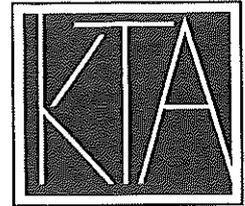


By Email and Hand

Our Ref: S3116/SCAA/23/007Lg

5 March 2026

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



PLANNING LIMITED
規劃顧問有限公司

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. 4**

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 27 January and 5 February 2026.

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 Air Ventilation Assessment – Expert Evaluation
- Appendix II Replacement Pages of the Supporting Planning Statement
- Appendix III Revised Air Quality Impact Assessment
- Appendix IV Updated Traffic Impact Assessment

Meanwhile, should you have any queries in relation to the above, please do not hesitate to contact Ms [REDACTED] or the undersigned at [REDACTED]

Thank you for your kind attention.

Yours faithfully
For and on behalf of
KTA PLANNING LIMITED


Gladys Ng

Encl. (4 copies)

cc. DPO/HK – Mr Harvey Law (By Email)
the Applicant & Team

PL/GN/vy



FS 579819

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

(Planning Application No: A/H7/189)

RESPONSE-TO-COMMENT TABLE

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

(Planning Application No: A/H7/189)

Comments	Response
<p><u>Comments from the Chief Town Planner/Urban Design and Landscape Section:</u> (Contact Person: Ms Vanessa TSANG; Tel: 3565 3942)</p> <p>(c) Comments to the Consultant on AVA-EE and Supporting Planning Statement (SPS):</p> <p>(i) the Consultant may wish to review and incorporate our comments previously provided in (d)(iv) regarding the wind from the southwest of the Site into the evaluation of the AVA-EE report;</p> <p>(ii) as the site is vacant currently, it is inevitable that the proposed development would result in some adverse impact when compared with the baseline scheme. It is considered that the proposed building setback of at least 20m from the southeastern site boundary would alleviate potential air ventilation impact instead of “improving wind environment” along the road and local areas at the north/south/west of the Site as concluded in the AVA-EE and para. 5.8.7 of the SPS; and</p> <p>(iii) Figure 8.1 of the AVA-EE and para. 4.5.2 & Figure 4.3 of the SPS – as previously commented, the blue arrow of “at least 20m setback” should be confined to the site boundary to avoid misinterpretation.</p>	<p>For summer condition, it is anticipated that the prevailing wind will penetrate through the separation between The Leighton Hill and Beverly Hill. The relevant discussion has been provided in Section 9.1.7 to 9.1.11 of the revised AVA-EE in <i>Appendix I</i>.</p> <p>The relevant text has been revised from “improving wind environment” to “alleviate potential air ventilation impact” throughout the report (<i>Appendix I</i> refers).</p> <p>The relevant text and figures have been revised accordingly. Please refer to <i>Appendix I</i> for the revised Figure 8.1 and <i>Appendix II</i> for the revised para. 4.5.2 & Figure 4.3.</p>

Proposed SCAA Sports Link (“Place of Recreation, Sports or Culture”)
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(Planning Application No: A/H7/189)

Comments	Response
<p><u>Comments from the Director of Environmental Protection:</u> (Contact Person: Ms Virginia WONG; Tel: 2835 1109)</p> <p>His comments on the 1st Further information are as below:</p> <ol style="list-style-type: none"> 1. Table 4-2 – Please supplement buffer distance for under flyovers. 2. Section 4.3.1 – Please supplement brief descriptions for the legislations and guidelines. 3. Section 5.1.1 – Please explain why year 2030 is chosen for background concentrations. <ol style="list-style-type: none"> 4. Table 5-1 – <ol style="list-style-type: none"> a. Please provide the level of PATH data. b. Please supplement ozone peak season. c. Suggest to remove Notes [2] and [4]. Please supplement that the data are obtained from Smart Air Modelling Platform (SAMP v2.1). 	<p>Table 4-2 has been revised accordingly (<i>Appendix III</i> refers).</p> <p>Section 4.3 has been revised accordingly (<i>Appendix III</i> refers).</p> <p>Please be clarified that as the Proposed Development is expected to be in operation in 2030, the PATH v3.0 data in Year 2030 have been adopted to represent the future background air quality concentrations at the 500m assessment area.</p> <p>Please note that Section 5.1.1 has been renumbered as 5.1.2 in <i>Appendix III</i>.</p> <p>Table 5-1 has been renumbered as Table 5-2 and updated accordingly.</p> <p>Table 5-1 has been renumbered as Table 5-2 and updated accordingly.</p> <p>Table 5-1 has been renumbered as Table 5-2 and updated accordingly.</p>

**Proposed SCAA Sports Link (“Place of Recreation, Sports or Culture”)
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(Planning Application No: A/H7/189)

Comments	Response
5. Section 5 – Please supplement background concentrations of the nearest AQMS for recent 5 years.	Please refer to the new Section 5.1.1 and Table 5-1 for the background concentrations of the nearest AQMS for recent 5 years (<i>Appendix III</i> refers).
6. Section 6.1.8 – Please indicate the locations of the concurrent projects in a figure.	Figure 6-1 has been added to show the locations of the concurrent projects (<i>Appendix III</i> refers).
7. Section 7.2.3 – Please replace “significant” with “adverse” in the 2 nd last line.	Section 7.2.3 has been revised accordingly (<i>Appendix III</i> refers).
8. Section 7.3.3 and 7.3.4– Please remove “Area with 100-200m buffer...to the Proposed Development.” In line 6-11 of Section 7.3.3, and “As such,...to the Proposed Development” in line 6-10 of Section 7.3.4. Please supplement that 10m buffer distance is required, and that the buffer distance requirement can be met and no adverse air quality impact from the concerned chimneys is anticipated.	Section 7.3.3 and 7.3.4 have been updated accordingly (<i>Appendix III</i> refers).
9. Section 7.3.4 – Please revise to “between the hospital chimneys at Proposed District Court Building” in line 4.	Section 7.3.4 has been revised accordingly (<i>Appendix III</i> refers).
10. Section 7.4 and 7.4.3 – Please delete “Industrial” in section heading and line 1 of Section 7.4.3.	Noted, Section 7.4 and 7.4.3 have been revised accordingly (<i>Appendix III</i> refers).
11. Section 7.4.1 – Please delete “As” in line 2.	Section 7.4.1 has been revised accordingly (<i>Appendix III</i> refers).
12. Section 7.4.2 – Please supplement that detailed design of the exact locations of carpark exhaust and fresh air intakes is not available at planning stage, and that the exhaust air outlets should be located	Section 7.4.2 has been revised accordingly (<i>Appendix III</i> refers).

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Comments	Response
<p>away from nearby ASRs.</p> <p>13. Section 8.1.2 – Please revise to “industrial chimneys” in line 3.</p> <p>14. Figure 6-1 (G/F) – Please indicate the meaning of green area (landscape area?).</p> <p>15. Figure 6-1 – Suggest to assign different figure no. for different floors for easy reference.</p> <p>16. Figure 6-2 – Please explain the meaning of the logos shown in cyan colour.</p> <p>17. Please use consistent names for “St. Paul’s Convent”, “Saint Paul’s Convent”, “St. Paul’s Hospital”, “Saint Paul’s Hospital”.</p> <p>18. Please highlight all changes in the next submission.</p>	<p>Section 8.1.2 has been revised accordingly (<i>Appendix III</i> refers).</p> <p>Figure 6-1 has been renumbered as Figure 6-2 and revised accordingly (<i>Appendix III</i> refers).</p> <p>Noted, different figures have been prepared for each floor as shown in Figures 6-2 to 6-6 (<i>Appendix III</i> refers).</p> <p>Figure 6-2 has been renumbered as Figure 6-7 and the irrelevant logo has been removed (<i>Appendix III</i> refers).</p> <p>The names have been updated as “St. Paul’s Convent” in the report (<i>Appendix III</i> refers).</p> <p>Noted.</p>
<p><u>Comments from the District Land Officer/Hong Kong East:</u> (Contact Person: Ms Phoebe TAI; Tel: 2835 1635)</p> <p>According to her record, the Annex A of Appendix II of the PS is a Tree Survey Report instead of a Tree Preservation and Removal Proposal (“TPRP”). Please clarify and include a TPRP for consideration or comments by PlanD/TPB if otherwise.</p>	<p>Separate TPRP will be submitted to Lands Department for approval in due course after the approval of this application.</p>

**Proposed SCAA Sports Link (“Place of Recreation, Sports or Culture”)
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88 Caroline Hill Road in Wong Nai Chung
S16 Planning Application**

(Planning Application No: A/H7/189)

Comments	Response
<p><u>Comments from the Transport Department:</u> (Contact Person: N/A; Tel: N/A)</p> <p>Responses-to-Comments (R-to-C)</p> <p>1) R-to-C item I - section 2.4 refers. Your R-to-C mentioned that the parking ratio of the proposed SCAA Sport Link is 1 space per 497 m² GFA which is considered sufficient as compared with the existing SCAA Complex. Please incorporate the supporting information in the revised TIA report and justify also the demand of L/UL bays. On the other hand, the ratio is inconsistent with the one mentioned in section 2.4 of the revised TIA which proposed the parking ratio to be 1 car parking space per 124 m² GFA.</p> <p>2) R-to-C item 9 - I note that the anticipated pedestrian routings have been shown in Figure 3.3. Please provide details regarding the distribution of pedestrian flow to/from the proposed development in order to assess the associated impact to the respective section of footpath in table 4.12.</p> <p>3) R-to-C item 2 - Regarding the swept path analysis of the Jim HGV in Figure TI, I note that vehicles are encroaching onto the road kerb. Please review.</p> <p>Revised Traffic Impact Assessment</p> <p>4) Section. 4.2 - Please advise whether there will be any large scale event conducted in the proposed SCAA Sport Link which will attract large number of audience.</p>	<p>Please be clarified that the car parking ratio is 1 space per 497m² GFA. The supporting information has been incorporated into the TIA report accordingly. Please refer to Section 2.4 of the updated TIA report in <i>Appendix IV</i> for detail.</p> <p>Please refer to Figure 3.3 of the updated TIA report for detail.</p> <p>The swept path analysis has been reviewed and updated accordingly. Please refer to updated Figure T1 for detail.</p> <p>SCAA confirms that they do not expect to conduct large-scale event at the proposed SCAA Sports Link.</p>

**Proposed SCAA Sports Link (“Place of Recreation, Sports or Culture”)
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Comments	Response
5) Table 4.7 refers. Regarding the trip generation of the weekend peak hour, please clarify why adopting the weekday PM peak hour for weekend peak hour is more conservative approach. In addition, please advise if there is any trip generation survey on weekend.	Please be clarified that no trip generation survey on weekend is conducted for the planned developments. The largest trip rates among weekday AM and PM Peak have been adopted for conservative assessment purpose. Please refer to Table 4.7 of the updated TIA report in <i>Appendix IV</i> for detail.
6) Figures 3.2, 4.1 and 4.2 refer. Some traffic flow directions are not correct and some peak hour traffic flows seem to be deviated from the traffic survey in the TIA. Please refer to the markup comment under Annex I and review.	Traffic flows and directions have been reviewed and updated accordingly. Please refer to Figures 3.1, 4.1 and 4.2 of the updated TIA report in <i>Appendix IV</i> for detail.
7) Table 4.12 refers. The existing crossings along Leighton Road, Pennington Street, and Yun Ping Road are missing from the future capacity analysis. Please refer to the markup comments on Figure 3.3 of Annex I. In addition, the crossing at the new access road formed under the Caroline Hill Road commercial development shall also be evaluated. Regarding the pedestrian impact at the crossings, please consider assessing (a) the LOS based on pedestrian delay and (b) the LOS for central refuge islands in accordance with the Chapter 18 - Pedestrian Methodology of the Highway Capacity Manual 2000 for our further review. Since pedestrian will need to wait at the footpath before pedestrian green at the signalized junction, assuming LOS for normal footpath for the concerned crossings in the calculation may underestimate the actual pedestrian impact.	As shown in Figure 3.3, the destination of the anticipated pedestrian routes would be MTR Causeway Bay Station in the northwest and the bus stop/bus terminus on Tung Lo Wan Road and Moreton Terrace in the northeast. Therefore, pedestrians to be induced by the proposed SCAA Sports Link is not expected to use the concerned pedestrian crossing at the new access road formed under the Caroline Hill Road commercial development. For central refuge islands at J/O Leighton Road, Pennington Street, and Yun Ping Road, additional assessment for central refuge islands has been conducted accordingly. Please refer to Section 4.11 of the updated TIA report for detail.

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Comments	Response
8) Section 4.9.5 refers. It is noted that an indicative scheme of pedestrian linkage system to connect the subject site to the commercial site (IL 8945) was proposed and initial discussion regarding the footbridge design with the concerned developer, Hysan Development Co. Ltd (Hysan) was held on 4 November 2024. Please provide some more information of the discussion as well as the way formed for the proposed pedestrian linkage system.	SCAA and Hysan exchanged information and drawings during and after the meeting to assess the technical feasibility of the proposed connection, yet we are unable to disclose the information as the proposal has not been confirmed. Upon the approval of the current planning application, further discussion will be carried out with the owner of adjoining development and relevant government departments regarding land lease issue, maintenance liability, and funding arrangement.

Consolidated by: **KTA Planning Limited**

Date: **3 March 2026**

Appendix I Revised Air Ventilation Assessment – Expert Evaluation

Appendix II Replacement Pages of the Supporting Planning Statement

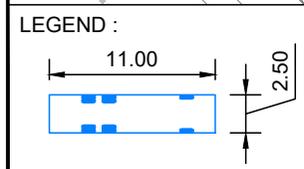
Appendix III Revised Air Quality Impact Assessment

Appendix IV Updated Traffic Impact Assessment

**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**

(Planning Application No: A/H7/189)

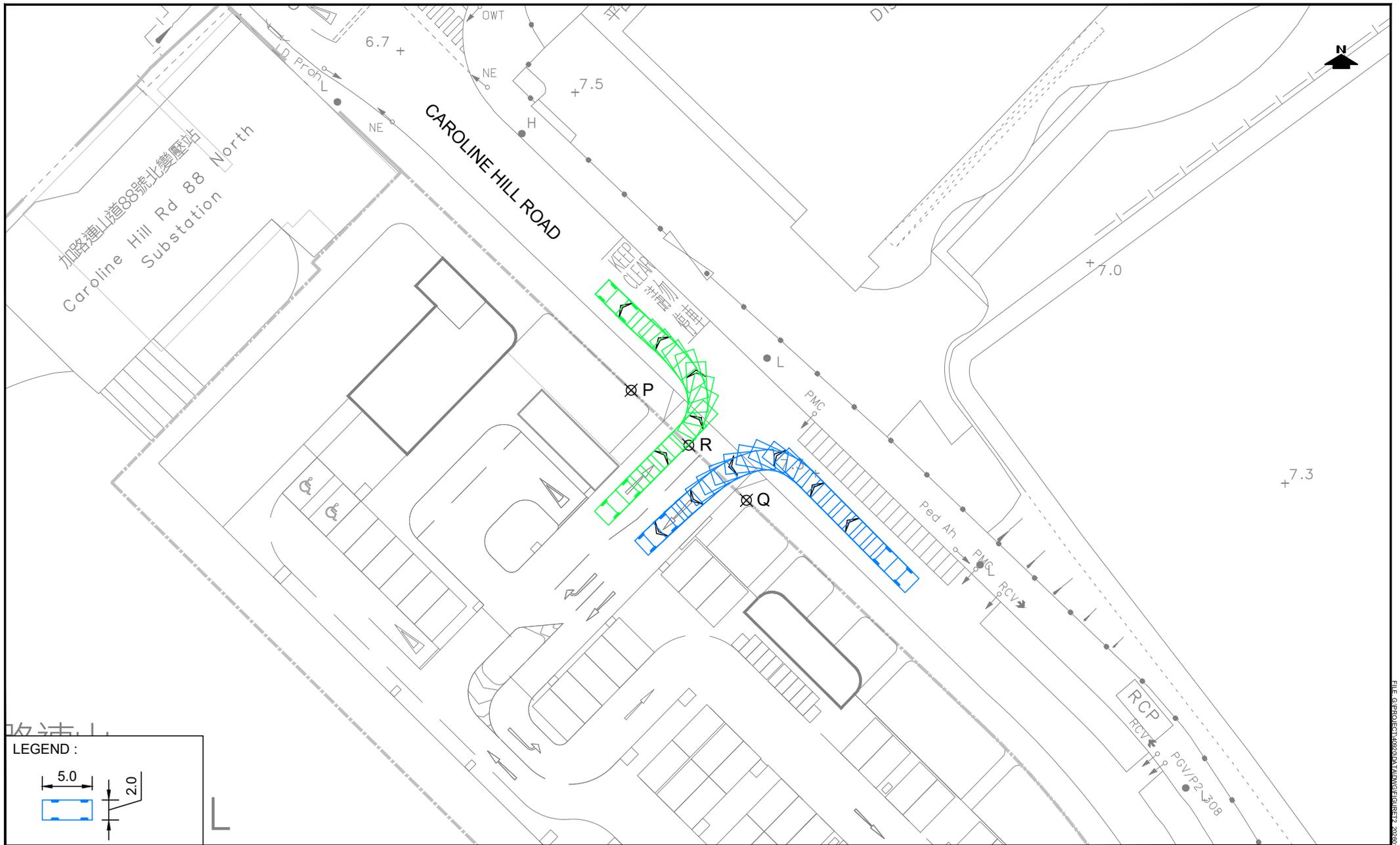
FIGURE T1



PROJECT NO.	40920	
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DRAWN	CLL	SCALE 1:500 @ A4
CHECKED	SLN	

PROJECT TITLE	PROPOSED SCAA SPORTS LINK AT SOUTH CHINA ATHLETIC ASSOCIATION 88 CAROLINE HILL ROAD IN WONG NAI CHUNG	
DRAWING TITLE	SWEPT PATH ANALYSIS - 11m HGV AT RUN - IN / OUT	

DRAWING NO.	FIGURE T1	REV.	.
LLA 顧問有限公司		Consultancy Limited	



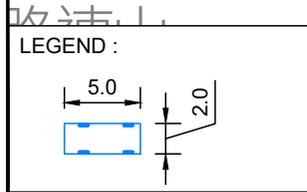
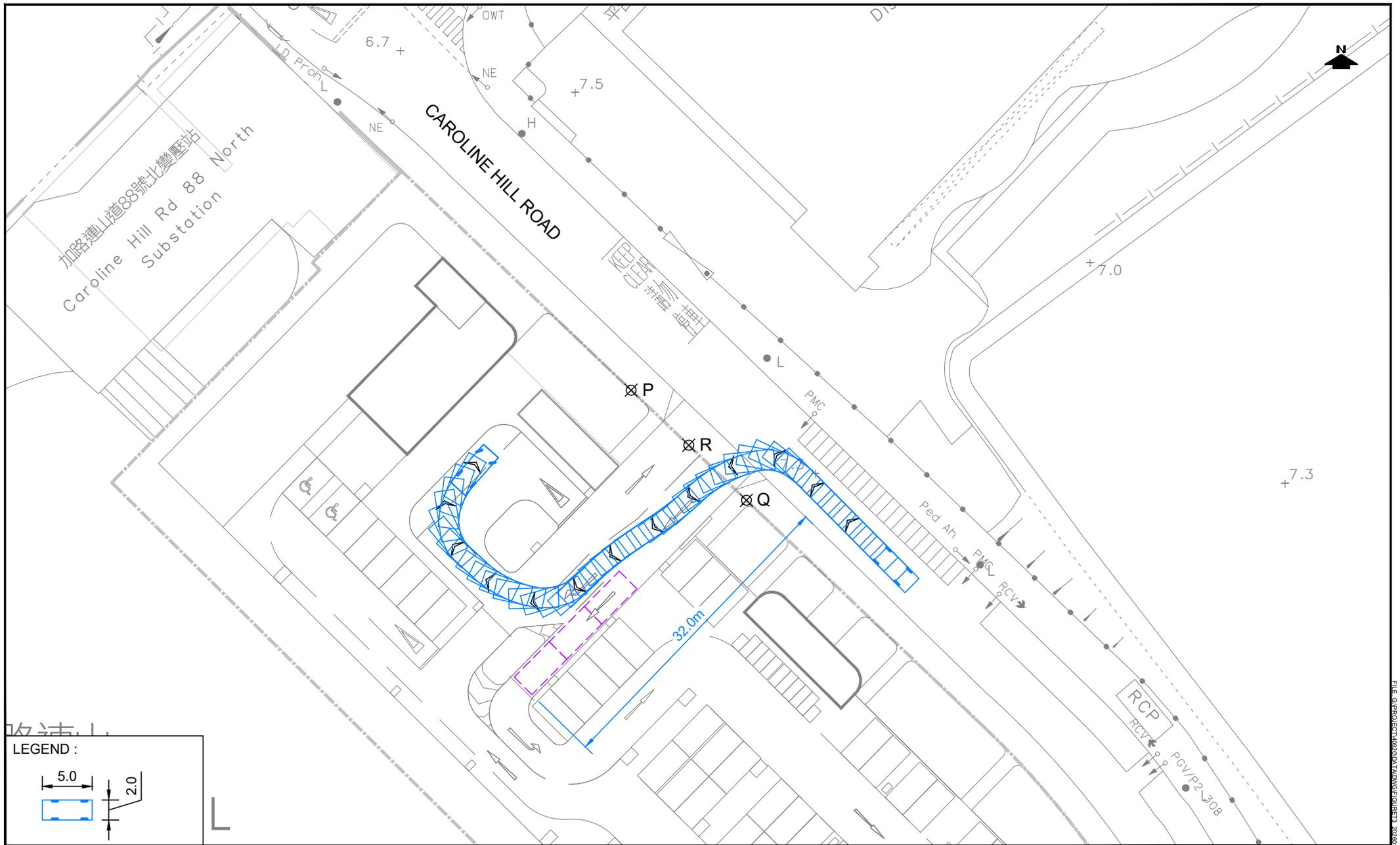
LEGEND :

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PROJECT NO.	40920
DESIGNED	SLN
DRAWN	CLL
CHECKED	SLN
DATE	JAN 2026
SCALE	1:500 @ A4

PROJECT TITLE	PROPOSED SCAA SPORTS LINK AT SOUTH CHINA ATHLETIC ASSOCIATION 88 CAROLINE HILL ROAD IN WONG NAI CHUNG
DRAWING TITLE	SWEPT PATH ANALYSIS - PRIVATE CARS AT RUN - IN / OUT

DRAWING NO.	FIGURE T2	REV.	.
LLA 顧問有限公司 Consultancy Limited			



PROJECT NO.	40920	
DESIGNED	SLN	DATE JAN 2026
DRAWN	CLL	SCALE 1:500 @ A4
CHECKED	SLN	

PROJECT TITLE	PROPOSED SCAA SPORTS LINK AT SOUTH CHINA ATHLETIC ASSOCIATION 88 CAROLINE HILL ROAD IN WONG NAI CHUNG	
DRAWING TITLE	QUEUING SPACES TO CAR PARK	

DRAWING NO.	FIGURE T3	REV.	.
顧問有限公司 Consultancy Limited			



LEGEND :

PROJECT NO.	40920	
DESIGNED	SLN	DATE JAN 2026
DRAWN	CLL	SCALE 1:500 @ A4
CHECKED	SLN	

PROJECT TITLE: PROPOSED SCAA SPORTS LINK AT SOUTH CHINA ATHLETIC ASSOCIATION 88 CAROLINE HILL ROAD IN WONG NAI CHUNG

DRAWING TITLE: **SWEPT PATH ANALYSIS - PRIVATE CARS**

DRAWING NO.	FIGURE T4	REV.	.
LLA 顧問有限公司 Consultancy Limited			



LEGEND :

PROJECT NO.	40920	
DESIGNED	SLN	DATE JAN 2026
DRAWN	CLL	SCALE 1:500 @ A4
CHECKED	SLN	

PROJECT TITLE	PROPOSED SCAA SPORTS LINK AT SOUTH CHINA ATHLETIC ASSOCIATION 88 CAROLINE HILL ROAD IN WONG NAI CHUNG	
DRAWING TITLE	SWEPT PATH ANALYSIS - PRIVATE CARS	

DRAWING NO.	FIGURE T5	REV.	.
LLA 顧問有限公司		Consultancy Limited	