

Attachment 1

Response-to-Comments Table

Proposed Rezoning of the Application Site from “Green Belt” to “Residential (Group C)1”
Various Lots in D.D. 244 and Adjoining Government Land, Nam Pin Wai, Sai Kung, New Territories
(Planning Application No. Y/SK-HC/7)

Responses to Comments

Comments from Related Departments

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Responses to Comments

No.	Comments	Responses
1.	<p>Environmental Protection Department, Environmental Assessment Division, Assessment and Noise Group, Noise Assessment & Exposure Information(2), dated 18 March and 12 April 2024</p> <p>Comment on Noise Planning Dated 12 April 2024: Road traffic noise</p> <p>1. App.2.1: Discrepancies in mPD levels, i.e. “13.7 v.s. 13.6”, “+16 v.s.+15.6” and “+14.65 v.s. +14.4”, were noted in the drawing of Section CC.</p> <p>Comments on Noise Planning Dated 18 March 2024: Road traffic noise</p> <p>1. S.4.9.4.3: Apart from room size and window opening size, justifications with technical documents shall also be provided to EPD in case there is any variation on configurations of acoustic window such as overlapping length or gap width.</p> <p>2. App.2.1: Please provide detailed mPD levels for each floor in the drawing of Section CC.</p> <p>3. S.4.5.1.1: R-t-C No. 14 mentioned that the traffic flow during AM Peak traffic hours can represent the worst-case scenario. Please state this in the FI/NIA.</p> <p>Fixed noise source</p> <p>4. S.5.1: R-t-C No. 15 mentioned that no major fixed noise source associated with Tsuen Tung Film & TV Ltd adjoining the site is identified during the site survey conducted in Nov 2023. Please state this observation in S.5.1.</p>	<p>Section CC in Appendix 2.1 is amended. Please refer to the revised Environmental Assessment Study in Annex A for details.</p> <p>Section CC in the Supporting Planning Statement and relevant technical assessment reports have also been updated accordingly. Please refer to Annexes B to H for the relevant replacement pages.</p> <p>Noted and supplemented in S.4.9.4.3. Please refer to the revised Environmental Assessment Study in Annex A for details.</p> <p>Noted and supplemented in Appendix 2.1 – Section CC Drawing. Please refer to the revised Environmental Assessment Study in Annex A for details.</p> <p>Noted and supplemented in S.4.5.1.2. Please refer to the revised Environmental Assessment Study in Annex A for details.</p> <p>Noted and supplemented in S.5.1.1.1. Please refer to the revised Environmental Assessment Study in Annex A for details.</p>

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2. Environmental Protection Department, Water Quality Management Division, Water Quality Management Group, Water Quality Impact Assessment and Marine Refuse Management, dated 18 March and 3 April 2024

Comment on Water Quality Dated 3 April 2024:

Technical comment

1. R-to-C Point 2 & S10.6.2: It is noted that the treated effluent from the on-site STP will be ultimately discharged into Ho Chung River, please consider adopting 'Standards for Effluents Discharged into Inland Waters' under TM-DSS. Please amend relevant content as appropriate.

Noted. 'Standards for Effluents Discharged into Inland Waters' under TM-DSS for treated effluent discharge into Ho Chung River will be adopted and supplemented in Section 10.6.2.2. Please refer to the revised Environmental Assessment Study in **Annex A** for details.

Comments on Water Quality Dated 18 March 2024:

Technical comment

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<p>1. R-to-C Point 1(a): It is noted that a secondary level plus disinfection on-site STP is proposed to handle the sewage generated from the proposed development, please provide design manual and relevant details of the STP.</p>	<p>Details of the proposed onsite STP are supplemented in Appendix 10.1 and mentioned in S10.6.2.2.</p> <p>To achieve the standard of acceptance of the treated effluent discharged into the coastal waters of Tolo and Port Shelter Water Control Zones, the on-site STP, subject to subsequent detailed design by specialist contractor, there could be package MBR sewage treatment plant with UV disinfection or equivalent. The on-site STP will be located in underground plant room within the clubhouse building near site entrance as highlighted on Plan 1 of Appendix 10.1. The treated effluent will be discharged to the proposed 525mm diameter stormwater drain to be constructed by the project proponent with downstream connection to Ho Chung River as highlighted on Plans 1 and 2 of Appendix 10.1. The contingency arrangement in the event of operation failure of the on-site STP will be by tankering away of untreated sewage. Detailed design submission should follow the “Guidelines for the Design of Small Sewage Treatment Plants” published by EPD for approval by EPD.</p> <p><i>(This response is superseded as a result of further liaison with EPD. Please refer to our latest response to Comment No. 1 from Water Quality Management Group dated 3 April 2024 above.)</i></p>
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2. R-to-C Point 1(b): Please explain and provide the specific standards to be adopted for the effluents discharged according to TM-DSS.

As the estimated sewage flow (ADWF) from the proposed development during operation is around 32m³/day, the standard of acceptance of the treated effluent discharged into the coastal waters of Tolo and Port Shelter Water Control Zones, Table 7 of the TM-DSS for flow rate > 10 m³/day and ≤ 200m³/day should be adopted. The specific standards to be adopted are extracted from TM-DSS as below and are supplemented as Table 10.3.

Determinand	Flow rate (m ³ /day)	> 10 and ≤ 200
pH (pH units)		6-9
Temperature (°C)		45
Colour (Iovibond units) (25mm cell length)		1
Suspended solids		30
BOD		20
COD		80
Oil & Grease		20
Iron		10
Boron		4
Barium		4
Mercury		0.001
Cadmium		0.001
Other toxic metals individually		1
Total toxic metals		2
Cyanide		0.1
Phenols		0.5
Sulphide		5
Total residual chlorine		1
Total nitrogen		20
Total phosphorus		8
Surfactants (total)		15
E. coli (count/100ml)		1000

(This response is superseded as a result of further liaison with EPD. Please refer to our latest response to Comment No. 1 from Water Quality Management Group dated 3 April 2024 above.)

Other comment/observation

3. R-to-C Point 1(d): Please amend the sentence 'The contingency arrangement in the event of operation failure of the STP will include tankering away of untreated sewage.' and incorporate into S10.6.2.3 which is about contingency measures.

S10.6.2.2 is revised accordingly. The contingency arrangement of tankering away of untreated sewage is added in S10.6.2.3. Please refer to the revised Environmental Assessment Study in **Annex A** for details.

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<p>4. S10.5.1.1: Please include measures under ETWB TC(Works) No.5/2005 in the bullet points.</p> <p>3. Environmental Protection Department, Environmental Assessment Division, Territory South Group, Sai Kung & Tseung Kwan O, dated 6 and 20 February 2024</p> <p>Comment on Sewerage Impact Assessment Dated 20 February 2024: “Appendix B Table B1 Please clarify if the unit flow factor for 'Clubhouse' is 1.58 m³/day. According to Table T-2 'Unit Flow Factors of Commercial Flows and Student Flows' under 'Guidelines for Estimating Sewage Flows for Sewage Infrastructure Planning', unit flow factor for J10 'Restaurants & Hotels' is 1.50m³/day.”</p> <p>Comments on Water Quality Dated 6 February 2024:</p> <p>Technical comment</p> <p>1. S10.6.2.2</p> <p>(a) It is noted that a secondary level plus disinfection on-site STP is proposed to handle the sewage generated from the proposed development, please provide design manual and relevant details of the STP.</p>	<p>Relevant measures under ETWB TC(Works) No.5/2005 have been supplemented. Please refer to the revised Environmental Assessment Study in Annex A for details.</p> <p>According to Guidelines for Estimating Sewage Flows for Sewage Infrastructure Planning Note (3) of Table T-2, the total unit flow generated from an employee in a particular trade is the sum of the unit flow factor of employee and the unit flow factor of commercial activities of a particular trade under consideration. Therefore, the adopted unit flow factor 1.58m³/day for employee in clubhouse = 0.08m³/day (commercial employee) + 1.50m³/day (J10 Restaurant & Hotels).</p> <p>The design manual and relevant details of the STP will be submitted in later detailed design submission stage following the “Guidelines for the Design of Small Sewage Treatment Plants” published by EPD for approval by EPD.</p> <p><i>(This response is superseded as a result of further liaison with EPD. Please refer to our latest response to Comment No. 1 from Water Quality Management Group dated 3 April 2024 above.)</i></p>
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<p>(b) It is noted that treated effluent from the STP will be discharged to Ho Chung River via stormwater drain, please explain and provide the standards to be adopted for the effluents discharged according to TM-DSS.</p>	<p>As regards the standard of acceptance of the treated effluent to minimize pollution, Table 7 of the “Technical Memorandum Standards for Effluent Discharged into Drainage and Sewerage Systems, Inland and Coastal Waters” for Port Shelter Area shall be followed. The above statement has been supplemented in S10.6.2.2.</p>
	<p><i>(This response is superseded as a result of further liaison with EPD. Please refer to our latest response to Comment No. 1 from Water Quality Management Group dated 3 April 2024 above.)</i></p>
<p>(c) Please provide estimated sewage flow (ADWF) from the proposed development during operation.</p>	<p>The estimated sewage flow (ADWF) from the proposed development during operation is around 32 m³/day. The information has been supplemented in S10.6.2.1. Please refer to the revised Environmental Assessment Study in Annex A for details.</p>
<p>(d) Please clarify whether the contingency arrangement in the event of operation failure of the STP e.g. tanker away of untreated sewage. Please provide details of emergency by-pass of the proposed STP, if any and illustrate emergency by-pass in a figure.</p>	<p>The contingency arrangement in the event of operation failure of the STP will be by tanker away of untreated sewage. The above statement has been supplemented in S10.6.2.2.</p> <p><i>(This response is superseded as a result of further liaison with EPD. Please refer to our latest response to Comment No. 3 from Water Quality Management Group dated 18 March 2024 above.)</i></p>
<p>2. S10.1.1.1 - Please include ProPECC PN1/23 'Drainage Plans subject to Comment by the Environmental Protection Department' and ETWB TC(Works) No.5/2005 'Protection of Natural Streams/rivers from Adverse Impacts arising from Construction Works'.</p>	<p>Amended accordingly. Please refer to the revised Environmental Assessment Study in Annex A for details.</p>
<p>Other comment/observation</p>	
<p>3. S10.1.1.2 Table 10.1</p>	
<p>(a) Please review objective of 'Bacteria' item (b) and amend as appropriate.</p>	<p>S10.1.1.2 has been amended accordingly. Please refer to the revised Environmental Assessment Study in Annex A for details.</p>

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<p>(b) Water quality objectives for 'pH' are incorrect. Please amend as appropriate.</p>	<p>S10.1.1.2 has been amended accordingly. Please refer to the revised Environmental Assessment Study in Annex A for details.</p>
<p>(c) Water quality objectives for 'Phenol' and 'Turbidity' are missing. Please add.</p>	<p>S10.1.1.2 has been amended accordingly. Please refer to the revised Environmental Assessment Study in Annex A for details.</p>
<p>(d) Please critically review all water quality objectives according to 'Port Shelter Water Control Zone Statement of Water Quality Objectives (Cap. 358 sub. leg. O)'.</p>	<p>S10.1.1.2 has been amended accordingly. Please refer to the revised Environmental Assessment Study in Annex A for details.</p>
<p>4. S10.3, Table 10.2 & Figure 10.1 - Please include mangrove (coastal protection area), conservation area, water gathering grounds as WSR. Reference can be made to EPD's Centralized Environmental Database.</p>	<p>The concerned discussion and figure have been amended accordingly. Please refer to the revised Environmental Assessment Study in Annex A for details.</p>
<p>5. S10.5.1.1 - ProPECC PN1/94 has been superseded by PN2/23. Please review and update relevant content.</p>	<p>S10.5.1.1 has been amended accordingly. Please refer to the revised Environmental Assessment Study in Annex A for details.</p>
<p>6. S10.5.1 - Please incorporate ETWB TC(Works) No.5/2005 as mitigation measures during construction phase of the proposed development.</p>	<p>S10.5.1 has been amended accordingly. Please refer to the revised Environmental Assessment Study in Annex A for details.</p>
<p>7. S10.5.2.1 - Please amend to 'Sufficient portable chemical toilets and sewage holding tanks should be provided...'</p>	<p>S10.5.2.1 has been amended accordingly. Please refer to the revised Environmental Assessment Study in Annex A for details.</p>
<p>8. S10.6.1.3 - ProPECC PN5/93 has been superseded by PN1/23. Please review and update relevant content.</p>	<p>S10.6.1.3 has been amended accordingly. Please refer to the revised Environmental Assessment Study in Annex A for details.</p>
<p>Comments on Noise Planning Dated 6 February 2024:</p>	

Responses to Comments

<p>9. S.4.5.1.2 & App.4.1- The traffic flow data for Road IDs 17 & 18 in Table 4.2 do not tally with those in App.4.1. Please review thoroughly and make necessary amendment.</p>	<p>S.4.5.1.2 and App. 4.1 have been reviewed and revised accordingly. Please refer to the revised Environmental Assessment Study in Annex A for details.</p>
<p>10. S.4.2 - The minimum predicted road traffic noise level for R12max should be 60.1 instead of 55.7.</p>	<p>Appendix 4.2 has been reviewed and revised accordingly. Please refer to the revised Environmental Assessment Study in Annex A for details.</p>
<p>11. S.4.9.4.1 - EPD issued a new practice note for professional persons on application of INMD (Ref.: PN5/23). Reference could also be made to PN5/23 when assessing INMD as mitigation measures for road traffic noise.</p>	<p>Noted and the reference of PN5/23 has been supplemented in S4.9.4.1 and S4.9.4.2. Please refer to the revised Environmental Assessment Study in Annex A for details.</p>
<p>12. S.4.9.4.3 - Apart from room size and window opening size, justifications with technical documents shall also be provided to EPD in case there is any variation on overlapping length or gap width.</p>	<p>According to the PN5/23 guideline, a minimum relative noise reduction (RNR) of 6 dB(A) is required. The noise exceedance level, which is currently at 76.1 dB(A), can be reduced to a level below the exceedance threshold through mitigation measures.</p> <p><i>(This response is superseded as a result of further liaison with EPD. Please refer to our latest response to Comment No. 1 from Assessment and Noise Group dated 18 March 2024 above.)</i></p>
<p>13. App.2.1 - Detailed mPD levels for each floor are not provided in the elevation plans.</p>	<p>Please refer to the sectional drawing provided in the appendix of the revised Environmental Assessment Study in Annex A for details.</p>
<p>14. App.4.1 - Only AM Peak traffic flow data are included in this submission. Please confirm AM Peak traffic hours can represent the worst-case scenario. There is inconsistent labeling of floors within the EA (i.e. GF, L1 & L2 vs 1/F, 2/F & 3/F) which may cause confusion.</p>	<p>Please note that the traffic flow and percentage of heavy vehicles have been reviewed and identified that AM peak traffic data represented the worst-case scenario.</p> <p>Footnotes are added in Figure 4.4 and 4.6, Table 4.4, Appendix 4.2 and 4.3 to indicate labelling of floors. Please refer to the revised Environmental Assessment Study in Annex A for details.</p>
<p>15. S.5.1 - Please clarify why Tsuen Tung Film & TV Ltd adjoining the site is not identified as an existing fixed noise source for fixed noise sources impact assessment.</p>	<p>Site survey is conducted in November 2023. No major fixed noise source is identified and do not anticipate major contribution.</p>

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<p>16. S.6.1.2.1- EPD issued a new practice note for professional persons on minimizing noise from construction activities (Ref.: PN1/24). Reference should be made to PN1/24 for proposing quieter construction methods and equipment in construction works.</p>	<p>Noted and S.6.1.2.1 has been revised accordingly. Please refer to the revised Environmental Assessment Study in Annex A for details.</p>
<p>Comments on Land Contamination and Waste Management Dated 6 February 2024:</p>	
<p>Technical comment</p>	
<p>17. S.8.4.1.1 - Temporary works area was identified. Please substantiate whether if potential polluting activities have been carried out in the temporary works area and evaluate whether land contamination issue would be expected.</p>	<p>As identified in the site survey, the temporary works area for the Approved Access Road under Planning Application No. A/SK-HC/223 is for site office use only and hence no potential land contamination is anticipated.</p>
<p>Other comment/observation</p>	
<p>18. S.9.1.1.1 - Please review if dumping sediment at sea is required for the project. If negative, please remove the Dumping at Sea Ordinance.</p>	<p>Dumping sediment at sea is not required for the Project and the Ordinance has been removed.</p>
<p>19. S.9.3.5.2 - Please explore whether measures to prevent fly-tipping by utilizing dump trucks equipped with real-time tracking and monitoring devices could be considered. Besides, please also rectify the typo “while.inert” in this section.</p>	<p>The suggested measures of utilising dump trucks equipped with real-time tracking and monitoring devices to prevent fly-tipping has been added. Typo has been amended. Please refer to the revised Environmental Assessment Study in Annex A for details.</p>
<p>Comments on Air Quality Dated 6 February 2024:</p>	
<p>20. S.7.1.1.2 – Please revise the road type presented in table 7.1 as it is inconsistent with TD confirmation in Appendix 4.1. Please also supplement the substantiation for adopting the buffer distance for LD in this section.</p>	<p>As road type, feeder road, is not provided in HKPSG Chapter 9, buffer distance for feeder road is made reference to that for LD for conservative assessment. Footnote has been added in Table 7.1 to explain. Please refer to the revised Environmental Assessment Study in Annex A for details.</p>

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<p>21. S.7.2.1.2-S.7.2.1.2. – Please review whether the concerned Pat Chun Foods & Soys Factory is still operational and update the section accordingly. Besides, other existing residential development located in the vicinity of the chimney identified could not substantiate whether air quality impact would be anticipated, please review.</p> <p>22. S.7.2.2.1 – Please review the location and separation distance of the planned Ho Chung STP from the boundary of the proposed development and review whether it would be relevant from potential air quality impact point of view.</p> <p>23. S.7.2.3.1 – Please clarify whether the proposed sewage plant would be located at ground level or underground with full enclosure. Please also clarify whether odour mitigation measures such as provision of deodorizing units of at least 99.5% odour removal efficiency; locating the exhaust vent as far away from sensitive receiver as possible would be implemented to minimise the potential odour impact.</p> <p>4. Transport Department, NT Regional Office, Traffic Engineering (NTE) Division, Housing & Planning Section, dated 7 March 2024</p> <p>Section 5</p>	<p>The operator of the Pat Chun Foods & Soys Factory has advised the Project Team that the chimneys are not in used and the site is for storage use only.</p> <p>Section on other existing residential development located near the chimneys has been removed.</p> <p>The name of the planned Ho Chung STP has been amended to Wo Mei STP as discussed. Location of the planned Wo Mei STP is provided in Figure 7.2. Its separation distance from the Proposed Development, its odour mitigation measures and review on any potential air quality impacts have been supplemented in S.7.2.2.1. Please refer to the revised Environmental Assessment Study in Annex A for details.</p> <p>The proposed sewage treatment plant will be located at underground which will be full enclosed. Odour mitigation measures such as provision of deodorizing units of at least 99.5% odour removal efficiency and locating the exhaust vent as far away from sensitive receivers as possible would be implemented to minimise the potential odour impact.</p>
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Proposed Rezoning of the Application Site from “Green Belt” to “Residential (Group C)1”
Various Lots in D.D. 244 and Adjoining Government Land, Nam Pin Wai, Sai Kung, New Territories
(Planning Application No. Y/SK-HC/7)

Responses to Comments

	<p>Re. Drawing No. SP-03 and SP-04, it is noted that the ingress route would encroach to the opposite lane. Please review the width of the vehicular access.</p>	<p>The width of the vehicular access of Sites A and B are reviewed. To allow for better vehicle manoeuvring, drop kerbs are incorporated for the vehicular accesses while the width of the vehicular accesses are remained unchanged. Replacement pages to Appendix C and Drawing Nos. SP-03 and SP-04 of the Traffic Impact Assessment report have been submitted in the Further Information on 8 April 2024.</p> <p>The Architectural Plan of the Indicative Scheme of the Supporting Planning Statement and relevant technical assessment reports have also been updated accordingly. Please refer to Annexes B to H for the relevant replacement pages.</p>
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(Last Updated 18 April 2024)