

Proposed Flat with Shop and Services and Eating Place Uses “Commercial” and area shown as ‘Road’
At 152-164 Wellington Street, Sheung Wan, Hong Kong
S16 Planning Application

(Planning Application No: A/H3/449)

RESPONSE-TO-COMMENT TABLE

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Comments	Response
<p><u>Comments from Environmental Protection Department:</u> (Contact Person: Mr Kelvin CHOI; Tel: 2835 1594)</p> <p><i>Comments received on 5 March 2024</i></p> <p>Comment on Emfac Modeling</p> <p>1. As commented in our email dated 15/02/2024 10:47 (comment 2 and 15), please be reminded that the PATH v3.0 model and the year 2019 WRF meteorological data are released on 31 Jan 2024 and the use of CALINE4 for assessment in Hong Kong has been obsoleted since 31 Jan 2024. Consultant is reminded to review if the assessment would be completed / no further model change by 31 July 2024. Or otherwise, PATH v3.0 and AERMOD for open road emission modelling will need to be adopted in the assessment. Hence, the Consultant is recommended to adopt the PATH v3.0 and AERMOD model for open road assessment for this project in the next round of submission.</p> <p><u>In the PTI Emission Calculation Workbook “PTI Assessment_WEL” (Excel file):</u></p> <p>2. In the worksheets “IdlingEFs”</p> <p style="padding-left: 20px;">i. Please adopt different NO2/NOx Ratio according to the corresponding fuel type for PLB in the calculation of the NOx and NO2 emission factors</p> <p style="padding-left: 20px;">ii. Incorrect NOx cold idling EF is found extracted for Euro III of PLB (LPG). Please check.</p>	<p>This assessment is tentatively planned to be completed by 31/7/2024, thus PATH v3.0 and MET 2019 released on 31/1/2024 have not been adopted. As such, the original capped values for minimum wind speed and mixing height would still be adopted in this assessment.</p> <p>Noted, different NO2/NOx ratio for the corresponding fuel type for PLB has been adopted.</p> <p>NOx cold idling EF for Euro III of PLB (LPG) has been rectified.</p>

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<p>3. In the worksheets for PLB calculation (HKS(PLB) and ES(PLB)):</p> <p>i. Please clarify the year of the PLB population in Remark [2] should be 2028 or 2030 noting that the assessment year should be 2030.</p> <p>ii. Please adopt different (fuel specific) start emission factors according to the corresponding fuel type (diesel / LPG) in the start emission calculation.</p> <p>iii. The calculation of frequency for LPG vehicles for idling emission is found incorrect. Please note that idling of vehicles should be considered as cold idling when soak time is larger than or equal to 4 hours (but there is cold idling with soak time of 1 hour in the calculation).</p>	<p>Noted, the typo has been rectified.</p> <p>Different (fuel specific) start emission factors according to the corresponding fuel type have been adopted.</p> <p>The calculation of frequency for LPG vehicles for idling emission has been rectified.</p>
<p>4. In the worksheets “HKS(PLB)”:</p> <p>i. The calculation of adjusted start emission within bus terminus for LPG vehicles is found incorrect. Please note that the adjusted start emission should not be adjusted by the travelling distance since all emissions would be released within the PTI.</p> <p>ii. Incorrect hot idling emission factors for bypass PLBs are found extracted. Please rectify.</p>	<p>Noted, the typo has been rectified.</p> <p>Different (fuel specific) start emission factors according to the corresponding fuel type have been adopted.</p>
<p><u>In the Report:</u></p> <p>5. Section 4.6.17, the first sentence may not be factually correct. It is observed that there are a number of on-street parking spaces of coaches within the assessment area. Please check.</p>	<p>Noted, section 4.6.17 has been amended.</p>

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<p>6. Section 4.6.17 and 4.6.18</p> <ul style="list-style-type: none"> • Please check whether the Central Government Pier (road side bus terminus) should also be a PTI within the 500 m assessment area apart from the 3 identified PTIs (Central Exchange Square Terminus, Central (Rumsey Street) Terminus, and Hong Kong Station Public Transport Interchange) • Please check whether there is any parking of coaches in the carpark of Macau Ferry Terminal that should be included in the assessment. 	<p>This bus terminus only served for 1 bus route and is located over 300m away from the boundary of the Application Site. Therefore, a broad-brush approach has been adopted for assessing the impact.</p> <p>The impact arisen from the coach parking in the carpark of Shun Tak Centre and Rumsey Street Multi-storey Carpark has been assessed by broad-brush approach as they are located over 300m away from the boundary of the Application Site.</p>
<p>7. Section 4.6.18 and 4.6.22, please clarify the design of Central (Rumsey Street) Terminus noting that there are inconsistencies between Section 4.6.18 and 4.6.22. (Section 4.6.18: all PTIs are enclosed PTI equipped with mechanical ventilation, section 4.6.22: the terminus is an open area PTI)</p>	<p>Noted, sections 4.6.16, 4.6.17 and 4.6.18 have been amended.</p>
<p>8. Section 4.7.12</p> <ul style="list-style-type: none"> • As commented in our email dated 15/02/2024 10:47 (comment 23), it is suggested that 2019 WRF meteorological data shall be adopted for calculating the EMFAC composite emission factors and model runs. • For the current submission, please clarify why Wong Chuk Hang Automatic Weather Station, instead of Hong Kong Park Automatic Weather Station, is used in the assessment, noting that the latter is closer to the project site. Also, the 	<p>This assessment is tentatively planned to be completed by 31/7/2024, thus PATH v3.0 and MET 2019 released on 31/1/2024 have not been adopted.</p> <p>Please be clarified that the data of RH of 1 January 2023 Hour 01 to 6 March 2023 Hour 24 of Hong Kong Park Automatic Weather Station is not available, therefore the data of RH and temperature of Wong Chuk Hang Automatic Weather Station has been adopted in the assessment.</p>

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<p>consultant may consider to update the data from year 2022 to 2023 noting that smaller temperature and RH are observed in year 2023 compared to year 2022 for the Wong Chuk Hang Station and supplement the year of HKO data in this section.</p>	
<p>9. Section 4.7.12, 4.7.14 and 4.7.19, please clarify whether minimum quarterly or minimum monthly temperature and RH profile is adopted noting that there are inconsistencies among these Sections.</p>	<p>Noted, section 4.7.14 and 4.7.19 have been amended.</p>
<p>10. Section 4.7.18 and 4.7.21, suggest revising “<u>duration</u>” to “<u>soak time</u>”.</p>	<p>Noted, section 4.7.18 and 4.7.21 have been amended.</p>
<p>11. Section 4.7.20 formula, please clarify how the vehicle class is “determined for the corresponding road group”.</p>	<p>Noted, section 4.7.20 have been amended by removing “determined for the corresponding road group”.</p>
<p>12. Section 4.7.22 – 4.7.25 and other relevant sections, please use VKT rather than VMT to ensure the consistency of the unit throughout the whole report.</p>	<p>Noted, sections 4.7.22 – 4.7.25 have been amended.</p>
<p>13. Section 4.7.25, suggest to revise “VKT travelled” to “VKT” in all relevant sections.</p>	<p>Noted, section 4.7.25 has been amended.</p>
<p>14. Section 4.7.26 formula, please check whether “starting emission rate” should be revised as “start emission factor”.</p>	<p>Noted, the formula has been reviewed.</p>
<p>15. Section 4.7.27. Suggest to remove "cold" and "rate" in the first sentence and revise as “The hourly total start emission for each road...”</p>	<p>Noted, section 4.7.27 has been amended.</p>

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<p>16. Appendix 4-6, in the Figure for Hong Kong Station Public Light Bus Terminus (Diesel):</p> <ul style="list-style-type: none"> i. Please correct the typo “NFB”. ii. Emission source IDs PTI217 – PTI219 are not shown on the figure. Please supplement. <p>17. Appendix 4-11 PTI Emission Calculation:</p> <ul style="list-style-type: none"> i. Please provide the calculation of idling emission factors in the Appendix. <p>18. Appendix 4-12 Portal Emission Calculation, the calculation of total emission rates of RSP and FSP for Man Cheung Street (WB) are found incorrect. Please rectify and revise the hourly emission rate in Appendix 4-7 and 4-12 accordingly.</p> <p>19. Appendix 4-13 Index Plan:</p> <ul style="list-style-type: none"> i. Road links marked with start emission do not tally with the information provided in Appendix 4-14, e.g. L40A, L41D, L43A, L43B, L44a. Please rectify. ii. Please clarify why the road sections beyond road link L36A of Cleverly Street is not identified as an open road emission source. 	<p>Noted, Appendix 4-6 has been rectified accordingly.</p> <p>Noted, Appendix 4-11 has been rectified.</p> <p>Noted, Appendix 4-12 has been rectified.</p> <p>Noted, the Index Plan has been updated.</p> <p>This is a dead-end road and its road width is narrow. Therefore, very limited vehicles would enter this dead-end road. Moreover, this road is located at ~300m away from the boundary of the Application Site. Therefore, the impact arisen from this road to the ASRs of the Proposed Development should be insignificant and hence this road is not included in the assessment.</p>

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<p>iii. Please clarify whether start emission should be applied to the roads without single yellow and double yellow line, e.g. Wellington Street, Queen’s Road Central and Jubilee Street. Please also note on-street parking spaces are provided at Bonham Strand (Road link L56A) and parking space designated for FEHD vehicles at Jubilee Street (Road link L25B).</p> <p>20. Appendix 4-15, the calculation of daily emission is found incorrect. It is noted that the calculation did not cover emissions from all road links. Please rectify.</p>	<p>Please be clarified that start emission has been applied to those roads. Please refer to the revised Section 4.7.21.</p> <p>Noted, Appendix 4-15 has been rectified.</p>
<p><u>Comments from Environmental Protection Department:</u> (Contact Person: Mr Kelvin CHOI; Tel: 2835 1594)</p> <p><i>Comments received on 18 April 2024</i></p> <p>It was found that the information in air quality chapter of the revised EA is incomplete. All the air modelling files are missing, and some appendices are left blank. With reference to the RtC, the applicant only provides some responses to partially address our previous comments, whilst the rest is left empty or still being prepared. As such, please submit a complete version of air quality chapter of the revised EA before EPD could properly review it.</p> <p>It appears that the applicant / consultant are still using the obsoleted PATH v2.1 model, year 2015 WRF meteorological data, and CALINE4 for vehicular impact assessment. Please note that EPD has already suggested in their previous comments of Feb 2024 to adopt the PATH</p>	<p>The complete version of air quality section has been prepared in the latest version of the revised EA report.</p> <p>Noted.</p>

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<p>v3.0 and AERMOD model for open road assessment for this project. Your attention is drawn to EPD’s comments given in Feb 2024 regarding the adoption of air model / data and you are strongly recommended to adopt the PATH v3.0 and AERMOD model for vehicular emission impact.</p> <p>Please supplement TD’s written endorsement on the traffic forecast to EPD.</p> <p>Please provide adequate information in the submissions to properly address the environmental and sewage concerns raised in the public comments.</p>	<p>Noted. Endorsement from TD on the traffic forecast data will be provided once available.</p> <p>Noted.</p>
<p><u>Comments from Transport Department:</u> (Contact Person: Mr Daniel CHOW; Tel: 2829 5569)</p> <p>The applicant should separately submit temporary traffic management scheme to Police and TD for consideration if public roads and footpaths are affected. Safety measures and temporary traffic arrangement should be provided as necessary in accordance with the “Code of Practice for the Lighting, Signing and Guarding of Road Works” issued by the Highways Department.</p> <p><u>Supporting Planning Statement:</u></p>	<p>Noted.</p>

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<p>Section 3.1.2: TD maintain their view that internal transport facilities should be provided according to the Hong Kong Planning Standards and Guidelines (HKPSG) and that the applicant should review the loading / unloading and parking arrangement for operation of the development and consider necessary measure to minimize the traffic impact to local roads and transport facilities during the construction period. Sound justification should be provide for nil provision of internal transport facilities.</p> <p>Furthermore, in view of the public comments expressing concerns over traffic and transport during construction stage, the applicant should provide relevant assessment for TD’s further consideration. For any works on public roads and footpaths, the applicant should review the design with the aim of minimizing adverse traffic impact.</p>	<p>As described in Section 2.4 of the TIA, the site area of the Application Site is very small (site area = 612 sq.m. only) and it is in an irregular “L” shape. Under this context, the attached Traffic Drawings A1 – A3 of Annex A demonstrate various technical site difficulties to justify the nil provision of internal transport facilities. The relevant text in the Planning Statement is also revised to address this issue.</p> <p>As shown in different options of traffic layout considered in Annex A, the internal transport provision (say minimum 1 no. of LGV loading/unloading bay) and the required minimum manoeuvring spaces would be in serious conflict with a number of internal core structures (structural wall/ columns) or proposed staircases and disabled lift for the public passage within Site. In particular for option 2, the location of run-in/out is also too close to the adjacent junction with Aberdeen Street, which is not acceptable from traffic viewpoint. Thus, it is considered nil provision of internal transport facilities is justified.</p> <p>For the preliminary construction traffic arrangement, please kindly refer to our responses to the item below.</p> <p>The concern of traffic arrangement during construction stage is noted.</p> <p>The preliminary traffic arrangement during demolition/construction stage to minimize the traffic impact on adjacent road network are reviewed below and illustrated in Annex B.</p> <ul style="list-style-type: none"> • During early phase of demolition, a temporary on-street L/UL bay for 7m long LGV shall be required for demolition works as the Application Site is fully occupied by existing old premises. In order

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<p>Section 3.2.1: The applicant proposed setback on 2m and 1m along the site boundary at Wellington Street respectively for public access 24 hours at all time free of charge and without any interruption. Noting that the applicant currently has no intention to surrender the setback areas to the Government and will be responsible for the management and maintenance of the setback areas, the applicant should also check and confirm with relevant departments (such as the Buildings Department and the Lands Department) in writing that the above proposed arrangement of the setback areas will be enforceable.</p>	<p>to minimize the adverse traffic impact on Wellington Street, the proposed temporary on-street L/UL bay would be operated during off-peak hours only. Considering the scale of re-development is very small, the construction traffic volume is expected to be not significant.</p> <ul style="list-style-type: none"> • Sufficient width of carriageway and footpath width would be maintained to facilitate vehicular and pedestrian flow and appropriate TTM would be proposed with reference to the “Code of Practice for the Lighting, Signing and Guarding of Road Works” issued by the Highways Department. • At later demolition stage and construction stage, it is expected sufficient internal temporary manoeuvring space and construction access would be provided for construction vehicle, and the on-street loading / unloading bay would be removed to minimize the traffic impact. <p>Please note that the approval for the captioned S16 Planning Application is scheme-specific in nature and future amendment(s) to the approved scheme shall comply with the Town Planning Board Guidelines for Class A and Class B Amendments to Approved Development Proposals (TPB PG-No. 36C). In particular, Category 13 of the said Guideline states that “Changes in the location and/or reduction in size of the non-building area, setback and/or building gap not initiated by the relevant government department(s)” is a Class B Amendment which will require permission under S16A to be considered by the Director of Planning.</p>

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<p>To enhance the pedestrian environment of Aberdeen Street, the applicant is encouraged to provide more space for footpath at Aberdeen Street as far as practicable for enhancing the walkability. The associated modification to existing public footpaths / steps, the presence of shopfront and the need for erection of pedestrian railings / traffic signs etc. should be taken into account in designing the width of the setback. Horizontal clearances of railings from the edge of carriageway should generally be in accordance with Table 3.5.2.1 in Chapter 3.5 of Volume 2 of the Transport Planning and Design Manual (TPDM).</p> <p>Section 3.2.2: The applicant proposed that the new pedestrian connection (3.3m wide 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 access 24 hours at all time free of charge and without any interruption. The applicant should also check and confirm with relevant departments (such as the Buildings Department and the Lands Department) in writing that the above proposed arrangement of the setback areas will be enforceable.</p> <p><u>Traffic Impact Assessment (TIA)</u></p> <p>Table 5.2: Please review the foot note for walkway ref. P1.</p> <p>Section 6.1.5: Please clarify the reference made to the proportion of PV/taxi and goods vehicle in deriving the conversion factor for converting the pcu to vehicle no.</p>	<p>As shown in TIA Table 5.3, with proposed 1m setback, the pedestrian walkway performance on Aberdeen Street would be greatly improved with satisfactory performance of LOS A in 2033 Design Case. In addition, if considering the proposed staircase and lift connection (between Wellington Street and the sitting out area) within Site, it is expected the pedestrian walkway performance of Aberdeen Street would be further improved. Thus, it is concluded that the proposed 1m setback for Aberdeen Street is sufficient to cater for the pedestrian demand and enhance the walkability.</p> <p>The Applicant is committed to provide a convenient and safe access for the neighbourhood. The public access and the opening hours will be included into the DMC of the future residential development.</p> <p>The foot note for walkway ref. P1 in Table 5.2 has been revised.</p> <p>Please kindly note that the conversion of pcu to vehicle number for the background traffic flows has adopted the composition of vehicle breakdown in the surveyed traffic data of road links.</p>

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<p>Appendix C: Please review the road profile e.g. road type assumed.</p>	<p>The assumptions of proportion of PV/taxi and goods vehicle in deriving the conversion factors of pcu to vehicle for the proposed development and the planned developments have taken into account the results of in-house trip generation survey results as shown in Table 1 below:</p> <p>Table 1 – In-house Trip Generation Survey Results (Goods Vehicle proportion)</p> <table border="1" style="margin-left: auto; margin-right: auto;"> <thead> <tr> <th style="text-align: left;">Development</th> <th style="text-align: left;">Usage</th> <th style="text-align: center;">Peak-hour Goods Vehicle Percentage (%)</th> </tr> </thead> <tbody> <tr> <td>Garden Rivera (Shatin)</td> <td>Residential</td> <td style="text-align: center;">4.4%</td> </tr> <tr> <td>Lee Garden One (Causeway Bay)</td> <td>Commercial</td> <td style="text-align: center;">3.3%</td> </tr> </tbody> </table> <p>Hence 5% Good vehicle is assumed for the proportion of goods vehicle.</p> <p>Please find the revised road profile in Appendix II.</p> <p>Road types in Annual Traffic Census (ATC) by TD have been referred to as far as practicable. For those road sections which are not identified in ATC and public domain, road types are assumed based on the road hierarchy of adjacent roads and relevant definitions in HKPSG.</p>	Development	Usage	Peak-hour Goods Vehicle Percentage (%)	Garden Rivera (Shatin)	Residential	4.4%	Lee Garden One (Causeway Bay)	Commercial	3.3%
Development	Usage	Peak-hour Goods Vehicle Percentage (%)								
Garden Rivera (Shatin)	Residential	4.4%								
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<p><u>Comments from Central and Western District Leisure Services Office:</u> (Contact Person: Ms Kay CHAN; Tel: 2853 2569)</p> <p>It is noted that Wa On Lane Sitting-out Area, a public open space under LCSD's management located immediate south to the site, will be affected by the proposal.</p> <p>Besides the 4 trees proposed to be felled, from the information provided, it is anticipated that closure, demolition and alternation of other park facilities would also be required to facilitate the site formation and the proposed new park entrance.</p> <p>Unless detail proposal such as estimated duration and area to be closed, facilities to be demolished and compensatory plan is provided, LCSD could not provide further comment at this stage.</p> <p>If joint site meeting is preferred, please contact our Ms. Kay CHAN at 2853 2569 (Email: adlmcw3@lcsd.gov.hk).</p>	<p>The Applicant is well aware that the proposed development would affect a small portion of Wa On Lane Sitting-out Area. Upon approval of the S16 Planning Application, the Applicant will continue to liaise with LCSD to identify items that will be affected and how to reinstate. The Applicant will be responsible for the reinstatement to the satisfaction of LCSD.</p>

Consolidated by: **KTA Planning Limited**

Date: **13 May 2024**

List of Appendices

Appendix I Revised Environmental Assessment

Appendix II Revised Pages of the Traffic Impact Assessment

Appendix III Replacement Page of the Supporting Planning Statement