

By Email and Hand

Our Ref: S3116/SCAA/23/008Lg

1 April 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. 5**

---

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 17 and 27 March 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   | Updated Traffic Impact Assessment  |
| Appendix II  | Replacement Pages of the Air Quality Impact Assessment                     |
| Appendix III | Replacement Pages of the Sewerage Impact Assessment                        |
| Appendix IV  | Drawings indicating the new/existing pedestrian route and vehicular access |

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

A handwritten signature in black ink, appearing to be 'Gladys Ng', written over a white background.

Gladys Ng

Encl. (4 copies)

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

PL/GN/vy

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><b><u>Comments from Transport Department:</u></b>  <b>(Contact Person: Mr Sammy WONG; Tel: 2829 5262)</b></p> <p>TD’s Comments on the R-to-C table and the revised TIA enclosed in the 4th Further information (FI) are as below:</p> <p>1) R-to-C item 1 – The supporting information of car parking ratio of 1 space per 497 m<sup>2</sup> GFA for the proposed development as incorporated in Section 2.4 of the updated TIA report is noted. Please also justify the L/UL demand.</p> <p>2) R-to-C item 2 and revised Figure 3.3 – It is assumed that 45.5% of generated pedestrian flow will be distributed to/from CWB MTR station and 48.8% to/from bus stops at Moreton Terrace. Please advise the basis of this assumption as it appears more pedestrian will access to CWB MTR station side in the past large scale events. Please review your distribution and assess the associated pedestrian impact.</p> <p>3) R-to-C item 3 &amp; revised Figure T1 – The swept path for the 11m HGV is in conflict with adjacent walkway when leaving the L/UL bay. Please review the internal layout design.</p>	<p>At present, there is no designated GV loading/unloading space provided at the existing SCAA main block. The loading/unloading activities are conducted by LGV within the carpark near the entrance area and the operation was found to be satisfactory. In the proposed development, 1 no. of HGV loading/unloading bay has been proposed to better serve the loading/unloading demand.</p> <p>Please be clarified that no large-scale event will be conducted in the proposed development. The proposed development will serve as a sports centre providing tennis courts and football pitches as well as supporting activities/multi-purposed rooms only and therefore, the pedestrian pattern will be different to the pattern under large-scale events.</p> <p>Noted. Please find the updated Figure T1 (Rev.A) in the attached.</p>

**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
4) R-to-C item 5 and Table 4.7 refer – please justify why adopting the largest trip rates among weekday AM and PM peak for the weekend peak is considered a conservative approach, in particular for “Retail” use.	The trip rates have been reviewed and updated. Please refer to Table 4.7 in <i>Appendix I</i> for details.
5) R-to-C item 6 refers – The traffic flow direction of Tung Lo Wan Road at the j/o Tung Lo Wan Road and Moreton Terrace in Figure 3.2 is incorrect. Please rectify.	Noted. Figure 3.2 has been updated accordingly.
6) R-to-C item 7 refers -	
(i) Please clarify why peak hour flow instead of peak 15-min flow is used in the LOS assessment.	Peak 15-min flow has been adopted accordingly. Please refer to <i>Appendix I</i> for details.
(ii) Regarding the section 4.11, please elaborate how the estimate average number of pedestrians waiting at the refuge island was derived and provide the results of space per person at Table 4.13.	Noted. An example has been provided to demonstrate how the estimated average number of pedestrians waiting at the refuge island was derived. Please refer to Section 4.11 in <i>Appendix I</i> for details.
(iii) Regarding Note (2) of Table 4.13, please note that the criteria for LOS should be referenced from Table 18-8 instead of Table 18-7 if HCM 2000.	Please note that the reference was checked and confirmed to be correct. An abstract of the HCM2000 has been appended in Appendix E for easy reference ( <i>Appendix I</i> refers).
7) 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 further discussion will be made with the owner of adjoining development and relevant government departments regarding land lease issue, maintenance liability and funding arrangement. Please allow provision for the proposed pedestrian	Noted. The provision for the proposed pedestrian linkage system will be allowed at the building plan stage.

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
linkage system in the building plan and future construction of the development.	
<p><b><u>Comments from the Director of Environmental Protection:</u></b>  <b>(Contact Person: Ms Virginia WONG; Tel: 2835 1109)</b></p> <ol style="list-style-type: none"> <li>1. Section 4.3.5 – <ol style="list-style-type: none"> <li>a. Please underline the section header.</li> <li>b. Since the AQIA is to evaluate the air quality impacts at ASRs instead of inside the carpark, please remove Table 4-3.</li> </ol> </li> <li>2. Section 5.1.1 – Please provide data of the nearest general AQMS instead of roadside AQMS.</li> <li>3. Section 5.1.2 – Please review if line 1 should read “operati<u>o</u>ning”</li> <li>4. Table 5-2 – <ol style="list-style-type: none"> <li>a. 10th max 24-hour RSP for (41,29) should be 52.<b><u>57</u></b>.</li> <li>b. Please remove the underline and bold for the no. of exceedance for 8-hr O3.</li> </ol> </li> <li>5. Section 7.3.2 and 7.3.3 – Please check whether “St. Paul’ s Hospital Main Block” should be “St. Paul’s <b><u>Hospital</u></b> Main Block”.</li> <li>6. Figure 6-2 to 6-6 – Please add a remark in the figure that there are no fresh air intake and openable windows of air sensitive use and open space for active recreation use within the buffer zone.</li> </ol>	<p>Section 4.3.5 has been revised accordingly (<i>Appendix II</i> refers).</p> <p>Data of the Central/Western monitoring station has been adopted in Section 5.1.1 (<i>Appendix II</i> refers).</p> <p>Section 5.1.2 has been revised accordingly (<i>Appendix II</i> refers).</p> <p>Table 5-2 has been revised accordingly (<i>Appendix II</i> refers).</p> <p>Section 7.3.2 and 7.3.3 have been revised accordingly (<i>Appendix II</i> refers).</p> <p>Figures 6-2 to 6-6 have been revised accordingly (<i>Appendix II</i> refers).</p>

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>7. Figure 6-7 – Please remove 5m road buffer distance in the legend.</p> <p>8. Please highlight all changes in the next submission.</p>	<p>Figure 6-7 has been updated accordingly (<i>Appendix II</i> refers).</p> <p>Noted.</p>
<p><b><u>Chief Engineer/Hong Kong &amp; Islands, Drainage Services Department</u></b> <b>(contact officer: Mr Keith WONG, tel.: 3101 2376)</b></p> <p>Regarding the revised SIA enclosed in 1st FI, the applicant is advised that as per DSD’s Corrigendum No. 1/2024 for Sewerage Manual Part 1, polyethylene (PE) pipes should be used for sewers with diameter not exceeding 375mm.</p>	<p>Please be clarified that the sewage generated from Proposed Development will be conveyed to the existing manhole FMH7019720 via existing 150mm diameter concrete pipe. No additional pipe work will be required for the Proposed Development. Please refer to <i>Appendix III</i>.</p>
<p><b><u>District Planning Officer/Hong Kong, Planning Department</u></b> <b>(contact officer: Mr Harvey LAW, Tel.: 2231 4929/ Mr. Michael SO, Tel: 2231 4992)</b></p> <p>(i) Please further clarify whether ancillary office is included in the proposed ancillary facilities</p> <p>(ii) Please provided relevant plans/drawings indicating the new/existing pedestrian route and vehicular access (including the existing main exit located in the SCAA Complex); and</p> <p>(iii) Please clarify whether the proposed landscape garden at primary zone</p>	<p>Yes, the proposed ancillary facilities include ancillary office.</p> <p>Please refer to drawings in <i>Appendix IV</i>. These show the new/existing pedestrian route and vehicular access (including the existing main exit located in the SCAA Complex).</p> <p>Yes, pedestrians can access and enjoy the proposed landscape garden at</p>

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
(on the G/F) can be accessed and used by the pedestrians.	primary zone (on the G/F) during operation hours of the proposed SCAA Sports Link.

Consolidated by: **KTA Planning Limited**

Date: **31 March 2026**

**List of Appendices**

**Appendix I** Updated Traffic Impact Assessment

**Appendix II** Replacement Pages of the Air Quality Impact Assessment

**Appendix III** Replacement Pages of the Sewerage Impact Assessment

**Appendix IV** Drawings indicating the new/existing pedestrian route and vehicular access



**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 - 11m HGV AT RUN - IN / OUT**

DRAWING NO.	FIGURE T1	REV.	A
-------------	-----------	------	---

**LLA** 顧問有限公司  
Consultancy Limited