
From: December Huang [REDACTED]
Sent: 2025-09-04 星期四 18:13:04
To: Shirley Ka Kei CHAN/PLAND <skkchan@pland.gov.hk>
Subject: Re: A/NE-HLH/85 - departmental comments

Re: DD 84, Lot 529 S.A — Response to Departmental Comments

We refer to the departmental comments received in respect of the captioned planning application. Our consolidated responses are provided below for the Board's and departments' consideration.

A. Director of Environmental Protection (DEP)

A1. Mobile toilet and sewage disposal

The proposed mobile toilet will be a sealed-unit chemical toilet. All effluent will be contained within an integral holding tank; **no discharge to ground, drains, watercourses or surrounding land will occur**. A **licensed waste contractor** will be appointed to provide routine servicing and off-site disposal to approved facilities. Key management measures are as follows:

- **Servicing frequency:** at least **once per week** in normal operation (and immediately if levels approach 80% tank capacity).
- **Records:** we will keep **service logs and disposal receipts** on site for inspection.
- **Spill prevention:** the unit will be placed on a **level, hardstand base** with bunded trays; absorbent materials and a spill kit will be maintained on site.
- **Compliance:** operations will adhere to the **Water Pollution Control Ordinance** and relevant EPD/FEHD requirements for mobile sanitary facilities.

A2. Material for filling of land

The Site proposes a **minor, uniform surface levelling** of **~0.1 m** over the existing ground for safety and dust control. The specification is:

- **Material:** **clean, inert granular fill** (e.g., well-graded sand/crushed fines; max particle size \leq 50 mm); **no construction/demolition waste** or contaminated material will be used.
- **Method:** geotextile separator (where needed) over existing surface, then 0.1 m of **permeable** granular fill lightly compacted to provide a stable, free-draining surface.
- **Purpose:** housekeeping only; **no change to natural drainage patterns** and no interference with existing watercourses.

B. Chief Town Planner / Urban Design & Landscape (PlanD)

B1. Compatibility and existing trees

We note PlanD's observation that the area is rural inland plains with mixed uses and that the proposed temporary use is not incompatible. Within the Site, **existing boundary trees will be preserved**. The applicant confirms **no tree felling** is involved.

B2. Tree impact and mitigation under 0.1 m filling

Although the proposed fill is shallow, we will implement the following **tree protection method statement** to avoid adverse impacts:

1. **Baseline & supervision**

- Undertake a **tree tally and condition check** prior to works (species, DBH, condition), led by an experienced landscape practitioner/arborist.
- **Arboricultural supervision** during initial setup and at key stages of works.
- 2. **Tree Protection Zones (TPZs)**
 - Erect **rigid protective fencing** around each retained tree prior to works (indicatively at **12× DBH** or a **minimum 1.5 m radius** from the trunk where space is constrained).
 - **No storage, mixing, parking, or refuelling** inside TPZs; ground levels at the stem/root flare will **not be raised**.
- 3. **No-dig, root-friendly surface near trees**
 - Within TPZs and within **1.0 m of any trunk**, **no fill** will be placed.
 - Where level transitions are needed near roots, adopt a **no-dig build-up**: geotextile over existing grade, **cellular confinement or timber edging**, and **free-draining granular topping** (no concrete/asphalt).
 - Maintain **permeability and aeration**; ensure finished levels **do not cover buttress roots** or bark.
- 4. **Execution controls**
 - **Hand tools only** for works within TPZ perimeters; no excavation for the 0.1 m surface levelling.
 - **Avoid trenching** within TPZs; any unavoidable service runs will be **micro-routed outside TPZs**.
 - Provide **temporary surface drains** to prevent ponding around trees; maintain the existing overland flow paths.
- 5. **Maintenance & compensatory planting**
 - **Watering** during the establishment/operation period and remedial pruning only if required for safety.
 - Should any tree be unexpectedly and unavoidably affected, we will propose **like-for-like compensatory planting** on-site (or at locations agreed with departments), with species typical of the surrounding landscape.

B3. Clarification on tree impact

Given the above, the **0.1 m permeable topping** and **no-dig protocol** will not adversely affect existing trees.

C. Summary of Commitments

- **No effluent discharge; licensed collection** of sanitary waste from the mobile toilet with **service logs and receipts** kept on site.
- **Clean, inert, permeable fill** at **~0.1 m** for housekeeping and safety; no change to natural drainage.
- **No tree felling; TPP and no-dig measures** to protect existing boundary trees; **arboricultural supervision** at key stages; **compensatory planting** if ever required.

We trust the above addresses the departments' concerns. Should further particulars (e.g., the TPP sketch, servicing contract particulars, or materials data sheets) be required, we will provide them promptly.

Yours faithfully,

December Wong

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