

## Further Information (6)

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Response-to-Comments

**Section 12A Planning Application No. Y/NE-LYT/16**

Request for Amendment to the Approved Lung Yeuk Tau and Kwan Tei South Outline Zoning Plan No.S/NE-LYT/19 from “Residential (Group C)” Zone and “Agriculture” Zone to “Residential (Group A)2” Zone at Various Lots in D.D. 83 and Adjoining Government Land in D.D. 83, Lung Yeuk Tau, New Territories

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**Responses-to-Comments Table**

Date	Department	Comments	Responses
7.3.2024	Environmental Protection Department	<p><b>Environmental Assessment Report</b> <u>Air Quality Perspective</u></p> <p>1. Section 2.3 PATH v2.1 has been upgraded to PATH v3.0. Please update the relevant text and data where necessary.</p>	<p>Please refer to <b>Appendix 1</b> for the revised EA.</p> <p>Table 2-5 has been updated according to the latest PATH model data.</p>
		<p>2. Section 2.4.6 Please check whether Queen's Hill Extension would be the concurrent project to this proposed development.</p>	<p>Noted. Queen's Hill extension will be discussed as the concurrent project of the proposed development. The relevant sections under Section 2.4 have been revised accordingly.</p>
		<p>3. An EM&amp;A program should be implemented to monitor the dust impact arising from the construction activities associated with the proposed development.</p>	<p>Section 2.4.8 is added to discuss the monitoring of dust impact.</p>
		<p>4. Section 2.4.18 to 2.4.26</p> <p>(a) Please clarify the capacity of the proposed STW which is 7,000m<sup>3</sup>/day according to the Sewerage Impact Assessment of the 4th round of Further Information.</p> <p>(b) Please make reference to the approved EIA report AEIAR-207/2017 - Expansion of Sha Tau Kok Sewage Treatment Works to discuss the potential odour impact. Please clarify</p>	<p>The design capacity has now been revised to 5,000 cubic meter per day as a more reasonable estimation.</p> <p>At this stage, we could anticipate the key odour sources from the sewage treatment sludge, chemical input for the treatment, and the treatment process, with probably the potential impact on nearby air</p>

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		<p>whether there is any chimney emission from the proposed STW.</p> <p>(c) Please mark the location of the proposed STW in this Environmental Assessment instead of referring to another submission.</p>	<p>sensitive receivers (ASRs). Referring to AEIAR-207/2017, regular removal of the sludge cake and cleaning of sludge holding tank should be adopted by the project team. In addition, odour monitoring system should be set up to minimize the odour impact during the operation of the STP. Especially, exhaust air flow rate, temperature of exhaust, odour emission rate of the deodorization systems should be monitored. Weekly monitoring of odour emission at the exhausts by taking odour samples is recommended to be conducted in the first two months of the first year of the operation in reference to AEIAER-207/2017. Frequency of odour monitoring should not be reduced unless long term full compliance is observed.</p> <p>There is no chimney emission from the proposed STP as advised by the project team. However, further information on this issue could be provided to EPD and DSD review at detailed design stage.</p> <p>The location of the STP has been shown at Figure 4-2 in the revised report.</p>
		<p>5. Figure 2-1 and 2-4</p> <p>The air sensitive receivers (ASRs) of the proposed developments should be represented by the points which are nearest to the emission sources. Please amend.</p>	<p>The location of ASRs of the proposed developments has been moved to the point that is closer to the nearby roads.</p>

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		6. Figure 2-3 Please show the names of the roads in this figure.	The location of ASRs of the proposed developments has been moved to the point that is closer to the nearby roads.
		7. Response-to-Comment (9) It is noted that Hai Wing Road would be intercepted during construction stage. Please clarify whether Hai Wing Road on the eastern side of the proposed development will re-open during the operation stage.	Road name has been added to Figure 2-2 buffering distance of identified major road.
		8. Please delete P. 2-15 to 2-17 if they are blank.	We here clarify that the eastern side will be intercepted by the boundary of proposed residential development and will become a dead end.
		<p><u>Waste Management and Land Contamination Perspective</u></p> <p>9. Response-to-Comment (16) – Section 5.1.1</p> <p>(a) The Consultant shall confirm whether the Project involves the removal of structures constructed before the mid-1980s. If affirmative, please clarify whether asbestos-containing materials are anticipated during site clearance. The Consultant shall address and evaluate such issues and is advised to review whether mitigation measures and good practices would be properly implemented for the handling and disposal of asbestos-containing materials. Please supplement the relevant information and outline the reference materials for further review.</p> <p>(b) The Monitoring of Solid Waste in Hong Kong 2022 has been</p>	<p>(a) Referring to the aerial photo record, majority of the structures within site area were constructed in 1990s.</p> <p>During the previous site inspection, evidence of ACM usage was not found. Nonetheless, thoroughly assessment of ACM will be conducted in the detailed design stage to confirm whether ACM is present within site area.</p>

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		<p>published in December 2023. The Consultant is advised to refer to the latest information in the quantity estimation. Please share the calculation for further vetting and review.</p>	<p>(b) The version of Monitoring for Solid Waste has been changed to 2022.</p>
		<p>10. Response-to-Comment (17) – Section 5.3.1</p> <p>(a) Since the site was only partially covered with building structure, the Consultant shall note that site clearance and building demolition are two distinct processes in construction and land development. The former refers to the process of preparing a piece of land for construction or development, which involves clearing the site of any existing structures, vegetation, debris, or other obstacles to make way for new construction. Whereas the latter specifically refers to the act of intentionally destroying or dismantling an existing building or structure.</p> <p>(b) Likewise, site excavation and site formation are related but distinct processes in construction and land development. The Consultant shall note that site excavation refers to the process of removing earth materials, such as soil, rocks, and other obstructions, from a site to shape the land according to the design and engineering requirements of the project. On the other hand, site formation encompasses a broader scope of activities beyond excavation, which involves modifying a site's</p>	<p>We point out demolition and excavation because we estimated that these two construction activities will generate large amount of C&amp;D material and they should be emphasized. Following the concern from EPD:</p> <p>(a) Demolition has been removed from the section to avoid duplication</p> <p>(b) Excavation has been removed from the section to avoid duplication.</p>

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		<p>topography and physical characteristics.</p> <p>(c) The content in the first sentence is duplicated with the second one; please remove it accordingly to avoid confusion.</p>	<p>(c) The first two sentence has been rewritten to avoid duplication.</p>
		<p>11. Section 5.3.3</p> <p>Metals neither decompose nor generate odour; please carefully review and update the definition as appropriate.</p>	<p>Metal is mentioned in this section because it is no-inert material. The wording “generate odour” has been replaced with “corrode” to reflect the degrade of metal.</p>
		<p>12. Section 5.3.7</p> <p>(a) Please elaborate and clarify the meaning of “brownfield operation” to avoid confusion.</p> <p>(b) The Consultant is advised to refer to Figure 5.1 for the locations of (i) Tin Wah House, (ii) the vehicle repair workshop, and (iii) the six warehouses.</p>	<p>(a) The word brownfield operation has been mentioned widely in government paper. It refers to the warehouse, storage, and repair workshop business on site, which is actually a land under residential use and agriculture use.</p> <p>(b) Added a sentence at the last of Section 5.3.7 to make reference to Figure 5-1.</p>
		<p>13. Figure 5.1</p> <p>Please incorporate the site boundary onto the aerial photos for clarity.</p>	<p>The site boundary has been inserted to Figure 5-1 as requested.</p>
		<p>14. Response-to-Comment (18) – Section 5.3.8</p> <p>(a) Please note that the quoted reference source “Estimating and calibrating the amount of building-related construction and demolition waste in urban China” did not develop demolition waste indexes for steel and steel concrete materials but only</p>	<p>The previous study by Chen can be found at <a href="https://oversea.cnki.net/kcms/detail/detail.aspx?dbcode=CJFD&amp;fileame=HJWS200706004&amp;dbname=CJFD2007">https://oversea.cnki.net/kcms/detail/detail.aspx?dbcode=CJFD&amp;fileame=HJWS200706004&amp;dbname=CJFD2007</a>. We used the Estimating and calibrating the amount of building-related construction and demolition waste in urban China as reference</p>

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		<p>referred to a previous study conducted by Chen in 2007 “An exploration of methods for measuring demolition waste generation. Environment and Hygiene Engineering, 15(6), 2-3 (in Chinese)”. The Consultant shall carefully review the original paper and confirm whether the generation rates could be practically adopted in this Study. If affirmative, please append the reference source for clarity.</p> <p>(b) Please clarify the meaning and difference between generation rates and demolition waste indexes to avoid confusion.</p>	<p>because it is an open assess article and it provides a thorough literature review for demolition waste generation rate from different sources published in different years. Since the demolition waste generation rate developed by Chen through downstream study has been picked to calculate the demolition waste indexes for steel and steel concrete structure in China, it should be similarly applicable to this report.</p> <p>In Section 5.3.8, both generation rate and demolition waste indexes have the same meaning. The word “waste index” has been changed to “waste generation rate” to avoid confusion in Section 5.3.8.</p>												
		<p>15. Response-to-Comment (19) – Table 5-1</p> <p>(a) Please review whether the total estimated quantity of demolition waste from Tin Wah House is 226 tonnes or 227 tonnes.</p> <p>(b) Please revise “Tone” to “Tonnes” to avoid confusion.</p> <p>(c) The waste quantity of the eight concerned structures does not sum up to 8,725 tonnes; please review and update as appropriate.</p>	<p>(a) It is estimated to be 226.5343 tonnes, and is round up to be 227 tonnes.</p> <p>(b) Revised to be “Tonne” within Table 5-1.</p> <p>(c) The waste quantities in Table 5-1 are all rounded to whole number for the convenience of display. The calculated values with more decimal places are shown as below:</p> <table data-bbox="1406 1142 1845 1414"> <tr> <td>Tin Wah House</td> <td>226.5343</td> </tr> <tr> <td>Vehicle Repair Workshop</td> <td>554.8760</td> </tr> <tr> <td>Warehouse 1</td> <td>2450.6709</td> </tr> <tr> <td>Warehouse 2</td> <td>1872.9571</td> </tr> <tr> <td>Warehouse 3</td> <td>2354.0008</td> </tr> <tr> <td>Warehouse 4</td> <td>918.3069</td> </tr> </table>	Tin Wah House	226.5343	Vehicle Repair Workshop	554.8760	Warehouse 1	2450.6709	Warehouse 2	1872.9571	Warehouse 3	2354.0008	Warehouse 4	918.3069
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			<table style="width: 100%; border-collapse: collapse;"> <tr> <td style="width: 60%;">Warehouse 5</td> <td style="text-align: right;">157.1616</td> </tr> <tr> <td>Warehouse 6</td> <td style="text-align: right;">190.7960</td> </tr> <tr> <td><b>Total</b></td> <td style="text-align: right;"><b>8725.3036</b></td> </tr> </table>	Warehouse 5	157.1616	Warehouse 6	190.7960	<b>Total</b>	<b>8725.3036</b>
Warehouse 5	157.1616								
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<b>Total</b>	<b>8725.3036</b>								
		<p>16. Response-to-Comment (18) – Section 5.3.9</p> <p>(a) Please review whether steel plates and frames shall be categorized as non-inert C&amp;D material as per the definition presented in Section 5.3.3.</p> <p>(b) Discrepancies in the total quantity of inert C&amp;D materials have been spotted between Section 5.3.9 and Table 5-1. The Consultant is advised to revise the minor deviation for clarity.</p>	<p>(a) The definition of non-inert C&amp;D material has been revised in Section 5.3.3 according to the comments. Metal is classified as non-inert C&amp;D material.</p> <p>(b) The discrepancy is caused by the rounding of numbers. For demonstration:            Non-inert C&amp;D material: <math>554.8760 + 157.1616 + 190.7960 = 902.8336 = 903\text{tonne}</math>            Inert C&amp;D material: <math>226.5343 + 2450.6709 + 1872.9571 + 2354.0008 + 918.3069 = 7822.47 = 7822\text{tonne}</math>            Total: <math>902.8336 + 7822.47 = 8725.3036 = 8725\text{tonne}</math></p>						
		<p>17. Response-to-Comment (20) – Section 5.3.9 &amp; Section 5.3.10</p> <p>(a) The terms “inert construction waste” and “inert demolition waste” have been adopted in Section 5.3.9 and Section 5.3.10 for the broken concrete from existing buildings and waste generated from the removal of paving slabs, respectively. The Consultant shall define their meaning and review whether consistent terminologies shall be used.</p> <p>(b) The response contradicts the content in Section 1.1.1, of</p>	<p>(a) The term “inert construction waste” has been changed to “inert demolition waste” in Section 5.3.9 to keep consistent.</p>						

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		<p>which stating that the redevelopment sites consist of an area of 22,445m<sup>2</sup> comprising various lots in D.D. 83 and the adjoining government land of about 1,358m<sup>2</sup>. Please carefully review and tally the information in this submission. The Consultant shall review and update the calculation or the description as appropriate.</p>	<p>(b) To avoid confusion, the site area description has been modified in Section 1.1.1. The total site area is 22,445 square meters.</p>
		<p>18. Response-to-Comment (21), (26) and (27) – Section 5.3.11 and Table 5-2</p> <p>(a) The Consultant shall note that the site layout and tentative building development plans were not illustrated in Figure 5-1. Please carefully review the content and revise accordingly.</p> <p>(b) Given that there is no available information for us to review the extent and elevation of the proposed development, we reserve our right to offer further comments on the calculation in the subsequent submission.</p> <p>(c) Please revise “m3” and “m2” to “m3” and “m2”.</p> <p>(d) Normally, section drawing would cover the entire floor height (including the slab), perhaps except the lowest floor of the building. The Consultant shall review whether the addition of 0.8m (800mm concrete slab) is reasonable on B1/F of the residential building. Moreover, if an addition of slab is required in the calculation, it seems more appropriate to incorporate such</p>	<p>(a) The layout plan and section plan of proposed development has been added as Appendix I.</p> <p>(b) Noted.</p> <p>(c) Revised as requested.</p> <p>(d) The addition 0.8m is the space reserved for structural elements by the Architect.</p> <p>(e) The 800mm thickness is reserved for structural elements such as beams, column caps, slabs/transfer plate. The wording has been changed back to “thickness of structural elements” for clarify.</p>

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		<p>thickness to B2/F instead of B1/F. Please review whether the current assumption is valid.</p> <p>(e) Considering that the concrete slab thickness in industrial buildings is mostly around 200mm to 300mm, please review whether a slab thickness of 800mm is reasonable in retail and residential buildings.</p>	
		<p>19. Response-to-Comment (21) – Figure 5.2</p> <p>(a) The quality and resolution of the figure are unsatisfactory. The Consultant is reminded to ensure the attachment is readable with no distortion.</p> <p>(b) The Consultant is advised to supplement section drawing and tentative building layout plans to facilitate our further vetting and review.</p>	<p>(a) Figure 5-2 has been removed from the updated report. The basement plan can now be checked as the second page of Appendix I.</p> <p>(b) The layout plan and section plan of proposed development has been added as Appendix I.</p>
		<p>20. Response-to-Comment (23) to (25) – Section 5.3.13 &amp; Section 5.3.14</p> <p>(a) According to Section 7 of the reference source “<i>The Report on Strategy for Management and Reduction of Construction and Demolition Waste in Hong Kong</i>” (Report 6), the quoted information in Table 6 (page 395) is under the section “Specification for upstream estimation of non-inert construction waste composition”. Please carefully review whether the estimated waste volume refers to non-inert C&amp;D wastes or the</p>	<p>(a) Even though the section 7 of Report 8 mainly discusses the estimation of non-inert C&amp;D material, the upstream estimation method is for calculating all construction waste generated from a project. As described in Section 2 and 3 of Report 7, the upstream method utilises a proforma as shown below to calculate the construction waste from each material based on the construction contract specification/bill</p>

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		<p>overall C&amp;D wastes from the sample projects. If it is the former one, the current assumption and calculation would be invalid, and the Consultant is advised to rectify the estimation as appropriate.</p> <p>(b) The second sentence, “<i>This CIC report also reveals that the portion of inert and non-inert C&amp;D waste within construction</i></p>	<p>of quantity and an assumed wastage level, and is not limited to inert or non-inert.</p> <div style="text-align: center;"> </div> <p>(b) By the time when the C&amp;D material sorting survey was conducted, three residential developments with various of building nature at different stage of construction were chosen to generate the statistics.</p> <p>Site A included construction of 2 storeyed house, low rising buildings with commercial podium, clubhouse, and</p>

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		<p>waste is 52.9% and 47.1%, respectively, after studying the on-site sorting statistics of three completed residential development projects”, is confusing. The Consultant shall carefully review the reference report (pages 291 and 292) and evaluate whether it is reasonable to adopt the average number from the three projects with consideration of (i) the nature of construction (i.e., 2-storeyed buildings, low rise or high rise); (ii) the stage of construction during the on-site sorting surveys (i.e., low rise, basement, podium or high rise at the mid or end stage of constructions); (iii) construction works carried out during the surveys).</p>	<p>basement carpark. It is at the end stage of construction period when the statistic was obtained.</p> <p>Site B included construction of high rising buildings, low rising buildings, and five footbridges. It is at the middle stage of construction period.</p> <p>Site C included construction of 2 storeyed house, low rising buildings with commercial podium, clubhouse, and basement carpark. It is at initial to middle stage of construction period.</p> <p>The reasons why the averaging number is adopted are:</p> <ol style="list-style-type: none"> <li>(1) The proposed development consisted of basement carpark, high rising buildings, clubhouse and commercial arcade, which is deviated from building nature of every single site from the CIC report, and is more likely a merged type.</li> <li>(2) Within the report, the C&amp;D material generation during the whole construction period is calculated.</li> </ol> <p>Therefore, taking the averaging statistic will provide a more reasonable result than adopting statistic data from one single site.</p>

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		<p>(c) In addition to the hyperlink to the reference source, please append the relevant information from the reference for clarity and further vetting.</p> <p>(d) Given the doubts and uncertainties on the assumption and reference source adopted, we reserve our right to offer further comments on estimating the quantity of C&amp;D wastes generated from superstructure works.</p>	<p>(c) The CIC report is lengthy and most content within are irrelevant to this EA report. As it is open access to public, it is not necessary to append it.</p> <p>(d) Noted.</p>
		<p>21. Section 5.3.15</p> <p>(a) The daily general refuse generation rate calculation is incorrect (i.e., 0.65kg/person/day x 60 workers = 39kg/day, not 31.7kg/day). Please carefully review the assumption and calculation and update as appropriate.</p> <p>(b) The quantity estimation is in the unit of kg/ tonnes, which shall be a weight unit instead of volume; please revise the last sentence accordingly to avoid confusion.</p>	<p>(a) The calculation has been revised that the general refuse generation rate from the site has been recalculated to be 39 kg/day. Section 5.3.15 and Table 5-3 has been revised accordingly.</p> <p>(b) The word “volume” has been revised to “quantity”.</p>

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		<p>22. Response-to-Comment (17) – Section 5.3.17</p> <p>The Consultant shall confirm whether the Project involves the removal of structures built before the mid-1980s. If affirmative, it is highly possible that asbestos-containing materials are anticipated during site clearance. Please review the relevance of the first sentence of the paragraph and update as appropriate.</p>	<p>Referring to the aerial photo record, majority of the structures within site area were constructed in 1990s.</p> <p>During the previous site inspection, evidence of existence of ACM on site was not found. Nonetheless, thoroughly assessment of ACM will be conducted in the detailed design stage to confirm whether ACM is present within site area.</p>
		<p>23. Response-to-Comment (41) and (45) – Section 5.3.19</p> <p>Discrepancy on the disposal arrangement has been spotted between Section 5.3.19 and Response-to-Comment (45) (i.e., landfill) and response to previous comment (41) (i.e., CWTC), please review and update as appropriate.</p>	<p>It is clarified that ACM would be disposed to landfill upon agreement with EPD.</p>
		<p>24. Section 5.3.21</p> <p>The amount of chemical waste to be generated shall be quantified in the Waste Management Plan (WMP) as part of the Environmental Management Plan (EMP) to be prepared by the Contractor.</p>	<p>Added as the last sentence of Section 5.3.21.</p>
		<p>25. Response-to-Comment (17) – Section 5.3.22</p> <p>(a) Please append the relevant document on the volume-to-weight conversion factor from USEPA for further vetting.</p> <p>(b) There is no Table 5-5 in this submission, please review and</p>	<p>(a) The document can be downloaded at <a href="https://www.epa.gov/sites/default/files/2016-04/documents/volume_to_weight_conversion_factors_memo_04192016_508fnl.pdf">https://www.epa.gov/sites/default/files/2016-04/documents/volume_to_weight_conversion_factors_memo_04192016_508fnl.pdf</a>. We did not append it into the report because only page 6 within is related to the</p>

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		<p>update the document as appropriate.</p> <p>(c) Please note that management options for treatment and disposal for each waste types have not been covered in the entire submission. The Consultant is advised to properly incorporate the relevant measures accordingly.</p>	<p>waste management impact assessment of the report, and other content in the USEPA document may cause distraction.</p> <p>(b) It has been revised to “Table 5-3”.</p> <p>(c) The wording about management options has been removed from Section 5.3.22.</p>
		<p>26. Response-to-Comment (28) to (30) – Table 5-3</p> <p>(a) Please incorporate a footnote to specify the source of the reference of the volume-to-weight conversion factor.</p> <p>(b) Please review and update the quantity estimation as per comments (14), (15), (17), (18), (20) and (21).</p> <p>(c) Please clarify whether the volume-to-weight conversion factor is the same for large concrete with and without reinforcing bars.</p> <p>(d) The summation of the quantity of non-inert C&amp;D materials is incorrect (i.e., 903 tonnes + 562 tonnes = 1,465 tonnes, not 8,384 tonnes); please carefully review the calculation and update as appropriate. The same applies to the volume</p>	<p>(a) The referencing source of conversion factors has been shifted from Section 5.3.22 to the Notes of Table 5-3 as suggested.</p> <p>(b) We have provided justification for the quantity estimation mentioned in Comment 14, 15, 17, 18, 20. We are grateful for pointing out the error of general refuse calculation. Table 5-3 has been updated according to Comment 21.</p> <p>(c) According to the USEPA document, concrete with and without rebar has the same weight-to-volume conversion factor. It is reasonable because the reinforcement ratio for general use of concrete is usually kept below 5% to satisfy ductility requirement in structural design. Typically, reinforcement for slab is usually taken as the minimum ratio 0.13% with high yield steel. The effect of reinforcement bar to weight of concrete is negligible.</p>



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		<p>estimation.</p> <p>(e) The summation of the quantity of inert C&amp;D materials is incorrect (i.e., 7,822tonnes + 2,176tonnes + 66,318tonnes + 1,809tonnes = 78,125 tonnes, not 71,206 tonnes); please carefully review the calculation and update as appropriate. The same applies to the volume estimation.</p> <p>(f) The Consultant shall incorporate the disposal arrangement, outlets and estimated quantities for each type of waste to be generated during the construction phase. Moreover, the Consultant shall also briefly elaborate on the number of dump trucks for each waste category.</p> <p>(g) Information such as the recycling and reuse rates mentioned in the response to previous comments have not been discussed in the main text. The Consultant is advised to review and properly update the section accordingly.</p>	<p>(d) The summary of waste estimation has been revised in Table 5-3. The corresponding dump truck demand estimation in Section 5.3.25 and Section 5.3.28 has been updated accordingly.</p> <p>(e) The summary of waste estimation has been revised in Table 5-3.</p> <p>(f) The disposal/transportation arrangement of inert C&amp;D waste, non-inert C&amp;D waste has been moved to the end of Section 5.3 as Section 5.3.23-5.3.28.</p> <p>(g) The discussion on reuse portion of inert C&amp;D waste has been moved to Section 5.3.24.</p>
		<p>27. Section 5.4.4</p> <p>Considering the dry content of 30%, please clarify the reason for multiplying 100%/30% instead of dividing the calculated weight by 30%. Please review and update the calculation as</p>	<p>Multiplying 100%/30% will get the same result as dividing by 30%. The “×100%” before dividing 30% there is to remove the percentage sign during the calculation.</p>

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		appropriate.	
		28. Section 5.4 Similar to the introduction in Section 5.3, the Consultant is advised to outline the type of waste to be generated during the operation phase for clarity.	Added a Section 5.4.1 to outline all the expected type of waste as suggested.
		29. Section 5.5.4 (a) Please update the total estimated quantity of C&D materials per the comments above.  (b) The Consultant is advised to elaborate on the additional measures to be taken upon the completion of GI works.  (c) Rather than the CEDD, the Consultant shall specify the vetting party of the C&DMMP for clarity.	(a) After revising Table 5-3, the total volume of C&D waste has been recalculated to be 150,162m <sup>2</sup> . No update for Section 5.5.4 is required.  (b) Because the ground condition as well as soil characteristic of the Site is unknown at this stage. We cannot determine the actual excavated material property and detailed approach of reusing inert C&D material. Upon the completion of ground investigation, the project team can optimize the geotechnical design, and investigate further opportunity to maximize reuse and minimize construction footprint.  (c) Has been specified to be Civil Engineering and Development Department Vetting Committee on Construction and Demolition Materials Management.

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		<p>30. Section 5.5.7</p> <p>(a) Please revise the 8th bullet as follows: “The Contractor shall use a trip-ticket system for the disposal of C&amp;D materials to any designated public fill reception facilities <del>filling facility</del> and/or landfill.”</p> <p>(b) Please revise the 11th bullet as follows: “The Contractor shall register <del>apply for registration</del> as chemical waste producer under the Waste Disposal (Chemical Waste) (General) Regulation if chemical waste is anticipated <del>produced</del>. All chemical waste shall be properly stored, labelled, packaged, <del>and</del> collected and disposed of in accordance with the Regulation.”</p>	<p>(a) Bullet point 8 are revised as suggested.</p> <p>(b) Bullet point 11 are revised as suggested.</p>
		<p>31. Section 5.5.10 to Section 5.5.15</p> <p>(a) Please be advised that most of the content in these paragraphs is unrelated to the recommendation of good site practices and mitigation measures on the C&amp;D materials. The Consultant shall relocate them to relevant sub-sections in Section 5.3 as appropriate, particularly on the disposal arrangement and calculation of dump trucks.</p> <p>(b) Please elaborate on the assumption of recycling/reuse rates and targets for inert and non-inert C&amp;D materials.</p>	<p>(a) These sections have been moved to Section 5.3 as requested.</p> <p>(b) We clarify that the 20% reuse rate for inert-C&amp;D material is a target to be achieved in the construction stage rather than an assumption.</p> <p>From the statistics provided in <i>The Report on Strategy for Management and Reduction of Construction and Demolition Waste in Hong Kong</i>, we notice that majority of the non-inert C&amp;D waste are wooden/timber and metal. These materials usually have high recycling rate after</p>

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			appropriate waste segregation and sorting. Therefore, we assumed a 50% recycling rate for non-inert C&D materials.
		<p>32. Section 5.5.12</p> <p>(a) Please revise “public fill bank” to “public fill reception facilities” for clarity.</p> <p>(b) Please specify the assumption on the number of working days per month to facilitate further vetting.</p> <p>(c) The third sentence, “Based on the Assuming a dump truck capacity of 7.5m<sup>3</sup> per trip, the tentative average number of dump truck trips per day could therefore be estimated as 8 trip/day”, is confusing and incomplete; please review and update as appropriate.</p>	<p>(a) Revised in Section 5.3.25.</p> <p>(b) We adopt 30 days/month in the calculation.</p> <p>(c) “Based on the” has been removed from the sentence in Section 5.3.25.</p>
		<p>33. Response-to-Comment (35) – Section 5.5.13</p> <p>Per the response to the previous comment (35), only a small amount of vegetative wastes and waste wood are anticipated during the construction phase, therefore, disposal at Y-PARK is considered unnecessary at this stage. The current arrangement is well noted. Nevertheless, the Consultant shall further explore the possibility in subsequent stages to better utilize the valuable resources. We reserve our comment on the arrangement upon the incorporation of the site boundary into Figure 5-1.</p>	Noted.

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		34. Section 5.5.14 Please clarify the meaning of “on a least weekly basis”.	Accumulation of non-inert C&D waste on site may cause hygiene problem and generate odour after decomposing/erosion. So, the residual non-inert should be transported out of the site to disposal facilities on the frequency of a least once every week.
		35. Section 5.5.15 (a) The total quantity of non-inert C&D materials does not tally between this paragraph (i.e., 12,373m <sup>3</sup> ) and Table 5-3 (i.e., 20,939m <sup>3</sup> ); please carefully review and update as appropriate. (b) Please revise “m3” to “m <sup>3</sup> ” for clarity.	(a) Table 5-3 has been revised according to Comment 21 and 29. (b) Revised as suggested in Section 5.3.28.
		36. Section 5.5.16 Please clarify the general refuse collection and disposal frequency during the construction phase.	The frequency has been specified to be one a day in Section 5.5.10.
		37. Section 5.5.24 The content of this paragraph is unrelated to chemical waste; please relocate it to Section 5.5.17 on the collection and disposal arrangements for general refuse.	This section has been moved after Section 5.5.10 as 5.5.11.
		38. Response-to-Comment (42) – Section 5.5.26 The Consultant is advised to briefly elaborate on the handling arrangements of asbestos-containing materials and control measures to be taken during the collection and disposal.	The handing of ACM is discussed in Section 5.3.17-5.3.20.

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		<p>39. Response-to-Comment (51) – Section 5.5.28</p> <p>(a) The concept of applying less irritating coagulant and flocculant to reduce the severity of accidental spillage is unreasonable and shall not be considered a mitigation measure and good site practice. Please be advised that such measures may lower the treatment efficiency of the wastewater treatment and sedimentation on both the retention time and quality of the wastewater sludge. Most importantly, preventive measures shall be prioritized so that no spillage occurs during the proposed STW's operation.</p> <p>(b) The term “dryness requirement” is confusing; please review whether moisture content shall be referred to instead.</p> <p>(c) Please elaborate on the chlorine application and its causal relationship with domestic waste.</p> <p>(d) The Consultant shall elaborate on the nature and identify of the coagulant and flocculant and explain their correlation with carcinogenic potential as mentioned in the second last sentence.</p> <p>(e) Please elaborate on the collection and disposal arrangement of chemical waste during the operation of the proposed</p>	<p>(a) These sentences have been replaced by measures for preventing and controlling spillage according to the comments.</p> <p>(b) The term “dryness” appeared commonly in DSD papers, describing the degree of dewatering of sludge cake. The word “requirement” has been shifted to avoid confusion in Section 5.5.23.</p> <p>(c) We mentioned it in the previous report because we want to explain that the impact from chlorine is expected to be small. These sentences will be removed from Section 5.5.22 in the updated report.</p> <p>(d) Similar to the sentences questioned in Comment 39(c), the carcinogenic potential of chlorine is mentioned to explained that the impact from chlorine. These sentences have been removed in the updated report.</p> <p>(e) The collection and disposal arrangement of chemical waste during operation of STP has been added to the end of Section 5.5.22.</p>

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		development.	
		<p>40. Response-to-Comment (46) – Section 5.5.29</p> <p>(a) Please clarify whether on-site or off-site treatment of food waste will be adopted during the operation phase.</p> <p>(b) The previous comment has not been duly addressed. Given that about 70% of food waste is generated from the domestic sector, the Consultant shall review and explore the possibility of collecting food waste alongside other recyclables from the proposed residential developments during the operation phase.</p> <p>(c) Please specify the collection and disposal frequency (minimum) for general refuse during the operation of the Project.</p>	<p>(a) Food waste will be recycled off-site.</p> <p>(b) The sentence about food waste in Section 5.5.24 will be replaced by Food Waste Recycling Schemes as it is being promoted by EPD recently.</p> <p>(c) The minimal frequency of once a day has been added to Section 5.5.24.</p>
		<p>41. Section 5.6.1</p> <p>Please clarify whether asbestos-containing materials are anticipated during the construction phase.</p>	<p>We currently cannot find evidence of presence of ACM on site. If ACM are found during the later investigation, then the measures specified in Section 5.3.17-5.3.20 shall be followed.</p>
		<p>42. Section 5.6.2</p> <p>Please clarify whether chemical wastes are anticipated during the operation phase.</p>	<p>Chemical waste may be produced during operation of STP. It has been added to Section 5.6.2.</p>
		<p>43. Response-to-Comment (55) – Section 6.2</p> <p>The previous comment remains unaddressed. In addition to the submission requirements, the Consultant is advised to</p>	<p>Thanks for your constructive comment and suggestion, we have incorporated the methodology for site investigation and the step of</p>

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		<p>elaborate on the method statement for identification and evaluation of the land contamination potential of the site. Please specify that documentary justifications shall be supplemented to substantiate whether there is any potential land contamination issue arising from the past and present land use activities on the proposed development site through desktop review and site survey (e.g., site's land use history, aerial photos, site visit photos, spillage records, potential contamination sources, etc.). Please incorporate the introduction of the assessment approach in Section 6.2.</p>	<p>handling the land contamination at the further stage (if land contamination is demonstrated with evidence) in Section 6.2.2.</p>
		<p>44. Response to Comment (53) – Section 6.3.2</p> <p>(a) The response to the previous comment (56) was irrelevant to the comment; please carefully review and rectify.</p> <p>(b) Please graphically indicate the locations accessible during the site walkover. If further site inspection is required for the inaccessible areas, please review whether site reappraisal will be conducted in the subsequent stage.</p>	<p>(a) In the previous round of comments from EPD, Comment 53 is</p> <p>53. Section 5.5.1 The Consultant is advised to elaborate on the types of waste anticipated during the construction phase.</p> <p>We added a sentence to Section 5.6.1 to summarize the generation of waste during construction phase.</p> <p>56. Response-to-Comment (53) - Section 6.3.2 Please clarify what kind of consents were granted by other landlords within the Project Site.</p> <p>We clarified that the consent of TPO Section 12A rezoning application from Agriculture/Residential (A) to Residential (C) has been granted from other landlords to the planning applicant.</p>



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			<p>(b) The graphical indication of inaccessible are within the development area and surrounding area has been provided in Figure 6-1. Further investigation might be required at previous inaccessible areas to investigate whether land contamination evidence could be obtained within the development area. This further stage investigation should be incorporated into a separated CAP as mentioned above. The implementation of CAP should be further discussed with the project team before the detailed design stage and submitted to EPD for review before the construction commencement.</p>
		<p>45. Response-to-Comment (57), (59), (60), (61) and (62) – Section 6.4</p> <p>(a) The site walkover was incomplete and could not accurately evaluate the land contamination potential of the proposed development site. The Consultant is advised to properly address the previous comments to (i) identify the suspected contamination areas and (ii) determine whether detailed site investigation and the submission of CAP are required in the subsequent stage.</p> <p>(b) According to the site photographic records and historical and current land uses within the project sites, (i) the suspected oil stain (e.g. Photos 2 and 20), (ii) contaminative land use (e.g., vehicle maintenance workshop, open storage yard and lubricating oil tank in Photo 29), (iii) chemical/chemical waste</p>	<p>(a, b, and c) Thanks for your suggestion. A separated CAP should be conducted at further stage and submitted to EPD for review before the construction.</p> <p>(d, f, g, h,i) During our site visit, there is no potential chemical spillage or suspected area of land contamination. However, further investigation will be done and incorporated in the separated CAP for EPD review and approval before construction.</p> <p>(e)What shown in Photo 2 is concrete ground covered by sveral iron plate rather than crack on concrete pavement. Further investigation on the pavement condition will be supplemented when the CAP is prepared.</p>

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		<p>storage areas (e.g., for the fuel-driven machinery) and (iv) suspected chemical containers (e.g., Photos 11, 19 and 21) were identified. The Consultant shall individually evaluate their land contamination potential and determine whether detailed site investigation and the submission of CAP are required in the subsequent stage.</p> <p>(c) It is noticed that some site photographic records were taken on 6 December 2022, which is earlier than the one stated in this paragraph; please review and clarify accordingly.</p> <p>(d) Please carefully review whether the housekeeping conditions shall be identified as “clean” with consideration of the conditions in Photos 3, 4 and 11 in Appendix G.</p> <p>(e) Please review whether the description that the site area is entirely paved with concrete is valid, with consideration of the paving condition as shown in Photo 2 in Appendix G. The Consultant shall also elaborate on the paving condition and whether cracks were identified on the concrete paving.</p> <p>(f) Considering the suspected land use, site conditions and contaminative activities mentioned in sub-comment (a), please thoroughly review whether the conclusion that there was no evidence of potential land contamination issue is valid and reasonable. If not, please specify that detailed SI and submission of CAP will be covered in the forthcoming</p>	

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		<p>assessment stage.</p> <p>(g) Further information and assessment shall be incorporated for the potential off-site contamination sources as identified in the site walkover checklist.</p> <p>(h) Please specify the areas that require further re-appraisals in the subsequent assessment stage.</p> <p>(i) The Consultant is advised to graphically indicate the extent and locations of potential contamination areas that require further and detailed site investigation in the subsequent stage.</p> <p>(j) The responses to the previous comments are generally unsatisfactory; please carefully review and evaluate the land contamination potential within the proposed development site.</p>	
		<p>46. Response-to-Comment (58) and (61) – Appendix G</p> <p>(a) The Consultant is required to supplement sufficient information such as site photographic records and site walkover checklist to substantiate that no potential land contamination sources are identified within and immediately adjacent to the Project Site. The Consultant is reminded to append a locational plan with a clear indication of the location where the photos were taken. Please be advised that all suspected storage areas, warehouses and temporary structures shall be properly evaluated.</p>	<p>(a, b, c, d, e, f): Thanks for your constructive comment and suggestion. Further investigation on land contamination issue with the development area in a separated CAP should be conducted and submitted to EPD for review and approval before the commencement of construction as mentioned above.</p>

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		<p>(b) According to the site walkover checklist, it is stated that lubricating oil is used in daily operations for PME maintenance; please supplement photographic records showing the site and storage conditions.</p> <p>(c) The resolution of the site walkover checklist and some site photographic records are very poor and unreadable (e.g., item 19 of the questionnaire. Please thoroughly check the quality of the submission and the presentation of the findings.</p> <p>(d) According to the site walkover checklist, it was identified that chemicals have been frequently used within the site; please supplement photos and descriptions on the chemical storage areas for clarity.</p> <p>(e) Photo 27 is irrelevant to the storage of lubricating oil; please thoroughly review and update the responses and content of the submission.</p> <p>(f) The responses to the previous comments are generally unsatisfactory; please carefully review and evaluate the land contamination potential within the proposed development site.</p>	
		<p>47. Response-to-Comment (62) – Section 6.4.6</p> <p>(a) The term “background research” remains confusing; please further elaborate on the main text and consider using an alternative description to avoid confusion.</p>	<p>(a) We have inquired the government departments and planning applicant about the past record of chemical spillage and incident. The description of background research has been expanded in the first sentence of Section 6.4.6.</p>

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		<p>(b) The previous comment has not been duly addressed. The finding of no record of valid/invalid chemical waste producers, as enclosed in Appendix I, contradicts the questionnaire taken in the site walkover checklist. The Consultant is advised to confirm whether the project proponent has already been registered as a chemical waste producer under the relevant regulation under Cap.354. Please be advised that there might be a potential violation of the WDO in case contractors or construction companies (with the production of chemical wastes) fail to register as chemical waste producers. Please seek further clarification with the relevant section of EPD and supplement the relevant correspondence for the record.</p> <p>(c) Please elaborate on the response findings from EPD and FSD.</p> <p>(d) Please clarify the meaning of “accidental chemical issues”.</p> <p>(e) Please specify the information the Consultant were requesting from EPD and FSD.</p> <p>(f) Please be advised that FSD only holds information related to the spillage, leakage and storage records for dangerous goods. The Consultant shall specify such information and the response from FSD in the main text for clarity.</p>	<p>(b) At this stage, we have no clear information on the registration by project proponent as chemical waste producer in the past. Further investigation will be conducted to confirm or infirm on the chemical waste producer registration of the project proponent. Such investigation should also be incorporated in the desktop study during the separated CAP study.</p> <p>(c) The finding from the response of EPD and FSD has been added to Section 6.4.6 separately.</p> <p>(d) Accidental chemical issue refers to the chemical handling activities that can cause detrimental impact to the land and human other than the spillage and leakage incident.</p> <p>(e) The information received from EPD and FSD are specified as the last sentence of Section 6.4.6.</p> <p>(f) FSD has confirmed that there is neither record of dangerous goods license, fire incident nor incidents of spillage/leakage were found in connection with the site area. The specified information has been added as the last sentence of Section 6.4.6.</p>

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		<p>48. Response-to-Comment (63) – Section 6.5.1</p> <p>(a) According to the response to the previous comment (63), it is noted that further investigation will only cover the potential off-site contamination sources; please carefully review the extent of site reappraisals and the validity and representativeness of the current assessment.</p> <p>(b) Please note that the current assessment is incomplete and unsatisfactory; please review the level of detail of this assessment and update the first sentence as appropriate.</p> <p>(c) Per the comments above, please clarify whether there is literally no evidence of suspected sources and activities during the site walkovers.</p> <p>(d) The 3rd sentence, “In addition, there will be no change in near further of the current site activities before the demolition for the construction related to the development target”, is confusing; please review and update the sentence as appropriate.</p> <p>(e) The finding of the investigation is currently incomplete; we will reserve our comments on the conclusion of the land contamination chapter in the subsequent submission.</p>	<p>(a, b, and c) At this stage, we have no potential evidence to conclude on the land contamination within the development area. However, as mentioned above, further study with separated CAP should be conducted for EPD review and approval before the construction. At the CAP stage, in-deep desktop study with the development and off-site should be conducted to see whether land contamination evidence exist within the development area.</p> <p>The sentence has been rewritten to avoid confusion.</p> <p>Noted with thanks.</p>

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		<p><u>Water Quality Perspective</u></p> <p>49. Section 4.3.8 Please state the treatment level of the STP. [not yet addressed]</p>	<p>The treatment level has been added in Table 4-3. It is required by EPD Comment 74 on Further Information No.3.</p>
		<p>50. Section 4.4.5 Please elaborate the sewage generated from proposed development during operation will be collected, handled and disposed properly by on-site STP as a mitigation measure. Please state the treatment level of the STP.</p>	<p>Tertiary treatment will be adopted. The effluent discharge standard has been copied from SIA and added as Table 4-3. It is required by EPD Comment 74 on Further Information No.3.</p>
		<p>51. It is noted in latest Response-to-Comment that detailed information on emergency plan, bypass discharge quantity percentage and efficient handling management system will be provided. Please elaborate in appropriate section(s) in the water quality chapter. We will review and provide comments upon receiving the submission.</p>	<p>As mentioned in the previous round of comments, the emergency plan, bypass discharge quantity percentage, efficient handling management system with detailed procedure will be provided at detailed design stage. However, we will elaborate on the emergency discharge arrangement in the water quality chapter as suggested.</p>
		<p><b>Sewerage Impact Assessment Report</b></p> <p>52. Section 3.2.3 and 3.2.5 Inconsistency is noted in Section 3.2.3 and 3.2.5, please clarify if the design capacity of the proposed STP is 3,500 m3/day or 7,000 m3/day.</p>	<p>Please refer to <b>Appendix 2</b> for the revised SIA.</p> <p>The design capacity of the STP will be taken as 5000 cubic meter/day in the revised SIA report.</p>
		<p>53. It is noted that the total sewage generated for this project is 3,005 m3/day, please advise how the design capacity of the proposed STP of 3,500 m3/day is arrived at.</p>	<p>Within the revised SIA, we proposed to use sewage storage facility like sewage reception well of sewage storage tank to provide temporary storage for sewage on site. Supposed that the sewage</p>

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			<p>storage facility can provide retention during the peak hours, the design capacity of the proposed STP can be taken as the same as the ADWF or more. The design capacity of the STP is proposed to be 5000 cubic meter/day in the updated SIA, which is about 66% higher than the ADWF to provide both the capacity to rapidly evacuate the sewage storage facility when necessary and sufficient buffer against potential equipment damage.</p>
		<p>54. Table 3-1, Section 3.2.3 and 3.2.5 In Table 3-1, Section 3.2.3 and 3.2.5, it is suggested to adopt 2.5 for the peaking factor of the proposed STP which is the new Sewage Treatment Works. Please update if applicable.</p>	<p>Noted. The peaking factor of 2.5 will be adopted for the calculation of peak flow. The peak flow is now calculated to be 7513.5 cubic meter/day. This value will be later used for determining the required pump capacity of the discharge system in Section of the SIA and calculate the available capacity of the drainage channel in the DIA report.</p>
2.4.2024	Environmental Protection Department	<p><b>Environmental Assessment Report Batch 2 Comments:</b></p> <ol style="list-style-type: none"> <li>1. Section 3.2.5 The consultant shall note that PN2/93 was replaced by PN1/24. Please review critically and revise accordingly.</li> <li>2. Section 3.2.6 Noise standards from HKPSG Table 4.1 shall be referenced for fixed noise source.</li> <li>3. Table 3-4 As indicated in Appendix 4.2, Chapter 9 of the HKPSG, L90 (1</li> </ol>	<p>Please refer to <b>Appendix 1</b> for the revised EA.</p> <p>We noticed that PN1/24 has been published recently. Section 3.2.5 and Table 3-1 has been revised accordingly.</p> <p>The description about fix noise source criteria in HKPSG Chapter 9 Table 4.1 has been added to Section 3.2.6.</p> <p>As presented in Figure 3-1, the prevailing background noise is measured at intercepting point of site boundary and the two of the</p>



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		<p>hour) should be generally used as a measure of the background noise level. Nevertheless, should the consultant prefer Leq, measurement results may be accepted provided that the consultant can demonstrate that the measured Leq does not significantly affected by extraneous events (avoided or edited out).</p>	<p>access roads to the site, Hai Wing Road and Dao Yang Road. The noise level there is expected to be dominated by the traffic flow from the warehouse operation in site area. The effect of extraneous events is expected to be small.</p>
		<p>4. Section 3.4.2 Reference to IND-TM shall be made for the application of correction for intermittency. Besides, correction for tonality shall also be addressed.</p>	<p>The application of tonality correction and intermittency correction is subject to the acoustic characteristic of the noise source. At this planning application stage, the specification of the mechanical equipment in the proposed development is not yet known. Therefore, we did not apply these corrections to the fixed noise source calculation.  A sentence will be added to 3.4.13 to discuss the consideration on the tonality and intermittency.</p>
		<p>5. Section 3.4.13 No residual noise impact from proposed fixed noise sources shall be planned, please observe the relevant requirements of HKPSG and Noise Control Ordinance.</p>	<p>We clarify that the residual noise impact is not planned. We estimate that the noise impact from the proposed outdoor units will be acceptable if the criteria in Table 3-7 is followed, and the last sentence in Section 3.4.13 refers that mitigation measures can be planned to further reduce residual noise impact. The sentence has been rewritten to avoid confusion.</p>