

Table of Contents

1.	Environmental Protection Department	1
2.	Water Supplies Department	9
3.	Drainage Services Department	9
4.	Agriculture, Fisheries and Conservation Department	12
5.	Lands Department	12
6.	Fanling, Sheung Shui & Yuen Long East District Planning Office, Planning Department	13
7.	Transport Department	22
8.	Highways Department	38
9.	Urban Design Unit, Planning Department	39
10.	Landscape Unit, Planning Department	40
11.	Fire Services Department	41
12.	Architectural Services Department	42
13.	Buildings Department	42

	Departmental Comments	Responses to Comments
1.	Comments from Environmental Protection Department	
	<u>Planning Statement</u>	
1.1	Section 9.2.4: In view of the comments on the SIA report, please propose the respective upgrading works on the downstream sewer which identified over capacity.	Section 9.2.4 of the Planning Statement has been revised to tally with the latest findings in the revised Sewerage Impact Assessment (SIA). Please refer to the replacement pages of Planning Statement under Appendix A .
	<u>Environmental Assessment Report</u>	
	<i>Air Quality</i>	
1.2	Section 2.2: Please include the discussion of the buffer distance requirements for different emission sources in HKPSG.	The discussion of the buffer distance requirements for different emission sources in HKPSG has been supplemented in Section 2.2.10-2.2.11. Please refer to the revised Environmental Assessment (EA) under Appendix B .
1.3	Table 2.1: Please revise last column's header as "Number of exceedances allowed per calendar year."	Table 2.1 has been revised accordingly. Please refer to the revised EA under Appendix B .
1.4	Section 2.2.8: On the 1 st line, "Air Pollution Control (Fuel Restriction) Regulation" should read "Air Pollution Control (Fuel Restriction) Regulations". Please revise.	Section 2.2.8 has been revised accordingly. Please refer to the revised EA under Appendix B .
1.5	Table 2.2: Please revise last column's header as "Maximum Concentration (ppm)".	Table 2.2 has been revised accordingly. Please refer to the revised EA under Appendix B .
1.6	Table 2.3: <ul style="list-style-type: none"> - Please provide assessment heights for the ASRs. - Please review whether the land use of ASR A4 is G/IC. - Please consider the village-type house west of Shui Ming Villa as an ASR. 	Table 2.4 has been updated accordingly: <ul style="list-style-type: none"> - The assessment heights for the ASRs have been added. - Land use of ASR A4 has been revised to G/IC. - Village house west of Shui Ming Villa has been identified as ASR. Please refer to the revised EA under Appendix B .

	Departmental Comments	Responses to Comments
1.7	<p>Table 2.4:</p> <ul style="list-style-type: none"> - Please confirm whether the values of annual FSP exceeded AQO. - Please add a note to explain the meaning of the numbers in the brackets in the column AQO. 	<p>Table 2.5 has been updated accordingly:</p> <ul style="list-style-type: none"> - The values of annual FSP exceeded AQO. - Numbers in brackets is the number of exceedances allowed per calendar year. Note (c) has been supplemented under Table 2.5. <p>Please refer to the revised EA under Appendix B.</p>
1.8	<p>Table 2.5:</p> <ul style="list-style-type: none"> - Please bold the value of peak season O3. - Please revise note (a) as “Numbers in brackets is the number of exceedances allowed per <u>calendar</u> year.” 	<p>Table 2.6 has been updated accordingly. Please refer to the revised EA under Appendix B.</p>
1.9	<p>Section 2.5.3: Please delete this paragraph.</p>	<p>The original Section 2.5.3 has been deleted. Please refer to the revised EA under Appendix B.</p>
1.10	<p>Section 2.6.1: Please review whether this sentence is related to industrial or vessels emission and consider to move it to Section 2.6.3. Please note that vehicular emissions are relevant emissions in the vicinity of the application site.</p>	<p>The original Section 2.6.1 has been removed to avoid confusion. Please refer to the revised EA under Appendix B.</p>
1.11	<p>Section 2.6.2:</p> <ul style="list-style-type: none"> - Please rewrite the second sentence for better readability. - Please confirm whether a chicken farm exists south of Casas Domingo Block 29. If it does, please review its odour impact. 	<p>Onsite surveys have been conducted in October 2024, June 2025 and October 2025 to further verify the potential odour sources. From the most recent site visit conducted on 15 October 2025 (between noon to 2pm, 32.8°C air temperature and 73% relative humidity) to verify the potential odour sources, no identifiable odour were detected at the boundary of the RCP located at the southeast of the Application Site and the chicken farm located to the south of Casas Domingo Block 29.</p> <p>Section 2.6.1 has been revised. Please refer to the revised EA under Appendix B.</p>
1.12	<p>Section 2.6.2 and 2.6.3: Please provide the specific dates of the site surveys.</p>	<p>Specific dates of the site surveys have been provided in Section 2.6.1 and Section 2.6.2. Please refer to the revised EA under Appendix B.</p>

	Departmental Comments	Responses to Comments
1.13	Section 2.6.4 and RtC#5.7: Please provide TD's confirmation regarding the classification of the roads.	TD's confirmation regarding the classification of the roads will be provided once available.
1.14	Figure 2: Please show the assessment area for AQIA and overly the PATH grid.	Figure 2 has been updated accordingly. Please refer to the revised EA under Appendix B .
1.15	Figure 5: Please also compare the layout of other representative floors of the Proposed Development e.g. G/F to show its compliance with the buffer distance requirements i.e. no fresh air intake and openable windows of air sensitive uses and no facilities that will encourage the populations to stay within the buffer zone.	Please refer to Figures 5a and 5b in the revised EA under Appendix B .
	<i>Noise</i>	
1.16	Section 3.3.3 and Appendix 2 (RtC #5.13): TD's agreement on the traffic flow data is yet to be provided. Should TD only express no comment on the methodology for the traffic forecast, please provide confirmation from respective competent party (e.g. traffic consultant) that the TD's endorsed methodology has been strictly adopted in preparing the traffic forecast and hence the validity of the traffic data.	Reply from TD on the methodology adopted for the traffic forecast and the confirmation letter from traffic consultant on the validity of the traffic data will be provided once available.
1.17	Road Traffic Noise Model: <ul style="list-style-type: none"> - The percentage of heavy vehicles for some roads does not match the figure provided in Appendix 2. Please review. - Please verify that all the public roads within the assessment area are included. Please also review the road surface of all road segments particularly Kwu Tung Road and DSD access road. - Please provide the supporting road data for heights and widths used for roads such as Fanling Highway and Kwu Tung Road. - The roads near the intersection of Kwu Tung Road and Kam Hang Road do not align with the updated Traffic Noise Mitigation Plan. In this connection, please review and update the widths and alignment for all road segments. 	Please refer to the revised EA under Appendix B for the following amendments: <ul style="list-style-type: none"> - The percentage of heavy vehicles for road segment 3 (AM flow) and road segment 6 (PM flow) have been revised. - All the public roads within the 500m assessment area have been included, except for minor road carriageways (i.e. access roads of village houses near Hang Tau Road and DSD access roads near Sheung Yue River), which are either with very little traffic volume or with limited access. The impact derived from these minor road carriageways is considered insignificant. - The referenced road model data has been provided in Appendix 2. - The roads near the intersection of Kwu Tung Road and Kam Hang Road have been updated in noise model. - Figure 6 has been revised.

	Departmental Comments	Responses to Comments
	- The locations and ID numbers of some NAPs are not found in Figure 6 of the report. Please review and revise for consistency.	
1.18	Section 3.3.3: Please state in the report whether year 2047 is the year with maximum traffic projects within 15 years upon occupation of the proposed residential development and clarify in the report whether the morning peak hour traffic data represents the worst-case scenario for the assessment.	Section 3.3.3 has been revised accordingly. Please refer to the revised EA under Appendix B .
1.19	Section 3.5.1 and Figure 6 (RtC#5.15): The term "representative NSRs" should be replaced as per the earlier comment. Furthermore, please clarify what "selected storey" in Section 3.5.1 is referring to.	Figure 6 has been updated accordingly. The term "selected storey" in Section 3.5.1 has been removed to avoid confusion. Please refer to the revised EA under Appendix B .
1.20	Sections 3.7 and 3.8: Please consider to delete "the proposed NSRs" to avoid confusion.	Sections 3.7 and 3.8 have been revised accordingly. Please refer to the revised EA under Appendix B .
1.21	Section 8.1.3 (RtC #5.14): The discussion on fixed noise sources shall be expanded to include discussion of the planned fixed noise sources associated with the development itself, for completeness.	Section 8.1.4 has been revised include discussion of the planned fixed noise sources associated with the development itself. Please refer to the revised EA under Appendix B .
1.22	Figure 6: The proposed residential towers have different layouts for different floors. Please indicate the locations of all NAPs on their corresponding floor plans.	Figure 6 has been revised accordingly. Please refer to the revised EA under Appendix B .
	<i>Water Quality</i>	
1.23	Table 6.1: The status is blank for WSR2. Please update.	The status has been supplemented in Table 6.1. Please refer to the revised EA under Appendix B .
1.24	Section 6.3.6: Please note that ProPECC PN 1/94 has been superseded by ProPECC PN 2/24.	Section 6.3.6 has been revised accordingly. Please refer to the revised EA under Appendix B .
1.25	Page 24: Please remove the extra "Section 7".	The extra "Section 7" has been removed. Please refer to the revised EA under Appendix B .

	Departmental Comments	Responses to Comments
	<i>Waste Management</i>	
1.26	Section 7.2.1: Please review whether the “Monitoring of Solid Waste in Hong Kong” and “ProPECC on Handling of Asbestos Containing Materials in Buildings” is up-to-date.	Year of “Monitoring of Solid Waste in Hong Kong” has been revised. Please refer to the revised EA under Appendix B . Irrelevant references “Code of Practices and Guidelines for Asbestos Control and Handling” and “ProPECC PN2/25 Handling of Asbestos Containing Materials in Building” have been removed to avoid confusion.
1.27	Section 7.3.1: As EIAO-TM is quoted, please clarify whether the project is a designated project.	This project is not a designated project. The quoted EIAO-TM has been removed to avoid confusion. Please refer to updated Section 7.3.1 in the revised EA under Appendix B .
1.28	Section 7.4: Please review whether land-based sediment would be anticipated during the excavation of basement. If affirmative, please review the handling and management of the sediment.	A section for land-based sediment and site geological profile has been supplemented in Sections 7.4.18 to 7.4.20. Please refer to the revised EA under Appendix B .
1.29	Section 7.4.9: Please review the “threshold” value of 59,400 m ³ as it is not in line with the specification made in Clause 4.1.3 of Project Administration Handbook for Civil Engineering Works.	The “threshold” value has been revised to 50,000m ³ in Section 7.4.9. Please refer to the revised EA under Appendix B .
1.30	Section 7.4.13: As the reference documents on the handling of Asbestos were quoted, please review whether asbestos wastes will be generated and the associated mitigation measures to be implemented.	Irrelevant references “Code of Practices and Guidelines for Asbestos Control and Handling” and “ProPECC PN2/25 Handling of Asbestos Containing Materials in Building” have been removed to avoid confusion. Please refer to the revised EA under Appendix B .
1.31	Table 7.1: <ul style="list-style-type: none"> - Please provide the calculation of 53,000m³, especially the depth and area of the basement to be excavated. - Please provide the calculation of non-inert C&D materials of 1,000m³ during the excavation of basement. - The disposal method to non-inert C&D materials is unlikely justified. Please review. - Regarding the figure 20,977 tonnes quoted in footnote (b), 	Table 7.1 has been updated accordingly: <ul style="list-style-type: none"> - According to the latest information provided by the project team’s architect, the estimated quantity of inert C&D waste has been updated, and the area, depth and volume are provided in Appendix 7. - Quantity of non-inert C&D material has been estimated as 5% of GFA (i.e. 39,400*0.05). - The disposal method for non-inert C&D materials has been revised

	Departmental Comments	Responses to Comments
	please provide the conversion factor.	<p>as "To be reused, recycled or disposed of at landfill as the last resort".</p> <ul style="list-style-type: none"> - The original footnote (b) has been removed to avoid confusion and the note quoted in disposal method has been updated. <p>Please refer to the revised EA under Appendix B.</p>
1.32	Section 7.5.3: Please review if the transportation of construction waste would be monitored by means of dump trucks equipped with real-time tracking and monitoring devices.	Section 7.5.3 has been supplemented accordingly. Please refer to the revised EA under Appendix B .
	<u>Sewerage Impact Assessment Report</u>	
1.33	<p>Sections 4.8, 4.11, 6.3, Figure KT3/SIA/003 and Annex B: Annex B indicates that some downstream sewers will exceed capacity under the conditions of the proposed and planned developments. In the SIA reports submitted in 2021 and 2022, the consultant proposed upgrading several sewer sections due to overcapacity. However, in this submission, the proposed upgrades are indicated to be carried out by others. Please liaise with relevant project teams to confirm the responsibility for the proposed upgrading works and provide the relevant records confirming agreements with other parties. If no such agreement exists, please review and carry out the upgrading works for the following sewer sections as outlined under this project: FWD1035281, FWD1035284 to FWD1035286, FWD1022574, FWD1022578 to FWD1022585, and FWD1022588. The proposal is based on the following considerations:</p> <ul style="list-style-type: none"> (i) the intake year for the proposed projects is later than the other interfacing projects; (ii) the earlier projects either: <ul style="list-style-type: none"> - did not cause overcapacity upon their completion, and no mitigation measures were proposed for the affected pipe sections; or - did not cause overcapacity to such an extent as shown in the latest proposal, resulting in smaller pipe sizes being 	<p>Based on the intake year of the planned developments and the Proposed Development, the hydraulic calculation in Annex B of the revised SIA under Attachment C has been revised.</p> <p>According to Annex B, it is found that sewers FWD1035283, FWD1035285, FWD1035287 to FWD1035294, FWD1022565 and FWD1022570 to FWD1022588 are over capacity before the intake of the Proposed Development and should be upgraded by other project proponents. After the intake of the Proposed Development, sewers FWD1035257, FWD1035260, FWD1035261, FWD1035281 to FWD1035282, FWD1035284, FWD1035286 and FWD1022566 are over capacity and sewer upgrading works to be implemented by the Applicant are proposed.</p> <p>In view of the uncertainty of the intake year of different planned developments, it is suggested that the hydraulic calculation be reviewed at a later stage in order to have a more precise assessment. The Applicant has no objection for the Town Planning Board to impose an approval condition for submission of revised SIA in this regard if required.</p>

	Departmental Comments	Responses to Comments												
	(iii) proposed previously. the proposed development site contributes a relatively substantial flow to the area.													
1.34	Table 4.1: As mentioned in Section 4.5, the application site is proposed to connect to existing sewer at manhole FMH1030367. Please clarify the correct connection manhole for Catchment No. 3 (i.e. the proposed development) should be FMH1030366 or FMH1030367.	Please be advised that the Application Site is proposed to connect to the existing sewer at manhole FMH1030367.												
1.35	<p>Table 4.1:</p> <ul style="list-style-type: none"> Please note that the connection manhole of the Catchment No. F is 800m³/day to FMH1030382 and 1366.4m³/day to FMH1030386. Please update Table 4.1, relevant figures pages, Annex B4, Annex B5 and Annex E accordingly. Please update the ADWF of Catchment 6 and Annex D by adding the ADWF of Golf Villa at 33 Kam Chui Road. Please update the ADWF of Catchment 7 and Annex D by assuming the 94 buildings with 3 storeys. As a conservative approach, please also include the following flow in the hydraulic calculation. Please update Table 4.1, Figures, Annex B4, Annex B5 and Annex E accordingly. <table border="1"> <thead> <tr> <th>Development</th><th>ADWF (m3/d)</th><th>Swimming pool backwash (l/s)</th></tr> </thead> <tbody> <tr> <td>A/NE-KTS/525</td><td>45.8</td><td>-</td></tr> <tr> <td>A/NE-KTS/538</td><td>4.5</td><td>-</td></tr> <tr> <td>A/NE-KTS/541</td><td>2.1</td><td>-</td></tr> </tbody> </table>	Development	ADWF (m3/d)	Swimming pool backwash (l/s)	A/NE-KTS/525	45.8	-	A/NE-KTS/538	4.5	-	A/NE-KTS/541	2.1	-	Noted. Relevant tables, figures and annexes have been revised accordingly. Please refer to the revised SIA under Attachment C .
Development	ADWF (m3/d)	Swimming pool backwash (l/s)												
A/NE-KTS/525	45.8	-												
A/NE-KTS/538	4.5	-												
A/NE-KTS/541	2.1	-												
1.36	<p>Table 4.1, Annex B and Annex E:</p> <ul style="list-style-type: none"> The SPS capacity calculation in Annex E indicates that the Tsung Pak Long Sewerage Pumping Station is over capacity. Please note that the estimated flow for the relevant developments has been updated according to the latest information available. The estimate is subject to further adjustments based on specific designs of individual 	Noted. Table 4.1, Annex B and Annex E have been revised accordingly. Please refer to the revised SIA under Attachment C .												

	Departmental Comments	Responses to Comments
	<p>developments. According to the latest information, please find below estimated swimming pool backwash for proposed and existing development and update the hydraulic calculations accordingly:</p> <ul style="list-style-type: none"> ■ Catchment No. A: 5.8L/s ■ Catchment No. B: 14.4L/s ■ Catchment No. C: 0.125L/s ■ Catchment No. E: 3.5L/s <p>- Please review mitigation measures in view of the above updates in peak flow estimates. For example, please liaise with DSD on the detailed discharge arrangement of the backwash sewage from swimming pool to ensure the discharge operation will not be taken at peak period.</p>	Noted.
1.37	Figure KTS/SIA/003: Please indicate the size of proposed sewer to FMH103037 in Figure KTS/SIA/003.	Noted, Figure KTS/SIA/003 has been revised. Please refer to the revised SIA under Attachment C .
1.38	<p>Annex B:</p> <ul style="list-style-type: none"> - The content of Page 2 and Page 3 of Annex B appear to be identical. Please verify and correct accordingly. - Please update all calculations in Annex B according to the above comments. - Please include the hydraulic calculation for the new sewers connecting the proposed development to FMH1030367. 	Noted, Annex B has been revised accordingly. Please refer to the revised SIA under Attachment C .
1.39	<p>Annex D:</p> <ul style="list-style-type: none"> - Please update the calculation according to the above comments. - For the Yin Kong Public Toilet flow in Catchment 7, please add a peak flow of 26.8L/s at FMH1021550. Please also revise Annex B accordingly. 	Noted, Annex B and Annex D have been revised accordingly. Please refer to the revised SIA under Attachment C .

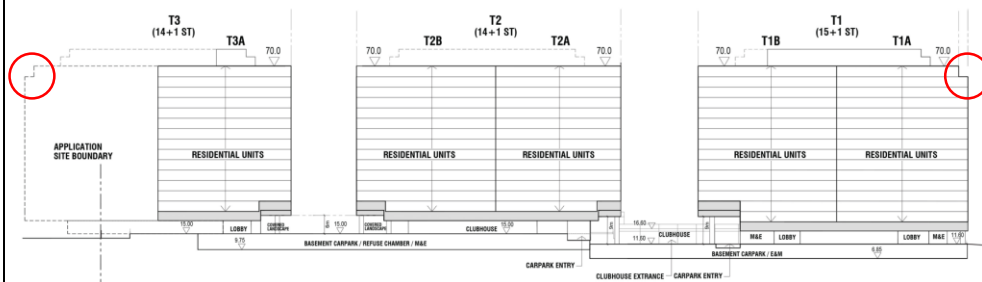
	Departmental Comments	Responses to Comments
2.	Comments from Water Supplies Department	
	<u>Water Supply Impact Assessment</u>	
2.1	Table 3.1: Please show the calculation of the additional freshwater required for the irrigation system.	Noted. The freshwater demand for the irrigation system is assumed to be 0.007m ³ /day per planter area. It has been supplemented in the replacement pages of Water Supply Impact Assessment (WSIA) under Appendix D .
2.2	Para. 3.3: Please provide further hydraulic calculation to prove that the anticipated increase in water demand will not impose adverse impact to the existing water supply network under the proposed connection scheme, including the water mains upstream the DN200FWM along Hang Tau Road. As an alternative, the applicant may also consider laying a DN200 water main from the proposed lead-in position of the development to the DN200 tee-off from the existing DN600 fresh water mains at the junction between Kam Hang Road and Hang Tau Road.	Noted. The proposed lead-in fresh water main will be teed off from the existing DN600 fresh water mains. Hydraulic calculation has been included in Annex D of the revised WSIA under Appendix D .
2.3	Para. 4.3: The term “internal water supply system” as used in the report appears to refer to the internal plumbing system or inside services system of the development. If affirmative, please use the standard terms “internal plumbing system” or “inside services system” for clarity and precision.	Noted. “Inside services system” has been used to replace “internal water supply system”. Please refer to the replacement pages of WSIA under Appendix D .
3.	Comments from Drainage Services Department	
	<u>Drainage Impact Assessment</u>	
3.1	<p>Drawing KT3/DIA/003 and DIA/004:</p> <ul style="list-style-type: none"> - The 1050UC downstream of the proposed diversion pipe is not found. Please advise whether the 1050UC is an existing or proposed UC? - The propose pipe alignments introduce two 90 degree bends within a short distance as compared to the existing pipe 	<ul style="list-style-type: none"> - Please be advised that the 1050UC diversion pipe is a proposed underground drainage pipe that is used to divert the flow from upstream. - The proposed pipe alignment has been revised so that the angles are gentler which will benefit the hydraulic performance of the


	Departmental Comments	Responses to Comments
	alignments. Please advise if additional head loss due to the bends would cause any negative impacts to the hydraulic performance of the proposed pipe.	concerned segment. Please refer to the replacement pages of Drainage Impact Assessment (DIA) under Appendix E .
3.2	Section 4.4 and Table 4.1: Please elaborate on how the numbers were obtained. These numbers were not found in Appendix B.	Please be clarified that the peak runoff rates are obtained from the Appendix B of the DIA. Please also note that Appendix B has also been updated in response to the latest departmental comments. Please refer to the replacement pages of DIA under Appendix E .
3.3	Appendix B: It is unclear which sub-catchment(s) was taken into account in the hydraulic calculation in appendix B. Please clearly indicate the discharge point and its contributing sub-catchment(s) in the layout plan.	Please be advised that Appendix B has been updated in which the catchment therein is now only contributed by the Proposed Development. Please refer to the replacement pages of DIA under Appendix E .
3.4	Section 5.2: "Refer to Section 4.7 above..." Section 4.7 not found.	Noted. Section 5.2 has been revised accordingly. Please refer to the replacement pages of DIA under Appendix E .
3.5	<p>Appendix C:</p> <ul style="list-style-type: none"> - Please advise the reference (e.g. as-built drawings, survey) for the cross section of the River Beas. Dimension (height, width) should be clearly indicated in the cross section. - Please elaborate on how the hydraulic gradient (S) was obtained. - The channel capacity is smaller than the peak runoff rate. Please clarify. 	<ul style="list-style-type: none"> - Please be advised that the cross section of the River Beas is based on an as-built drawing where the bottom width of the River Beas is 16m and the height of the embankment is 1.8m. - The hydraulic gradient is also based on the as-built drawing which is 0.2% (0.002). - The peak runoff rate and the channel capacity is revised. Please refer to the replacement pages of DIA under Appendix E.
3.6	<p>Appendix D:</p> <ul style="list-style-type: none"> - Please clearly whether the "catchment area" refer to C1 in the layout plan. - Please advise what does the magenta area represent? 	<ul style="list-style-type: none"> - Please be advised that "C1" refers to the catchment area (Proposed Development). - The magenta area is the planned road widening works by the Applicant. For clarity, legends have been added to Appendix D of the revised DIA under Appendix E.

	Departmental Comments	Responses to Comments
	<ul style="list-style-type: none"> The application site, which was partially discharging to Sheung Yue River by overland flow, is now proposed to discharging to the existing stream I via the 900mm dia. pipe. Please advise if the existing stream can cater the additional flow from the site. 	<ul style="list-style-type: none"> Please refer to the sensitivity checking of the River Beas in Appendix C of the revised DIA under Appendix E.
	<u>Sewerage Impact Assessment</u>	
3.7	The following comments are for the consultants' reference and consideration. They are subject to the views and agreement of EPD as they are the planning authority of sewerage infrastructure. The SIA Report has to meet the full satisfaction of EPD.	Noted.
3.8	Para. 4.1 & Para. 4.9: The peak flow (instead of ADWF) from the proposed development should be used for comparison to the design capacity of the Shek Wu Hui STW. In addition, please check with our ST1 Division to verify the availability of spare capacities of Shek Wu Hui STW & Tsung Pak Long SPS to cater for the unplanned and sporadic development.	Noted. Peak flow has been incorporated in Table 4.1 in the revised SIA under Appendix C . In view of the uncertainty of the intake year of different planned developments, it is advised that the capacity checking of the TPLSPS should be reviewed at later stage in order to have more precise assessment. The Applicant has no objection for the Town Planning Board to impose an approval condition for submission of revised SIA in this regard if required.
3.9	Table 4.1: The peak flows from the existing / planned developments should be included in the Table for completeness.	Noted, Table 4.1 is revised. Please refer to the revised SIA under Appendix C .
3.10	Figure KT3/SIA/002 to 010: The details of the existing / proposed sewerage systems (such as the invert & cover levels, the manhole ID, etc) should be incorporated in the figures for ease of reference.	Noted. The figures have been revised. Please refer to the revised SIA under Appendix C .
3.11	Figure KT3/SIA/002: I understand that some proposed sewer will be upgraded by other parties. Please liaise with relevant parties and ensure that the proposed upgrading works are completed by the time of population intake of the proposed development.	Some sewers will be over capacity before the population intake of the Proposed Development. Hence, these segments of sewers are to be upgraded by other project proponents.

	Departmental Comments	Responses to Comments
3.12	Annex B: According to Table 5 in Sewerage Manual (Part 1), the values of roughness (ks) for slimed sewers are correlated with the velocities of the respective sewers. Please justify the use of 1.5mm for all sewers.	Based on the manhole survey report in Annex F (see revised SIA under Appendix C), the sewers are made of vitrified clayware. Based on the Table 5 in Sewerage Manual (Part 1), the roughness for slimed clayware sewer with a normal condition is 1.5 mm.
4.	Comments from Agriculture, Fisheries and Conservation Department	
	<u>Planning Statement</u>	
4.1	S.2.2.6: <ul style="list-style-type: none"> - Please delete "abandoned" before "meander" in the first line. - Please revise "Mitigation woodland" as "Mitigation Planting" in the second sentence. - Please revise "(AFCD) planted trees" as "(AFCD) maintains trees". - Please delete "with the aim ... preserving the ecological systems". - Please revise "mitigation woodland" as "mitigation planting" in the last sentence. 	The Planning Statement has been revised accordingly. Please refer to Appendix A .
4.2	<u>S.8.4</u> : Please note that AFCD would only take up the vegetation maintenance but not the land management of the compensatory planting area. As such, please revise as "The compensatory planting area would be provided by the Applicant to the satisfaction of AFCD for future handover to AFCD for their vegetation management and maintenance."	The Planning Statement has been revised accordingly. Please refer to Appendix A .
5.	Comments from Lands Department	
5.1	The subject site comprises 17 private lots (or parts thereof) in D.D. 92 and adjoining Government land. Land Supply Section of the Lands Department ("LandsD") is handling a proposed land exchange application (new lot to be known as Lot No. 2644 in D.D. 92) to implement the subject proposed residential development under the	Noted.

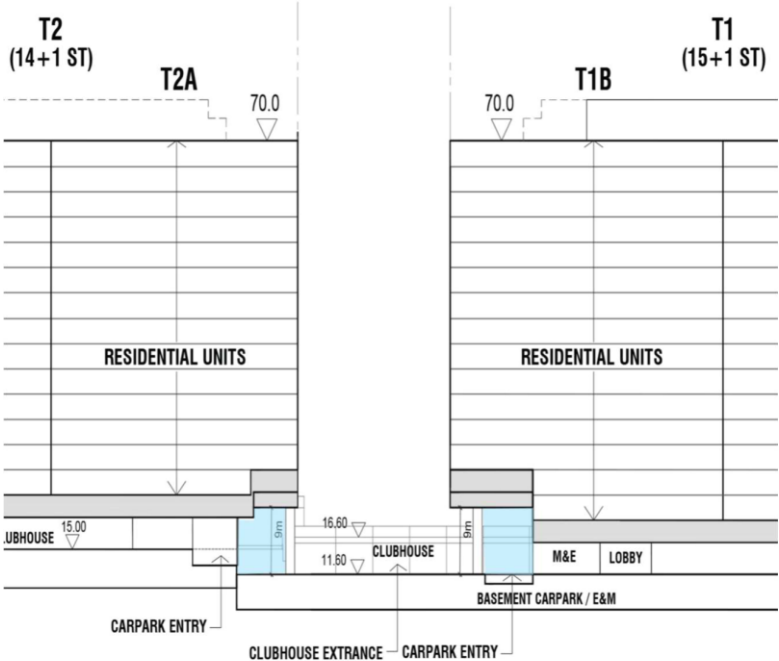
	Departmental Comments	Responses to Comments
	parallel processing arrangement. However, there is no guarantee that the said application, including the granting of any Government land, will be approved. Such application will be dealt with by LandsD acting in the capacity of the landlord at LandsD's discretion; and if it is approved, will be subject to such terms and conditions including among others, the payment of premium and administrative fee as may be imposed by LandsD.	
5.2	As pointed out in paragraph 2.2.1 of the Planning Statement, a minor portion of the Government land near the southeastern boundary is occupied by temporary structures which is surveyed squatter structures. Granting of the relevant Government land under the proposed land exchange application (if so approved), would be subject to the appropriate clearance procedures.	Noted.
5.3	In respect of the second bullet point under paragraph 8.6 of the Planning Statement, the updated Proposal of Compensatory Planting Areas submitted by the applicant to AFCD in May 2024 was in response to the comments from AFCD via LandsD in processing the land exchange application for the subject proposed residential development, instead of the "previously approved house development".	Please note that the proposal submitted by the Applicant to AFCD in May 2024 was for the approved scheme under Application No. Y/NE-KTS/15 approved in 2022. Paragraph 8.6 of the Planning Statement has been revised accordingly, please refer to Appendix A .
6.	Comments from Fanling, Sheung Shui & Yuen Long East District Planning Office, Planning Department	
6.1	According to the applicant's submission, it seems that the proposed 2m-wide footpath along the eastern boundary is partly within the application site and partly falls outside the site boundary. Please clarify and provide a plan to clearly indicate the extent of the proposed 2m-wide footpath.	<p>Please refer to Figure A enclosed under Appendix F for the extent of the widening works.</p> <p>Hang Tau Road and its footpath is currently partly substandard. Part of its portion abutting the Application Site is less than 7.3m wide and 2m wide respectively.</p> <p>To provide standard 7.3m width for Hang Tau Road, a new kerb line is proposed by the Applicant. Part of the existing footpath and some area</p>

	Departmental Comments	Responses to Comments
		<p>within the Application Site will become the widened portion of Hang Tau Road. In the middle of the Application Site, the Proposed Development will setback further to provide a GMB layby as planning gain.</p> <p>Regarding the provision of 2m-wide footpath, for the portions with no changes to kerb line proposed, the area abutting the existing footpath will be setback for footpath widening. For the portion with modifications to kerb line proposed, upon proposed widening of Hang Tau Road, further setback within Application Site boundary will be provided to achieve a continuous 2m wide footpath. The portion of footpath adjacent to the GMB layby will be wider to accommodate passenger queue. Pedestrian crossing facilities will be provided upon widening of Hang Tau Road and its footpath as planning gain.</p>
6.2	Please advise whether the applicant will take up the provision and future maintenance / management of the proposed 2m-wide footpath.	After completion of design and implementation of the proposed 2m-wide footpath up to Government standard by the Applicant, it will be handed over to the Government for future maintenance and management.
6.3	It is noted from Figure 3.7 (photomontage) that setback at the north and south ends of the highest floors of T1 and T3 were proposed to achieve some variation in building height. Please provide indicative floor plans for typical floors and the highest floor, as well as section plan to illustrate the above.	<p>Please refer to Figure 3.5 of the Planning Statement for the Indicative Section Plan. It has reflected the variation in building height in the topmost floors of T1 and T3 (one storey high). See red circles below for easy reference please.</p>  <p>The same is reflected in the Indicative Master Layout Plan (MLP) in Figure 3.2 of the Planning Statement. The areas hatched red below in the extracts from the MLP reflect that the topmost floors of T1 and T3 have a smaller</p>


	Departmental Comments	Responses to Comments
		<p>floor plate than the levels below.</p>  <p>Typical floor plans are provided in Figures 5 and 6 of the Environmental Assessment under Appendix B for your information.</p>
6.4	Please advise on the future management and maintenance of the pedestrian footpath along Hang Tau Road upon widening completed, as the area proposed for footpath widening is located within the application site.	After completion of design and implementation of the proposed 2m-wide footpath up to Government standard by the Applicant, it will be handed over to the Government for future maintenance and management.
6.5	Figure 3.5 (Indicative Section Plan): Please advise if the voids located at G/F of T3A and T2B are permeable from east to west of the application site. (i.e. Area shown in yellow in the extract plan below).	The voids are permeable from northwest to southeast of the Application Site. To further enhance the permeability, these voids are strategically positioned to be adjacent to the proposed building gaps as indicated in Figure 3.4 of the Planning Statement, which is extracted below for easy reference. The location of voids are also circled in the extract plan below.

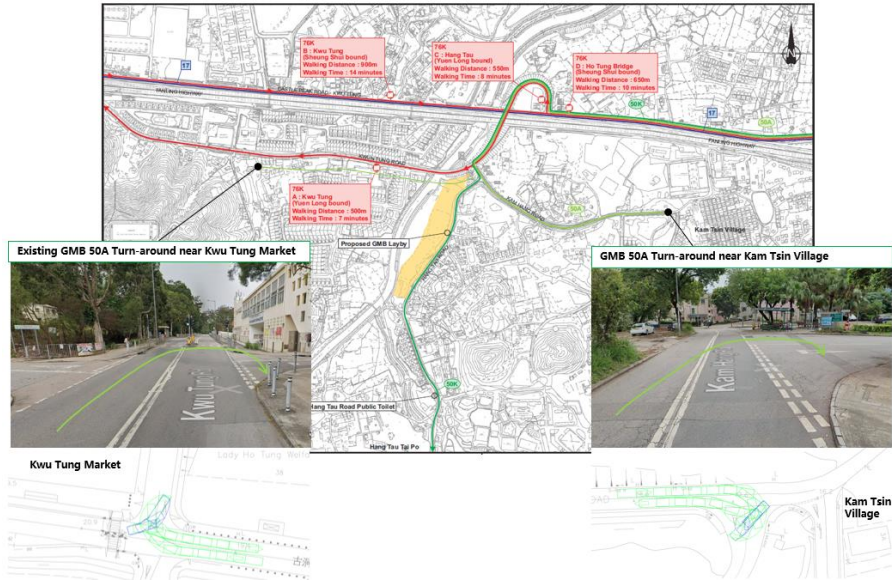
Section 16 Planning Application for Proposed Residential Development with Minor Relaxation of Plot Ratio Restriction at Lots 1027, 1029, 1030, 1034A, 1034B, 1039 (Part), 1040, 1042 RP, 1043 RP, 1044 RP (Part), 1045, 1047, 2233 (Part), 2251 S.A RP, 2256 RP, 2315 (Part) and 2316 RP (Part) in D.D. 92 and Adjoining Government Land (New Lot to be known as Lot 2644 in D.D. 92), Kwu Tung South, Sheung Shui, the New Territories (Application No. A/NE-KTS/565)



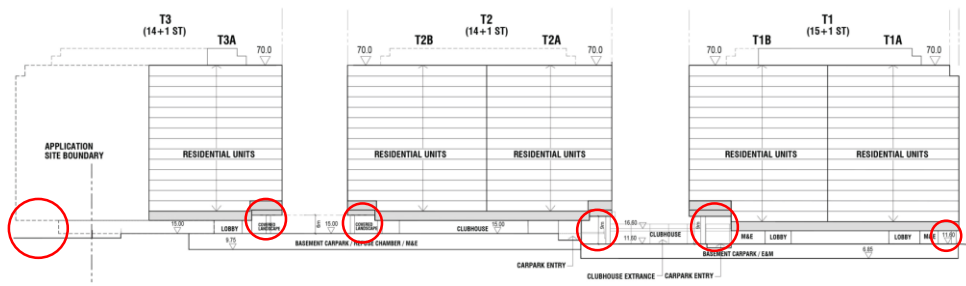
	Departmental Comments	Responses to Comments
6.6	<p>Figures 3.4 and 3.5 (Indicative MLP and Section Plan): Please advise if the voids located at G/F of T2A and T1B are permeable from east to west of the Application Site. (i.e. Area shown in blue in the extract plan below) :</p> 	<p>The voids are permeable from northwest to southeast of the Application Site. They generally align with the building gaps indicated in Figure 3.4 of the Planning Statement, which is extracted in response 6.5 above for easy reference.</p>
6.7	<p>Please clarify and indicate from relevant plans the extent of the road improvement works to be carried out by the applicant. It is noted from Figure 3.13 that the footpath on both sides of Hang Tau Road is included in the proposed footpath widening scheme, hence please make sure the portion related to the applicant's road widening proposal are reflected clearly on Figure 3.13. If Hang Tau Road 7.3m widening works is not provided by the applicant or if the footpath opposite to the site is not covered by the said proposed road-</p>	<p>Please refer to Figure A attached under Appendix F for the extent of the road improvement works. Figure 3.13 of the Planning Statement (see Appendix A) has been revised to accurately reflect its extent.</p> <p>Regarding the opposite side of Hang Tau Road footpath, portion of it will be modified by the Applicant of Application No. Y/NE-KTS/17. Under No. Y/NE-KTS/17, the junction of Kam Hang Road and Hang Tau Road will be improved with provision of 2m footpath near the junction.</p>

	Departmental Comments	Responses to Comments
	widening, it should not be considered as a “design merit” or a “plan gain”.	<p>Also, there are existing settlements along the eastern side of Hang Tau Road footpath, such as Casas Domingo, involving 3rd party lots. Widening of footpath along that side by the Applicant is therefore infeasible.</p> <p>To provide planning gains, the Applicant has proposed provision of GMB layby and pedestrian crossing facilities. These planning gains were accepted under the previous rezoning Application No. Y/NE-KTS/15 and are maintained in the current planning application.</p>
6.8	Referring to the comments from the Transport Department (TD) regarding turning space for GMB. As the application site of the current application and the site of s.12A planning application (No. Y/NE-KTS/13) are under different ownership and there is no definite development programme for the proposed development under application No. Y/NE-KTS/13, please clarify if it is technically feasible and appropriate to use a mini-roundabout proposed by another developer under Y/NE-KTS/13 to serve the proposed new GMB route (which will operate between the application site and Sheung Shui Station to serve the proposed development at the application site with population intake of about 2,900).	<p>It is understood that the design of the turnaround facility proposed under Application No. Y/NE-KTS/13 is currently under discussion between TD and the applicant of that application. Whether it is an external mini-roundabout or any other form of turnaround facilities, it is understood that a turnaround to facilitate the routing of GMB will be available upon the completion of that development.</p> <p>In case that <u>this permanent GMB turnaround by others</u> is not completed on time for the intake of the subject Application Site, the GMB can still turn around near the south of Hang Tau Road Public Toilet with swept path analysis in Annex E of the traffic impact assessment (TIA) (Appendix H) as an alternative arrangement based on existing road layout, subject to the GMB trial run on-site.</p>

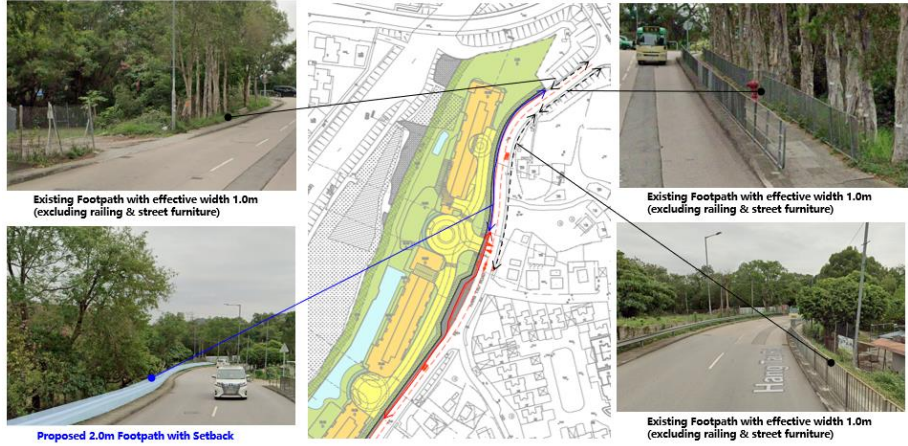
	Departmental Comments	Responses to Comments
		<ul style="list-style-type: none"> 8m GMB U-turn near Hang Tau Road Public Toilet (Temporary Arrangement)  <p>This temporary turn-around arrangement is comparable to the current operation of GMB 50A near Kam Tsin Village and Kwu Tung Market with a similar service level of 10-15 minutes during peak hours, as shown in the following swept path analysis in Annex E of the TIA:</p>

	Departmental Comments	Responses to Comments
		<p>• Existing Turn-around Arrangement for GMB 50A</p>  <p>The map shows the proposed GMB 50A route (green line) and existing turn-around points. Key locations include Kwu Tung Market, Kam Tsin Village, and the proposed GMB 50A route. The map also shows the existing footpaths along Hang Tau Road and the junction of Kam Hang Road. The photos show the existing footpaths and the junction of Kam Hang Road.</p>
6.9	In view of TD's concern on pedestrian connectivity and safety, please consider if the proposed footpath widening could be extended to the junction of Kam Hang Road.	As updated in Para 3.5.6 and shown in Drawing 3.4 in the TIA under Appendix H , the existing footpaths along Hang Tau Road already have an effective width of 1.0m (excluding railing and street furniture such as fire hydrant as shown in photo), which can be operated within LOS A (16 peds/m/min) with anticipated population intake of the proposed development and passage of wheelchair.

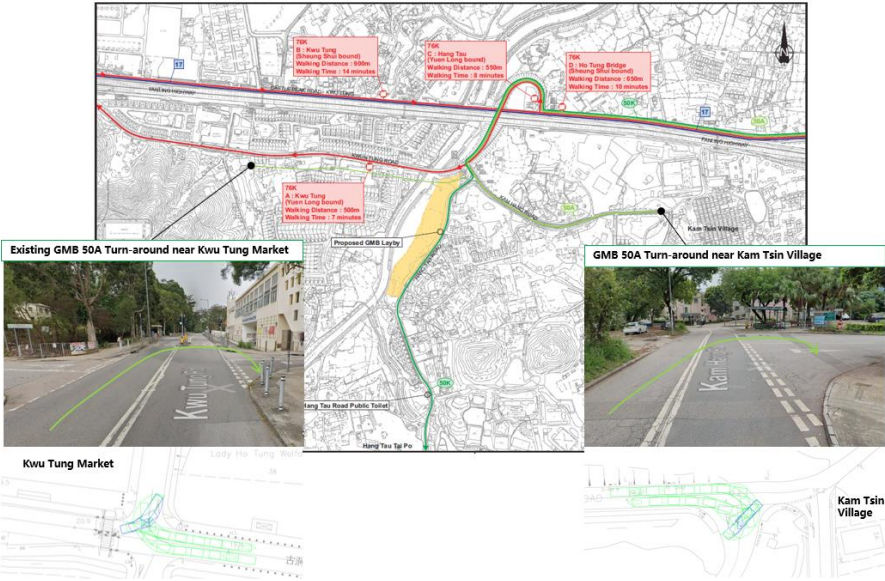
	Departmental Comments	Responses to Comments
6.10	Figures 3.4 and 3.5: Please clarify if the residents' clubhouse located between T1 and T2 are standalone block that is not connected to T1 and T2.	The said residents' clubhouse is not a standalone block, it is connected to T1.
6.11	Please advise the building height of the (1) clubhouse between T1 and T2; and (2) height of the cover for covered walkways connecting T1 and T2, and T2 and T3.	The building height of the clubhouse between T1 and T2 is 5m. The top level of covered walkway will be 4.5m AFFL (i.e. Above Finished Floor Level).
6.12	Please advise the location of the fencing for the proposed development and whether the residents will be allowed to enter the compensatory tree planting areas adjoining River Beas from the development.	The fencing for the proposed development will largely follow the Application Site boundary in general (excluding the setback area along Hang Tau Road, which will be for footpath widening). The compensatory planting areas are proposed to be surrendered to Lands Department and are not part of the Proposed Development. As the compensatory planting areas are located outside Application Site, residents will not be allowed to enter the compensatory planting areas.
6.13	Please advise if walking trails accessible by residents are provided at the area for buffer tree planting located to the west of the application site.	Please note that only maintenance path will be provided in the tree buffer zone.

	Departmental Comments	Responses to Comments
6.14	Please provide responses to the public comments received, especially objecting views from the Village Representative (Sequence No. 20), Mary (Sequence No. 32 in particular the accusation on 'lack of community/public benefit' and how the proposed plantation would contribute to a healthy ecosystem), as well as the concern from HK and China Gas Co. (Sequence No. 31).	Please refer to separate Responses-to-Comments table enclosed under Appendix G .
6.15	According to the submitted Air Ventilation Assessment (Appendix D), it is stated that six "empty bays" are proposed on the ground floor (paragraph 1.6.4 and Figure 3b refer). Please clarify if these six "empty bays" are 'voids' permeable from east to west. Please also indicate these six "empty bays" on Section Plan (Figure 3.5 of the Planning Statement), where appropriate.	<p>These six "empty bays" refers to "voids" permeable from northwest to southeast. These voids have been indicated in the Indicative Section Plan (Figure 3.5 of the Planning Statement). They are circled in red below for easy reference.</p> 
7.	Comments from Transport Department	
	<u>Comments from Traffic Engineering NT Division</u>	
7.1	R-t-C Item 4.1 & Para. 3.5.1: Our previous comment regarding the extent of the proposed widening of existing Hang Tau Road into 7.3m carriageway has not been fully addressed in the R-t-C. Please provide a layout plan about the extent of the Hang Tau Road widening works and provide a cross section of the carriageway indicating the lane width and marginal strip. Please also advise the road drain and public lighting provision of the proposed road.	<p>With reference to the approved S12A Planning Application (No. Y/NE-KTS/15), the proposed extent of road improvement works will be covered by the "Setback Area" along Hang Tau Road abutting the Application Site.</p> <p>As shown by the relevant plan and cross sections in Drawings 3.2 and 3.3 of the revised TIA enclosed under Appendix H, the proposed setback areas are indicated for the road improvement works along Hang Tau Road, which includes:</p> <ul style="list-style-type: none"> • 7.3m carriageway • 2.0m footpath abutting site boundary only

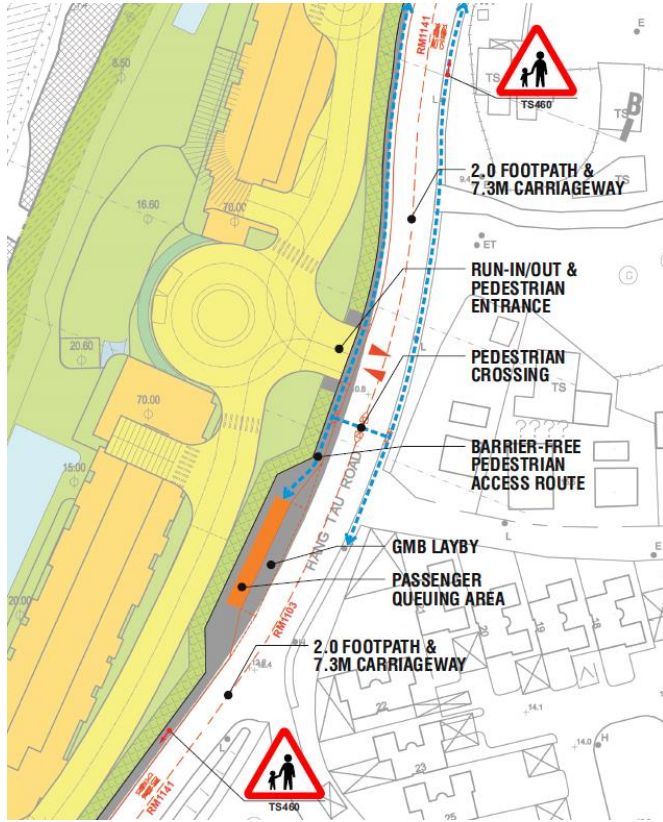
	Departmental Comments	Responses to Comments
		<div data-bbox="1205 225 1989 292"><ul style="list-style-type: none">• A GMB layby with queuing area on Hang Tau Road• A cautionary pedestrian crossing across Hang Tau Road</div> <div data-bbox="1160 328 2130 427"><p>The setback area, which includes the public footpath and GMB layby outside the development, will be handed over for management and maintenance by the Government at their own costs.</p></div> <div data-bbox="1160 459 1995 1066"></div> <div data-bbox="1160 1102 2130 1273"><p>As updated in Para. 3.5.6 and shown in Drawing 3.4 in the TIA, the existing footpaths along Hang Tau Road have an effective width of 1.0m (excluding railing and street furniture such as fire hydrant as shown in photo), which can be operated within LOS A (16 peds/m/min) with anticipated population intake of the proposed development and passage of wheelchair.</p></div>

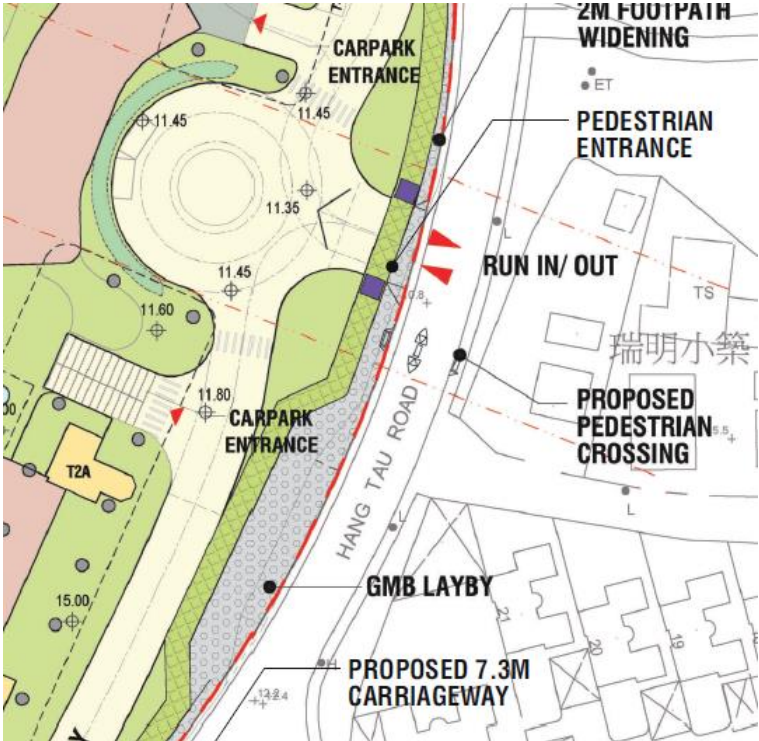
	Departmental Comments	Responses to Comments
		 <p>Details of road drain and public lighting design will be submitted with the General Building Plans following the approval of S16 planning application.</p>
7.2	<p>R-t-C Item 4.3 & Para. 3.5.1: We have provided comments on S12A Planning Application (No. Y/NE-KTS/15) concerning the proposed mini-roundabout. Considering it is not a cul-de-sac but with multi-directional traffic movements and pedestrian movement across the run-in of the development, as well as the turning constraint of long vehicles, please study if the mini-roundabout can be converted into a priority T-junction.</p>	<p>Please be clarified that the concerned mini-roundabout was proposed under a separate approved S12A Planning Application (No. Y/NE-KTS/13) further south of Hang Tau Road, which was intended to facilitate the turnaround of GMB along Hang Tau Road.</p> <p>As updated in Para. 4.2.4 – 4.2.5 in the TIA enclosed under Appendix H, it is understood that the design of the turnaround facility is currently under discussion between TD and the applicant of the other application. Whether it is an external mini-roundabout or any other form of turnaround facilities, it is understood that a turnaround to facilitate the routing of GMB will be available upon the completion of the other development.</p> <p>In case that <u>this permanent GMB turnaround by others</u> is not completed on time for the intake of the subject Application Site, the GMB can still turn around near the south of Hang Tau Road Public Toilet with swept path analysis in Annex E of the TIA as an alternative arrangement based on existing road layout, subject to the GMB trial run on-site.</p>

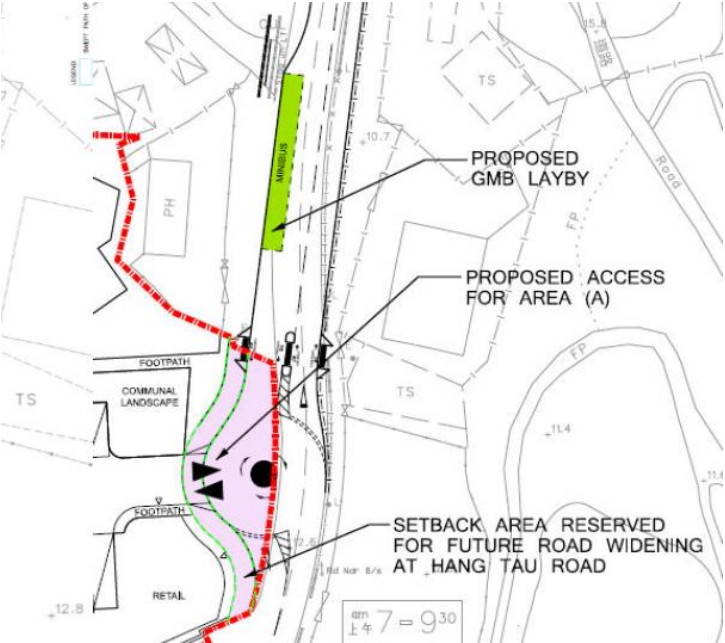

Departmental Comments	Responses to Comments
	<p data-bbox="1184 225 1841 245"> <ul style="list-style-type: none"> 8m GMB U-turn near Hang Tau Road Public Toilet (Temporary Arrangement) </p> <div data-bbox="1153 258 2063 785"> </div> <p data-bbox="1153 818 2114 952"> This temporary turn-around arrangement is comparable to the current operation of GMB 50A near Kam Tsin Village and Kwu Tung Market with a similar service level of 10-15 minutes during peak hours, as shown in the following swept path analysis in Annex E of the TIA: </p>

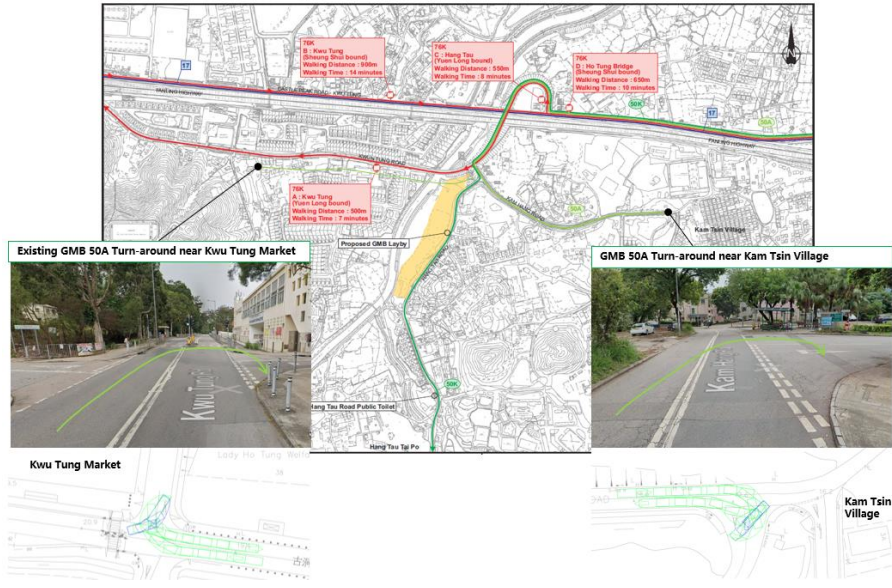
	Departmental Comments	Responses to Comments
		<p>• Existing Turn-around Arrangement for GMB 50A</p>  <p>The map shows the proposed GMB 50A route (green line) and existing turn-around points (red dots) near Kwu Tung Market and Kam Tsin Village. Below the map are two photographs: 'Existing GMB 50A Turn-around near Kwu Tung Market' and 'GMB 50A Turn-around near Kam Tsin Village', both showing the road layout and the turn-around area.</p>
7.3	<p>For the junction assessment in Annex B,</p> <ul style="list-style-type: none"> - Please clarify the lane width W c-b and visibility Vr-c-b adopted for "J1 with improvement" and lane width W b-a and W b-c adopted for "J2 with improvement". - DFCb-c (0) and simultaneous queuing at minor road for "J2 with improvement" shall be included into the calculation. Please clarify. 	<p>The input parameters of junction assessment have been reviewed in Annex B of the TIA under Appendix H.</p> <p>The results of junction performance have also been updated in Tables 2.2 and 5.2 of the TIA respectively. This does not constitute any change in the study findings and conclusions.</p>
7.4	<p>Please supplement the swept path analysis along Hang Tau Road, Kam Hang Road and Kwu Tung Road from the proposed development.</p>	<p>The swept path analysis along Hang Tau Road, Kam Hang Road and Kwu Tung Road have been supplemented in Annex E of the TIA under Appendix H.</p>

	Departmental Comments	Responses to Comments
	<u>Comments from Transport Operations (NT) Division</u>	
7.5	Para. 2.3.4: As stated in our previous comment, the bus stops named as B & D by the applicant with walking distance of 800m and 650m are considered as outside the service catchment of the proposed private residential development. Although the applicant stated in their response to comment that para. 2.3.4 are updated, the above contents have not been revised. Please revise the para 2.3.4 of the TIA as advised previously.	As stipulated in the footnote (1) under Table 2.4 of the TIA under Appendix H , the bus stop locations (B) and (D) <u>may be outside the typical service catchment</u> . Para. 2.3.4 of the TIA has been updated to include the above.
7.6	Para. 2.3.6: The peak hour headway and average occupancy in AM peak and PM peak for GMB 50K (Hang Tau bound) and GMB 50A (Kwu Tung South bound) are not found in table 2.5. As stated in our previous comment, the applicant is requested to provide the nearest bus stop, peak hour headway and average occupancy during peak hours for the opposite bound service as well (i.e. Hang Tau bound and Kwu Tung South bound). To provide a whole picture on the existing utilization rate of the existing public transport services, please provide these information.	The “peak hour headway in AM/PM peak hours” and the “average occupancy” for both outbound and inbound directions have been supplemented in Table 2.5 of the TIA under Appendix H .
7.7	Para. 2.3.7: We do not agree that the service of PLB (red minibuses) along Castle Peak Road is “ <i>highly unreliable</i> ” in terms of fare and frequency. Instead of “ <i>highly unreliable</i> ”, public light buses operate flexibly subject to the actual passenger demand. Please suitably revise the wordings of this paragraph.	Para. 2.3.7 in the TIA under Appendix H has been updated as follows: “... the service level of PLB (red mini-bus) along Castle Peak Road is <u>flexible in terms of fare and frequency, subject to the actual passenger demand</u> .”
7.8	Para. 3.5.2: For drawing 3.2, the provision of new crossing in between the developer's proposed GMB layby and vehicular run-in out of the proposed private residential development seems would not be capable to comply with TPDM requirements in terms of clearance width in between them. It seems that clearance distance is not sufficient in between these 3 facilities and may have sightline obstruction and safety issues to both motorists (including GMB drivers) and pedestrians? Please note the comment of TD Traffic	As coordinated with TD/TENTE, there are no specific requirements in TPDM for the minimum separation between the run-in / out and pedestrian crossing. As updated in Para. 3.5.3 – 3.5.4 in the TIA under Appendix H , the level of conflicts among the vehicular and pedestrian movements are expected to be low, whilst the development traffic will travel to / from north of Hang Tau Road and the pedestrian traffic will use the cautionary crossing and GMB layby in the south of the run-in / out. Supplementary traffic signs (TS460)

	Departmental Comments	Responses to Comments
	<p>Engineering NT Division on this drawing as well and provide a comprehensive design for consideration.</p>	<p>and road markings (RM1141) will be provided on both directions of Hang Tau Road as shown in Drawing No. 3.2 of the TIA to alert motorists the proposed pedestrian crossing.</p>  <p>The drawing is a site plan showing a section of Hang Tau Road. It includes a pedestrian crossing with a zebra crossing and a pedestrian crossing sign (TS400). Labels indicate a '2.0 FOOTPATH & 7.3M CARRIAGEWAY' on both sides of the road. Other features include a 'RUN-IN/OUT & PEDESTRIAN ENTRANCE', a 'PEDESTRIAN CROSSING', a 'BARRIER-FREE PEDESTRIAN ACCESS ROUTE', a 'GMB LAYBY', and a 'PASSENGER QUEUING AREA'. The drawing also shows various road markings and signs, including a 'TS400' sign and a 'TS460' sign. The road is labeled 'HANG TAU ROAD' and 'RM1141'.</p>
7.9	<p>Para. 3.5.2: Please indicate the passenger queuing area for the GMB layby mentioned in your response to comment in drawing 3.2 by a different colour with the wall / fence of the private residential development.</p>	<p>The queuing space for GMB passengers will be about 70m² (2.9m x 24m), which is capable of more than 114 passengers (6 nos. of 19-seater GMB) at a density of 0.6m²/person (LOS C), which is indicated in Drawing No. 3.2 of the TIA under Appendix H.</p>

	Departmental Comments	Responses to Comments
7.10	<p>Para. 3.5.2: Please indicate the access route for the proposed private residential development's residents to access to / from the proposed GMB layby and advise whether such access route is barrier free.</p> <p><u>Extract of Drawing 3.2 in revised TIA</u></p> 	<p>The access route between the development and the proposed GMB layby is indicated on Drawing No. 3.2 of the TIA (enclosed under Appendix H) which is barrier-free.</p>
7.11	<p>Para. 3.5.2: Please advise whether the developer will be responsible for the design, construction and maintenance of the new turnaround facility, which the TD Traffic Engineering NT Division advised you to adopt a priority T-junction and provide the design for their comment. If priority T-junction is adopted, the GMBs would not be able to</p>	<p>Please be clarified that the concerned mini-roundabout was proposed under the other approved S12A Planning Application (No. Y/NE-KTS/13) further south of Hang Tau Road. <u>This roundabout by others</u> is intended to facilitate the turnaround of GMB along Hang Tau Road.</p>

Departmental Comments	Responses to Comments
<p>turnaround to operate your proposed route between this private residential development and Sheung Shui Station. Please refer to our previous comment advising the applicant to consider to provide new turning space / roundabout within this private residential development for 8m GMBs to operate between this development and Sheung Shui Station.</p> <p><u>Extract of TIA Annex E – Swept Path Analysis for GMBs</u></p>  <p>The diagram shows a street layout with various features labeled: 'PROPOSED GMB LAYBY' (a green rectangular area), 'PROPOSED ACCESS FOR AREA (A)' (a red dashed line), and 'SETBACK AREA RESERVED FOR FUTURE ROAD WIDENING AT HANG TAU ROAD' (a pink shaded area). Other labels include 'TS', 'PH', 'FOOTPATH', 'COMMUNAL LANDSCAPE', 'RETAIL', and 'Road'. A scale bar indicates 7 = 930.</p>	<p>As updated in Para 4.2.4 – 4.2.6 in the TIA under Appendix H, it is understood that the design of the turnaround facility is currently under discussion between TD and the applicant of the other application. Whether it is an external mini-roundabout or any other form of turnaround facilities, it is understood that a turnaround to facilitate the routing of GMB will be available upon the completion of the other development.</p> <p>In case that <u>this permanent GMB turnaround by others</u> is not completed on time for the intake of the subject application site, the GMB can still turn around near the south of Hang Tau Road Public Toilet with swept path analysis in Annex E of the TIA as an alternative arrangement based on existing road layout, subject to the GMB trial run on-site.</p> <ul style="list-style-type: none"> 8m GMB U-turn near Hang Tau Road Public Toilet (Temporary Arrangement)  <p>The diagram shows a street layout with various features labeled: 'Hang Tau Road Public Toilet', 'Road', and 'Road'. A green dashed line indicates the proposed path for the 8m GMB U-turn. An inset photo shows the actual location of the Hang Tau Road Public Toilet with a red arrow indicating the proposed U-turn path.</p> <p>This temporary turn-around arrangement is comparable to the current operation of GMB 50A near Kam Tsin Village and Kwu Tung Market with a similar service level of 10-15 minutes during peak hours, as shown in the following swept path analysis in Annex E of the TIA:</p>

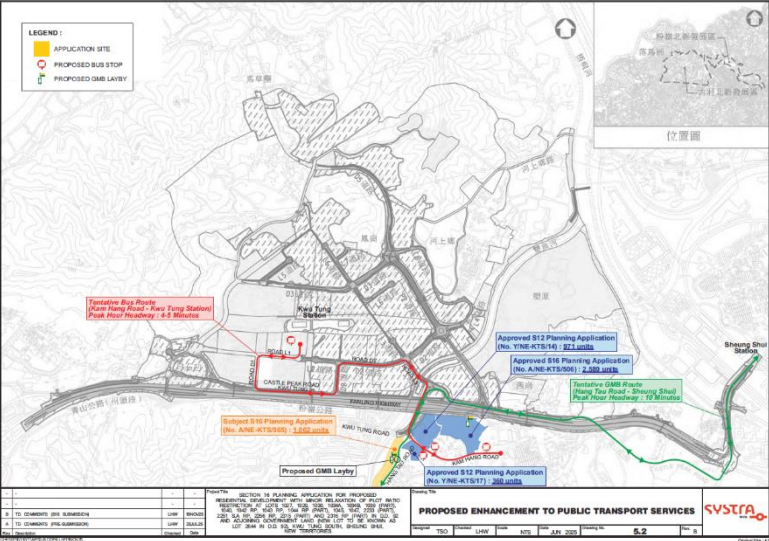
	Departmental Comments	Responses to Comments
		<p>Existing Turn-around Arrangement for GMB 50A</p> 
7.12	Para. 3.5.2: While we note from the response of the applicant that they will be responsible for the design and construction of their proposed new GMB layby and passenger queuing area at their own costs, they have not addressed our enquiry on management and maintenance and associated costs for these facilities. Please advise.	Please be clarified the proposed GMB layby and passenger queuing area, which are indicated as “Setback Area” in the Master Layout Plan as part of the public footpath, will be handed over to Government Departments for management and maintenance at Government’s cost.
7.13	Para. 3.5.2: Please advise the length of GMB layby and the no. of GMBs which can pick up / set down passengers and stack thereat.	The GMB layby is 24m long and capable of 3 nos. of GMB vehicles stacking for boarding and alighting passengers.
7.14	Para. 5.2.7: According to MTRCL, the tentative completion date of the new Kwu Tung Station (East Rail Line) which will be connected with Sheung Shui Station will be completed in end 2027. In additional to Sheung Shui and Kwu Tung, it is foreseeable that the residents of this proposed private residential development will travel to / from Kwu Tung Station. Please revise your modal split which include Sheung Shui and Yuen Long only.	<p>The directional splits of Sheung Shui (80%) and Yuen Long (20%) are reflecting to the travel demands to / from NT East and NT West respectively. The travel demands to / from NT East and NT West can both use the future Kwu Tung Station with East Rail Line (by 2027) and Northern Link (by 2034) respectively.</p> <p>The proposed enhancement to Public Transport Services will also expand</p>

	Departmental Comments	Responses to Comments
		the catchment of Kwu Tung Station to cope with the principle of “using railways as the backbone of HK's public transport system”.
7.15	<p>Para. 5.2.9 – 5.2.10:</p> <ul style="list-style-type: none"> - Please see our comments on your proposed new GMB layby and turn around facilities in Section 3.5 above as well as the comments provided by TD TENT, and revise these 2 paragraphs and drawing 3.2. - The proposed GMB route between the new GMB layby of the proposed development duplicates with the existing GMB 50K. Please revise it as short working route of GMB 50K and follow up our above advice on provision of turnaround facilities for this short working route within the private residential development to enable its operation. - The advice provided by TD TENT on conversion of your proposed roundabout for GMBs to a priority T-junction seems would not allow GMBs to turnaround thereat. Please follow up and advise. 	<ul style="list-style-type: none"> - Noted. Please refer to our response in RtoC Item 7.11. - Para. 5.2.9 in the TIA enclosed under Appendix H is revised with a short working route of GMB 50K serving the new GMB layby, as well as the temporary GMB turnaround near Hang Tau Road Public Toilet, in case of any programme mismatch for the permanent GMB turnaround by OTHERS. - As coordinated with TD/TENTE, please refer to our response in RtoC Items 7.2 and 7.11 for the temporary and permanent arrangement of GMB turnaround facilities.
7.16	<p>Para. 5.2.11:</p> <ul style="list-style-type: none"> - Please advise the programme and anticipated completion date of the quoted Kam Hang Road widening works for the operation of double decker buses, and whether these works would be capable to be completed before the intake of your proposed development for catering the traveling needs of the residents timely. 	<ul style="list-style-type: none"> - Please be clarified that the Kam Hang Road widening works is proposed under the <u>approved S16 Planning Application (No. A/NE-KTS/506) by OTHERS</u>. <p>The detailed design of the associated road improvement works on Kam Hang Road have been already submitted to Government Departments by OTHERS and currently under implementation.</p> <p>Based on the assumption of the TIA enclosed under Appendix H, the widening of the Kam Hang Road and the associated works for the operation of the franchised bus will be completed and available for the proposed development on the subject application site.</p>

	Departmental Comments	Responses to Comments
	<ul style="list-style-type: none"> The Bus & Railway Branch Bus Team will provide comment on your proposed new franchised bus route between Kam Hang Road and Kwu Tung North. 	<ul style="list-style-type: none"> Noted.
7.17	<p>Para. 5.2.14:</p> <ul style="list-style-type: none"> Your proposed new bus terminus at Kam Hang Road would not have sufficient capacity to allow the operation of your proposed “13 nos. buses”. Please advise the length of your quoted Kam Hang Road bus terminus, size of the passenger queueing area and max. no. of passengers who can queue thereat and the max. no. of buses which would be able to pick up & set down passengers at this bus terminus. For Kwu Tung NDA, the new Kwu Tung North Area 25 PTI will be fully utilized by the new franchised bus routes as per the settled FPP programme 2025/26. Please provide statistical analysis on the fleet size of your proposed new bus route between Kam Hang Road and Kwu Tung Station for the consideration of the Bus & Railway Branch (bus team) and NTRO of TD and propose alternative terminus / terminating point in KTN NDA for consideration. The Bus & Railway Branch Bus Team will provide comment on your proposed new franchised bus route between Kam Hang Road and Kwu Tung North. 	<ul style="list-style-type: none"> Please be clarified that the Bus / GMB layby at Kam Hang Road is proposed under the <u>approved S16 Planning Application (No. A/NE-KTS/506) by OTHERS</u>, which is 60m long according to the submission to Town Planning Board. It is understood that the detailed design of the bus layby and the associated road improvement works on Kam Hang Road have already been submitted to Government Departments by OTHERS and currently under implementation. In view of the future population intake in Kwu Tung South, the proposed bus route between Kam Hang Road and Kwu Tung Station can expand the catchment of Kwu Tung Station and cope with the principle of “using railways as the backbone of HK's public transport system”. The route was proposed and approved under <u>S16 Planning Application (No. A/NE-KTS/506) by OTHERS</u>. It is <u>understood that Kam Hang Road widening and improvements are currently being implemented</u>. Noted.
7.18	<p>Para. 5.2.15:</p> <ul style="list-style-type: none"> The proposed GMB route between the new GMB layby of the proposed development duplicates with the existing GMB 50K. Please revise it as short working route of GMB 50K and follow up our above advice on provision of turnaround facilities for this short working route within the private residential development to enable its operation. 	<ul style="list-style-type: none"> Para. 5.2.15 and Table 5.5 in the TIA enclosed under Appendix H are revised with a short working route of GMB 50K serving the new GMB layby. <p>Please also refer to our response in RtoC Item 7.11 for temporary GMB turnaround near Hang Tau Road Public Toilet, as identified in Paras. 4.2.4 – 4.2.6 in the TIA.</p>

	Departmental Comments	Responses to Comments
	<ul style="list-style-type: none"> - The advice provided by TD TENT on conversion of your proposed roundabout to a priority T-junction seems would not allow GMBs to turnaround thereat. Please follow up and advise. - Please provide swept path analysis on the proposed routing of the new franchised bus route for consideration. 	<ul style="list-style-type: none"> - As coordinated with TD/TENTE, please refer to our response in RtoC Items 7.2 and 7.11 for the temporary and permanent arrangement of GMB turnaround facilities. - The swept path analysis of 12.8m double decker bus are extracted in Annex E of the TIA.
7.19	Para. 6.1.4 – 6.1.6, 6.1.10 – 6.1.13: Please note our above comments and revise these paragraphs.	Noted. The comments on public transport operations have been incorporated in the above R-to-C items and in the TIA enclosed under Appendix H , including the temporary and permanent GMB turnaround at Hang Tau Road.
	<u>Comments from BRB Rail Team</u>	
7.20	No further comment.	Noted with thanks.
	<u>Comments from BRB Bus Team</u>	
7.21	R-to-C Item 4.29 and Para. 5.2.1: Please include the sensitivity test for the worst-case scenario in the TIA.	For the worst-case scenario, the <u>average daily mechanised trips per person for all-purpose trips of 1.83</u> is adopted to the Subject Application Site in the sensitivity test as shown in Table 5.4 of the TIA under Appendix H .
7.22	R-to-C Item 4.30 and Para. 5.2.2: Please adopt a higher peak hour factor as a sensitivity test for the worst-case scenario.	Under the sensitivity test for worst-case scenario, the average trip rate becomes $1.83 \times 12\% \times 0.9$ (AM outbound / PM inbound) = <u>0.1976 trips per person</u> , which is almost equivalent to <u>20 trips per 100 residents</u> .
7.23	R-to-C Item 4.31 and Para. 5.2.4: Please make use of the modal split stated in 2021 Population Census.	Noted. The <u>public transport modal split of 80%</u> is adopted with reference to the 2021 Population Census under the sensitivity test for worst-case scenario.
7.24	R-to-C Item 4.32 and Para. 5.2.6: Please update the table with the sensitivity test for the worst-case scenario.	The sensitivity test for worst-case scenario is included in Table 5.4 of the TIA under Appendix H with the more conservative assumptions of <u>daily trip rate</u> and <u>PT mode share</u> for the public transport demand from the Proposed Development.

	Departmental Comments	Responses to Comments																					
		<table> <tr> <th></th><th>Public Transport Assessment in TIA Table 5.4</th><th>Sensitivity Test for Worst-Case Scenario</th></tr> <tr> <td>Estimated Population (Proposed Development)</td><td>= 2,868</td><td>= 2,868</td></tr> <tr> <td>Average Daily Mechanized Trips per person</td><td>= 1.83 – 0.22 = 1.61</td><td>= 1.83 (Item 7.21)</td></tr> <tr> <td>Peak Hour Factors</td><td>= 12%</td><td>= 12%</td></tr> <tr> <td>Estimated outbound trip rate during AM peak hour</td><td>= 1.61 x 12% x 0.9 = 0.1739</td><td>= 1.83 x 12% x 0.9 = 0.1976 (Item 7.22)</td></tr> <tr> <td>PT Modal Split</td><td>= 70%</td><td>= 80% (Item 7.23)</td></tr> <tr> <td>Estimated PT demand during AM peak hour</td><td>= 2,868 x 0.1739 x 70% = 350</td><td>= 2,868 x 0.1976 x 80% = 455 (Item 7.25)</td></tr> </table>		Public Transport Assessment in TIA Table 5.4	Sensitivity Test for Worst-Case Scenario	Estimated Population (Proposed Development)	= 2,868	= 2,868	Average Daily Mechanized Trips per person	= 1.83 – 0.22 = 1.61	= 1.83 (Item 7.21)	Peak Hour Factors	= 12%	= 12%	Estimated outbound trip rate during AM peak hour	= 1.61 x 12% x 0.9 = 0.1739	= 1.83 x 12% x 0.9 = 0.1976 (Item 7.22)	PT Modal Split	= 70%	= 80% (Item 7.23)	Estimated PT demand during AM peak hour	= 2,868 x 0.1739 x 70% = 350	= 2,868 x 0.1976 x 80% = 455 (Item 7.25)
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7.25	Para. 5.2.8: Please update with the sensitivity test for the worst-case scenario.	For the worst-case scenario in the sensitivity test, there will be up to <u>455 passengers per hour</u> during the AM and PM peak hour for the future intake of 2,868 residents by the Subject Application Site.																					
7.26	R-to-C Item 4.33 and Para. 5.2.11: Please advise whether there is terminating point and adequate terminating facilities for the proposed new franchised bus route at both the origin and destination (i.e. Kam Hang Road and Kwu Tung Station).	Please be clarified that the Bus / GMB layby at Kam Hang Road and the tentative bus route were both proposed under the <u>approved S16 Planning Application (No. A/NE-KTS/506) by OTHERS</u> . The bus / GMB layby is about 60m long according to the submission to Town Planning Board.																					
7.27	R-to-C Item 4.34 and Para. 5.2.12: Please update the table with the sensitivity test for the worst-case scenario.	Noted. Table 5.5 in the TIA under Appendix H is updated with the more conservative public transport demand from the Proposed Development as the sensitivity test for the worst-case scenario in R-to-C Item 7.24.																					
7.28	R-to-C Item 4.35 and Para. 5.2.12-Table 5.5: <ul style="list-style-type: none"> - As Yuen Long is a popular destination for the commuters of North District, it is expected that the residents of the proposed development would take Route 76K as the direct service to / from Yuen Long although its existing bus stops are marginally beyond walking distance from the proposed development. 	<ul style="list-style-type: none"> - The spare capacity of Bus Route 76K is adopted to serve part of the public transport demand arising from the proposed development as updated in Para. 5.2.14 and Table 5.5 in the TIA under Appendix H. 																					

	Departmental Comments	Responses to Comments
	<p>Please assess whether the spare capacity of Route 76K can be utilized to serve part of the public transport demand arising from the proposed development.</p> <ul style="list-style-type: none"> Please advise the estimated fleet size for the proposed new franchised bus route. The Drawing No. 5.2 does not mention whether there are any other proposed bus services for the Other Planned Developments and the relevant details and advise how the proposed new bus service can serve the Other Planned Developments in the area taking into account the routing of the proposed new service, location of the Other Planned Developments and etc. Please further advise. 	<ul style="list-style-type: none"> The tentative bus route was proposed under the <u>approved S16 Planning Application (No. A/NE-KTS/506) by OTHERS</u>, of which the service level was assumed with 4-5 minute headway and a fleet size of 3-4 DD buses. The planned developments by OTHERS along Kam Hang Road will be within the catchment of new bus route as indicated in Drawing 5.2-A: <ul style="list-style-type: none"> No. A/NE-KTS/506: 2,589 units and PPOF 2.7 = 7,000 population No. Y/NE-KTS/14: 971 units and PPOF 2.7 = 2,600 population No. Y/NE-KTS/17: 360 units and PPOF 2.7= 1,000 population 

	Departmental Comments	Responses to Comments																		
	<ul style="list-style-type: none"> To achieve the long-term target of attaining zero vehicular emissions in the transport sector, the use of electric / new energy buses with carrying capacity of about 120 passengers is expected. Besides, if the occupancy is over 75%, the service level of the proposed franchised bus route should be enhanced according to the guideline. Please revisit by assuming the capacity of double-decker buses as 120 with 75% maximum capacity. 	<ul style="list-style-type: none"> It is noted from the guideline that the service level of bus route should have an occupancy between 75-90% within the busiest 30-minute during peak periods, otherwise service enhancement (>90%) or reduction (<75%) will be considered. <p>Whilst the more conservative public transport demand is adopted from the sensitivity test in R-to-C Item 7.24, the anticipated service level of 12.8m double-decker (DD) bus are reviewed to be <u>120 passengers with 90% maximum capacity</u> per bus for the future use of electric / new energy buses.</p> <p>The above capacity assumption (120 x 90%=108 passengers) is equivalent to 70-75% maximum capacity of the conventional DD buses (150 passengers).</p>																		
7.29	R-to-C Item 4.36 and Para. 6.2.2: Please revisit above comment and then reach a new conclusion.	<p>For the worst-case scenario of public transport assessment, the more conservative public transport demand in R-to-C Item 7.24 and the discounted public transport capacity in R-to-C Item 7.28 are both adopted in the sensitivity test as shown in Table 5.5 in the TIA under Appendix H and extracted below:</p> <table border="1"> <thead> <tr> <th>Private Residential Developments</th><th>Anticipated Population Intake</th><th>Passenger Demand (pax/hr)</th></tr> </thead> <tbody> <tr> <td>Application Site at Hang Tau Road</td><td>2,868 residents</td><td>455</td></tr> <tr> <td>Other Planned Developments</td><td>10,600 residents</td><td>1,290</td></tr> <tr> <td>Total</td><td>13,468 residents</td><td>1,745</td></tr> </tbody> </table> <table border="1"> <thead> <tr> <th>Public Transport Service</th><th>Anticipated Service Level</th><th>Public Transport Capacity (pax/hr)</th></tr> </thead> <tbody> <tr> <td>Short-Working Route of GMB 50K (Hang Tau Road – Sheung Shui)</td><td>10-minute headway (6 nos. of 19-seater GMB)</td><td>19 x 6 = 110 pax/hour</td></tr> </tbody> </table>	Private Residential Developments	Anticipated Population Intake	Passenger Demand (pax/hr)	Application Site at Hang Tau Road	2,868 residents	455	Other Planned Developments	10,600 residents	1,290	Total	13,468 residents	1,745	Public Transport Service	Anticipated Service Level	Public Transport Capacity (pax/hr)	Short-Working Route of GMB 50K (Hang Tau Road – Sheung Shui)	10-minute headway (6 nos. of 19-seater GMB)	19 x 6 = 110 pax/hour
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	Departmental Comments	Responses to Comments											
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		It can be shown that the service levels of existing and proposed Bus & GMB route(s) can adequately serve the anticipated public transport demand in Kwu Tung South. As such, there is <u>no change to the conclusion</u> in the TIA.											
7.30	R-to-C Item 4.37 and Drawing 3.1: Please refer to the comment of item 4.33.	As per R-to-C Item 7.26, please be clarified that the Bus / GMB layby at Kam Hang Road is proposed under the <u>approved S16 Planning Application (No. A/NE-KTS/506) by OTHERS.</u>											
8.	Comments from Highways Department												
8.1	The cross-sections as shown in RtoC table do not match with the plan in Drawing Nos. 3.1 and 3.2 of the Traffic Impact Assessment. Please clearly indicate the proposed footpath and carriageway to be widened in the plan.	<p>With reference to the approved S12A Planning Application (No. Y/NE-KTS/15), the proposed extent of road improvement works will be covered by the “Setback Area” along Hang Tau Road abutting the Application Site.</p> <p>As shown by the relevant plan and cross sections in Drawing No. 3.3 in the TIA enclosed under Appendix H, the proposed setback areas are indicated for the road improvement works along Hang Tau Road, which includes:</p> <ul style="list-style-type: none">- 7.3m carriageway- 2.0m footpath abutting site boundary- A GMB layby on Hang Tau Road- A cautionary pedestrian crossing across Hang Tau Road <p>Further details of road drain and public lighting design will be submitted with the General Building Plans following the approval of S16 planning</p>											

	Departmental Comments	Responses to Comments
		application.
8.2	Please advise if the setback area is managed and maintained by the private developer.	The setback area, which includes the public footpath and GMB layby outside the development, will be handed over for management and maintenance by the Government at their own costs.
8.3	The proposed access arrangement, if any, of the application site should be commented and approved by TD.	Noted. As coordinated with TD/TENTE, the access arrangement is highly comparable with the approved S12A Planning Application (No. Y/NE-KTS/15).
8.4	For any proposed improvement works on public roads approved by TD and will be handed over to TD / HyD for management and maintenance, the applicant should ensure the works are designed and constructed in accordance with the latest version of HyD Standards and up to the satisfaction of TD and HyD. The proposed works design shall be circulated to TD and HyD for comments and approval.	Noted. The detailed design of associated road improvement works will be submitted with the General Building Plans following the approval of S16 planning application.
8.5	If any access on public road is approved by TD, the applicant should ensure a run-in / out is constructed in accordance with the latest version of HyD Standard Drawings no. H1113 and H1114, or H5133, H5134 and H5135, whichever set is appropriate to match with the existing adjacent pavement.	Noted.
8.6	Adequate drainage measures shall be provided to prevent surface water running from the application site to the nearby public roads and drains.	Noted.
9.	Comments from Urban Design Unit, Planning Department	
	<u>Urban Design and Visual</u>	
9.1	The current submission involves minor relaxation of PR restriction from 2 to 2.012 due to refined application site boundary while maintaining the same GFA of 39,400m ² . As compared to the	Noted.

	Departmental Comments	Responses to Comments
	indicative scheme under rezoning application, the applicant has proposed following design merits to refine layout under current submission: (i) consolidating the original six towers to three towers in order to achieve further setback from the western site boundary facing Sheung Yue River from 15m - 65m to 25m - 70m; (ii) widening of building gaps from 15m/25m to 20m/25m; (iii) widening of tree buffer zone from 4m to 4m - 8m along western site boundary; and (iv) maintaining a 3m width of peripheral planting along eastern site boundary. In view of the aforementioned design merits and noting that the proposed BH does not exceed the restriction as permitted under OZP, we have no adverse comment on the current application from visual perspective.	
	<u>Air Ventilation</u>	
9.2	The development proposal does not fall within the criteria requiring AVA in accordance to the Technical Circular No. 1/06 on AVA.	Noted.
10.	Comments from Landscape Unit, Planning Department	
10.1	With reference to the aerial photo of Nov 2024, the application site ("the Site") is located in an area of rural fringe character dominated by low-rise residential developments, village house, river channel, temporary structures, farmlands, and scattered tree groups. Comparing the aerial photos of Nov 2024 and Mar 2022, there is no significant change to landscape character of the Site and the surrounding area. The proposed minor relaxation of Plot Ratio (PR) restriction is considered not entirely incompatible with the landscape setting in the proximity.	Noted.
10.2	With reference to DPO's site photos taken on 16.9.2025, the Site is vacant. Trees and vegetation are observed mainly scattered within and along the peripheries of the Site. In comparison with the previous scheme (i.e. s.12A rezoning application No. Y/NE-KTS/15,	Noted.

	Departmental Comments	Responses to Comments
	which was partially agreed by the Rural and New Town Planning Committee on 28.10.2022), there is no significant change to the scheme under the subject application. With reference to the Tree Survey and Preservation Proposal of the submission, the total nos. of trees surveyed (i.e. 275), to be transplanted (i.e. 2) and to be felled (i.e. 239) remain unchanged, the nos. of trees to be retained increased (i.e. from 10 to 11), the nos. of dead trees to be felled reduced (i.e. from 24 to 23), and the new trees to be planted increased (i.e. from 239 to 261). No Old and Valuable Trees (OVT) or trees with high conservation value are identified within the Site.	
10.3	The applicant clarified that (i) the existing planting area ("EPA") and compensatory planting area ("CPA") arrangements were agreed upon by AFCD and approved by Town Planning Board in previous planning applications; and (ii) trees no. 74, 75, 77 to 81 within the EPA will remain unaffected. We have no adverse comment on the proposed Landscape Master Plan and noted that not less than 2,868 m ² open space is proposed for the anticipated population of 2,868 as shown on the Open Space Demarcation Plan.	Noted.
10.4	The applicant is advised that approval of the application does not imply approval of tree works such as pruning, transplanting and felling. Application for any tree works should be submitted direct to relevant authority(ies) for approval.	Noted.
11.	Comments from Fire Services Department	
11.1	Please be informed that we have no specific comment on the proposal subject to fire service installations and water supplies for firefighting being provided to the satisfaction of the Director of Fire Services.	Noted.
11.2	Detailed fire safety requirements will be formulated upon receipt of the formal submission of general building plans.	Noted.

	Departmental Comments	Responses to Comments
11.3	Furthermore, the provision of emergency vehicular access in the subject work shall comply with the requirements as stipulated in Section 6, Part D of the Code of Practice for Fire Safety in Buildings 2011.	Noted.
12.	Comments from Architectural Services Department	
12.1	Based on the information provided, it is noted that there is no change to the key development parameters from a previous pre-application submission. From the photomontages provided, it appears that the proposal would have little visual impact to the surrounding environment when compared with a previously approved Notional Scheme. In this regard, we have no comment from architectural and visual impact point of view, subject to PlanD's view.	Noted.
12.2	We understand that PlanD will consider the application holistically and take into account comments / advice from relevant parties / departments / bureaux in relation to the planning intention for the final ruling.	Noted.
13.	Comments from Buildings Department	
13.1	Before any new building works (including containers / open sheds as temporary buildings, demolition and land filling, etc.) are to be carried out on application site, prior approval and consent of the Building Authority should be obtained, otherwise they are unauthorized building works (UBW) under the Buildings Ordinance (BO). An Authorized Person should be appointment as the co-ordinator for the proposed building works in accordance with the BO.	Noted.
13.2	The site shall be provided with emergency vehicular access in accordance with Regulations 5 and 41D of the Building Planning Regulation (B(P)R) respectively.	Noted.

	Departmental Comments	Responses to Comments
13.3	The development intensity shall not exceed the permissible stipulated under First Schedule of B(P)R.	Noted.
13.4	For UBW erected on leased land, enforcement action may be taken by the Buildings Department to effect their removal in accordance with the prevailing enforcement policy against UBW as and when necessary. The granting of any planning approval should not be construed as an acceptance of any existing building works or UBW on the application site under the BO.	Noted.
13.5	If the proposed PR is based on the assumption that gross floor area (GFA) exemption will be granted for green / amenity features and non-mandatory / non-essential plant rooms, etc., the pre-requisites in Practice Note for Authorized Persons, Registered Structural Engineers and Registered Geotechnical Engineers (PNAP) APP-151 and APP-152 should be complied with.	Noted.
13.6	Disregarding car parking spaces, loading and unloading lay-by from GFA calculation under BO will be considered on the basis of the criteria set out in PNAP APP-2 and APP-111 during building plans submission stage.	Noted.
13.7	The ratio of parking spaces for disabled persons specified therein should comply with the ratio of accessible parking spaces required under regulation 72 of B(P)R and Division 3 of the Design Manual: Barrier Free Access 2008.	Noted.
13.8	Recreational facilities may be exempted from GFA calculation under BO if they comply with requirements under PNAP APP-42, 104, 151 and 152.	Noted.
13.9	The headroom of the carpark floor on basement exceeding 5m shall be justified at building plan submission stage.	Noted.

	Departmental Comments	Responses to Comments
13.10	Detailed comments under BO will be provided at building plans submission stage.	Noted.