

By Email and Hand

Our Ref: S3116/SCAA/23/003Lg

24 December 2025

Secretary, Town Planning Board  
15/F, North Point Government Offices  
333 Java Road  
North Point  
Hong Kong

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Dear Sir/Madam,

**Proposed SCAA Sports Link ("Place of Recreation, Sports or Culture")  
at South China Athletic Association  
88 Caroline Hill Road in Wong Nai Chung  
- S16 Planning Application Submission –  
TPB Ref.: A/H7/189  
Further Information No. 1**

Reference is made to the captioned S16 Planning Application submitted to the Town Planning Board ("TPB") on 17 October 2025 and departmental comments received on .

In response to the departmental comments received, please find attached the Further Information ("F.I.") submission for your consideration. The submission document consists of:

**Response-to-Comment Table**

- Appendix I Revised Drainage Impact Assessment
- Appendix II Revised Pages of the Visual Impact Assessment
- Appendix III Revised Air Ventilation Assessment
- Appendix IV Revised Sewerage Impact Assessment
- Appendix V Revised Pages of the Supporting Planning Statement
- Appendix VI Revised Air Quality Impact Assessment

Meanwhile, should you have any queries in relation to the above, please do not hesitate to contact

Thank you for your kind attention.

Yours faithfully  
For and on behalf of  
**KTA PLANNING LIMITED**

Gladys Ng

Encl. (4 copies)

cc. the Applicant & Team

PL/GN/vy



FS 579819

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**(Planning Application No: A/H7/189)**

## **RESPONSE-TO-COMMENT TABLE**

Comments	Response
<p><b><u>Comments from Chief Engineer/Hong Kong &amp; Islands, Drainage Services Department:</u></b> <b>(Contact Person: Mr Keith WONG; Tel: 3101 2376)</b></p> <p><i>1. Drainage Impact Assessment:</i></p> <ul style="list-style-type: none"><li>a. Please advise the proposed pipe size from the stormwater terminal manhole to SMH7021021.</li><li>b. Please demonstrate the proposed pipe size is capable to discharge stormwater runoff from the subject site using the latest design rainfall parameter as stipulated in Corrigendum No. 1/2024 of Stormwater Drainage Manual. Effect of climate change with design allowance in end-21 st Century scenario (i.e. 16%+12.1% = 28.1%) should be adopted according to Corrigendum No. 1/2022 of Stormwater Drainage Manual. The design calculation should also take into consideration of pipe siltation as per Section 9.3 of Stormwater Design Manual.</li><li>c. Appendix 6-1: Please be reminded that Bransby William’s equation for estimating time of concentration is mainly for natural catchment. For urban areas with relatively small catchments, time of concentration is normally not more than 5 minutes. Please review the design calculation.</li><li>d. A runoff coefficient similar to paved area should be adopted if the greening area as mentioned in para. 5.3.1 and presented in the Master Layout Plan is in form of tree pots or planters.</li></ul>	<p>As advised by the Project Team, the proposed pipe connecting the stormwater terminal to SMH7021021 is 375 mm dia.</p> <p>As shown in Appendix 6-1, the total peak runoff from the Application Site due to the Proposed Development has been calculated by adopting the rainfall increase factor due to climate change and design allowance. The total peak runoff after the proposed development has decreased as compared to the existing condition due to the increase of greenery area. No adverse stormwater drainage impact is therefore anticipated.</p> <p>With reference to the Table 2a in Stormwater Drainage Manual Corrigendum No. 1/2024, the extreme intensity for 5 mins duration and 200-year Return Period has been adopted as conservative approach. Please refer to the revised Drainage Impact Assessment in <i>Appendix I</i>.</p> <p>Please be clarified that the horizontal greenery area at G/F is landscaped area, thus runoff coefficient for grassland has been adopted.</p>

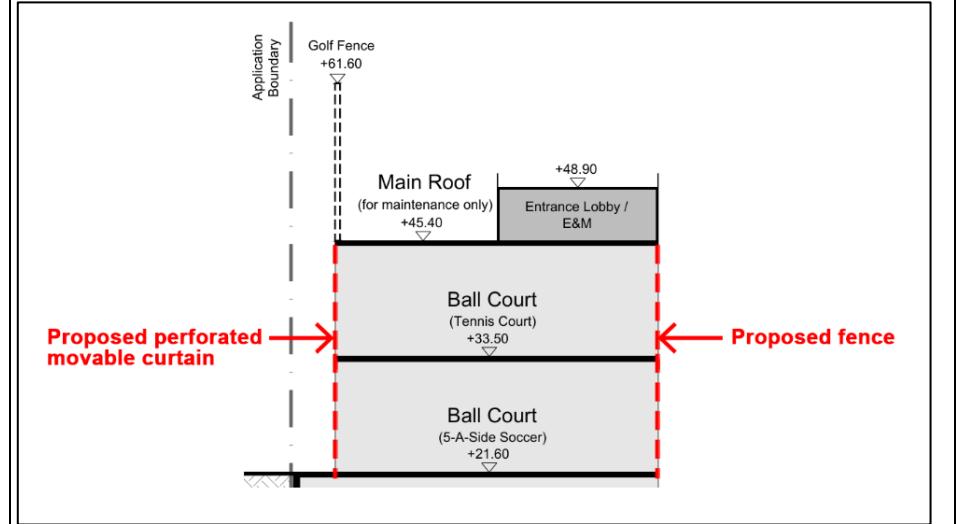
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<p>e. With reference to extreme rainstorm event on 7 September 2023 in Hong Kong, as well as similar occurrences in other regions, it is noted that extreme events exceeding the current design standard (i.e. 1-in-200 year event) are not uncommon. You are therefore advised to consider the incorporation of additional resilience measures, in accordance with the recommendations set out in DSD Practice Note No. 2/2023, with a view to reducing potential loss and damage arising from future extreme events.</p> <p><b><u>2. Sewerage Impact Assessment:</u></b></p> <p>a. Please advise the proposed pipe size and pipe material from the sewage terminal manhole to FMH7019720.</p>	<p>Noted, with reference to the Table 3a of Corrigendum No. 1/2024 of Stormwater Drainage Manual, storm constant for 200-year return period has been adopted in the hydraulic calculation. The peak runoff from Proposed Development has decreased as compared to the existing condition due to increase of greenery area. No adverse stormwater drainage impact is anticipated. Implementation of additional resilience measures, in accordance with the recommendations set out in DSD Practice Note No. 2/2023, will be considered, if necessary.</p> <p>Please be advised that the pipe connecting to the existing manhole is an existing pipe. According to the drainage plan, it is a 225mm diameter vitrified clay pipe.</p>
<p><b><u>Comments from Chief Town Planner/Urban Design and Landscape Section, Planning Department:</u></b>  <b>(Contact Person: Ms Vanessa TSANG; Tel: 3565 3942)</b></p> <p>Please find below our observations/comments from urban design, visual and air ventilation perspectives:</p> <p><b><u>Urban design and visual perspectives</u></b></p> <p>c. specific comments on VIA:</p> <p>(i) VP H – the rating of magnitude of change and resultant visual impact should be moderate and moderately adverse respectively;</p>	<p>Impact significance has been revised accordingly (revised pages <i>Appendix II</i> refer).</p>

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<p>(ii) the design of the proposed perforated movable curtain and fence is missing; and</p>	<p>The images below show the design of the proposed perforated movable curtain and fence.</p> <p><b>Location of the proposed perforated movable curtain and fence</b></p> 

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	<p>Design reference images of the proposed perforated movable curtain are shown below. It is subject to further development at detail design stage.</p> 

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	<p><b>Image below shows the design the proposed fence at 2/F &amp; 3/F. It is subject to further development at detail design stage.</b></p> 
<p>(iii) it is noted from the Architectural Drawings that a golf fence up to +61.6mPD is proposed at the main roof of the proposed development. However, it is not annotated in the photomontages.</p> <p><u>Air ventilation perspective</u></p> <p>d. as noted from the AVA-EE, the report evaluates the potential air ventilation impact of the proposed development compared against the existing condition. Specific comments on AVA-EE are as follows:</p> <p>(i) the proposed development appears to be enclosed structure and</p>	<p>Annotations have been added to the photomontages (revised pages <i>Appendix II</i> refer).</p> <p>As a conservative approach, it is assumed that the proposed perforated</p>

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<p>the effectiveness of the proposed perforated curtain and fence cannot be guaranteed;</p> <p>(ii) the discussion on the proposed golf fence up to +61.6mPD is missing;</p> <p>(iii) reference could also be made to the Term Consultancy for AVA Services – Expert Evaluation on Air Ventilation Assessment of Causeway Bay Area, the Term Consultancy for Expert Evaluation on Air Ventilation Assessments for an Instructed Project for Causeway Bay Area - Expert Evaluation Report (2017) and the Term Consultancy for AVA Services - Expert Evaluation on Air Ventilation Assessment for Wong Nai Chung Area;</p> <p>(iv) in view of the hilly topography and the residential developments at Happy View Terrace, there may be only portion of prevailing wind from southwest between The Leighton Hill and Beverly Hill reaching the Site;</p> <p>(v) para. 7.1.5 – the description of building setback from the site boundary of ‘over 20m’ is inconsistent with “at least 20m setback” throughout the report;</p>	<p>curtain and fence are part of the enclosed structure of the proposed development for the purpose of discussing the air ventilation impact as a conservative approach. Please refer to the revised Air Ventilation Assessment in <i>Appendix III</i>.</p> <p>The description of the proposed golf fence has been provided in Para 4.1.1 and relevant discussion of the golf fence has been provided in Section 9 of the revised Air Ventilation Assessment in <i>Appendix III</i>.</p> <p>Reference have been made to the Expert Evaluation on Air Ventilation Assessment of Causeway Bay Area, the Term Consultancy for Expert Evaluation on Air Ventilation Assessments for an Instructed Project for Causeway Bay Area - Expert Evaluation Report (2017), the Term Consultancy for AVA Services - Expert Evaluation on Air Ventilation Assessment for Wong Nai Chung Area and Initial Study on Air Ventilation Assessment for Section 16 Planning Application (A/H7/188), and these have been indicated in Section 9 the revised Air Ventilation Assessment in <i>Appendix III</i>.</p> <p>With the reference to the initial study of air ventilation assessment for Section 16 Planning Application No. A/H7/188, it is noted that the southwestern wind is mostly flowing from the gap between Olympic House and Hong Kong Stadium at the south of the Subject Site. Relevant discussion on this aspect has been provided in Section 9 the revised Air Ventilation Assessment in <i>Appendix III</i>.</p> <p>Relevant text has been revised to “at least 20m setback” throughout the report.</p>

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<p>(vi) Table 7.1 and relevant figures – Application No. A/H7/188 was approved on 24.10.2025 with a different layout as compared with A/H7/181; and</p> <p>(vii) Figure 8.1 – there is a discrepancy between the annotation arrow and the description of setback from the site boundary.</p> <p>e. specific comments on Supporting Planning Statement:</p> <p>(i) Figure 4.3 – there is a discrepancy between the annotation arrow and the description of setback from the site boundary.</p>	<p>Please be kindly confirmed that information has been adopted from the Planning Application no. A/H7/188 instead of A/H7/181.</p> <p>Description in 8.1.4 has been updated accordingly (<i>Appendix III</i> refers).</p> <p>Please refer to the response above.</p>
<p><b>Comments from Environmental Protection Department:</b> <b>(Contact Person: Ms Virginia WONG; Tel: 2835 1109)</b></p> <p>3. For clarification, the applicant is required to provide the following information:</p> <p>(a) clarify whether any public announcement system, portable loudspeaker or any form of amplification system would be allowed within the Site;</p> <p>(b) whether there would be any administrative measures to minimise the potential noise nuisance to the surrounding sensitive receivers;</p> <p>(c) include the SIA for previous E-Sports Complex as Annex for others' easy reference;</p>	<p>The public announcement system and its ancillary facilities would only be accommodated in the multi-function rooms on 1/F, which are designed with a fully enclosed façade envelope.</p> <p>The proposed development will align its operating hours with the existing complex, ceasing operations at 10:00 pm. This strikes a balance between after work work-outs and noise generation during late-night hours.</p> <p>Please note that the previous approved SIA report has been sent to EPD via a separate email.</p>

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<p>(d) illustrate an updated hydraulic calculation in the SIA</p> <p>4. Please find his technical comments on the Planning Statement from <b>Annex A</b>.</p>	<p>Please note that the hydraulics calculation is attached in Appendix 6-2 of <i>Appendix IV</i>.</p>
<p><b>Annex A</b></p> <p>His comments on <u>Planning Statement and AQIA</u> are as below:</p> <p><b>Planning Statement</b></p> <ol style="list-style-type: none"> <li>1. Section 4.7.1 – Please replace “dust suppression” and “dust” with “air quality control” and “air quality” in line 1 and 3 respectively.</li> <li>2. Section 4.7.1 and 5.8.4 – Please also supplement Air Pollution Control (Fuel Restriction) Regulations and Air Pollution Control (Non-road Mobile Machinery) (Emission) Regulation.</li> <li>3. Section 4.7.1-4.7.2, 5.8.5 – Please supplement conclusion related to industrial chimney and odour sources.</li> <li>4. Section 5.8.4 – Please replace “dust suppression” and “significant dust” with “air quality control” and “adverse air quality impact” in line 2 and 3 respectively.</li> </ol> <p><b>AOIA</b></p> <ol style="list-style-type: none"> <li>1. Table 4-1 – <ol style="list-style-type: none"> <li>a. Please update the concentration limit column with new AQOs, and supplement 24-hour NO<sub>2</sub>, peak season O<sub>3</sub>, and 24-hour CO.</li> </ol> </li> </ol>	<p>Section 4.7.1 has been updated accordingly (<i>Appendix V</i> refers).</p> <p>Sections 4.7.1 and 5.8.4 have been updated accordingly (<i>Appendix V</i> refers).</p> <p>Relevant information related to industrial chimney and odour sources have been added to Section 4.7.2 and a new 5.8.6.</p> <p>Section 5.8.4 has been updated accordingly (<i>Appendix V</i> refers).</p> <p>Table 4-1 has been updated accordingly (<i>Appendix VI</i> refers).</p>

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<p>b. Please supplement “per Calendar Year” in the last column header.</p> <p>2. Section 4 – Please supplement brief discussion on relevant sub-legislations of APCO (e.g. Cap. 311Z, Cap. 311I).</p> <p>3. Table 4-2 – Please make reference to Table 3.1 when discussing the buffer distance requirements for chimneys.</p> <p>4. Please discuss the background air quality of the project area by quoting the AQMS and PATH data (for grids covered by 500m assessment area) which are available in SAMP v2.1.</p> <p>5. Section 5.1.1 – Please indicate the representative ASRs in Figure 3.1.</p> <p>6. Table 5-1 –</p> <ul style="list-style-type: none"> <li>a. Please provide the uses and the building heights of the ASRs.</li> <li>b. For planned ASRs, please provide the operation year and source of information.</li> </ul> <p>7. Section 5.1.2 –</p> <ul style="list-style-type: none"> <li>a. Please discuss gaseous emissions during construction.</li> </ul>	<p>The last column header of Table 4-1 has been updated accordingly (<i>Appendix VI</i> refers).</p> <p>Discussions on relevant sub-legislations of APCO has been added in Section 4.3 (<i>Appendix VI</i> refers).</p> <p>Table 4-2 has been updated with reference to Table 3.1 of HKPSG (<i>Appendix VI</i> refers).</p> <p>The discussions of background air quality of the project area have been added in Section 5 (<i>Appendix VI</i> refers).</p> <p>Please note that Section 5.1.1 has been renumbered as Section 6.1.1.</p> <p>Representative ASRs have been added in Figure 3-1 (<i>Appendix VI</i> refers).</p> <p>Please note that Table 5-1 has been renumbered as Table 6-1.</p> <p>Table 6-1 has been updated accordingly (<i>Appendix VI</i> refers).</p> <p>The discussions on the planned ASRs have been added under Section 6.1.7 (<i>Appendix VI</i> refers).</p> <p>Please note that Section 5.1.2 has been renumbered as Section 6.1.2.</p> <p>The discussions about gaseous emissions have been added in Section 6.1.5 to Section 6.1.6 (<i>Appendix VI</i> refers).</p>

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b. Please provide more information including but not limited to: the size of the demolition, site formation or/and excavation area, amount of excavated materials to be handled, number of dump trucks and mechanical equipment to be used per time over the work site.	Please note that details such as the extent of demolition, site formation and excavation, volume of excavated materials to be handled, and the number of mechanical equipment operating concurrently are not available during at the planning stage of the Proposed Development. The construction activities will be carried out in compliance with all relevant standards and regulations.
8. Section 5.1.3 – Please replace “dust” with “air quality”	A new Section 6.1.2 has been added to include the above.
9. Section 5 – Please review if there are any concurrent projects within 500m assessment area. If affirmative, please discuss cumulative constructional impact.	Please note that Section 5.1.3 has been renumbered as Section 6.1.4. The term “dust” has been changed to “air quality”.
10. Section 6 – Please identify representative ASRs of the subject site e.g. openable windows and the fresh air intakes of the most affected air sensitive uses.	Please note that Section 5 has been renumbered as Section 6. Based on the best available information, there are three concurrent projects within our 500m assessment area, discussions on cumulative impact have been added in Section 6.1.7 ( <i>Appendix VI</i> refers). Please note that Section 6 has been renumbered as Section 7. Kindly note that detailed design of the exact locations of fresh air intakes is not available at planning stage, however the Proposed Development will comply with the relevant road buffer distance and chimney buffer distance requirements stipulated in the HKPSG. The detailed design of the exact locations of fresh air intakes, will also be arranged to comply with the identified buffer distance criteria.

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<p>11. Section 6.2.1 – ATC 2024 is released. Please update.</p>	<p>Please note that Section 6.2.1 has been renumbered as Section 7.2.1.</p> <p>Section 7.2.1 has been updated with ATC 2024 (<i>Appendix VI</i> refers).</p>
<p>12. Section 6.3.2 –</p> <ul style="list-style-type: none"> <li>a. Please check if there will be any planned chimney e.g. the chimney at the proposed District Court Building at Caroline Hill Road.</li> <li>b. Please provide evidence e.g. photo of the site visit, confirmation from the operator, for the removed chimney at Saint Paul’s Convent.</li> <li>c. Please be reminded that it is the responsibility of the Project Proponent and their consultant to confirm the validity of the emission data used in the AQIA. Any errors found in their emission data used may render the AQIA results invalid.</li> </ul>	<p>Please note that Section 6.3.2 has been renumbered as Section 7.3.2.</p> <p>As at 5 September 2025, there are 4 nos. of chimneys at the Proposed District Court Building at Caroline Hill Road as noted from the Specified Processes (SP) Licence. Section 7.3.4 has been added to reflect the aforementioned.</p> <p>Noted, the photographs taken during the site visit has been added in Table 7-2 (<i>Appendix VI</i> refers).</p> <p>Noted.</p>
<p>13. Section 6.3.3 –</p> <ul style="list-style-type: none"> <li>a. According to the planning statement, the main roof level would be +45.4 mPD. Please compare the height difference between the chimneys at Saint Paul’s Hospital Main Block and the proposed development, and discuss the required buffer distance. Please note that &gt;10m buffer distance is required for height difference &gt;40m. Please revise the discussion in Section 6.3.3 and Figure 6-2.</li> </ul>	<p>Please note that Section 6.3.3 has been renumbered as Section 7.3.3.</p> <p>Noted, Section 7.3.4 has been revised (<i>Appendix VI</i> refers).</p>

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<p>b. Please provide the references for the locations and heights of the chimneys of Saint Paul’s Hospital.</p>	<p>Please note that the location and heights of the chimneys were extracted from the Hong Kong open3Dhk website.</p>
<p>14. Section 6.3.4 –</p> <p>a. In 1st line, please revise the text as follows:... A diesel generator owned by Tung Wah Eastern <b>Hospital</b> was found...</p> <p>b. Please provide the details of the verbal communication e.g. date, time, the name of the person- in-charge or otherwise please provide written record about the use of the chimney.</p>	<p>Please note that Section 6.3.4 has been renumbered as Section 7.3.5. Noted, Section 7.3.5 has been revised accordingly (<i>Appendix VI</i> refers).</p> <p>Please be advised that the verbal communication with Tung Wah Eastern Hospital took place on 26 May 2021 with Ms. Pauline Chan. The date of the communication has been added in Section 7.3.5.</p>
<p>15. Section 6.3 – Please specify if the proposed development have no industrial chimney emission.</p>	<p>Please note that Section 7.4 has been added to discuss the industrial emission from the Proposed Development.</p>
<p>16. Please discuss the air quality impact from carpark of the proposed development, and provide the carpark exhaust and fresh air intake locations. Please also supplement if ProPECC PN 2/96 will be followed.</p>	<p>Please note that Section 7.4 has been added to discuss the air quality impact from carpark of the Proposed Development.</p> <p>Kindly note that the detailed design of the exact locations of carpark exhaust and fresh air intakes is not available at planning stage. However, the Proposed Development will be planned to comply with the relevant regulations and requirements.</p>
<p>17. Figure 3-1 – Please overlay PATH grids.</p>	<p>Noted, Figure 3-1 has been updated accordingly (<i>Appendix VI</i> refers).</p>
<p>18. Figure 6-1 – Please indicate the location of fresh air intake of the centralized AC system.</p>	<p>Kindly note that the detailed design of the exact location of fresh air intake of the centralised AC system is not available at planning stage. However, the Proposed Development will be planned to comply with the relevant regulations and requirements.</p>

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19. Figure 6-3 – Please rectify the colour of symbol for diesel emergency generator of Tung Wah Eastern Hospital.	Noted, Figure 6-2 has been revised accordingly ( <i>Appendix VI</i> refers).
20. Please supplement north arrow in the figures.	Noted, all the Figure 3-1, Figure 6-1 and Figure 6-2 have been updated.
21. Please highlight all changes in the next submission.	Noted.
<b><u>Comments from Critical Infrastructure Security Coordination Centre (CISCC), Hong Kong Police Force:</u></b> <b>(Contact Person: Ms Crystal CHAU; Tel: 2860 5953)</b>  According to the submitted information, the rooftop will be used for maintenance only. If the rooftop is to be used as a ball court in the future, appropriate measures should be implemented to prevent people from throwing projectiles or ball toward Planned District Court Building.	Noted.
<b><u>Comments from Road Management Office Enforcement and Control, Hong Kong Police Force:</u></b> <b>(Contact Person: Mr Raymond LAW; Tel: 3660 1887)</b>  It is advised that each Temporary Traffic Arrangement (TTA) involving works on footpath and/or carriageway should be submitted to this office and Transport Department for comment before implementation.	Noted.

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Consolidated by: **KTA Planning Limited**

Date: **23 December 2025**

- Appendix I Revised Drainage Impact Assessment
- Appendix II Revised Pages of the Visual Impact Assessment
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