

Other Technical Comments from the Government Departments

1. Comments of the Project Manager (East), Civil Engineering and Development Department
 - (a) Structures of the Tunnel of Trunk Road T2 should not be adversely affected by the proposed development. This Office and relevant maintenance and management departments including Transport Department and Highways Department should be consulted when conducting the design with comprehensive assessment to clearly demonstrate the Tunnel would not be adversely affected. The assessment should include but not limited to the proposed buildings/structures above the Tunnel and the high rise buildings/structures influencing the structures of the Tunnel.
 - (b) Assessments of the impact to the Tunnel, analysis of quality and jointing of the rock mass within the site, design, programme and method of construction, etc, should be submitted to this Office and the relevant departments for agreements when conducting the design.
 - (c) If there is overlapping in the construction period, the proposed development should coordinate with this Office on the temporary works, construction sequence, working space and construction programme, etc. to avoid clash and conflicts.
 - (d) It is noted that one more level of basement car park with updated layout was proposed in this revised submission as shown in Appendix M of **Appendix Ib**. The impacts of this revised layout on the Cha Kwo Ling Tunnel should be reflected in other parts of the submission in particular the Revised Geotechnical Planning Review Report

2. Comments of the Commissioner for Transport

TD's further comments on the FI (at **Appendix Ib**) using the same numbering are as follows

Item	TD's further comments on the Applicant's Responses to Comment
1(a)	In addition to the level of service on the footpaths, please also assess the walking distance to and from the nearest MTR Station. Is there any pedestrian connection to the Bus-bus Interchange of Eastern Harbour Crossing?
2(a)	<p>(i) It is noted the AOI has excluded 5 junctions within Kwun Tong Business Area (KTBA). However, it is anticipated that the development flows would enter / leave the Kwun Tong Business Area, especially through the major intersection at Hoi Yuen Road / Kwun Tong Road Roundabout. Unless with solid justifications, it is required to include the junction nos. (iv) to (vii) and (ix) in the AOI, namely</p> <p style="margin-left: 20px;">Junction (iv) Hoi Yuen Road/Kwun Tong Road Roundabout Junction (v) Hoi Yuen Road/Shing Yip Street/How Ming Street Junction (vi) Hoi Yuen Road/Hung To Road Junction (vii) Hoi Yuen Road/Wai Yip Street Roundabout Junction (ix) Kwun Tong Road/Tsui Ping Road</p> <p>(ii) For Lei Yue Mun Road / Slip Road to EHC and Lei Yue Mun Road / Kai Tin Road, please advise the improvement measures by others. In addition to the improvement measures by others, please also assess if the junctions still operate</p>

Item	TD's further comments on the Applicant's Responses to Comment
	<p>at capacities with the subject development. If negative, please propose further improvement works as necessary.</p> <p>(iii) Please also include the construction traffic impact assessment.</p>
2(b)	Please detail the assumptions and reference made for the adjustment factor of 1.15 applied to the existing traffic flows.
2(c)	As the trip pattern and peak traffic hours are different for kindergarten and retail use, it is not appropriate to assume retail trip rates for kindergarten. Please review.
2(h)	Please provide sketch(es) showing the directional split percentage for different destinations for consideration.
2(k)	<p>(i) The walking distance and time for pedestrians from the subject development to the nearest Lam Tin MTR Station are about 2km and 30 minutes respectively. It remains doubtful on the assumptions that 37.3% of pedestrians induced by the subject development would use the railway services. The accessibility between the MTR Station and the subject development should be thoroughly assessed.</p> <p>(ii) The details of the feeder service, location of the lay-by at Cha Kwo Ling Road, additional trip generated from the feeder services were absent in the response. Please also provide the routings of the feeder service and assess their carrying capacity.</p>

Item	TD's further comments on the Revised TIA at Appendix Ib
Table R5	<p>(a) For the in-house trip rates of training centre (which would be adopted for estimating the traffic generated from the future VTC), please provide the details on the reference and assumptions on the trip rates. Is it made with reference to trip generation survey of existing buildings with similar scale, nature and geographical location? If so, please name the building and date of survey for consideration.</p> <p>(b) According to the latest TIA report of the VTC campus re-development project, the number of trainees is not 6,000. Please check with VTC for the latest planning parameters for the assessment.</p>
Table R6	<p>(a) Please advise the source of the pedestrian trip rates for both the residential and retail uses.</p> <p>(b) Please advise the directional split of the pedestrian to and from the subject developments. Please also state all the relevant assumptions.</p>
Table 4.1	<p>(a) Please advise the trip rate of the kindergarten.</p> <p>(b) For the in-house trip rates of elderly services and child care centre, please provide the details on the reference and assumptions on the trip rates. Is it made reference to trip generation survey with similar scale, nature and geographical location? If so, please name the building and date of survey for consideration.</p>

Table 4.4	<p>(a) In addition to our further comments on the RtC in item 2(a)(i) above, please also include Lei Yue Mun Road / Yau Tong Road in the junction assessment.</p> <p>(b) Based on the TTIA report (Table 4.4 of Appendix L in FI), a number of junctions would be overloaded in year 2032 design scenario with unacceptable forecast reserve capacity and appropriate traffic improvement measures shall be identified and implemented under the project to mitigate the situation. However, no junction improvement schemes were proposed at the above junctions, except for junctions at Wai Yip Street/Wai Fat Street (J1), Wai Fat Road/Cha Kwo Ling Road (J2), and Cha Kwo Ling Road/Yau Tong Road (J6). Even with junction improvements, the reserve capacity at J1, J2 and J6 are still not acceptable.</p>									
Table 5.1	<p>(a) Under the new parking standards for subsidized housing, the GPS is “1 space per 4-7 units” instead of “1 spaces per 6-9 units”. Please revise the calculation.</p> <p>(b) Please also advise the parking provision for kindergarten, elderly services and child care centre.</p> <p>(c) Please advise the rationale of the parking provision for G/IC.</p> <p>(d) Please note the loading / unloading spaces under the new parking standards for subsidized housing below:</p> <table border="1" data-bbox="347 1039 1358 1339"> <thead> <tr> <th data-bbox="355 1039 890 1115">Shared-use Vehicle Type</th> <th data-bbox="898 1039 1142 1115">Parking Space Dimension</th> <th data-bbox="1150 1039 1350 1115">Provision</th> </tr> </thead> <tbody> <tr> <td data-bbox="355 1115 890 1191">Non-van-type Light Goods Vehicle and Private Light Bus</td> <td data-bbox="898 1115 1142 1191">8m (L) x 3.5m (W) x 3.6m (H)</td> <td data-bbox="1150 1115 1350 1191">1 space per 260 flats</td> </tr> <tr> <td data-bbox="355 1191 890 1339">Medium / Heavy Goods Vehicles and Coach</td> <td data-bbox="898 1191 1142 1339">12m (L) x 3.5m (W) x 4.7m (H)</td> <td data-bbox="1150 1191 1350 1339">2 L/UL bays per block for overnight parking</td> </tr> </tbody> </table> <p>(e) According to the latest parking policy, please also provide public parking spaces in the G/IC sites.</p>	Shared-use Vehicle Type	Parking Space Dimension	Provision	Non-van-type Light Goods Vehicle and Private Light Bus	8m (L) x 3.5m (W) x 3.6m (H)	1 space per 260 flats	Medium / Heavy Goods Vehicles and Coach	12m (L) x 3.5m (W) x 4.7m (H)	2 L/UL bays per block for overnight parking
Shared-use Vehicle Type	Parking Space Dimension	Provision								
Non-van-type Light Goods Vehicle and Private Light Bus	8m (L) x 3.5m (W) x 3.6m (H)	1 space per 260 flats								
Medium / Heavy Goods Vehicles and Coach	12m (L) x 3.5m (W) x 4.7m (H)	2 L/UL bays per block for overnight parking								

3. Comments of the Director of Environmental Protection

Noise Impact Assessment

(a) Section 2.3.3

- TD's endorsement on road traffic data should be included.

(b) Appendix 2

- The flow in model of "SCH&RCHE" is not consistent with that in Appendix 2, including road sections B5 and B7.

- Appendix 3

- The information in Figure 5b is not consistent with Appendix 3, for example, Figure 5b

shows that NSR T2-40 & T2-41 would be fitted with Acoustic Window which is not consistent with Appendix 3 where no measure was proposed. NSRs T2-52 & T2-53 have similar problem.

- The predicted noise level of NSR T-4-69 at 9/F is marked as "0". Please check.
- The 1st floor level of T6 is marked as 13mPD, which is not consistent with the drawings in Appendix 1 which show 15.5mPD.

(c) Appendix 9

- The Sound Power Level of Cha Kwo Ling Road Substation used in the fixed noise impact assessment in Appendix 9 is 66dB(A). However, according to Appendix 8, the derived sound power level should be 74.3dB(A). Please rectify.

4. Comments of the Chief Town Planner/Urban Design and Landscape, Planning Department:

Visual Impact Assessment (VIA)

- (a) For VP-H, the conclusion that “visual impact brought by the proposed buildings to these public viewers...would be **significant to moderately adverse in the long run**” in para. 4.4 does not tally with the description in para. 5.6.
- (b) The applicant may wish to update Table 3.9 in the previously submitted planning statement to tally with the revised VIA.

Air Ventilation Assessment (AVA)

- (a) The consultant is obliged that all the major noise barriers, elevated structures, planned and committed developments near the Site would be included in the assessment; and the existing developments and their building heights should be accurately reflected in the assessment.
- (b) It is mentioned in the Response-to-comment (R-to-C) at **Appendix Ib** that an extra 60m wide view and ventilation corridor could create a breezeway to further enhance the view and permeability. However, there is no discussion of such measure in the AVA report. For easy reference, it is suggested to mark the “60m wide view and ventilation corridor” on the plan.
- (c) There are some minor observations as follows:
 - i. Para. 1.5.1 – The “7 residential towers erected at grade with **28-41 storeys**” does not match with Table 3.4 in the submitted planning statement.
 - ii. Para. 3.3.3 & Fig. 7 – The “36m building separation between Day Care Centre & Elderly Home and Tower T3” as mentioned in Line 2 does not match with the measurement in Figure 7. ”.

Landscape Planning Aspects:

- (a) With reference to Figure 6.1 “Blow-up Section – Tree Treatment on FM1”, the proposed retaining wall will encroach into a considerable portion of Tree Protection Zone of the retained mature tree (FM1) on slope, which may affect the health condition and stability of the retained tree. The Applicant should review the alignment of the proposed retaining wall to preserve the root system within the dripline area for the tree.

- (b) At-grade tree planting on G/F along the EVA near the primary school and at the proposed hard paved area next to Tower 3 should be further explored to enhance the landscape quality of the development.

5. Comments of the Director of Agriculture, Fisheries & Conservation

Ecological Assessment

- (a) Para. 2.2.2 & 2.2.3 and Figure 1 - Survey transects mentioned in the above paragraphs are not shown in Figure 1.
- (b) Section 5 – Evaluation of impact on *Gnetum luofuense*, which is a floral species of conservation importance, recorded close to the Application Site based on Figure 1 should be provided. Should this plant species be affected, mitigation/protective measure should be proposed, as appropriate.

6. Comments of the Executive Secretary (Antiquities and Monuments), Antiquities and Monuments Office

Law Mansion (Grade 3 Building)

- (a) In respect of the applicant's response to AMO's comments as set out in (a) to (d) in the FI, which inter alia mentioned that the implementation agent of the public housing development (the Hong Kong Housing Authority (HKHA) as mentioned by the applicant) is expected to carry out the Heritage Impact Assessment ("HIA") for the two graded buildings, structural survey and investigation for the adaptive re-use of Law Mansion. Given the proposed housing development is initiated by private entities which should be considered as a private housing development project, the HIA mechanism does not apply. Specifically, according to Development Bureau Technical Circular (Works) No. 6/2009 on Heritage Impact Assessment mechanism for Capital Works Projects, the HIA mechanism only applies to capital works projects. Besides, HIA is usually conducted by works departments while HKHA is not an appropriate agent to conduct the HIA. If the two graded buildings are planned to preserve in a private development, the project proponent is expected to engage a heritage consultant to assess the potential impacts, both physical and visual, arising from the proposed development on the two graded buildings and formulate appropriate protective, monitoring and mitigation measures, to be agreed by AMO.
- (b) The applicant is required to provide a detailed assessment on the potential impact(s) arising from the proposed conversion of Law Mansion from a residential block into Law Mansion Community Library; appropriate protective, monitoring and mitigation measures for safeguarding the Law Mansion should also be formulated for AMO's consideration.
- (c) Any proposed works should not affect the structural stability and integrity of Law Mansion, including its foundation. Thus, the applicant is advised to conduct a survey on the structural conditions of Law Mansion to facilitate the future adaptive re-use of Law Mansion and works to be involved.

- (d) It is noted from the submission that the Law Mansion is a “Private Building Lot Partially Held by Applicant and Partially by Others”, as such, the applicant is strongly advised to engage all stakeholder(s) of the Law Mansion concerned, i.e. owner(s), tenant(s), occupier(s) etc. at the early stage for the preservation proposal. The management and maintenance party/ agent of the proposed community library should also be identified in the conservation proposal.

CKL Tin Hau Temple (Grade 3 Building)

- (e) It is noted that CKL Tin Hau Temple will be preserved in-situ. In order to safeguard the structural stability of the Tin Hau Temple, please assess the potential impact(s) arising from the proposed development on the Tin Hau Temple, i.e. decanting block T1 in the surrounding area of the graded building and formulate appropriate protective, monitoring and/or mitigation measure(s) accordingly to safeguard the Tin Hau Temple for AMO’s consideration.

Others

- (f) The Site will be raised to a site level of +5.5mPD to cope with potential flooding and rise in water level due to climate change. Please assess and advise the potential impact(s) of the proposed site levelling works on the two Graded Buildings and propose appropriate protective, monitoring and mitigation measures to safeguard the two Graded Buildings for consideration.
- (g) The legend and labels for the two graded buildings should be provided in Figure 2.1 of Appendix I of FI: Revised Heritage Appraisal of Cha Kwo Ling Tsuen for the sake of accuracy and clarity.

7. Comments of the Chief Engineer/Mainland South, Drainage Services Department

Sewerage Impact Assessment (SIA)

- (a) Appendices A and B – Please review if the discharge of backwash water from the swimming pool of Laguna City should be taken into account.
- (b) Appendices A and B – Please review the unit flow factor adopted for “Ventilation Structure” in Catchment C1.
- (c) Appendices A and B – Please justify with appropriate substantiation for the assumed flow distribution from Building Group KW0164 (Catchment C3A and C3B) as 50% to manhole FMH4031662 and 50% to manhole FMH4050066 respectively.

Drainage Impact Assessment (DIA)

- (d) R-to-C table, Item 1 – The adoption of runoff coefficient of 0.2 in the proposed scenario is on the relatively low side, even for the first 2 types of planting arrangements (trees & retained trees and shrubs) where the minimum soil depth is 1200mm and 600mm respectively. For extreme weather events such as a 50-year return period storm, the water retention available for 1m soil depth is exhausted quickly particularly if the underlying layer is less permeable leading to low infiltration such as is commonly the case for artificial areas (versus natural terrain). Based on local experience, such runoff coefficient is relatively low. In addition,

the assessment revealed that some parts of the drainage system have insufficient freeboard and some will flood under the future scenario, such a small change in the runoff coefficient from say 0.2 to 0.25 may have significant effect on the results. As such, please review the runoff coefficient. Full justification should be provided for the adopted parameter with analysis on the ground conditions, permeability, slope, retention characteristics of soil etc.

- (e) R-to-C table, Item 2 and Appendix F – Based on the results of the hydraulic assessment, it is noted that there are some small increase in water level due to the development, and there are some locations where there will be a flood depth of a few hundred mm under the future scenario.
- (f) To relieve the increasing pressure on the drainage system due to development and ensure sustainable development in Hong Kong in face of climate change, provision of blue-green drainage infrastructure according to Section 3.2.2 of DSD's Stormwater Drainage Manual and DevB TC(W) No. 9/2020 is strongly encouraged to be incorporated in the development with a view to reducing the quantity as well as improving the quality of site runoff. The project proponent should actively consider the incorporation of Blue-Green Elements and the principle of “single site, multiple uses” in DIA and project design for enhancing the adaptive capacity of the drainage system and other associated beneficial uses. In fact, similar concept is already embraced in the stormwater management section of BEAM Plus Neighborhood in which credits will be granted for promotion of infiltration and provision of temporary storage. Please consider adopting blue-green infrastructure in the development to help mitigate flood risk
- (g) It is noted that some parts of the development have a ground level of +4.0. As the 50-year return period sea level in end-21st century would be at almost the same level, please review if any changes may be necessary to increase flood resilience within the development.
- (h) R-to-C Table, Items 5 and 6 - He reserves comments on the drainage assessment until after further details of the upstream drainage system and the connection details are provided in later stages of the project.
- (i) R-to-C table, Item 7 – Please note that SDM Section 9.3 refers to a 10% reduction in flow area.

8. Comments of the Secretary for Education

A proper and suitable run-in-out from the public road to the proposed school site is required to be provided. In addition, sufficient site area shall be provided to accommodate the essential drop off area and parking spaces for school bus and private cars.

9. Chief Building Surveyor/Kowloon, BD (CBS/K, BD)

- (a) In the FI of Illustrations on Building Separation Compliance in **Appendix Ib**, assuming the proposed roads within Site is not a public street as described under Building (Planning)

Regulation 18A(3)(a)(i) & (ii), the building separation requirement shall apply to the whole site, taking into account of the buildings.

- (b) A continuous projected facade length (L_p) shall be calculated in conjunction with the adjoining retail building.
- (c) Detailed comments under the Building Ordinance can only be formulated at the building plan submission stage.

END

Recommended Advisory Clauses

- (a) to note the comments from Project Manager (East) (PM(E)), Civil Engineering and Development Department (CEDD) that the design, construction and maintenance of the proposed buildings/structures of the development proposal either within or in close vicinity of the limit of works area should not constrain the construction, modification, maintenance, management, operation and use of the tunnel of Trunk Road T2; assessments of the impact to the Trunk Road T2, analysis of quality and jointing of the rock mass within the Site, design, programme and method of construction, etc, should be submitted to his office and the relevant Government departments for agreements when conducting the design; and to liaise with PM(E), CEDD on temporary works, construction sequence, working space and construction program, etc. to avoid clash and conflicts.

- (b) to note the comments from Executive Secretary (Antiquities and Monuments), Antiquities and Monuments Offices that the applicant is required to provide a detailed assessment on the potential impact(s) arising from the proposed conversion of Law Mansion from a residential block into Law Mansion Community Library; appropriate protective, monitoring and mitigation measures for safeguarding the Law Mansion should also be formulated for consideration; and any proposed works should not affect the structural stability and integrity of Law Mansion, including its foundation. The applicant is advised to conduct a survey on the structural conditions of Law Mansion to facilitate the future adaptive re-use of Law Mansion and works to be involved. The applicant is strongly advised to engage all stakeholder(s) of the Law Mansion concerned, i.e. owner(s), tenant(s), occupier(s) etc. at an early stage for the proposed adaptive re-use and implementation of protective, monitoring and mitigation measures throughout the proposed development. The management and maintenance party/ agent of the proposed community library should also be identified in the conservation proposal.

- (c) to note the comments from the Chief Town Planner/Urban Design and Landscape, Planning Department that the approval of the current s.16 planning application does not imply the approval of tree works, such as felling / transplanting or pruning under lease. Tree works application, if any, should be submitted direct to the Lands Department (LandsD) for approval. Advice from LandsD should be sought for matters concerning the lease, where appropriate.

- (d) to note the comments from the Head of the Geotechnical Engineering Office of CEDD that the Natural Terrain Hazard Study report to be submitted at the later detailed design stage must be submitted to the Geotechnical Control Checking Panel of his Office for review and endorsement.