

**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><b><u>Comments from Transport Department:</u></b><br/><b>(Contact Person: Ms Alice LUK; Tel: 2829 5569)</b></p> <p>The Applicant provided further information to support the proposed nil provision of internal transport facilities within the Application Site. However, with reference to Dwg. No. SK-RW-01 in Appendix I of the Response-to-Comment (R-to-C) Table, it indicates that there is room for providing internal transport facilities such as loading/unloading bay for light goods vehicle with the aids of turntable. In view of the foreseeable operation (e.g. refuse collection, delivery of goods etc.) of the development, the Applicant should critically review and consider the provision of internal transport facilities with the Application Site, given that there is no-stopping restriction along the frontage of the development and the footpath along Wellington Street is too narrow for material delivery.</p> | <p>Firstly, as mentioned in Section 2.4 of the submitted TIA, and R-to-C for Further Information (FI) submission dated 12<sup>th</sup> March 2024, the Application Site falls within Commercial zone in “the SOHO and its immediate adjoining area (Plan 1)” in the Approved Sai Ying Pun and Sheung Wan OZP No. S/H3/34 (“Approved OZP”) and has a site area of 612m<sup>2</sup> (i.e. only about two-third of 900m<sup>2</sup>). In terms of both location and site area, the Site fully complies with the requirements as stated in para. 8.1.6 of the Explanatory Statement attached to the Approved OZP, which states the following:</p> <p><i>“In view of the character of the SOHO and its immediate adjoining area (Plan 1) and the existing <b>narrow streets and footpaths</b> there <b>causing vehicular/pedestrian conflicts</b>, development/redevelopment in the area are to be kept as low as possible and <b>vehicular traffic should be minimized</b>. Given the improved accessibility offered by the Central-Mid-levels Escalator, close proximity of the area to the MTR station and the availability of various kinds of public transport facilities, the planning objective is to <b>maintain this area as a pedestrian oriented area and vehicular traffic should be discouraged</b>. <u><b>For sites smaller than 900m<sup>2</sup> in the area, on-site car parking and loading/unloading requirements will be waived</b></u> and the building height restriction is more stringent.”</i></p> <p>The nil car parking and loading/unloading provision does not only relate to the traffic impact at the short section of Wellington Street abutting the Site, but it is also related to vehicular and pedestrian safety as well as the</p> |

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|---|---|-----------------------------|--------------------|-----------------------------|--------------------|---|--|--|--|----------------------------------|---|---|-----|
|   | <p>implementation of the planning objective to “<i>maintain this area as a pedestrian oriented area</i>” and discourage vehicular traffic.</p> <p>Notwithstanding the above, waiving car parking and loading/unloading provision in this application would not set an undesirable precedent. The Site has obtained a GBP approval for a commercial redevelopment with nil provision of loading/unloading facilities in May 2023. The paragraph below is going to demonstrate that the nil provision under the current Proposed Development Scheme for the composite residential and retail use is even better off than the approved commercial scheme in terms of traffic impact.</p> <p>Based on HKPSG, the required loading/unloading facilities for the proposed composite residential and retail use (i.e. 2 L/U bays) is lower than that for commercial use (i.e. 6 L/U bays) as shown in <b>Table 1</b> below:</p> <p><b>Table 1 – Comparison of Loading/Unloading Requirements in HKPSG between the Approved Commercial Scheme and the Proposed Composite Residential and Retail Development at the Subject Site</b></p> <table border="1" style="width: 100%; border-collapse: collapse;"> <thead> <tr> <th style="text-align: center;">Use / GFA</th> <th style="text-align: center;">HKPSG Standard</th> <th style="text-align: center;">HKPSG Requirement (Low End)</th> <th style="text-align: center;">Proposed Provision</th> </tr> </thead> <tbody> <tr> <td colspan="4"><b>Approved GBP for Commercial Scheme</b></td> </tr> <tr> <td>Office (6,595m<sup>2</sup> GFA)</td> <td>1 loading/unloading bay for goods vehicles for every 2000 to 3000</td> <td style="text-align: center;">3</td> <td style="text-align: center;">Nil</td> </tr> </tbody> </table> | Use / GFA                   | HKPSG Standard     | HKPSG Requirement (Low End) | Proposed Provision | <b>Approved GBP for Commercial Scheme</b> |  |  |  | Office (6,595m <sup>2</sup> GFA) | 1 loading/unloading bay for goods vehicles for every 2000 to 3000 | 3 | Nil |
| Use / GFA                                 | HKPSG Standard  | HKPSG Requirement (Low End) | Proposed Provision |                             |                    |   |  |  |  |                                  |   |   |     |
| <b>Approved GBP for Commercial Scheme</b> |   |                             |                    |                             |                    |   |  |  |  |                                  |   |   |     |
| Office (6,595m <sup>2</sup> GFA)          | 1 loading/unloading bay for goods vehicles for every 2000 to 3000   | 3                           | Nil                |                             |                    |   |  |  |  |                                  |   |   |     |

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|          |  | sqm, GFA  |   |            |
|          | Retail<br>(2,613m <sup>2</sup> GFA)  | 1 loading/unloading bay for goods vehicles for every 800 to 1200 sqm, GFA   | 3   |            |
|          | <b>Total 9,208m<sup>2</sup> GFA</b>  | <b>Total</b>  | <b>6</b>  |            |
|          | <b><u>Current Proposed Composite Residential and Retail Building under this S16 Planning Application</u></b>   |   |   |            |
|          | Residential<br>(175 units / single block)  | Minimum of 1 loading/unloading bay for goods vehicles within the site for every 800 flats or part thereof, subject to a minimum of 1 bay for each housing block | 1 (small residential tower which would be share-used with retail) | <b>Nil</b> |
|          | Retail<br>(826m <sup>2</sup> GFA)  | 1 loading/unloading bay for goods vehicles for every 800 to 1200 sqm, GFA   | 1   |            |
|          | <b>Total</b>   |   | <b>2</b>  |            |
|          | <p>In general, the loading/unloading demand for the proposed composite residential and retail development under this Application would be lower than that for commercial development. Loading/unloading activities for residential use will be very limited and occasional as compared with that for commercial (office + retail) use. Moreover, the Proposed Development Scheme has already incorporated a 2m setback along</p> |   |   |            |

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|          | <p>Wellington Street to widen the existing footpath from 1.5m to 3.5m (subject to on-site measurement at later detail design stage), the issue on “<i>the footpath along Wellington Street is too narrow for material delivery</i>” should have been resolved.</p> <p>In light of all the above, the nil loading/unloading provision for the proposed residential development is considered acceptable and justified.</p> |

Consolidated by: **KTA Planning Limited**

Date: **9 September 2024**