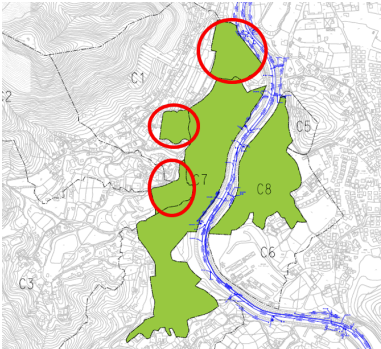


Attachment 1

	Responses-to-Comments Table
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Proposed Amendment to the Approved Kwu Tung South Outline Zoning Plan No. S/NE-KTS/22 From “Agriculture” Zone and “Green Belt” Zone to “Government, Institution or Community” Zone at Various Lots in D.D.94, 98 & 100 and Adjoining Government Land, Kwu Tung South, New Territories (TPB Ref. Y/NE-KTS/18)
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Comments/ Suggestions	Applicant/ Consultant's Responses
A. Comments from Drainage Services Department received from Planning Department on 04.12.2025: (Contact person: Mr. Liu Qi, Keith, Tel no.: 2300 1595)	
<p>Please find preliminary comments from DSD after quick review of your submissions (responsible officer: Mr. Keith Liu, 2300 1595). More comments will be supplemented after detailed review of the submissions</p> <p>For SIA:</p> <ol style="list-style-type: none"> Please include the tentative layout plans of the proposed 2 STPs (and its emergency storage tanks) and its design discharge standard for report completeness. The SIA report needs to meet the satisfaction of SIG/EPD, the planning authority of sewerage infrastructure <p>For DIA:</p> <ol style="list-style-type: none"> Section 3.1.3 - Please correct typo in "Ration" method. Appendix 2 - Please advise what catchment no. do these circled areas fall into. If they fall within Catchment C1-C6, please update the table in Appendix 2. 	<p>The tentative locations of the Proposed 2 STPs and its emergency storage tanks are supplemented in Appendix 2.2 of the revised SIA report and their design standards are supplemented in Section 2.5.6 of the revised SIA report (Attachment 2 refers). Please be advised that the footprints and sizes of STPs and their emergency storage tanks are subject to detailed design stage as there is flexible room in the proposed car park area.</p> <p>Noted.</p> <p>Section 3.1.3 of the DIA has been revised accordingly (Attachment 3 refers).</p> <p>Please be advised that the circled areas fall within Catchment C7 of the Application Site.</p>

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3.	Appendix 2 - Please enhance the legibility of the layout plan shown in the capacity check.	Noted. Legends are supplemented to the Annex 3 (Former Annex 2) of the revised DIA (Attachment 3 refers).
4.	Appendix 2 - Please assess the potential drainage impacts to the River Beas.	Noted. Sensitivity checking of Beas River is provided in the Annex 4 of the revised DIA (Attachment 3 refers).
5.	Master plan - Please advise if there are any piers for the proposed link bridges within the Beas River.	Please be advised that no piers are proposed for the two link-bridges across Beas River. The Master Layout Plans of the Indicative Development Scheme are also supplemented in Annex 1 of the DIA (Attachment 3 refers).
B.	Comments from Transport Operations (NT) Division of Transport Department received from Planning Department on 05.12.2025: (Contact person: Mr. CHAN Chi Ching, Brian / Ms. Wong Ho Yan, Doris, Tel no.: 2399 2175 / 2399 6998)	
1.	We note from the Traffic Review Report that student dormitory with internal transport facilities would be provided at this international school development. Please advise whether "student services" (i.e. school bus services) will be provided to all the students travel between their home places and this school development. If not, please provide public transport analysis for this school development and provide proposals on improvement of public transport services for consideration.	Please be advised that school bus services will be provided for the Proposed School. Applications for operation of Student Service (A03) will be submitted to Transport Department prior to commencement of operation.
C.	Comments from Transport Planning Division of Transport Department received from Planning Department on 05.12.2025: (Contact person: Ms. REN Yannan, Tel no. 3842 6035)	
1.	In light of the proposed international school potentially interfacing with the NMH, please find below our comments on the Traffic Review report regarding the aspects related to NMH. The NMH project is currently under investigation stage under Agreement No. CE 4/2024 (HY). The project proponent should maintain close liaison with the HyD project office to ensure smooth project integration with NMH for the proposed connection between the San Tin Technopole Interchange (i.e. NMH interchange I/C 04) and the proposed school. Based on our understanding, the design of the San Tin Technopole Interchange is ongoing. Please ensure that an agreement on the future connection arrangement is obtained in a timely manner between the two projects for smooth implementation of proposed school and NMH.	Noted.

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2. Table 4.3 – Please double-check with the NMH project to ensure that the traffic flows and v/c adopted align with NMH's latest traffic assessment results.	Noted.
3. Please clarify if the design of the San Tin Technopole Interchange has accounted for the traffic generated by the proposed school.	Given that the design of San Tin Technopole Interchange is ongoing and is yet to be finalised, the Project Proponent will liaise with Highways Department at appropriate time to ensure that traffic generated by the Proposed School would be duly considered in the design.
4. Other than the above aspects mainly related to the NMH, please also find below our observations related to traffic generation and traffic assessment for your consideration.	
a. Section 4 – Considering the projection location is close to strategic roadwork, and the traffic generation is much higher than 100 pcu/hr, a 2-tier transport model should be developed to estimate the future traffic impact induced by the proposed development, especially to proposed NMH.	According to the Final Report of “TD507/2023 Base District Traffic Models for the New Territories Area (2024 Update)” (the “ <i>BDTM Study</i> ”) purchased from Transport Department, “ <i>the overall modelling approach for BDTMs adopts a two-tier modelling approach. The upper tier is the CTS Model, which is a strategic multi-modal model ...</i> ”. In view of the above, 2-tier transport model with appropriate assumptions has been duly considered to assess the traffic impact of the Proposed School.
b. Table 4.1 (trip generation rates) – Please justify whether the trip generation rates adopted are suitable for estimating traffic generation for an international school. Consideration should be given to the characteristics of student pick-up and drop-off activities at international schools. Reference traffic count surveys of international schools should be carried for deriving a more realistic trip generation rate.	The TPDM has no trip generation rates for kindergarten, primary school and middle / high school. To ensure consistency, reference is made to the BDTM Study Final Report published by TD. As “ <i>Kindergarten (Private)</i> ”, “ <i>Primary School (Private)</i> ” and “ <i>Secondary School (Private)</i> ” have higher trip generation rates than “ <i>Kindergarten</i> ”, “ <i>Primary School</i> ” and “ <i>Secondary School</i> ”, the rates for “ <i>Kindergarten (Private)</i> ”, “ <i>Primary School (Private)</i> ” and “ <i>Secondary School (Private)</i> ” are adopted in the submitted Traffic Review in Appendix 4 to represent the worst case scenario.
c. Section 4.5 (proposed school traffic generation) – It is noted that the estimation of traffic generation is based on the assumption of staggered school hours, which is not considered conservative. Please conduct a sensitivity test that takes into account traffic generation from kindergarten, primary, middle/high school students during the same period.	Staggered school hours is a normal arrangement in Hong Kong schools as accommodating all student arrivals and departures simultaneously pose significant logistical challenges. Furthermore, learning hours required for various educational stages differ. Generally, “ <i>Staggered School Hours</i> ” situations are: <ul style="list-style-type: none"> Kindergartens offering 3–4 hours of structured learning Primary schools having about 5–5.5 hours of class per school day Secondary schools with a wider curriculum have often longer school days The conduct of sensitivity test is therefore considered not necessary.
d. Consideration should be given to the potential mismatch in the commissioning timelines of the proposed school and NMH. If the San	There is no intention to commence operation of the Proposed School prior to the commission of the NMH. The Proposed School <u>will only open for operation after</u>

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<p>Tin section of NMH is commissioned after the school, please advise on the vehicular access arrangement for the school. Relevant traffic assessment to local road networks should be reviewed and included in the submission.</p> <p>e. A traffic flow split diagram should be provided to indicate the ingress and egress routes for traffic generated by the proposed school, for both scenarios: connection to NMH and connection to the local road network in case NMH is delayed.</p> <p>f. Section 3.18 – It is noted that approximately 300 meters are proposed within the school for queuing of vehicles. However, according to the master layout plan attached in the planning application, the proposed location of the kindergarten and primary school is close to the vehicular access. Please clarify the location of the pick-up and drop-off area for private cars for the kindergarten and primary school, and demonstrate that parent vehicles will not queue back to the local road and slip road of the NMH.</p>	<p><u>commissioning of the San Tin Section of Northern Metropolis Highway</u>, tentatively scheduled for 2036.</p> <p>Given that the design of San Tin Technopole Interchange is ongoing and is yet to be finalised, the Project Proponent will liaise with Highways Department once a clearer picture is available. At the planning stage, it is anticipated that the Proposed School will generate insignificant traffic volume onto the Northern Metropolis Highway (NMH) as boarding facilities will be provided for senior primary (i.e. middle school) and secondary school (i.e. high school) students. The Proposed School will only commence operation once NMH is operational and it is not intended to connect to local road network.</p> <p>As shown in the below diagram extracted from Figure 3.1 of the submitted Traffic Review Report in Appendix 4, the ingress of pick-up / drop-off area for kindergarten and primary school (<u>indicated in red coloured cloud and red arrow</u>) is located around 300m from the vehicular access:</p>

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<p>g. Section 4.7 – Please provide the modelling methodology of the proposed Local Area Traffic Model.</p>	<div data-bbox="1024 305 2005 1084"></div> <p>The BDTM NTW1, produced by Transport Department, has been adopted in the submitted Traffic Review. Although the BDTM was well-validated, the traffic network and zone within and in the vicinity of the subject site were reviewed to ensure that the level of details of the BDTM could produce the required traffic flows. In addition, please be advised that the planned developments and road networks were considered to ensure that the required traffic flows could be produced.</p> <p>The major planned developments and road networks include but not limited to the following:</p> <ul style="list-style-type: none">• San Tin Technopole• Kwu Tung North and Fanling North New Development Area

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h.	Section 3.16 – Please advise if all middle/high school students are boarding students.	<ul style="list-style-type: none">• Ngau Tam Mei Area• Innovation and Technology Park in the Lok Ma Chau Loop• Northern Metropolis Highway Based on the above, the design year traffic flows are estimated with reference to the following: <ul style="list-style-type: none">• 2036 and 2041 peak hour traffic models from the BDTM; and traffic generation to / from the Proposed School.
i.	An assessment of the traffic impact on local road networks and public transport reviewed and included in the submission.	As stated in the submitted Traffic Review Report, all middle / high school students are boarding students. The submitted Traffic Review Report has concluded that the Northern Metropolis Highway has sufficient capacity to accommodate the additional traffic generated by the Proposed School. Nevertheless, the Project Proponent will liaise with Highways Department at appropriate time to ensure that traffic generated by the Proposed School is duly taken into account in the ongoing design of the San Tin Technopole Interchange.
D.	Comments from Architectural Services Department received from Planning Department on 12.12.2025: (Contact person: Ms. CHEUNG Wai, Jacqui, Tel no. 2582 5322)	
1.	Based on the information provided, it is noted that the proposed development mainly consists of 24 building blocks with a maximum building height (BH) of 10 storeys (53.5mPD). The building scale of the proposed development appears to be much larger than the existing low-rise developments. However, from the photomontages provided, it appears that the proposal would have little impact to the surrounding environment. In this regard, we have no comment from architectural and visual impact point of view, subject to PlanD's view.	Noted.
E.	Comments from Fire Services Department received from Planning Department on 12.12.2025: (Contact person: Mr. LI Chi Fung, Tel no. 2733 5844)	
1.	Please be informed that we have no specific comment on the proposal subject to fire service installations and water supplies for firefighting being provided to the satisfaction of the Director of Fire Services.	Noted. The Applicant will take responsibility to plan and install firefighting facilities to the satisfaction of FSD during implementation stage.

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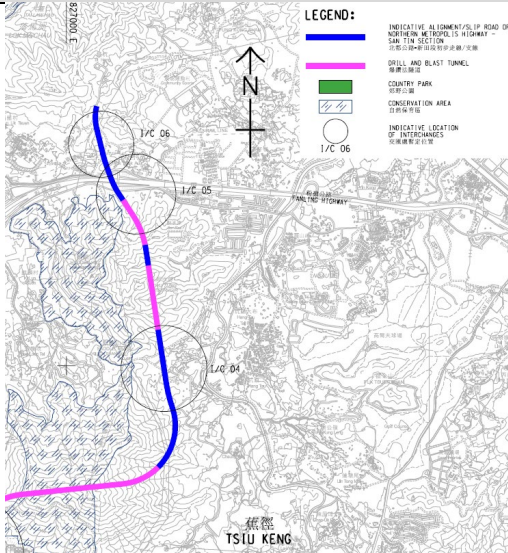
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2.	Detailed fire safety requirements will be formulated upon receipt of the formal submission of general building plans.	Noted.
3.	Furthermore, the provision of emergency vehicular access in the subject work shall comply with the requirements as stipulated in Section 6, Part D of the Code of Practice for Fire Safety in Buildings 2011.	Noted.
4.	Moreover, if the proposed work affect any provision of emergency vehicular access to nearby buildings, the consultant should make a separate enquiry to this Department to ensure the feasibility of the work.	Noted.
F. Comments from Agriculture, Fisheries and Conservation Department received from Planning Department on 12.12.2025 and 18.12.2025: (Contact person: Mr. LAU Yun Kwan, Tel no. 2150 6931)		
<p><u>Comments received on 12.12.2025</u></p> <p>Our comments from agricultural and fisheries perspectives will be provided once available. At the same time, please find our comments from nature conservation perspective as follows:</p>		
1.	AFCD's site visit on 2.12.2025 recorded floral and faunal species of conservation importance (e.g. Black-winged stilts, Eurasian Teals, Common Kingfishers, Grey Herons and Greater Coucals, etc.), wooded habitats, and wetland habitats within and in the vicinity of the application site.	Noted. Please be advised that published bird observations records of those identified species from 'ebird' are reported in the submitted Ecological Review in Appendix 6.
2.	Part of the application site encroaches over existing mitigation areas on government land, which were established when River Beas was channelised under the Rural Drainage Rehabilitation Scheme. The mitigation areas where AFCD is responsible for vegetation maintenance are attached and <u>highlighted in green</u> for reference. Please consider avoiding the encroachment and establishing buffer zones around the areas first. If the encroachment is demonstrated to be unavoidable, reprovion of the areas within the application site is required. [See attachment "The concerned mitigation areas.pdf"]	Noted. Please note that the layout of the Development Scheme is currently indicative only and during detailed design, the Applicant will review the feasibility of avoiding existing mitigation areas of the stream and establish buffer zones per current practices as far as practical to minimise adverse ecological impact, subject to detailed design. In any event that if avoidance is not considered feasible in the Indicative Development Scheme, the Applicant will consider reprovioning mitigation areas nearby, subject to further detailed design.

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<div data-bbox="184 300 562 841" data-label="Image"> </div> <p>3. The ecological review at Appendix 6 is preliminary in nature and cannot support evaluations of potential ecological impacts arising from the proposed development at this stage. The applicant is advised to conduct a detailed ecological impact assessment (EcoIA) including ecological baseline surveys covering the wet and dry seasons. For general requirements for an EcoIA, reference should be made to Annexes 8 and 16 of the Technical Memorandum on Environmental Impact Assessment Process and Environmental Impact Assessment Ordinance Guidance Notes No. 7/2023 and No. 10/2023. The EcoIA should also take into account how construction materials will be transported to the site and whether any haul roads or traffic roads will need to be constructed by the applicant for the proposed development.</p>	<p>The Rezoning Site is not considered ecological sensitive with reference to the findings on the agricultural uses of two relevant studies in the vicinity, namely:</p> <ul style="list-style-type: none"> (1) The 'Report on Preliminary Technical Study (Final) – Engineering Feasibility Study for the Establishment of an Agricultural Park – Feasibility Study (Feb 2017) (2) Northern Metropolis Highway – San Tin Section (Project Profile) under EIAO, April 2025 <p>In particular, the proposed Interchange No. I/C 04 is located next to the Site, as indicated below.</p>

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<p>4. Mitigation measures in the order of avoidance, minimization and compensation should be proposed for any significant ecological impacts to be identified.</p> <ul style="list-style-type: none"> When significant ecological impacts are identified, modification of the project shall be considered first (e.g. change of site, design, construction method, alignment, layout, programme, etc.). Preservation of natural habitats (e.g. secondary woodland, natural watercourses, etc.) and floral species of conservation importance should also be considered first. In terms of compensation measures, significant loss of important species and habitats shall be mitigated by measures such as reprovision of the same or similar species/habitats or enhancement of existing habitats within the application site. <p>5. The applicant should submit a working paper for ecological baseline surveys for AFCD's review before conducting the surveys. In addition, the surveys should investigate potential bird flight lines, if any, over the application site and its vicinity.</p>	 <p>Indicative Location of Interchange No. I/C 04 next to the Site</p> <p>The principle of “avoidance, minimization and compensation” will be adopted in the construction and operation stages.</p> <p>Noted. A working paper for ecological baseline survey may be required to monitor the ecology therein and will be provided in the event that an ecological assessment is required.</p>

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<p>6. Further comments will be provided when the working paper for ecological baseline surveys and the EcolA are available for review.</p>	<p>Noted.</p>
<p><u>Comments received on 18.12.2025</u></p>	
<p><u>From agricultural perspective</u></p>	
<p>7. The subject site falls within the "AGR" and "GB" zones and is generally abandoned with some agricultural activities. The agricultural activities are also active in the vicinity, and agricultural infrastructures such as road access and water source are also available. The subject site can be used for agricultural activities such as open-field cultivation, greenhouses, plant nurseries, etc. As the subject site possesses potential for agricultural rehabilitation, the proposed rezoning is not supported from agricultural perspective.</p>	<p>As the Site is strategically located within the Northern Metropolis, which has drastically altered the planning context, a new and innovative mindset which responds to the current National and Government planning initiatives in supporting the Educational and I&T hub developments within the Northern Metropolis is considered necessary. The proposed rezoning to “G/IC” zone, which facilitates the provision of the Proposed School, is considered a key supporting aspect to bring forth this vision.</p>
<p><u>From fisheries perspective</u></p>	
<p>8. Agriculture (AGR) zone is intended primarily to retain and safeguard good quality agricultural land, farms, and fishponds for agricultural purposes. Given there are active fishponds located within and adjacent to the application sites, the proposed rezoning and development is anticipated to result in permanent loss of fisheries resources and secondary impact to fisheries.</p>	<p>Ditto. Please refer to our response provided in Column F8.</p>
<p>9. The application site is in close vicinity to other major development projects such as San Tin/Lok Ma Chau Development Node, North Metropolis Highway, and Northern Link, cumulative fisheries impacts should be assessed and taken into account to avoid, minimise and mitigate additional impacts on fisheries resources.</p>	<p>Please be ensured that the principle of avoidance, minimisation and mitigation has been adopted in the Indicative Development Scheme.</p>
<p>10. Considering that no fisheries impact assessment has been included in the submission, AFCD (Fisheries) has reservation regarding the proposed rezoning and development. The applicant should assess and evaluate the potential and cumulative impacts of the proposed rezoning and development on fisheries, particularly on the existing fishponds within and adjacent to the application sites.</p>	<p>Noted.</p>

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G.	Comments from Kindergarten Administration Section, Education Bureau received from Planning Department on 15.12.2025: (Contact person: Ms. AU Suet Yee, Christine, Tel no. 2892 5033)	
	<u>KG provision</u>	
1.	KGs in Hong Kong are privately run and the provision of KG in private land lot is market driven. We have no specific views on the provision of KG in the subject area.	Noted.
2.	Please find below our comments/ concerns for matters regarding Schedule of Accommodation (SoA), Gross Floor Area (GFA) and parking and loading/unloading (L/UL) spaces for the proposed KG(s).	
	<u>SoA and GFA for a 6-classroom KG</u>	
3.	Please be informed that the “SoA for KG premises” has been revised to improve the learning environment by increasing the indoor floor area for each student by 20%. The revised recommended SoA for a 6-classroom KG has come into effect from October 2017 which is recommended for reserving space in developing new KGs as far as practicable, and is available for reference in the Appendix 3 of the “Operation Manual for Pre-primary Institutions” (OM). We wish to point out that the total area for all items excluding toilet and outdoor play area as stated in the revised SoA for a 6-classroom KG is 551 square metres, and we trust that the toilet and sanitary facilities for students and staff should be adequately provided and outdoor play area should be provided whenever possible in the proposed KG. For your reference, for some KG premises having marked in GIC sites, the GFA for a 6-classroom KG is approximate 900 square metres. <i>[See attachment "Annex - Revised recommended SoA for 6-classroom KG.pdf"]</i>	Noted.
4.	As for a KG with more than 6 classrooms which targets to accommodate greater number of students and school staff, the revised SoA for 6 classrooms may not fully meet the needs of more students and teaching staff. Under such situation, the developer may consider making corresponding adjustment to increase the indoor areas (e.g. multi-purpose area/room, small group teaching rooms, etc.) as far as practicable. Moreover, the developer may also consider adjusting the numbers and/or size for the items where deemed necessary (e.g.	Noted. Please be advised that the proposed KG provides equal or greater indoor floor area than recommended in the SOA.

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<p>reasonable provision of general facilities, such as Staff Office, Administrative Office, General Store, Kitchen, Laundry and Toilet etc.) to cater for the greater number of teaching staff and students as far as practicable.</p>	
<p>5. It is also noted from the planning statement that the proposed KG block with building height 29.5m PD would be proposed. Please refer to relevant requirements as stated in the OM: “to ensure that children gain easy access, pre-primary institutions should ideally, be located on the ground floor or the podium floor” and “In case of child care centres and KGs for children over 2 years of age, the height shall not be more than 24m above ground level” (items 1.1.1 and 1.21. of OM refer).</p>	<p>Noted. Please be advised that the building height of the proposed KG is 16.5m above ground level.</p>
<p><u>Safety concerns on L/UL spaces for KG school buses</u></p>	
<p>6. While parking and L/UL requirements for KG school buses are beyond our Bureau's preview, the developer concerned may refer to Table 11, Section 2 of Chapter 8 “Internal Transport Facilities” of the Hong Kong Planning Standards and Guidelines for relevant requirements as necessary. The developer is also advised to note the following safety concerns on L/UL space in respect of the KG students' use:</p>	
<p>a. designated L/UL period for KG school buses so as to avoid possible danger to KG students owing to the clash in using the space with other users;</p>	<p>Noted.</p>
<p>b. the safety of KG students walking between the L/UL spaces to the KG premises should be ensured at all time.</p>	<p>Noted.</p>
<p>7. Meanwhile, the developer should ascertain the premises for the proposed KG(s) can meet the various requirements laid down in:</p>	
<p>a. the Education Ordinance, Education Regulations and relevant statutory requirements; and</p>	<p>Noted and please be advised that the proposed KG will comply with all relevant statutory requirements.</p>
<p>b. “Operation Manual for Pre-primary Institutions”. Relevant link of “Operation Manual for Pre-primary Institutions”: https://www.edb.gov.hk/attachment/en/edu-system/preprimary-kindergarten/about-preprimary-kindergarten/Operation_Manual_eng.pdf</p>	<p>Noted and please be advised that the proposed KG will comply with all relevant statutory requirements.</p>

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H.	Comments from Food and Environmental Hygiene Department received from Planning Department on 16.12.2025: (Contact person: Mr. CHAN Lap Yan, Raymond, Tel no. 3141 1231)	
	Please be informed that FEHD has no adverse comment on the subject planning application. Our advisory comments are provided as follows. Thank you.	
1.	No Food and Environmental Hygiene Department's (FEHD) facilities should be affected. If any FEHD facility is affected by the development, FEHD's prior consent must be obtained. Reprovisioning of the affected facilities by the project proponent up to the satisfaction of FEHD would be required.	Noted.
2.	Proper licence / permit issued by this Department is required if there is any food business / catering service / activities regulated by the Director of Food and Environmental Hygiene (DFEH) under the Public Health and Municipal Services Ordinance (Cap. 132) and other relevant legislation for the public. In accordance with Section 4 of Food Business Regulation, Cap.132X, the expression 'food business' means any trade or business for the purpose of which any person engages in the handling of food or food is sold by means of a vending machine but does not include any school or work place (other than a factory canteen referred to in section 31) for the use exclusively of the pupils of the school and the persons employed in the work place. As such, a staff canteen that exclusively use by the staff members of that working place does not require a food business licence from this department. However, if the business is conducted in such a way as to fall within the definition of “food business”, a food licence will be required.	Noted.
3.	Depending on the mode of operation, if canteen (other than a factory canteen referred to in section 31, Cap. 132) is provided exclusively for the use of person exclusively employed or residing in the development, FEHD staff may conduct inspections of the canteen on regular basis.	Noted.
4.	With regard to the sale of milk, frozen confections, non-bottled drinks, cut fruit, sushi and sashimi etc., being restricted foods items as specified in the Schedule 2 to the Food Business Regulation, the	Noted.

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<p>5. permission in writing of the Food and Environmental Hygiene Department is required under Section 30 of the said Regulation.</p> <p>Proper licence issued by this Department is required if related place of entertainment is involved. Any person who desires to keep or use any place of public entertainment for example a theatre and cinema or a place, building, erection or structure, whether temporary or permanent, on one occasion or more, capable of accommodating the public presenting or carrying on public entertainment within Places of Public entertainment (PPE) Ordinance (Cap. 172) and its subsidiary legislation, such as a concert, opera, ballet, stage performance or other musical, dramatic or theatrical entertainment, cinematograph or laser projection display, a circus, a lecture or story-telling, an exhibition of any 1 or more of the following, namely, pictures, photographs, books, manuscripts or other documents or other things, a sporting exhibition or contest, a bazaar, a dance part or an amusement ride and mechanical device which is designed for amusement, a Place of Public Entertainment Licence (or Temporary Place of Public Entertainment Licence) should be obtained from FEHD whatever the general public is admitted with or without payment.</p>	<p>Noted.</p>
<p>6. Under section 3A of the Ordinance (Cap. 172), the Secretary for Home Affairs (SHA) may by order published in the Gazette exempt places of public entertainment from the application of the Ordinance or any part thereof. The Places of Public Entertainment (Exemption) Order (Cap.172D) (Last updated in 2015) is an exemption order made under that section to exempt the following places of public entertainment from certain requirements to obtain a licence under the Ordinance</p> <ul style="list-style-type: none"> (a) Places that are under the management of the Leisure and Cultural Services Department (LCSD), the Home Affairs Department (HAD), the Legislative Council Commission or the Judiciary; (b) Places issued with a liquor licence under the Dutiable Commodities (Liquor) Regulations (Cap. 109 sub. leg.); (c) Places that are club-houses under the Clubs (Safety of Premises) Ordinance (Cap. 376); and (d) Places issued with a public dance-hall licence under the Miscellaneous Licences Ordinance (Cap. 114). 	<p>Noted.</p>

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7.	A swimming pool licence must be obtained from FEHD for any artificially constructed pool used for swimming or bathing and to which the public have access (whether on payment or otherwise) or which is operated by any club, institution, association or other organization.	Noted.
8.	There should be no encroachment on the public place and no environmental nuisance should be generated to the surroundings. Its state should not be a nuisance or injurious or dangerous to health and surrounding environment. Also, for any waste generated from such development/ operation, the applicant should arrange disposal properly at their own expenses.	Noted.
9.	If provision of cleansing service for new public roads, streets, cycle tracks, footpaths, paved areas etc, is required, FEHD should be separately consulted. Prior consent from FEHD must be obtained and sufficient amount of recurrent cost may have to be provided to us.	Noted.
10.	If domestic waste collection service of FEHD is required in future, prior comments from this Department on the waste collection plan, including the accessibility and maneuverability of RCV to RCP, should be sought.	Noted.
I.	Comments from Landscape Unit, Urban Design & Landscape Section of Planning Department received from Planning Department on 16.12.2025: (Contact person: Mr. NG Tat Yuen, Henry, Tel no. 3565 3950)	
	I refer to your preceding emails. We have <u>reservation</u> on the application and our detailed comments from landscape planning perspective are as follows: -	
(a)	With reference to the aerial photo taken in Feb 2024, the Site occupies two pieces of land totaling about 17.1 ha, which is largely vegetated with tree clusters and contains streams, ponds and patches of hard-paved areas to the north and south. It is located to the south of Fanling Highway on both sides of Sheung Yue River, flanked by Ki Lun Shan to the west and Hang Tau Village to the east. The Site is situated in an area of rural inland plain landscape character comprising Sheung Yue River, ponds, tree clusters, farmlands, village houses, low-rise residential developments and temporary structures;	Noted.
(b)	Section 2 of the Application Form stated that the development proposal would not cause any adverse landscape impact nor tree	As with most development projects in rural areas, there are initial landscape impacts which require mitigation. As outlined in the submitted Landscape Proposal in

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<p>fellings. However, discrepancies are found in the Landscape Proposal under the Supplementary Planning Statement (SPS) in that filling of ponds and streams, and felling of approx. 1250 – 1300 trees in groups and 39 individual trees (including trees of particular interest (TPI) with DBH over 1m, mature trees and protected species under Cap. 96) are proposed. It is considered that there will be adverse landscape impacts;</p>	<p>Appendix 2 of the SPS, tree removal in the Indicative Development Scheme is considered necessary to make way to site formation works to facilitate the Indicative Development Scheme. While there are inevitably initial impacts on existing landscape resources which include the potential loss of some agricultural ponds, modified streams and trees of planted origin, subject to detailed design, as illustrated in the submitted Landscape Impact Assessment in Appendix 2, it is considered that these impacts can be mitigated in the longer term with the implementation of the proposed landscape measures.</p>
<p>(c) According to the application, planting of 1,150 new heavy standard trees and large palms (i.e. in a replanting ratio of 1:1 (new trees : trees felled)) is proposed inside the Site. There is no information whether preservation of the distinctive landscape resources, including TPI, mature trees and protected species, has been fully considered; and</p>	<p>Please be advised that the Applicant has given due consideration for the preservation of the trees of larger sizes identified within the Site. However, given the necessary site formation level is typically 1-2m or more above existing levels to minimise potential flooding risk, negating localised tree retention within the development area. Nevertheless, the proposed setbacks for the formation of a riverside park can facilitate preservation of some of these larger trees.</p> <p>The protected species (<i>Magnolia x alba</i>) is a commonly planted tree species in Hong Kong, and the surveyed trees are clearly of planted origin. The intent of Cap 96. is to protect naturally occurring specimens of this species but can be discounted for these amenity trees.</p>
<p>(d) The applicant should ensure that no adverse landscape impacts would be caused by the proposed cross-river links crossing Sheung Yue River.</p>	<p>Some localised tree removal is required in the vicinity of the bridge abutments, which is accounted for in the submitted Landscape Impact Assessment in Appendix 2. As the bridges are proposed as a single span, with no piers or structures within the river course, further adverse impacts are not anticipated.</p>
<p><u>Advisory Comments</u></p>	
<p>(a) The applicant should be advised that approval of the application does not imply approval of tree works such as pruning, transplanting and felling. Application for any tree works should be submitted to relevant departments for approval; and</p>	<p>Noted.</p>
<p>(b) For compliance of site coverage of greenery requirements under PNAP APP-152, submission should be made to Building Department (BD) for comments and approval.</p>	<p>Noted.</p>

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J.	Comments from North District Leisure Services Office (NDLSO) and New Territories North Tree Team (NTNTT) of Leisure and Cultural Services Department received from Planning Department on 17.12.2025: (Contact person: Miss TSOI Tan Ha, Sarah, Tel no. 3549 6618)	
1.	<u>NDLSO</u> Should any existing facilities or roadside amenity areas under LCSD's purview be affected, the applicant should act in accordance with the prevailing guidelines or technical circulars issued by DEVB or other government departments. LCSD reserves the right to provide further comment on LCSD-related issues upon receiving relevant submissions in the future.	Noted.
2.	<u>NTNTT</u> Should any tree under LCSD maintenance be inevitably affected by the captioned application, the project department should act in accordance with the prevailing DEVB TC (W) No. 4/2020 and relevant guidelines stipulated by DEVB and other departments.	Noted.
K.	Comments from Electrical & Mechanical Services Department received from Planning Department on 18.12.2025: (Contact person: Mr. HO Kin Yip, Tel no. 2808 3111)	
1.	<u>Electricity Safety</u> Please be advised that we have no particular comment on the document from electricity supply safety aspect. However, in the interests of public safety and ensuring the continuity of electricity supply, the parties concerned with planning, designing, organizing and supervising any activity near the underground cable or overhead line under the mentioned document should approach the electricity supplier (i.e. CLP Power) for the requisition of cable plans (and overhead line alignment drawings, where applicable) to find out whether there is any underground cable and/or overhead line within and/or in the vicinity of the concerned site. They should also be reminded to observe the Electricity Supply Lines (Protection) Regulation and the “Code of Practice on Working near Electricity Supply Lines” established under the Regulation when carrying out works in the vicinity of the electricity supply lines.	Noted.

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2.	We have no particular comment on the document as far as electricity supply safety is concerned.	Noted.
L. Comments from Highways Department received from Planning Department on 18.12.2025: (Contact person: Mr. LAM Chun To, Tel no. 2762 4090)		
	I refer to your email dated 27 November 2025, we have no comment on the subject application from the highways maintenance perspective.	Noted.
	Meanwhile, the applicant should be reminded that:-	
1.	The proposed access arrangement should be commented by TD;	Noted.
2.	HyD is not/shall not be responsible for the maintenance of any access connecting the application site and the nearest public road. Presumably, the relevant departments will provide their comments to you, if any; and	Noted.
3.	Adequate drainage measures should be provided to prevent surface water running from the application site to the nearby public roads and drains.	Noted.

It is noted that the following Government Departments have no objections to / no adverse comments to the S12A Planning Application:

- Civil Engineering and Development Department (North Development Office) (received on 17/12/2025)
- Hong Kong Police Force (received on 17/12/2025)
- Home Affairs Department (North District Office) (received on 17/12/2025)

Date: 24 December 2025

File Ref: SYRKTS