

Annex A Response to Departmental Comments

**S.16 Planning Application for Proposed Residential Institution (Student Hostel) in “Residential (Group C)”
with a minor portion within “Green Belt” Zones at Middleton Towers, 140 Pok Fu Lam Road (Rural Building Lot No. 825 RP)
and adjoining Government Land, Pok Fu Lam, Hong Kong**

Responses to Departmental Comments (Resubmission of 4th Batch)

Item	Bureau/Department	Date
1.	Transport Department	12 June 2026

Response to Departmental Comments – Application No. A/H10/98

Item	Comments Received	Responses
1.	Transport Department (Received via email from Transport Planning Division of Transport Department dated 12.6.2026 and via email from PlanD dated 15.6.2026) (Contact Officers: Ms. Kelly YIU, tel: 3842 6030; Mr. Paul LEE, tel: 2829 5802)	
1.1.	Section 4.1.1 - Please clarify whether baseline or high growth version 2021-based TPEDM is adopted.	The 2021-based TPEDM used in this section is based on the open-source release in PlanD website, which provides only one set of population and employment data per district for 2026 and 2031. As such, it reflects the baseline scenario.
1.2.	Section 5 - Permanent traffic impact on nearby road links, such as Pok Fu Lam Road, is not covered in the report. Please review.	Traffic impact at junction is considered more critical and major junctions along Pok Fu Lam Road have been covered in the report. All key junctions and road links will operate with sufficient capacity in the design year.
	<u>Vehicular and Pedestrian Access:</u>	
1.3.	(a) Section 3.3.1 and 3.3.2: It is noted that the unnamed single-track access road connecting the subject development is only around 4.5m – 5m and cannot accommodate the two-way movement for private car simultaneously with reference to the swept path analysis. In view of the proposed nature of the student hostel, it is considered additional traffic would use the concerned road section, appropriate traffic improvement measures should be considered to resolve the conflict.	It is noted that the vehicle maneuvering space at localized bending regions on the existing access road is limited and prevents two-way movements. Traffic signals will be implemented to facilitate one-way traffic along the access road and to ensure the internal road safety.
1.4.	(b) According to the Master Layout Plan, all pedestrians and vehicles must access the proposed redevelopment	School buses will be arranged for the future residents' daily travel, with bus stop located at the Middleton Tower

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	via aforesaid unnamed single-track access road with a footpath on one side. As per our previous comment, HKU should consider linking the proposed redevelopment to HKU High West to improve the accessibility.	platform. With the proposed traffic control management measures to avoid two-way traffic movement along the existing access road as shown in Annex I , this interim arrangement is considered acceptable within the tentative operation period of the proposed student hostel from 2028 to 2034 prior to the redevelopment of the Middleton. The possible vehicular connection between the Middleton Towers and High West Development will be further reviewed if redevelopment of the Middleton is to proceed in future. The applicant will undertake the necessary upgrading works if requested by the relevant Authority.
	<u>Internal Transport Facilities</u>	
1.5.	(c) Please provide the details of the reference case of the student hall at Sassoon Road for consideration.	Please find below the details of Sassoon Road Residence: • R.C.Lee: Single 137 Rooms / Double 119 Rooms • Lee Hysan: Single 134 Rooms / Double 120 Rooms / Quadruple 1 Room • Wei Lun: Single 131 Rooms / Double 125 Rooms • Student Flat: Double 24 Rooms / Triple 8 Rooms
1.6.	(d) Please review if additional loading/unloading bays are required to suit the future operational need.	With reference to existing Sassoon Road hostel arrangement, there are no designated loading/unloading bay even with internal convenience store.
	<u>Trip Generation/Attraction</u>	
1.7.	(e) As mentioned under our previous comments, HKU should demonstrate that the trip-generation of Tam Towers & Garden could represent the traffic trip pattern of the existing Middleton Towers. The detailed	The transport facilities for both sites are detailed in paragraph 3.5.1 for the TIA report.

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	comparison between Tam Towers & Garden and the existing Middleton Tower, including its internal transport facilities, car parking numbers, the flat sizes, and the respective number of flats are yet to be demonstrated.	
1.8.	(f) As mentioned under section 3.5.4 of the TIA report, it is noted that there is construction works at University Hall. Please clarify the details on excluding construction traffic and pedestrian flow under the assessment for reference. As per our previous comment, the survey location has yet to be demonstrated under the updated TIA submission and RtoC.	The vehicular and pedestrian count survey separated in/out for construction site and University Hall. Survey locations have been included in Annex II of this RtC.
1.9.	(g) With reference to the response-to-comments item 32, the nature of the University Hall of 110 twin rooms with area of 14m2 is different from the future Middleton Tower Student Hostel. As per our previous comment, the utilization of student hostel of University Hall has yet to be presented. Please review and further substantiate if the target group and the nature of the University Hall is similar to the proposed development and consider other development for reference for trip rate and pedestrian estimation as appropriate.	Reference has been made to an in-house trip generation survey conducted for the Po Leung Kuk Lee Shau Kee Youth Oasis in Yuen Long, a youth hostel targeting a similar age group. The site exhibits comparable characteristics, including its relatively remote location from an MTR station and reliance on public transport services such as minibus feeders. Nevertheless, the reference development comprises much more occupants at working age than Middleton, who may have much higher chance of using alternative transport instead of mass transport. In view of similarities in both location and development type, but different composition in occupants, the adopted trip rate is considered a conservative, upper-bound estimate.

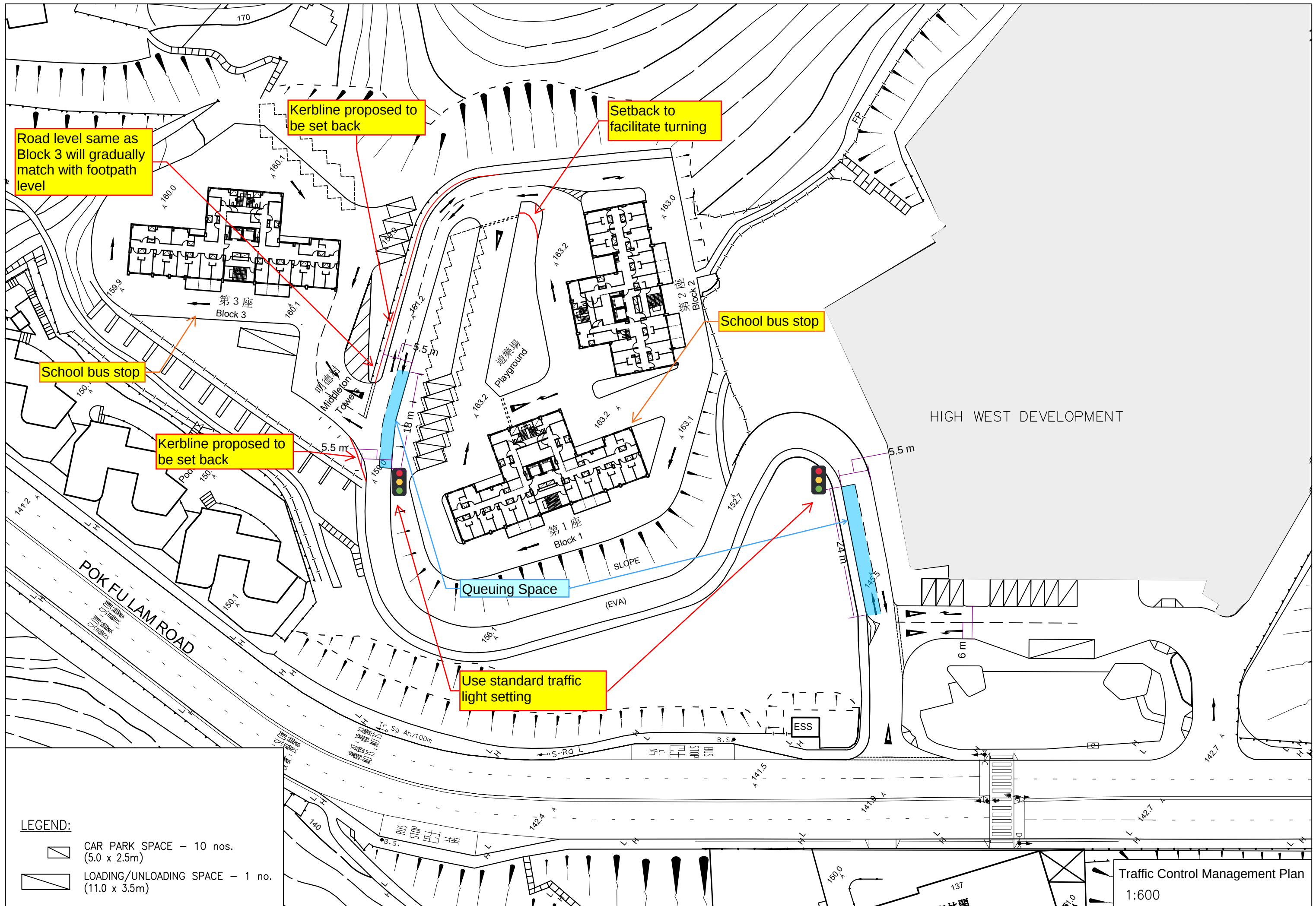
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	<u>Shuttle Bus Services</u>	
1.10.	(h) As per our previous comments, the details of the proposed shuttle bus services, including the routes, stops, frequency, service hours, and utilization are yet to be provided.	The proposed shuttle bus service is updated in the report. New shuttle bus service will be in accordance with our TIA report's recommendation. At least 5 in/out trips within an hour will be arranged for both AM and PM peak.
1.11.	(i) Further to the discussion in the meeting on 11.6.2026, please indicate the proposed shuttle bus stop for the proposed redevelopment in the drawing, advise the size of shuttle bus and provide the relevant swept path analysis to demonstrate that the proposed shuttle bus could maneuver smoothly to the redevelopment site for accessing the proposed shuttle bus stop.	The proposed shuttle bus stop will be located at the platform of Middleton Tower. The proposed bus services will operate with 28-seater light bus. Swept Path Analysis of this light bus is provided in Annex III of this RtC.
1.12.	(j) According to Chapter 2.3 of Volume 2 of TPDM, a passenger-car unit (PCU) value of 3.0 would be assumed for a bus operating on hilly terrain. Please justify your assumption in Table 3.9 that one school bus is equivalent to 2 PCU.	With the revised proposed bus services to 28-seater light bus, the pcu factor of light bus on flat and hilly road are both 1.5.
	<u>Traffic Assessment</u>	
1.13.	(k) For Table 2.2, please note that the junction performance of J7 deviates from our observation. Please review.	The junction performance of J7 is revised based on update junction calculation methodology.
1.14.	(l) Junction J8 should be read as "Signalized Pedestrian Crossing at Pok Fu Lam Road near Belcher's"	Noted and updated in Table 5.1 and 5.2.

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1.15.	(m) As mentioned under our previous comment, the proposed redevelopment would convert the existing staff quarter (total 72 nos. of staff quarters units) into student hostels (approximately 1,000 beds). Given the increase in population by the proposed redevelopment, HKU should provide the relevant traffic assessment for the nearby footpath and crossing facilities which is outstanding from the submitted TIA report. Besides, it is not agreed that the students under the subject development would not use the public transport service as mentioned under Section 3.5.12. Please make reference to other similar projects and carry out the associated assessment on the public transport service as appropriate.	It is proposed to provide shuttle bus services at the platform of Middleton Tower after redevelopment. With far distance between Middleton Tower and Pok Fu Lam Road, the non-desirable walking environment does not encourage pedestrian to walk to Pok Fu Lam Road. It is anticipated that there will be minimal pedestrian demand to footpath in the vicinity of Pok Fu Lam Road.
1.16.	(n) Table 4.3: Please note that the junction improvement works for J6 has yet to be incorporated into the report. Please review.	Noted and incorporated junction improvement works for J6 under the design and construction of redevelopment of Queen Mary Hospital, Phase 1 in Appendix D-3 of the report.
1.17.	(o) Section 4.4.2: Please note that the removal of the traffic associated with the existing use under the design case assessment would underestimate the future traffic flow. Please review and consider appropriate assessment approach and mitigation measures.	The whole Middleton development (3 towers) will be converted into student hostel through internal partitioning, and no more staff quarters will be remained upon completion of the renovation project. As such, removal of all existing traffic generation and consider future trip generation of student hostel is considered appropriate to assess traffic impact.
1.18.	(p) Please provide the assessment on the link flow at Pok Fu Lam Road into the TIA report.	Additional trip generation under the proposed development is minimal. Traffic impact at major junctions along Pok Fu Lam Road have been covered in the report.

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1.19.	(q) Section 6: Please substantiate the details of the construction traffic generating 15pcu/hr for reference. Besides, it is noted that the construction TIA is a preliminary assessment only with limited information on the construction programme, methodology and sequence. The applicant should update the construction TIA in later stage when more information available.	The provided construction traffic has taken reference from other recent conversion and renovation work of HKU. We would like to highlight that the project only involves internal repartitioning works and does not involve demolition or redevelopment activities and therefore the construction traffic is anticipated to be limited.

Annex I

Traffic Control Management Plan



Annex II Survey Location

Annex II - Survey Location outside High West



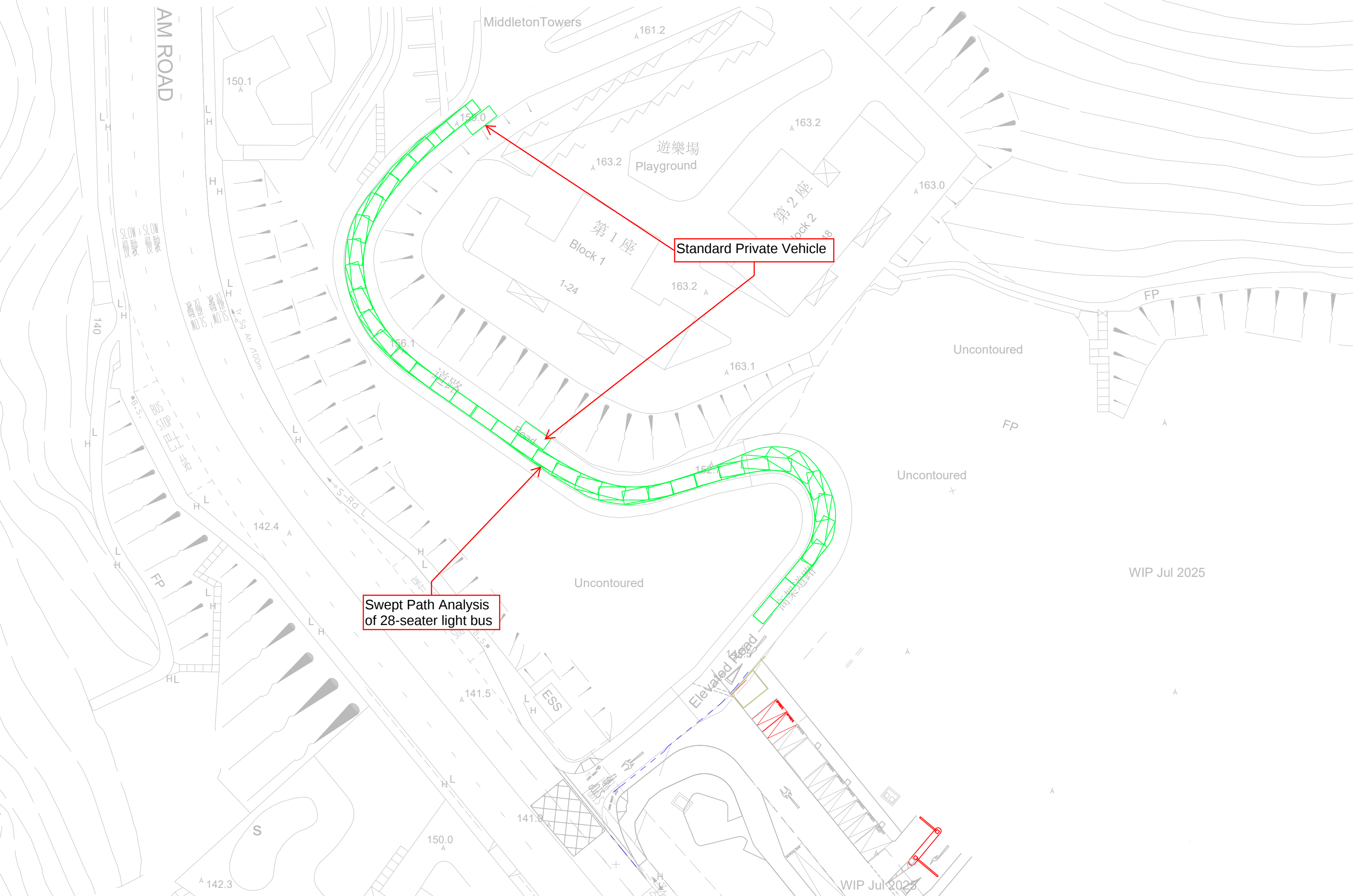
Location: J2

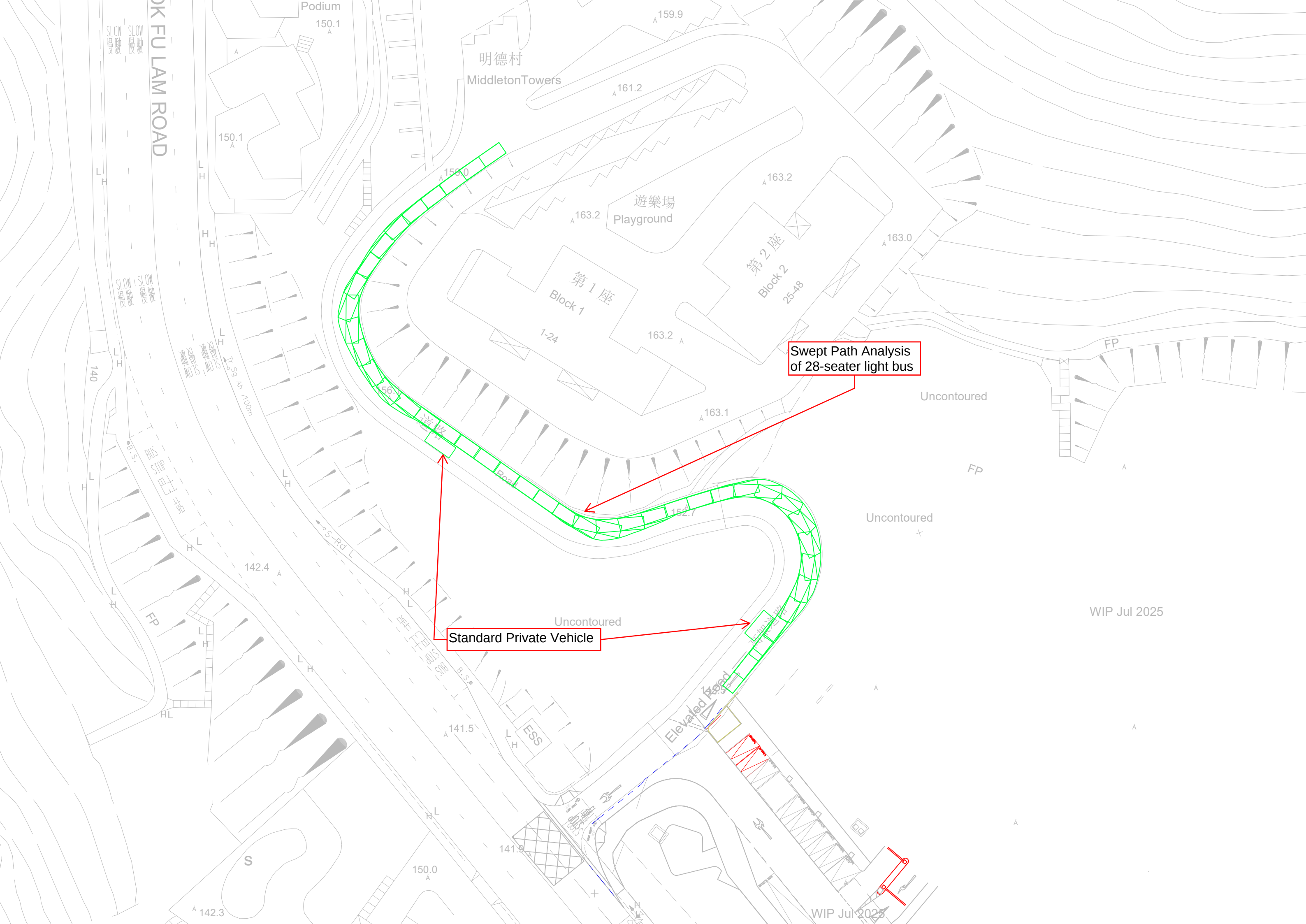


Annex III

Swept Path Analysis for Proposed Shuttle Bus Services

Annex III - Swept Path Analysis of Proposed Shuttle Bus Services





明德村
Middleton Towers

遊樂場
Playground

第1座
Block 1

第2座
Block 2

Swept Path Analysis
of 28-seater light bus

Standard Private Vehicle

WIP Jul 2025

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