

Appendix A

Response-to-Comment Table

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COMMENTS FROM RELATED DEPARTMENTS

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1.	<p>Fire Services Department, Corporate Strategy Command, Planning and Development Division, dated 20 March 2025</p> <p>Please be informed that I have no objection in principle to the proposal subject to fire service installations (FSIs) being provided to the satisfaction of the Director of Fire Services.</p> <p>Noted that this is a renewal application, the following supplementary information shall be submitted for our further consideration:</p> <p>(i) A full set of valid F.S. 251(s) covering all the FSIs implemented on the application site shall be provided (e.g. Visual Fire Alarm); and</p> <p>(ii) The provision in some items (e.g. Ventilation/Air Conditioning Control System & Portable Fire Extinguisher) are not consistent with the previous application (i.e. A/NE-LT/756), please verify.</p>	<p>Noted with thanks.</p> <p>Noted, please refer to Appendix B for the full set of valid F.S. 251(s) covering all FSIs implemented on the Application Site for the period 2022-2026.</p> <p>For Visual Fire Alarm System, the RFSIC, Merry China Asia Limited, reported that the inspection of this system was already included under the Fire Alarm System (MFA Item 13) and was duly inspected on 12 December 2025.</p> <p>Noted. Please be advised that the Ventilation/Air Conditioning Control System (under code 31) has been implemented in the Application Site (in Block 1,2 as indicated in the valid F.S. 251 of 2022-2023, 2023-2024, and 2024-2025, and in Block 1,2 & Near Block 3 & 6A in the valid F.S.251 of 2025-2026) (Appendix B refers to).</p> <p>For the Portable Fire Extinguisher, please be advised that the valid F.S. 251 for the period 2022-2026 has been supplemented. Based on the latest FSD Certified Plans dated 20 October 2021, the quantities of Portable Fire Extinguishers are confirmed to align with the latest FS251 Certificate (i.e. total 17 nos.) (Appendix C refers to).</p>
2.	<p>Environmental Protection Department, Environmental Assessment Division, Territory North Group, Sheung Shui, Fanling, Tai Po, dated 10 April 2026</p> <p>We note that a substantiated odour complaint from the vicinity of the site was recorded by our enforcement team in mid-2025. With a view to</p>	

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	<p>understanding the current situation, we would be grateful if the applicant could advise:</p> <p>(i) whether any additional measures have been proposed to mitigate the odour impacts in view of the complaint (e.g. any additional operational procedures like waste handling frequency, manure storage arrangements, cleaning protocols). For clarity and ease of reference, please set out the mitigation measures under two categories: (1) Measures as originally approved under Application No. A/NELT/662; and (2) Any additional measures subsequently implemented in response to the odour complaint and their effectiveness</p>	<p>1) Measures as originally approved under Application No. A/NELT/662</p> <p>Please be advised that the odour control measures as mentioned in Application No. A/NELT/662 are:</p> <p><u>a. Para# 3.6.6 and 3.7.4</u></p> <p>i) Manure collected by operator and stored in underground manure scrape pits with stainless steel cover</p> <p>ii) Regular cleaning by operator</p> <p>iii) Produced wastewater to be diverted to manure scrape pits and collected by tanker twice a week</p> <p><u>b. Para# 3.8.3</u></p> <p>A ventilation system will be installed in order to extract the odour smell in the barns. Exhaust fan will be installed on the rooftop of adult barn and young livestock barn.</p> <p><u>c. Para# 3.8.4</u></p> <p>i) Inspection of the ventilation system and activated carbon filters</p> <p>ii) Spare parts such as air duct, exhaust fan and activated carbon filters will be stored on-site</p> <p><u>d. Para# 3.8.5</u></p> <p>i) Scheduling the wastewater collection period in less sensitive hours</p> <p>ii) Collecting wastewater on a regular basis to avoid excessive amount of collection</p> <p>iii) Properly arranging the route of collection process to reduce the time for collection</p>

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		<p>iv) Carefully installing the pipes into the sewage holding tank and manure scrape pits to avoid potential leakage</p> <p>v) Cleaning the leakage once observed during the collection process</p> <p>vi) Closing any opening of the sewage holding tank and manure scrape pits after the collection</p> <p>vii) Ensuring the pipe at vacuum tanker placed properly prior to leaving the site</p> <p>The above odour control measures are complied with since the operation of CityUHK Farm.</p> <p>2) Any additional measures subsequently implemented in response to the odour complaint and their effectiveness</p> <p>On top of the odour control measures mentioned in Application No. A/NELT/662, the following additional measures are implemented in response to odour complaint:</p> <p>a. Biochar: Application to floors</p> <p>CityUHK Farm has worked on the use of biochar, produced at EcoPark at Tuen Mun. Biochar is highly absorbent, nearly as much so as activated charcoal, and absorbs ammonia and other malodorous sulphur containing manure gases at source when spread on the floor.</p> <p>The biochar is applied twice a day when the cows are out of their pens for milking. Increasing the amount of biochar applied is more effective than increasing the frequency of application, as an increased application amount provides greater surface area for absorption of malodorous gases and alkalizes the cattle manure more, hence reducing bacterial degradation and production of gases. We will increase the application rate of biochar during the wet season in 2026,</p>

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	<p>(ii) any licenses are required/ have been obtained for the operation of the proposed development, including those related to environmental matters (e.g. Waste Disposal) or the keeping of Jersey cows.</p>	<p>however it should be noted that all of the odour complaints in 2024 and 2025 coincided with disruption in the supply of biochar from EPD Ecopark or Animal Waste Composting Plant i.e. even at current application amount it is effective for odour prevention.</p> <p>b. Cattle slurry is now placed directly into airtight transportable leakproof plastic containers. This prevents:</p> <p>i) The escape of malodorous gases during the filling of the wheeled bins</p> <p>ii) The escape of gases from the previously used bins during storage</p> <p>iii) The release of gases when the bins are emptied into the open tanker lorry, which used to occur on a Monday, Wednesday and Friday afternoon</p> <p>Please refer to Appendix D for the photos of the application of Biochar to floors and airtight transportable leakproof plastic containers.</p> <p>Please refer to Appendix E for the dairy licenses for the operation of the proposed development issued in the year 2023-2026, under the provisions of the Public Health (Animals and Birds) Ordinance (Chapter 139) and the Dairies Regulations.</p> <p>Under Cap. 139D, application for Dairy Licence has to fulfil the following environmental-related requirements:</p> <p>a. plan of the premise;</p> <p>b. particulars of the method for the disposal of effluent from the premise;.</p> <p>c. the floor shall communicate directly, by means of an independent drain, constructed to the satisfaction of the Director, with a covered cement catch-pit;</p> <p>d. the contents of every catch-pit shall be removed not less than once in every 24 hours;</p> <p>e. the effluent from any building or other place in which cattle are kept in any dairy or</p>

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		<p>which is a milk room shall at all times be disposed of to the satisfaction of the Director;</p> <p>f. every building or other place in which cattle are kept in any dairy or to which cattle have access or which is a milk room shall be thoroughly cleansed as often as may be necessary to ensure that the same is at all times clean to the satisfaction of inspector;</p> <p>g. the floor of every such building or other place shall be thoroughly cleansed and all offensive matter removed therefrom not less than once in every 24 hours;</p> <p>Dairy Licence has been obtained with annual renewal since April 2023, thus demonstrating that the above environmental-related requirements have been fulfilled satisfactorily.</p>
3.	<p>Water Supplies Department, New Works Branch, Construction Division, System Planning Section, dated 13 April 2026</p> <p>The submission of the captioned application is considered insufficient to prove and demonstrate that the proposed development would cause no material increase in pollution effect to the Water Gathering Grounds ('WGG'). To review whether the requirement of approved conditions (a) to (c) under Application no. A/NE-LT/756 shall remain valid for the captioned renewal application, specific concerns are provided as follows from the perspective of water resources protection.</p> <p>(1) It is noted that the Applicant discharges the stormwater to temporary storage tank and trucks away. In this connection, the Applicant proposes that the monitoring test is no longer required. However, details about the stormwater management including but not limited to any treatments done to stormwater before discharge to the storage tank, connection and collection process to the storage tank, number, location, capacity and waterproof ability of the storage tank have not been mentioned in the submission. Mitigation measures upon any leakage, spillage and overflow from the stormwater pump pit,</p>	<p>Noted. Please refer to our responses below.</p> <p>Regarding stormwater management, please be advised that the stormwater runoff collected from site is filtered by sand traps before discharging to storage tanks. (Please refer to Appendix F for the Drainage Record Plan which indicated the sand traps provided outside Block 12 & Block 14.) The site stormwater runoff then enter the 2 nos. of underground tanks and be further pumped to the 20 nos. of aboveground storage tanks.</p> <p>The 2 nos. of underground storage tanks are located near block 12 and 14. The capacity of each underground tank is 50m³. The 20 nos. of</p>

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	<p>storage tanks and during transfer and handling of stormwater shall be provided.</p> <p>(2) Further to the above (1), as reiterated from the water quality monitoring programme, it is to demonstrate the long-term commitment on no material increase in pollution effect within the WGG arising from the development. In this respect, the Applicant should provide sufficient information about the effluent management including but not limited to provision of records and summaries of stormwater management during the operation of the development.</p>	<p>aboveground tanks, each of volume 10m³, are located adjacent to the underground storage tanks. The total capacity of the aboveground storage tanks is 200m³.</p> <p>The water levels inside the aboveground tanks are monitored closely with cameras, water level sensors and regular manual inspection. When the water stored reaches certain level, arrangement is made to truck-away the stored stormwater in time.</p> <p>Regarding the mitigation measures upon any leakage, please be advised connection to the aboveground tanks from underground storage tanks are by aboveground heavy-duty flexible pipes. These aboveground pipes, together with the aboveground tanks, connection points etc., are regularly inspected and maintained to ensure there is no leakage. As these items are all above ground and easily visible, any leakage could easily be identified and remedial action could be taken immediately.</p> <p>These tanks are also interconnected to share equally the stormwater load. On the other hand, valves are installed for each storage tank such that any tank with potential leakage could be isolated out and won't affect the rest of the system.</p> <p>400mm high peripheral curbs are installed around the site to block off stormwater from surrounding slopes, thus minimize stormwater runoff volume within the site and prevent overflow situation.</p> <p>The stormwater surface runoff will be trucked away and not discharge into Lam Tsuen River. Thus, no material increase in pollution effect to Lam Tsuen River is anticipated.</p> <p>Relevant records of the temporary storage tankers for stormwater, vacuum tanker trucking out the stormwaters and vacuum tanker utilization in 2025 have been summarized in Section 2 of the Appendix E Compliance Status to Approval Conditions of Application No. A/NE-LT/756 and Photo of the supporting planning statement.</p>

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