Table 1: S.16 Planning Application No. A/TM/601 - Proposed House at Tuen Mun Town Lot No. 550, Tuen Mun, New Territories.

Response to Comments on Environmental Assessment Report (R8944_2.1)

	EPD's Comments	The Consultant's Responses
Air Quality		
1.1	Table 2.4 - Please indicate the reference source for the "Road Type" column in the table footnote (e.g. Annual Traffic Census 2024, confirmed by TD).	Please refer to updated Table 2.4. *Note:* *[1] The road type of roads is made reference to the Annual Traffic Census 2024 and confirmed by TD.*
1.2	RtoC#1.8 - Please follow up and provide TD's confirmation on road types once available.	TD's confirmation on road types is provided in Appendix 2.
1.3	Section 2.4.4 - 1.3.1 Please remove "10 m and 5 m" in Line 8. 1.3.2 Please revise "subjected" in the second-to-last line to "subject".	Revised accordingly.
Noise		
2.1	Section 3.2 - In addition to industrial noise sources, other fixed noise sources within 300m area should also be considered, particularly those potentially adopting outdoor PA system, e.g. Tuen Mun Riding School Substation, Sports Centre Archery Cum Gateball Court, Tuen Mun Recreation and Sports Centre etc. Please review and verify.	Please refer to updated S3.2 and Figure 9. 3.2.1 Desktop studies and onsite surveys have been conducted to identify the potential industrial noise sources within 300m assessment area. According to the observation from onsite surveys, Tuen Mun Riding School Substation and Sports Centre Archery Cum Gateball Court (outdoor PA system) to the south of the Application Site, Tuen Mun Recreation and Sports Centre (outdoor PA system) to the northeast of the Application Site are identified. Their location is shown in Figure 9. 3.2.2 Onsite surveys were conducted on 27 June and 24 November 2025, no noticeable noise / PA system sound was observed along the boundary of Tuen Mun Riding School Substation, Sports Centre Archery Cum Gateball Court, Tuen

		Mun Recreation and Sports Centre. In addition, the direct line of sight between proposed development and identified industrial noise sources is blocked by natural terrain (Approximate from 24mPD to 38mPD), and the separation distance of at least 177m from the Application Site to the nearest industrial noise source (i.e. Sports Centre Archery Cum Gateball Court). In view of the hindered line of sight and long separation distance, it is anticipated that the Proposed Development would not be subject to adverse industrial noise impact. Location of the industrial noise sources and separation distance from the Application Site is shown in Figure 9.
2.2	Section 3.4.2.3 - The statement "Based on the tentative completion year of Proposed Development (Year 2031), traffic forecast for the Year 2046 (AM Peak) on the road carriageways in the vicinity of the Proposed Development,..." Since traffic data of both AM & PM peak are provided in Appendix 2, please review and update the sentence, if appropriate.	"traffic forecast for the Year 2046 (AM Peak) on the road carriageways…" is revised to "traffic forecast for the Year 2046 on the road carriageways…" for better presentation.
2.3	Noise Model – 2.3.1 TD's endorsement for the traffic flow data is pending. Please supplement. 2.3.2 The boundary wall of the proposed house development is not included in the model. Please update. 2.3.3 Appendix 3 - Base Case (AM) - "G/F, N10" seems incorrectly referred to the result of PM. Please review and update.	- TD's endorsement for the traffic flow data is provided in Appendix 2. - The boundary wall of the proposed house development is not included in the model for a more conservative approach. No noise model update is anticipated in this NIA (R8944_v2.2) Submission. - Please refer to updated Appendix 3, result of AM for "G/F,N10" has been revised.
Waste Management		
3.1	Section 5.5.3 – Please confirm whether the population of the proposed 2-storey house is estimated to be 3.	It is confirmed that population of the proposed 2-storey house is estimated to be 3.
Land Contamination		
4.1	Section 6.3.2 & Appendix 4 – Previous comment has not been duly addressed. It appears that the 2024 aerial photo is missing from the report. Please supplement.	2024 aerial photo has been provided in Appendix 4.

impact on horse riders and horses, electronic gates will be installed on both sides of the intersecting points so that the drivers must stop and check the traffic condition before entering the horsing trail. Besides, warning signs will also be erected for drivers and horse riders to alert them to pay attention at the road intersection point. Safety measures will also be adopted during the road widening / improvement works of the proposed access road. The Applicant is also committed to arrange ongoing communication and meetings with relevant parties/departments to address their concerns and implement respective measures to handle any further potential issues.

4.7 The car parking spaces provided for the proposed development will comply with the requirement under the HKPSG. The proposed house will provide two proposed parking spaces for private vehicles (2.5m x 5m) for residents / visitors located at the carport at the G/F of the proposed house. One disabled parking space (3.5m x 5m) and 1 loading/unloading space (3.5m x 7m) for light goods vehicle (LGV) will be provided to the north of the proposed house. A security guard will be present at the guard room to manage the traffic flow.

5. TECHNICAL ASSESSMENTS

Tree Survey, Landscape and Tree Preservation Proposal

5.1 A Landscape Proposal and Tree Survey Report (see **Appendix 1**) is prepared by ADI Limited to assess the potential landscape impact on the Application Site and to provide landscape design of the proposed residential development.

Tree Survey

5.2 The Application Site has been vacant for years with no tree exactly located within the site. However, 3 existing trees (Artocarpus heterohpyllus) are located on / very close to the site boundary and seriously leaning into the site, which would be affected by the roadworks or site formation works for the proposed development. Besides, the proposed access road from San Shek Wan Road to the Application Site would affect another 20 trees outside the Application Site. All of the affected trees are not registered old and valuable trees and with generally fair to poor health conditions. Having considered the species and condition of these affected trees, they are not suitable candidates for tree transplanting, therefore, felling of the above 23 trees is recommended.

5.3 The new tree planting proposal intends to create a good quality of green environment for future residents with proper and good quality planting establishment. A total of 17 new trees of heavy standard stocks would be planted with 1:1 replanting ratio (17 trees felled: 17 new trees planted), with exclusion of the removal of 6 nos. of weedy trees, Leucaena leucocephala.

Landscape Design Proposal

5.4 The landscape design concept for the proposed residential development provides a synthesis between the contemporary design philosophy and sustainable design principle responding to both site context and the proposed nature of the development, and respects the surrounding landscape features. The proposed scheme aims to provide a high-quality living environment for the future residents. The landscape area will be designed with contemporary design language and sustainable principles which will provide private relaxing and recreational space for the residents. A leisure lawn with benches and embraced with trees is set at the front court creating share and comfortable environment for relaxing as well as an intimate garden courtyard for the residents. Upon full establishment of greening measures in the landscape design proposal, the proposed greenery coverage within the development will not be less than 555.6 sq.m. (about 30% of the total site area of 1,852 sq.m.), which complies with the 30% OZP greenery requirement under the subject “REC” zone.

Annex B

Replacement Pages of the Landscape Proposal with Tree Survey Report
Replacement Page of the Planning Statement

Existing Trees

2.7 The site is vacant. Refers to the recent topographical survey update of existing tree location, there is no tree (base level) exactly located within the site. However, there are 3 nos. of existing trees, A149, A150 and A162 which located on/very close to the site boundary, and which have been contained in the previous and the recent tree survey. The main trunk of these existing trees and majority of their crown spread are seriously leaning into the site, which will be affected by the roadworks or site formation works for proposed boundary wall/ retaining wall and/or periphery drainage system which are required by the proposed development. Besides, another 20 trees (including Tree A136 and A147) are observed along the existing track connecting San Shek Wan Road and the site which will be affected by the proposed EVA/new access road to the site.

2.8 No registered Old and Valuable Trees (DEVB TC(W) No. 5/2020 Registration and Preservation of Old and Valuable Trees) and no protected specimen under Endangered Species of Animals and Plants Ordinance Cap. 586, the Rare and Precious Plants of Hong Kong (Status in China), and under China Plant Red Data Book exists on site or being affected.

2.9 Existing trees condition and their treatment as result of proposed development refer to **Appendix A Tree Survey Report.**

2.10 Having considered the tree species, which are weedy trees, poor condition of these affected trees, trees have unrecoverable defects, the affected trees are not suitable candidate for tree transplanting, and therefore tree felling is recommended. According to the tree survey findings, unrecoverable defects are frequently found in many existing trees. Defects include seriously leaning, epicormic sprouts, unbalanced crown/form, exposed and restricted rooting area that are unfavourable and not recommended to be retained. The proposal concludes that 17 trees are required of tree felling plus the removal of 6 weedy trees, *Leucaena leucocephala*. Trees of low amenity value and/or having defects will be replaced by a combination of high-quality broadleaf and ornamental trees in the proposed development.

2.11 The new tree planting proposal intends to create a good quality of green environment for future residents with proper and good quality planting establishment. A total of 17 new trees of heavy standard stocks would be planted with 1:1 replanting ratio (17 trees felled: 17 new trees planted) with excluding the removal of 6 no. of *Leucaena leucocephala*.

2.12 The selection of good quality species will enhance the visual amenity of the site, improves bio-diversity in the local landscape context and provides a high-quality living environment for the future residents. Tree planting opportunities have been maximised within the proposed development in balance with the provision of other facilities, utilities and traffic layout arrangement necessarily required for the residents. Implementation of planting proposal will create a high-quality living environment, and will establish the character and identity for the future development. With the full establishment of the planting proposal, the local landscape context and visual amenity would be enhanced.

3.0 Project Description

3.1 The site is proposed for a house development comprises of a 2-storey house, a guard room, an underground septic tank, car parking spaces and associated landscape areas. The development also involves an EVA/new access road connecting to San Shek Wan Road.

4.0 Landscape Design Proposal

4.1 The concept underpinning the landscape design of proposed development is to provide a synthesis between the contemporary design philosophy and sustainable development

3.0 Existing Vegetation

3.1 The site is vacant. Refers to the recent topographical survey update of existing tree location, there is no tree (base level) exactly located within the site. However, there are 3 nos. of existing trees, A149, A150 and A162 which located on/very close to the site boundary, and which have been contained in the previous and the recent tree survey. The main trunk of these existing trees and majority of their crown spread are seriously leaning into the site, which are potentially affected by the roadworks or site formation works for proposed boundary wall/ retaining wall and/or periphery drainage system which are required by the proposed development. Besides, another 20 trees (including Tree A136 and a147) are observed along the existing track connecting San Shek Wan Road and the site which are potentially affected by the proposed EVA/new access road to the site.

3.2 A total of 7 tree species were identified in the survey. About 26% of existing trees are self-seeded weedy trees, *Leucaena leucocephala.* Another 43% are also self-seeded trees with prolific nature, such as *Bauhinia variegata and Macaranga tanarius* var. tomentosa. The remaining are fruit trees, native/ exotic plantation species that are commonly found in Hong Kong and are few in numbers. **Table A2.1** below listed the tree species surveyed and their relative abundance. Tree composition contains 3 native species and the other 4 are exotic species which accounts for 21% and 79% of total tree number respectively.

3.3 No registered Old and Valuable Trees (DEVB TC(W) No. 5/2020 Registration and Preservation of Old and Valuable Trees) and no protected specimen under Endangered Species of Animals and Plants Ordinance Cap. 586, the Rare and Precious Plants of Hong Kong (Status in China), and under China Plant Red Data Book exists on site or being affected.

3.3 The existing tree locations are illustrated on **Annex III – Tree Treatment Plan**. Identification of tree species, form and health condition of these trees are reviewed in the following paragraphs and listed in **Annex II - Tree Treatment Schedule**. A **Photographic Record of Existing Trees** is enclosed in **Annex IV.**

Table A2.1 Summary of Existing Tree Species

Botanical Name	Chinese Name	No. of Trees	%	Native (N)/ Exotic (E)
Artocarpus heterohpyllus	波蘿蜜	4	18%	E
Bauhinia variegata	宮粉羊蹄甲	7	31%	E
Eucalyptus torelliana	毛葉桉	1	4%	E
Leucaena leucocephala	銀合歡	6	26%	E
Macaranga tanarius var. tomentosa	血桐	3	13%	N
Mallotus paniculatus	白楸	1	4%	N
Sterculia lanceolata	假蘋婆	1	4%	N
Total		**23**	**100%**	

3.4 The average DBH of the surveyed trees is about 295mm, with average height of 8.3m and average crown spread of 6.4m which indicates their fast growing nature of weedy trees or fruit trees. **Figure A2.1 Existing Tree Size Distribution** below shows that about half of existing trees have a DBH less than 300mm which indicates that they are relatively young and are trees recently self-seeded in the area. The fruit tree/ weedy tree, such as *Artocarpus heterohpyllus* and *Leucaena leucocephala,* have larger DBH over 500mm regarding their fast growing nature. Given the dense growing condition, the average crown spread of the plantation species on slope is relatively small while their tree growth is constrained by adjacent trees, low live crown ratio and “lion tail”/ “poor taper” are common evidence observed on these trees.

slope, given that the proposed scheme has been maximised the tree preservation opportunities.

Tree Felling

3.4 The site is vacant for years, there is no tree (base level) exactly located within the site. However, there are 3 nos. of existing trees A149, A150 and A162 which located on/very close to the site boundary, and which have been contained in the previous and the recent tree survey. The main trunk of these existing trees and majority of their crown spread are seriously leaning into the site, which are inevitably affected by the roadworks or site formation works for proposed boundary wall/ retaining wall and/or periphery drainage system which are required by the proposed development. Besides, another 20 trees (including Trees A136 and A147) are observed along the existing track connecting San Shek Wan Road and the site which will be affected by the proposed EVA/new access road to the site.

4.3 Having considered the tree species, which are weedy trees, poor condition of these affected trees, trees have unrecoverable defects, the affected trees are not suitable candidate for tree transplanting, and therefore tree felling is recommended.

4.4 According to the tree survey findings, unrecoverable defects are frequently found in the majority of existing trees. Defects include seriously leaning, epicormic sprouts, unbalanced crown/form, exposed and restricted rooting area that are unfavourable and not recommended to be retained. The proposal concludes that 17 trees are required of tree felling plus the removal of 6 weedy trees, *Leucaena leucocephala.*

4.5 The removal of trees will be compensated and replaced by high quality broadleaf/evergreen/ornamental trees and suitable greening treatment in proposed development by maximising the landscape and greening opportunities. Upon full establishment of proposed planting, the local landscape context will be enhanced.

5.0 New Tree Planting Concept

5.1 As described above, the loss of existing trees will be replaced by broadleaf/evergreen/ ornamental trees creating a good quality residential landscape that would enhance the visual amenity of the local context, benefiting both the future residents, pedestrians and their neighbourhoods. The New Tree Planting Concept is presented in **Appendix V**. The planting proposal has sought to:

- Provide physical and visual integration with the surrounding neighbourhoods.
- Provide screening of the built-form and softening the development edge.
- Provide quality and sustainable residential environment for the future residents.
- Provide compensation for felling of existing trees.
- Maximise opportunities for the planting of new tree as well as other forms of greening measures; and
- Using native or locally adopted trees and shrubs to fill in planting areas would improve biodiversity and ecological health, creates a more harmonious aesthetic with the surrounding landscape.

5.2 The planting proposal provides a green environment, good quality communal spaces, and good quality planting establishment for the proposed development. A total of 17 new trees will be planted within the site for compensate the tree loss with excluding the removal of 6 nos. of *Leucaena leucocephala*. A replanting ratio in term of quantity of minimum 1:1 would be achieved (17 trees felled: 17 new planted). Heavy standard size tree stock will be utilised to create an instant greening effect. This proposal has been maximised the opportunity of greening within the development.

5.4 The selection of good quality species will enhance the local landscape context upon full establishment. These trees form part of the overall landscape design proposal which will be further developed during the detailed design stage of the project. A summary of the new tree planting proposal is provided in **Table A5.1** below.

Table A5.1 Tree Planting Mix

Botanical Name	Heavy Standard Tree Size for reference only DBH (mm) x Height (mm) x Spread (mm)	Spacing (mm)	Indicative number of tree to be planted
Tree			
**Bischofia javanica*	100 x 5500 x 4000	5000	13
Osmanthus fragrans	100 x 4000 x 3500	4000	4

Note:* denotes native tree species.

5.5 Trees with Heavy Standard are defined as follow:

Heavy Standard:

- A sturdy straight stem at least 2000mm high from the root collar to the lowest branch;
- Total height above the root collar exceeding 3500mm but not exceeding 6000mm;
- Stem diameter exceeding 75mm but not exceeding 150mm measured at a height of 1300mm from the root collar;
- According to the species, either a well-balanced branching head, or a well-defined straight and upright leader with branches growing out from the stem with good symmetry, and a minimum length of 800mm;
- A rootball not less than 750mm in diameter and 400mm in depth;
- Grown in a container not less than 750mm in diameter and 600mm in depth; and
- Free from any kind of pest, fungi, disease and parasitic plants.

5.6 The height of all trees shall be measured above the root collar, and the diameter of all stems to be measured at a height of 1300m above ground level.

6.0 Conclusion

6.2 The site is vacant. Refers to the recent topographical survey update of existing tree location, there is no tree (base level) exactly located within the site. However, there are 3 nos. of existing trees, A149, A150 and A162 which located on/very close to the site boundary, and which have been contained in the previous and the recent tree survey. The main trunk of these existing trees and majority of their crown spread is seriously leaning into the site, which will be affected by the roadworks or site formation works for proposed boundary wall/ retaining wall and/or periphery drainage system which are required by the proposed development. Besides, another 20 trees (including Tree A136 and A147) are observed along the existing track connecting San Shek Wan Road and the site which will be affected by the proposed EVA/new access road to the site.

6.3 No rare or protected tree species (Cap 96 refers) is found to exist in the site. No registered Old and Valuable Trees (DEVB TC(W) No. 5/2020 Registration of Old and Valuable Trees, and Guidelines for their Preservation) is found in the survey.

6.4 Having considered the retention of exiting trees surrounding the site, the access road alignment, the boundary wall/ retaining wall treatment and drainage proposal, have been carefully planned to minimise the effect on the existing trees in particular those on vegetated slope, given that the proposed scheme has been maximised the tree preservation opportunities.

6.5 Having considered the tree species, which are weedy trees, poor condition of these affected trees, trees have unrecoverable defects, the affected trees are not suitable candidate for tree transplanting, and therefore tree felling is recommended. According to the tree survey findings, unrecoverable defects are frequently found in many existing trees. Defects include seriously leaning, epicormic sprouts, unbalanced crown/form, exposed and restricted rooting