

**Similar S.16 Planning Applications for Proposed Residential Development
in “Residential (Group A)” Zone on Ma Tau Kok Outline Zoning Plan**

No.	Application No.	Location (Plan A-1)	Date of Consideration	Approval Condition(s)
1.	A/K10/275	Junction of Sung Wong Toi Road and To Kwa Wan Road, To Kwa Wan, Kowloon	16.7.2024 (MPC)	Nil

就規劃申請/覆核提出意見 Making Comment on Planning Application / Review

參考編號

Reference Number:

260612-185625-82424

提交限期

Deadline for submission:

30/06/2026

提交日期及時間

Date and time of submission:

12/06/2026 18:56:25

有關的規劃申請編號

The application no. to which the comment relates:

A/K10/280

「提意見人」姓名/名稱

Name of person making this comment:

女士 Ms. Hoi

意見詳情

Details of the Comment :

I write to formally object to the above Section 16 Planning Application. My objection is grounded in the following concerns regarding the integrity of the planning process, the appropriateness of the justifications advanced, and the precedent implications of the proposed relaxation.

1. The "Non-Scheme-Based" Nature of the Submission Renders Informed Decision-Making Impossible

The applicant has explicitly stated that the current indicative proposal "does not form part of the application," that the notional design and indicative development parameters are provided "solely for illustration purpose and for conducting necessary technical assessments," and that "the design of the future development will not be bounded by the notional design submitted in the S16 Planning Application."

I respectfully submit that this approach is fundamentally incompatible with sound planning decision-making. The Board is being asked to approve increased development intensity on the basis of technical assessments conducted against a hypothetical scheme to which the applicant has no obligation to adhere. The technical studies submitted in support of this application are therefore assessed against a design that may bear little resemblance to the actual future development.

This creates an untenable situation in which the Board grants expanded development entitlements without any assurance that the impacts of the eventual built form will fall within the parameters assessed. The public and affected residents are similarly deprived of the ability to make meaningful comment, as the scheme against which they are invited to respond may never materialise. In essence, the application seeks approval for an envelope of rights rather than a development proposal, and I submit that this is not the purpose for which the Section 16 mechanism was intended.

I urge the Board to consider whether it is appropriate to approve a relaxation of development restrictions in the absence of any binding commitment, whether by planning condition or otherwise, to ensure that the future development will not exceed the impacts assessed under the indicative scheme.

The applicant justifies the proposed 20mPD height increase primarily on the basis that it would "align the height controls" of the Application Site and CBS-2:KC, "extinguish the physical gap of 20mPD difference created by the project boundaries," and provide "greater design flexibility in building block layout and disposition under the same BHR of the two projects."

I submit that this justification is problematic for the following reasons. The building height restrictions for the Application Site and CBS-2:KC were established through their respective statutory planning processes. If a combined development with a unified height profile was always the intended planning outcome, this should have been reflected in the original planning parameters, or pursued through a Development Scheme Plan amendment subject to full public participation. To use a Section 16 application retrospectively to harmonise heights that were deliberately set at different levels through the statutory process effectively overrides the original planning decisions without subjecting the change to the same level of scrutiny.

I also note that the applicant acknowledges the notional design does not currently include above ground car parks, yet cites the potential future need for such car parks as a further reason for the height increase. This amounts to seeking approval for a height relaxation to accommodate a building element that has not been designed, assessed, or committed to — reinforcing the speculative character of this application.

2. Commercial Marketability is Not a Legitimate Planning Justification

The applicant states that the proposed relaxation "enhances the marketability and attractiveness of the project by offering flexibility in the adjustment of domestic and non-domestic PR at detailed design stage to meet the market situation." I submit that marketability and commercial attractiveness are not planning considerations that the Board should give weight to in determining this application.

The statutory planning system exists to serve the public interest through the orderly use of land, the protection of amenity, and the provision of adequate infrastructure and community facilities. Development parameters such as plot ratios and building height restrictions are set with reference to considerations including visual impact, air ventilation, traffic capacity, infrastructure loading, and urban design — not the financial performance of any individual project.

The applicant's frank acknowledgment that the proposed changes are motivated by a desire to optimise commercial flexibility suggests a conflation of the Urban Renewal Authority's public mandate with its commercial interests as a developer. While I recognise that the URA operates within a self-financing model, this does not entitle it to planning concessions that would not be granted to any other applicant on planning merit alone. The Board should assess this application on its planning merits and disregard considerations of project marketability, which are properly matters for the applicant's own commercial judgment and risk management.

I further note that the applicant's reliance on the Financial Secretary's 2025-26 Budget Speech regarding the suspension of commercial land sales and the potential rezoning of commercial sites to residential use does not, in itself, constitute site-specific planning justification. Government policy statements of general application do not override the need to demonstrate that a proposed change is appropriate for a particular site in its particular context.

For the reasons set out above, I respectfully urge the Board to reject this application. The combination of expanded development entitlements sought without any binding design commitment, the use of adjacent site alignment as a justification for overriding established statutory height con

trols, and the reliance on commercial marketability as a planning ground collectively represent an approach that is inconsistent with the principles of sound and transparent planning.

Should the Board nonetheless be minded to approve the application, I would urge at minimum the imposition of stringent approval conditions to ensure that the future development does not exceed the impacts assessed under the indicative scheme, and that the purported design benefits of the height relaxation are actually delivered in the final built form.

☐Urgent ☐Return receipt ☐Expand Group ☐Restricted ☐Prevent Copy

tpbpd/PLAND

寄件者: [REDACTED]
寄件日期: 2026年06月28日星期日 0:29
收件者: tpbpd/PLAND
主旨: A/K10/280 24 – 354 Ma Tau Wai Road, URA KC 020

類別: Internet Email

A/K10/280 URA KC 020

Nos. 324 – 354 Ma Tau Wai Road and the Adjoining Government Land

Site area: About 1,566sq.m (Includes Government Land of about 213sq.m)

Zoning: "Res (Group A)"

Applied development: 1 Tower – 279 (232) Units / PR 9 (7.5) / 140Mpd (120) / Retail / 61 Vehicle Parking / 80 Public Vehicle Park – 3 floor basement / **NO OPEN SPACE**

Dear TPB Members,

Strong Objections. Another URA development that maxes out on revenue generation while reducing the quality of life in the area.

A long rectangular wall effect podium with 100% site coverage. The alley at the back that provided street level ventilation has been exterminated. Of course, the URA will say that there is a distance between the residential tower and those on the adjoining site, but members have a duty to take into consideration that FOR SURE penny pinching URA will opt for the new government imitative to make our streets ever more wall effect, and once approval is granted will eliminate the basement parking.

ZERO internal open space for residents. So they will have to share any public facilities provided in the complex. Members should take the time to check out the overcrowding at the OS / Children's Playground beside the To Kwa Station. Every time I pass on the bus I see kids queueing up to use the inadequate facilities.

No community services provided.

Then there is the shrinking size of the units, reduced from 51sq.m to 45. The units being demolished are a family sized 670sq.ft. So much for "improving the living conditions of residents in old districts".

That the URA manages to lose money on these redevelopments is a alarming as the current 80 units are to be replaced with 270+.

☐Urgent ☐Return receipt ☐Expand Group ☐Restricted ☐Prevent Copy

The URA has completely abandoned any pretext at adhering to its original mandate. Its focus is now on downsizing in every aspect, size of homes, extermination of at grade parks and sports ground, and any cultural element is fake, like the Shanghai Street project where the heritage buildings have been gouged and even the shell is a mockery.

Mary Mulvihill

就規劃申請/覆核提出意見 Making Comment on Planning Application / Review**參考編號****Reference Number:**

260626-190311-06111

提交限期**Deadline for submission:**

30/06/2026

提交日期及時間**Date and time of submission:**

26/06/2026 19:03:11

有關的規劃申請編號**The application no. to which the comment relates:**

A/K10/280

「提意見人」姓名/名稱**Name of person making this comment:**

先生 Mr. Kenny Au

意見詳情**Details of the Comment :**

2026年啦，單位唔好愈起愈細啦，一係你就個plot ratio 再高啲，一係就起少啲單位，唔好再起啲400呎以下既單位啦，俾返啲尊嚴市民好唔好？

p.s.可唔可以參考下台灣日本咁有個大少少既露台要黎做掠衫曬被啲啲日常野？

Detailed Comments of Government Departments

- (a) Comments of the District Lands Officer/Kowloon West, Lands Department (DLO/KW, LandsD):

the Site will affect various KILs and unleased and unallocated Government land under the purview of Transport Department (TD) and Highways Department (HyD). It is presumed that the applicant will liaise with TD and HyD on any interface issues and future maintenance/management arrangement.

- (b) Comments of the Chief Estate Surveyor/Urban Renewal Section, Lands Department (LandsD):

- (i) comments on KC-020 Development Project (DP) dated 27.1.2025 are still valid and applicable,

(I) as per the DP Report, the DP and CBS-2:KC aim to be holistically developed with proposed shared-use of a vehicular run in/out. Depending on the lot boundary of your proposed land grant for the DP, each land grant including the vehicular ingress/egress point(s) to be provided serving the lot should be self-sustained. Please refer to para. (iv) below. Urban Renewal Authority (URA) should also consult relevant Government departments including Planning Department (PlanD), Transport Department (TD) and Highways Department (HyD);

(II) as per the DP Report, the DP will explore the potential connection to the nearby To Kwa Wan MTR station exit. URA should consult relevant Government departments including PlanD, Railway Development Office of HyD and MTR Corporation;

(III) as per the DP Report, car parking spaces and L/UL facilities of the DP may be provided in its own basement and/or at CBS-2:KC. Depending on the lot boundary of the proposed land grant for the DP, each land grant including the car parking spaces and L/UL facilities to be provided serving the lot should be self-sustained. Please refer to paragraph (IV) below. URA should also consult relevant Government departments including PlanD, TD and HyD;

Proposed Land Grant

- (IV) as per the DP Report, the DP and CBS-2:KC aim to be holistically developed and the DP may combine with part/whole of CBS-2:KC under one land grant (and with possibility of under different phrases). Depending on the lot boundary of the proposed land grant for the DP, each land grant including the car parking spaces and L/UL

facilities, E&M, vehicular ingress/egress point(s), recreational facilities etc. to be provided serving the lot should be self-sustained;

- (V) should the Secretary for Development (SDEV) decide to authorize URA to proceed with the DP, URA is required to submit the land grant application to LandsD for implementation of the DP including the planning intention contained in the OZP. There is no guarantee that the application will be approved, and the maximum gross floor area (GFA) and other development parameters will be incorporated into the future land grant conditions. If the land grant is approved by LandsD acting in its capacity as the landlord, it will be subject to such terms and conditions (including payment of premium and administrative fee) as considered appropriate by LandsD at its absolute discretion;

Project Implementation Programme

- (VI) since the Lands Resumption Ordinance (Cap. 124) as amended by the Development (Town Planning, Lands and Works) (Miscellaneous Amendments) Ordinance 2023 comes into effect on 1.9.2023, the DP is not exempted under s.23(2) of Cap. 124. The new statutory requirement for gazettal of Notice of Proposed Resumption (NOP) is required to be followed. URA should add the NOP procedures and the time requirement into the tentative implementation programme at Part 3-3.3 of the DP Report for further comments; and

Road Closure

- (VII) as per the DP Report, the DP site boundary comprises existing public roads/streets, pavements and lanes. If URA intended to close the concerned existing public roads/streets, pavements and lanes, URA should consult relevant Government departments including TD and HyD, and follow the administrative and statutory requirements under Cap. 370 as appropriate including allowing sufficient time for necessary local consultation and statutory/gazettal procedures. In addition, under the streamline arrangement, URA is advised to plan well ahead all the required work in relation to the land resumption application under Cap. 124, the road scheme application under Cap. 370 and other relevant applications (if any); and

- (ii) for other various technical assessments in connection with the subject application, she defers to the advice of other relevant departments.

- (c) Comments of the Chief Estate Surveyor (Railway Development Section/Head Office), LandsD (CES/RDS, LandsD):

the Site falls within the boundary of Shatin to Central Link (SCL). The applicant should ensure that the DP will not encroach onto the vested area or the easement of SCL; and no adverse comment on the application from railway land administration point of view.

(d) Comments of the Commissioner for Transport:

Vehicular and pedestrian access

- (i) the vehicular and pedestrian access of the Site should be read in conjunction with the applicant's proposal for the combined development of KC-020 and CBS-2:KC, for which the project Traffic Impact Assessment (TIA) was submitted in July 2025. As the access arrangement is consistent with the accepted arrangement, she has no particular comment;

Parking facilities and PVP provision

- (ii) the provision of parking facilities, including the PVP provision, is based on the development parameters of this specific planning application for the KC-020 site only. As the derivation of the parking provisions accords with the development parameters and does not contradict the agreed overall provision of the combined development, he has no particular comment; and

TIA

- (iii) he considers the TIA associated with this planning application to be solely for the purpose of this specific application. As confirmed by the applicant's consultant, the traffic impact specified in this TIA is capped and consistent with that of the project TIA submitted in July 2025. The required traffic improvement measures are also in line with the project TIA. In this regard, she has no particular comment.

(e) Comments of the Director of Environmental Protection:

- (i) the applicant seeks planning permission for proposed minor relaxation of domestic PR and BH restrictions for permitted residential development with commercial/retail uses, and proposed 'Public Vehicle Park' use for URA's Development Project (KC-020) at Ma Tau Wai Road/Lok Shan Road (the Site). Based on the supporting planning statement including the Air Quality Impact Assessment (AQIA), the Environmental Assessment (EA) and Drainage and Sewerage Impact Assessment (DSIA) submitted by the applicant. It is noted that the current proposal submitted under the captioned application is a Notional Design for illustration purpose for technical assessments. Based on the findings of the AQIA, EA and

DSIA, insurmountable environmental impact associated with the Notional Design is not anticipated and summarized as follows:

- (I) on air quality, quantitative AQIA has been conducted for the Site. By properly locating the air sensitive uses including openable windows and fresh air intakes at above 1/F (4.55mAG/15.45mPD) and not be located within the Air Quality Objectives (AQO) exceedance zone, adverse air quality impact is not anticipated;
 - (II) on noise, a road traffic noise impact assessment has been carried out for the Notional Design and all practicable noise mitigation measures have been adopted to achieve 96% compliance of road traffic noise standard. Also, the potential fixed noise impact has been assessed for the Notional Design and the predicted fixed noise level at all Noise Sensitive Receivers (NSRs) will comply with the relevant standard. In future detailed design stage, all the noisy facilities such as ventilation system for podium will be properly designed by various means such as selection of quiet equipment, use of shielding device, acoustic louvers silences, semi/full enclosure;
 - (III) on sewage, the SIA has demonstrated that the capacity of existing sewerage system is sufficient to cater for the sewerage generated from the Notional Design. No sewerage upgrading works is required; and
- (ii) on the above basis, he has no objection to the application from the environmental perspective. As he understands from URA that the draft land grant from the Site will be circulated for departmental comments at later stage, he intends not to impose planning conditions on the applications. Nevertheless, he still has comments on the AQIA, EA and DSIA as provided in Annex A of Appendix V of MPC Paper No. A/K10/280 for further consideration and refinement during detailed design stage.
- (f) Comments of the Director of Fire Services (D of FS):
- (i) he has no comment on the application subject to water supplies for firefighting and fire service installations being provided to the satisfaction of the D of FS under other regulatory regimes;
 - (ii) should the application be confirmed to fall under the regulatory regimes, i.e. lands, buildings, licensing and other control regimes, he has no objection to removing the relevant approval conditions without the need for further consultations from the Fire Services Department;

and

- (iii) detailed fire services requirements will be formulated upon receipt of a formal submission of Short Term Tenancy/Short Term Waiver, general building plans or referral of application via relevant licensing authority. Furthermore, the EVA provision in the captioned work shall comply with the requirements as stimulated in Section 6, Part D of the Code of Practice for Fire Safety in Buildings 2011, which is administered by the Building Authority.

Recommended Advisory Clauses

- (a) to note the comments of the District Lands Officer/Kowloon West, Lands Department (LandsD) that:
- the Site will affect various Kowloon Inland Lots and unleased and unallocated government land under the purview of Transport Department (TD) and Highways Department (HyD). It is presumed that the applicant will liaise with TD and HyD on any interface issues and future maintenance/management arrangement.
- (b) to note the comments of the Chief Estate Surveyor/Urban Renewal Section, LandsD that:
- comments on KC-020 Development Project (DP) dated 27.1.2025 are still valid and applicable,
 - (I) as per the DP Report, the DP and CBS-2:KC aim to be holistically developed with proposed shared-use of a vehicular run in/out. Depending on the lot boundary of your proposed land grant for the DP, each land grant including the vehicular ingress/egress point(s) to be provided serving the lot should be self-sustained. Please refer to para. (iv) below. Urban Renewal Authority (URA) should also consult relevant Government departments including Planning Department (PlanD), TD and HyD;
 - (II) as per the DP Report, the DP will explore the potential connection to the nearby To Kwa Wan MTR station exit. URA should consult relevant Government departments including PlanD, Railway Development Office of HyD and MTR Corporation;
 - (III) as per the DP Report, car parking spaces and L/UL facilities of the DP may be provided in its own basement and/or at CBS-2:KC. Depending on the lot boundary of the proposed land grant for the DP, each land grant including the car parking spaces and L/UL facilities to be provided serving the lot should be self-sustained. Please refer to paragraph (IV) below. URA should also consult relevant Government departments including PlanD, TD and HyD;

Proposed Land Grant

- (IV) as per the DP Report, the DP and CBS-2:KC aim to be holistically developed and the Project may combine with part/whole of CBS-2:KC under one land grant (and with possibility of under different phrases). Depending on the lot boundary of the proposed

land grant for the DP, each land grant including the car parking spaces and L/UL facilities, E&M, vehicular ingress/egress point(s), recreational facilities etc. to be provided serving the lot should be self-sustained;

- (V) should the Secretary for Development (SDEV) decide to authorize URA to proceed with the DP, URA is required to submit the land grant application to LandsD for implementation of the DP including the planning intention contained in the OZP. There is no guarantee that the application will be approved, and the maximum gross floor area (GFA) and other development parameters will be incorporated into the future land grant conditions. If the land grant is approved by LandsD acting in its capacity as the landlord, it will be subject to such terms and conditions (including payment of premium and administrative fee) as considered appropriate by LandsD at its absolute discretion;

Project Implementation Programme

- (VI) since the Lands Resumption Ordinance (Cap. 124) as amended by the Development (Town Planning, Lands and Works) (Miscellaneous Amendments) Ordinance 2023 comes into effect on 1.9.2023, the DP is not exempted under s.23(2) of Cap. 124. The new statutory requirement for gazettal of Notice of Proposed Resumption (NOP) is required to be followed. URA should add the NOP procedures and the time requirement into the tentative implementation programme at Part 3-3.3 of the DP Report for further comments; and

Road Closure

- (VII) as per the DP Report, the DP site boundary comprises existing public roads/streets, pavements and lanes. If URA intended to close the concerned existing public roads/streets, pavements and lanes, URA should consult relevant Government departments including TD and HyD, and follow the administrative and statutory requirements under Cap. 370 as appropriate including allowing sufficient time for necessary local consultation and statutory/gazettal procedures. In addition, under the streamline arrangement, URA is advised to plan well ahead all the required work in relation to the land resumption application under Cap. 124, the road scheme application under Cap. 370 and other relevant applications (if any).

- (c) to note the comments of the Chief Estate Surveyor (Railway Development Section/Head Office), LandsD that:

- the Site falls within the boundary of Shatin to Central Link (SCL). The applicant should

ensure that the DP will not encroach onto the vested area or the easement of SCL.

(d) to note the comments of the Chief Building Surveyor/Kowloon, Buildings Department:

- (i) all building works are subject to compliance with the Building Ordinance (BO) and its allied regulations;
- (ii) detailed comments under the BO on individual sites for private developments such as permissible plot ratio (PR), site coverage, means of escape, emergency vehicular access, private streets, and/or access roads, open space, barrier free access and facilities, compliance with the sustainable building design guidelines, etc. will be formulated at the building plan submission stage; and
- (iii) in general, any portion of canopy within the Lot boundary is GFA accountable under the Building (Planning) Regulations (B(P)R). Subject to further particulars/details on the design of the proposed canopy to be provided in building plan submission stage, any application for exemption from and/or modification of regulation 21 and 23(3)(a) of the B(P)R for exemption of such area from GFA calculations will be considered. The applicant's attention is also drawn to section 31 of the BO regarding projections on or over streets.

(e) to note the comments of the Chief Engineer/Railway Development 1-1, Railway Development Office, Highways Department that:

- with reference to Development Bureau (DEVB) Technical Circular (Works) (TC(W)) No. 1/2019 and/or Practice Notes for Authorized Persons, Registered Structural Engineers and Registered Geotechnical Engineers (PNAP) APP-24, the applicant should seek comments from MTR Corporation Limited with respect to the operation, maintenance, safety and any future works required for the existing railways.

(f) to note the comments of the Director of Environmental Protection that:

- as he understands from the applicant that the draft land grant for the Site will be circulated for departmental comments at a later stage, he intends not to impose planning conditions on the application. Nevertheless, he still has comments on the Air Quality Impact Assessment (AQIA), Environmental Assessment (EA) and Drainage and Sewerage Impact Assessment (DSIA) as provided in **Annex A** for further consideration and refinement during detailed

design stage.

(g) to note the comments of the Director of Fire Services that:

- detailed fire services requirements will be formulated upon receipt of a formal submission of Short Term Tenancy/Short Term Waiver, general building plans or referral of application via relevant licensing authority. Furthermore, the EVA provision in the captioned work shall comply with the requirements as stimulated in Section 6, Part D of the Code of Practice for Fire Safety in Buildings 2011, which is administered by the Building Authority.

(h) to note the comments of the Antiquities and Monuments Office, DEVB (AMO, DEVB) that:

- given the comparatively long history of the pre-war building at No. 344 Ma Tau Wai Road, should there be any redevelopment plan affect it, the applicant is requested to produce a photographic record of the interior and exterior of the building and share it with AMO for documentation purposes and for potential future use in research, exhibitions and educational programmes.

Detailed Comments of the Director of Environmental Protection on Air Quality Impact Assessment (AQIA), Environmental Assessment (EA) and Drainage and Sewerage Impact Assessment (DSIA):

Comments on Appendix C Air Quality Impact Assessment (AQIA)

1. Section 2.3.1: The AQMS data for year 2025 is now available. Please update.
2. Table 2.6: Please bold the values of peak season O3 which exceed AQO.
3. Section 2.7.12 and Appendix 8:
 - (a) Please extract the road links map under Appendix 8 as the figure for easy reference.
 - (b) Please also update the site boundary / location under the road links map, which is not representing the project site.
 - (c) Section 2.7.10 states that no start emission will be applied for Primary Distributor (PD) and District Distributor (DD). But the road links map still indicates the PD & DD roads with start emission, particularly those adjacent to the project site (e.g., PD roads IDs: 91-94). Some double-yellow lines are also marked as roads with start emission (e.g., Road IDs 59, 60, 63). Please critically review as it may lead to over-conservative results, especially given that **hourly & annual NO2 exceedances** were identified at ASRs D02 – D06 (which are both adjacent to PD roads) under Table 2.12.
 - (d) Please also supplement the start profile and Road Segment as filled template for SAMP result.
4. Section 2.8.6: In view of the hourly & annual NO2 exceedances, please consider to use the daily profile of lowest temperature and relative humidity data in each hour for each month for hourly NO2, and the daily profile of averaged temperature and relative humidity data in each hour for each month for annual NO2, instead of monthly data
5. Section 2.8.7: Please review the sentences “Traffic forecast, based on the traffic count including vehicles from all concrete batching plants within the vicinity” as there is no CBP near the project site area.
6. Table 2.12: Please also present the AQOs for the pollutants for easy reference.
7. Section 2.10.2 and 3.1.2: Please improve the readability of the sentence “...will not be subject to adverse air quality impact as some portion of the fresh air intake location at G/F except exceedance zone”.
8. Section 2.11: Please review whether there will be HGV/coach parking at the proposed public vehicle park and whether precise approach is required to model the air quality impact from the vehicle park.
9. Section 3: Please supplement the conclusion for construction phase.
10. Section 3.1.3: Please replace “environmental” with “air quality impact”.
11. Appendix 2:
 - (a) Please rectify the typo “*Pubic*” to “*Public*” under every table of Appendix 2.

- (b) Please clarify how the type of vehicles of different PTIs are being defined, i.e., only LPG for Sheung Wo St., Chi Kian St and Ko Shan Rd; only diesel for Maidstone Rd and Wai King St. If the PLB types are identified through site survey, please supplement into the report. [Note: Section 2.7.6 only indicates the identified PLB terminuses via site survey]
 - (c) Calculation Spreadsheet “*AQIA_VI.0_PTI.xlsx*”: Under the “*Input parameter_PTI*” spreadsheet, the length for Sheung Wo St. PLB terminus should be less than 150m as it is defined with LPG vehicles only. The length of emission source under Appendix 2a also exceeds 150m. Please review.
12. Appendix 10: Please supplement the calculation spreadsheet “Estimated of VKT for local and rural roads (ATC 2024)”. Please also consider to review whether ATC 2024 Amendment 1 (issue date: 12 Dec 2025) should be incorporated.
13. Appendix 11 – Contour Maps:
- (a) Appendix 10: Please revise the numbering to “Appendix 11.10”.
 - (b) Appendix 11.11 to 11.14: Since no exceedance or RSP and FSP are found at 1.5mAG, please review whether the contour maps at 4.55mAG should still be retained.
14. Figure 5 and 9: Please update the figure with higher resolution.

Comments on air modelling

1. The y-coordinate of MR01 in the report is different from that in AERMOD. Please rectify.
2. An over-conservative approach (i.e., assuming 100% NOX to NO2 conversion and adopting NOX as NO2 background) was used in calculating NO2 hourly and daily averages, resulting over-predictions and unrealistic exceedances. Please correct the discrete results and contour plots of NO2 hourly and daily averages, as listed below, using Ozone Limiting Method (as stated in Section 2.9.2) to convert NOX into NO2 and adopting NO2 (instead of NOX) from PATH as background contribution to avoid over-predictions:
 - Table 2.12 The results 19th highest hourly NO2 and 10th highest daily NO2
 - Appendix 9 The results 19th highest hourly NO2 and 10th highest daily NO2
 - Appendix 11 Contour map (1.5mGA) for 19th highest hourly NO2 and 10th highest daily NO2
 - Appendix 11 Contour map (4.55mGA) for 19th highest hourly NO2 and 10th highest daily NO2
3. The consultant is also suggested to review whether there is any planned sensitive use at 1.5mAG and to exclude this level from assessment if there is no sensitive use to avoid showing unreasonable predictions in the report.

Comments on Appendix D Environmental Assessment (EA)

1. Section 5 Water Supply Impact Assessment is out of EPD's ambit, please remove this section or consult Water Supply Department directly.

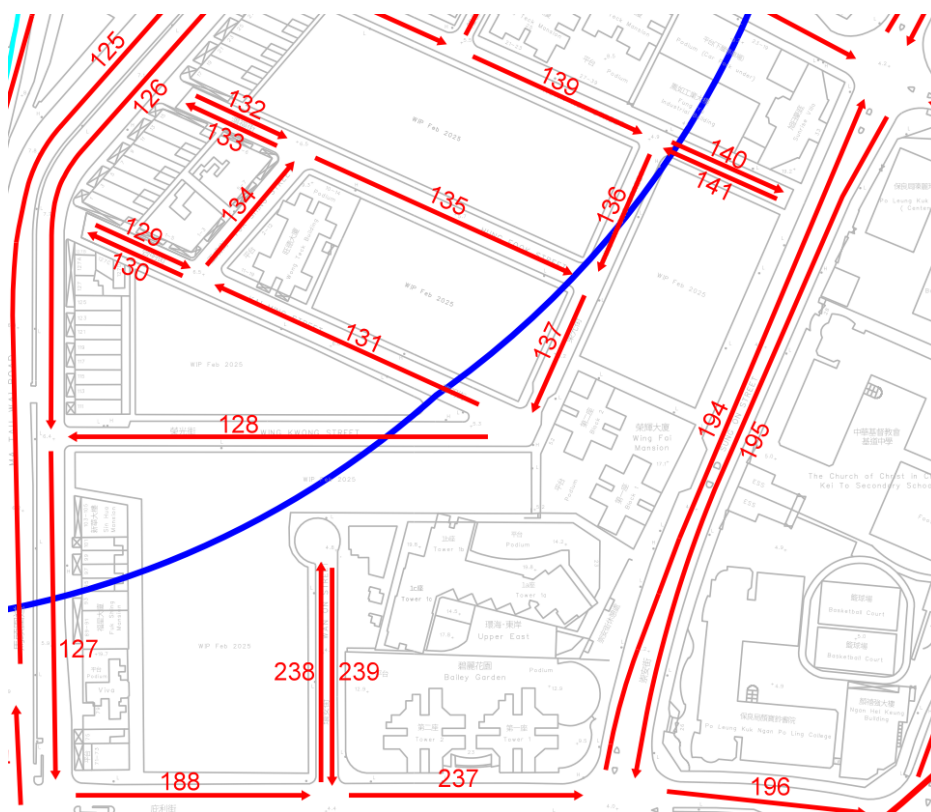
General Comments on Noise Impact Assessment

It is noted that the detailed design layout of the proposed development is not available at this stage. The notional design layout is not finalised and it is subject to change. However, according to this report, full compliance with the traffic noise planning standard of 70 dB(A) cannot be achieved. It appears that the consultant has not yet exhausted all practicable noise mitigation designs/measures to reduce the traffic noise impact [Base case: compliance rate of 44% (max: 79 dB(A)) ; Mitigated case: compliance rate of 96% (max: 71 dB(A))] in particular with the feasibility and opportunity of this relatively large redevelopment site. For example, measures including alternative building form to avoid orientation of noise sensitive facades directly facing nearby roads, construction of barrier / canopy on podium with projection beyond the site boundary, architectural fins, etc. are available and should be explored to further abate the noise impact.

With the above general comment, we have the following technical comments on the present report:

Technical Comments on Noise Impact Assessment

1. Appendix 2
It appears that some of the roads listed in Appendix 2 are out of 300m assessment area, such as Ngan Hon Street (No. 140 & 141) and Wan On Street (No. 238 & 239). Please clarify.



2. Noise Model

- a) The HV% for Road No. 16, 87, 161 & 167 in AM peak noise model is inconsistent with Appendix 2.
- b) The HV% for Road No. 156 in PM peak noise model is inconsistent with Appendix 2.

3. Appendix 6 & Figure 3

It appears there are different layout for different floors. However, there is only one figure to show the whole layout design without the separation of rooms. Please clarify.

4. Section 3.2.3

Please review the ASR for those NAPs not facing Ma Tau Wai Road.

5. Figure 5

Please review and consider to include To Kwa Wan Market Substation and rooftop chillers at Po Leung Kuk Madam Chan Wai Chow Memorial School as fixed noise sources.

Comments on Appendix F Drainage and Sewerage Impact Assessment (DSIA)

General Comment on Sewerage Impact Assessment

1. It is noted that the proposed development is subject to change during the detailed design stage. Should there be any changes of development parameters other than the latest submitted proposal, a revised submission has to be submitted to EPD for approval accordingly
2. Please be reminded that the implementation of local sewer connection/diversion/upgrading works shall meet the satisfaction of DSD. Please also seek DSD's view and agreement on the DSIA.
3. Please provide softcopy of the report (in pdf) and calculation spreadsheet (in Excel) as well as all Response to Comments from EPD and DSD as appendix. Please also highlight the revised/updated content of the DSIA in the next submission to facilitate review.

Technical Comments on Sewerage Impact Assessment

Section 3.3, Section 3.4, Appendix 3.1 and Appendix 3.2

4. It is noted that two options of sewage discharge are discussed in the DSIA. For the sake of clarity, please only include the proposed option in the submission. Please review and revise the corresponding paragraphs accordingly.
5. It is noted that an updated SIA had been conducted under URA's "Consultancy Services for Underground Utilities Diversion Works for Project CBS-2 - Kau Pui Lung Road / Chi Kiang Street, Kowloon City, Kowloon & Project KC-020 – Ma Tau Wai Road /Lok Shan Road, Kowloon City, Kowloon" dated Dec 2025. Hence, the quoted SIA for CBS:2-KC conducted in 2023 is no longer valid. Please consult the project proponent and incorporate the latest design parameters and sewerage works in the subject submission, and revise corresponding paragraphs in the submission accordingly.

Section 3.4.4 and Section 3.4.12

6. Considering the proposed development will lead to additional sewage flow to the existing sewerage system, please remove the statement "*it is considered that the Notional Design of the Project would only have insignificant impact to the downstream trunk sewers ...*" for the sake of factual correctness.

Section 3.4.6 and Section 3.4.13

7. It is noted that detailed survey will be conducted to confirm the manhole settings and the corresponding pipe capacity. Please indicate in the tentative programme of the proposed manhole survey for reference. Please agree with DSD on the result of manhole survey. Should there be any changes of the manhole settings, a revised SIA with updated hydraulic calculations based on the actual settings of the concerned manholes and/or sewer segments, has to be submitted to EPD for approval accordingly.

Table 3.2

8. Table 3.2 indicates some existing sewers would require upgrade or potential upgrade. For the sake of clarity, please clearly indicate the party/parties responsible for the proposed upgrading works in the DSIA.