

Attachment I

Response-to-Comments Table (Departmental Comment)

Responses to Comments – Departmental Comments

Comments from Related Departments Page No. Architectural Services Department, Architectural Branch, Advisory & Statutory Compliance Division, Development Bureau, Works Branch, Works Division 1, Commissioner for Heritage's Office, Antiquities and Monuments Office, Heritage Conservation Unit, Historical Buildings Sub-unit, dated 15 July 2025 2 Drainage Services Department, Operations & Maintenance Branch, Mainland South Division, Mainland Environmental Protection Department, Environmental Assessment Division, Territory South Group, Ma On Shan, Shatin, Kwai Chung, dated 7 July 2025 Food and Environmental Hygiene Department, Administration & Development Branch, Administration Hong Kong Police Force, Regions, Kowloon West Regional Headquarters, Traffic Kowloon West, 9. Lands Department, Lands Administration Office, District Lands Office, Tsuen Wan and Kwai Tsing, dated 10. Planning Department, District Planning Branch, Metro District Planning Division, Tsuen Wan and West 11. Planning Department, District Planning Branch, Metro District Planning Division, Tsuen Wan and West 12. Planning Department, District Planning Branch, Special Duties Division, Urban Design & Landscape 13. Planning Department, District Planning Branch, Special Duties Division, Urban Design & Landscape 14. Social Welfare Department, Headquarters, Planning & Development Branch, Project Planning Section 15. Transport Department, NT Regional Office, Traffic Survey & Support Division, Kwai Tsing Section, dated 17. Water Supplies Department, New Works Branch, Construction Division, System Planning Section, dated 7

<u>Responses to Comments – Departmental Comments</u>

COMMENTS FROM RELATED DEPARTMENTS

No.	Comments	Responses
1.	Architectural Services Department, Architectural Branch, Advisory & Statutory Compliance Division, dated 7 July 2025	
	1. Based on the information provided, it is noted that there is no change in the key development parameters of the proposal from the previous submission. From the photomontages, it is suggested for the applicant to better demonstrate on Figure No. 3 (Viewing Point 1: Kau Wa Keng Village Playground) the overall visual impact difference of the Approved Scheme and Proposed Scheme by showing full height of the proposed buildings, to enable us to provide comments from an architectural and visual impact point of view.	Please be advised that the Visual Impact Assessment in Appendix H aims to evaluate the potential visual impacts of the Indicative Scheme from selected viewpoints (VPs) accessible to the public. In accordance with TPB-PG 41, VP1: Kau Wa Keng Village Playground is selected to assess the short-range visual impacts to the users engaging in active recreational activities. By assessing the visual impact from 4 perspectives, namely "Visual Composition", "Visual Obstruction", "Effect on Public Viewers", and "Effect on Visual Elements/Resources", it is concluded that the visual impact of the Proposed Scheme to this VP would be negligible as compared with The Approved Scheme.
2.	Development Bureau, Works Branch, Works Division 1, Commissioner for Heritage's Office, Antiquities and Monuments Office, Heritage Conservation Unit, Historical Buildings Sub-unit, dated 15 July 2025	
	1. While AMO supports the preservation and adaptive reuse of all 12 Graded Buildings within the application site as committed by the Applicant, AMO would defer to PlanD's assessment on the viability of the proposed development scheme and heritage conservation proposal given the developer(s) and owners of the 11 Graded Buildings have yet to be identified.	Noted.
3.	Drainage Services Department, Operations & Maintenance Branch, Mainland South Division, Mainland South 7(Kwai Chung East, Contract & General Duties), dated 15 July 2025	
	1. Section 4.2.3 - Please justify how the assumption that 20% of the area is unpaved was made;	The percentage was made with reference to the latest design of the MLP. It is confirmed a reasonable assumption and will be a guideline for the future detail design.

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	2. Section 4.2.11 - Please elaborate on how provisions for progressively meeting end 21st century requirements could be implemented.	Revised. Please refer to Section 4.2.11 of the revised DIA report in Appendix E .
	SIA	
	1. RtC item (m) - Appendix G - The sewerage upgrading works would end at MB32 and connect to existing manhole FMH4009443 and the outlet pipe is smaller size (600mm dia.) which the pipe capacity would be reduced. The applicant should also demonstrate the sewerage impact up to the manhole FMH4009444.	The pipe connecting the MB32 and FMH4009443 is a bifurcating pipe that allows the flow from FMH4009442, FMH4009589 and FMH4009580 to share the downstream capacity. Due to the drainage box culvert that the sewerage pipes lay across, it is difficult to upgrade the downstream DN600 and DN375 pipes. However, a capacity check is made to the downstream DN1500 pipe, considering full bore capacity from FMH4009442, FMH4009589 and FMH4054163. Details can be referred to Appendix G part 3 of the revised SIA report in Appendix F .
4.	Environmental Protection Department, Environmental Assessment Division, Territory South Group, Ma On Shan, Shatin, Kwai Chung, dated 7 July 2025	
	1. EPD's detailed technical comments on the revised Environmental Assessment and revised Sewerage Impact Assessment are provided in Annex A.	
	Annex A - EPD's comment	
	Further Information (1) and (2) circulated by PlanD on 16 June 2025	
	EPD's Technical Comments	
	Environmental Assessment (Appendix C)	
	Waste and Land Contamination	
	1. Section 8.1.1.1 - In addition to the village house, please include other land uses within the Application Site as per the Site Survey Findings, such as the open storage area and the 格仔田.	Further elaboration has been supplemented in Section 8.1.1.1 of the updated Environmental Assessment (Appendix D).
	2. Section 8.4.1.1 & Appendix 8.4 – Please confirm if all six incidents occurred within	Based on FSD's reply, only the location for incidents No. 1 and 3 are known. The rubbish

No.	Comments	Responses
	the Application Site, including the Pumping Station.	fire in 2021 is located near lamppost No. AC0585 which is at the western portion of the site.
		The fire alarm incident is located at the Kau Wa Keng Pumping Station to the east of Castle Peak Road – Kwai Chung and is therefore outside the Application Site.
		Nevertheless, further enquiry has been sent to FSD and it is advised that further information on the exact location of the incidents is unavailable in FSD's records.
	3. Sections 8.3.1.1, 8.4.1.1 & Appendix 8.4 – There appears to be a contradiction in the findings. Please review and clarify.	
	(i) According to the information provided by the FSD, two rubbish fires occurred in the open ground near Kau Wa Keng San Tsuen in 2021 and 2024, respectively. Section 8.3.1.1 notes that oil drums were observed in the open storage area (i.e. an open ground), while abandoned electric cables and used detergent containers were found in the rubbish dumping area, which may also be classified as an "open ground". Therefore, the analysis in Section 8.4.1.1 stating that "waste generated are typically general household refuse which would not contain chemicals or dangerous goods" may not be valid.	The rubbish fire which occurred in 2021 is located near Lamppost No. AC0585 which is next to the pedestrian footpath (Location shown in Appendix 8.1 of the updated Environmental Assessment (Appendix D). Based on the 2021 aerial photo, the area near the incident location is mainly vegetated land. The "open ground" as indicated in FSD's response is in fact a vegetated area in the middle of the pedestrian footpath. Besides, previous site surveys have suggested that no land contamination potential is identified in that area of the Application Site. Therefore, no land contamination potential is associated with the rubbish fire incident in 2021.
		For the rubbish fire in 2024, FSD has advised that the exact location of the incident record is not available. Nevertheless, previous site surveys have suggested that only two potentially contaminated sites (i.e. the rubbish dumping area and open storage area) were identified within the Application Site. The other areas of the site are either concrete paved or vegetated areas which no potential land contamination issues were suspected. If the rubbish fire in 2024 is indeed located within the two identified sites, it would already be included in the identified areas with land contamination potential.

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		Paragraph 8.4.1.1 has been reviewed and revised in the updated Environmental Assessment (Appendix D).
	(ii) Also, the analysis in Section 8.4.1.1 stating that "potential leakage of chemicals brought by burning activities is not expected" may also be questionable. Although the exact locations of the open grounds are unidentified based on the information provided by the FSD, it is possible that the rubbish fires occurred in the area mentioned in Section 8.3.1.1, raising concerns about potential chemical leakage.	Please refer to response to RtoC Item No. 3(i). Paragraph 8.4.1.1 has been reviewed and revised in the updated Environmental Assessment (Appendix D).
	(iii) Given this context, further verification is necessary to confirm the location of the open ground and assess any potential land contamination associated with chemical exposure.	Please refer to response to RtoC Item No. 3(i). Paragraph 8.4.1.1 has been reviewed and revised of the updated Environmental Assessment (Appendix D).
	4. Section 8.5 – For better clarity, please indicate the potentially contaminated sites on the relevant drawing.	Figure 8.1 has been supplemented of the updated Environmental Assessment (Appendix D) to indicate the locations of the potentially contaminated sites.
	5. Appendices 8.1 & 8.4 – Since the rubbish fire in 2021 occurred in the open ground near Lamppost No. AC0585, please identify the open ground area in the 2021 aerial photos in Appendix 8.1 for clarity.	The location of Lamppost No. AC0585 has been supplemented in Appendix 8.1 of the updated Environmental Assessment (Appendix D). As confirmed on the Common Spatial Data Infrastructure (CSDI) portal, the lamppost is located next to the pedestrian footpath. The "open ground" is a vegetated area in the middle of the pedestrian footpath.
	6. Based on the comments above, please review and identify any additional potentially contaminated sites. If they are found, please update the relevant sections accordingly.	Review has been conducted, and no additional potentially contaminated sites are identified.
	Noise	
	7. We noted that the Consultant has confirmed to supplement noise impact assessment at detailed design stage and all planned fixed noise sources will be designed and installed	Noted.

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	to comply with the relevant fixed plant noise criteria under the HKPSG.	
	Water Quality	
	8. Please inform EPD on the construction schedule for the four phases of the proposed development before commencement of construction works, and the commencement date of the watercourse removal/ diversion prior to its commencement, as mentioned in section 10.3.4.1, since water quality monitoring station KW3 would be affected by the development.	Noted. EPD will be informed.
	Sewerage Impact Assessment (Appendix E)	
	9. Section 3.2 and Section 6.1.3 - In view of the anticipated interface issues between the proposed development and various ongoing/planned public sewerage projects, the SIA report is subject to update should there be any design change or programme mismatch, to address the latest sewerage settings as appropriate.	Noted.
	10. Section 5.3.2 - Considering the peak flow discharged to manhole FMH4009599 is for sewers, please adopt the peaking factor (including stormwater allowance) for sewers and revise the peak flow presented in the paragraph accordingly.	The peaking factor (including stormwater allowance) is considered. Please refer to Appendix F Part 2 Scenario 3 of the updated SIA in Appendix F .
	11. Section 5.3.3 - Section 5.3.3 indicates that sewage generated from the proposed development will be discharged from the proposed SPS to existing public manhole FMH4009607, which is inconsistent with Section 5.1.2 stating the discharge point at FMH4009609. Please review and revise.	Revised. Please refer to Section 5.3.3 of the updated SIA in Appendix F .
	12. 12. Section 5.3.3, Table 5.2 and Appendix F (Part 2) - The additional peak flow discharged from the proposed SPS to manhole FMH4009607 in scenario 2 quoted in Section 5.3.3 (0.148m3/s) does not tally with Table 5.2 and Appendix F (Part 2) (0.147m3/s). Please review and revise.	Revised. Please refer to Section 5.3.3 of the updated SIA in Appendix F .

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	13. Section 5.3.5 and Appendix G (Part 3) - EPD's previous comment (item 24) has not been properly addressed. Given the SIA report evaluates only the proposed development without accounting for all anticipated developments in the same catchment of existing downstream sewerage infrastructures mentioned in Appendix G (Part 3), the conclusion in Section 5.3.5 is non-exhaustive and misleading as the proposed development is not the sole variable to the future sewage flow received by the downstream sewerage infrastructures. Please remove the associated paragraphs and appendix regarding the impact assessment for downstream SPS in the SIA, for the avoidance of ambiguity.	The original Section 5.3.5 is deleted, while the Appendix G (Part 3) is updated in the updated SIA in Appendix F .
	14. Section 6.1.2 - EPD's previous comment (item 25) has not been properly addressed. The estimated total ADWF considering the proposed development (Scenario 3) in Section 6.1.2 (7,367 m3/day) is inconsistent with Section 5.2.1 and Table 5.2 (7,983 m3/day). Please review and clarify.	Revised. Please refer to Section 6.1.2 of the updated SIA in Appendix F .
	15. Appendix G (Part 2) - The DWFI system is designed to collect and convey polluted runoff from the concerned drainage catchment to the adjacent sewerage system. In addition to the sewage generated from the existing village houses, please also consider the flow from the upstream drainage system, which will also be collected by the DWFI system. The consultant may refer to the design peak flow of Kau Wa Keng DWFI SPS to estimate the flow received from the concerned DWFIs as a conservative assessment.	The flow from upstream catchments is considered, please refer to columns "Flow from Other Catchments", "Note for Flow from Other Catchments" and the reference note * under the table in Appendix G (Part 2) of the updated SIA in Appendix F .
5.	Fire Services Department, dated 15 July 2025	
	1. I reaffirm that the height restriction as stipulated in s.20 of Residential Care Homes (Elderly Persons) Regulation, Cap. 459A and s.19 of Child Care Services Regulations, Cap. 243A shall be followed. For Child Care Centre, please take note that in the case of a centre used for children	Noted. Please be advised that the proposed RCHEs are proposed within 24m measured from ground floor. It is planned that the Child Care Centre (CCC) will serve children under 3 years old and Special Child Care Centre (SCCC) will

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	under 2 years of age, no part of any centre premises shall be situated at a height of more than 12m.	serve children aged 2-6 years old in RPB. The locations for the CCC and SCCC are swapped, i.e. CCC relocates to 1/F and SCCC relocates to 2/F. Any part of CCC will be within 12m measured from ground floor in the revised MLP (Appendix B).
	2. In addition, for RCHE development, if the height restriction as stipulated in s.20 of Residential Care Homes (Elderly Persons) Regulation, Cap. 459A is taken into consideration, it could be relaxed subject to the compliance of specific fire safety requirements including the Building fire safety design and Management requirements for RCHEs to allow parts of RCHE used for dormitory purpose by residents to be situated at a height more than 24m above the ground floor. The condition details of the specific fire safety requirements could refer to the latest version of Code of Practice for RCHE.	Noted. Please be advised that the proposed RCHEs are proposed within 24m measured from ground floor.
	3. As no details of the emergency vehicular access (EVA) have been provided, comments could not be offered by this Department at the present stage. Nevertheless, the applicant is advised to observe the requirements of EVA as stipulated in Section 6, Part D of the Code of Practice for Fire Safety in Building 2011, which is administered by the Buildings Department.	Noted.
6.	Food and Environmental Hygiene Department, Administration & Development Branch, Administration Division, Planning & Development Section, dated 7 July 2025	
	1. Please note that our previous comments are still valid. Regarding the location of Refuse Collection Point (RCP) cum Public Toilet (PT), the site proposed in the original submission is preferable. However, if this is not feasible, an alternative location could also be considered, provided that it meets the following requirements:	Noted.
	i. Accessibility: Should be accessible from the main road and capable of	Noted.

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	accommodating all waste collection vehicles (WCVs) (e.g., 24-tonne grab lorry, 30-tonne compaction WCV, 30-tonne hook-lift truck) with sufficient maneuvering and loading space.	
	ii. Compliance: Should follow paragraphs 1(a) and (b) of our previous comments on PT and RCP design.	Noted.
	[The Handbooks for PT and RCP are attached in the email for your reference.]	
	Please also indicate the location of the PT on all relevant plans to avoid confusion.	The public toilet is proposed to be located at the covered play area on ground floor of block 14 in RPB (please refer to the updated MLP in Appendix B). The layout of public toilet to be provided in detail design stage.
7.	Home Affairs Department, Kwai Tsing District Office, dated 7 July 2025	
	1. We note that village representatives of Kau Wa Keng Village have submitted their views on the planning application to the Town Planning Board. Besides, Kwai Tsing District Council Members CHU Lai-ling, MH and KWOK Fu-yung, MH have recently been vocal and expressed concerns about the planning application.	Public comments received regarding this application have been summarised and fully addressed, please refer to Annex II for the response to public comments.
	2. Matters pertaining to rural affairs in Kau Wa Keng Village fall under the purview of the Tsuen Wan Rural Committee. Furthermore, it is observed that residents of Kau Wa Keng and those in the adjacent areas often utilise facilities in the surrounding vicinity, including those in Sham Shui Po District. We defer to the relevant authority to consult the appropriate parties for their views as necessary.	Noted.
8.	Hong Kong Police Force, Regions, Kowloon West Regional Headquarters, Traffic Kowloon West, Enforcement and Control Division, dated 7 July 2025	
	If the work involves any temporary control of vehicular and pedestrian traffic during the trial period, which requires any necessary	Noted.

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	comment from the Police, I would be grateful if you could furnish us a set of updated, specific and detailed submissions of TTA Plan, arrangements of lighting-signing-and-guarding of road works in order to facilitate further assessment by the Police.	
9.	Lands Department, Lands Administration Office, District Lands Office, Tsuen Wan and Kwai Tsing, dated 15 July 2025	
	Our previous land administrative comments remain valid.	Noted.
	2. Further, per item no. 4.2(a) of the RtC Table at Attachment 1 of FI(2), the applicant advised that sales and purchase agreement had been recently made for additional interests within the Application Site, while there is no change in the landholding schedule of private lots within the Applicant Site as tabled in Table 2.1 of the Supporting Planning Statement at Appendix A of FI(2) compared to that in the previous submission. We defer the applicant to ensure the accuracy of the content of the report. For the title of ownership, please note para. 2d of the previous departmental comment.	Please noted that Table 2.1 in the Supporting Planning Statement (Appendix A) has be updated to reflect the latest overall landholdings on the Application Site.
10.	Planning Department, District Planning Branch, Metro District Planning Division, Tsuen Wan and West Kowloon District Planning Office, dated 7 July 2025	
	As requested, please find attached the departmental comments of the captioned application for your response and further action. Other departmental comments, if any, will be sent to you upon receipt.	
	1. During the public consultation period, a number of indigenous villagers and local stakeholders claimed they were not consulted on the details of the subject application or land acquisition matters prior to or during the application stage, and they expressed grave concerns. The applicant should clarify whether consultations with indigenous villagers and local stakeholders occurred at any stage of the proposal's	The Applicant has consistently engaged with village representatives and local villagers with the intention to acquire the remaining private land within the Application Site. Since the approval of the planning application No. A/KC/489, the Applicant has communicated with the residents of the historic buildings regarding the acquisition of land and properties in order to conserve the heritage value at the Application Site in

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	development, particularly addressing the period between the approval of planning application No. A/KC/489 and the subject application.	a holistic manner. Furthermore, a sales and purchase agreement has recently reached for additional interests within the Application Site, which has resulted in increased land ownership for the Applicant at the Application Site (Please refer to Section 2.2 in the Supporting Planning Statement (Appendix A) for more details).
		Other than the ongoing communications around land acquisition, villagers and local stakeholders are well informed in advance of this planning application.
		During the S16 application process, we have ensured compliance with TPB PG-No. 31B, with reasonable steps undertaken by the Applicant to give notification to the current land owners of the Application Site before submitting the planning application, including (i) publishing notices in three specified local newspapers (namely Ming Pao, Wen Wei Po and China Daily) on 14 March 2025, and (ii) posting site notices in 3 prominent locations at the Application Site 2 weeks prior to the submission of the planning application.
		In addition, as part of the statutory s.16 planning application process, statutory public comment period has provided a formal consultation platform for the general public to provide comments on the application. Public comments received regarding this application have been summarised and fully addressed. Please refer to Annex I for the response to public comments.
	2. Regarding the RtC table for PlanD Comment #11, the applicant indicated that No. 43 Kau Wa Keng, which is partially owned by the applicant, will be included in the early phases of development to advance conservation works. The applicant is advised to provide details of these early conservation works and the proposed use or function of the historic building concerned.	In the interim scenario (Development of Phase 1A and Phase 1B), No. 43 Kau Wa Keng will be preserved in-situ. The main architectural features will be preserved and restored. As demonstrated in the LMP in Interim Scenario, the historic building will be integrated with the adjacent historical theme plaza. The future use of the historic building will be determined during the detailed design stage, subject to the progress

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		of land acquisition and negotiation with the villagers/ owners of the historic buildings.
	3. In addition to the Landscape Master Plan (LMP) and supplementary sections in Attachment V (LMP in Interim Scenario), the applicant is advised to consider providing additional artist's impressions or renderings to illustrate the interface between the early phases of the development and the village houses/ancestral halls/major pedestrian accesses of Kau Wa Keng Old Village and Kau Wa Keng San Tsuen under the interim scenario.	An additional artist's impression is provided in Figure 8c of the Supporting Planning Statement (Appendix A) to illustrate the interface between the early phases of the development and the village houses / ancestral halls / major pedestrian accesses along the northern boundary of Phase 1A.
	4. While the provision of social welfare facilities is noted in response to SWD's request, given the significant population increase from the proposed development, its impact on the provision of community facilities in the Kwai Chung Planning Area should be appropriately addressed in the relevant section(s) of the SPS.	Referring to Section 5.6 of the updated Supporting Planning Statement (Appendix A), the provision of social welfare facilities has been based on the following considerations: - The priority list provided by the SWD - The deficiencies of social welfare services in Kwai Chung, Lai Chi Kok and Cheung Sha Wan Planning Scheme Areas - The local demand of the additional population from the Proposed Scheme
	5. While Photo Angle 9 may not be easily accessible, a similar viewpoint along Castle Peak Road - Kwai Chung (see attached Photo Direction 1), which is more accessible, could provide an overview of the Kau Wa Keng valley. The applicant is advised to consider adding a viewpoint similar to Photo Angle 9 to demonstrate how the proposed development integrates with the surrounding context in a broader sense.	Please note that a new VP - Viewing Point 9: Castle Peak Road – Kwai Chung (near Wah Yuen Chuen) is added to the Visual Impact Assessment in Appendix H.
11.	Planning Department, District Planning Branch, Metro District Planning Division, Tsuen Wan and West Kowloon District Planning Office, dated 15 July 2025	
	1. LMP (Table 4.6 and Fig 1.14) – the provision of greenery area does not add up. Please rectify as appropriate.	The provision of greenery area for each phase have been reviewed and revised as appropriate. Please refer to the revised Table 4.6 and Fig 1.14. in the revised Landscape

No.	Comments	Responses
		Master Plan and Broadbrush Tree Survey (Appendix G)
12.	Planning Department, District Planning Branch, Special Duties Division, Urban Design & Landscape Section, Landscape Unit, dated 7 July 2025	
	1. Having review the RtoC and the deliverables, please note below our comments from landscape planning perspective:-	
	(a) Please note that our previous comments were not fully responded in the deliverable. Thus, our previous comments remain valid, and we provide additional comments by following the bullet points of RtoC as follows:-	Please refer to the responses to the comments below.
	Response to Comments (RtoC)	
	i. <u>Item(b)</u> — With reference to your response, it is noted that "We've carefully reviewed the development layout and existing tree conditions, retaining trees where feasible, including T001, T007, T008, T009, T101, T102, T106, T108, T114, T115, <u>T116</u> , T117, This brings the total number of retained trees to 27." However, referring to the Tree Survey Schedule under Appendix E (Landscape Master Plan and Broadbrush Tree Survey), it is observed that T116 is a Leucaena leucocephala which is undesirable species. Please review.	Noted. Upon further review, T116 (Leucaena leucocephala 銀合數) was identified as an undesirable species, has been excluded from the list of retained trees. The total number of retained trees has therefore been updated to 26. The relevant figures and tree assessment schedule in the revised Landscape Master Plan and Broadbrush Tree Survey (Appendix G) are revised accordingly to reflect this change.
	ii. <u>Item (c) – The Applicant is required to include the description and strategy for the provision of irrigation points in the relevant paragraphs or sections, ensuring that the irrigation points are suitably provided for the maintenance works of the soft landscape treatment under the landscape planning framework.</u>	The major irrigation system will include manual and automatic, the details of the drainage irrigation systems have been included in Section 4.4 in the revised Landscape Master Plan and Broadbrush Tree Survey (Appendix G).
	iii. <u>Item (h)</u> – It is noted that the term 'GS' refers to the plant sizes specified in the CEDD General <u>Specification</u> . The Applicant is advised to explicitly indicate	Noted. The term 'GS' has been taken out from the report and replace with the full term

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		in their submission that 'GS' refers to the CEDD General Specification, rather than just providing such information in the RtoC.	"General Specification" to improve the clarity.
	iv.	Item (k) - It is noted that 12 existing trees are proposed for transplantation. However, the provided figure indicates that 14 trees are marked for transplantation. Therefore, our comment remains valid. Additionally, it is observed that the proposed transplantation locations of the transplanted trees overlap with T007.	Referring to the revised Landscape Master Plan and Broadbrush Tree Survey (Appendix G), the total transplant tree nos. should be 11. The compensatory tree planting plan (Fig 1.4) has been revised as appropriate.
	V.	Item(l)(1) - Some major spot levels (i.e. the greening area and hard paved area rear of Block 12, the loading/unloading next to Block 13, the proposed courtyard next to Block 13, northern site boundary, etc.) are still missing in all drawings. Please review.	The spot levels for the hard paved areas and greening areas have been included in the landscape master plan (Figure 1.5) in the revised Landscape Master Plan and Broadbrush Tree Survey (Appendix G).
	vi.	Item(1)(2) — The description of the unknown white strips are still missing. Therefore, our comment remains valid. Please clarify the unknown white strips with appropriate legend. The Applicant is also advised to ensure all meaningful graphic symbols illustrated on the figure should be provided with legend.	The white strips refer to the outdoor furniture such as bench, seating for the landscape areas. The legend of the landscape master plan (Figure 1.5) has been updated in the revised Landscape Master Plan and Broadbrush Tree Survey (Appendix G).
	vii.	Item(1)(3) — It is noted that Figure 1.7 includes a portion of the proposed boundary treatment (green wall with stepped planter) for the eastern area adjacent to Block 13 and Block 14. However, upon referring to Figure 1.5a (Landscape Master Plan), differences are observed in the boundary treatment between the northern boundary and Block 12, and between Block 10 and the northern boundary, compared to the treatment shown in Figure 1.7, and it is observed that the boundaries are connected with the existing slope. Please illustrate the different edge treatment of the proposed scheme and how such	Noted. The proposed boundary treatments are tailored to address specific site conditions, ensuring they meet both landscape and infrastructure requirements. Along the eastern boundary adjacent to Block 13 and Block 14, a green wall with stepped planter is proposed due to the presence of an underground drainage diversion. This treatment provides adequate soil depth and growth space for tree and shrub planting while addressing the engineering constraints. For the northern boundary and the area between Block 10 and Block 12, where no underground utilities are present, the planting area allows sufficient soil depth for

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		treatment could be accommodated in the landscape setting.	tree and shrub planting. In these areas, a wire trellis system is proposed on the retaining wall to support climbers, enhancing greenery and visually integrating the boundary with the existing slope.
			Referring to the revised Landscape Master Plan and Broadbrush Tree Survey (Appendix G), the edge treatments are elaborated in Section 4.1.10. The extent of the green wall with stepped planter and wire trellis are illustrated in Figure 1.5 and the section drawings in Figure 1.7 and Figure 1.9.
	viii.	Item(1)(4) — The proposed stepped planter is missing in this drawing. Please clarify its omission. Additionally, the Applicant is advised to illustrate the area of the proposed stepped planter in the relevant drawing(s) and confirm whether the stepped planter will be integrated as part of the proposed treatment for the green wall in relevant drawing(s) and paragraph.	As per the above response mentioned, the proposed boundary treatment varies depending on site conditions and infrastructure requirements. A green wall featuring stepped planters is proposed along the eastern boundary adjacent to Block 13 and Block 14. This design ensures sufficient soil depth for the planting of trees and shrubs, addressing the soil depth limitations imposed by the underground drainage diversion. The edge treatments are elaborated in Section 4.1.10. The extent of the green wall with stepped planter is illustrated in Figure 1.5. in the revised Landscape Master Plan and Broadbrush Tree Survey (Appendix G).
	ix.	Item(1)(5) — With reference to Figure 1.5a, it is observed that only the swimming pool (item 4) area is proposed, and the water pond is still missing. The Applicant is advised that the water pond and swimming pool are distinct landscape features. Therefore, the Applicant should clearly indicate both treatments with separate legend numbers.	In addition to the swimming pools, an entrance water feature is located near the pumping station. A separate legend number has been added for this feature in the landscape master plan (Figure 1.5 in the revised Landscape Master Plan and Broadbrush Tree Survey (Appendix G)) to clearly distinguish it from the swimming pools.
	X.	Item(1)(6) – It is noted that "Both the kid's play area and the covered play area will include children's facilities. The kid's play area will feature slide, swing set, and climbing structure" Please also indicate in relevant paragraph (i.e. para. 4.1.4).	Noted. The kid's play facilities have been supplemented in Section 4.1.4. of the revised Landscape Master Plan and Broadbrush Tree Survey (Appendix G).

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	xi.	Item(m)(1) – Referring to Fig 1.7, some reference images of landscape features (i.e. green wall and stepped planter) were shown. The Applicant is advised to indicate the captioned landscape features and provide elaboration in the report.	Referring to the revised Landscape Master Plan and Broadbrush Tree Survey (Appendix G), edge treatments are elaborated in Section 4.1.10. The extent of the green wall with stepped planter and wire trellis are illustrated in Figure 1.5 and the section drawings in Figure 1.7 and Figure 1.9.
	xii.	Item (n) – Please provide the breakdown of the passive and active area of the Open Space.	Noted. A breakdown has been provided in Figure 1.13 .
	xiii.	Item (o) – Based on site inspection by this office dated 2025.5.16, it is observed that some details indicated in "Detailed Assessment for the Trees with High Value for Priority Preservation" are incorrect, including but not limited to species, size, and defect. The Applicant is advised to critically review the accuracy of the details provided.	The species of trees T079 and T084 have been reviewed and revised accordingly. Additionally, T047 and 1A-T061 were found to have fallen and were removed in April 2023.
	(b)	<u>Para. 4.1.3</u> – It is noted that informal seating is proposed for Landscape Plaza. However, the corresponding legend is missing in all the drawing(s).	Noted. The legend for stepped seating has been included in Figure 1.5 of the revised Landscape Master Plan and Broadbrush Tree Survey (Appendix G).
	(c)	<u>Para. 4.1.6</u> – It is noted that " <u>A large swimming pool is situated near the exterior areas of the clubhouse" However, with reference to Figure 1.5a, <u>five</u> swimming pools are proposed. Please clarify.</u>	Para 4.1.6 of the revised Landscape Master Plan and Broadbrush Tree Survey (Appendix G) has been revised as appropriate.
	(d)	Section. 4.2 – The Applicant is advised to indicate the proposed hard landscape materials of proposed children play area under this section.	Noted. The material for the children play area – EPDM is included in the Table 4.1 of the revised Landscape Master Plan and Broadbrush Tree Survey (Appendix G).
	(e)	The Applicant is advised to review the entire submission and critically assess the accuracy of the information presented.	Noted.
	Adv	risory Comments	
	2.	The Applicant is reminded that approval of s.16 application under Town Planning Ordinance does not imply approval of the site coverage of greenery requirements under BD's APP PNAP-152 and/or under	Noted.

No.	Comments	Responses
	lease. The site coverage of greenery calculation should be submitted separately to BD for approval.	
	3. The Applicant is reminded that approval of the planning application under Town Planning Ordinance does not imply approval of tree preservation/removal scheme under lease. Thus, the Applicant should seek comments and approval from relevant authority on the tree works concerned and/or compensatory/ replacement planting proposal, where appropriate.	Noted.
13.	Planning Department, District Planning Branch, Special Duties Division, Urban Design & Landscape Section, Urban Design Unit, dated 7 July 2025	
	Our observations/comments from urban design, visual impact and air ventilation perspectives are set out below.	
	Detailed Comments	
	2. Please be advised that paras. 11 and 14 provided previously shall remain valid.	Noted.
	3. Paras. 4.2.4.2, 4.5.1.3, 5.9.1.2 and Section 4.5.3 of SPS and para. 3.2.4.2 of VIA – It is noted from Item 4 of the R-to-C Table that the purpose of the three north-south-oriented 15m-wide visual corridors is for visual permeability. Please consider revising "enhancing the visual permeability" and/or "enhancing wind and visual permeability" to read as "allowing the visual permeability" and/or "allowing wind and visual permeability".	Noted. The paragraphs concerned are revised in the Supporting Planning Statement (Appendix A) and the VIA (Appendix H).
	4. Section 4.5 – It is noted from Item 6 of the R-to-C Table that the proposed green wall along the eastern site boundary is about 4m high. The Consultant may wish to include in Section 4.5 and annotate its height on Figure 1.7 of the revised Landscape Master Plan for the sake of clarity.	Noted. The height of the green wall has been indicated in Figure 1.7 of the revised Landscape Master Plan and Broadbrush Tree Survey (Appendix G).

No.	Comments	Responses
	5. Para. 4.5.2.2 – The Consultant may wish to provide legend for the proposed canopies on Drawing Nos. MLP-SK06-R5 and MLP-SK07-R5 for ease of reference.	Noted. Canopies are annotated in the concerned drawings and the legends in the MLP (Appendix B).
	6. Para. 4.5.3.1 – As commented previously, the Consultant may wish to supplement the 30m-wide tower setback on the eastern side of the Site near Lai King Hill Road for the sake of clarity.	Noted, the 30m high-rise block setback is supplemented in Para. 4.5.3.1 of the Supporting Planning Statement (Appendix A).
	7. Table 4.1 – It is noted from Item 5 of the R-to-C Table that the maximum site coverage of podium structures is 60%. The Consultant may wish to include the maximum site coverage of podium structures and floor-to-floor height of residential portions in Table 4.1 for the sake of clarity.	The maximum site coverage of podium structures and floor-to-floor height of domestic portion are added to Table 4.1 of the Supporting Planning Statement (Appendix A).
	8. Para. 5.9.1.1 – Please review/revise the ratings of the overall visual impacts to the identified public viewing points (VPs) as per our comments on VIA below.	Noted.
	Visual Impact Assessment (VIA)	
	9. Paras. 5.1.3.3, 5.1.3.4 and 6.1.1.2 – Please adopt the term "air path cum visual corridor" for the sake of consistency.	The related paragraphs are revised in the updated VIA (Appendix H).
	10. Figure 6 (VP4) – As commented previously, the proposed development should appear to be slightly taller. Part of the mountain backdrop and open sky view will be further obstructed by the proposed development.	Please refer to updated Section 5.1.5 of the VIA (Appendix H) for the visual appraisal of VP4.
	11. Section 5.1.5 (VP4) – According to the visual analysis for this VP, the proposed development intends to form "a stepped BH profile with the surrounding environment" with higher BH at 147.55mPD, and descending towards Nob Hill at 118mPD. Although the building separation would allow visual permeability among the residential towers, the increase in visual bulk would further obstruct the mountain backdrop and portion of open sky view in the middle of the background with reduced depth of view, which is currently underestimated in the photomontage.	The primary public view of VP4, characterised by a transition from the urban environment on the right to the natural landscape on the left will remain unobstructed under both Approved Scheme and Proposed Scheme. However, from the Proposed Scheme's increased BH would result in a larger visual bulk and reduce the depth of view to the mountain backdrop, subtly changing certain qualities of the public view in this VP. Therefore, the effects of the Proposed Scheme on public viewers are rated as slightly adverse. Please refer to

No.	Comments	Responses
	Therefore, in view of our comment in para. 11 above, para. 5.5.1 should be suitably updated and it would be more tenable to grade the "effect on public viewers" and "visual impact" to VP4 as "slightly adverse" rather than "negligible".	updated Section 5.1.5 of the VIA (Appendix H) for the visual appraisal of VP4. Overall, The higher BH of the Proposed Scheme will inevitably a larger visual bulk, slightly impeding the visual permeability to the mountain backdrop and slightly affecting the quality of the public view. However, the incorporation of building separations and a stepped building height profile will effectively mitigate the impacts from the visual bulk and maintain the overall visual character of a transition from the urban environment to the natural landscape. The open sky view remains as a significant visual component at this VP. Therefore, the visual impact to VP 4 is considered slightly adverse with the mitigation by design measures.
	12. Table 5.3 and Para. 6.1.1.2 – As per our above comments, please review/revise the ratings of the overall visual impacts to the identified VPs as appropriate.	Table 5.3 and Para. 6.1.1.2 are updated in the revised VIA (Appendix H) to reflect the update on VP4 and the additional VP9.
14	Social Welfare Department, Headquarters, Planning & Development Branch, Project Planning Section (Team 1), dated 15 July 2025	
	Please find SWD's comment as follows:	
	1. RCHE	
	The newly proposed social welfare facilities include a 100-p RCHE at Phase 1A, a 100-p RCHE at Phase 1B and a 150-p RCHE at Remaining Phase B. Subject to the consideration of the Town Planning Board and relevant government departments, we from service perspective generally have no objection-in-principle to the proposed RCHEs under S16 planning application, on the conditions that —	Noted.
	(a) The subject RCHEs shall incur no financial implication, both capital and recurrent, to the Government; and	Noted.
	(b) The design and construction of the RCHEs shall be in full compliance with relevant prevailing Ordinances, Regulations and Codes of Practice enforcing in Hong Kong	Noted.

No.	Comments	Responses
	and any licensing requirement issued by the SWD.	
	2. CCC	
	It is noted that the applicant has dropped the previously proposed 200-p CCC at Phase 1A and maintained the bid of 100-p CCC at Remaining Phase B. From service planning perspective, the limited intake population of about 19 000 in the subject private development do not substantiate the setting up of an aided 100-p CCC which has to be adhered to the population-based planning standard as stipulated in the HKPSG. Nonetheless, to enable market diversity in the supply of CCC places, we have no objection in principle to the applicant's proposal to incorporate a CCC if it will be operated on a self-financing mode with no financial implication, both capital and recurrent, to the Government. In this regard, the applicant is reminded to make reference to the service information on SWD website and consult the Child Care Centres Advisory Inspectorate of SWD for the registration requirement of a CCC and revise/update the information in relevant documents of the 1st and 2nd FI.	Noted.
	3. OPRS	
	For Traffic Impact Assessment (TIA) (Appendix H), Table 3.3.5 (P.20 of the pdf) and Table 3.3.6 (P.21 of the pdf), "Private Car Parking Space", "Accessible Parking Spaces", or "L/UL bay for LGV" is NOT required for OPRS. Whilst, the "Parking Space for private light bus" for OPRS should be retained.	The provision of L/UL spaces are revised on the updated MLP (Appendix B) and Traffic Impact Assessment (Appendix C).
	[7m x 3 5m x 3 6m] Cat Parking Space - 3 (OPRS) 1 (RCHE) 4	
	(5m x 5 5m x 2 4m) Accessable Parking Spaces - 1 (RCHE) 1 (OPRS) 1 (RCHE) 2	
	Private cur taxa pick-up (drop-off space	
	1 (RCHE) 1 (PRES) 1 (RCCC) 4	
	Clum x mm x x mu Shared-me L/UL haw	

No.	Comments	Responses
	Neighbourhood Elderly Centre (NEC) NA Ni A	
	• Please be reminded that the dimensions for one parking space for the parking of a private light bus as mobile training centre of OPRS should be 8m L x 3m W x minimum 3.3m headroom.	Noted. A remark is supplemented in the table header of Table 3.3.5 in Traffic Impact Assessment (Appendix C).
	Convenient access to shared public loading/unloading bay or lay-by for ambulance should be available for OPRS.	Noted.
	• It is noted from the Master Layout plan (App B), the proposed location of OPRS is in the close proximity of the proposed refusal collection point, the refusal vehicles parking space and the basement carpark ramp. The possible nuisance caused by noises, fumes or obnoxious smells should be avoided for service unit serving vulnerable pre-school children with training facilities. For the consultant/ architect to review please.	As mentioned in Section 7.3.1.3 of the EA report (Appendix D), it is recommended to provide proper ventilation, deodourising (e.g. with 95%odour removal efficiency) and exhaust system for the refuse collection point. Good site practices have also been recommended to enhance the hygiene of the refuse collection point by frequent washing, proper covering of refuse bins, closing of roller shutters and proper maintenance of the ventilation, deodourising and exhaust systems. No adverse air quality and odour impacts are anticipated for nearby Air Sensitive Receivers (ASRs).
		Besides, Section 5.5 has suggested that all planned fixed noise sources shall be designed to comply with the requirements under the HKPSG in detailed design stage. No adverse noise impacts are anticipated for nearby Noise Sensitive Receivers (NSRs) with the implementation of the recommended noise mitigation measures.
		Since the OPRS would have a further separation distance to the refuse collection point than the existing village houses to the north (7m) and planned residential block 2 to the east (19m) of the refuse collection point, adverse environmental impacts on the OPRS are also not anticipated.

No.	Comments	Responses
	RESIDENTIAL CARE HOME FOR THE ELDERLY (100 PLACES) HOME CARE SERVICES FOR FRAIL ELDERLY PERSONS (4-TEAM SIZE NON-KITCHEN BASED) WATER WORKS RESERVE WITH MIN. 10m VERTICAL CLEARANCE ABOVE FROM GROUND OFFICE BASE OF ON-SITE PRE-SCHOOL REHABILITATION SERVICES (CAPACITY:125) 120-PLACE DAY CARE CENTRE FOR THE ELDERLY (DE) (NON-KITCHEN BASED)	
	Application for Permanon Horizon Charles and Common Francisco Compenhencia Compenhe	
	4. HCS for Frail Elderly Persons	
	• Referring to Table 3.3.5 of Appendix H (i.e. Traffic Impact Assessment), it is noted that "Shared-use loading / unloading bay for Heavy Goods Vehicles (i.e. "HGV") and private light bus (11m x 3.5m x 4.7m)" is arranged for HCS for Frail Elderly Persons.	The provision of L/UL spaces are revised on the updated MLP (Appendix B) and Traffic Impact Assessment (Appendix C).
	• Kindly note that for HCS for Frail Elderly Persons, the use of shared loading/ unloading involves transportation services for frail elderly service users including wheelchair users. From the service perspective, shared loading/ unloading with HGV is not preferred due to safety concerns. To recapitulate, it is most preferable for the loading/ unloading area for private light bus to be shared with other	Noted, one designated parking space for private light bus with dimension 8m x 3m with minimum headroom of 3.3m; and one shared loading/unloading area for the private light bus and other welfare facilities with dimension of 11m x 3.5m x 4.7m are proposed for the HCS for Frail Elderly Persons.

No.	Comments	Responses
	welfare facilities. Please further review and revise.	
	 Additionally, the abbreviation of Home Care Services for Frail Elderly Persons should be HCS for Frail Elderly Persons, instead of HCS, please revise accordingly. 	Noted and revised accordingly.
	5. NEC	
	No further comment on the RtC Table.	Noted.
	6. SCCC	
	• For Traffic Impact Assessment (Appendix H), Table 3.3.5 (P.20) and Table 3.3.6 (P.21), please remove the provision of "Loading/ unloading bay for LGV (7m x 3.5m x 3.6m)" for SCCC while the "Parking Space for 48-seater coach (12m x 3.5m x 3.8m) x 1" and "Loading/ unloading bay for 48-seater coach (12m x 3.5m x 3.8m) x 1" should be retained.	Noted.
	• For the dimensions for parking space and L/UL bay for 48-seater coach, to make it clear, please review to "(12m L x 3.5m W x minimum 3.8m Headroom)".	Noted. A remark is supplemented in the table header of Table 3.3.5 in Traffic Impact Assessment (Appendix C).
	7. 60-P DE	
	We have no further comment as the 60-p DE was removed.	Noted.
	8. School Social Work Office (SSWO)	
	While other information directly related to the School Social Work Office (SSWO) are checked in order, please help amend that the population for the SSWO should be 41staff members plus service users in the Appendix F: Sewage Impact Assessment - Part 1 on page 3 of 5 as extracted below for easy reference.	Revised. Please refer to Appendix F Part 1 n the revised SIA (Appendix F). The relevant calculation is updated and revised accordingly.

Responses to Comments – Departmental Comments

No.	Comments	Responses
	■ AXC,511,FLeumentpdf □ ② R© □ ② RE □ □ ② RE □ □ ② RE □ □ □ □ □ □ □ □ □ □ □ □ □ □ □ □ □ □ □	
	For School Social Work Office, it is a service centre with population for 41 staff and service users.	
	CDA Development France CDA Development C	
15.	Transport Department, NT Regional Office, Traffic Survey & Support Division, Kwai Tsing Section, dated 15 July 2025 Please find our comments on the TIA below:	
	1. Figure 3.3_2 refers. While this proposed pedestrian crossing and bus stop relocation scheme is more preferable from pedestrian safety point of view compare to that in Figure 3.3_1, the proposed vehicular access of Phrase P1A is located very close to the pedestrian crossing. Please assess its impact to the signalized crossing and the carriageway. Please carry out assessment for development scenario including but not limited to the following:	The proposed pedestrian crossing and bus stop relocation scheme have been reviewed, please refer to Figure 3.3 of the revised TIA report (Appendix C) for the proposed traffic arrangement. The proposed signalised crossing has been assessed, please refer to Table 4.5.1 and Table 5.2.1 of the revised TIA report (Appendix C) for the junction performance of the proposed signalised crossing of the design, and interim assessment scenario.
	(a) P1A only	
	(b) P1A + P1B	
	(c) $P1A + P1B + RPA + RPB$	
	2. Section 3.2.2 and Figure 3.3_2 refers. Please provide a more detailed drawing for the proposed scheme. Please also provide the swept path analysis for the vehicular access in this scheme.	The proposed pedestrian crossing and bus stop relocation scheme have been reviewed, please refer to Figure 3.3 and Figure 3.4 of the revised TIA report (Appendix C) for the proposed traffic arrangement and swept path analysis for the vehicular access.
	3. Table 4.5.1 refers. The RC for J3_c is	Please be clarified that the traffic associated

reduced by 4% in PM peak for 2035

reference scenario compare with 2035

design scenario while the RC in AM peak

remain the same for both 2035 design

with proposed development distributes to

different arms at the concerned junction in

the morning and evening peak hours. Since

the morning traffic does not distribute to the critical arm of the junction, the RC in the AM

No.	Comments	Responses
	scenario and 2035 reference scenario. Please review or clarify.	peak remains the same, whereas the evening traffic distributes to the critical arm of the junction, the RC in the PM peak drops in the design scenario.
	4. Swept path of 12m coaches in Appendix C refers. It is noted that the swept path encroaches opposite lane. Please propose traffic management measures to avoid traffic impact to the public road.	The vehicular access arrangement has been reviewed, please refer to Figure 3.4 of the revised TIA report (Appendix C). The swept path of 12m coaches will not encroaches opposite lane, thus no adverse traffic impact to the public road in anticipated.
	5. The proposed vehicular access at P1B appears to span over an access of a DSD facilities. Please clarify whether there will be a bridge structure and its management and maintenance responsibility. TD will not take up the management responsibility of the proposed structure.	Please be advised that vehicular access at P1B is no longer proposed, please refer to Figure 3.2 of the revised TIA report (Appendix C) for the proposed vehicular access arrangement.
	6. R-to-C item no.6 refers. It is noted that the proposed improvement works for J3 is proposed to be carried out before the completion and population intake of Phase 1A of the Application Site. In this case, please review the junction capacity when any of the individual phase are completed. In the previous TIA submitted for planning application no. A/KC/489, the proposed junction modification work is intended to be carried out before the completion and population intake of any phase of the Application Site.	According to the revised TIA report (Appendix C), the proposed improvement works for J3 will not be necessary with the implementation of the government planned improvement works. Please refer to the junction performance of J3_b in Table 4.5.1 of the revised TIA report (Appendix C). Implementation of the approved junction improvement scheme in the planning application no. A/KC/489 should be subject to traffic review in the later stages.
	7. Comments from TranO Division will be further provided.	Noted.
16.	Transport Department, Transport Operation Division, dated 18 July 2025	
	It is understood that there will be updates on the R-to-C regarding the on-street bus stop. Our side will provide comments on the updated version when it is available.	Noted.
17.	Water Supplies Department, New Works Branch, Construction Division, System Planning Section, dated 7 July 2025	

<u>Responses to Comments – Departmental Comments</u>

No.	Comments	Responses
	2. Regarding RtC of WSD Comment #5, the applicant shall submit the latest MLP to WSD for review and comment in the detailed stage of project.	Noted.

(Last updated 25 September 2025)