

Responses to public comments table

## Section 16 Planning Application for Submission of Layout Plan for Permitted 'Flat' and 'Social Welfare Facility' Uses at Tsuen Wan Inland Lot 5 and Lot No. 429 in D.D. 399, Ting Kau, Tsuen Wan (Application No. A/TWW/130)

	Public Comments	Responses to Comments
1.	The proposed redevelopment of the existing hotel will produce construction waste and thus inducing adverse environmental impacts.	The query on construction waste associated with redevelopment of the existing hotel is well-noted. The Applicant will endeavour to reduce construction waste by considering the following measures at detailed design stage of the proposed redevelopment.
		Proper planning for waste reduction would be carried out before demolition by preparing a Waste Management Plan to identify key waste types, set out waste reduction programs and targets, and so efficient on-site sorting could be carried out at early stage for proper reuse and recycle of the construction and demolition material (C&D material) at a later stage.
		The waste management plan would help to increase the efficiency of the reuse and recycle of the C&D material, e.g. prior to the demolition of a building, the electrical appliances or furniture could be taken down first for recycling as practical as possible, followed by non-recyclable fittings and finishes such as tiles. Various kinds of waste materials could then be separated on-site for recycling, reuse or disposal as much as possible.
		Furniture (e.g. beds, tables, sofas, chairs) and electrical appliances in good condition (fridges, TV, lamps, hair dryers, etc.) could be donated to charity organizations or transitional housings as practical as possible.
		In addition, Inert construction waste could also become recyclables too. In Hong Kong, it is not uncommon to adopt recycled concrete for new building construction. There is a credit under HKBEAM Plus V2.0 for New Building regarding Construction and Demolition Waste Recycling that at least 15% of demolition waste would be recycled for achieving this credit. The demolished concrete can be crushed into small pieces in the Construction Waste Handling Facility for providing raw material for concrete production.

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		There is one existing facility in Tseung Kwan O Area 137 and one in the future Tseung Kwan O Area 132 reclaimed land.	
		Besides, according to the examples of recycled materials for construction industry listed by the EPD¹, excavated materials and public fill could be recycled and reused as filling materials and land reclamation. Therefore, the C&D material generated could be sorted and reused on-site at priority while the remaining C&D material could be delivered as off-site and reused. For example, K. Wah Construction Products Limited is one of the companies who bring the environmental technology to convert C&D material and waste glass to eco-blocks and eco-pavers which have the merit of significantly reducing the burden on landfills².	
		After implementing the above measures, the potential C&D waste generated from the redevelopment could be substantially reduced. The Applicant will consider adopting these measures at detailed design stage where possible and applicable.	
		Remark: [1]: https://www.epd.gov.hk/epd/misc/cdm/products1.htm [2]: https://www.ecopark.com.hk/files/tenants-factsheet/KWah-About.pdf	
2.	The proposed development does not in line with the intention of the previous S12A approval.	The Application Site was the subject of a S12A rezoning application No. Y/TWW/7 for rezoning the Application Site from mainly "CDA(1)" zone to "R(B)2" zone to facilitate wholesale conversion of the existing hotel into a residential development, which was agreed by the Town Planning Board on 2.6.2022.	
		The Tsuen Wan West OZP was subsequently approved on 14.11.2023 to reflect the approved "R(B)2" zone for the Application Site. According to the Notes of the OZP, the "R(B)2" zone is intended primarily for medium-density residential developments. Under the subject "R(B)2" zone, any developments or	

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		redevelopments of the existing building are subject to development restrictions stipulated on the Notes of the "R(B)2" zone including
		<ul> <li>(i) maximum GFA of 29,400m²;</li> <li>(ii) no part of the structures shall exceed 77mPD; and</li> <li>(iii) a GFA of not less than 760m² for GIC facility shall be provided.</li> </ul>
		It should be noted that the proposed redevelopment complies with the planning intention and development restrictions under the subject "R(B)2" zone and the proposed uses 'Flat' and 'Social Welfare Facility' are always permitted under the subject "R(B)2" zone. It should be stressed that flexibility for development or redevelopment of the existing building is allowed under OZP.
		It should also be highlighted that the proposed redevelopment does not deviate from the indicative scheme under the previous S12A application in terms of uses (i.e. 'Flat' and 'Social Welfare Facility'), domestic GFA (i.e. not more than 29,400m²) and the provision of social welfare facility (i.e. 60-place Day Care Centre for the Elderly with GFA of not less than 760m²).
		Due to the limited design flexibility of the previous indicative S12A scheme as constrained by the building bulk of the existing hotel and in order to properly address comments from the TPB members, the Applicant has explored the possibility of redevelopment instead in order to:
		<ul> <li>(i) enhance the design and accessibility of the social welfare facility with open space provision;</li> <li>(ii) provide more visual and design merits (e.g. building separation and accessible roof garden) for enhancing spatial quality and setting; and</li> <li>(iii) enhance flexibility in flat layout and unit configuration and</li> </ul>

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		increase housing supply in response to changing market need and for achieving a more desirable development in planning and design terms, which could not be achieved through wholesale conversion.
3.	The existing road network and public transport provision in the area may not support the additional population induced by the proposed development.	A Traffic Impact Assessment (TIA) has been carried out in support of the subject planning application. The TIA report concluded that the Proposed Development will be acceptable in traffic terms and it is noted that TD has no comment on the TIA submitted.
		Nevertheless, to accommodate the potential transport demand induced by the Proposed Development, additional transport services could be considered if required, subject to the consideration of and consultation with relevant government departments and/or stakeholders during detailed design stage.