Appendix A –
Responses-to-Comments Table
(Departmental Comments)

Section 16 Planning Application for Proposed Amendments to an Approved Comprehensive Residential Development Scheme and Minor Relaxation of Gross Floor Area and Building Height Restrictions at Various Lots in D.D. 385 and Adjoining Government Land, Tai Lam Chung, Tuen Mun (Application No. A/TM-SKW/134)

Responses to Departmental Comments

Responses to Departmental Comments

	Departmental Comments	Responses to Comments
1.	**Comments of Civil Aviation Department**	
	<u>Airport Height Restriction (AHR) and Lighting</u>	
1.1	On the understanding that the proposed minor relaxation would permit maximum building height of six residential towers up to +84mPD (excluding rooftop structures), which will not exceed the AHR as prescribed under the Hong Kong Airport (Control of Obstructions) Ordinance (Cap.301), we have no comment on the proposal from the perspective of safeguarding the operations of the Hong Kong International Airport (HKIA). Given the close proximity to some of the main flight paths of the HKIA, please observe that all lights, including those installed for construction works, or for maintenance after the construction works, shall not be projected skyward and form a source of glare or in any way affect pilots in flight at all times.	Noted. All lights, including those installed for construction works, or for maintenance after the construction works, would not be projected skyward and form a source of glare or in any way affecting pilots in flight at all time. **Section 1.5.13** of the revised Environmental Assessment under **Attachment 1** has been supplemented accordingly.
	<u>Aircraft / Helicopter Noise</u>	
1.2	Despite that the application site is situated outside the NEF25 contour of HKIA, the site is located under or in close proximity to some of the main flight paths of the HKIA where there will be high volume of flight operations. As a result, it is expected that future occupants of the proposed site will be subject to significant aircraft noise disturbances. This issue is especially pronounced during the night-time period when ambient background noise levels are low, leading to more severe impacts from aircraft noise. In fact, we are aware of the high number of aircraft noise complaints lodged by the residents in Tai Lam Chung from time to time.	Noted.

	Departmental Comments	Responses to Comments
1.3	It is noted the Environmental Assessment report provided does not include any evaluation related to the impact of aircraft noise. The applicant is thus strongly suggested to reflect the above aircraft noise issues in the report and provide recommendations on the implementation of appropriate noise mitigation measures (e.g. use of acoustic insulation, etc.) to ensure aircraft noise impact on future occupants is minimized. Also, we strongly suggest that perspective buyers or future residents should be duly alerted of the aircraft operations associated with HKIA to ensure they are aware of the potential noise impact well in advance.	According to the approved EIA report for Expansion of Hong Kong International Airport into a Three-Runway System (Ref.: AEIAR-185/2014), the Application Site is completely outside the NEF25 contour as required under the Hong Kong Planning Standards and Guidelines (HKPSG). No unacceptable aircraft noise impact within the Application Site is identified. Better insulation would be considered for the Proposed Development (e.g. 8mm glass or better instead of nominal glass pane of 6mm thickness) at detailed design stage subject to further review and study. In future, all noise mitigation measures as proposed in the Noise Impact Assessment Report shall be clearly indicated in the sales brochure to ensure that perspective buyers or future residents will be well informed of any potential noise impact. **Sections 1.5.11, 1.5.12 and Appendix 8.5** of the revised Environmental Assessment under **Attachment 1** have been supplemented accordingly.
2.	**Comments of Environmental Protection Department**	
	<u>Environmental Assessment (EA)</u> <u>Comments received on 14.11.2025</u> *<u>Air Quality</u>*	
2.1	**Section 4.4.3** – Please revise “5m buffer distance” in 3rd last line to “buffer distance of >5 m”.	Noted. **Section 4.4.3** of the EA under **Attachment 1** has been revised accordingly.
2.2	**Section 4.4.4** – • Please specify the road link number(s) for the “Proposed Access Road” in Line 1, “some portions” in Lines 2–3, and “the non-EVA portions” in Line 6. • Please revise Lines 5–6 to “…, it is classified as “Local Distributor”, as agreed by TD, and a buffer distance of >5 m is recommended for the non-EVA portions…”	• Noted. The road links have been supplemented in **Section 4.4.4** of the revised EA under **Attachment 1**. • Noted. **Section 4.4.4** of the revised EA under **Attachment 1** has been revised accordingly.

	Departmental Comments	Responses to Comments
	• Please revise "5m buffer distance" and "10 m buffer distance" in the second-to-last line to "buffer distance of >5 m" and "buffer distance of >10 m".	• Noted. **Section 4.4.4** of the revised EA under **Attachment 1** has been revised accordingly.
2.3	**Section 4.6.3** – It is noted that the detailed information of the proposed STPs is not available yet, therefore the proponent has committed to submit an odour impact assessment during detailed design stage once the design of the two STPs is available to identify the removal efficiency required for the two STPs. For completeness, please be advised to evaluate the odour impact of the STPs in the EA report.	**Section 4.6.7** of the revised EA under **Attachment 1** has been revised as follows: "With adequate odour removal system and regular maintenance, the odour impact due to the operation of the STPs minimised. However, to be conservative, odour impact assessment will be conducted during the detailed design stage." The above commitment regarding the preparation of a quantitative odour impact assessment at the detailed design stage is consistent with other agreed/approved planning applications which provided no detailed information on the STP, such as Application No. Y/TW/18 at Yau Kam Tau (partially agreed on 19.9.2025) and Application No. A/DPA/SK-CWBN/12 at Clear Water Bay (approved on 19.11.2004): • For Application No. Y/TW/18, the relevant wording in the EA report is attached under **Annex C** for easy reference; • For Application No. A/DPA/SK-CWBN/12, the wording of approval condition (c) regarding quantitative odour impact assessment is as follows: "the submission and implementation of environmental mitigation proposals (including traffic noise and odour impact assessments) within the site to the satisfaction of the Director of Environmental Protection or of the Town Planning Board". To further supplement on the design of the STPs: • As discussed in **Section 4.6** of the revised EA under **Attachment 1**, the STPs with design capacity of 881m^3/day and 1,408m^3/day are fully enclosed and located underneath Towers 1 and 5. Their locations have been indicated in **Appendix 4.2** of the revised EA. Their design will refer to EPD's "Guidelines for the Design of Small Sewage Treatment

	Departmental Comments	Responses to Comments
		Plants", with exhaust facing away from air sensitive uses to ensure not causing odour impact to the occupants/residents of the air sensitive uses including the surrounding developments and the Application Site. The potential locations of the exhausts of the proposed STPs and its distance to air sensitive receivers are shown in **Figures 4.3a and 4.3b** of the revised EA. To minimize the potential odour nuisance, the mechanical ventilation system of the STPs will be connected to an odour removal system which shall achieve removal efficiency of 99.5%. With the adoption of odour removal system, it is anticipated that the surroundings air sensitive receivers will not be subject to unacceptable odour impact from the operation of the proposed STPs. Apart from adoption of odour removal system, regular maintenance, for example regular sludge removal to prevent accumulation of odourous gas, would be carried out to ensure the odour removal efficient is maintained at/above the design requirement. Sludge tankers will be used to transport the sludge, which is expected to be transported to T Park by registered desludging companies. The tanker will park at the basement carpark near the STPs and sludge will be pumped by coupling. The odourous gas will be confined within the STP which will be kept under negative pressure. The gas will be drawn to a de-odouring system for treatment before releasing into the atmosphere. As the transfer process will be carried out in enclosed environment and in low frequency (one time per day), no odour impact is expected on ASRs during handling of sludge; • In terms of sewage effluent, as discussed in **Section 5.7** of the revised EA under **Attachment 1**, membrane bioreactor (MBR), which achieves tertiary wastewater treatment level, will be adopted for the Proposed Development to meet North Western Water Control Zone effluent discharge standards. The treated effluent will be discharged to Tai Lam Chung Nullah through the proposed box culvert. It is expected that the operation of the STPs would not cause water quality

	Departmental Comments	Responses to Comments
		impact. More than 2 hours of emergency storage in accordance with Guidelines for the Design of Small Sewage Treatment Plants will be adopted. Other possible emergency measures such as dual power supply or generator set shall be confirmed in future detailed design stage. • Please note that the design, exact location and other information provided are subject to further review at detailed design stage with agreement to be sought with relevant government departments through discharge of relevant approval condition subsequent to the approval of the subject planning application. It should be noted that, under the Approved Scheme (Application No. A/TM-SKW/32), a STP was also proposed at the same location as the current southern STP, with the treated effluent also being discharged into the Tai Lam Chung Nullah. For reference, please refer to the MLP of Approved Application No. A/TM-SKW/32 as submitted under Attachment 2 of the Planning Statement on 16.5.2025.
2.4	*Hazard* **Section 7.1.2 & 7.1.3** – It is noted that a part of northern portion of the Development Site falls within the 1km Consultation Zone of Tai Lam Chung No.2 Chlorination Station (TLCCS). Please explain only in accordance to Section 7.1.3, which TLCCS will be delisted from the PHI register soon with no more chlorine storage as confirmed by WSD, so that no quantitative risk assessment is required. Based on the aforesaid reason, we also have no comment from chlorine risk perspective.	Noted. The previous **Section 7.1.2** has been removed. **Section 9.1.13** has also been revised accordingly. Please refer to the revised EA under **Attachment 1**.

	Departmental Comments	Responses to Comments
	Land Contamination	
2.5	**Table 8.1** –	
	• Please clarify whether the "Development Site Description" includes the "Application Site Boundary" as indicated in the aerial photos. Also, please clarify whether "Off-site Land Use" exclude the "Application Site Boundary". If so, please state clearly in the relevant section. If not, please add a column for the application site boundary and review the land uses changes.	• Please be clarified that the "Development Site Description" excludes areas that fall within the Application Site Boundary but lie outside the Development Site Boundary; whereas the descriptions for "Off-site Land Use" cover areas that lie outside the Development Site Boundary (including the areas that fall within the Application Site Boundary but outside the Development Site Boundary). Remarks have been supplemented under **Table 8.1** of the revised EA under **Attachment 1**.
	• For the off-site land use in 1979 and 1985, please clarify what the observed temporary structures are.	• The structures observed in 1979 were the Hong Kong Customs College whereas those observed in 1985 were storing containers.
	• For the development site in 2010, it is apparent that most areas were converted to car parking. Please review this observation.	• Noted. "Car parking" has been supplemented under the Development Site Description in 2010. Please refer to **Table 8.1** of the revised EA under **Attachment 1**.
	• For the development site in 2015, more roofed structures were observed on the northern side. Please clarify whether the structures are warehouse, vehicle workshops, or other land uses, and any land contamination potential were involved.	• Noted. The roofed structures observed on the northern side in 2015 are deduced to be temporary storage. **Table 8.1** of the revised EA under **Attachment 1** has been supplemented accordingly.
	• For the development site in 2024, it is clear that the middle part of the site was changed to car a parking area. Please review.	• Noted. "Car parking" has been supplemented under the Development Site Description in 2024. Please refer to **Table 8.1** of the revised EA under **Attachment 1**.
2.6	**Section 8.3.2** – The last sentence seems inappropriate, as site inspection may not reveal historical contamination. Please revise the sentence. Alternatively, the consultant may wish to provide additional supporting information from desktop research to substantiate that the land contamination potential is not anticipated for the storage containers.	Noted. As there is no record of chemical spillage/ leakage and no dangerous goods licence was issued, it can be deduced that no chemicals are stored in the storing containers and hence land contamination potential is not anticipated for the storage containers. **Sections 8.3.2 and 8.5.3** of the revised EA under **Attachment 1** have been revised and supplemented accordingly.

	Departmental Comments	Responses to Comments
2.7	**Section 8.5.3** – Please provide further information to support the claims that the fire incident was small scale and did not involve any chemicals. <u>Comments received on 17.11.2025</u>	Noted. **Section 8.5.4** (previously Section 8.5.3) of the revised EA under **Attachment 1** has been supplemented accordingly.
2.8	**S.2.3.4** – TD's endorsement for the traffic flow data is still pending. Please supplement.	Noted. TD's endorsement will be provided when available.
2.9	**S.3.3** – Please consider the Tai Lam Chung Vehicle Examination Centre as a fixed noise source.	Noted. **Table 3.2** of the revised EA under **Attachment 1** has been supplemented to include Tai Lam Chung Vehicle Examination Centre.
2.10	**Table 3.2** – For the replies from the Government Departments, they should be as shown in "Appendix 3.1" instead of "Appendix 3.2". Please revise.	Noted. **Table 3.2** of the revised EA under **Attachment 1** has been revised accordingly.
2.11	**S.3.3.3** – Please revise the "(including 4.2.14)" into "Section 4.2.14 of Chapter 9".	Noted. **Section 3.3.3** of the revised EA under **Attachment 1** has been revised accordingly.
2.12	**Table of Base Case-T7 in Appendix 2.2** – The cell for "No. of Units with Exceedance" displays "#REF!". Please update.	Noted. **Appendix 2.2** of the revised EA under **Attachment 1** has been revised accordingly.
2.13	**Noise model –** • The flow rate and percentage of heavy vehicles of L4 in the model are not tally with the traffic forecast in Appendix 2.1. Please review and update. • Road L15, L16 and L17 are missing in the model. Please update. • The height of certain buildings (e.g. no. 66-77 Wu Uk Tsuen etc.) are incorrectly set to 0m. Please review and update.	• Noted. The updated noise model has already been submitted to EPD separately for review. • Noted. The updated noise model has already been submitted to EPD separately for review. • Noted. The updated noise model has already been submitted to EPD separately for review.

	Departmental Comments	Responses to Comments
	Sewerage Impact Assessment (SIA)	
2.14	Section 6.2.1 – as the development did not include the construction and installation of sewerage systems of the village houses. Please revise as "~~Septic tank system is suggested as sewerage mitigation for the village housing sites.~~ The detail of the **sewerage mitigation** arrangements shall be designed by the owners of the village housing **sites according to relevant guidelines including ProPECC PN 1/23**.	Noted. **Section 6.2.1** of the SIA under **Attachment 2** has been revised accordingly.
3.	**Comments of Planning Department – Tuen Mun and Yuen Long West District Planning Office**	
	Comments received on 4.9.2025	
3.1	The circulation plan with the circulation diagram of the LMP (drawing No. 2021213-NS-16-CDP-01a) as base layer seems to contain too much information in one single plan. Instead, please consider to convey (1) information relating to the colored areas; and (2) information relating the different types of access in two separate plans. For plan (1), you may touch up on Figure 2.7 – Overlay Plan of Application Site Boundary and Draft Land Grant Plan of the SPS and to include information relating to the access arrangement of the colored areas under the lease requirements (eg. pink hatched black hatched red open for public use freely; green stippled red area, which will be reprovided for villagers' use etc.) As for plan (2), you may wish to illustrate the access for various patronage groups including the general public / residents only / villagers (only) and their respective access restrictions (i.e. opening hour restrictions / whether they are gated (if yes, indicate the gates on the plan) etc.)	Please refer to **Figure A1** under **Annex A** of this RtoC Table, which illustrate the areas to be open for public access and their corresponding details. With regards to the concern on "the access for various patronage groups" and "opening hour restrictions / whether they are gated", please be clarified that the relevant areas as shown in **Figure A1** are required to allow free access for all members of the public at all time free of charge, hence there are no access restricted to specific patronage groups only; and there are also no opening hour restrictions or being gated (except for the Public Open Space and Public Car Park, which the opening hours will be determined in accordance with the respective management plans to be submitted under lease and to be approved by relevant Government departments).

<table>
<tr><th></th><th>Departmental Comments</th><th>Responses to Comments</th></tr>
<tr><td></td><td><u>Comments received on 30.9.2025</u>

<u>Application Site Boundary and Completion Year</u></td><td></td></tr>
<tr><td>3.2</td><td>Figure 1.2 of the Planning Statement refers. The application site covers only majority of the “CDA” zone, please clarify why the entire “CDA” zone is not covered?</td><td>The current Application Site boundary was formulated mainly based on the draft land grant plan prepared in relation to the land exchange application submitted to LandsD, under which detailed setting-out has been conducted. Although the Application Site Boundary only covers majority of the “CDA” zone, it offers a more accurate reflection of the actual land processing arrangement.</td></tr>
<tr><td>3.3</td><td>The tentative completion year for the proposed development is 2030. Please provide information regarding the preliminary implementation time frame and phasing of the proposed development.</td><td>The preliminary implementation programme is as follows:

<table><tr><th>Timeline</th><th>Key Milestones</th></tr><tr><td>Year 2025</td><td>Approval of S16 Planning Application</td></tr><tr><td>Year 2026-27</td><td>Processing of Lands Procedures / Lease Modification</td></tr><tr><td>Year 2028-30</td><td>Construction Works</td></tr><tr><td>Year 2030 Onwards</td><td>First Population Intake</td></tr></table>
Please note that the implementation programme is indicative only and will be subject to changes as the project progresses.</td></tr>
<tr><td></td><td><u>Traffic Impact Assessment</u></td><td></td></tr>
<tr><td>3.4</td><td>It is noted that the improvement works for Castle Peak Road – Castle Peak Bay was substantially completed in 2024 Q2. Please clarify if the assessment has taken into account such improvement works.</td><td>Please be clarified that the relevant improvement works have already been taken into account in the TIA.</td></tr>
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<tr><th></th><th>Departmental Comments</th><th>Responses to Comments</th></tr>
<tr><td>3.5</td><td>Please provide a breakdown of the car parking spaces to be provided in the basement carpark and on the open-air ground floor carpark respectively. For above-ground carpark, please advise if they are taken into account in GFA calculation.</td><td>Please be clarified that all above-ground carpark are open carpark and would not be GFA-accountable. The indicative breakdown of car parking spaces to be provided above-ground and at basement are as follows:
<table><tr><td></td><td>Above-ground</td><td>Basement</td><td>Total</td></tr><tr><td>Residential Parking Spaces (including Visitor Parking Spaces)</td><td>71</td><td>410</td><td>481</td></tr><tr><td>Motorcycle Parking Spaces</td><td>21</td><td>6</td><td>27</td></tr></table>Please note that the above breakdown is indicative only. The detailed carparking provision will be determined at detailed design stage, which will be subject to approval by relevant Government department(s).</td></tr>
<tr><td>3.6</td><td>Please provide a plan showing the existing junction design of J5 (as of today without the improvement measures proposed under the previously approved application and the future junction design upon the further improvement as recommended in the current proposal.</td><td>The existing junction layout of J5 is shown in Figure 3.6 of the submitted TIA.</td></tr>
<tr><td></td><td><u>Site Formation and Excavation</u></td><td></td></tr>
<tr><td>3.7</td><td>Please clarify if site formation will be carried out at the Application Site. If so, please provide relevant details (i.e. extent and depth etc.) and provide a plan showing the area of the site formation.</td><td>The Applicant is responsible for the formation of the Village Housing Sites as shown on Figure 3.1 of the Planning Statement. Details of site formation will be determined at detailed design stage, which will be subject to approval by relevant Government department(s).</td></tr>
<tr><td>3.8</td><td>Please clarify if excavation will be carried out at the Application Site for the Proposed Development. If so, please provide relevant details (i.e. extent, depth, anticipated volume of excavated land and the proposed treatment etc.) and provide a plan showing the area of the excavation.</td><td>The tentative excavation area is indicated as the basement extent on the B/F Plan (Figure 3.2 of the Planning Statement refers). Details of excavation will be determined at detailed design stage, which will be subject to approval by relevant Government department(s).</td></tr>
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	Departmental Comments	Responses to Comments
	Ecological Value of Nearby Waterbodies	
3.9	It is noted that there are waterbodies (i.e. Tai Lam Chung Nullah, Tai Lam Chung Tributary and a channel within the Application Site) near and within the Application Site, please clarify if these waterbodies have any ecological value and mitigation measures to be undertaken to ensure they are not affected by the proposed development.	According to the Agriculture, Fisheries and Conservation Department's (AFCD) website, AFCD identified some natural streams and rivers as Ecologically Important Streams/Rivers (EIS), which are natural streams and rivers with important ecological functions such as providing habitats for diverse or rare animal or plant communities. In this connection, please be clarified that the three waterbodies (i.e. Tai Lam Chung Nullah, Tai Lam Chung "Tributary" and a channel within the Application Site) are **all man-made channels** and are **not listed as one of the 33 EIS** identified by AFCD in Hong Kong. In addition, according to our observation, Tai Lam Chung Nullah is an engineered trapezoidal concrete channel maintained by the Drainage Services Department. The DIA confirmed the nullah is a separate drainage system, and the proposed development would not have impact to the nullah. Meanwhile, Tai Lam Chung Tributary is an engineered channel with concrete base intended for drainage purpose only. The drainage channel within Site is also a concrete open channel purely for drainage purpose and will be replaced by the proposed underground box culvert in the Proposed Development.
	Building Separation	
3.10	According to RtoC Item 14.10, UD&L noted there is a reduction in widths of the building separation/setback between the current proposal and the Approved Development. Please indicate such changes on a plan.	The building separation/setback of the Approved Scheme and Proposed Scheme are shown in **Figures 2 and 3** of the submitted AVA-EE. As shown in the figures, the 25m building separation in the NW-SW direction in the Approved Scheme is reduced to 15m in the Proposed Scheme, while the 15m podium setback from the southwest site boundary is reduced to 5m. Nevertheless, two additional building separations have been incorporated into the Proposed Scheme, including a 25m separation (for Wong Uk Tsuen) in E-W direction and a 15m separation in the N-S direction. With the proposed design measures in place, the AVA-EE concluded that the Proposed Scheme would not have significant air

	Departmental Comments	Responses to Comments
		ventilation impacts on the pedestrian wind environment compared to the Baseline Scheme.
	<u>Drainage Mitigation Measures</u>	
3.11	Figure 7 of DIA refers. Please simplify this plan to clearly show the different types of drainage facilities to be provided (i.e. peripheral drains, detention tank, etc.) and their construction and maintenance & management parties.	Noted. For illustration purpose, a simplified illustrative diagram of the proposed drainage arrangement is provided at **Annex B** of this responses-to-comments table. To tally with its presentation as well as the location and extent of drainage facilities, **Figure 7** of the Drainage Impact Assessment has also been updated accordingly (**Attachment 3** refers).
	<u>Waste Management</u>	
3.12	It was mentioned that temporary RCP and public toilet will be provided. Please indicate on a plan the locations of such facilities and advise the party who will construct, manage and maintain such temporary facilities.	Please be clarified that the Applicant will be responsible for the construction and maintenance of the temporary RCP and public toilet, which the location and design shall be approved by the FEHD in accordance with relevant lease condition(s) in subsequent stage(s). The Applicant shall also allow free access to FEHD for daily management and operation of the temporary RCP and public toilet.
	<u>Site Coverage</u>	
3.13	Please clarify the meanings of “above ground” as mentioned in the R to C. Does it refers to 15m above or 15m below as stipulated in Building (Planning) Regulations (B(P)R)?	For clarity purpose, instead of referring to “Maximum Domestic Site Coverage (above ground)” in the development schedule, the figures for site coverage have been supplemented explicitly in the development schedule as follows: • About 22% (beyond 15m above ground level) • About 47% (up to 15m above ground level) Please note that these site coverage figures provided are indicative and for reference only and subject to detailed design. The development schedule has been updated accordingly. Please refer to the replacement page of the Planning Statement in **Attachment 4**.

	Departmental Comments	Responses to Comments
3.14	As mentioned in the RtoC, the rationale for having a site coverage that is significantly lower than the permissible site coverage under B(P)R (i.e. 22% for above 15m, as compared to 33%; and 47% for below 15m, as compared to 100%) is to allow room and to achieve for design merit including the provision of not less than 7,476m^2 of private open space (POS). In this regard, please confirm if the POS and the 30% green coverage are going to be at grade.	While the proposed SC of about 22% (beyond 15m above ground level) and about 47% (up to 15m above ground level) have not yet reached the maximum permissible limits of 33.33% and 100%, it is important to note that a lower SC was proposed so as to allow for the incorporation of various planning and design merits, including provision of additional building separations, and maximizing at-grade private open space as well as greenery provision as far as practicable. To further supplement the above: (i) In terms of building separation, it should be noted that two additional building separations of 15m to 25m have been incorporated into the Proposed Scheme as compared to the Approved Scheme. The relatively lower SC under the Proposed Scheme is essential for the incorporation of these additional building separations for breaking down the building mass, enhancing visual permeability and serving as wind corridors and breezeways to facilitate air ventilation; (ii) In terms of provision of private open space, please be advised that the private open space will be provided at grade as far as practicable and/or in locations where they are easily accessible by future residents (i.e. at level not more than 15m measured from the mean level of the abutting streets). To facilitate this, the Applicant has strived to minimise the building footprint of residential towers to accommodate private open space at lower levels wherever practicable; (iii) In terms of greenery provision, please be advised that the greenery coverage (including green roofs) will strictly follow the requirements on Site Coverage of Greenery according to Sustainable Building Design Guidelines, among which not less than 50% of greenery to be located within the Primary Zone. To facilitate this, the Applicant has strived to minimise the building footprint of residential towers to accommodate greenery provision at lower levels wherever practicable.

	Departmental Comments	Responses to Comments
		On this basis, the Applicant considers that the current proposal has achieved a reasonable and appropriate balance between utilising SC to manage the increase in BH and minimising SC to accommodate key planning and design merits (including building separations and provision of private open space and greenery at lower levels). Any further increase in SC in exchange for a lower BH would compromise these merits and is considered undesirable from a planning and design perspective. Please be reiterated that the site coverage figures provided, the landscape design and location of private open space are indicative only which will be subject to detailed design.
	<u>Shrine</u>	
3.15	According to our on-site observation, there are two existing shrines within the Application Site. Please clarify if both are to be in-situ preserved. If not, please advise the arrangement.	Please be clarified that the two existing shrines (Pak Kung and Dai Wong Yeh) will be preserved in-situ.
	<u>Aircraft Noise</u>	
3.16	It is noted that Application Site falls within the major aircraft flight path. Please advise the noise mitigation measures to alleviate the potential aircraft noise.	Please refer to **Item 1.3** of this responses-to-comments table.
	<u>Comments received on 10.12.2025</u>	
3.17	Please provide an illustrative diagram showing trees to be felled, trees to be retained, trees to be transplanted and proposed new trees.	Noted. Please refer to **Figure D1** under **Annex D** of this responses-to-comments table. Please note that this diagram is for illustrative purpose only. For details, please refer to the submitted Landscape Design and Tree Preservation Proposal.

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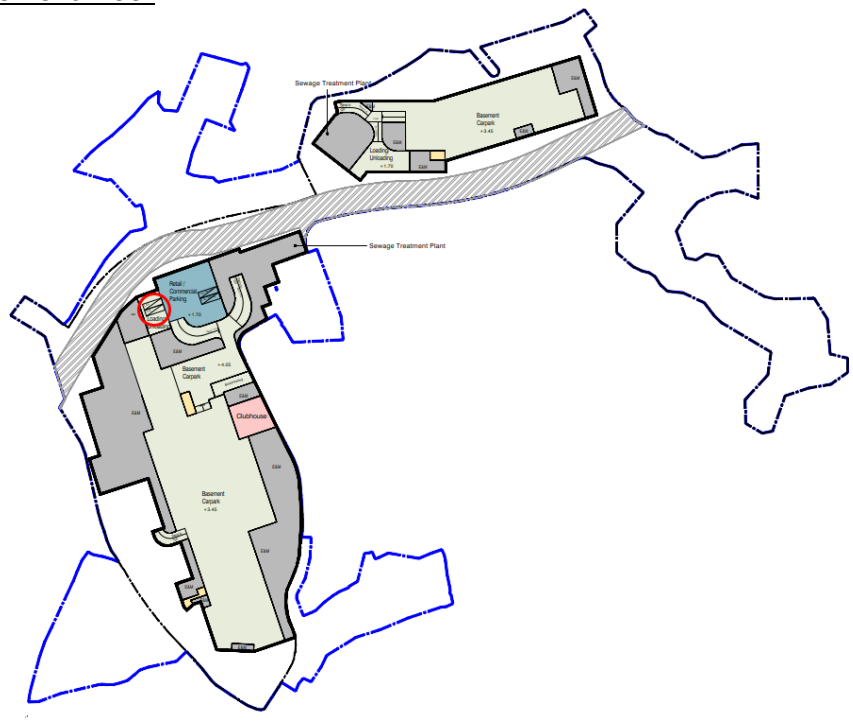
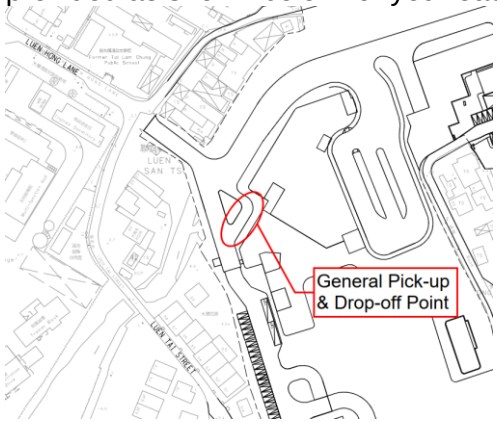
4.	**Comments of Transport Department**	
	<u>Traffic Engineering Perspective – Comments on 30.9.2025</u>	
4.1	From the swept path analysis SK10 and SK12, it seems that PC may not be able to enter Luen Tai Street from Luen Hong Lane when another vehicles is waiting at the give way lines on Luen Tai Street. Please review the junction and road marking layout.	The junction layout of Luen Hong Lane/Luen Tai Street has been further reviewed and revised. Please find the updated swept path analysis in the revised TIA under **Attachment 5**.
4.2	Table 2.2 – Only 6 L/UL Spaces are identified in Figure 2.1 which is inconsistent to the responses.	Please be advised that 6 nos. of L/UL bays are provided above-ground while 2 nos. of L/UL bays are located at basement. The location of 2 nos. of L/UL bays are indicated below for your reference. <u>Basement Floor</u> 

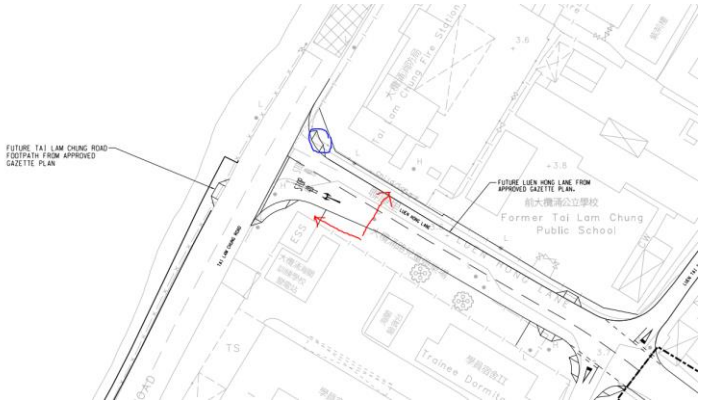
	Departmental Comments	Responses to Comments
4.3	Chapter 3 – The section of Tuen Mun Road (Tuen Mun Bound) L2 included in the AOI should be defined as the section of Tuen Mun Road at the west of the slip road connecting Castle Peak Road – Tai Lam to Tuen Mun Road (Tuen Mun Bound) to reflect the traffic impact brought by the development to the Tuen Mun Road (Tuen Mun Bound).	Noted. The additional road link assessments have been included in the revised TIA under **Attachment 5**.
4.4	Chapter 3 – The slip road of Siu Lam Interchange to Tuen Mun Road (Kowloon Bound) is missing.	Noted. The associated road link assessments have been included in the revised TIA under **Attachment 5**.
4.5	Table 5.5 – The number of flat in TMTL 463 is 800.	Noted. **Tables 5.5 and 5.6** of the revised TIA under **Attachment 5** have been updated accordingly.
4.6	In Figure 5.4, only around 13% of development (33 pcu out of 258 pcu) will travel to Kowloon direction of via Castle Peak Road – Tai Lam, which appears to be underestimated. Please justify the low percentage of directional split of development flow to Kowloon direction.	Please be advised that the directional split has made reference with the traffic pattern at the existing junctions as well as the BDTM model. Nevertheless, as per the revised TIA and RtoC separately submitted to TD for review on 9.10.2025, we have carried out a sensitivity assessment with 50% directional split to Kowloon direction, and the critical junctions (i.e. J2 and J5) will be operating in 0.57 / 24% and 0.19 / 44% during AM and PM peak respectively, which will still be operating with adequate capacity. For information, according to the latest sensitivity test carried out based on traffic model, all junctions will be operating within capacity. For details, please refer to **Chapter 7** of the revised TIA under **Attachment 5**.
4.7	Chapter 6 – Please advise if the road link capacity of 7560pcu/hr (appears to be overestimated) should be adjusted when BOL is in operation during AM Peak.	Please note that the BOL terminates prior to the slip road connecting to Tuen Mun Road at the Siu Lam Interchange. Given that the relevant section of Tuen Mun Road (L3) is a dual 4-lane carriageway, a road link capacity of 7,560 pcu/hr (i.e. 6,300 veh/hr x 1.2 pcu factor) has been adopted for assessment purpose.
4.8	Para. 6.1.2, Figure 6.1, 6.2 – In junction calculation of J5, the cycle time is still 120s and has not been updated yet. Please check and revise.	Noted. **Table 6.1** and relevant assessments of the revised TIA under **Attachment 5** have been updated accordingly.

	Departmental Comments	Responses to Comments
4.9	Figure 6.4 – Please provide a sensitivity test with flow ratio between FP1 and FP2 maintained at 1:4.	Noted. A sensitivity test has been conducted assuming a 1:4 flow ratio between FP1 and FP2. Please be advised that the pedestrian flow for FP1 is projected to be 250 pedestrians per hour during the AM peak and 275 pedestrians per hour during the PM peak, both operating at Level of Service (LOS) A. For FP2, the pedestrian flow is estimated at 1,010 pedestrians per hour in the AM peak and 1,100 pedestrians per hour in the PM peak, corresponding to LOS B. Based on these results, it is concluded that there will be no significant impact on FP1 and FP2.
4.10	Annex B – Calculation Sheets – Please highlight the update for our checking.	Noted. The changes have been highlighted in **Annex B** of the revised TIA under **Attachment 5**.
4.11	Figure 6.2 Junction Improvement (J5) – Please review the RM1104 in the yellow box marking and check if the road marking will be misinterpreted by the right turning vehicles from Castle Peak Road – Tai Lam (northbound).	The road marking arrangement has been further reviewed and revised accordingly. Please refer to **Figure 6.2** of the revised TIA under **Attachment 5**.
4.12	Figure 6.2 Junction Improvement (J5) – Please check the performance of J5 with cycle time of 90s.	Noted. **Table 6.1** and relevant assessments of the revised TIA under **Attachment 5** have been updated accordingly.
4.13	Please also check if the length of the flare lane on Castle Peak Road – Tai Lam (Southbound) could accommodate the peak traffic flow.	As presented in **Table 6.3** of the TIA, the queue length for Castle Peak Road – Tai Lam southbound will be 30m and 18m during AM and PM peak respectively. Given that the available flare length for queuing is 42m, it is deemed sufficient from a traffic engineering perspective.
4.14	The carriageway of Castle Peak Road – Tai Lam should be widened to accommodate traffic islands with the second primary signals and the secondary signals for the traffic at the outer approach lanes for both northbound and southbound traffic at the junction.	Please be advised that the carriageway of Castle Peak Road – Tai Lam is constrained by the existing slope along both the eastern and western footpath. Hence, widening of the current road width is not feasible. Nevertheless, min. 50m sightline of the secondary traffic signals can be achieved for both northbound and southbound at the junction, which complies with the TPDM's requirement.

	Departmental Comments	Responses to Comments
4.15	Annex A – Footpath along Tai Lam Chung Road – Please include the design of footpath in the TIA.	Noted. The future footpath as per the Gazette Plan has been indicated in **Figure 2.2** of the revised TIA under **Attachment 5** accordingly.
	<u>Transport Operation Perspective – Comments on 30.9.2025</u>	
	<u>Section 3.5, Table 3.4, R-to-C item 16.32</u>	
4.16	As mentioned in the previous comment, the 500m radius of proposed development should not cover Tuen Mun Road Bus-Bus Interchange (Tuen Mun bound), therefore all Tuen Mun bound service details should not be included in Table 3.4. Please revise Table 3.4 accordingly.	Noted. **Table 3.4** of the revised TIA under **Attachment 5** has been revised accordingly.
	<u>Section 4.2, Figure 4.1, R-to-C items 16.35-16.40</u>	
4.17	According to section 4.2.1, it is proposed to introduce additional franchised bus services travelling in between the Proposed Development and Tuen Mun Road Bus-Bus Interchange ("TMRBBI") to facilitate the future public transport demand. If this is so, please review the proposed allocation of 3 bus lay-bys and 4 GMB lay-bys under section 4.2.3 against the proposed PT services. For efficient use of the PTI (even though it would be private-operated one), the consultant should critically review the layout/ proposed provision in the detail design stage. In addition, the consultant should review and study the availability of space at TMRBBI to accommodate the proposed trips.	Please be advised that the proposed provision of 3 bus lay-bys and 4 GMB lay-bys have already enable feasibility on the planning of public transport services. The detailed arrangement of the proposed enhancement on public transport services would be subject to further review and consideration by the relevant Government departments and/or stakeholders at detailed design stage.
4.18	The provision of proposed public transport interchange shall be supplemented with assessment and planning of public transport services, projected passenger demand, utilization surveys, etc.	Noted. The relevant planning and assessments will be reviewed at detailed design stage.
4.19	To ensure smooth operation of public transport services and free from any obstruction, the PTI shall not share with the other vehicles and be exclusive to the public transports only.	To optimize the use of the site area, it is proposed that the space be shared between public transport services with a general lay-by. Furthermore, appropriate management measures will be considered during the detailed design stage to ensure the smooth operation of public transport services.

	Departmental Comments	Responses to Comments
4.20	According to TPDM, a linear bay provides 1 boarding/alighting space and 2 stacking spaces, therefore the proposed provision is considered as 1 bus lay-by with 2 stacking spaces. Please update the design/layout of PTI if 3 bus lay-bys are to be provided.	Please be advised that a total of three bus laybys will be provided within the covered transport layby to ensure sufficient operational capacity.
4.21	Please advise if taxi stands will be provided at the site.	Please be advised that the general pick-up & drop-off point will be provided as shown below for your easy reference. 
4.22	Please advise if passenger shelters or canopies will be provided at the queueing area of buses and GMBs.	Please be advised that the proposed covered transport layby will be covered by a cantilevered structure.
4.23	Please advise if the staff ancillary facilities will be provided by the private developer upon construction.	Noted. The location of the staff ancillary facilities has been indicated in **Figure 4.1** of the revised TIA under **Attachment 5**. The provision of such facilities will be reviewed at detailed design stage.
4.24	EV charging enabling infrastructure are required in PTI to support the operation of terminating routes. Since e-charging policy is promulgated by EPD, their comments should be sought.	Noted. The relevant facilities will be reviewed in detailed design stage.
	<u>Annex C – SK7</u>	
4.25	Please advise the vehicle length of GMB used in the swept path analysis.	Please be advised that 8m vehicle length is adopted for the relevant swept path analysis. The vehicle length has also been indicated in the swept path diagram of the revised TIA under **Attachment 5** accordingly.

	Departmental Comments	Responses to Comments
	<u>Traffic Engineering Perspective – Comments on 24.10.2025</u>	
4.26	**Table 3.3** – Capacity of Link L1 - Tuen Mun Road (EB) at 7,560 pcu/hr is overestimated. Consultant's response in RtC table "the BOL terminates prior to the slip road connecting to Tuen Mun Road at the Sui Lam Interchange" is incorrect. There is BOL at Sui Lam Interchange of Tuen Mun Road (E/B) and hence nos. of remaining lanes for general traffic are over-estimated in assessment. Please rectify.	Noted. The relevant assessments have been revised accordingly. Please refer to the revised TIA under **Attachment 5**.
4.27	**Para. 5** – It is noted that growth factor method is adopted in the TIA for traffic forecast. However, as stated in our previous comment, traffic modeling should be used for assessing the traffic forecast in view of the increased development scale. If the consultant considered that the growth factor method may be more conservative, traffic modeling should still be conducted as sensitivity test to verify the above assumption is valid.	Noted. Please refer to the sensitivity test and its assessments in **Chapter 7** of the revised TIA under **Attachment 5**.
4.28	**Table 5.4** – Traffic growth at Tai Lam Chung Road and Castle Peak Road – Tai Lam substantially increase by 5 times and 2.5 times respectively in AM peak from 2019 to 2031. Similar order of growth is observed in PM peak. As these two roads are subject to direct and substantial traffic impact of developments, these two road should be separately considered in growth factor assessment or else traffic growth would be underestimated.	Noted. Please refer to the sensitivity test and its assessments in **Chapter 7** of the revised TIA under **Attachment 5**.
4.29	**Figure 2.2** –	
	• Please provide swept path analysis for 12.8 buses at junction of Luen Hong Lane and Tai Lam Chung Road. It seems that buses at Tai Lam Chung Road N/B right turn to Luen Hong Lane will encroach onto the opposite lane.	• Noted. Please refer to **SK24** of **Annex C** of the revised TIA under **Attachment 5** for the 12.8m bus swept path analysis at junction of Luen Hong Lane and Tai Lam Chung Road.
	• Please mark all width of proposed carriageway, footpath, pedestrian crossing on the drawing.	• Noted. The relevant dimensions have been added accordingly. Please refer to **Figure 2.2** of the revised TIA under **Attachment 5**.

	Departmental Comments	Responses to Comments
	• The proposed footpath at road corner encroach onto the area of Tai Lam Chung Fire Station. The consultant should obtain FSD's approval.	• Noted.
	• The southern part of widening of footpath along Tai Lam Chung Road N/B should also be shown on drawing.	• Noted. The drawing has been revised accordingly. Please refer to **Figure 2.2** of the revised TIA under **Attachment 5**.
	• Cross section showing design width of widening of footpath along Tai Lam Chung Road N/B taking into consideration of railings and beam barriers should be provided in the TIA.	• We acknowledge the concerns regarding the street furniture arrangement. Please note that the details will be further reviewed with relevant government departments in detail design stage accordingly.
	• Please review if an additional pedestrian crossing could be provided as shown in red arrow below.	• We acknowledge the concerns regarding the location of the proposed pedestrian crossing at Luen Hong Lane near Tai Lam Chung Road. Please note that the details will be further reviewed with relevant government departments in detail design stage accordingly.
	• Sightline at proposed pedestrian crossing at Luen Hong Lane near Tai Lam Chung Road will be obstructed by the existing fence wall of Tai Lam Chung Fire station (location shown in blue below). Please review and revise. 	• Ditto.

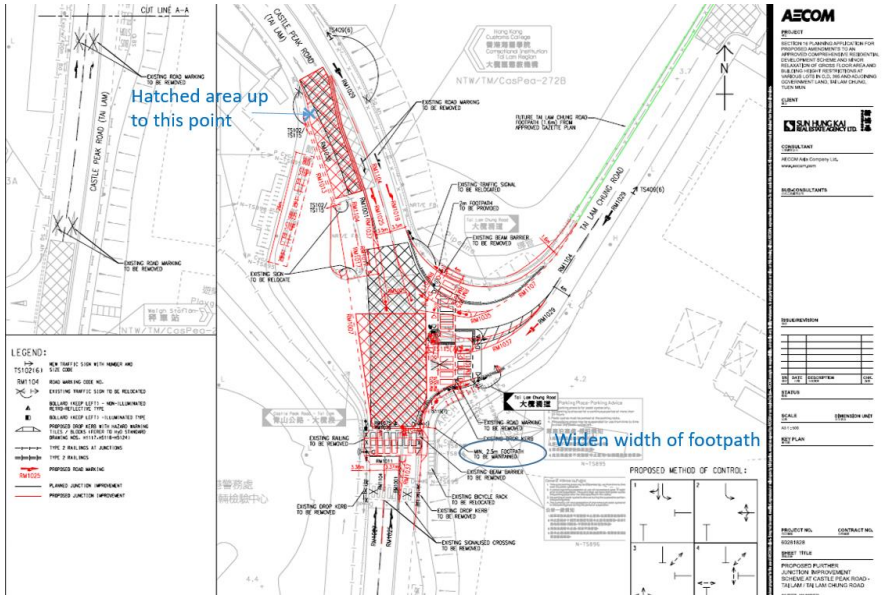
	Departmental Comments	Responses to Comments
4.30	**Figure 6.2** –	
	• As stated in our previous comment, carriageway of Castle Peak Road – Tai Lam should be widened to accommodate traffic islands with the secondary traffic signals at the outer approach lanes for both northbound and southbound traffic at the junction. Secondary traffic signals at traffic islands are essential to enhance road safety. The consultant should explore all possible measures, including but not limited to modification of existing greenery areas for road widening at junction.	• The junction improvement scheme has been further reviewed and revised. Please be advised that the secondary traffic signals are provided at the traffic islands of both bounds of outer approach lanes accordingly. Please refer to **Figure 6.2** of the revised TIA under **Attachment 5**.
	• The RM1104 at yellow box is confusing to Castle Peak Road – Tai Lam S/B traffic and should be deleted. TS "keep left" or "keep right" could be provided at traffic island to indicate traffic lane for vehicles.	• Noted. The junction improvement scheme has been updated accordingly. Please refer to **Figure 6.2** of the revised TIA under **Attachment 5**.
	• RHS Primary signal aspect at left turn lane of Castle Peak Road – Tai Lam S/B should be provided.	• Noted. Please refer to **Figure 6.2** of the revised TIA under **Attachment 5**.
	• Flare length at Castle Peak Road – Tai Lam S/B should be extended as far as practicable taking into consideration of swept path of buses at bus stop. This could further minimize the risk of tailing back of waiting vehicles at S/B outer lane from affecting the traffic at kerbside lane.	• The stopline at the flare length of Castle Peak Road – Tai Lam southbound has been shifted southward to maximize the vehicle queuing. Please refer to the revised junction improvement scheme in **Figure 6.2** of the revised TIA under **Attachment 5**.
	• Width of footpath and pedestrian crossing should be indicated on drawings.	• Noted. Please refer to **Figure 6.2** of the revised TIA under **Attachment 5**.
	• Footpath widening along Tai Lam Chung Road S/B is missing on drawing. Please indicate the footpath widening on drawing.	• Noted. Please refer to **Figure 6.2** of the revised TIA under **Attachment 5**.
4.31	**Others** – Please confirm that the applicant would undertake the proposed works as shown in the TIA and complete the works before population intake.	Please be advised that the Applicant would complete the proposed works before the population intake.

	Departmental Comments	Responses to Comments
4.32	**Figure 4.1** – • 2m wide footpath at Transport interchange is insufficient to cater for waiting area of buses and passage of pedestrian. Please provide a wider footpath.	• Noted. The drawing is revised accordingly. Please refer to **Figure 4.1** of the revised TIA under **Attachment 5**.
	• Please confirm in TIA report that the future management, maintenance and repair of Transport Interchange would be taken by the development.	• Noted. The relevant clause has been included in **Para 4.2.12** of the revised TIA under **Attachment 5** accordingly.
	• In view of wide carriageway at entrance/exit of Transport Interchange, pedestrian refuge island should be provided.	• Noted. The drawing is revised accordingly. Please refer to **Figure 4.1** of the revised TIA under **Attachment 5**.
	<u>Transport Operation Perspective – Comments on 7.11.2025</u>	
4.33	<u>Section 3.5, Table 3.4, R-to-C item 9.14 (Consultant's email on 9 October)</u>	
	• The information of existing public transport services in Table 3.4 is not accurate, e.g. CTB 962P does not have any bus stop located within the area, the originating point of KMB 61A/61M, etc. Please update accordingly.	Noted. **Table 3.4** of the revised TIA under **Attachment 5** has been revised accordingly.
4.34	<u>Section 4.2, Figure 4.1, R-to-C items 9.15-9.16 (Consultant's email on 9 October), Proposed Routeing Plan (submitted via email separately on 13 October)</u>	
	• Please incorporate the proposed routeing plan into the TIA report.	Please refer to **Annex D** of the revised TIA under **Attachment 5** for the proposed routing plans for reference. Please note that the actual arrangement would be subject to agreements from relevant government departments and/or other stakeholders.
	• According to the proposed routeing plan submitted separately via email on 13 October, please advise the route(s) to be diverted via the subject site.	Please note that there are few potential bus/GMB routes could be diverted via the subject site, such as 52X, 61M, 952, etc. Please note that the actual arrangement would be subject to agreements from relevant government departments and/or other stakeholders.

	Departmental Comments	Responses to Comments
	• Please advise whether the proposed additional bus route will ply through Tuen Mun bound of Tuen Mun Road Bus-Bus Interchange ("TMRBBI").	Ditto.
	• As mentioned in the previous R-to-C, the proposed public transport plan shall be supplemented with assessment and planning of public transport services, projected passenger demand, utilization surveys, etc. Please provide the required information.	Please refer to **Chapter 4** of the TIA report under **Attachment 5** for the public transport demand assessment. In additional, please be advised that the public transport plan will be provided under detail design stage.
	• In Section 4.2.1, it considers franchise bus is the main mode of public transport, and therefore introduce a new bus route to connect with TMRBBI. However, the provision of facilities of the proposed PTI in Section 4.2.3, which consists of 32-metre GMB lay-by and a bus lay-by (1 boarding/alighting space and 2 stacking spaces), is considered contradicting with the above consideration in Section 4.2.1.	Please be advised that the proposed provision of 3 bus lay-bys and 4 GMB lay-bys have provided flexibility on the planning of public transport services. The detailed arrangement of the proposed enhancement on public transport services would be subject to further review and consideration by the relevant government departments and/or stakeholders at detailed design stage.
	• Please review the proposed provision the PTI under Section 4.2.3 and justify it against the proposed public transport services. The layout and provision of public transport facilities, including boarding/alighting space, stacking space and passenger waiting area, etc., should be critically considered with a view to accommodate the peak hour demand of 1,235 passengers.	Please be advised that the queuing length of bus passengers would be approximately 17m (i.e. 1,235 pax/hr / 14 trips x 0.2m). The queuing arrangement has indicated in **Figure 4.1** of the TIA report under **Attachment 5** accordingly. Please be advised that the actual queuing arrangement will be further reviewed at detailed design stage.
	• In addition, the consultant should also review and study the availability of space at TMRBBI to accommodate the proposed trips.	Please note that the current spaces availability of space at TMRBBI could not reflect the future condition. Nevertheless, please be advised that the availability of space at TMRBBI will be further studied together with the proposed transport plan at detail design stage and will be subject to the agreement to the relevant government departments and/or other stakeholders.

	Departmental Comments	Responses to Comments
	• According to TPDM, a linear bay provides 1 boarding/alighting space and 2 stacking spaces. Considering the proposed additional route is originated at the proposed PTI, the bus provision (39m bus layby) in the proposed PTI is considered as 1 bus lay-by with 2 stacking spaces, instead of 3 bus lay-bys. The layout of the PTI shall be updated accordingly to incorporate any additional bus route(s), including diversion of existing bus route or new route.	Please be clarified that the proposed covered transport layby is privately operated by the private developer. As bus route operating at the covered transport layby has not been confirmed, allocation of the bus layby provision (39m) will be subject to future Public Transport Plan. Therefore, the details of the covered transport layby arrangement would be further reviewed at detailed design stage.
4.35	<u>R-to-C item 9.17 (Consultant's email on 9 October)</u>	
	• Considering private vehicles could pick-up and drop-off at other locations within the site (e.g. next to residents' own block for convenience), please advise the rationale behind the provision of general lay-by within the PTI.	To optimize the use of the site area, it is proposed that the space be shared between public transport services and a general lay-by. Furthermore, appropriate management measures will be considered during the detailed design stage to ensure the smooth operation of public transport services.
	• In any case, we would like to reiterate that the PTI shall not share with the other vehicles and be exclusive to the public transports only.	Ditto.
4.36	<u>R-to-C item 9.20 (Consultant's email on 9 October)</u>	
	• It is noted that the PTI will be a covered PTI with resident development above it. Please advise if it is otherwise.	Please be advised that the covered transport layby will be covered by podium above, subject to detailed design stage.
4.37	<u>Figure 4.1, R-to-C item 9.21 (Consultant's email on 9 October)</u>	
	• Noted the location of staff ancillary facilities. Please advise if the facilities will be provided by the private developer upon construction.	Please be advised that the relevant facilities will be provided by the private developer.

	Departmental Comments	Responses to Comments
	Traffic Engineering Perspective – Comments on 17.11.2025	
4.38	**Table 3.3 –** It is noted that the Link Capacity and Flow/Capacity Ratio is revised for Link L1. Please explain how the figures are calculated.	Please be clarified that the figures were calculated taking into consideration that 1.) Tuen Mun Road EB is 3-lane dual carriageway; 2.) the observed PCU factor is 1.2, the estimated link capacity for Tuen Mun Road EB is 5,640 pcu/hr (i.e. 4,700 veh/hr x 1.2 pcu/veh).
4.39	**Table 6.2 –** Compared to your submission in August 2025, PM Peak for J5 has increased from 44% to 59%. Please explain and provide calculation for the change.	Please note that the road marking on the farside lane of Castle Peak Road – Tai Lam northbound has been revised from a right-turn only movement to a combined straight-ahead and right-turn movement, while the marking on the nearside lane remains unchanged. As a result, the junction capacity will be slightly affected. Nevertheless, the junction capacity for J5 would be still operating within capacity during AM and PM peak periods. Please refer to the revised **Figure 6.2** of the TIA under **Attachment 5**.
4.40	**Table 6.2 and 7.1 –** Comparing Table 7.1 and 6.2 Junction J5, AM Peak (24% -> 20%), PM Peak (59% ->43%), the flow is more congested using traffic modelling approach. Please explain if your development scheme provide any improvement.	Please be advised that the generally acceptable junction capacity for a signalized junction would be 15% or higher. As the proposed junction improvement scheme is expected to achieve at least 15% during both AM and PM peak periods for both traffic forecasted approaches, the scheme is considered acceptable from a traffic perspective.
4.41	**Table 6.3 and 7.2 –** Comparing Table 6.3 and 7.2, the queue length of Castle Peak Road-Tai Lam SB PM Peak nearly doubled (18m/24m to 30m/55m), using traffic modelling approach. Please explain if your development scheme provided any improvement.	Please be advised that the available queue length at Castle Peak Road – Tai Lam SB would be 42m which is sufficient to accommodate the estimated queues for both traffic forecasted approaches. Therefore, the proposed junction improvement scheme (**Figure 6.2** of the TIA under **Attachment 5**) is considered acceptable from traffic perspective.
4.42	**Table 5.4 –** Please refer to our similar comment on Table 5.4 in previous RtC. Traffic growth at Tai Lam Chung Road and Castle Peak Road - Tai Lam substantially incase by 5 times and 2.5 times respectively in AM peak from 2019 to 2031. These two roads should be separately considered in assessment. Please explain how these two roads are separately considered in growth factor assessment.	Please note that the growth factor methodology is intended to estimate traffic growth in the vicinity of the subject site. As the primary roads serving the site are Tai Lam Chung Road, Castle Peak Road – Tai Lam, and Tuen Mun Road, reviewing the combination of these links is considered comprehensive and sufficient from a traffic perspective.

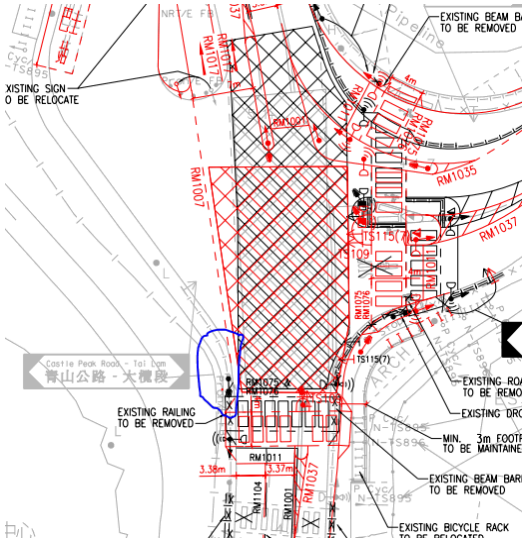
	Departmental Comments	Responses to Comments
4.43	**Figure 4.1 –** Please refer to our similar comment on Figure 4.1 in previous RtC. 2m wide footpath at Transport interchange is still not revised. The waiting area is insufficient for pedestrians.	Noted. **Figure 4.1** of the TIA under **Attachment 5** has been revised accordingly.
4.44	**Figure 6.2 –** The width of footpath min. 2.5m is slightly narrow. Please widen the width of the footpath. (see figure below)	Noted. **Figure 6.2** of the TIA under **Attachment 5** has been revised accordingly.
4.45	**Figure 6.2 –** Shorten the area of hatch area (see figure below)  	Noted. **Figure 6.2** of the TIA under **Attachment 5** has been revised accordingly.
	<u>Bus Development Perspective – Comments on 17.11.2025</u>	
4.46	**Table 4.1 –** It is noted that the modal spilt for public transport is 73%, please supplement the split of each public transport mode, including but not limited to franchised bus, GMB, etc.	According to Table 3.6 of TCS 2011, public transport accounted for a total of 73%, which was distributed among Railway (30%), Franchised Bus (27%), Public Light Bus (13%), Tram (2%), and Ferry (1%).

	Departmental Comments	Responses to Comments
4.47	**Section 4.2.2 –** It is observed that the "public transport" only includes bus service. Please review in order to holistically demonstrate the demand on each public transport mode. Please also supplement the projected daily patronage of the proposed additional franchised bus service.	Given the remote location and the availability of nearby public transport facilities, bus services are considered the most appropriate mode of public transport for the proposed development. Nevertheless, other options such as Public Light Bus (PLB) may be further examined during the detailed design stage. In addition, by assuming the bus services will be operating for 15 hours from 07:00 - 22:00 daily, the daily patronage of the proposed additional franchised bus services would be projected to 18,525 ped (i.e. 1,235 ped/hr (as derived in **Table 4.1** of the TIA under **Attachment 5**) x 15 hr).
4.48	**Supplementary information on proposed routing Plan (submitted via email separately on 13 October) –** It is observed that i) diversion of existing franchised bus services and ii) new franchised bus service have been proposed in the TIA, please advise and supplement the spilt of the passengers under these two groups of services, and hence provide a detailed proposal on the franchised bus plan demonstrating how the franchised bus service can cater passengers generated from the site. Also, as there is a certain number of bus routes serving TMR BBI with various destinations (eg. Hong Kong Island, New Territories East, Kowloon East, etc.), please also include the origin/destination pairing of the passengers.	Please refer to **Section 4.2** of the revised TIA under **Attachment 5** for the details on passenger distribution and a conceptual proposal on the franchised bus services for your review. Please note that the detailed arrangement of the proposed enhancement on public transport services would be subject to further review and consideration by relevant government departments and/or stakeholders in detail design stage.
	<u>TONT's Comments on TIA – Comments on 24.11.2025</u>	
4.49	Section 4.2 - According to Sections 4.2.1 and 4.2.2, it is proposed to introduce 14 trips between the Development and Tuen Mun Road Bus-Bus Interchange ("TMRBBI") during peak hours, which contradicts with the proposed public transport plan in Sections 4.2.5 and 4.2.6.	Noted. The typos in **Table 4.2** of the revised TIA under **Attachment 5** have been revised accordingly.

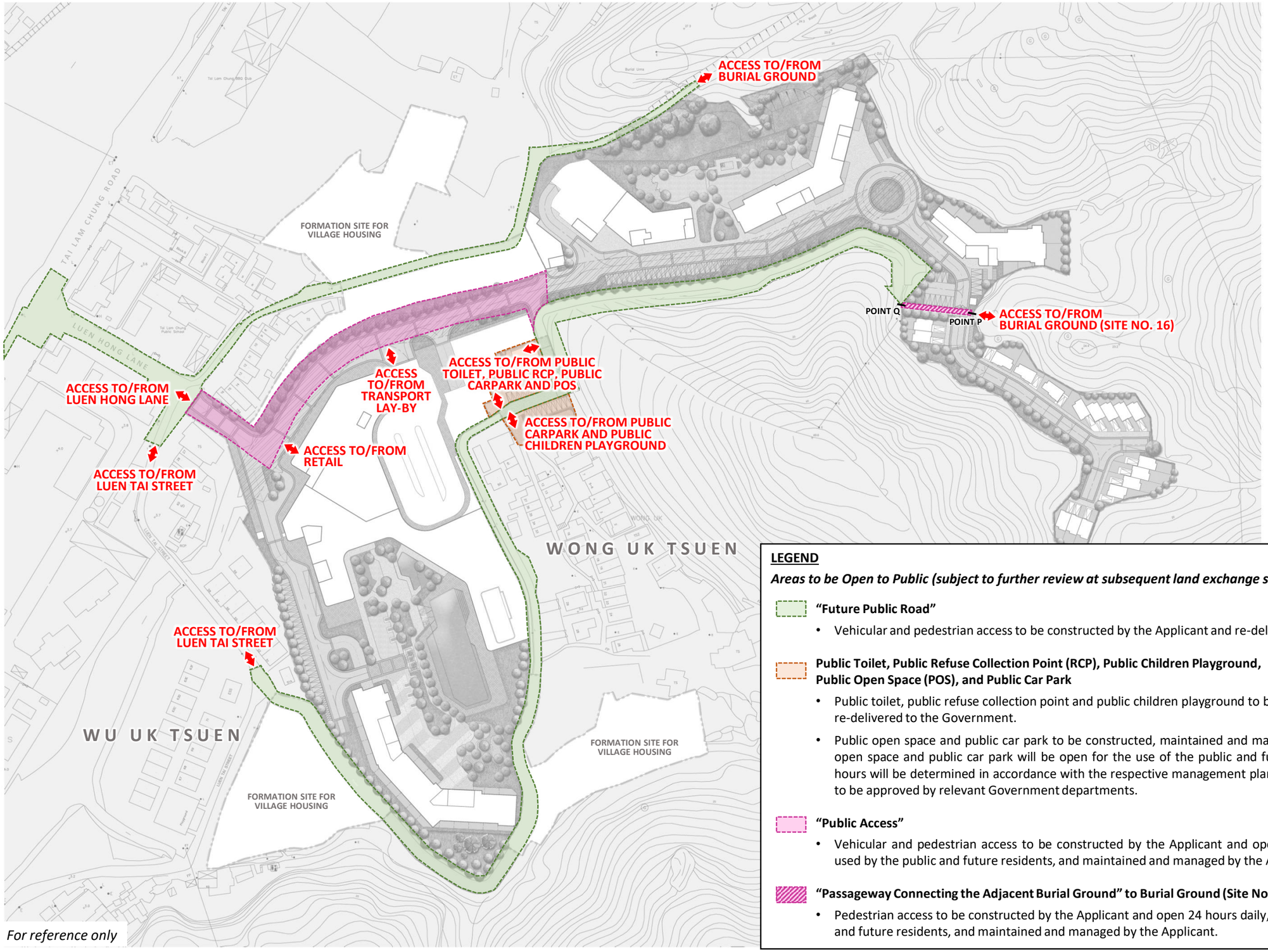
	Departmental Comments	Responses to Comments
4.50	Section 4.2.3 - According to general understanding and patronage of various transport mode, it is expected that the passenger demand of Kowloon/urban bound should be higher than that of Tuen Mun bound. Please advise the rationale and calculation behind the directional split (i.e. 65% to Tuen Mun, 35% to Kowloon/Hong Kong Island) in Section 4.2.3.	Please be clarified that two types of bus services are proposed to accommodate the future public transport demand induced by the subject site: 1.) New circular bus services and 2.) En-route bus stop within the proposed TI. For conservative approach to assess the traffic impact induced on the surrounding road network, it is assumed that 65% of the passengers would take the proposed circular bus services to/from TMRBBI while the remaining passengers would be served by the proposed en-route stop within the proposed TI. It should be noted that the assumed distribution could be further reviewed during detailed design prior to population intake. Nonetheless, the proposed TI has provided two separate bus bays to allow flexibility for future changes in demand distribution.
4.51	Section 4.2.5 - Please advise the passenger demand and proposed headway of the bus route connecting with TMRBBI during non-peak hours, and advise if it is sustainable.	Please note that the subject TIA report is to identify whether the traffic impact induced on the surrounding road network by the subject development during AM and PM peak periods. As mentioned in the TIA, the additional bus routes would accommodate the public transport demand induced by the subject development while the proposed junction improvement (J5) would also cater the traffic impact during both peak periods. Thus, there is no insurmountable traffic impact imposed onto the local road network due to the Proposed Development. Nevertheless, the details on public transport planning including the proposed headway as well as operating hours would be further reviewed and consideration by relevant government departments and/or stakeholders in detailed design stage.

	Departmental Comments	Responses to Comments
4.52	Section 4.2.6 - Please review and study the availability of space at TMRBBI to accommodate the proposed additional trips.	Please note that the proposed circular route is designated as en-route at TMRBBI for passenger boarding and alighting. Given that TMRBBI currently provides a designated drop-off area, it is anticipated that the existing facilities can accommodate the additional trips generated by the Proposed Development. Nevertheless, a detail assessment of the bus stop capacity as well as passenger queuing arrangement at TMRBBI will be carried out in detailed design stage prior to the population intake.
4.53	Section 4.2.10 - It is noted that the proposed Public Transport Interchange will be constructed, managed and maintained by the private developer. The corresponding management office is required to cooperate with the TD's traffic and public transport management plans, including but not limited to the designation/ relocation/ removal of bus layby(s), GMB stand(s) and/ or any other traffic measures, and should erect/ replace/ remove relevant traffic signs and/ or road marking thereat, and allow full access by the vehicle types (e.g. buses, minibuses, etc.) to use the concerned road sections as decided by the TD.	Noted.
4.54	Figure 4.1 - Please advise the area of the staff ancillary facilities.	Please be advised that in accordance with TPDM's requirement, a minimum of 72m^2 staff ancillary facilities would be provided as presented in **Figure 4.1** of the revised TIA under **Attachment 5**.
4.55	Figure 4.1 - TE's comment should also be sought on the design of the proposed PTI.	Noted.

	Departmental Comments	Responses to Comments
4.56	R-to-C item 4.47 - While the estimated hourly transport demand in peak hours is 1,235 in Section 4.2.3, it is anticipated that the passenger demand will be lower in non-peak hours, please advise if the projected passenger demand is able to sustain a bus route.	Please note that the subject TIA report is to identify whether the traffic impact induced on the surrounding road network by the subject development during AM and PM peak periods. As mentioned in the TIA, the additional bus routes would accommodate the public transport demand induced by the subject development while the proposed junction improvement (J5) would also cater the traffic impact in both peak periods. Thus, there is no insurmountable traffic impact imposed onto the local road network due to the Proposed Development. Nevertheless, the details on public transport planning including the proposed headway as well as operating hours would be reviewed and consideration by relevant government departments and/or stakeholders in detailed design stage.
4.57	R-to-C item 4.47 - Please review the proposed operating period of the bus services by making reference to the existing travelling pattern of residents in Tuen Mun district. **<u>TONT's Further Comments on TIA – Comments on 4.12.2025</u>**	Ditto.
4.58	Please add the following in the TIA Report: "It is noted that the proposed public transport plan and facilities in the TIA is for assessment purpose only. The final PTI layout and public transport plan to address the public transport demand arising from the development, including introduction of new routes or changes on existing public transport services, will be further reviewed in detailed design stage and decided by TD, subject to a host of factors including actual population intake date, prevailing public transport services at that time and etc."	Noted. **Section 4.2.13** of the revised TIA under **Attachment 5** has been supplemented accordingly.

	Departmental Comments	Responses to Comments
	<u>Traffic Engineering Perspective – Comments on 5.12.2025</u>	
4.59	Please provide drawing to clearly show road connectivity between TI and the development vehicular access. Please confirm that the road connectivity is 24hr unobstructive road access and will be managed and maintained by the development.	The vehicular routing between TI and the development vehicle access is presented in **Figure 2.1** of the revised TIA under **Attachment 5**. Please note that the road connectivity between TI and the development vehicular access will be open to public during the TI's operation and will not be obstructed by control gate.
4.60	Please provide drawing to clearly show road connectivity between public village parking spaces and development vehicular access. Please confirm that the road connectivity is 24hr unobstructive road access and will be managed and maintained by the development.	According to the draft lease plan, the public village parking spaces will be maintained and operated by the Applicant subject to the agreement from relevant government departments. Additionally, please be clarified that the public village parking spaces are accessible via the existing Luen Tai Street on 24-hour basis as demonstrated in **Figure 2.1** of the revised TIA under **Attachment 5**.
4.61	As nos. of pedestrians heading to bus stop will increase, the footpath (circled in blue) should be widened by converting existing planting area to pavement. Please mark the width of widened footpath on drawing.  	Noted. **Figure 6.2** of the revised TIA under **Attachment 5** has been revised accordingly.

Annex A
Indicative Access Arrangement Diagram



For reference only

LEGEND

Areas to be Open to Public (subject to further review at subsequent land exchange stage)

"Future Public Road"

- Vehicular and pedestrian access to be constructed by the Applicant and re-delivered to the Government.

Public Toilet, Public Refuse Collection Point (RCP), Public Children Playground, Public Open Space (POS), and Public Car Park

- Public toilet, public refuse collection point and public children playground to be constructed by the Applicant and re-delivered to the Government.
- Public open space and public car park to be constructed, maintained and managed by the Applicant. The public open space and public car park will be open for the use of the public and future residents, which the opening hours will be determined in accordance with the respective management plans to be submitted under lease and to be approved by relevant Government departments.

"Public Access"

- Vehicular and pedestrian access to be constructed by the Applicant and open 24 hours daily, which would be used by the public and future residents, and maintained and managed by the Applicant.

"Passageway Connecting the Adjacent Burial Ground" to Burial Ground (Site No. 16)

- Pedestrian access to be constructed by the Applicant and open 24 hours daily, which would be used by the public and future residents, and maintained and managed by the Applicant.

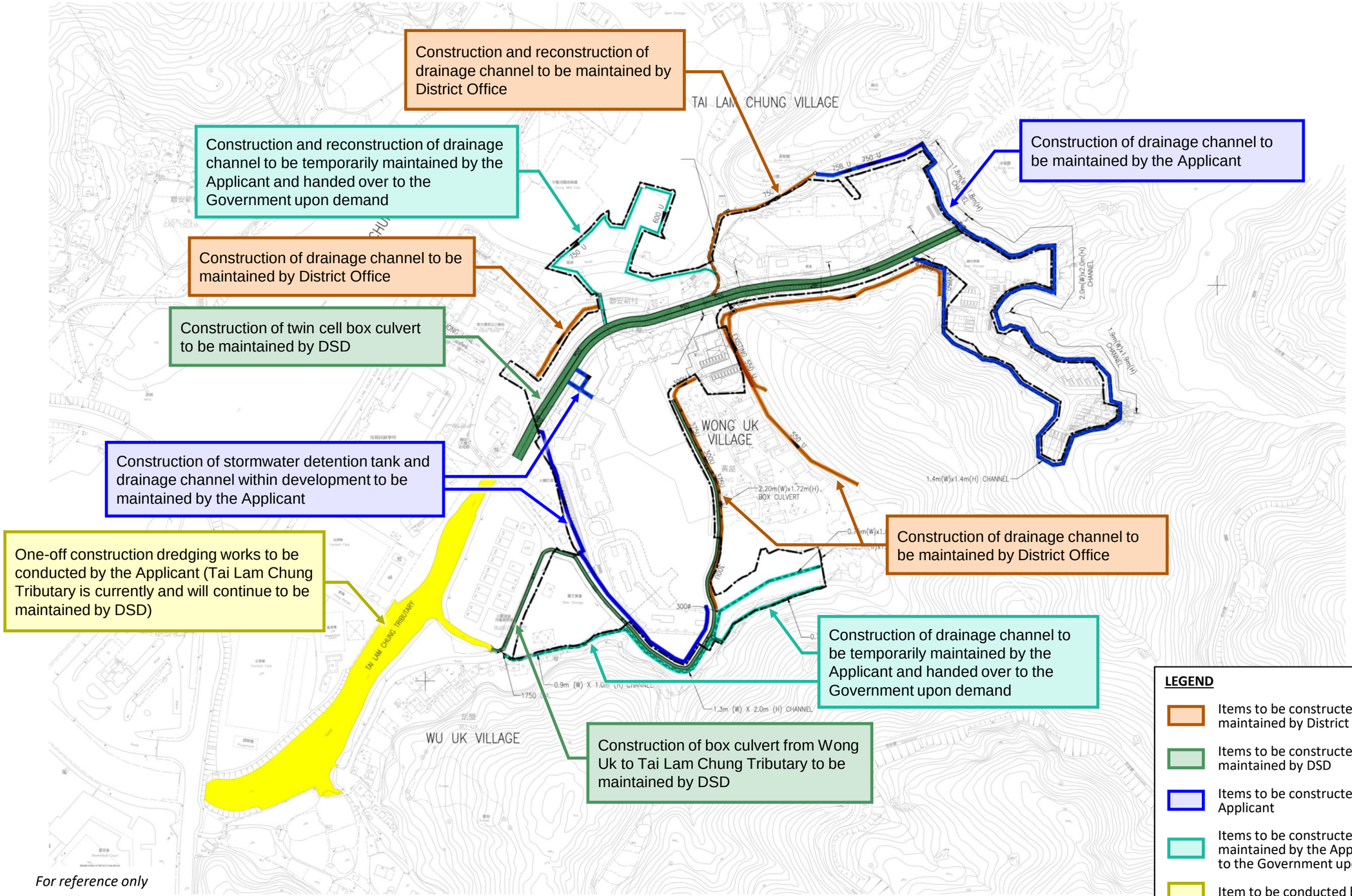
llewelyn davies

Title

Indicative Access Arrangement Diagram

Checked	DH	Drawn	PW
Rev	0	Date	Dec 2025
Scale N/A		Figure A1	

Annex B
Simplified Illustrative Diagram of Proposed Draiange Arrangement



For reference only

llewelyn davies	Title: Simplified Illustrative Diagram of Proposed Drainage Arrangement	Checked	DH	Drawn PW
		Rev	0	Date Dec 2025
		Scale N/A		Figure B1

Annex C
Extract of EA for Application No. Y/TW/18 (for reference)

the site survey conducted on 3 March 2022 and 4 April 2023, no chimney is identified within the HKPSG recommended buffer distance of 200m from the Subject Site.

4.6 Review on Impact from Proposed Carpark

4.6.1 Basement carpark has been proposed for the Proposed Development. The air quality inside the basement carpark should satisfy the air pollutant standards as recommended by the ProPECC PN 2/96 Control of Air Pollution in Car Parks. Therefore, the mechanical ventilation system and layout the basement carpark should be properly designed. Furthermore, the exhaust outlet of the mechanical ventilation system of the basement carpark should also be designed by facing away from the nearest air sensitive uses as practicable as possible to ensure not to cause a nuisance to the occupants/ residents of the air sensitive uses including the surrounding developments and the Proposed Development. As the Project is still under initial design stage, the location of the exhaust outlet of the mechanical ventilation system is not available yet.

4.7 Review on Potential Odour Impact from Surroundings

4.7.1 Yau Kom Tau Water Treatment Works (YKTWTW) is within 500m assessment area, which is considered a potential source that may cause odour nuisance to the Proposed Development. According to the layout plan of YKTWTW (see **Appendix 3.1**), there are three sludge holding tanks located at the southwest side of YKTWTW. The separation distance between the sludge holding tank and the Proposed Development is about 90m (see **Figure 4.3**).

4.7.2 As confirmed by WSD, no odour would be generated from the sludge holding tanks. The reply from WSD regarding odour issue of sludge holding tanks at YKTWTW is shown in **Appendix 4.3**. Furthermore, an odour survey was conducted on 3 March 2022 to verify the odour situation at YKTWTW. The route of odour patrol is along the internal access road in YKTWTW. No adverse odour was noticed around the vicinity of YKTWTW. Therefore, no adverse odour impact on the representative ASRs in the vicinity is expected.

4.8 Review on Potential Odour Impact from Proposed On-site Sewage Treatment Plant

4.8.1 Sewage generated by the Proposed Development is proposed to be handled by an on-site sewage treatment plant (STP) which the design will be made reference to EPD's "Guidelines for the Design of Small Sewage Treatment Plants". The location of Proposed STP and its exhaust, and the separation distances between the exhaust of Proposed STP and surrounding ASRs are shown in **Figure 4.4**. The Proposed STP is a fully enclosed facility located at the basement of the proposed development with the exhaust at the south-eastern corner of the Subject Site. At this planning application stage, the tentative height of the exhaust is 2m about ground, but its finalized location will be further reviewed during the detailed design stage. According to the sewerage impact assessment, the estimated peak sewage generation from the Proposed Development is around 2142 m^3/day.

4.8.2 In order to minimize the potential odour nuisance, the mechanical ventilation system of the STP will be connected to an odour removal system. The mechanical ventilation system would extract the potentially odorous air within the STP to the odour removal system during the operation of the STP. The normal efficiency of the odour removal system is 99% while some systems can achieve removal efficiency of 99.5% (see **Appendix 4.4** for reference). With the adoption of odour removal system, it is anticipated that the surroundings ASRs will not be subject to unacceptable odour impact from the operation of the proposed STP.

4.8.3 There is no detailed information of the proposed STP in this preliminary design stage, however, an odour impact assessment will be submitted during detailed design stage once the design of this STP is available to identify the removal efficiency required for this STP. The odour assessment criterion of 5 OU based on an averaging time of 5 seconds should be met for all nearby ASRs including the air-sensitive uses of the proposed development such as residential towers located on top of the STP.

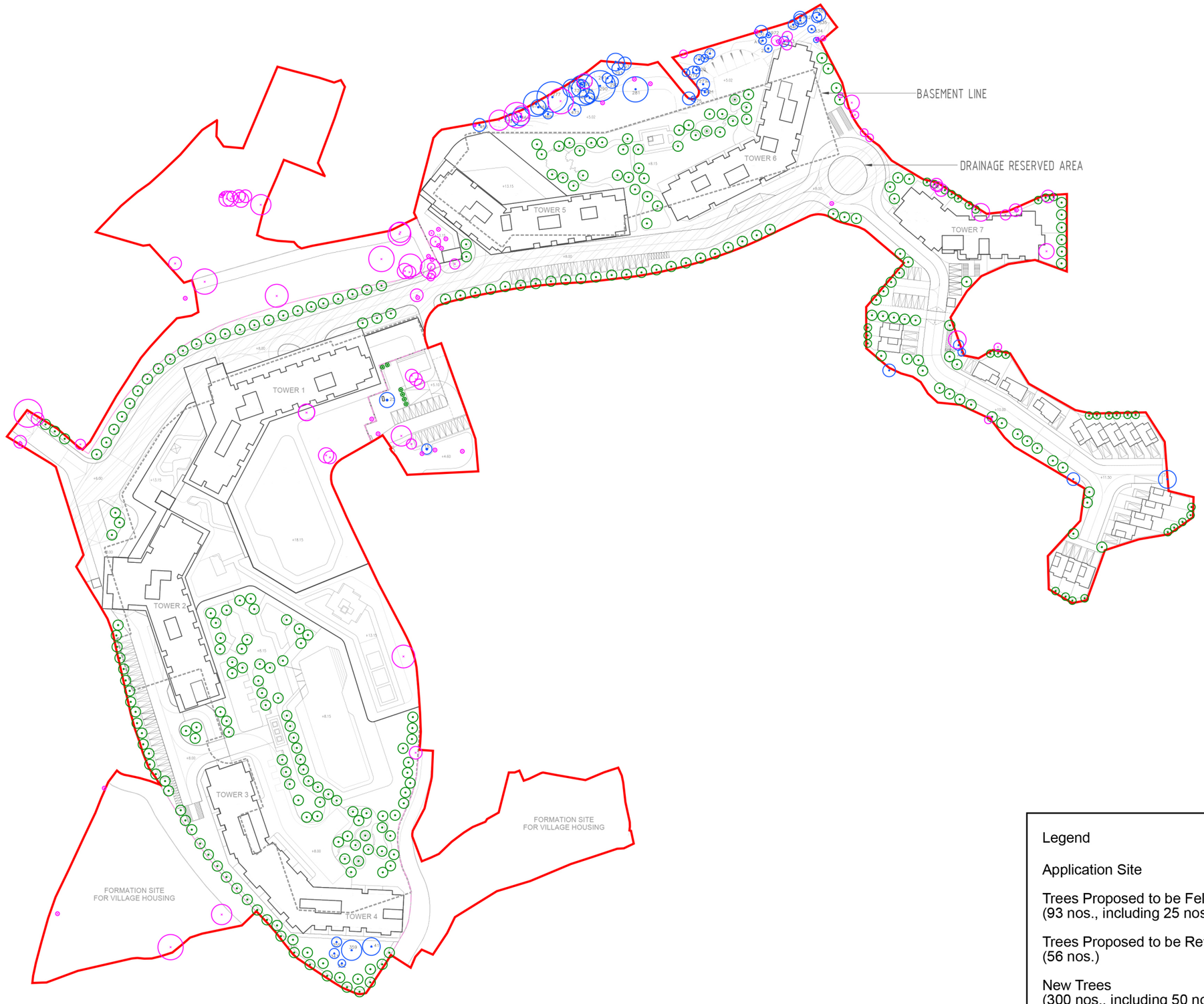
4.8.4 Apart from the adoption of odour removal system, regular maintenance would be carried out to ensure the odour removal efficiency is maintained at/above the design requirement.

4.8.5 The following regular maintenance process are also proposed:

- Sludge should be removed regularly to prevent accumulation of odourous gas;
- Regular inspection with measurement of odour concentration at the exhaust should be conducted to check for leakage of odourous gas and the efficiency of the odour removal system;
- Maintain the removal efficiency of screenings and grits by flushing the screens and grit sump regularly to prevent blockage;
- Screenings, grits and worn filters should be stored in sealed containers inside the STP and during removal for disposal;
- Replace worn activated carbon filter/bio trickling filter to maintain the odour removal efficiency at 99.5%;
- Clean all the tanks with water regularly;
- Store and handle the screening waste inside a fully enclosed structure to avoid odour nuisance;
- No odorous materials shall be stockpiled overnight at the site;
- Maintain negative pressure inside the facility to prevent foul air from flowing out;
- Inhibit the generation of odour compound in liquid phase or removal of the odour compound formed in liquid phase by elevating the pH or providing oxygen source;
- Maximize the sewage flow velocity in sewers;
- Develop a good housekeeping program for the sewage collection systems to prevent the development of anaerobic conditions.

4.8.6 With adequate odour removal system and regular maintenance, the odour impact due to the operation of the STP would not be insurmountable.

Annex D
Illustrative Diagram of Tree Treatment Proposal



Legend

- Application Site
- Trees Proposed to be Felled (93 nos., including 25 nos. dead trees)
- Trees Proposed to be Retained / Transplanted (56 nos.)
- New Trees (300 nos., including 50 nos. of new trees in removable planters along drainage reserve)

Remark: For details about the tree treatment proposal, please refer to the Landscape Design and Tree Preservation Proposal enclosed in the Planning Statement.

Title

Illustrative Diagram of Tree Treatment Proposal

Checked	DH	Drawn	PW
Rev	0	Date	Dec 2025
Scale		Figure	D1