PROPOSED SOCIAL WELFARE FACILITY (RESIDENTIAL CARE HOME FOR PERSONS WITH DISABILITIES) IN "VILLAGE TYPE DEVELOPMENT" ZONE ON APPROVED NAM SANG WAI OUTLINE ZONING PLAN NO. S/YL-NSW/10 AT LOTS 3669 S.A RP (PART), 3669 S.B RP (PART), 3670 RP (PART) AND ADJOINING GOVERNMENT LAND IN D.D.104, NAM SANG WAI, YUEN LONG

(Planning Application No. A/YL-NSW/348)
Response-to-Comment Table

Departmental Comments	Response
Email dated 27th June 2025 refers: **Comment from the Director of Environmental Protection** **(Comments on the EA and SIA)** **(Please refer to Appendix 1 for the Revised Environmental Assessment)**	
General	
1. S.1.2.1 - The site area is inconsistent with that provided in the planning statement, please check.	The site area is corrected.
2. Please highlight all the changes/amendments in the next submission.	Noted.
Air Quality	
1. Section 2.2.2 and Table 2.1	
a. The AQOs were updated on 11 April 2025. Please revise Table 2.1 to present the updated AQOs.	The table is updated accordingly.
2. Section 2.2.4	
a. Please delete "active and passive" in line 1.	The section is revised accordingly.
b. Please revise "open road" in line 3 to "vehicular".	The section is revised accordingly.
3. Section 2.3.1, Table 2.3 and Figure 2.1	
a. Section 2.3.1, Table 2.3 and Figure 2.1 - Please note that not only the domestic premises are the ASRs, some places/premises such as factory and workshop may also be the ASRs. Based on the desktop review, there are some areas in the vicinity of the project site which have been used for workshops/open storage, etc. Please review the potential existing/planned ASRs within the assessment area with reference to the Determination of ASR under the EIAO-TM and update as appropriate.	More ASRs have been identified in Table 2.3 and Figure 2.1. For other areas mainly for open storage use where long duration of exposure to air pollutants is not expected are, therefore, not considered as ASR.
4. Sections 2.4.1 and 2.4.2	
a. Please provide the 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. to justify the scale of construction works and hence if the construction air quality impact can be properly controlled with the implementation of the recommended mitigation measures.	The estimation is provided in Section 2.4.2 to 2.4.3 accordingly.
b. Besides the fugitive dust emission, exhaust emissions from the use of construction machinery and construction vehicles including particulate matters (PM) and gaseous emissions are also another potential source of construction air quality impact, please supplement in Section 2.4.1.	The section is revised accordingly.

c. For the Comment #4(b) above, please consider if the control measures set out in the Air Pollution Control (Non-road Mobile Machinery) (Emission) Regulation will implemented to control the emissions and supplement in Section 2.4.2.	The discussion is provided in Section 2.4.3 accordingly.
d. Please provide the details about the construction programme of the proposed development and review if there are any concurrent projects within the assessment area such that there will be any cumulative construction air quality impact to be addressed.	The construction programme is provided in Section 2.4.2 accordingly.
5. Section 2.4.2	
a. Please revise "dust" in line 1 to "air quality".	The section is revised accordingly.
b. Please revise "minimise the dust impact" in line 3 to "control the air pollutant emissions", and revise "fugitive dust" to "air quality".	The section is revised accordingly.
6. Section 2.4.3	
a. Please revise "minimized" in line 1 to "controlled".	The section is revised accordingly.
b. Please revise "dust" in line 2 to "air quality".	The section is revised accordingly.
c. Please revise "suppression" in line 5 to "control"	The section is revised accordingly.
d. Please propose any additional measures for the exhaust emissions from the use of construction machinery (e.g. if electrified NRMM will be used as far as practicable and exempted NRMM will be avoided, etc.), supplement in the additional bullets.	Additional bullets is added accordingly
7. Section 2.5.2 and Table 2.4	
a. Please clearly state that the road type of Kam Pok Road East is not available in the latest Annual Traffic Census (ATC) of the Transport Department (TD). TD's endorsement on the road type of Kam Pok Road East should be sought in order to consider it as local distributor such that 5m buffer distance requirement in Table 3.1 of Chapter 9 of HKPSG can be applied.	TD's endorsement to be provided once avaliable.
b. Please delete "of mechanical ventilation" in the 2nd last line, and revise "area" in the last line to "space".	The section is revised accordingly.
c. Also please advise if there is any proposed carpark, PTI/public transport lay-by, etc. in the proposed development. If any, their air quality impacts should be assessed.	Discussion of proposed carpark is added in section 2.5.4.
8. Section 2.5 – Industrial/chimney emission	
a. Please review if there is any source of industrial/chimney emission within the assessment area. If any, their air quality impacts should be assessed with reference to Table 3.1 of Chapter 9 of HKPSG. Please supplement in a new sub-section under Section 2.5	Discussion of industrial/chimney emission is added in Section 2.5.5.
b. As mentioned in Comment #3(a) above, it is noted that there are a number of industrial activities in the vicinity of the proposed development. Please review and further supplement the findings identified in the vicinity to support there is no active/heavy industrial operation in the vicinity and hence no adverse I/R interface problem is anticipated. Please supplement in a new sub-section under Section 2.5	Discussion of industrial/chimney emission is added in Section 2.5.5.
9. Section 2.5 – Odour emission	

a. Please review if there is any source of odour emission within the assessment area (e.g. livestock farm, lard boiling factory, STP/SPS, temple with incense/joss paper burning, nullah, etc.), if any, their air quality/odour impacts should be assessed. Please supplement in a new subsection under Section 2.5	Discussion of odour emission is added in Section 2.5.6.
10. Section 2.6.1	
a. Please add "and gaseous" after "Fugitive dust" in line 1.	The section is revised accordingly.
b. Please revise "dust" in line 2 to "air quality".	The section is revised accordingly.
c. Please delete "at source to acceptable levels" in the 2nd last line, and add "adverse" before "air".	The section is revised accordingly.
d. Please delete "to be adverse" in the last line.	The section is revised accordingly.
11. Section 2.6.2	
a. Please supplement this section by incorporating the Comments #8 and #9 above.	The section is revised accordingly.
12. Figure 2.2	
a. The buffer distance should be measured from the edge of road kerb. Please update and present the buffer zone appropriately.	Figure 2.2 is revised accordingly.
b. Please show the road name of Kam Pok Road East clearly in the figure.	Figure 2.2 is revised accordingly.
c. Please add a remark "No air-sensitive use including openable window, fresh air intake and recreational use in open space shall be located within the buffer zone".	Figure 2.2 is revised accordingly.
Email dated 18th July 2025 refers: **Comment from the Director of Environmental Protection** **(Please refer to Appendix 1 for the Revised Environmental Assessment)**	
Comments on the Noise Chapter of the Environmental Assessment:	
1. S3.2.1 i. "Good Practices on Pumping System Noise Control; and Good Practices on Ventilation System Noise Control" has been obsoleted and replaced by "Good Practices on the Control of Noise from Electrical & Mechanical Systems". Please note and update.	The guideline has been updated accordingly.
2. S3.3.1	
i. The statement of "There is no statutory control for noise arising from construction activities (except for percussive piling and the use of hand-held percussive breakers and air compressors) during non-restricted hours" is misleading and unclear. Please note that the Cap 400C&D Regulations require that such equipment comply with the noise emission standard and shall be fitted with NEL, rather than controlled under the aspect of "non-restricted hours/restricted hour". Please rephrase respective sentences.	The statement is revised accordingly.
ii. Please also consider to replace the relevant part in S3.3.1 with below: "ProPECC PN1/24 offers guidance on the existing control on noise from construction activities under the Noise Control Ordinance (NCO) and Environmental Impact Assessment Ordinance (EIAO). It also outlines the requirements and recommendations on the practices	The statement is revised accordingly.

for minimizing construction noise. The noise generated by construction activities for the project during non-restricted hours (7 a.m. to 7 p.m. on any day that is not a Sunday or general holiday) should be minimized to the greatest extent practicable. Additionally, the construction noise at the facade of the respective noise-sensitive receivers should not exceed the following noise levels, as summarised in Table 3.1 below. "	
3. S3.4.2 i. Please suggest the type of area and justify the corresponding area sensitive rating. Please also add the following after this sub-section: "In any event, the ASR assumed in this report is for indicative assessment only. It should be noted that the noise emanating from any place other than domestic premises, a public place or a construction site is controlled under Section 13 of the Noise Control Ordinance. At the time of investigation, the Noise Control Authority shall determine the noise impact from concerned sources on the basis of prevailing legislation and practices being in force and taking account of contemporary conditions/situations of adjoining land uses. Nothing in this report shall bind the Noise Control Authority in the context of law enforcement against all the sources being assessed.	The ASR is discussed and the sub-section is added in Section 3.4.3 and 3.4.4 accordingly.
1. S3.4.3 i. Please explicitly state the use of "Multi-purpose area" on the 1st floor to substantiate it doesn't require a stringent road traffic noise standard lower than 70 dB(A).	The use of Multi-purpose area is explained accordingly.
2. S3.4.7 i. Please check if it is a typo for "Thee".	The typo is corrected accordingly.
3. S.3.4.8 i. Noted that the endorsement of the revised traffic forecast by TD is to be provided. In case TD has no comment on the methodology for traffic forecast only, the consultant should provide written confirmation from the respective competent party (e.g., traffic consultant) that TD's endorsed methodology has been strictly adopted in preparing the traffic forecast data, and hence the validity of traffic data can be confirmed.	The TD endorsement and written confirmation from traffic consultant to be provided once available.
4. S.3.4.9 Table 3.6 and Appendix 3.2 i. From Appendix 3.2, the maximum L10(1 hr) under unmitigated would be 78 dB(A) at 2F_N01 and 2F_N02. This does not align with S.3.4.9 Table 3.6. Please check. Besides, it is suggested to further separate the table by floor for each facility / room type, for better presentation.	Table 3.6 is revised accordingly.
5. S.3.4.11 i. Please aware of the inconsistency of block letter for the name of PN.	The letter is revised accordingly.
6. S.3.4.12 and Fig.3.3, Appendix 3.2	
i. As shown on Fig 3.3, the reference case for Type 2 AW(BT) is under room size of 18 m² with a specified window design, providing a noise attenuation of 7 dB(A). S.3.4.12 also suggests that noise reduction depends on room size. While Appendix 3.2 proposes the use of Type 2 AW(BT) at 23 NSPs, please provide the room size in the tentative layout and any room size correction, justifying a noise attenuation of 7 dB(A)	Please be clarified that the room size of dormitory is typically 40 to 50 m^2, which is larger than 18 m^2, therefore, no room size correction is included for conservative approach.

by Type 2 AW(BT) are appropriate.	
ii. Additionally, it has been noted that absorptive material is suggested for 2F_N01 and 2F_N02, which is proposed to provide an additional noise attenuation of 1 dB(A). Please include this information in S.3.4.12 as well. Furthermore, please provide supporting details on the noise reduction efficiency and the design of how it is incorporated into the acoustic window in the appendix.	According to the latest road traffic noise results, please note that no absorptive material is required.
7. S.3.4.16 i. In order to provide a guidance for future development, please supplement the prevailing background noise levels with full details of the prevailing background noise measurement, including personnel, equipment, weather, field observations, etc., shall be documented and included in the report for easy future reference.	Discussion of prevailing background noise measurement is added in Section 3.4.16.
8. S.3.4.18 and Table 3.7	
i. Figure 3.3 is Location of Proposed Acoustic Window. Please update and provide the corresponding figure indicating the location of existing major noise sources. Please also attach the site inspection report with photo of the open storage in site visit.	Location of existing major noise sources and site inspection record are presented in Figure 3.4 and Appenidx 3.3 respectively.
ii. The location of S01 is currently unknown, but it is reported to be approximately 100 meters away from the project site. If there are no building separations between S01 and the proposed site, we recommend conducting sound measurements and providing calculations for a noise assessment. This will help to demonstrate that open storage will not negatively impact the proposed site.	Sound measurements are presented in Appendix 3.3.
iii. There was a Section 16 application (Application No. A/YL-NSW/318) for the development of a public vehicle parking area with EV charging facilities near the project site. Please confirm whether this car park is currently in operation. Even though the development may cease operations (since the planning permission for the Section 16 application is for only 5 years) upon the commencement of the proposed development, it is important to note that similar fixed noise sources may arise. Please include this information under the identification of fixed noise sources for future reference.	Discussion of public vehicle parking is added in Section 3.4.22.
9. Figure 3.3 i. For 1st floor plan, the legend for blue line is missing, please indicated what the blue line means. Is it the acoustic window?	Figure 3.3 is revised for easy reference.
10. Appendix 3.2 i. Typo of "RCHE", please check should it be "RCHD". ii. Typo of "Multi-prupose room", please check should it be "multi-purpose room".	Appendix 3.2 is revisd accordingly.
11. Figure 1.1 and Figure 3.1 i. Please separate the site boundary for the projects A/YL-NSW/348 and A/YL-NSW/349 respectively.	The Figure is revised accordingly.
12. Planning statement S6.3.2	

i. It is noted in the planning statement that "during the operation stage, air conditioning will be provided for the proposed development and not relied on openable window for ventilation, no adverse fixed noise impact and road traffic impact to the Proposed Scheme is expected". However, this differs from the description provided in the NIA report. Please review this discrepancy.	Please be clarified that air conditioning will be provided for the project while openable window for ventilation is also provided for Dormitory.
ii. Additionally, even it is equipped with fixed glazed window with installation of air conditioning, a more stringent indoor assessment for fixed noise (10 dB(A) smaller) will be applied to the proposed development. Please note and review.	Noted.
<u>Comments on the Road Traffic Noise Model</u>	
1. Please check the noise model, the unmitigated noise level in the model generated is not tally with the appendix 3.2.	Noise model and Appendix 3.2 are revised accordingly.
2. Please check and ensure the site boundary of A/YL/NSW/348 and A/YL/NSW/349 does not overlap in the model.	Noted.
3. There are breaks on the noise barrier in the model, please check, and revise if needed.	Refer to building plan in Appendix, part of the noise barrier will be removed for entrance of EVA.
4. Please provide information of the height of existing noise barrier, for our checking.	The height of existing noise barrier is obtained by site observation.
5. Texture depth is usually 1.2m, in the model it is 1.0m. Please check.	The texture depth is set to 1.2m accordingly.
6. Please check if the surface for the below segments at San Tin Highway, such as should it be bitumen instead of pervious?	Bitumen is set for the mentioned segments accordingly.
7. The speed limit for flow link 9 is 100 km/h. Only the zone refer to green coloured below is limited to 50 km/h, but it is located near the roundabout that outside 300m assessment area. Please check.	The speed limit for flow link 9 is set to 100 km/h accordingly.
<u>Email dated 17th July 2025 refers:</u> **<u>Comment from the Commissioner for Transport</u>** **<u>(Please refer to Appendix 2 for the Revised Traffic Impact Assessment)</u>**	
1. Please advise the estimated number of staff for the proposed RCHD and justify the sufficiency of parking space for staff;	As stated in the planning statement, the estimated number of staff is 45. The car parking spaces are provided for visitors only.
2. Please demonstrate there are sufficient queuing area for the car lift;	A waiting space is now provided on G/F as shown in Figure 3.1. The vehicle lift analysis found that the car lift system is acceptable and can serve the Proposed RCHD - please refer to Appendix 3 in the revised Traffic Impact Assessment ("TIA").
3. Should there be vehicles waiting to enter the car lift on G/F, from the swept path analysis, it appears that Light bus/LGV loading/unloading activities could not be carried out since there is no more space allowed for the vehicle manoeuvring. Please review;	The waiting space provided on the G/F will not obstruct the manoeuvring of light bus and LGV. Please refer to Figures SP1 and SP2 in revised TIA.
4. Please advise how to handle the situation if the car lift is malfunction or temporary suspension due to maintenance service;	If the car lift breaks down, the Property Management will immediately contact: (1) the car lift maintenance company, and (2) Fire Services Department. Then, notice will be displayed at the entrance of the car park to inform motorists of the suspension of service.

5. Please explain why the J2 junction performance in Year 2033 reference case (without RCHD) is better than that in Year 2025 existing case;	Reference is made to the improvement scheme for Junction of Castle Peak Road – Tam Mi / Kam Pok Road proposed by the approved Section 16 Planning Application A/YL-NSW/314, where the cycle time is increased from 94 to 120 seconds during AM peak period, and from 90 to 120 second during PM peak period. The junction performance is "better than that in Year 2025 existing case" after adopting this approved improvement scheme.
6. As the subject site is in Yuen Long district, please explain why this application makes reference to the RCHD in Kwai Chung;	Reference is made to RCHDs in Yuen Long listed in the web site of Social Welfare Department, and found that most of these RCHDs are located within buildings where there are other uses, and access to the RCHD is shared with other uses. Hence, it is not possible to distinguish: (i) pedestrians and traffic generated by the RCHD and other uses, and (ii) users of the internal transport facilities provided. Therefore, reference is made to RCHDs with similar characteristics, e.g., RCHD located within a standalone building, accessibility to public transport services and those with internal transport facilities.
7. Please provide justification on providing two (2) run-in/out. Please elaborate the function of each run-in/out;	$X_1Y_1Z_1$ serves as the major ingress/egress of the Site for the operation of the proposed development. $X_2Y_2Z_2$ is held under a valid Deed of Grant of Right of Way that has been obtained at Lot 3668 S.K connecting Kam Pok Road East. $X_2Y_2Z_2$ may serve as an access for the installation and maintenance of transformer room and E&M facilities.
8. The existing traffic flow in J3 is underestimated. Please review;	Reference is made to the 2023 Annual Traffic Census ("ATC") of the closest core station 5016 San Tin Highway, Castle Peak Road & San Tam Road (from Kam Tin Rd to Fairview Park Boulevard), and found that traffic flow for the month of March, when the traffic survey for the captioned was conducted, is around 1.5% lower than the annual monthly average. Hence, an adjustment factor of 1.015 is applied to the traffic flows obtained from the March 2025 survey. Please refer to Figure 2.5 in revised TIA for the revised traffic flow and Appendix 2 in revised TIA for Junction Capacity Analysis.
9. Please advise the PCs/taxis pick-up/drop off location. The PCs/taxis pick-up/drop off activities should not affect the car lift operation and Light bus/LGV loading/unloading activities;	The pick-up / drop-off activities can be conducted on G/F near the pedestrian entrance, please refer to Figure SP8 in the revised TIA.
10. Please advise the refuse collection arrangement. Should RCV would enter the subject site, swept path analysis of RCV should be provided for comment;	Reference is made to the common practice amongst many operating RCHDs in Hong Kong, where the RCHD staff is responsible for disposing refuse from the Proposed RCHD to nearby Public Refuse Collection Point. For the subject site, there nearest Public Refuse Collection Point is the Pok Wai Refuse Collection Point, which is 500m or 7 minutes' walk away.
11. Please provide a plan showing the vehicular ingress and egress routing to the subject site. Entrance for pedestrian should be shown on plan as well;	Noted. Please refer to Figure 4.1 in the revised TIA for the vehicular route and Figure 3.1 in the revised TIA for the pedestrian entrance.

12. Please provide a plan showing the pedestrian routing to the nearby franchised bus stop (both Yuen Long and Sheung Shui bound). Please specify the corresponding walking distance as well;	Noted. Please refer to Figure 2.7 in the revised TIA for the pedestrian route to the nearby franchised bus stops.
13. Para. 4.8: traffic trips specified here does not tally with the number in Table 4.4.;	Noted. Please refer to section 4.8 in revised TIA
14. Appendix 2: please specify the vehicular dimension (i.e. length and width) and driving speed adopted in the swept path analysis. Please adopt the largest possible vehicle that would enter the subject site in the swept path analysis;	Noted. Please refer to the Appendix 2 in the revised TIA.
15. Please provide a plan to demonstrate sufficient sightline could be maintained at the proposed site access;	The measured length of visibility splay for the motorists leaving the Proposed RCHD is 60m to the left and 60m to the right, which is illustrated in Figure 3.3 in the revised TIA.
16. There are noise barriers positioned at the proposed site access. Please provide details on the site access arrangement;	Portion of the existing noise barriers and related street furniture (planter) will be demolished for the proposed site access. Please refer to Appendix 3 for the proposed alterations.
17. From the planning statement, noted there is a separate planning application by the same applicant at the adjoining site for an RCHE. Please explore the feasibility of having a shared site access for the RCHD and RCHE site as well as the car ramp to the basement carpark; and	Please note that the proposed RCHD and RCHE are structurally independent and self-contained. Site access and car ramp to the basement carpark will not be shared.
18. Noted only two loading/ unloading spaces are provided in the subject site and given the loading/unloading activities for persons with disabilities would take extra time, please critically review the site layout to ensure the loading/unloading activities would not block the site entrance or causing queuing back problem.	Based on survey of RCHDs with similar characteristics, it is expected there are no more than 2 goods deliveries a day and these vehicles stay for less than 20 minutes. If required by Transport Department, the Applicant is willing to arrange for goods delivery to be conducted during the non-peak hours and for these deliveries not to be conducted concurrently.
Email dated 4th July 2025 refers: **Comments of the Chief Highway Engineer/New Territories West, Highways Department:**	
1. The applicant should ensure the run-in/out at Kam Pok Road East is constructed in accordance with the latest version of HyD Standard Drawings no. H1113 and H1114, or H5133, H5134 and H5135, whichever set if appropriate to match with the existing adjacent pavement;	Noted.
2. It is noted that there are existing noise barriers under HyD's maintenance purview at the south-east boundary of the site, adjoining Kam Pok Road East. Please advise if there are any modification or alteration of the noise barriers among other road features (e.g. the existing footpath/ carriageway adjoining the site) be required arising from the proposed development.	Please refer to Appendix 3 for the Modification Plans of Noise Barrier and Street Furniture.