Attachment 2

Responses to Comments Table

(Public Comments)

Responses to Public Comments

	Public Comments	Responses to Comments
	<u>No Supporting Transport Facilities</u>	
1.	The applicant has failed to commit, in their Traffic Review Report that exclusive shuttle bus services would be provided to support the operation of the Proposed RCHE.	The visitors of the Proposed RCHE would take private car, taxi, bus service (Route 76K) and GMB service (Route 73) to/ from the Proposed RCHE. In view of the scale of the Proposed RCHE (with only 90 beds), it would be impractical to provide exclusive shuttle bus service for the visitors.
2.	At least one L/UL bay will be designated for the Proposed RCHE as proposed by the applicant is considered insufficient. Relevant empirical data should be submitted by the applicant.	With reference to other RCHEs (even with more than 90 beds), only 1 L/UL is provided. In our case, even with the designated L/UL bay being occupied, the RCHE vehicle can also use the remaining 6 L/UL bays serving for the remaining retail use. In conclusion, the existing 7 L/UL bays provided for the existing Palm Springs Plaza should be sufficient to serve the Proposed RCHE and the remaining retail uses.
	<u>Inaccurate Data from Traffic Review Report</u>	
3.	Reference from the number of internal transport facilities of the existing Caritas Li Ka Shing Care and Attention Home in Tuen Mun is inappropriate due to different residential densities between Tuen Mun and Mai Po.	In general, the number of internal transport facilities provided should be related to the number of beds provided. For the existing Caritas Li Ka Shing Care and Attention Home, a total of 5 carparking spaces and 1 L/UL bay are provided. With the Proposed RCHE (with only 90 beds), the 33 carparking spaces and 1 L/UL bay should be sufficient to serve for the demand. Similarly, even with those facilities being occupied, the RCHE vehicles can also use the remaining 174 carparking spaces and 6 L/UL bays serving for the remaining retail use, In conclusion, the existing 207 carparking spaces and 7 L/UL bays provided for the existing Palm Springs Plaza should be sufficient to serve the Proposed RCHE and the remaining retail uses.

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4.	The calculation in trip generation is misleading, as there may also be trips generated by ambulances/rehab buses/medical transports/clinical waste disposal trucks which are different from types of vehicles relating to retail uses.	There are 137 of beds provided in the Golden Age Home for Senior citizens at Castle Paek Road – Tam Mi. The observed trip generation and the derived trip generation rate per bed have included all the observed RCHE vehicles (include trips generated by ambulances/rehab buses/medical transports/clinical waste disposal trucks).
	<u>Burden on the Existing Transport Infrastructure in Palm Springs</u>	
5.	Increased types of vehicles other than private cars / shuttle buses passing through the internal roads would cause adverse impact on the EVA.	As stated in the Traffic Review Report, the traffic generations under the Proposed Scenario (i.e., Proposed RCHE + 5,212.7 m^2 existing retail GFA) would generate the same traffic as the Existing Scenario. Hence the traffic impacts imposed on the internal roads under the Proposed Scenario is nil/minimal. Apart from that, the traffic flows on the internal roads are low and the traffic generated by the Proposed RCHE would not cause any adverse impact on the EVA.
6.	Increased number of visitors making use of the existing shuttle bus services intended exclusively for residents will lead to an abuse of the services by non-residents, and illegal sale of shuttle bus tickets.	Currently, the existing shuttle bus services serve only for the residents. The future visitors of the Proposed RCHE would take private car/ taxi/ bus/GMB and should not affect the existing operation of the shuttle bus services.
	<u>Noise Impact Review</u>	
7.	The NIR has used the centreline of the Palm springs boulevard to estimate its noise impact, which will underestimate the noise impact induced to the Proposed RCHE. As such, the Proposed RCHE might not be able to meet the 70db(A) road noise standard without any noise mitigation measures.	The assessment follows the methodology of Calculation of Road Traffic Noise, i.e. the noise source is 3.5m from the road kerb of the Palm Springs Boulevard.
8.	The traffic noise standard of the Proposed RCHE should be the same as the standard for hospital (i.e. 55db(A) at day-time and 45db(A) at night-time). The Proposed RCHE will not be able to meet such standard with its proximity to the visitor carpark and rooftop E&M facilities.	According to Table 4.1 Summary of Noise Standards of Chapter 9 of HKPSG, the traffic noise standard for **the diagnostic rooms or wards** of Residential Care homes for the Elderly (RCHE) is 55 dB(A). However, there are no diagnostic rooms or wards in the Proposed RCHE. Therefore, the 55 dB(A) noise standard is not applicable.

<table>
<tr><th></th><th>Public Comments</th><th>Responses to Comments</th></tr>
<tr><td>9.</td><td>The NIR lacks endorsement from the Transport Department on the methodology of traffic forecast.

<u>Air Quality Impact Review</u></td><td>The endorsement of the traffic forecast has been obtained from the Transport Department.</td></tr>
<tr><td>10.</td><td>The 5m buffer distance from the Palm Springs Boulevard as mentioned by the AQIR has included area of footpath, which is not in line with the definition of "buffer" as stipulated under HKPSG Chapter 9.</td><td>The buffer distance is measured from the air-sensitive use of the Proposed RCHE to the edge of road kerb of the Palm Springs Boulevard which fulfils the relevant buffer distance requirement stipulated in Table 3.1 of Chapter 9 of HKPSG.</td></tr>
<tr><td>11.</td><td>According to HKPSG Chapter 9, the recommended buffer distance for residential uses against local/district distributors should be 120m (30m with screening), instead of the 5m buffer distance as claimed by the AQIR.</td><td>The 120m buffer distance mentioned in Table 1.3 of HKPSG Chapter 9 is the general reference for road traffic noise. As the separation from the air sensitive use of the Proposed RCHE is around 10m to the Palm Springs Boulevard, a minimum separation distance of >5m setback for local distributor as stipulated in Table 3.1 of HKPSG can be fulfilled.
<table>
<tr><th>Road</th><th>Road Type</th></tr>
<tr><td>Palm Springs Boulevard</td><td>Internal Road</td></tr>
</table></td></tr>
<tr><td>12.</td><td>The buffer distance to the northern and western side of the Proposed RCHE should also be evaluated. It should be noted that the Proposed RCHE is in close proximity to the adjacent visitor carpark (i.e. with no buffer distance) as well as the sunflower path, which is the only access to the adjacent visitor carpark.</td><td>The Sunflower Path is an internal road of Palm Springs with gate bar at the entrance for restriction of access, there would be very limited number of private cars travelling along this internal road. As such, this internal road is not anticipated to induce any adverse air quality impact on the air sensitive receivers of the Proposed RCHE.

This ancillary carpark is a charged carpark with private car parking spaces for the Palm Springs Plaza. As such, mainly the visitors to the Palm Springs Plaza will use this carpark. With such limited usage, it is anticipated that this ancillary carpark would not induce any adverse air quality impact on the air sensitive receivers of the Proposed RCHE.</td></tr>
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	Public Comments	**Responses to Comments**
	<u>Sewerage Impact Assessment</u>	
13.	Palm Springs's independent sewerage network is not connected to any public sewerage network and has limited sewerage capacity. The Proposed RCHE with increased sewerage demand will lead to sewerage overflow.	The Palm Springs Plaza is connected to sewers and finally to the on-site sewage treatment plant within the Palm Springs. The Sewerage Impact Assessment has demonstrated that there will be no increase of the sewage in comparing with the original design (the uses under the Approved GBP).
14.	The SIA has compared the sewage generation of the Proposed RCHE with the "Approved GBP Scenario" (i.e. Sewage generation of 128.6 m^3/day), such scenario is not practical and does not reflect the current operating situation of the Palm Springs Plaza.	The in-house sewage treatment plant is designed to accommodate the sewage flow estimated based on the approved GBP of Palm Springs Plaza and the sewage flow estimates with the proposed RCHE is less than the sewage flow estimated based on the approved GBP.
15.	The assumed sewerage generation of the Proposed RCHE is not in line with the estimated sewerage generation of the *Code of Practice for Residential Care Homes (Elderly Persons)* and the *San Tin/Lok Ma Chau Development Node EIA, Chapter 6 Sewerage and Sewage Treatment Implications*.	The Commercial and Industrial Floor Space Utilization Survey (CIFSUS) conducted by the Planning Department has been used to determine the worker density for various economic activities and planned usage types. Environmental Protection Department's (EPD's) Guidelines for Estimating Sewage Flows for Sewage Infrastructure Planning, Version 1 (GESF) has been referred to for the purposes of estimating the quantity of the sewage generated from the Proposed Development and the existing catchment area. Sewage flow parameters and global peaking factors in this document have been adopted for the SIA.
16.	According to *Water Pollution Control Ordinance*, the sewerage generated by the Proposed RCHE should be treated as "Trade Effluent" but not "Domestic Sewage". Relevant license should also be obtained for the discharge of trade effluent.	All necessary operational licences will be obtained before the operation of the Proposed RCHE.
17.	The methodology of the SIA is not in line with the *Guidelines for Estimating Sewage Flows for Sewage Infrastructure Planning* published by EPD.	The calculation of the sewage generation and assessments follow the EPD's Guideline for Estimating Sewage Flows for Sewage Infrastructure Planning, Version 1.

	Public Comments	**Responses to Comments**
18.	The SIA has not provide adequate drawings to illustrate the detailed sewerage discharge proposal.	The RCHE is part of the Palm Springs Plaza which is connected to sewers and finally to the on-site sewage treatment plant within the Palm Springs.