 (the "**Development in Area 73**") as part of the MTR Pak Shek Kok Station Development Project. According to「大埔區議會文件 SHD 33/2026 號（2026 年 7 月 10 日社會福利、房屋及發展規劃委員會會議）」: 目前，位於鄰近地區馬鞍山城門河畔、距離港鐵大水坑站只有約 800 米的用地 2，主要用作政府工地以支援城門河對岸的沙田污水處理廠搬遷工程。在污水廠搬遷工程 2029 年完成後，這幅可發展面積約 3 公頃的用地會被納入這個發展項目，作私人房屋發展。

No.	Comments Received	Our Responses
	Shan (i.e. those surrounding the application site) in your assessment.	政府與港鐵公司會研究落實適當的交通改善措施，以確保項目不會對區內道路網絡造成負面影響。 The Development in Area 73 has a site area of around 30,000m², which is more than 6 times larger than our Proposed Development. Given the scale and location of the Development in Area 73, it is anticipated that additional transport facilities and services, such as public transport terminus and new bus routes, will be provided to accommodate the substantial increase in population. In addition, the HKPSG also recommends a walking catchment of 500m for railway stations. In view that the Development in Area 73 is located around 800m from MTR Tai Shui Hang Station, its travel characteristics are likely to differ from those of the developments in Area 77. Given that the development parameters of the Development in Area 73 are yet to be available and the Project Proponent will formulate appropriate traffic mitigation measures to address its traffic and transport impacts, it is considered premature to include the Development in Area 73 in the revised TIA report for the Proposed Development.
J. Comments from Traffic Engineering (NTE) Division of TD (Subject Officer: Mr. Steve HO; Tel: 2399 2408)		
Date: 30 September 2026		
I.	**TIA Report**	/
General comments		/
1.	You should follow the "Traffic Impact Assessment (TIA) Checklist for Development Project (February 2026 Edition)" ("**the Checklist**") published by this department to conduct the	Noted.

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	TIA. (https://www.td.gov.hk/filemanager/tc/publication/tia%20checklist%20for%20devel opment%20projects_202602.pdf)	
Specific comments		/
2.	Table 2.2 – It appears to me that it is not appropriate to obtain the road capacity by using the "observed" pcu factor which fluctuates daily while the design capacity of a road should not. In your assessment, the road capacity is directly proportional to the pcu factor, which is counterintuitive as the higher the pcu factor, the greater proportion of heavy vehicles, which should result in a lower road capacity. Please review your assessment.	The pcu factor of 1.2 has been adopted to convert the capacity from veh/hr to pcu/hr. Please refer to the updated link capacity assessment is found in **Table 2.2** of **TIA**.
3.	Table 2.5 and F3 – There are 3 travel directions along F3. This should not be treated as a single footway link for the pedestrian assessment. Please review.	The eastern footpath of Po Tai Street (F3) has been sub-divided into 3 sections, namely F3a, F3b and F3c. Please refer to the revised **Section 2.14, Tables 2.5** and **4.11** of the **TIA**.
4.	R-to-C item 6 and Figure 3.2 –	/
	a) I cannot see any provision of lifting platforms in Figure 3.2 for the loading and unloading (L/UL) areas of the goods vehicle L/UL spaces. Yet, I still doubt whether the requirements set out in PNAP APP-111 regarding the loading and unloading of goods vehicles are complied with. BD comments should be sought as well in this regard.	Service lift will be provided within the goods vehicle loading / unloading area to facilitate goods delivery activities. Hence, lifting platforms are no longer required for goods delivery. Please refer to the updated **Figure 3.2** of **TIA**.
	b) It seems not appropriate that the laybys for coaches, which should be the proposed provision for CCC, are in the form of parking space. Please review. Yet, I doubt the proposed location of the layby is proper for the picking up and setting down of children, since the anticipated routing of the children may have conflict with the anticipated route of goods delivery. Please critically review.	The taxi / private car lay-by and coach lay-bys for the Child Care Centre have been relocated away from the goods vehicle loading / unloading area. Hence, there is no conflict between passengers and goods delivery activities. Please refer to the updated **Figure 3.2** of **TIA**.

No.	Comments Received	Our Responses
5.	It seems not appropriate that the laybys for coaches, which should be the proposed provision for CCC, are in the form of parking space. Please review. Yet, I doubt the proposed location of the layby is proper for the picking up and setting down of children, since the anticipated routing of the children may have conflict with the anticipated route of goods delivery. Please critically review.	To restrict unauthorised entry and illegal parking on the access road leading to the run-in of the subject site, temporary traffic arrangement (TTA) will be submitted to close the access road during the construction stage, except for access of construction vehicles.
6.	Performance of Junction J4 –	/
	a) According to our internal record, the longest observed queue length may be up to 80 m at the offside lane of Po Tai Street. Please conduct queue length analysis for the junction and review if any improvement works could be proposed.	The queue length analysis for J4 has been supplemented in **Appendix A** of **TIA**. Given that Po Tai Street between J3 and J4 is around 300m long and vehicle queues at Po Tai Street do not block the upstream junction, the analysis results confirmed that J4 has no operation issue in general from a traffic engineering point of view.
	b) I doubt the proportion of left-turn to right-turn traffic at Po Tai Street is in the ratio of 1:2, since it is not consistent with our internal record which shows the ratio of 1:3. Please justify.	According to the traffic survey, the number of left-turn vehicles compared to right-turn vehicles is in the ratio of around 1:3. However, a significant proportion of left-turn traffic from Po Tai Street to Ning Tai Road was found to be franchised buses and public light buses, which have higher pcu factors. As a result, the ratio of left-turn to right-turn traffic, in terms of pcu, is approximately 1:2.
	c) RC of AM Peak (with development case) should be 87% as per the calculation sheet. The figure in Table 4.7 is inconsistent with it. Please review.	**Table 4.7** of the **TIA** has been updated regarding the reserve capacities for J4.
7.	Please review the junction calculation, in particular for J3 and J4:	/
	a) the geometric input of the junction layout;	The geometric parameters for J3 and J4 have been reviewed and updated in **Appendix A** of **TIA**.
	b) the degree of saturation should be provided.	The degree of saturation for J3 and J4 has been supplemented in **Appendix A** of **TIA**.

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8.	Table 4.8 – The capacity of the road link and the corresponding road type should also be included in the table. Please revise.	Please refer to the updated **Table 4.8** of **TIA** regarding its road types and capacities.
9.	With reference to the ground floor plan in the planning submission (not TIA), it seems that all residents of the proposed development would first exit the site at the footpath of Po Tai Street (footway F3). It seems this pedestrian connectivity arrangement would unnecessarily load the pedestrian onto a relatively narrow footway, of which the effective width is 1m only. Noting currently WeGoMall is also set back with canopies for the bus stop at Po Tai Street:	/
	a) the requirements in Chapter 8 of HKPSG and TPDM regarding walkability, particularly the minimum Through Zone clear width of footpath (i.e. 3 m) should be provided.	Our Applicant is willing to provide a 1.2m setback along the site frontage adjacent to the existing bus / GMB lay-by at Po Tai Street to provide a widened footpath with clear width of 3.0m. Please refer to **Sections 3.9 – 3.10** and **Figure 3.1** of **TIA** regarding the proposed setback.
	b) Please also review the pedestrian connectivity of the proposed development with a view to improving the walkability of the site.	With the proposed setback at Po Tai Street and the 3m footway within the non-building area, pedestrian connectivity between Sai Sha Road, Po Tai Street and the Proposed Development is improved.
10.	Please conduct the preliminary assessment for the traffic impact during construction stage according to the Checklist.	According to the "*Checklist of Traffic Impact Assessment (TIA) for Development Projects*", "*Construction Traffic Impact Assessment (CTIA), which involves the traffic impact assessment during the construction stage of a development project, could be separated from a TIA in the planning application. The application will be approved with conditions which requires the CTIA submission at a later stage, e.g. during construction stage, for approval*". Relevant statements have been supplemented in **Sections 3.11 – 3.12** of **TIA**. Hence, the conduct of CTIA will be carried out at a later stage.
11.	Comments on carpark layout:	/
	a) It appears to me that the design of the loading/unloading (L/UL) bays cannot generally follow	The internal transport layout has been updated. Please refer to **Figures 3.1 – 3.4** of **TIA**.

No.	Comments Received	Our Responses
	the guidelines / requirements as set out in PNAP APP-111, including but not limited to the following:	
	i. Insufficient space (i.e. less than approx. one HGV length) is reserved in front of the HGV L/UL bay for reverse manoeuvring.	Two-way aisle for parking of HGV is around 10.7m, which is more than the minimum requirement of 10m as mentioned in PNAP APP-111. Please refer to the updated **Figure 3.2** of **TIA**.
	ii. The goods delivery routes (from L/UL bay to the services lifts of shopping arcade) conflict with the pedestrian traffic (especially children) and vehicular traffic.	The taxi / private car lay-by and coach lay-bys for the Child Care Centre have been relocated away from the goods vehicle loading / unloading area. Hence, there will be no conflict between passengers and goods delivery activities. Please refer to the updated **Figure 3.2** of **TIA**.
	iii. Sub-standard hammerhead design is proposed, leading to multiple manoeuvres of HGV with minimal clearance to other structural components or parked vehicles for entering the desired L/UL bays.	The hammerhead within the goods vehicle loading / unloading area is re-designed to enhance manoeuvrability to / from the HGV loading / unloading bays. Please refer to the updated **Figure 3.2** of **TIA**.
	b) For the design of ramp:	The design of helical ramp has been updated. Please refer to **Figures 3.1 – 3.4** of **TIA**.
	i. the requirements set out in PNAP APP-111 and TPDM Volume 7 Table 7.4.3.1 and Table 7.4.3.2 should be observed. In general, according to PNAP APP 111, the use of two-way ramps in a multi-storey car park is not recommended;	As recommended in TPDM Volume 7, "*if 2-way ramps are needed, it is recommended that opposing traffic be physically separated by a kerb*". As shown in **Figures 3.1 – 3.4** of **TIA**, central kerb will be provided along the helical ramp such that opposing traffic is physically separated.
	ii. If necessary, the up-ramps should be located on the outer curve to achieve a gentler gradient for two-way helical ramps;	The helical ramp has been rearranged such that vehicles travel along the left. Please refer to **Figures 3.1 – 3.4** of **TIA**.
	iii. It appears that no horizontal clearance from structures is provided for the proposed ramps;	The minimum horizontal clearance of 600mm is adopted to design the internal transport layout.
	iv. It appears that the minimum curve radius (i.e. outside radius of the inner ramp) is less than 9.0m;	The minimum outer radius of helical ramp, i.e. 9m, is adopted to design the internal transport layout.
	v. It is observed on the Figure 3.3 that there is a door opening in the middle of the helical ramp at first and	No door opening will be provided within the helical ramp.

No.	Comments Received	Our Responses
	second floor. This poses a significant road safety risk for the users exiting from the door;	
	vi. It is anticipated that there would be (i) pedestrian-vehicle conflicts as the residential lift lobby is located right at the upper end of the ramp at 3rd floor; and (ii) vehicular conflicts where motorcycle parking spaces are located very close to the upper end of the ramp at 3rd floor.	The residents' lift lobby and motorcycle parking spaces on 3/F have been relocated away from the helical ramp as shown in updated **Figure 3.4** of **TIA**.
II.	Planning Statement	/
1.	Para. 6.1.2 – The phrase in the first sentence "…adjacent to the proposed parking space for private cars under…" should be revised as "…adjacent to the proposed fee-paying public car park under…".	**Section 6.1.2** of **Planning Assessment Report** has been revised accordingly.
The following departments have no objection to/comment on the application:		/
- Hong Kong Police Force - Fire Service Department		Noted.