

Planning Application Ref. No.: TPB/A/K10/271
Our Ref. (04) C2307-1453-MA

17 June 2024

香港金鐘道 88 號
太古廣場一期 27 樓
電話 852 2820 2800 傳真 852 2810 0830**Town Planning Board**
15/F, North Point Government Offices
333 Java Road, North Point, Hong Kongwww.cbre.com.hk
地產代理 (公司) 牌照號碼
Estate Agent's License (Co.) No. C-004065For the attention of: Town Planning Board Secretariat**By Email**
(tpbpd@pland.gov.hk)

Dear Sir/Madam,

Re: Request for Deferment of S.16 Application – G/F, Brill Plaza, 84 To Kwa Wan Road, Kowloon

Pursuant to our Section 16 application for the property at Ground Floor, Brill Plaza, 84 To Kwa Wan Road, Kowloon, we hereby attach and make submission of the full report of Traffic Impact Assessment in response to the additional comments from Transport Department, in order to complete our application process. Kindly note and thank you so much.

Should you have any queries, please do not hesitate to contact the undersigned at [REDACTED].

Yours faithfully,
CBRE Advisory Hong Kong LimitedChester Leung
Senior Director – Valuation and Advisory Services
cc. Client – By Email only

Proposed Shop and Services at G/F of Brill Plaza, 84 To Kwa Wan Road, Ma Tau Kok – Traffic Review

(A) Background

Brill Plaza is an industrial building located at 84 To Kwa Wan Road in Ma Tau Kok, and the Applicant has the intention to convert part of G/F from “Industrial” to “Shop and Services”. The location of Brill Plaza and proposed “Shop and Services” is shown in Figure 101.

The captioned site is zoned “Residential (Group E)” under the Approved Ma Tau Kok Outline Zoning Plan No. S/K10/30. As per “Schedule II: for existing industrial or industrial-office building”, “Shop and Services (Motor-vehicle Showroom on ground floor, Service Trades only)” are under “Column 1” use of the OZP, while “Shop and Services (not elsewhere specified)” are under “Column 2” use.

The Gross Floor Area of the proposed “Shop and Services” on G/F is around 4,436ft², or equivalent to around 412.118m².

Against this background, CKM Asia Limited, a traffic and transportation planning consultancy firm, was commissioned by the Applicant to conduct a Traffic Review for the Proposed Shop and Services. This Traffic Review presents the work undertaken to address the concern of Transport Department.

(B) Nature and Customer Group

Based on the size and location of the proposed “Shop and Services” on G/F, the potential tenants are expected to be shops which will **serve the local community needs**, e.g. fast food outlet, convenience store (say JHC, Best Mart 360), bank or supermarket. Hence, **these shops are unlikely to attract tourist groups**, but the local residents living nearby will walk but not drive there.

The Letter of Undertaking from the Applicant is enclosed for your information.

(C) Comparison of Traffic Generation

The premise on G/F was previously occupied by the HKPost Kowloon City Delivery Office until late-2023. According to the management office of Brill Plaza, the mail delivery office generated over 10 veh/hr (one-way) during the office hours, and these include the collection of sorted mail from Central Mail Centre.

Taking into consideration the nature and target customers of the proposed “Shop and Services”, the mean values of the trip generation rates for retail found in Volume 1 of the Transport Planning and Design Manual (TPDM) are adopted to estimate the associated traffic generation.

The comparison of traffic generation for the previous Kowloon City Delivery Office and the proposed “Shop and Services” is presented in Table 1.

TABLE 1 COMPARISON OF TRAFFIC GENERATION

Item	Trip Generation Rate (pcu/hr/100m ²)				Traffic Generation (pcu/hr)					
	AM Peak		PM Peak		AM Peak			PM Peak		
	IN	OUT	IN	OUT	IN	OUT	2-way	IN	OUT	2-way
Kowloon City Delivery Office ⁽¹⁾					10	10	20	10	10	20
Proposed "Shop and Services"	0.2434	0.2296	0.3563	0.3100	1.0	0.9	1.9	1.5	1.3	2.8
Difference					-9.0 (-90%)	-9.1 (-91%)	-18.1 (-91%)	-8.5 (-85%)	-8.7 (-87%)	-17.2 (-86%)

Note: ⁽¹⁾ To err on the high side, pcu factor of 1 is assumed

Table 1 shows that the proposed "Shop and Services" is expected to generate **18.1 and 17.2 pcu (2-way) less than** the Kowloon City Delivery Office during the AM and PM peak hours, or equivalent to **91% and 86% less traffic**.

With the reduction in traffic generation, the proposed "Shop and Services" will result in **no** adverse traffic impact to the surrounding road network.

(D) Adequacy of Internal Transport Facilities

At present, the Brill Plaza car park has 26 car parking spaces and 10 loading / unloading bays. In order to understand the occupancy of the car park, occupancy surveys were conducted from 0800 – 1900 hours on 14th May 2024 (Tuesday), which cover the busiest operating hours of the Brill Plaza. The survey results are summarised in Table 2.

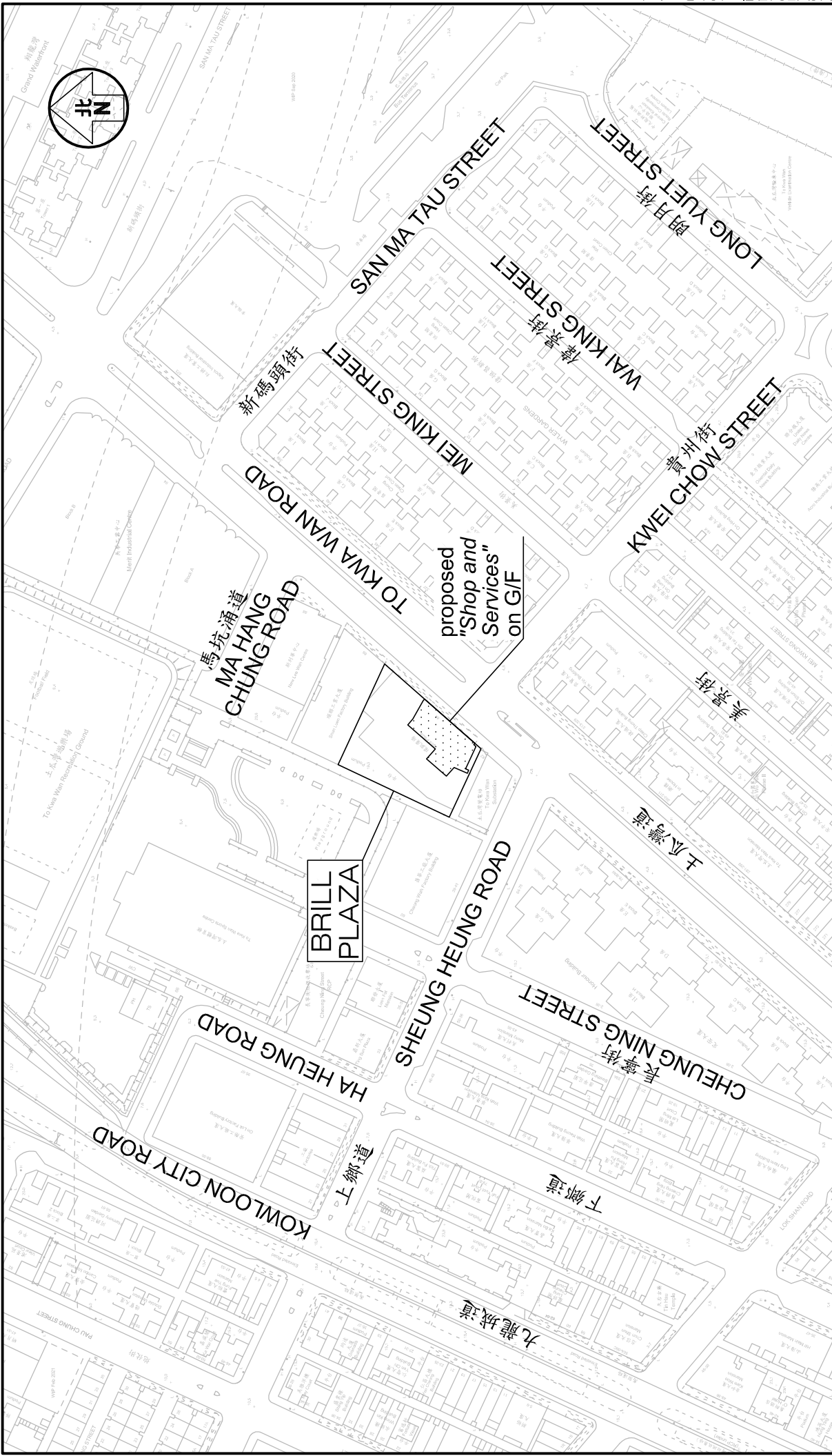
TABLE 2 OCCUPANCY OF BRILL PLAZA CAR PARK

Time Period (hours)	Car Parking Space		Loading / Unloading Bay	
	Maximum No. of Space Occupied	Maximum Occupancy	Maximum No. of Space Occupied	Maximum Occupancy
0800 – 0900	15	58%	6	60%
0900 – 1000	15	58%	4	40%
1000 – 1100	19	73%	3	30%
1100 – 1200	21	81%	2	20%
1200 – 1300	20	77%	4	40%
1300 – 1400	20	77%	2	20%
1400 – 1500	21	81%	4	40%
1500 – 1600	22	85%	6	60%
1600 – 1700	21	81%	3	30%
1700 – 1800	19	73%	2	20%
1800 – 1900	17	65%	2	20%
Maximum	22	85%	6	60%

Table 2 shows the following:

- The maximum occupancy of the car park is 85%, i.e. with 4 vacant spaces; and
- The maximum occupancy of the loading / unloading bays is 60%, i.e. with 4 vacant bays.

In view that both the car parking spaces and the loading / unloading bays in the Brill Plaza are not fully utilised, the additional vehicle trips generated by the proposed "Shop and Services" could use the available car park spaces and loading / unloading bays.



Project Title	PROPOSED SHOP AND SERVICES ON G/F OF BRILL PLAZA, 84 TO KWA WAN ROAD, KOWLOON (A/K10/271)		Figure No.	101	Revision	A
	Figure Title		Designed by	T H C	Checked by	K C
		Scale in A4		1 : 2,000	Date	13 JUN 2024
		CKM Asia Limited		Traffic and Transportation Planning Consultants		
		21st Floor, Methodist House, 36 Hennessy Road, Wan Chai, Hong Kong		Tel : (852) 2520 5990 Fax : (852) 2528 6343		
		Email : mail@ckmasia.com.hk				

LOCATION OF BRILL PLAZA

**Letter of Undertaking
from the Applicant**

TSI MAI COMPANY LIMITED

45/F, Sun Hung Kai Centre, 30 Harbour Road, Hong Kong

31st May 2024

Transport Department
Urban Regional Office
Traffic Engineering (Kln) Division
8/F, Mongkok Government Offices
30 Luen Wan Street
Mong Kok, Kowloon

Attn: Mr WONG Chun (Engr / Hung Hom)

Dear Mr Wong,

**Proposed Shop and Services at G/F of Brill Plaza,
84 To Kwa Wan Road, Ma Tau Kok (TPB No. A/K10/271)**

Letter of Undertaking

We are the Owner of Brill Plaza and we would like to offer the following undertaking for the captioned planning application:

The proposed "Shop and Services" on G/F of Brill Plaza will not be rented to the tenants / operators who serve tourist groups and customers arriving by tour buses.

Should you have any queries, please do not hesitate to contact the undersigned.

Thank you for your attention.

Yours sincerely,

Yours faithfully,
For and on behalf of
TSI MAI COMPANY LIMITED



Lo King Wai