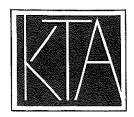
#### By Hand and Email

Our Ref: S3095/152\_WELL/23/004Lg

12 March 2024

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

Dear Sir/Madam,



PLANNING LIMITED 規劃顧問有限公司

UNIT K, 16/F, MG TOWER 133 HO! BUN ROAD, KWUN TONG KOWLOON, HONG KONG

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Proposed Flat with Permitted Shops/Eating Places at Nos. 152 - 164 Wellington Street in Sheung Wan - S16 Planning Application -TPB Ref.: A/H3/449 Further Information No. 2

Reference is made to the captioned S16 Planning Application submitted to the Town Planning Board ("TPB") on 28 December 2023 and departmental comments from various government departments received in February 2024.

In response to the comments received, please find attached 4 hard copies of the Further Information ("F.I.") submission. The submission document consists of:

#### Response-to-Comment Table

Appendix 1 Revised Landscape Proposal

Appendix 2 Geotechnical Planning Review Report

Appendix 3 Drainage and Sewerage Impact Assessment

Appendix 4 Revised Traffic Impact Assessment

Justifications on Site Classification and Setback Requirements on Wa On Lane Appendix 5

Revised Environmental Assessment Appendix 6

Meanwhile, should you have any queries in relation to the attached, please do not hesitate to contact Mr Kenneth To or the undersigned at 3426 8840.

Thank you for your kind attention.

Yours faithfully

For and on behalf of

KTA PLANNING LIMITED

Gládys Ng

Encl.

HKDPO - Mr Cannon Wong (By Email) CC.

the Applicant & Team

KT/GN/vy





(Planning Application No: A/H3/449)

### **RESPONSE-TO-COMMENT TABLE**

Comments	Response
Comments from Landscape Unit, UD&L Section, Planning Department: (Contact Person: Mr Chak Man NGAI; Tel: 3565 3955)  • Annex II - It is generally noted that the north sign on all landscape plans and the site description regarding site orientation (e.g. para 2.1) are incorrect. Please revise accordingly. The applicant is also advised to check the inconsistencies of north signs in all other drawings in the	Noted. North sign on all landscape drawings and the site descriptions regarding the site orientation have been checked and revised accordingly.
<ul> <li>Appendix III under Annex II - Regarding the insufficiency of communal open space mentioned in para. 4.2.2 of Annex II, the applicant is advised to maximize the provision of communal open space as far as practicable.</li> </ul>	Noted. Additional communal open space has been provided at R/F to fulfil the minimum requirement of 1sq.m. open space per person in accordance with HKPSG Chapter 4. Please refer to the revised drawing on Open Space Provision attached in <i>Appendix 1</i> .
• The applicant should be advised that approval of the application does not imply approval of tree works such as pruning, transplanting and felling under lease and/or outside the applicant site. The applicant is reminded to seek approval for any proposed tree works from relevant departments prior to commencement of the works.	Noted.
Comments from Chief Architect/Architectural Services  Department: (Contact Person: Mr Sherman SUM; Tel: 2582 5314)	
• In order to enable our office to comment on the architectural and visual impact of the development, the applicant is advised to include	

Comments	Response
some images/photomontages of the proposed development in its surrounding context from different vantage points and a schematic section showing the stepped Building Heights (BHs) in the district to demonstrate whether the proposal would be visually compatible with the existing surrounding environment.	+120mPD) as stipulated in the Approved OZP. Nonetheless, the Applicant has prepared 3 perspective drawings to illustrate the environment at street level upon completion of the Proposed Development (Figure 4.2 of the Supporting Planning Statement refers).
<ul> <li>Comments from Head of the Geotechnical Engineering Office, Civil Engineering and Development Department: (Contact Person: Ms Candy CHO; Tel: 2762 5383)</li> <li>It is noted that the maximum gradient across the site boundary along Wa On Lane sitting-out Area to the site boundary along Wellington street is greater than 15°. Therefore a Geotechnical Planning Review Report in support of the planning application is required according to the GEO Advice Note for Planning Applications Under Town Planning Ordinance (CAP.131) (Appendix II).</li> </ul>	A refer to the Geotechnical Planning Review Report in <i>Appendix 2</i> .
Comments from Environmental Protection Department: (Contact Person: Mr Kelvin CHOI; Tel: 2835 1594)	
General  1. Please clarify if there will be central air conditioning for the proposed clubhouse/ retail shop/eating place, and advise the proposed location of fresh air intakes, if applicable.	Central air conditioning would be provided to serve the clubhouse, retail shop and eating place. The fresh air intake point would be located at a higher level near the podium top and on the side facing Wa On Lane Sitting-Out Area (and away from road).
Sewerage 2. The title of DSIA "S16 Planning Application for Proposed	Noted, the report title has been amended ( <i>Appendix 3</i> refers).

Comments		Response		
	Composite Redevelopment at 152-164 Wellington Street, Central" is not same as the title of planning statement "Proposed Flat with Shop and Services/Eating Places at Nos.152-164 Wellington Street in Sheung Wan". Please consider to tally the title.			
3.	Please revise the typo "STREEET" in the first page of DSIA.	Noted, the typo has been amended (Appendix 3 refers).		
4.	Section 2.3.1: Existing manholes FMH7029758 and FMH7029761 are also connected from the application site to the 400mm inner diameter sewage pipe. Please revise.	S2.3.1 has been amended accordingly ( <i>Appendix 3</i> refers).		
5.	Section 2.3.3: The existing pipe should be read as FWD7033374 instead of FWD70133374. Please revise.	S2.3.3 has been amended accordingly ( <i>Appendix 3</i> refers).		
6.	Section 2.4.2 Table 2.1 & Appendix 2.1 Table 1:  i) The number of flats 150 units in the tables does not tally with the application form and planning statement, which the number of flat is 175 units.	The flat number has been amended accordingly (Appendix 3 refers).		
	ii) Please reference the average household size of 2.1 of residential tower. Please consider to adopt 2.3 ppl per flat as the average domestic household size in "Population Census 2021 - District Council Constituency Area of Chung Wan".	While the average household size of 2.3 ppl per flat is indicated in "Population Census 2021 - District Council Constituency Area of Chung Wan", this area includes some part of mid-levels with larger flat size and in turn more population. Whereas, the average household side of 2.1 ppl per flat in "Population Census 2021 – Tertiary Planning Units - 114" covers the immediate neighbourhood and is considered more representative.		
		Nevertheless, with the proposed population of 368 persons remains unchanged, the Sewerage Impact Assessment ( <i>Appendix 3</i> refers) has been updated to adopt '2.3 ppl per flat' to represent a worse-case-		

Comments		ts	Response		
			scenario. The result confirms that the Proposed Development would not cause adverse impact to the public sewerage system.		
	iii)	Please confirm that no restaurant is involved in the clubhouse as only UFF type J11 is deployed.	Please be confirmed that there would be no restaurant in clubhouse.		
	iv)	According to the podium plans in Appendix 1.1, the commercial area consists of retail and F&B. Please also include the UFF type J10 in the commercial area in the sewage flow estimation and please justify the number of employees.	UFF type J10 has been included. Population density assumption has been included into the footnote.		
	v)	Table 2.1 Note (5): It should be read as "Backwash discharge from swimming pool is included in the peak flow."	Table 2.1 Note (5) has been amended accordingly ( <i>Appendix 3</i> refers).		
7.		pendix 2.1 Table 3b: For Catchment C, please review the culation of the cross-sectional area and velocity of the pipe.	Appendix 2.1 Table 3b has been amended accordingly (Appendix 3 refers).		
8.	FMI hyd unti	pendix 2.1 Table 4a: There are another downstream manhole H7029802 of S2 manhole. Please revise the sewer segment of raulic checking. Also, please conduct the hydraulic checking I the downstream manhole FMH7029993 to include the rage flow from the catchments along the Queen's Road Central.	Appendix 2.1 Table 4a has been amended accordingly (Appendix 3 refers).		
Noi	se				
9.		ase attach Transport Departments' written endorsement on the pted traffic forecast data to the NIA.	The traffic consultant has submitted the traffic forecast data to TD for endorsement. The endorsement will be provided when it is available.		

Comments	Response
Comments from Chief Engineer/Hong Kong and Islands, Drainage Services Department: (Contact Person: Mr Euclid NG; Tel: 3101 2359)	
• There is also a connection from the subject site to manhole no. FMH7029782. Please clarify if that connection would be abandoned. Besides, please state clearly that the applicant would be responsible for the proposed abandoning works.	Please be confirmed that manhole no. FMH7029782 will be abandoned and the Applicant will be responsible for the proposed abandoning works. It has been included in the report.
• Appendix 2.1 – There is a typo. "Peak Flow (Witch Swimming Pool)" should be "Peak Flow (With Swimming Pool backwash)"	The typo has been amended ( <i>Appendix 3</i> refers).
Table 3b – Please review and adopt the most appropriate roughness values for sewer segments FWD7033728 and FWD7033405. According to our drainage record, the materials of these 2 sewer segments should be vitrified clay; and	Noted, the roughness has been amended based on vitrified clay.
• Table 3b – As it is assumed full bore capacity as the peak flow, there is no need to apply the peaking factor.	Noted, Table 3b has been amended (Appendix 3 refers).
Comments from Assistant Commissioner for Transport / Urban, Transport Department: (Contact Person: Mr Daniel K CHOW; Tel: 2829 5569)  Below are the comments on the planning application from the traffic engineering viewpoint:	

Comments	Response
Supporting Planning Statement	
Section 3.1.2:  2. Internal transport facilities should be provided according to the Hong Kong Planning Standards and Guidelines (HKPSG). The applicant is required to review the loading/unloading and parking arrangement for the construction and operation of the development and consider necessary measure to minimise the traffic impact to local roads and transport facilities. Sound justification should be provided for nil provision of internal transport facilities.	Please kindly refer to Section 2.4 of the submitted TIA for the detail justifications of nil provision of Internal Transport Facilities for your reference.  • Waived Internal Transport Facilities of small site (< 900 sq.m) within Commercial Zone in the SOHO and adjoining area as per OZP  • Well Coverage of Public Transport Services  • Site Constraints of very small footprint (site area = 612 sq.m. only) & irregular shape of site with essential column / structures  During construction, temporary construction access for loading/
	unloading vehicles within site would be reviewed in detail design stage.
Figure 3.1  3. It is noted from the Landscape Master Plan that the applicant proposed corner splay near the junction of Wellington Street/ Aberdeen Street. The applicant should further provide relevant check for sight line in accordance with requirements stated in the Transport Planning & Design Manual (TPDM). The proposal of landscape works, e.g. the shrubs/ plant at the edge planter near the junction of Wellington Street/ Aberdeen Street should also be carefully designed to avoid adverse impact on the road users' sightline in future.	The shrubs/ plant at the edge planter near the junction would be made lower to 800mm to safeguard unobstructed sightline. Sufficient sightline under existing stop control at the junction is also maintained as shown in <b>Figure 2.4</b> of the TIA attached in <i>Appendix 4</i> .

C	Comments	Response
S 4	ection 3.2.1:  The applicant proposed full-height setback of 2m and 1m along the site boundary at Wellington Street and Aberdeen Street respectively. The applicant should clarify if the setback area will be surrendered to the Government to form part of public footpaths or opened to form part of the footpaths for public access 24 hours at all time free of charge and without any interruption. In gist, the management and maintenance arrangement of the setback area should be determined.	Please kindly note that the setback along Wellington Street falls within an area shown as 'Road' in the prevailing OZP, while the setback along Aberdeen Street is a voluntary setback. The proposed setback proposal on both Wellington Street and Aberdeen Street is intended for 24 hours access of public at all time free of charge and without any interruption. Subject to further liaison with relevant Government department(s), the Applicant currently has no intention to surrender the setback areas to the Government.
		The Applicant would be responsible for management and maintenance of the setback area under the current proposal.
5	Aberdeen Street, the applicant should holistically review if the proposed setback areas at Wellington Street and Aberdeen Street could be designed to match with the width of existing public footpaths adjacent to the Application Site in order to improve the walkability of pedestrians. The associated modification to existing public footpaths/steps and the need for erection of pedestrian railings should also be taken into account.	The proposed setback of development for public passage on Wellington Street and Aberdeen Street to improve the pedestrian environment is based on the following considerations:  - With the proposed setback on Wellington Street and Aberdeen Street to improve the pedestrian conditions, the pedestrian walkway performance on these two footpath sections would be substantially improved with LOS A in 2033 Design Case under the LOS criteria (LOS C is the acceptance criteria) in Table 5.2. For conservative approach, the proposed pedestrian connection to sitting out area is not considered in the pedestrian assessment, as shown in Table A1 below and Table 5.3 of TIA:

Comments	Response				
	Table A1 - Year 2033 Design Pedestrian Walkway Performance				
	(with setback on Aberdeen Street)				
	Walkway Ref.   Actual   Effective   2033 Design Peak   LOS				
		Noon]			
	Street) (ped/peak hour) (PM)	)			
	AM[Noon](PM)				
	P4 2.2 1.2 150[365](255) A[A]				
	P5 2.1 1.1 130[295](205) A[A]	(A)			
	<ul> <li>proposed at G/F facing Aberdeen Street, the impact of s frontage to the effective width of walkway is consider significant.</li> <li>In addition, alternative safe, wider and convenient per route via the pedestrian connection within the P Development (stairs and accessible lift for BFA) can be as well, which allow bypass pedestrians among Aberdeen Wa On Lane and Wellington Street. As there is no closing off of this sitting area, pedestrian can walk through sitting area any time as well (including day time as periods).</li> <li>Figure Nos. 2.1 – 2.3 show the indicative traffic arrangement on Aberdeen Street footpath after Pedestrian railings and reprovision of traffic signage caprovided closer to edge of carriageway (say about 0.2 kerb as per TPDM Vol. 2 Section 3.9 Clause 3.9.2.19 similar to existing railing arrangement nearby), to maxing clear width of footpath after setback.</li> </ul>	edestrian Proposed e utilised in Street, gate for ough the nd peak signage setback. in be re- 2m from which is			

Comments	Response
	- The frontage of the site facing Wa On Lane direction is only 14.8m. With 1 m setback for widening of pavement on Aberdeen Street and possible construction constraints, the proposed depth of this portion of the building is less than 13 m. The structural columns for supporting the building are located along the edge facing Aberdeen Street and abutting the proposed set back. Within the remaining limited space, the design shall also cater for basic building provisions which include staircase for MOE, lifts and essential E&M rooms. Hence, it is technically difficult for allowance of further set back along Aberdeen Street based on the current design and site constraints.
<ul> <li>Section 3.2.2:</li> <li>6. The applicant should clarify whether the new pedestrian connection (staircase and disabled lift) between G/F and 1/F within the Application Site connecting Wa On Lane Sitting-out Area will be opened to the public and form part of the walkway for public assess 24 hours at all time free of charge and without any interruption, and should indicate the BFA route in the submission. Please also review if the proposed disabled lift could be relocated close to Wellington</li> </ul>	The new pedestrian connection (staircase and disable lift) between G/F and 1/F within the Application Site connecting Wa On Lane Sitting-out Area will be opened to the public and form part of the walkway for public assess 24 hours at all time free of charge and without any interruption.  The barrier free assess routing is indicated as red arrow as shown in the
Street for ease of operation.	Figures 2.1 and 2.3 of the revised TIA attached in Appendix 4.
Traffic Impact Assessment (TIA) Section 2.3:	The disabled lift is connected to the public footpath (hatched in green) as shown in <b>Figures 2.1</b> and <b>2.3</b> of the revised TIA attached in <i>Appendix 4</i> .
7. The applicant is encouraged to provide more space for footpath at Aberdeen Street for enhancing the walkability.	Please kindly refer to our responses to item 5.

Comments	Response			
Section 2.3.4: 8. The applicant should clarify with width of the new pedestrian connection.  Section 3.2.1:	As shown in <b>Figure</b> connecting Wellington wide.			
9. The applicant should make sure information for existing road-based public transport services is accurate and update as appropriate.	Noted. The information are updated as shown <i>Appendix 4</i> .			
Section 3.3.2: 10. All traffic peak hours, including noon peak, should be considered.	Please be advised the traffic count survey at noon-peak period was conducted and comparison among AM / Noon PM peak traffic flows are conducted as shown in <b>Table A2</b> below. The results showed that AM/ PM peak hour is more critical than noon peak hour. Thus, the traffic assessment of AM and PM peak period are conservative enough to assess the background traffic condition. In addition, the net difference in development traffic is negative as compared with reference case (always permitted commercial zone).  Table A2 - Comparison of Observed AM / Noon / PM Traffic Flows			
		AM peak	Noon peak	PM peak
	Survey Period	0730-0930	1200-1400	1730-1930
	Peak Hour	0730-0830	1200-1300	1730-1830
	Comparison of Major Link Flows within Study Area (pcu/hr)			
	Queen's Road Central	1,625	1,645	1,695
	Wellington Street	620	810	815
	Bonham Strand	600	710	730

Comments	Response			
	Aberdeen Street	245	265	340
	Total	3,090	3,430	3,580
Section 3.5.2 and Table 3.6				
11. Please review the dead width for calculating effective width of footpath, since some locations appear to be shopping frontage	Updated effective width calculation and walkway performance are shown in <b>Table 3.6</b> (with remarks).			
Section 4.2.9: 12. The applicant should make sure the information for the planned/committed developments adjacent to the Application Site considered in the assessment is accurate by conducting extensive search on the planned developments within the area of influence and checking with relevant parties if necessary. Furthermore, it appears that quite some planned developments in the vicinity of the Application Site are not captured, for example, 64-70 Wellington Street, 92-96 Wellington Street, 16-20 Gage Street, etc.  Noted. Additional planned developments have 1 shown in revised Tables 4.4 - 4.5 and revised Figure 4.6 in Appendix 4.  The vehicular traffic and pedestrian assessment updated as shown in Tables 5.1 - 5.3.		nd revised Figure on assessment und	es 4.1 – 4.2, 4.4 and	
<ul> <li>Section 4.3</li> <li>13. Please include the comparison of the trip generation and attraction between the proposed development and existing use.</li> <li>Section 5.1 and Appendix B</li> <li>14. Please clarify if site factors have been considered in the junction assessment calculations.</li> </ul>	The comparison of t proposed development revised TIA attached in Please refer to the note of Junctions J1 and J4	and existing a Appendix 4.  s in revised juin Appendix	g use is shown i unction assessmen B of TIA for the	n <b>Table 4.7</b> of the
15. Junction J1 – Please review the assumed I/G in the calculation.	with consideration of junction J1 in Appendi	evised juncti		alculation sheet of

Comments	Response		
16. Junction J2 – Please review the assumed arm and corresponding street name and flow.	Referring to the junction configuration of J2, the major arm is D'Aguilar Street (SB) right turn to Wellington Street (WB), while the minor arms are D'Aguilar Street (NB) and Wellington Street (WB).		
Section 5.2.2 and Table 5.2:			
17. Please review the dead width for calculating effective width of footpath, since some locations appear to be shopping frontage.	Updated effective width calculation and walkway performance are shown in <b>Table 3.6</b> (with remarks).		
18. The applicant should clarify whether the width of proposed setback at Aberdeen Street is 1m or 1.1m.	The proposed setback is 1m as shown in <b>Figures 2.1</b> $-$ <b>2.3</b> .		
Section 6: 19. Please include the trip generation and attraction of the planned/committed developments.	Please refer to the <b>Table 4.5</b> for the trip generation and attraction of the planned/committed developments.		
Section 6.1.5:  20. Please advise the conversion factor for converting the pcu to vehicle no. for the development and the planned/committed developments considered.	The conversion factor for converting the pcu to vehicle no. for the development and the planned/ committed developments as shown in <b>Table A3</b> below. The number of goods vehicle for development trip generation is assumed to round up to minimum 1 no. for calculations.		
	Table A3 – Conversion Factor for PCU to Vehicle		
	PV/Taxi PCU Factor Goods Vehicle Factor Factor		
	95% 1 5% 2.5 1.075		
Other Detailed Comments (if applicable)*:  21. Section 2.3.3 of TIA - The applicant should clarify whether the width of proposed setback at Aberdeen Street is 1m or 1.1m.	The proposed setback is 1m as shown in <b>Figures 2.1 – 2.3</b> .		

Comments	Response
<ul> <li>22. To create an enjoyable walking environment, the applicant should provide building canopies, including over public footpath(s), setback area and/or right -of-way(s) in accordance with the following where applicable: <ol> <li>Chapter 8 of HKPSG provides for the provision of building canopies (i.e. para. 5.6.11) and for the subject of pedestrian planning be included in development studies and planning applications (para. 5.9.2);</li> <li>Projections over Public Streets stipulated in Lands Administration Office Practice Note 3/2020 (Design, Deposition and Height Clause under Lease); and/or</li> <li>Building Ordinances, in particular Building (Planning) Regulation 10 m Cap 123F regarding balconies and canopies over streets.</li> </ol> </li></ul>	These would be further considered during detailed design stage.
23. Doors of the proposed development should not encroach onto the public roads or the setback area when they are opened.	Noted.
Comments from Chief Building Surveyor, Buildings Department: (Contact Person: Mr Tsz-yeung CHAN; Tel: 2626 1375)  • Proposed site classification should be clarified and justified.	The Site is classified as a Class C site under S18(A) of B(P)R. Please refer to the drawing in <i>Appendix 5</i> for justification.
• Proposed void on M/F and high headroom on 2/F - 3/F are accountable for GFA subject to the submission and justification for consideration.	Noted.

Comments	Response
<ul> <li>All green / amenity features and non-mandatory / non-essential plant rooms and services to be exempted from GFA calculation are subject to the compliance with the relevant requirements, the pre-requisites and the overall cap on GFA concessions stipulated in PNAPs APP- 151 and APP-152.</li> </ul>	Noted.
• The setback of building fronting Wa On Lane which is a street of width not less than 4.5m maintained by Highways Department should be demonstrated in compliance with the requirements under PNAP APP-152.	Noted, relevant sections(s) of PNAP APP-152 will be complied with accordingly. Please also refer to <i>Appendix 5</i> for further illustration.
• Proposed BOH at G/F for a composite building is accountable for GFA.	Noted.
• The enclosing wall of one required staircase at M/F Entrance should be so continued as to separate from another required staircase leading to Kau U Fong in accordance with clause B9.1 of FS Code 2011.	Noted. This shall be further reviewed at detailed design stage.
Comments from Chief Highway Engineer, Highways Department: (Contact Person: Mr Jacky HO; Tel: 2231 5630)	
• It is noted that there are proposed set-back areas within the subject lot at Wellington Street and Aberdeen Street for footpath widening purpose. Comments from LandsD and TD should be sought on the proposed set-back area arrangement.	Noted.
• The set-back areas proposal should be agreed by LandsD, TD and	Noted.

#### (Planning Application No: A/H3/449)

(	Comments	Response
	HyD.	
•	The Lot Owner should be responsible for the design, construction and maintenance of the pavement and associated facilities within the proposed set-back areas.	Noted.
•	The set-back areas should be paved to match the levels of the adjacent public footway.	Noted.

Consolidated by: KTA Planning Limited

Date: 12 March 2024

#### **List of Appendices**

Appendix 1	Revised Landscape Proposal	
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