

5 August 2025

The Secretary
Town Planning Board
c/o Planning Department
15/F North Point Government Offices
333 Java Road, Hong Kong

By Hand and Email

Dear Sir

Section 16 Planning Application for Proposed Social Welfare Facility (Residential Care Home for the Elderly), Shop and Services (Medical Clinic and Consulting Room) and Public Vehicle Park (Private Car Only) in "Village Type Development" Zone at Lots 76 S.G (Part), 76 S.H (Part) in D.D. 101 and adjoining Government Land, Mai Po, Yuen Long (Application No. A/YL-MP/384)

Reference is made to the captioned application submitted to the Town Planning Board (the Board) on 19 December 2024, the Further Information submitted on 10 April 2025, 18 June 2025 and the recent departmental comments received in July 2025 and August 2025. In responses to the departmental comments, enclosed please find the Further Information for consideration. In particular, the Application would like to clarify a few particular issues as below. For details, please refer to the enclosed responses-to-comments table and its supporting attachments.

- To address concerns from Agriculture, Fisheries and Conservation Department (AFCD), the Applicant has slightly elaborated the wetland and visual buffer by incorporating a landscape pond with native wetland planting;
- Regarding the ancillary facilities, including the canteen and café, they are intended for the use of the staff and visitors of the private RCHE only. The proposed Shop and Services should only refer to the proposed Medical Clinic and Consulting Room. To avoid confusion, the Development Schedule and annotations on the MLP and floor plans are updated correspondingly; and
- In response to comments from Landscape Unit of UD&L/PlanD, the tree planting proposal has been slightly refined to ensure adequate growing space. To enhance the landscape quality and to mitigate against any potential impact to the surroundings, it should be reiterated that all new tree planting will be heavy standard trees and the compensation ratio to the tree lost in term of quantity is up to 1:3.8.

Thank you for your kind attention. Should there be any queries, please do not hesitate to contact the undersigned at [REDACTED] / Mr Edison Law at [REDACTED]

Yours faithfully
for Llewelyn-Davies Hong Kong Ltd



Man Ho
Associate Director

MH/el
Encl.

cc (w/ encl.)
DPO/FS&YLE

Attn: Mr Kimson Chiu / Ms Jessie Lau

(by email)

Section 16 Planning Application for Proposed Social Welfare Facility (Residential Care Home for the Elderly), Shop and Services (Medical Consulting Room including Clinic) and Public Vehicle Park (Private Car Only) in "Village Type Development" Zone at Lots 76 S.G (Part), 76 S.H (Part) in D.D. 101 and adjoining Government Land, Mai Po, Yuen Long

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List of Attachments

- Attachment A – Updated Scheme and Supporting Drawings
- Attachment B – Revised Ecological Impact Assessment
- Attachment C – Revised Environmental Assessment
- Attachment D – Revised Traffic Impact Assessment
- Attachment E – Revised Landscape Proposal and Tree Treatment Proposal
- Attachment F – Illustrative Drawings for RCHE-related Uses
- Attachment G – Revised Drainage Impact Assessment
- Attachment H – Revised Sewerage Impact Assessment

	Departmental Comments	Responses to Comments
1.	Comments of Agriculture, Fisheries and Conservation Department received on 11.7.2025	
1.1	<p>RtC 1.1.2, S.6.3.6-6.3.10</p> <p>According to TPB PG no. 12C, for those disturbed areas directly abutting the WCA, the development should provide a wetland and visual buffer to separate the development from the WCA to minimize its impact on the wetland and to restore some of the lost fish ponds to an appropriate form of wetland adjoining the WCA. In the subject application, the northwestern edge of application site is directly abutting the WCA. Although the northeastern edge is not directly abutting the WCA, it is only about one to several metres away from the WCA separated by the WBA. Two rows of tree planting are proposed along the northwestern edge of application site while one row of tree planting and grasscrete area are proposed along the northeastern edge. Please advise how the above proposed landscape area of about 10m width could comply with the requirement of wetland and visual buffer under TPB PG no. 12C.</p>	<p>The requirements of TPB PG-No. 12C mandate that developments directly adjacent to the Wetland Conservation Area provide a wetland and visual buffer. In this case, only part of the northwestern boundary of the Application Site directly abuts the WCA (with a short section of about 45m in length). This proximity necessitates a buffer to minimize ecological impacts, as outlined in the guidelines, ensuring the protection of the Deep Bay wetland ecosystem. In our previous submitted proposal, two rows of tree plantings have been proposed along this northwestern boundary of the Application Site.</p> <p>While only the short section (about 45m in length) of northwestern boundary directly abuts the WCA, we note AFCD's comments on the northeastern boundary, which is about a few meters away from the WCA separated by a strip of Wetland Buffer Area. To further demonstrate the Applicant's conservation efforts, we now newly propose a belt of wetland and visual buffer along both the northeastern to the northwestern edge. It provides a buffer distance of about 12m to 25m from the nearest wetland habitats (i.e. two abandoned ponds with very low ecological value) to the proposed low to mid-rise Residential Care Homes for the Elderly. The overall length of the wetland and visual buffer has also been extended to approximately 100 meters, which is 2 times more than the approximate length (about 45m) that the Application Site directly abuts the WCA. In particular, a landscape pond with native wetland planting has been introduced. It would further promote the ecological values by provision of ecological resources for birds, dragonflies and butterflies.</p> <p>Overall, the wetland and visual buffer will further distance the development from nearby wetland habitats, and the operation of the proposed development will remove the original degraded use of open storage and enhance the overall ecological and rural character in line with the intent of TPB PG-No. 12C. Sections 6.3.6 to 6.3.11, Figure 6.4, Figure 6.4a and Figure 6.4b are revised accordingly (see Attachment B – Revised EcolA).</p>

	Departmental Comments	Responses to Comments																																																															
1.2	<p>RtC1.1.4</p> <p>Our previous comment has not been addressed. Please provide the requested information using the following table.</p> <table><tr><th>Approximate heights(h) of flights</th><th>Flight Line A</th><th>Flight Line B</th><th>Flight Line C</th><th>Flight Line D</th><th>Flight Line E</th><th>Flight Line F</th><th>Flight Line G</th><th>All recorded flights</th></tr><tr><td>5m - 10m</td><td></td><td></td><td></td><td></td><td></td><td></td><td></td><td>1%</td></tr><tr><td>10m - 15m</td><td></td><td></td><td></td><td></td><td></td><td></td><td></td><td>72%</td></tr><tr><td>15m - 20m</td><td></td><td></td><td></td><td></td><td></td><td></td><td></td><td>19%</td></tr><tr><td>20m - 25m</td><td></td><td></td><td></td><td></td><td></td><td></td><td></td><td>6%</td></tr><tr><td>25m - 30m</td><td></td><td></td><td></td><td></td><td></td><td></td><td></td><td>2%</td></tr><tr><td>30m < h</td><td></td><td></td><td></td><td></td><td></td><td></td><td></td><td>1%</td></tr></table>	Approximate heights(h) of flights	Flight Line A	Flight Line B	Flight Line C	Flight Line D	Flight Line E	Flight Line F	Flight Line G	All recorded flights	5m - 10m								1%	10m - 15m								72%	15m - 20m								19%	20m - 25m								6%	25m - 30m								2%	30m < h								1%	<p>The requested information is supplemented in Appendix C2 for details, with the integration of information provided in the original Table 4.3 and Table 4.4 of the previous version (see Attachment B – Revised EcolA).</p>
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1.3	<p>S.5.1.1, first 2 bullets</p> <p>Please specify that the max height refers to the facilities atop the roof floor.</p>	<p>Please note that the Applicant has refined the height of the roof top structures as per comments from Planning Department (Items 6.1 of this RtoC refers). The height and extent of roof-top structures are now significantly reduced, which only minor portion atop the roof floor will be used as MEP and lift provisions. Please see updated plans at Attachment A – Updated Scheme and Supporting Drawings. S.5.1.1 of the EcolA has also been updated accordingly.</p>																																																															
1.4	<p>S.5.3.9, S.6.3.1</p> <p>Please clarify the percentage of flights at 15m or above within the Ardeid Flight Zone.</p>	<p>The percentage of flights are supplemented in Sections 5.3.9 and 6.3.1 (see Attachment B – Revised EcolA). The majority of flights within the identified Ardeid Flight Zone, approximately 98%, were observed at heights exceeding 10 meters and climbed to the major heights of 15m or above, and about 24% of the flights were observed at height exceeding 15 meters and climbed to the major heights of 20m or above after taking off, that are all well above the heights of the main roofs (about 10m) of the proposed low-rise buildings T2 and T3.</p>																																																															
1.5	<p>S.5.3.10</p> <p>Please provide a figure to illustrate the positioning of the facilities situated atop the residential floors of T2 and T3 which can preserve roof area and thus flightlines.</p>	<p>Figure 5.4 is provided with the illustration of the positioning of the MEP facilities atop the low-rise buildings T2 and T3, to avoid overlap with the recorded flightlines (see Attachment B – Revised EcolA).</p>																																																															

	Departmental Comments	Responses to Comments
1.6	Section 5.3.25, S.6.2.3, Fig 6.4 Landscape Master Plan T21 is also used by breeding ardeids of the Mai Po Village Egrettry this year (i.e. 2025), and it should be retained.	Noted. T21 was revised to be retain. The tree assessment schedule, tree photos, relevant drawings and texts of the Landscape Report were updated (see Attachment E – Revised Landscape Proposal and Tree Treatment Proposal). Section 5.3.25, 6.2.3 and Figure 6.4 of the EcolA are also revised accordingly (see Attachment B – Revised EcolA).
1.7	It is stated that the proposed development consists of 2 or 3 nos. of 10-storey or 9-storey buildings in other technical assessments e.g. Landscape Proposal & Tree Treatment Proposal. Please clarify and revise for consistency.	Noted. Para. 1.3 of the Landscape Report has been updated (see Attachment E – Revised Landscape Proposal and Tree Treatment Proposal).
1.8	<u>Section 7.1.8</u> Please revise the Section to read: "...host a rich diversity of migratory and overwintering waterbirds, as well as serve as foraging sites for the ardeids at the Mai Po Village Egrettry. The ecological surveys conducted in the EIA study and the current application indicate that the three two abandoned ponds within the SPS WCP that are directly adjacent to the Application Site, close to developed areas and roads, host relatively lower abundance and usage of these birds, with no species of conservation importance recorded under the EIA Study, and low abundance of common species (Chinese Pond Heron and Little Grebe) recorded during the ecological survey under the current application. Construction impacts on the core conservation sites including the SPS WCP are assessed to be minor, provided mitigation measures are in place. To minimize impacts on overwintering bird populations, construction activities, such as piling, will be strategically scheduled in late mornings to early afternoons during the dry season, avoiding critical foraging and roosting times. During operation phase, with measures such as landscape planting around the edges of the Application Site, avoiding orientating any external flood light towards the wetlands in the Wetland Conservation Area, installation of internal blinds, shades and window shade, and consideration of aesthetic preferences where feasible in place, the impacts to the SPS WCP are considered to be minor. This comprehensive planning approach, paired with ongoing monitoring, ensures minimal cumulative impacts on the SPS WCP."	Noted, Section 7.1.8 is revised accordingly (see Attachment B – Revised EcolA).

	Departmental Comments	Responses to Comments
1.9	We defer to CEDD and/or other Department(s) to comment on the interface issue between the SPS WCP and the proposed development from technical perspectives.	Noted.
2.	Comments of Drainage Services Department received on 15.7.2025	
	<u>Drainage Impact Assessment</u>	
2.1	Figure 2: Please also demarcate the natural flow direction for the land parcel at south of the proposed site and at west of the Catchment A to confirm that it should not form part of the catchment being assessed.	Figures 2 of the DIA has been revised accordingly (see Attachment G – Revised DIA).
2.2	Appendix A: A mere landscape plan was provided in Appendix A without labeling the respective paved or unpaved area. Please provide a clear plan showing the paved and unpaved area statistics being adopted to justify the figures adopted in the calculation.	Appendix A of the DIA has been revised accordingly (see Attachment G – Revised DIA).
2.3	Appendix B: Please supplement the site condition at the downstream of SNF1002684. Please also provide hydraulic check to ensure that that existing stream would be adequate for the increased runoff due to the proposed development.	The condition at the downstream of SNF1002684 has been demonstrated in Appendix B-Figures 1,3 and 7, and S3.1.1 (see Attachment G – Revised DIA). For the 50-year return period rainfall event, the runoff from the Application Site decreases from 0.49 m ³ /s (pre-development) to 0.43 m ³ /s (post-development), due to increased unpaved areas and pond. The runoff drains to the upper reaches of the Mai Po Tributary under both pre- and post-development scenarios. Consequently, no hydraulic capacity check is required for the existing stream, as the development will not compromise its drainage capacity.
2.4	Appendix C: It would be odd to see that the 50-year runoff would change with given the same sub-catchment areas involved. The use of different times of concentration in evaluating the rainfall appears not appropriate. Please review the calculation.	Appendix C of the DIA has been revised accordingly (see Attachment G – Revised DIA). Time of concentration (tc) for the catchment of the Application Site is assumed to be 10.12min, which is consistent with the tc in the post-development scenario.

	Departmental Comments	Responses to Comments
3.	Comments of Environmental Protection Department received on 11.7.2025	
3.1	<p><u>Air Quality</u></p> <p>Table 2.3 and Section 2.3.2</p> <p>(a) Some prevailing AQO parameters (e.g. 24 hour NO₂, peak season O₃ and 24 hour CO) are missing in Table 2.3, please supplement. Also please update the contents in Section 2.3.2 accordingly.</p> <p>(b) Please note that the annual RSP concentrations in 2020 and 2021 (i.e. 30 µg/m³) should comply with the AQOs, their values should not be bolded in Table 2.3 and please revise Section 2.3.2.</p> <p>(c) Please revise "dust" in the 2nd last line to "air pollutant".</p>	<p>Monitoring data of these AQO parameters are added in Table 2.3. Relevant contents in Section 2.3.2 of the EA is also updated (see Attachment C – Revised EA).</p> <p>Annual RSP concentrations in 2020 and 2021 are unbolded and section 2.3.2 of the EA is revised accordingly (see Attachment C – Revised EA).</p> <p>Section 2.3.2 of the EA is revised accordingly (see Attachment C – Revised EA).</p>
3.2	<p>Section 2.5.1</p> <p>(a) Please add "regulations and" before "guidelines" in line 6.</p> <p>(b) Please advise supplement the construction details (e.g. estimated size of site formation, amount of excavated materials, size of active workfront area, no. of construction vehicles and PME to be used at a time, etc.) as appropriate and revise "later stages" in the 2nd last line of Section 2.5.1, line 8 of Section 2.5.2 and lines 14-15 of Section 2.5.3 accordingly.</p>	<p>Section 2.5.1 of the EA is revised accordingly (see Attachment C – Revised EA).</p> <p>The exact scale of such construction activities (i.e. estimated size of site formation and size of active workfront area) and number of machineries (i.e. no. of construction vehicles and PME to be used at a time, etc.) can only be determined in later detailed design stage. "later stage" is revised to "later detailed design stage" for better clarity in Sections 2.5.1, 2.5.2 and 2.5.3 of the EA (see Attachment C – Revised EA).</p>
3.3	<p>Section 2.6.3: Based on the desktop review, there is a road adjacent to the northeast of the project site (near Hop Shing Wai), please advise if it will exist at the operational phase and its air quality impact should be assessed.</p>	<p>Kindly be clarified that the concerned access is not a proper road, which also falls within the Application Site. This access will no longer exist at the operational phase of the proposed development and does not have any air quality impact.</p>

	Departmental Comments	Responses to Comments
3.4	Section 2.6.4: Re. R-t-C #3.7, please supplement TD's endorsement on the road type of Tam Kon Chau Road.	Tam Kon Chau Road can be considered as a Local Distributor road. TD's endorsement is provided in Appendix 2.1 of the EA (see Attachment C – Revised EA).
3.5	Section 2.6.6: The existing/planned odour source within the <u>500m</u> assessment area should be considered. Based on the preliminary review, San Tin Lok Ma Chau Effluent Polishing Plant will be located within the 500m from the project site. Please review and update the findings.	The 500m assessment area has been considered, Section 2.6.6 and 2.6.7 of the EA are revised accordingly (see Attachment C – Revised EA). As planned odour source, San Tin Lok Ma Chau Effluent Polishing Plant (EPP), is identified within 500m assessment area. Since it is situated outside the 200m buffer distance as recommended in Chapter 9 in HKPSG, no adverse odour impact on any nearby ASRS including the Proposed Development is anticipated from the EPP.
3.6	Sections 2.6.8, 2.6.10 and 2.8.2: Please explore if the deodorizer with higher odour removal efficiency (e.g. 99% or above for H2S) will be available.	The quoted 95% odour removal efficiency is based on the referenced study report as a minimum requirement. Since it is still early planning stage, if necessary, availability for installation of deodorizer with higher odour removal efficiency can be reviewed at later detailed design stage. Text added in Section 2.6.10 of the EA (see Attachment C – Revised EA). The Applicant has also no objection for stipulation of relevant planning approval conditions accordingly.
3.7	Section 2.7.1: Exempted NRMM shall be avoided, please delete "as far as practicable" in the 1st bullet. Also please consider if electrified NRMM will be used as far as practicable.	Section 2.7.1 of the EA is revised accordingly (see Attachment C – Revised EA).
3.8	Figure 2.1: Please correct the typo "Noise Sensitive Receiver" in the Legend to "Air Sensitive Receiver".	Figure 2.1 of the EA has been rectified accordingly (see Attachment C – Revised EA).
3.9	Figures 2.3 and 2.6: The existing/planned chimney/industrial and odour emission source within the 500m assessment area should be considered, please consider to combine two figures for clear presentation.	Figures 2.3 and 2.6 are now combined into Figure 2.3 for clarity (see Attachment C – Revised EA).

	Departmental Comments	Responses to Comments
	<u>Water Quality</u>	
3.10	S.5.1.2 and S.5.5.8: To avoid confusion, please revised "in a separate SIA report prepared by others" to "in a separate SIA report prepared by the applicant ".	Section 5.1.2 and 5.5.8 of the EA has been revised accordingly (see Attachment C – Revised EA).
3.11	S.5.5.8: Please include the water quality treatment standards and requirements in a table form. Please provide brief description on the adoption of such standards and requirements.	The water quality treatment standards is added as Table 5.2. Brief description on the adoption of such standard and requirements is also added as a remark (see Attachment C – Revised EA).
3.12	S.5.5.8: On the proposed on-site STP, please specify that the license under Cap. 358 Water Pollution Control Ordinance (WPCO) for discharging the treated effluent to public stormwater/drainage system will be applied. The operation of the Project shall comply with the requirement of the licence under WPCO. Any monitoring requirement of the licence under WPCO shall be complied with.	The statement is specified in S5.5.8 of the EA (see Attachment C – Revised EA).
	<u>Waste management and land contamination</u>	
3.13	Table 6.1 – The sentence of Remarks* is unclear and confusing. Please revise the sentence for better clarity.	Estimated quantity of C&D materials from site clearance is based on estimation of removal of top 300mm of the ground, in which the top 300mm of ground includes soil, vegetation and concrete. Table 6.1 of the EA is revised accordingly (see Attachment C – Revised EA).
3.14	Table 6.2 – Please clarify the roles of the "on-site workers", as they were not mentioned in the previous report.	Other on-site workers refer to other staff/ workers working at the RCHE facilities e.g. shops, operation staff. To avoid confusion, this is now collectively named as 'Staff of the RCHE' in Table 6.2 of the EA Table 6.1 of the EA is revised accordingly.
3.15	Section 7.3.2 – Please ensure the font type is consistent throughout the paragraph.	Section 7.3.2 of the EA is revised accordingly Table 6.1 of the EA is revised accordingly.
	<u>Sewerage Impact Assessment</u>	
3.16	Section 4.2 – Please revise "on-site sewerage treatment plant" as "on-site sewage treatment plant".	Section 4.2 of the SIA has been revised accordingly (see Attachment H – Revised SIA).

	Departmental Comments	Responses to Comments
3.17	Heading of Section 6 – Please revise as "On-site sewage treatment plant".	Section 6 of the SIA has been revised accordingly (see Attachment H – Revised SIA).
3.18	Section 9.1 – Please review the second sentence which is not applicable to the application.	Section 9.1 of the SIA has been revised accordingly (see Attachment H – Revised SIA).
3.19	<p>Having reviewed the draft FI provided, please note that we have no further comment on the revised EA and SIA. Following suggestions on air quality are minor textual in nature:</p> <ul style="list-style-type: none"> Section 2.6.3: Please move "The existing access to the northeast of the Application Site is temporary and will no longer exist at the operation phase." in lines 9-10 after the 1st sentence in line 3 for clarity. Section 2.6.7: Please delete "any nearby ASRS including" in line 8. Figure 2.5: Please indicate in the figure/title the elevation of exhaust location for the proposed on-site STP (e.g. G/F). We wish to reiterate our comment on 15 May 2025 that the applicant is required to submit a proper Noise Impact Assessment and the implementation of mitigation measures identified therein under an Approval Condition to the satisfaction of the DEP or the TPB, allowing for the review, exploration, demonstration and implementation of appropriate noise mitigation measures to ensure full compliance with the relevant noise criteria and requirements under ProPECC PNs, HKPSG and NCO during the operational phase of the proposed development. In addition and for sewerage, an updated SIA should be submitted by the applicant under an Approval Condition to the satisfaction of the DEP or the TPB to assess the potential sewerage impact with the detailed design scheme of the on-site sewage treatment plant and ensure such implementation is required. Please provide a full set of revised EA and SIA for record. 	<p>Please see Attachment C – Revised EA.</p> <p>Please see Attachment C – Revised EA.</p> <p>Please see Attachment C – Revised EA.</p> <p>Noted.</p> <p>Please see Attachment C – Revised EA and Attachment H – Revised SIA.</p>

	Departmental Comments	Responses to Comments
4.	Comments of Social Welfare Department received on 14.7.2025	
4.1	<p>This planning application is submitted to seek permission for the following three items included in the proposed development –</p> <ol style="list-style-type: none"> 1. Proposed social welfare facility (RCHE), 2. Shop and services (medical consulting room including clinic), and 3. Public vehicle park uses (private cars only). 	Noted.
4.2	<p>To clarify, the Social Welfare Department (SWD) is to provide comments on item 1 “proposed social welfare facility (RCHE)” from social welfare point of view. SWD considers that item 2 “shop and services (medical consulting room including clinic)” and item 3 “public vehicle park (private cars only)” should not be regarded as parts of the RCHE although these facilities may serve some residents, staff or visitors of the proposed RCHE and that applicant has replied that the Developer will be responsible for future management and maintenance of the private RCHE including its ancillary car park upon operation.</p>	<p>Noted. For clarity sake, a set of illustrative drawings is now enclosed in Attachment F – Illustrative Drawings of RCHE-Related Uses for SWD’s reference. Different graphical presentation is adopted to differentiate the RCHE-related uses and other non-RCHE related uses.</p> <p>It should be highlighted that this set of drawings is only for illustrative and reference only. The detailed design will be subject to review at subsequent stages.</p>
4.3	<ol style="list-style-type: none"> 1. Proposed social welfare facility (RCHE) From social welfare point of view, the basic and exclusive facilities of an RCHE including bedroom, sitting/dining room, toilet/bathroom/shower room, kitchen, laundry, office and isolation facility / room are parts of RCHE. The facilities of an RCHE should be solely and exclusively used by residents of the RCHE. 	Noted.
4.4	<ol style="list-style-type: none"> 2. Shop and services (medical consulting room including clinic) On the revised drawing in Appendix G, it is noted that the clinic (including general office, reception, CT room, PT/OT room, and 6 consulting rooms for clinic use) on 8/F and all shops and services (such as daily provision outlet, cafe, restaurant, kitchen and shop, etc.) on G/F and health care wellness centre on 1/F are highlighted by the applicant as RCHE facilities. 	<p>Noted. Intended non-RCHE related uses are indicative clearly on plan, such as medical consulting room including clinic at 8/F and the Healthcare / Wellness Centre and etc. located on G/F, 1/F and 2/F respectively. Please refer to Attachment F – Illustrative Drawings of RCHE-Related Uses for reference.</p> <p>It should be highlighted that this set of drawings is only for illustrative and reference only. The detailed design will be subject to review at subsequent stages.</p>

	Departmental Comments	Responses to Comments
	<p>a. Medical consulting room including clinic Based on the information provided in the application for permission under section 16 of the Town Planning Ordinance (Cap.131) ("S16 application form"), the proposed use(s)/development listed under non-domestic part includes uses of shop and services (medical consulting room including clinic). The uses for "medical consulting room" including clinic is separated from RCHE and that areas for "shop and services and other purposes" are separately listed. From social welfare point of view, "shop and services (medical consulting rooms including clinic)" are not facilities of RCHE. The design, planning and regulatory control of the medical consulting room including clinic proposed in this site are beyond the ambit of SWD. In this regard, SWD is not in position to provide comments on item 2 "shops and services (medical consulting room including clinic)"</p> <p>b. Other provisions There are other provisions of shop and services such as daily provision outlet, cafe, restaurant, kitchen and shop, etc. on G/F and health care wellness centre on 1/F. As the applicant mentioned before, these facilities would be open to staff and other visitors and potentially for other purposes, like training site for non-local health care talents instead of exclusively used by RCHE, they should not be counted in the area of RCHE.</p>	

	Departmental Comments	Responses to Comments															
4.5	<p>3. Public vehicle park uses</p> <p>There is provision of public and private car parking on B/F, and the Proposed Parking and Servicing Provision includes the following –</p> <table border="1"> <thead> <tr> <th>Servicing Provision</th><th>No. of Parking Spaces</th><th>Proposed Provision</th></tr> </thead> <tbody> <tr> <td>a. Private Car Parking for RCHE</td><td>48</td><td>48 private car parking spaces was proposed for RCHE.</td></tr> <tr> <td>b. Clinic</td><td>9</td><td>Provision of 9 parking spaces was proposed based on requirement as per HKPSG for clinics.</td></tr> <tr> <td>c. Public Vehicle Park</td><td>19</td><td>A Public Vehicle Park (for private cars only) with 19 parking spaces was proposed at the basement level to serve the potential tourists that visit the area.</td></tr> <tr> <td>Total No. of Car Parking Spaces</td><td>76</td><td></td></tr> </tbody> </table>	Servicing Provision	No. of Parking Spaces	Proposed Provision	a. Private Car Parking for RCHE	48	48 private car parking spaces was proposed for RCHE.	b. Clinic	9	Provision of 9 parking spaces was proposed based on requirement as per HKPSG for clinics.	c. Public Vehicle Park	19	A Public Vehicle Park (for private cars only) with 19 parking spaces was proposed at the basement level to serve the potential tourists that visit the area.	Total No. of Car Parking Spaces	76		Noted.
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Total No. of Car Parking Spaces	76																
4.6	Re previous responses of 4.1: (a) Private car parking is not supported as part of RCHE. The proposed 48 private car parking spaces for RCHE are therefore not regarded as facilities of the RCHE while the developer intends to design these provisions for other person's in-need.	Noted. The provision of car parking is required to satisfy also TD's requirements on car parking provisions.															
4.7	The proposed parking spaces for (b) Clinic and (c) Public Vehicle Park are beyond the ambit of SWD.	Noted.															
4.8	Re 4.2, 4.3 and the revised drawings in Appendix G On the understanding that the red dotted lines represent the boundary of the proposed development , and that the indicative Master Layout Plan (see Appendix G) serves the purpose of the subject S16 planning application only. However, the area of RCHE is different from the area of the proposed development .	Noted.															

	Departmental Comments	Responses to Comments
4.9	<p>Colouring of areas facilitates SWD to comment on the RCHE-related facilities and differentiate RCHE-related areas from other non-related areas that may serve as community facility instead of social welfare facility. The applicant is suggested to review the design or revise the demarcation of areas for the RCHE. If the applicant intends to keep non-RCHE related facilities in the proposal, please state clearly for differentiation and may add other indications in the legend. For example, RCHE General Office on 2/F is being agreed as a basic facility in the proposed RCHE; yet General Office on G/F appears not designed exclusively for RCHE use and shall not be demarcated in blue. While the current design of the proposed RCHE is considered at an initial stage, the applicant is required to make necessary changes/adjustments on its submitted design drawings so as to address the concerns of SWD. For clarity's sake, the applicant should add 'RCHE' before the name of room/facility (e.g. RCHE kitchen) if such room/facility is for exclusive use of RCHE residents.</p> <p><u>Comments received on 31 July 2025</u></p>	<p>Noted. Intended non-RCHE related uses are indicative clearly on plan, such as medical consulting room including clinic at 8/F and the Healthcare / Wellness Centre and etc. located on G/F, 1/F and 2/F respectively. Please refer to Attachment F – Illustrative Drawings of RCHE-Related Uses for reference.</p> <p>It should be highlighted that this set of drawings is only for illustrative and reference only. The detailed design will be subject to review at subsequent stages.</p>
4.10	At this planning stage while the detailed design and some basic facilities are not shown on the revised drawings, the applicant should note that the RCHE shall be in full compliance with the prevailing statutory and licensing requirements, for a RCHE licence to be issued.	Noted.
4.11	As the plans of RCHE is revised, there would be subsequent changes in the original PR of about 1.89 and the GFA of about 15 896 sq m for the RCHE.	There is no change of the overall proposed development parameters of the Proposed Development under the subject S16 planning application. The wordings of the Development Schedule is updated to avoid confusion and to serve the subject planning application purpose (see Updated Development Schedule in Attachment A).
4.12	Overall speaking, the basic design of the RCHE is separated into two towers (Tower 1 and 2) and the other tower in the middle has become a non-RCHE portion as shown on the revised drawings. Daily management and operation of the RCHE may be difficult under such design.	As demonstrated in the illustrative drawings, the 3 blocks are easily and conveniently connected with each other by the well-designed circulation space and circulation footbridges via the tower in the middle at G/F, 2/F and 3/F. The future private operator will ensure efficient operation of the privately-run RCHE with her own series of management measures, which include but not limited to gate house, registration system, access cards and etc.

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	Departmental Comments	Responses to Comments
	<u>Comments received on 1 Aug 2025</u>	
4.13	We noted that Table 3.1 "Major Development Parameters of the Proposed Scheme" is updated to address SWD's comments.	Noted.
4.14	In view that the RCHE does not include shop and services, medical consulting room, clinic or ancillary uses such as ancillary shop, canteen, restaurant, office, laundry, and healthcare/wellness centre which are not exclusively used by the residents of the RCHE, the GFA of these ancillary facilities shall be excluded from the GFA of the RCHE.	Noted that SWD's comments were made from social welfare perspective.
4.15	Under this development proposal, only the RCHE is regarded as Social Welfare Facility.	Noted that SWD's comments were made from social welfare perspective.
4.16	We noted that there will be NIL Private Car Parking for RCHE.	Noted that SWD's comments were made from social welfare perspective.
4.17	Based on all comments from SWD, we have no objection to the application as the proposed private/self-financing RCHE could serve to provide the elderly with residential care needs in the district with more choices in the market.	Noted.

	Departmental Comments	Responses to Comments
5.	Comments of Transport Department received on 15.7.2025	
5.1	Table 3.3: Please consider to provide bicycle parking spaces with reference to Guideline of Provision of Bicycle Parking Space in Annex B of Checklist of Traffic Impact Assessment for development Projects published in TD website below https://www.td.gov.hk/en/publications_and_press_releases/publications/free_publications/index_categoryid_8.html?print=1	Noted. Please refer to Table 3.3 of the revised TIA (see Attachment D – Revised TIA).
5.2	Section 4.2.2: Please state the number of parking spaces provided in the existing car park.	Please note that the existing car park mentioned in the previous TIA report is referring to the one situated to the north of the site, which does not belong to the subject Application Site. To avoid confusion, the related section has been deleted in the revised TIA report (see Attachment D – Revised TIA).
5.3	Table 4.9: In remark (3), it is noted that the trip rate of Jumbo Court is adopted. Please clarify why the trip rate of the existing car park at the application site is not adopted.	Jumbo Court is a public car park near the RCHE in Wong Chuk Hang, and its trip rate is more suitable for the proposed development. As mentioned in the responses for item 5.2 above, the "existing car park" does not belong to the site, and includes parking spaces for large goods vehicles.
5.4	Section 4.2.9: Please add a drawing to show the net traffic flows generated/attracted by the proposed development.	Noted. Please refer to Drawings 4.2 of the revised TIA (see Attachment D – Revised TIA).
5.5	Section 5.1.1: Please conduct a sensitivity test to assess the traffic performance of relevant road and junction in a design year after the full population intake of San Tin Technopole to ensure that the proposed development would not affect the development potential of San Tin Technopole.	Noted. Please refer to the sensitivity test in Section 5.4 of the revised TIA (see Attachment D – Revised TIA).
5.6	Section 6.3.1: Please add a pedestrian crossing across Castle Peak Road at the north of the existing bus stops and about 100m north of the existing crossing to facilitate access of the southbound bus stop.	Noted. The mentioned pedestrian crossing has been included in Section 6.3.1 of the revised TIA (see Attachment D – Revised TIA).
5.7	Appendix A: Please check the junction calculation, particularly for the circle time adopted in new junction which should be limited to 90s under TPDM.	Noted. The circle time of the junctions has been revised (see Attachment D – Revised TIA).

	Departmental Comments	Responses to Comments
	<u>Comments received on 31 July 2025</u>	
5.8	Regarding the proposed pedestrian crossing across Castle Peak Road - Mai Po in Drawing No. 6.1, please consider to shift the proposed crossing slightly toward the south to maintain sufficient sight line to pedestrian for the road bend at the north.	Noted, Drawing 6.1 ha been revised accordingly.
5.9	Should there be any changes to the proposed road improvement works under San Tin Technopole project, the applicant shall propose and implement any necessary road improvement works to address the traffic and transport demands arising from the proposed development to the satisfaction of TD.	Noted. No objection for stipulation of approval conditions if necessary.
5.10	For junction calculation of Junction D, please note that Road D3 (SB) only consist of 3 traffic lanes while CPR westbound has 3 traffic lanes. Please review.	The layout and junction calculation of Junction D has been revised accordingly.
5.11	For junction calculation of Junction F & G, please review the number of available traffic lanes for slip roads with due consideration of the length of the flare lanes.	The layout and junction calculation of Junction F&G has been revised accordingly.

	Departmental Comments	Responses to Comments
6.	Comments of Urban Design and Landscape Section, Planning Department received on 15.7.2025	
6.1	Having reviewed the FI-2, it is noted that the landscape layout is revised and there is no change in the proposed tree treatment of the existing trees within application site boundary. Please find our comment from landscape planning perspective as follows:	Noted.
6.2	Table 8 (para. 3.6) – Noting the proposed compensatory tree species <i>Ficus microcarpa</i> (細葉榕) is large tree species with aggressive roots and extensive crown spread, the applicant should review the proposed species and reserve adequate growing space for healthy tree growth.	Noted. Root Barrier will be adopted in certain area to control the growth of the <i>Ficus microcarp</i> .
6.3	Noting some new trees will be planted <u>before</u> the removal of existing trees in the southeast of the site, the applicant is reminded to seek comments and approval from relevant government department before commencement of the tree works.	Noted and agreed.
6.4	It is noted from the R to C table (item 1.1.1) that the new tree planting issue in related to comment item (ii) above is proposed to address AFCD's comment from nature conservation perspective. The applicant is advised to seek AFCD's comment and incorporate relevant paragraph(s) to relevant technical assessment report(s).	Noted and the related paragraphs will be incorporated into Ecological Impact Assessment Report (see Attachment B – Revised EcolA).
6.5	<u>Comments received on 1 Aug 2025</u> Our previous comment via email dated 15/7/2025 is still valid. Considering <i>Ficus microcarpa</i> (細葉榕) is large tree species with aggressive roots and extensive crown spread. Given the inadequate growing space proposed, the species is considered not suitable. Further review on the proposed species is required.	Noted. With reference to AFCD's comments dated 12 May 2025, a mixing of <i>Dimocarpus longan</i> with <i>Ficus microcarpa</i> is recommend for the current egretries, especially MPV and MPLV. In view of it, we opine that <i>Ficus microcarpa</i> will be kept, but the spacing was increased from 5m to 8m to allow reasonable growing space. The original 12 nos. FM will be thus reduced to 7nos. in this updated Landscape Proposal. The compensation ratio to the tree lost in term of quantity was revised to 1:3.8, which is more than min. 1:1. (see Attachment E – Revised Landscape Proposal and Tree Treatment Proposal).

	Departmental Comments	Responses to Comments
7.	Comments of Fanling, Sheung Shui & Yuen Long East District Planning Office, Planning Department received in July 2025	
7.1	Please ensure the roof-top structure of the Proposed Development complies with the building height restriction as stipulated under Join Practice Note No. 5.	<p>The Applicant has thoroughly reviewed the extent and height of the supporting roof-top structures of the Proposed Development. The roof-top structures of T1 are now revised to be only 3m (which is not more than 10% of the absolute building height) and covers less than 50% of the roof area of the floor below. A tiny portion of structures with height of 5.2m is allowed for lift provisions at T1. For details please refer to Attachment A – Updated Scheme and Supporting Drawings.</p> <p>The Applicant would like to take this opportunity to reiterate that the subject Proposed Development is in line with the surrounding planning context.</p> <p>In planning terms, the surrounding planning context is being gradually transformed into a more urbanised context with the implementation of Northern Metropolis taken in place. In particular, with reference to the Strategic Feasibility Study on Development of Wetland Conservation Parks System under the Northern Metropolis Development Strategy recently published in October 2024, the Application Site is situated in a non-ecological sensitive periphery area outside the "Visitor Zone" of the Sham Po Shue Wetland Conservation Park. As such, the Proposed Development is considered compatible with the overall development context (see Illustrative Drawing A in Attachment A for reference).</p> <p>From design perspective, as mentioned in RtC Item 1.1 above, the Applicant has tried her best effort to further refine the Proposed Scheme to promote compatibility of the development proposal. Under the latest updated Proposed Scheme, the design of the belt of wetland and visual buffer along the northeastern and northwestern boundary has been revised, where a landscape pond with native wetland planting is now introduced to further promote the ecological values of the subject Proposed Scheme. The corresponding changes are reflected on the latest MLP as well as the Landscape Proposal accordingly (see Attachment E – Revised Landscape Proposal and Tree Treatment Proposal).</p>

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	Departmental Comments	Responses to Comments
		Together with the design and ecological commitments already made, such as incorporation of a Height Restriction Zone (with no buildings of not more than 15m) covering a significant portion of the Application Site, the current Proposed Scheme is considered well justified. For details, please refer to the Updated Figure 3.18 – Design Merits and Ecological Features in Attachment A .