Appendix A

Response-to-Comment table

S16 Application for Proposed Residential Development in an Area Shown as 'Road' at Various Lots in D.D. 221 and Adjoining Government Land, Sha Ha, Sai Kung (No. A/SK-SKT/34) Response to Comments – July 2025

Comments from Related Departments

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1.	Antiquities and Monuments Office, Heritage Conservation Unit, Archaeology Sub-unit, dated 23 May 2025
2.	Environmental Protection Department, Water Quality Management Division, Sewerage Infrastructure Group, Regional Sewerage Infrastructure Planning (HK Island, Tolo Harbour & Port Shelter), dated 4 June 2025
3.	Environmental Protection Department, Water Quality Management Division, Water Quality Management Group, Specific Waste Management and Land Contamination Assessment, dated 4 June 2025
4.	Highways Department, Major Works Project Management Office, Major Works Office (2), dated 13 June 2025
5.	Planning Department, District Planning Branch, New Territories District Planning Division, Sai Kung & Islands District Planning Office, dated 13 June 2025
6.	Lands Department, Lands Administration Office, District Lands Office, Sai Kung, dated 20 June 2025 8
7.	Transport Department, NT Regional Office, Traffic Engineering (NTE) Division, Housing & Planning
	Section, dated 20 June 20258
8.	Drainage Services Department, Operations & Maintenance Branch, Mainland South Division, Mainland South 6 (Tseung Kwan O, Sai Kung and Yau Tong), dated 30 June 2025

COMMENTS FROM RELATED DEPARTMENTS

No.	Comm	ents	Responses
1.	Consei	nities and Monuments Office, Heritage rvation Unit, Archaeology Sub-unit, 23 May 2025	
	Archae	ological Impact Assessment	
	Section	3.2.1 & Figure 3.7	
	1.	Our previous comment 1 refers, Please check, other than the 'Approximate area of archaeological interest 具考古研究價值的大致範圍', please also mark clearly the current boundary of 'Sha Ha Site of Archaeological Interest 沙下具考古研究價值的地點' on the figure.	Noted. The current boundary of the 'Sha Ha Site of Archaeological Interest 沙下具考古研究價值的地點' is supplemented in Figure 3.7. Please refer to Appendix B for the revised Archaeological Impact Assessment (AIA).
	Section	13.2.1	
	2.	Our previous comment 2 refers. In Section 3.2.1, please check if archaeological data of T3 can be assessed as it is in the south vicinity of the subject site.	Noted, the archaeological data of T3 is supplemented in Section 3.2.1.
	3.	Our previous comment 2 refers. Section 3.2.1 states that 'a cultural layer of Ming-Qing dynasties is widespread in the north part of the investigation area in 1998 where T19 and T4 located.' It also states, 'T4 only includes the agricultural soil layer and the sterile layer.' Please check the accuracy of the two statements and whether the first statement needs amendments. According to the 1998 report (AMO report ref. SK45), the cultural layer of Ming-Qing dynasties (Layer 3) does not exist in T3, T4 or T19. Instead, a Qing cultural layer (Layer 2) exists in T3 and T19.	Noted. Section 3.2.1 is revised accordingly - T4 only includes the agricultural soil layer (Layer 1) and the sterile layer, while T3 and T19 include an approximate 20cm agricultural soil layer, a 5cm-10cm greyish sandy clay layer which is identified as the cultural layer of Qing dynasty and a sterile layer with gravels and yellow clay.
	4.	Please check to ensure the indicative locations of T4 and T8 are correctly shown at Appendix B. Please also supplement the archaeological data of T8 which was in the close vicinity of the study area.	The indicative locations of T4 and T8 at Appendix B-3 of the revised AIA have been rectified. The archaeological data of T8 is supplemented in Section 3.2.1.
	5.	Our previous comment 2 refers. In Section 3.2.1, please check if 'Both T19	Noted and revised accordingly.

No.	Comm	ents	Responses
		contains 3 layers' should be revised as 'T19 contains 3 layers'	
	6.	Footnotes 3 & 4. Please check if the footnote '香港文康廣播局古物古蹟辦、湖南省文物考古研究所. (1998). 香港西貢區(SHA HA)遺址考古調查告. 'should read as '香港文康廣播局古物古蹟辦、湖南省文物考古研究所. (1998). 香港西貢區沙下(SHA HA)遺址考古調查報告.'	Noted and revised.
	Section	3.2.2 & Appendix B	
	7.	Our previous comment 4 refers. Please cite the reference for the 2001-02 rescue excavation and indicate the respective area names (Areas A to E) of the rescue excavation at Appendix B. Besides, please also check to ensure the indicative test pit locations are correct.	Please refer to the added footnote 6 for the reference for the 2001-02 rescue excavation. The respective areas of the rescue excavation have been supplemented in Section 3.2.2 and Appendix B-1 of the revised AIA.
	8.	Please supplement which areas among Areas A to E of the rescue excavation were close to the study area and the archaeological findings from these areas.	Area D and Area C amongst the rescue excavation areas were close to the Study Area. Please refer to Section 3.2.2 for the supplemented related information.
	Section	3.2.3 & Appendix B	
	9.	Please check and clarify if 13 instead of 24 test pits were excavated in Area F.	Please be advised that 13 test pits were excavated in Area F, and Section 3.2.4 is revised accordingly.
	10.	Please indicate the group number (Groups I, II, III) of the test pits on the plan to show the locations of these groups against the study area.	The group number of test pits is indicated in Appendix B-2 of the revised AIA to show the locations of these groups against the study area.
	11.	Please supplement if there was any artefact yielded from test pits 159/151	Noted and supplemented in Section 3.2.3. While blue-and-white porcelain sherds were found in the nearby test pit 159/141, there is no artefact yielded from test pit 159/151.
	Section	4.1.1	
	12.	Point (1), it reads "Original and in-situ deposit with archaeological significance were not found within the Study Area in previous archaeological works." Please specify which part of the Study area this point is referring to.	Noted, Point (1) is revised as "were not found at the eastern part of the Study Area".

No.	Comments	Responses
	Section 4.1.2	
	13. Please define what is "2002 Rescue and survey" and revise the relevant section and Appendix B as appropriate.	"2002 Survey" is elaborated in Section 3.2.3 and Appendix B of the revised AIA.
		The relevant section is revised to "2002 Rescue", which refers to the large-scale rescue carried out between 2001 and 2002 (discussed in Section 3.2.2), and "2002 Survey" (the archaeological survey at Sha Ha conducted at Area F in 2002 as discussed in Section 3.2.3). Appendix B of the revised AIA is also amended to indicate the 2002 Rescue Areas and the 2022 Survey groups respectively.
	Section 4.2	
	14. Our previous comment 9 refers. A thin cultural layer with archaeological potential dated to Ming-Qing dynasties likely exists in the subject site. Please verify whether archaeological remains dated before 1800 - including those from the Ming and Early to Middle Qing periods - are considered antiquities under the Antiquities and Monuments Ordinance and the archaeological potential of the Study Area would be higher than 'low'.	Noted. Please refer to Sections 4.2.1 - 4.2.3 for the detail.
	<u>Section 4.2.2</u>	
	15. Our previous comment 9 refers. Given your acknowledgement of similar geological characteristic and the potential for previously undetected cultural layers in the Non-excavation Area, please advise and confirm that the proposed further archaeological action would sufficiently mitigate potential impacts on site and ensure that artifacts and features (including those from the Ming-Qing periods) are properly documented and preserved.	Please be advised that Section 4.2.2 is revised accordingly as " However, as the previous archaeological works did not cover the full range of the Study Area, archaeological potential of pre-historic period still cannot be ruled out within the Study Area." Please be advised that the proposed further archaeological action, including an Archaeological Action Plan and Archaeological Survey, would be sufficient to mitigate potential impacts on the site and ensure that artifacts and features (including those from the Ming-Qing periods) are properly documented and preserved. Please refer to Section 5.2 for the detail of the mitigation measures.

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No.	Comments	Responses
	Section 5.2	
	16. Our previous comment 10 refers. Other than conducting an archaeological survey to assess the archaeological potential of uncertain areas, please also verify whether archaeological remains dated before 1800, including those from the Ming-Qing periods, should be properly mitigated.	Section 5.2 has been revised accordingly.
	17. According to 5.2.2, "a collection of field data by means of archaeological survey for the archaeological impact assessment should be considered". But 5.2.3 stated that an AAP stating the detailed contents of the Archaeological Watching Brief including should be provided" Please clarify that an archaeological survey would be conducted.	Please be advised that an archaeological survey will be conducted after the approval of the subject Planning Application, and Section 5.2.3 is revised accordingly.
	18. Further to our comment to Section 4.2 as above, the mentioned cultural layer and its implications should be explicitly addressed in the recommended further archaeological action, so as to ensure that evaluation of the site's archaeological value will not be undermined.	Noted.
	19. Please elaborate and confirm your mentioning, "further archaeological action is recommended to be taken during the construction phase" is appropriate to mitigate the impact arising from the proposed development on the SAI. Please indicate clearly what is the "further archaeological action" recommended for consideration by AMO.	Please be advised that further archaeological action is recommended to be taken before the construction phase to mitigate the impact arising from the proposed development on the SAI. A collection of field data by means of Archaeological Survey is recommended as the further archaeological action for consideration by AMO. Please refer to revised Section 5.2.2 for the details.
	Appendix B & Layout Plan at Appendix C	
	20. Please demarcate the boundary of Sha Ha SAI.	Noted. The boundary of Sha Ha SAI is indicated on the plans at Appendix B and Appendix C of the revised AIA.
	<u>Overall</u>	
	21. Please check and confirm the accuracy of the information for this assessment to ensure the validity of the assessment results.	Noted.

No.	Comments	Responses
2.	Environmental Protection Department, Water Quality Management Division, Sewerage Infrastructure Group, Regional Sewerage Infrastructure Planning (HK Island, Tolo Harbour & Port Shelter), dated 4 June 2025	
	Sewerage Impact	
	1. Section 3.3.1 & Table 3.2 – The unit for the additional flow from outdoor swimming pool of the proposed development should be L/s instead of m3/day.	Noted and revised. Please refer to Appendix C for the revised Sewerage Impact Assessment (SIA).
	 Section 3.5.3 Table 3.8 – The title of this table should be 'SKSTW Capacity Check' instead of 'TPSTW Capacity Check'. 	Noted and revised.
	3. Appendix A – Please check whether the backwash flow rate of the swimming pool of Lotus Villas is 4.3L/s or 3.5L/s.	The flowrate is 3.5L/s. Appendix A of the revised SIA has been revised.
	4. Wong Chuk Wan SPS will receive sewage from the Wong Chuk Wan area. Please review whether it is appropriate to adopt the design capacity of Wong Chuk Wan SPS for the hydraulic assessment. You may wish to consult the project team of PWP No. 4431DS to obtain more design details of the SPS (e.g. design pumping capacity of each pump and expected no. of pump in operation based on its proposed catchment).	The project team and the consultant of PWP No. 4431DS was consulted via email and telephone conversation. It is advised that the design on-duty pump capacity of Wong Chuk Wan SPS is 64L/s. Revelent sections and Appendix A is updated with the advised 64L/s flow.
	5. It is noted that parts of the sewerage system along Tai Mong Tsai Road are under surcharge condition. In this connection, you are advised to seek Drainage Services Department's agreement on the freeboard calculation and the technical feasibility of such connection.	Noted and the proposed scheme was circulated to DSD for their comment and advice.
3.	Environmental Protection Department, Water Quality Management Division, Water Quality Management Group, Specific Waste Management and Land Contamination Assessment, dated 4 June 2025	
	Waste Management	

No.	Comments	Responses
	1. Table 5.5: Please correct the following figures for accuracy. The percentage of inert C&D materials reuse rate should be 5% instead of 0.05%, and the percentage for delivery offsite to PFRF should be 95% instead of 99.5%.	Noted and revised. Please refer to Appendix D for the replacement page of the revised Environmental Assessment.
4.	Highways Department, Major Works Project Management Office, Major Works Office (2), dated 13 June 2025	
	1. Based on the R-to-C, we were given to understand that the applicants have withdrawn their proposal for "deferred possession" of the overlapping area between the Application Site and the Hiram's Highway Improvement Stage 2 (HH2) works boundary, and confirming that the proposed development will only fall within the Development Site boundary. We have no comments from HH2 project perspective please.	Noted with thanks.
5.	Planning Department, District Planning Branch, New Territories District Planning Division, Sai Kung & Islands District Planning Office, dated 13 June 2025	
	1. It is noted that the Application Site has taken into account the "leftover" area along the future extent of the realigned Tai Mong Tsai Road for better land management. Please further elaborate the intended uses of the "leftover" area.	It is noted that the Hiram's Highway Stage 2 (HH2) project is currently under the detailed design stage, and the road alignment of Tai Mong Tsai Road and associated structures may be subject to change. Should there be any remaining land between the future Tai Mong Tsai Road and the Development Site with no long-term designated use upon its completion, and in the case that the remaining strip of land is not under the purview of any Government departments, the Applicants are willing to take up the said area to avoid the strip of land being "leftover" from the land management perspective.
		Subject to further liaison and coordination with relevant Government departments, the "leftover" area could be proposed with buffer planting for better interfacing with the future realigned Tai Mong Tsai Road. Part of the "leftover" area at the western portion could also be paved and formed as the

No.	Comments	Responses
		extension of the 6m-wide public pedestrian walkway that is already committed by the Applicants, providing seamless connection from the future public footpath along Tai Mong Tsai Road, via the Development Site and the "Comprehensive Development Area (1)" site, to Mei Fuk Street.
6.	Lands Department, Lands Administration Office, District Lands Office, Sai Kung, dated 20 June 2025	
	1. The applicants are required to advise whether the pink cross-hatched blue area ("PCHBA"), being part of the Adjoining Site under the EXC Proposal, will be included in the proposed regrant lot of their future land exchange application for the subject proposed development. If affirmative, the triangular portion of land shown edged green on Appendix III of the previous comments from this office (please refer to the Attachment) being part of the PCHBA should be included in the Application Site.	Please be advised that the pink cross-hatched blue area will be included in the proposed regrant lot of the future land exchange application for the subject proposed development. The triangular portion of land shown edged green on Appendix III being part of the PCHBA shall also be included during the Land Boundary Survey in later stage. Whilst being in the Application Site (subject to setting out of the site), it is not intended to include it in the development site area and hence gross floor area in this application remains unchanged.
	2. Regarding the access to the existing shrine, the applicants should note that, prior to the completion of the PPW (i.e. the PCHBA together with the 6m-wide public pedestrian walkway along the southern boundary of the Adjoining Site), the part of existing footpath within the Application Site (which leads to the existing shrine by the Adjoining Site) should be kept open for public passage at all times and should be managed and maintained by future grantee of the land exchange application at the Application Site.	Noted, the existing footpath connecting to the existing shrine within the Application Site will be kept open for public passage at all times prior to the completion of the PPW and to be managed and maintained by future grantee of the land exchange application at the Application Site.
7.	Transport Department, NT Regional Office, Traffic Engineering (NTE) Division, Housing & Planning Section, dated 20 June 2025	
	Comments from Traffic Engineering Division 1. Re. Drawing No. 2.3, the proposed pedestrian crossing is not located at the future footpath under the Hiram's Highway Improvement Stage 2 project. Please review and clarify.	A pedestrian crossing with a refuge island is proposed due to wide vehicular access. Considering the size of the refuge island, the proposed crossing would be located outside

No.	Comments	Responses
		the future 2m wide footpath under HH2 project.
		The proposed pedestrian crossing is intended for public use to facilitate pedestrian crossing the development access at Tai Mong Tsai Road. While the proposed pedestrian crossing is within the Application Site, the crossing could be carved out and surrendered to the Government under the future Land Grant. Actual arrangement would be liaised with relevant departments under the future Land Grant formulation stage. Please refer to Appendix E for the plan indicating the arrangement of the pedestrian crossing area.
		The Applicant will undertake the design and construction of vehicular access and associated pedestrian crossing at his own cost. After completion of the construction, the facilities will be handed over to the Government subject to further liaison with relevant departments under the future Land Grant formulation stage.
	2. Re. Appendix C, 78 parking spaces were indicated, which is inconsistent with Table 2.2 in the TIA Report. Please review.	The indicative parking layout has been revised to 75 car parking spaces, same number as Table 2.2 in the TIA report. The detailed design of the parking layout will be submitted to TD under subsequent detailed design stage. Please refer to Appendix F for the revised indicative parking layout.
	3. Please also include the survey result in May 2025 in the TIA report.	Noted and included in Section 3 of the revised Transport Impact Assessment (TIA) report. Please refer to Appendix G for the replacement pages of the revised TIA.
	Comments from Transport Operations Division 4. Re. Tables 6.1 and 6.5, please revise the destination of GMB Route No. 1A as "Diamond Hill (Choi Hung Road) Public Transport Interchange".	Noted and revised accordingly.

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8.	Drainage Services Department, Operations & Maintenance Branch, Mainland South Division, Mainland South 6 (Tseung Kwan O, Sai Kung and Yau Tong), dated 30 June 2025	
	After further reviews on the Further Information (2) provided by the applicants, please be advised that we have no further comment on the revised DIA and SIA submission for the captioned development.	Noted with thanks.

(Last updated 25 July 2025)