

Our Ref: [REDACTED]
Your Ref: TPB/A/H10/98
Date: 2 July 2026

By Email and by Hand

The Secretary
Town Planning Board
15/F, North Point Government Offices
333 Java Road
Hong Kong.

Dear Sir/Madam,

Planning Application under Section 16 of the Town Planning Ordinance for Proposed Residential Institution (Student Hostel) at Middleton Towers, 140 Pokfulam Road (RBL No. 825 RP) (Application No. A/H10/98)
Submission of Responses to Comments (1st Batch)

Reference is made to the captioned Section 16 Planning Application received by Town Planning Board (TPB) on 11 May 2026.

On behalf of the Applicant, the University of Hong Kong, we hereby submit a table of responses to departmental comments (RtoC table) at **Annex A** in response to departmental comments from Buildings Department and Planning Department, received via email dated 2 June 2026.

This submission does not result in a material change of the nature of the captioned planning application. We sincerely hope that with the above information, the outstanding issues can be resolved satisfactorily with the concerned departments. Should you have any queries or require further information, please do not hesitate to contact our Ms. Winnie HUNG at [REDACTED] (or email [REDACTED]) or Ms. Pearl HUI at [REDACTED] (or email [REDACTED]).

Yours faithfully,
For and on behalf of
AECOM Asia Company Limited



Pearl HUI
Executive Director, Urban Planning

Encl.

cc: The University of Hong Kong w/e

Annex A Response to Departmental Comments

**S.16 Planning Application for Proposed Residential Institution (Student Hostel) in “Residential (Group C)”
with a minor portion within “Green Belt” Zones at Middleton Towers, 140 Pok Fu Lam Road (Rural Building Lot No. 825 RP)
and adjoining Government Land, Pok Fu Lam, Hong Kong**

Responses to Departmental Comments

Item	Bureau/Department	Date
1.	Buildings Department	2 June 2026
2.	Planning Department	2 June 2026

Response to Departmental Comments – Application No. A/H10/98

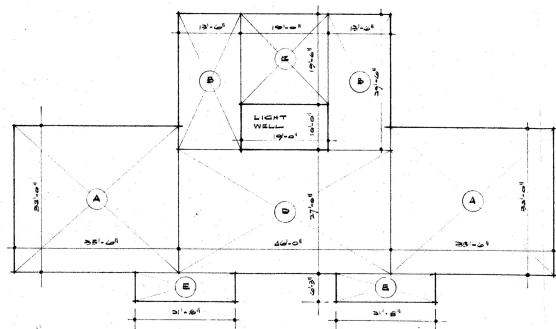
Item	Comments Received	Responses
1.	Chief Building Surveyor/Hong Kong West, Buildings Department (Received via email from PlanD dated 2.6.2026) (Contact Officer: Ms. Lam Pik-ki, tel: 2626 1380)	
1.1.	I have no objection in principle under the Buildings Ordinance to the s.16 application. Please note that the proposal involves slabbing-over of light wells; thus, additional plot ratio and site coverage will be resulted. Detailed comments will be made at building plan submission stage.	Noted.
2.	District Planning Officer/Hong Kong, Planning Department (Received via email dated 2.6.2026) (Contact Officer: Mr. Ronald CHAN, tel: 2231 4913)	
2.1.	The applicant should advise the average unit size of the proposed residential institution (student hostel) use.	The average unit size is about 8m², excluding shared bathroom. We would like to further supplement that the proposed Middleton student hostel is intended to be operated in line with other HKU's hostels. The hostel will be affiliated with HKU and all wardens/tutors will be recruited and appointed by the Centre of Development and Resources for Students (CEDARS) of the HKU. The proposed student hostel is designed and will be operated with student wellbeing, safety and inclusivity as priority. While we acknowledge expectations regarding privacy and management standards, the scheme incorporates modern design, robust operational controls, and a university-led governance model to address these concerns comprehensively. Some key measures include:

Item	Comments Received	Responses
		1. Each bathroom is shared by only two rooms, representing a low sharing ratio and offering a high degree of privacy. The facilities will be designed as fully enclosed, lockable units to ensure user comfort and privacy. Room allocation will be carefully managed to ensure compatible sharing arrangements, including gender sensitive assignment. The proposed arrangement is in line with the design of lately completed University hostels, including the High West development. 2. The proposed hostel will include several safeguards: • University-operated model – unlike purely commercial operators, university management align operational priorities with student welfare, pastoral care, and academic supports. • On-site management – presence of wardens, resident tutors, and trained staff recruited by the University to provide supervision, conflict resolution, and community building • Design for safety – the development will be designed with good visibility and lighting, clearly defined circulation and controlled access points. 3. HKU will monitor the future operation and management of the hostel, which would base on a University-led operation with the primary objective to support student life, affordability, and campus integration, not maximizing rental yield. The development aims to enhance the university

Item	Comments Received	Responses				
		competitiveness in attracting local and overseas students to support student retention and wellbeing. It is a critical educational infrastructure to support the long-term sustainability of the university. We would also like to clarify common areas on ground floor will provide facilities such as vending machines to serve the convenience of future residents only. Also, existing open space and landscaped areas will be maintained as its use with possible upgrades to serve future residents only.				
2.2.	Per CBS/HKW, BD’s comment above, the applicant should provide calculations to demonstrate that additional plot ratio (PR) and site coverage (SC) of the slabbing-over of light wells would not exceed the OZP restrictions for the PR/SC. Otherwise, planning permission for minor relaxation of the plot ratio and /or site coverage would be required under section 16 of the Town Planning Ordinance.	In the record under the approved building plan dated 24 September 1966, with the quoted site area at 8,500 sq.m., the following parameters are stipulated: <table><tr><td>Total GFA</td><td>17,070 (D) + 1,128 (ND) = 18,198 m²</td></tr><tr><td>Total Roof Over Area :</td><td>1,379.4 (D) + 341.88 (ND, outside tower footprint) = 1,721.28 m²</td></tr></table> Remarks: D = Domestic, ND = Non-domestic The applicant intends to adhere to the parameters as per the approved building plan for the renovation proposal. Necessary slabbing over of light wells for domestic uses and further layout adjustments for compliance with relevant statue would be further explored in the detailed design stage. The applicant commits to observe the necessity to offset some areas (e.g. covered carports) in order not to exceed the existing roof over	Total GFA	17,070 (D) + 1,128 (ND) = 18,198 m ²	Total Roof Over Area :	1,379.4 (D) + 341.88 (ND, outside tower footprint) = 1,721.28 m ²
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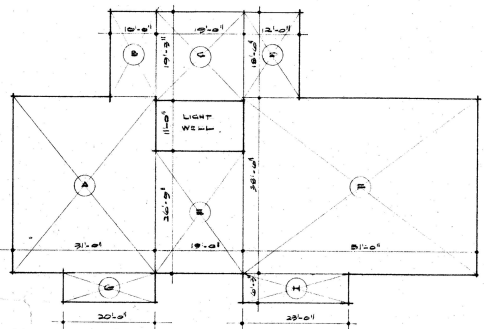
Item	Comments Received	Responses
		area and gross floor area as stipulated in the GBP record above, via building plan to be submitted to the Buildings Department for approval prior to works commencement. For the area calculations stipulated in the approved GBP and layouts of existing 1-storey covered carports, please refer to Annex I and Annex II respectively for information.

Annex I Approved Building Plan



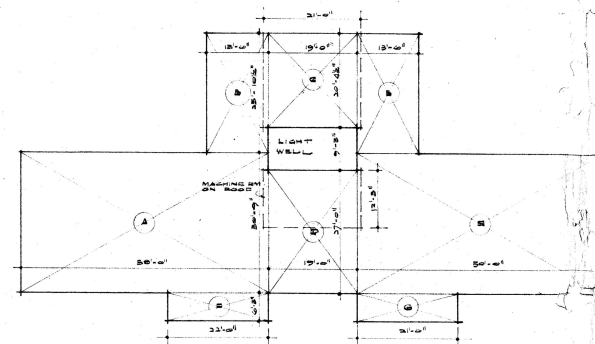
EXISTING BLOCK 'A'

ROOFED OVER AREA OF EXISTING BLOCK 'A'		
2A	3 x 35'-0" x 35'-0"	3,722.00 sq. ft.
2B	3 x 35'-0" x 15'-0"	787.50 "
1A	1 x 15'-0" x 15'-0"	225.00 "
1B	1 x 35'-0" x 15'-0"	525.00 "
2C	2 x 35'-0" x 15'-0"	1,050.00 "
TOTAL		6,310.00 sq. ft.



EXISTING BLOCK 'B'

ROOFED OVER AREA OF EXISTING BLOCK 'B'		
A	31'-0" x 35'-0"	1,085.00 sq. ft.
B	15'-0" x 15'-0"	225.00 "
C	15'-0" x 15'-0"	225.00 "
D	15'-0" x 15'-0"	225.00 "
E	15'-0" x 35'-0"	525.00 "
F	31'-0" x 35'-0"	1,085.00 "
G	35'-0" x 15'-0"	525.00 "
H	35'-0" x 15'-0"	525.00 "
TOTAL		4,700.00 sq. ft.



PROPOSED BLOCK 'C'

ROOFED OVER AREA OF PROPOSED BLOCK 'C'		
1A	35'-0" x 35'-0"	1,225.00 sq. ft.
1B	15'-0" x 35'-0"	525.00 "
1C	15'-0" x 35'-0"	525.00 "
1D	35'-0" x 15'-0"	525.00 "
1E	35'-0" x 15'-0"	525.00 "
1F	35'-0" x 15'-0"	525.00 "
1G	35'-0" x 15'-0"	525.00 "
TOTAL		5,100.00 sq. ft.

SITE COVERAGE & PLOT RATIO

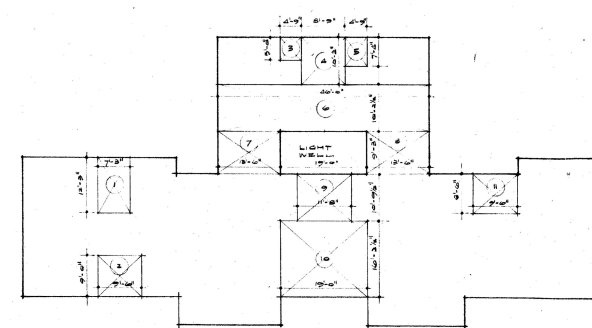
I. GROSS FLOOR AREA:	
A. NON-DOMESTIC: (1,180 + 1,899) + (1,043 + 1,892) + (1,725 + 1,122) = 23 x 10'	12,140 sq. ft.
B. DOMESTIC: (1,752 + 1,477 + 1,189) x 12 = 6,466 sq. ft.	6,466 sq. ft.
C. TOTAL: 18,606 sq. ft.	18,606 sq. ft.
II. SITE COVERAGE:	
A. GROSS SITE COVERAGE: 18,606 / 91,500 = 20.33%	20.33%
B. PERMITTED PERCENTAGE OF NON-DOMESTIC SITE COVERAGE: 12.14%	12.14%
C. PERMITTED PERCENTAGE OF DOMESTIC SITE COVERAGE: 16.32%	16.32%
III. PLOT RATIO:	
A. NON-DOMESTIC PLOT RATIO: 12,140 / 91,500 = 0.133	0.133
B. DOMESTIC PLOT RATIO: 6,466 / 91,500 = 0.071	0.071
C. TOTAL PLOT RATIO: 0.133 + 0.071 = 0.204	0.204

OPEN SPACE CALCULATION

COVERED AREA OF BLOCK 'C'	5,100 sq. ft.
OPEN SPACE REQUIRED: 1/2 x 5,100 = 2,550 sq. ft.	2,550 sq. ft.
OPEN SPACE PROVIDED (AREA COLOURED YELLOW)	8,742 sq. ft.

PERMISSIBLE ROOFED OVER AREA OF MAIN BUILDING IN CONDITIONS OF RE-GRANT

TOTAL ROOFED OVER AREA OF BLOCK 'A' & 'B' INCLUDING AREA OF 1-STORY CAR PORTS	11,010 sq. ft.
AREA OF SITE: 91,500 sq. ft.	91,500 sq. ft.
PERMISSIBLE ROOFED OVER AREA ALLOWED IN CONDITIONS OF RE-GRANT: 17.5% OF SITE AREA	16,012.50 sq. ft.
11,010 sq. ft. < 16,012.50 sq. ft.	

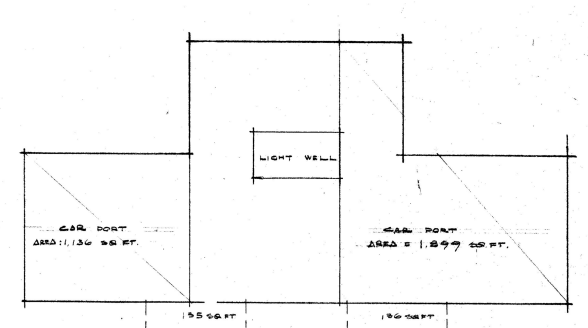


BLOCK 'C'

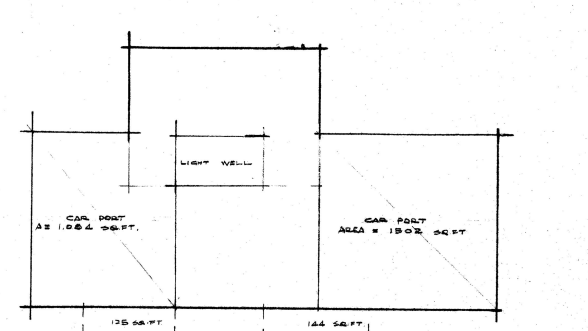
DISCHARGE VALUE OF STAIRCASE

FLOOR AREA	DISCHARGE VALUE
1. 12'-0" x 7'-0"	84.00
2. 9'-0" x 9'-0"	81.00
3. 5'-0" x 4'-0"	20.25
4. 6'-0" x 10'-0"	60.00
5. 7'-0" x 4'-0"	28.00
6. 10'-0" x 10'-0"	100.00
7. 12'-0" x 9'-0"	108.00
8. 12'-0" x 9'-0"	108.00
9. 11'-0" x 10'-0"	121.00
10. 10'-0" x 10'-0"	100.00
11. 9'-0" x 10'-0"	90.00
TOTAL	680.25

I. TOTAL FLOOR AREA	5,100.00 sq. ft.
II. DISCHARGE VALUE	680.25
III. DISCHARGE VALUE PER PERSON	1,199 PERSONS



BLOCK 'A'



BLOCK 'B'

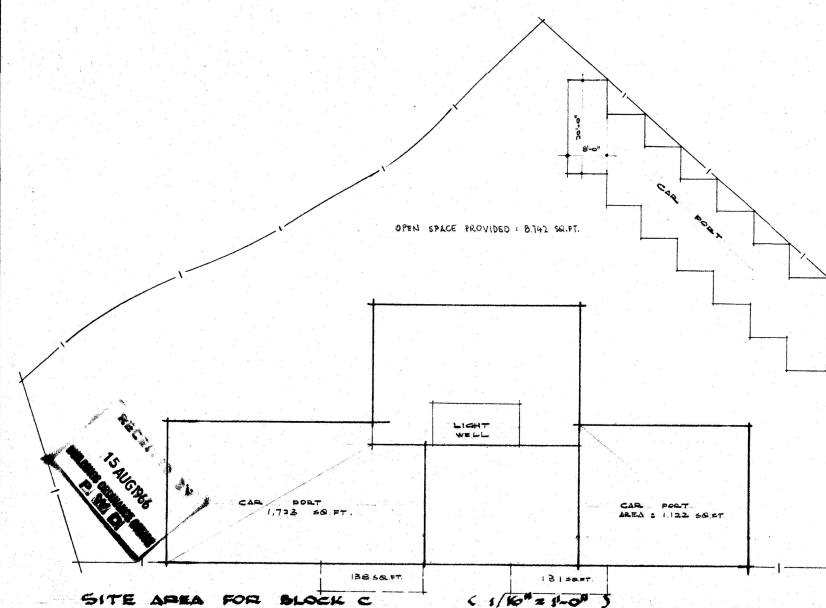
FIRE RESISTANCE REQUIREMENT TABLE

BLOCK	FLOOR	CLASS	USE	FLOOR AREA IN SQ. FT.	CEILING HEIGHT	VOLUME IN CU. FT.	R.F.P. REQUIRED	ELEMENTS OF CONSTRUCTION
A	GROUND	7	PARKING	5,100	12'-0"	61,200	24HOURS	R.C.C. SLAB, R.C.C. BEAM, R.C.C. COLUMN, R.C.C. WALL, R.C.C. FLOOR, R.C.C. ROOF
B	1ST. TO 12TH FL.	3	DOMESTIC	5,100	10'-0"	51,000	1 HOUR	R.C.C. SLAB, R.C.C. BEAM, R.C.C. COLUMN, R.C.C. WALL, R.C.C. FLOOR, R.C.C. ROOF
C	MACHINE RM.	0	MACHINE RM.	682	12'-0"	8,184	24HOURS	R.C.C. SLAB, R.C.C. BEAM, R.C.C. COLUMN, R.C.C. WALL, R.C.C. FLOOR, R.C.C. ROOF

Approved
24 SEP 1986

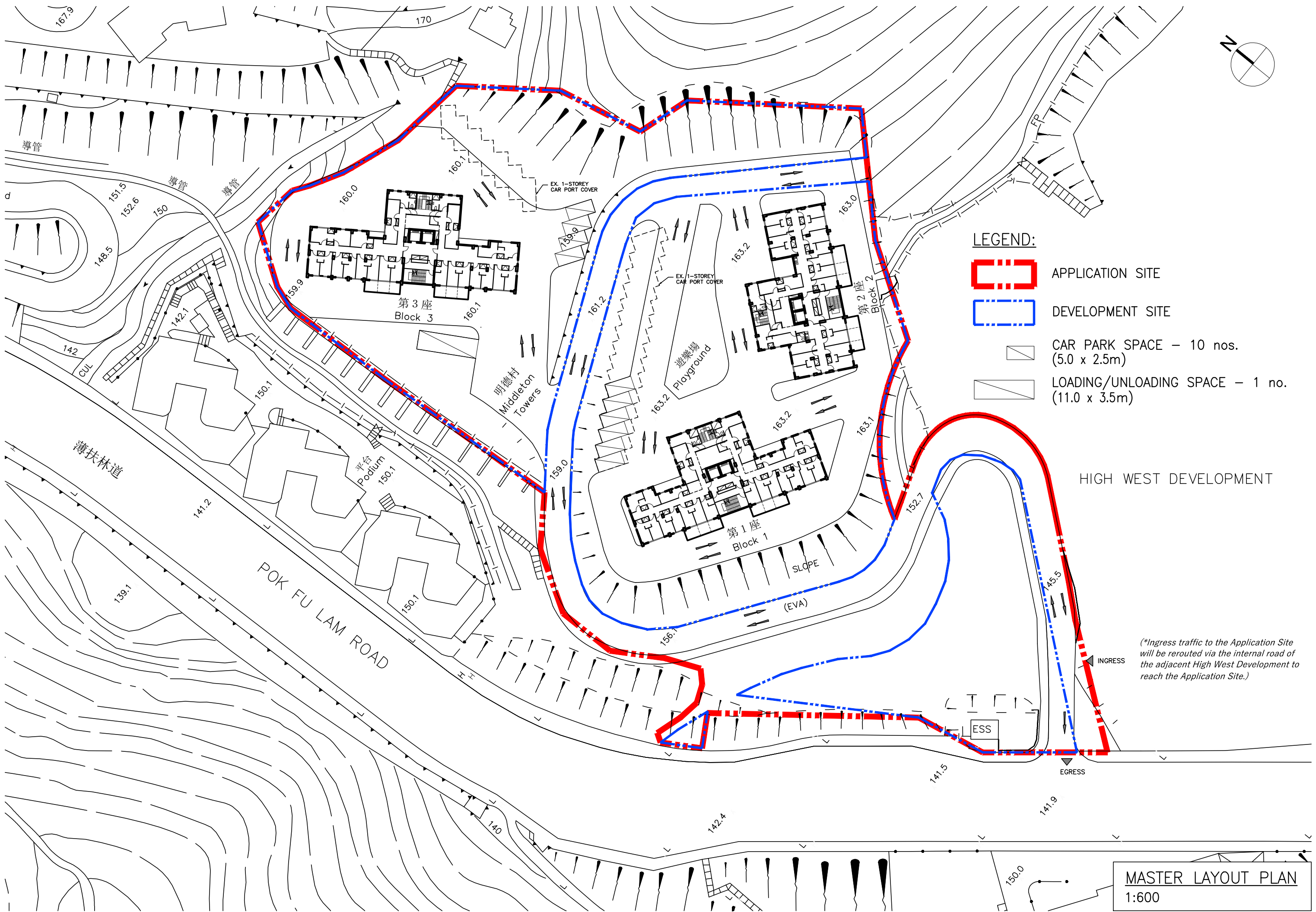
W. SZETO
CONSULTING CIVIL & STRUCTURAL ENGINEERS
15 AUG 1986
DATE

PROPOSED STAFF FLATS ON R.L. 525 FOR THE UNIVERSITY OF HONGKONG BLOCK 'C' CALCULATIONS	100 NO. 336/68/100/100 SCALE: 1/16" = 1'-0" DATE: JULY 1986 DRAWN BY: W. SZETO CHECKED BY: [Signature]
W. SZETO CONSULTING CIVIL & STRUCTURAL ENGINEERS 215-222 EDINBURGH HOUSE • HONG KONG	15 AUG 1986 DATE



SITE AREA FOR BLOCK 'C' (1/16" = 1'-0")

Annex II Master Layout Plan



MASTER LAYOUT PLAN
1:600