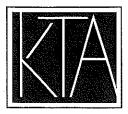
By Email and Hand

Our Ref: S3088_LTTM_23_010Lg

24 July 2024

Secretary, Town Planning Board 15/F, North Point Government Offices 333 Java Road North Point Hong Kong

Dear Sir/Madam.



PLANNING LIMITED 規劃額問有限公司

UNIT K, 16/F, MG TOWER 133 HOI BUN ROAD, KWUN TONG KOWLOON, HONG KONG

九龍觀塘海濱道133號 萬兆豐中心16樓K室

電話TEL (852) 3426 8451 傳真FAX (852) 3426 9737 電郵EMAIL kta@ktaplanning.com

Proposed Rezoning from "Residential (Group B)1" Zone to "Residential (Group B)4" Zone for Medium-Density Housing Development to Include a Footpath for Public Use at Various Lots and Adjacent Government Land in DD130, Lam Tei, Tuen Mun

S12A Amendment of Plan Application –
 TPB Ref.: Y/TM-LTYY/11
 Further Information No. 4

We refer to the captioned planning application submitted to the Town Planning Board ("TPB") on 22 January 2024 and various departmental comments conveyed by the Tuen Mun and Yuen Long West District Planning Office, Planning Department via emails in July 2024.

In response to the departmental comments received, please find attached 4 hard copies of the Further Information ("F.I.") submission. The submission document consists of:

Response-to-Comment Table

Annex A – Revised Traffic Impact Assessment

Annex B – Updated Architectural Drawings

Annex C – Updated Figures in the Supporting Planning Statement

Annex D - Revised Visual Impact Assessment

Annex E - Revised Landscape Master Plan and Tree Preservation and Removal Proposal

Annex F – Finalised Sewerage Impact Assessment

Annex G - Revised Drainage Impact Assessment

Annex H - Revised Environmental Assessment

Meanwhile, should you have any queries in relation to the attached, please do not hesitate to contact the undersigned at 3426 8840. Thank you for your kind attention.

Yours faithfully For and on behalf of

KTA PLANNING-LTD

Glagys Ng

Encl.

cc. the Applicant & Team

KT/GN/vy





Response-to-Comment Table

Section 12A Amendment of Plan Application under Town Planning Ordinance for Proposed Rezoning from "Residential (Group B)1" Zone to "Residential (Group B)4" Zone for Medium-Density Housing Development to Include a Footpath for Public Use at Various Lots and Adjacent Government Land in DD130, Lam Tei, Tuen Mun (TPB Ref.: Y/TM-LTYY/11)

Further Information No. 4

- Response-to-Comments -

	Comments	Our Boononess
Item		Our Responses
	nents from Home Affairs Department	
_	ved on 22 April 2024	
1.	The proposed footpath for public use should be equipped with sufficient	Noted.
	lighting facilities. The developer/ owners should maintain the footpath and	
	the facilities at their own cost.	
Comn	nents of Architectural Services Department	
	ved on 22 April 2024	
2.	Based on the information provided, we have the following comments from	Noted.
	architectural and visual impact point of view for your consideration:	Trottou.
	and an analysis and an analysis of the state	
3.	It is noted that the applicant proposed to rezone the application site form	Noted.
	"R(B)1" to "R(B)4" with the maximum Building Height Restriction of the	
	proposed housing development amended from 35mPD to 107.mPD. As	
	mentioned in our previous memo dated 10 November 2023 to the pre-	
	submission application, it appears from the photomontages enclosed in the	
	submitted VIA that there may be some visual impact to the nearby existing	
	low to medium rise buildings, subject to PlanD's view. The full height of the	
	proposed development should be shown in the photomontages in the VIA.	
4.	To avoid adverse impact on the ventilation and air permeability, the applicant	Noted.
	is reminded to avoid screen wall design and comply with the building	
	separation requirements and the sustainable design guidelines promulgated	
	under PNAP APP-152.	
Comn	nents of Lands Department	
	ved on 3 May 2024	
5.	Re item no.61 of the RtoC, KTA advised there was a typo in "Figure 3.2" of	Noted.
	the Supporting Planning statement and suggested referring to the	
	replacement pages of the SPS enclosed in Annex E. However, "Figure 3.2"	
	could not be found in the replacement pages of the SPS. KTA is suggested	
	again to criticially review the conrrectness of the "total are of 0.93ha" for	
	"R(B)4" zone under the Figure 3.2 of the SPS since under the subject	

Item	Comments	Our Responses
	application, oly the "Development Site" with an area of about 8,896m² but not the "Appkication Site" with an area of about 9,300m² would be used to count for the maximum development potential of the proposed "R(B)4" zone.	
6.	Re item no.62 of the RtoC, the issue under concern is about the western boundary of the "Application Site" has been extended beyond the proposed brown area as shown on the darft-grant plan attached to the Provisional Basic Term Offer issued of the lot owner on 13.6.2023. The application is suggested to review and revise the boundary of the "Application Site".	The Applicantion Site boundary has been revised to only include the proposed Brown Area under in the draft lease plan. Please refer to the updated Architectural Drawings in Annex B and updated figures in the Supporting Planning Statement in Annex C.
7.	Please be advised that previous comments remains valid.	Noted.
	nents of Urban Design and Landscape Unit, Planning Department ived on 3 May 2024	
8.	<u>Urban Design and Visual</u>	
	The Site is located to the north of Tuen Mun New Town, and sandwiched between the elevated MTR Tuen Ma Line and at grade Light Rail track on the east and the nullah on the west. It is mainly surrounded by village type developments, existing/planned private residential developments (including the approved s.12A Application No. Y/TM-LTYY/10 with a maximum BH of 100mPD to its west, the approved s.16 Application No. A/TM-LTYY/426 with a maximum BH of about 64mPD, the Sherwood and Botania Villa with existing BHs up to about 60mPD to its east) and planned public housing developments subject to a BHR of 160mPD to its southwest. In this connection, the proposed development with a maximum BH of 107.8mPD, though would be taller than its existing immediate neighborhood, is considered not incompatible with the planned surrounding environment.	Noted.
9.	According to the submitted visual impact assessment (VIA), most of the seven selected public viewing points (VPs) are in close proximity to the Site. As compared with the approved planning application (No. Y/TM-LTYY/9), the proposed scheme would inevitably have additional visual impacts ranging from slightly to moderately adverse to most of the VPs and significantly adverse to the remaining one VP.	Noted.

Item	Comments	Our Responses
10.	Various design/mitigation measures including tower setbacks, BH variation, provision of replacement footpath for public use, minimized ground floor footprint, peripheral landscaping, etc. are proposed. According to the applicant's response (Item No. 78 of the R-to-C Table refers), the proposed development will comply with the requirements under the Sustainable Building Design Guidelines.	Noted.
11.	Detailed Comments	
	Having reviewed this FI submission, our comments on the replacement pages of the revised VIA (Appendix F refers) are as follows: (a) VP3 – With reference to the revised photomontage (Figure 6.3 refers), the proposed development would appear as a dominant visual component causing substantial obstruction to the open sky view. It would be more appropriate to consider the overall visual impact as "significantly adverse" rather than "moderately adverse" for VP3.	Noted. The overall visual impact rating for VP3 has been revised to "significantly adverse". Please see the reivsed VIA enclosed in Annex D.
	(b) As observations on the VIA, part of the planned public housing development at San Hing Road and Hong Po Road shall be visible in the photomontages at VPs 2 and 3.	Photomontages of VP2 and VP3 have been updated. The photomontages are ecnlosed in Annex D for your information.
	(c) However, the summary of the VIA in Para. 5 above remains generally applicable.	Noted. A full VIA report is attached in Annex D (with Application Site boundary updated) for your record.
12.	To facilitate TPB's consideration on the application, please note below our advisory comments from landscape planning perspective for your consideration:	
	Tree Information (a) After review the tree photos provided in Appendix C 'Photographic Record of Existing Trees', several claimed are not clearly shown in the photos for identification (i.e. T7, T8, T205, T207, T208etc.), the Applicant is advised to review the concerned photos/ species and separate all identified Leucaena leucocephala 銀合歡 from other existing trees in a separate appendix for easy reference.	The Tree Schedule and Tree Photo have been reviewed again, some trees identifications have been rectified (i.e.T7, T8, T135, T157 and T212). As requested, Leucaena leucocephala (銀合歡) in Tree Assessment Schedule and Tree Photo have been separated from other existing trees. Please refer to the revised Tree Assessment Schedule in Appendix B1, B2 and revised Photographic Record of Existing Trees in Appendix C1 & C2 of the Tree Preservation and Removal Proposal in Annex E.

Item	Comments	Our Responses
	(b) Compensatory Tree Plan (Dwg no. CTP-01) — Noting 2 nos. additional new trees are proposed but without providing information in the report, please indicate the proposed new trees on the 'Compensatory Tree Plan' with a separate legend and incorporate the proposed species and size at the 'Tree Planting List' of the drawing.	The 2 nos. of additional proposed new trees information are added to the updated CTP-01 and the TPRP report accordingly (please refer to Annex E).
	(c) Further to our previous comment (i.e. R-to-C Item 105), the Applicant is advised to further explore the opportunity for additional tree plantings to enhance the 1:0.29 compensation ratio in quality (aggregated DBH) for the proposed development, especially at the planter areas along the nullah since sufficient planting areas to allow more tree planting/ trees with larger DBH are observed.	Opportunity of planting more trees would be further explored at detailed stage.
	nents of Drainage Services Department ived on 9 May and 13 May 2024	
13.	Annex B- Replacement pages of the Revised Sewerage Impact Assessment	
	We have no further comment on the submission from sewerage planning point of view.	The 'no further comment' is noted. A full Sewerage Impact Assessment (with Application Site boundary updated) is attached in Annex F for your record.
14.	Annex C - Replacement Pages of the Revised Drainage Impact Assessment	
	Section 2.9.1 (i) Please advise the dimension of proposed stormwater storage tank.	The tentative dimension of the proposed stormwater tank is $8m (L) \times 5m (W) \times 4m (D)$ and is added to Section 2.9.4 (Annex G refers). However, the actual dimension of the proposed stormwater tank may subject to adjustment during detailed design stage.
	(ii) It appears that the location and details of pumping facilities are missing in the layout plan.	The location of the stormwater tank is now shown in B1/F layout plan in Appendix 1.1 (Annex G refers).
15.	Section 2.9.4 (i) Please provide detailed calculation to elaborate the basis of each figure as shown in appendix 2.2.	The adopted safety factors are referenced from the 2019 DIA report for land exchange purpose for the same development site which DSD has no objection.

Item	Comments	Our Responses
		Section 2.9.4 has been revised (Annex G refers).
16.	(ii) Please provide detailed calculation to elaborate the existing peak runoff for 1 in 50yr storm event.	The detailed calculation for estimating the peak runoff for 1 in 50 years storm event is conducted based on the parameters in Table 5a of Stormwater Drainage Manual (SDM) Corrigendum No. 1/2024 and following the approach in the 2019 DIA report. Section 2.9.2 has been revised (Annex G refers).
	Appendix 2.2 (i) Please advise the basis of hydrograph as stated in this Appendix.	The hydrograph is derived based on the parameters in Table 5a of SDM Corrigendum No. 1/2024 and following the approach in the 2019 DIA report.
	(ii) Please provide the detailed breakdown and calculation of stormwater to be stored.	The detailed breakdown and calculation of stormwater to be stored have already been presented in the rows "Excess for Storage (m³/s)", "Storage (m³/min)" and "Cumulative Storage (m³)" of Appendix 2.2 (Annex G refers).
		The stormwater excess for storage per minute is derived by: "Future Runoff derived from Hydrograph" + "Calculated Sewage Peak Flow Including the Backwash of All Swimming Po – "Calculated Existing Peak Runoff (1 in 50 year)".
		By summing up the stormwater excess for storage per minute, the total stormwater to be stored is then obtained.
	(iii) Please elaborate how to tackle the scenario in which the stormwater runoff is greater than that as estimated in this Appendix (e.g. overflow of storage tank).	The calculation has adopted the values in Table 5a of SDM - Corrigendum No. 1/2024. It is understood that the purpose document is to update the parameters of the SDM to cater for intensified storm events (i.e. leading to more runoff) due to climate change.
		Moreover the safety factor mentioned in Section 2.9.4 is also applied to cater for the situation of excessive stormwater runoff in addition to those estimated following DSD's SDM. As the size of the storage tank has taken into account the safety factor, the situation where the storage tank is overflow is unlikely to be anticipated.

Item	Comments	Our Responses
17.	Section 2.2 – RtoC Item 75	
	Please justify the reason of adopting the rainfall increase due to climate change for mid-21st century (2041-2060). Would the proposed development is still in used after 2060? Please also incorporate the latest SDM corrigendum No. 1/2024.	The rainfall increase due to climate change for end of 21st century (2081-2100) has now been adopted. Section 2.2.4 and Appendix 2.1 have been revised (Annex G refers).
18.	Section 2.9 – RtoC Item 75 Please elaborate the assumption and calculation on the assessment of the size of storage tank	The size of the stormwater storage tank is determined based on the estimated excess stormwater runoff which needs to be stored as shown in the calculations in Appendix 2.2 (Annex G refers), such that the discharge to the nearby nullah is no more than that under the existing condition. As mentioned in Section 2.9.2, the hydrographic assessment is conducted by adopting the approach in the 2019 DIA report and with reference to Table 5a of SDM Corrigendum No. 1/2024 and the development parameters of the Proposed Development.
	nents of Environmental Protection Department ved on 5, 8 and 11 July 2024	
	Air Quality (Air assessment)	
19.	Section 5.3.2. Suggest to replace "from the perspective of the HKAQOs" by "of the respective AQOs"	Section 5.3.2 has been revised (Annex H refers).
20.	Section 5.3.3. Please revise the first sentence noting that there is no 5-year arithmetic mean of the ambient air quality levels shown in Table 5.4.	Section 5.3.3 has been revised. "5-year arithmetic mean" has been removed from line 1 (Annex H refers).
21.	Section 5.3.4. Suggest to remove "in perspective" in Line 2 or clarify in which perspective the statement refers to.	Section 5.3.4 has been revised accordingly. "In perspective" has been removed from line 2 (Annex H refers).
22.	Section 5.4.3 and R-t-c 5. Suggest to revise the first sentence as: Air sensitive uses of the proposed development, with residential dwellings at the five towers, open space for passive/ active recreational uses and the clubhouse, are air sensitive receivers.	Section 5.4.3 has been revised (Annex H refers).

Item	Comments	Our Responses
23.	Section 5.5.2. Please replace "dust impact" by "air quality impact" in the last sentence.	Section 5.5.2 has been revised (Annex H refers).
24.	Section 5.5.3 and R-t-c 7. Please supplement the response to Section 5.5.3: Apart from the planned public housing development at San Hing Road and its associated infrastructure works, there is no other concurrent projects within the 500 m assessment area identified with reference to the records on the OZP portal and EIAO website.	Section 5.5.3 has been revised. The response has been supplemented in Section 5.5.3 (Annex H refers).
25.	Section 5.5.8. One site visit is not sufficient to verify if there is no joss paper burning activities at Miu Fat Buddhist Monastery. Please check with the owner/management of the Monastery to confirm if there is no joss paper furnace or carry out site visits during the special festivals/events such as Ching Ming festival, Chung Yeung festival and Buddhism Birthday, etc. to confirm if there is no joss paper burning activities. Suggest to revise the last	During the site visit in March 2024, staff from the management office of the Monastery confirmed that the burning of joss paper is not practiced in the premises and the policy remains effective at all times. Section 5.5.8 has been revised (Annex H refers).
	sentence as: Adverse air quality impact from the Miu Fat Buddhist Monastery on the proposed development is thus not expected.	
26.	Section 5.5.12. Suggest to replace "from 4km of the Project" by "within 4 km from the Project" in the title and revise "existing asphalt plant at Lam Tei Quarry" in the last sentence to "Lam Tei Underground Quarry".	The title of Section 5.5.12 has been revised to "Major Air Emission Sources within 4km from the Project".
27.	Section 5.6.4 and R-t-c 10. Please follow up to obtain TD's endorsement on the traffic data for assessment and supplement in the Appendix. Please state	TD's endorsement will be provided once obtained.
	clearly if the new road network is included in the worst case assessment year for assessment.	The road network of Year 2033 (including the new road network due to the nearby public residential housing development) has been considered in the worst case assessment year for assessment.
		Section 5.6.4 is revised (Annex H refers).
28.	Section 5.6.19 - Please remove "and assumed" in Line 1 - Apart from May 2023, please supplement that site surveys were also conducted in January and March 2024 for identification of industrial chimneys as mentioned in Section 5.5.7	Section 5.6.19 has been revised. Site visits were conducted in May 2023, January 2024, and March 2024.

Item	Comments	Our Responses
29.	Section 5.6.24. Please state clearly if there is any under-estimation by using broadbrush approach to estimate the emissions of taxis and LPB from the bus terminus in the text.	Section 5.6.24 has been revised (Annex H refers). The broad-brush approach is a conservative approach which will not cause any underestimation of the start emissions of taxi and PLB.
30.	Section 5.6.27. The meaning of "post-processing NOx to NO/NO2 is not required" is unclear. Please clarify whether the ozone limiting method or Jenkins method have been applied for the atmospheric chemistry of	Ozone limiting method has been applied to the atmospheric chemistry of conversion from NO to NO_2 . "Post-processing NO_x to NO/NO_2 is not required" has been removed from the text.
	conversion from NO to NO2. Please note that even though NO and NO2 are modelled separately in AERMOD for the atmospheric dispersion, the atmospheric chemistry of conversion from NO to NO2 need to be accounted for otherwise there would be under-estimation of the NO2 emission impact.	Section 5.6.27 to Section 5.6.31 have been revised to include the details of the ozone limiting method (Annex H refers).
31.	Section 5.6.30. Please clarify whether "data" in Line 1 refer to "background concentration" and suggest to replace "data" by "background concentration"	Section 5.6.30 has been reordered as Section 5.33. Section 5.6.33 has been revised accordingly (Annex H refers).
32.	Section 5.8.1. Please supplement "and Air Pollution Control (Construction Dust) regulation" after "Recommended Pollution Control Clauses for Construction Contract issued by the EPD" in Line 4.	Section 5.8.1 has been revised accordingly (Annex H refers).
33.	Section 5.8.5. Please supplement that the sewage treatment plant shall be enclosed and maintaining negative pressure by the ventilation system in the STP enclosure	Section 5.8.5 has been revised accordingly (Annex H refers).
34.	Appendix 5.2. Please show the road links with start and without start emissions in different colors.	Appendix 5.2 has been revised (Annex H refers). Roads with start emissions are shown in magenta while roads without start emissions are shown in dark green.
35.	Please highlight all the changes/amendments in the next submission.	Noted, changes have been highlighted.
	Noise [General Comments/ Major Issues]	
36.	Railway Noise Assessment Table 2.3 item 4 Reference is made to "Equation 15.21 in E". Please clarify this reference.	The reference has been revised to "Equation 15.21 in (4)".

Item Comments

37. The circled figure showed that solid parapet correction was applied between some NSRs and the West Rail Line Track/ Light Rail Track. Please provide more information, if there is any solid structures between the track and NSR, and it should be showed clearly in all figures (pointing out with suitable legend).



38. For T5_RN01, only track segment LN9, LS9, partial WN10, WS10 was shown in Fig 2.2. Please provide a clear figure to show the relationship between T5_RN01 and all mentioned track segments in the sample calculation worksheet.

39. Appendix 4.1, the traffic forecast data is for Year 2033, while in Section 4.2.1, the projected traffic year is in year 2045, please confirm which year is adopted for road traffic noise assessment and check the traffic data input in noise model.

Air Model Comments

- 40. **PTI AERMOD Model:** Please estimate both the release height and initial vertical dimension of the running emission sources outside bus terminus (e.g. FTEAS101 to FTEAS208 and SHEAS01 to SHEAS07) according to the Technical Note for Modelling Vehicular Emissions Using AERMOD Section 2.2.3 and rerun the model.
- 41. **Road AERMOD Model:** Following comment 35 (i), the release height for roads along L111 to L111_3 shall be adjusted to the <u>2m</u> planned vertical noise barrier tip although the barrier is outside 3m mixing zone. Please update and rerun the model.

Our Responses

The location of solid parapet and full enclosure for TML and LRT have been added to Figures 2.1 and 2.2. With reference to the information in the West Rail Operational Train Noise Assessment Report and EIA Report for Development of San Hing Road and Hong Po Road, Tuen Mun (AEIAR-227/2020), solid parapet with a height of 1.2m has been assumed for all TML segments and some LRT segments within the assessment area.

Please find the sample calculation worksheet of T5_RN01 in Attachment A.

The typo in Appendix 4.1 has been revised, the traffic forecast data adopted is Year 2045 which tallies with Section 4.2.1. As the traffic data provided by the traffic consultant has been revised, the traffic noise prediction has also been updated.

The release height and initial vertical dimension (Szinit) have been revised according to Section 2.2.3 of the Technical Note for Modelling Vehicular Emissions Using AERMOD. The air model has been revised.

The release height for roads L111 to L111_3 have been revised to consider the 2m planned vertical noise barrier which is outside the 3m mixing zone. The release height has been updated in the AERMOD input file.

Item	Comments	Our Responses
		Moreover, with reference to the gazetted plans of "PWP Item Nos. B764CL and B861CL", the 5.5m+3.5m cantilevered noise barrier along eastbound Hong Po Road is now removed from the assessment and the air model has been rerun.
42.	Annex A EA Report Appendix 5.6 Emission Inventory for AERMOD Model: The presented x, y of source FTEAS207 does not tally with model. Please revise the typo.	Noted. Appendix 5.6 has been revised. The typo of source FTEAS207 now tallies with the air model.
43.	Annex A EA Report Appendix 5.3: Comment 34 is not addressed. Please present the road elevation, release height, width, initial vertical dimension and the emission rates <u>in the AERMOD input file</u> instead of the input values to SAMP for checking.	Appendix 5.3 has been revised to include the road elevation, release height, width, initial vertical dimension and the emission rates of the AERMOD input files.
	nents of Transport Department ived on 22 April 2024	
44.	Figure 2.1 - L2 (Castle Peak Road - Lingnan), L3 (Yuen Long Highway) and L4(Tuen Mun Road) should be covered in AOI.	Noted and revised in Figure 2.1 in revised TIA.
45.	Figure 2.14 and 4.2 to 4.4 - Flows at L2, L3 and L4 should be provided.	Existing and Year 2033 link flows are presented in Figures 2.15 and 4.8 in revised TIA.
46.	Section 2.9 - Please state clearly (i) the date/period of the road link survey conducted. The consultant should adopt the ATC figures, if available.	Manual classified surveys for junction and road link were conducted at 0700 – 0900 and 1700 – 1900 hours, on Tuesday, 18 th April 2023, Wednesday, 19 th April 2023, Wednesday, 26 th April 2023 and Wednesday, 8 th May 2024.
		In view that the latest Annual Traffic Census ("ATC") has traffic information for up to 2022, when the traffic flow is affected by the COVID-19 pandemic, we have not adopted the latest ATC figures.
		However, year 2024 traffic flows obtained from the traffic survey reflect the normal condition, i.e., after the COVID-19 pandemic. Hence, the traffic flows from the survey is adopted.
47.	Table 2.2 (2023 base year) Please state whether the traffic demand is based on traffic survey, ATC or modelled data.	Please be advised that the traffic demand is based on traffic survey.

Item	Comments	Our Responses					
48.	Please provide the calculation for the Adjusted Design Flow of road links (e.g. 4,371 veh/hr, 2,604 veh/hr and 1,767 veh/hr). Adjusted Design Flow of the L3 Yuen Long Highway (S/B) in AM peak (i.e. 4,700 veh/hr) and PM peak (i.e. 4,462 veh/hr) should not be different.	Volume 2 of TPDM, the design flow should be reduced when the			when the table below		
		Road Type	Design			low (veh/hr)	
			Flow (veh/hr)	0%	7%	20-25 HV% 10%	
		Expressway / trunk road (Dual 3 lanes – 11m-wide)	4,700	4,700	4,371	4,230	
		Primary Distributor (Dual 3 lanes – 7.3m-wide)	2,800	2,800	2,604	2,520	
		District Distributor (Single 4 lanes – 13.5m-wide)	1,900	1,900	1,767	1,710	
		Local Roads (Single 2 lanes)	800	800	744	720	
		Based on the updated traffic been updated in Tables 2.3 In view that the HV% are reduction of design flows ar	3 and 4.10 different ir	of revised a	TIA (Anne and PM p	x A refers).	
49.	It may not be convincing that the traffic demand of L4 (Tuen Mun Road) to SB direction (i.e. 4,360 veh/hr) is less than NB direction (i.e. 4,821 veh/hr) in AM peak.	Traffic survey for Tuen Muconducted on Wednesday, updated in Table 2.2 of revi	8 th May 2				
50.	Section 2.10 Please note that a v/c ratio equal to or less than 1.0 indicates that a road has sufficient capacity to cope with the volume of vehicular traffic. Thus, L3 (Yuen Long Highway) with a v/c of 1.02 also does not operate with sufficient capacity.	Ditto.					

Item	Comments	Our Responses
51.	L3 (Yuen Long Highway) & L4 (Tuen Mun Road) with V/C ratios at 1.02 and 1.24 during peak hours in base year 2023 look too high.	Ditto.
52.	<u>Table 4.9 & Section 4.22 (2033 design year)</u> Some Adjusted Design Flows shown in Table 4.9 are slightly different to those shown in Table 2.2 (e.g. L3 and L4).	Based on the revised traffic survey for Tuen Mun Road, adjusted design flows have been revised and updated in Table 4.10 of revised TIA.
53.	V/C of L3 and L4 at 1.36 and 1.59 during peak hours in design year 2033 look too high, even under "without Proposed Development" scenario.	Based on the revised traffic survey for Tuen Mun Road, year 2033 traffic data have been revised and updated in Table 4.10 in revised TIA.
54.	should reassess the v/c ratio of L3 and L4 in the year 2033 under the "without development" scenario and provide additional information, such as estimated number of pcu generated from and attracted to the proposed development, the v/c ratio of L3 and L4 after the implementation of the planned strategic road improvement works (such as Route 11, Tuen Mun Bypass, and the	As shown in Table 4.10 in revised TIA, the Proposed Development and Year 2033 with Proposed Development has negligible traffic impact to L3 and L4 in year 2033.
		It is found in LC paper no. CB(4)619/20-21(03) of Legislative Council Panel on Transport that the planned Route 11 would reduce v/c in Year 2036 from 1.2 to 1.0 at Tuen Mun Road (Siu Lam Section) in morning peak, which indicates the traffic congestion at Tuen Mun Road will be relieved by planned Route 11.
		In addition to the above, other strategic road improvements, including, Tuen Mun Bypass and Yuen Long Highway (between Lam Tei and Tong Yan San Tsuen) are planned to be implemented. The traffic condition at L3 and L4 would be further improved by these planned strategic road.
	nents of Transport Department ived on 24 May 2024	
55.	About 1/3 of the traffic generated from the proposed development is assumed to be diverted to Ng Lau Road northbound and the remaining 2/3 to Lam Tei Interchange. The assumed split does not reflect the actual condition where the traffic from the nearby unnamed road all go to Lam Tei Interchange. As Lam Tei Interchange provides the most direct route to strategic road network, we consider most of the traffic from/to the development will use Lam Tei Interchange.	The distribution of Approved Scheme and Proposed Development have been revised and presented in Figures 4.2 and 4.3 in revised TIA respectively (Annex A refers).

Item	Comments	Our Responses
56.	The calculation of Lam Tei Interchange (J5) and Tsing Lun Road/ Hong Po Road/ Lam Tei Interchange (J4) in Appendix A did not include all flows to these roundabouts.	Please be clarified that traffic flows using exclusive left turn lane have been excluded from junction capacity analysis. The junction capacity assessment have been updated in Appendix A of revised TIA (Annex A refers).
57.	LOS assessment of footpath refers. Footpaths along San Hing Road and Ng Lau Road should also be considered.	Footpaths along San Hing Road and Ng Lau Road have been assessed and presented in Tables 2.8 and 6.2 of revised TIA (Annex A refers).
58.	Figure 2.14 refers. The surveyed traffic flow in Apr 2023 is relatively low compared with TIA reports for other development projects in vicinity. Please review. In particular, the traffic condition of junctions near Lam Tei Interchange is of prime concern of residents in Tuen Mun District. Please check if the junction assessments are under-estimated.	The manual classified survey date for junction and road link were reconducted on Wednesday, 8 th May 2024. The traffic flow is updated in Figure 2.14 in revised TIA. The junction assessments are updated and presented in Table 2.1 in revised TIA (Annex A refers).
59.	 Table 4.3 refers. (i) Please clarify how the traffic impact of Site 4A (East) and 4A (West), which become LPH sites, is incorporated into your assessment. (ii) NOVOLAND has its population intake since 2023. 	(i) The traffic generation rate of subsidised housing with average flat size of 40m² in TPDM is adopted to estimate the traffic generation of Light Public Housing (LPH) at Site 4A (East) and 4A (West). The traffic generation of the LPH is distributed with similar traffic pattern of the developments in vicinity.
		(ii) According to the sales info, some 1,500 and 1,650 were occupied starting June 2023 and May 2024 respectively. In the 2033 traffic flows, all 4,600 flats in NOVOLAND and its retail facilities are assumed to be occupied.
60.	Sect 4.6, 5 and 6 refer. The annual average growth rates of population adopted between 2024 to 2033 are much lower than those adopted in the TIA reports for other development projects in Tuen Mun District. Please review.	In view of the number of planned / committed developments and road improvement works found in the vicinity between 2024 and 2033, it is more appropriate to use the Base District Traffic Model ("BDTM"), which has traffic flows for 2019, 2026 and 2031, to prepare the 2033 traffic flows. To produce the 2033 traffic flows from 2031, the population growth of Hong Kong has been adopted.
		To demonstrate that the 2033 traffic flows produced are conservative, i.e., on the high side, the traffic flows of major roads in the Area of Influence for 2 scenarios are compared in the Table below.

Item	Comments	Our Responses						
		Major road links in the area of influence (2-way)	/ hour)				Growth from 2024 - 2033	
		Tuen Mun Road	10,338	10,057	13,882	13,725	3.3%	3.5%
		Yuen Long Highway	9,035	8,838	12,184	12,048	3.4%	3.5%
		Castle Peak Road – Lam Tei	2,836	2,719	3,469	3,477	2.3%	2.8%
		Ng Lau Road	329	424	805	820	10.5%	7.6%
		Tsing Lun Road	1,610	1,386	2,504	1,893	5.0%	3.5%
		Lam Tei Interchange Total	2,612 26,760	2,267 25,691	4,246 37,090	3,446 35,409	5.5% 3.7%	4.8% 3.6%
61. 62.	In addition, apart from the quoted sources stated in Sect 5.2, please also make reference to ATC and TPEDM to acquire appropriate growth rates for the traffic forecast. Table 4.4 refers. J7 is to be carried out by another CEDD Contract No. CV/2019/04 instead of CE 39/2021 (CE).	area are 3.7% and ATC does not providemand growth an not reflect the local Noted and updated	ide inforn d pedest conditio	nation to rian grov n, hence	predict p wth. The e, this is r	oublic tra TPEDM not used.	nsport pa informat	assenger ion does
63.	Tables 4.5, 4.6 and 4.7 refers. The adopted traffic generation and attraction rates are expressed in terms of pcu/hr. Whereas, your link capacity assessments are conducted in terms of veh/hr which is not comparable.	The traffic generati 4.5 - 4.8 of revised				been pre	esented ir	n Tables
64.	Table 5.4 refers. Some of the figures are incorrect.	Noted and updated in revised TIA (Annex A refers).						
65.	Sect 5.14 and 7.6 refer. Without detail assessment, your conclusion of sufficient public transport provided in nearby developments to support the proposed development is not justified.	Noted. Public trans revised TIA (Annex			ssment is	s found ir	n Chapte	r 5 of the
66.	Sect 5.16 refers. Please clarify if "2033 with the Proposed Development" should also include the net increase in traffic generation in Table 4.7. To avoid confusion, it is suggested to supplement a table showing the total additional trip rates applied on the existing scenario, the approved scheme and the new scheme as easy reference.	Additional bus trip presented in Table						

Item	Comments	Our Responses			
67.	Table 6.1 refers. (i) Please clarify how these figures are derived from.	(i) The peak 15-mins pedestrian generation in Table 6.1 is derived by applying peak hour factor of 33% to the peak hour public transport demand of Approved Scheme and Proposed Development.			
	(ii) Please also present the adopted trip rate of the pedestrian generation and attraction by the proposed site in unit of ped/hr/flat. In addition, please justify the reasonableness of the adopted trip rate by comparing with other private developments of similar scale and locations.	(ii) The pedestrian generation rate is presented in Table 6.1 of revised TIA. In-house pedestrian survey of COO Residence (8 Kai Fat Path, Tuen Mun), which have similar average flat size and travel characteristic (100m to Pui To LRT stop), is referred. The pedestrian generation and pedestrian generation rates in ped/ flat /hour is shown in Table R2C1 .			
		TABLE R2C1 COO RESIDENCE PEDESTRIAN GENERATION AND PEDESTRIAN GENERATION RATES			
		COO residence (204 Flats, avg. flat size of 30 m²) Parameter AM Peak PM Peak Generati Attractio Generati Attractio on n on n			
		Pedestrian Generation ped / hour 37 5 10 25 Pedestrian Generation rates ped / flat / hour 0.1814 0.0245 0.0490 0.1225 0.2059 (2-way) 0.1716 (2-way)			
		The above table shows that COO residence are having pedestrian generation rates of 0.2059 and 0.1716 ped/flat/hour (2-way) during AM and PM peak, which is comparable to the adopted pedestrian generation rate of 0.2189 ped/flat/hour (2-way) in both AM and PM peaks as shown in Table 6.4 of revised TIA (Annex A refers).			
68.	Sect 7.5 refers. Vehicular trip rates of public transport service is omitted.	Additional bus trip has been updated in Paragraph 7.5 in revised TIA (Annex A refers).			
69.	Please supplement a figure in the report showing the total trip generation and attraction of the development in the AOI, arising from the TPDM trip rates and the additional public transport demand.	The traffic generation of the Approved Scheme and Proposed Development is shown in Figures 4.2 and 4.3 respectively in revised TIA. Year 2033 proposed additional bus trips is shown in Figure 4.4 in revised TIA (Annex A refers).			
70.	The assessment of justifying the need of shuttle service should also be presented.	Based on the public transport assessment result, it is concluded that it is <u>not necessary</u> to provide shuttle bus service.			

Item	Comments	Our Responses
71.	Comments from BRB Para 2.14, 2.15 and Table 2.5 refer. Please note there is updated operation performance for Tuen Ma Line in 2023: (https://www.tlb.gov.hk/eng/legislative/transport/special/land/TLB-2-e1.pdf)	Noted and updated in revised TIA (Annex A refers).
72.	Comments from TONT Table 2.3 refers. The headway/frequency of CTB 50, 56, 56A, 950, KMB 960P, 960X, N260, LWB A34, NA33 and NLB B2 are not correct. CTB N50 is missing.	Noted and updated in revised TIA (Annex A refers).
73.	Para 2.12 refers. Appendix B has no detail information regarding the survey result given. Please advise the survey result in respect of each routes.	AM and PM peak hours and survey location and of each bus / GMB route has been presented in Appendix B of revised TIA (Annex A refers).
74.	Chapter 5 refers. Under the chapter 5 of the revised TIA, there is no clear indication if the residents will make use of the public transport services in the vicinity of the development. Assuming that the residents will take LRT and franchised bus services, the consultant should conduct an assessment on the capacity of public transport facilities (e.g. passenger waiting/queuing areas at bus stop /LRT platform and length of the laybys for bus/GMB)? Please elaborate the assessment and recommended enhancement in a new section.	The modified transport mode of the Proposed Development is presented in Paragraphs 5.1 – 5.3 of revised TIA (Annex A refers). The review of public transport facilities capacity is conducted in Chapter 5 of revised TIA.
75.	Regarding the residents who would take rail-based transport (44%), the consultant should advise the estimated proportion/% passenger taking LRT or other feeder services (e.g. bus/GMB) to the nearby railway station i.e. Siu Hong Station and assess the impact to LRT/other feeder services and ascertain if any enhancement of services would be required.	In view that the LRT services are provided at only 50m from the Proposed Development, it is assumed that 100% of the residents who use MTR would use LRT services to MTR station. The assessment has been provided in Paragraph 5.22 of revised TIA (Annex A refers).
76.	Table 5.4 refers. The population under "approved scheme" and "proposed development" shall be 799 and 3601? Subject to the updates to the population / relevant proposed PT services, sufficient PT facilities should be provided to support the operation of the proposed bus/GMB service	Typo. The population of Approved Scheme and Proposed Development are 799 and 3,601, has been updated in revised TIA.

Item	Comments	Our Responses
77.	Please advise the calculation D=AxBxC under "estimated peak hour mechanized trip generation".	Typo. The calculation should be "F= C x D x E" and has been updated in revised TIA.
78.	For remark ⁽²⁾ and ⁽³⁾ , there is no table 3.3 and Para 3.3.7 in the report.	Please refer to pages 11 and 12 of Travel Characteristic Survey 2011 (TCS 2011). https://www.td.gov.hk/filemanager/en/content 4652/tcs2011 eng.pdf
79.	Table 5.5 refers. Please advise the blank cell under "The Subject Site". Is it the passenger demand under approved scheme?	Please be advised that the cell is revised as "Estimated Peak Hour Transport Demand (Passenger/hr)" in Table 5.3 of revised TIA (Annex A refers).
80.	For remark ⁽²⁾ , there is no table 3.6 in the report.	Please refer to page 14 of Travel Characteristic Survey 2011 (TCS 2011). https://www.td.gov.hk/filemanager/en/content/4652/tcs2011 eng.pdf
81.	Please provide details of remark $^{(2)}$ adjustment based on local PT provision near the subject site.	The details on transport mode of the Subject Site have been provided in Chapter 5 of revised TIA (Annex A refers).
82.	Para 5.14 and 5.17 refer: Please specify the passenger demand (by PT mode) during AM/PM peak hour so generated/attracted to review whether the existing PT services are sufficient to cater for the additional demand.	Passenger demand of Proposed Development has been presented in Paragraphs 5.5 – 5.10 of revised TIA.
83.	Detail assessment on the PT (by routes) shall be conducted to ascertain the adequacy of public transport service for additional population brought by the	Revised public transport assessment has been presented in Chapter 5 of revised TIA (Annex A refers).
	development and the planned/ committed developments in the vicinity e.g. San Hing Road and Hong Po Road. Please propose enhancement of existing PT services or new PT services to cater for the new PT demand generated from the subject site if needed.	4 additional bus trips due to population intake of the Proposed Development would be required as presented in Paragraph 5.13 – 5.19 of revised TIA.
84.	Figure 2.15 refers. Please liaise with the project proponent of San Hing Road/ Hong Po Road site to see if any modification works will be carried out for the bus stop at Lam Tei Interchange eastbound. As stated in your assessment, around 300 pax (791x38%) will use the concerned bus stop for road-based transport. Please assess if the passenger facilities nearby is enough for cater for the population intake in the vicinity and the subject site.	Reference has been made to the gazette plan of "Site Formation and Infrastructure Works for Public Housing Developments at San Hing Road and Hong Po Road, Tuen Mun (Road Works)". The queuing area of the planned bus layby has not been affected (Please refer to Appendix E of revised TIA).

Item	Comments	Our Responses		
		Chapter 5 has been revised and public transport facilities are reviewed to ascertain that the public transport facilities are sufficient.		
	Comments of Railway Division, Highways Department			
	ived on 22 April 2024			
85.	Table 5.2: There is arithmetic error on the calculation of population for the Propsoed Development	Noted and revised.		
86.	Table 5.5:			
00.	(i) Subtitle of the first column under "The Subject Site" is missing.	Noted and revised.		
87.	(ii) Please specify the unit of figures in the table.	Noted and specified.		

Encl.:

Annex A – Revised Traffic Impact Assessment

Annex B – Updated Architectural Drawings

Annex C – Updated Figures in the Supporting Planning Statement

Annex D – Revised Visual Impact Assessment

Annex E - Revised Landscape Master Plan and Tree Preservation and Removal Proposal

Annex F – Finalised Sewerage Impact Assessment

Annex G – Revised Drainage Impact Assessment

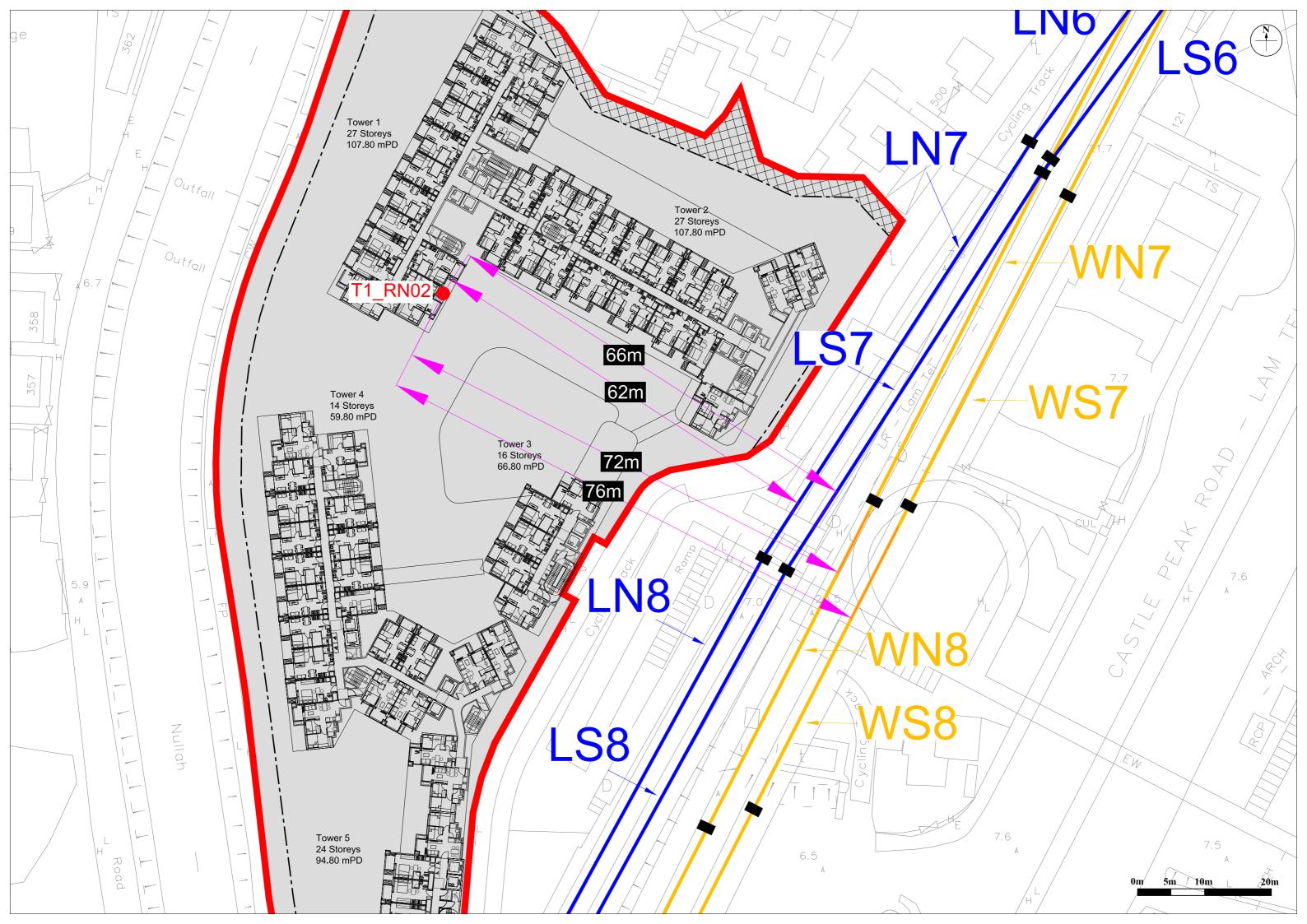
Annex H – Revised Environmental Assessment

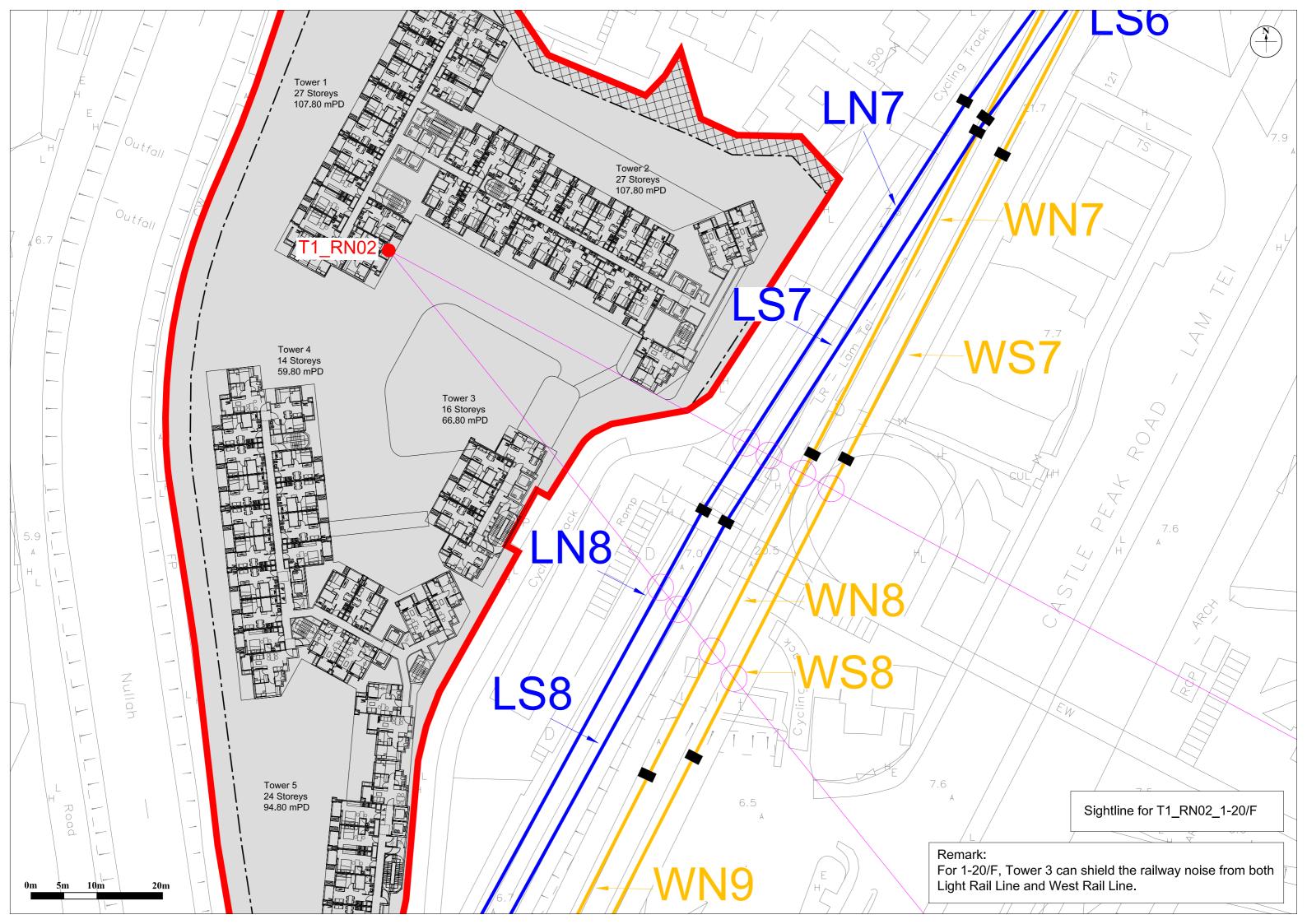
Compiled by: KTA Planning Limited

Date: 24 July 2024

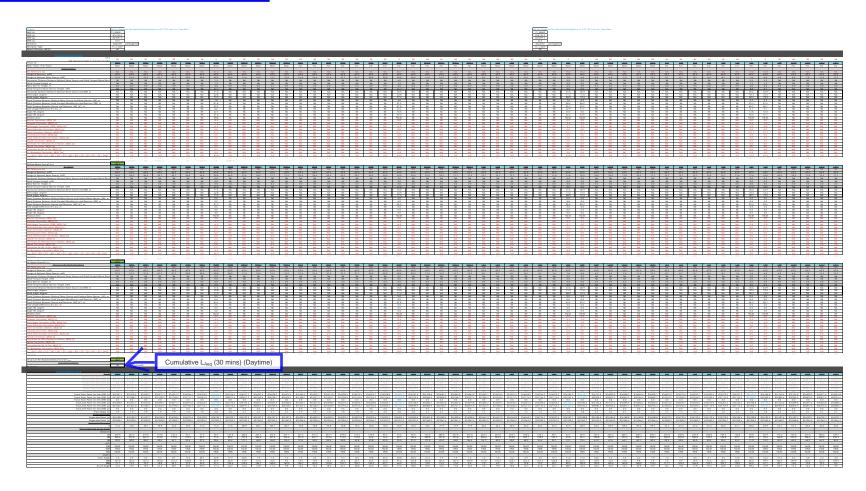
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Attachment A

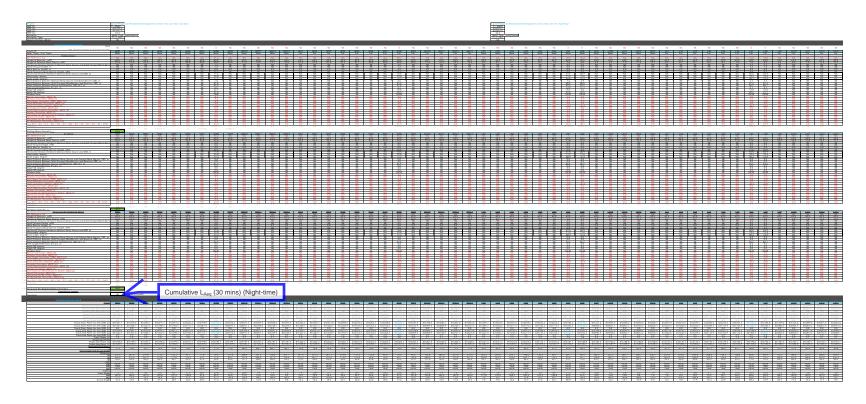




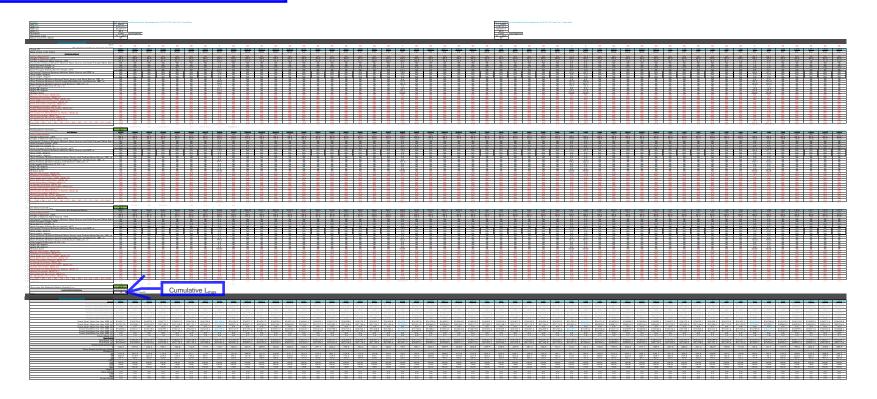
Sample Calculation for T1_RN02 at 13/F (63.5 mPD) (Daytime Scenario)



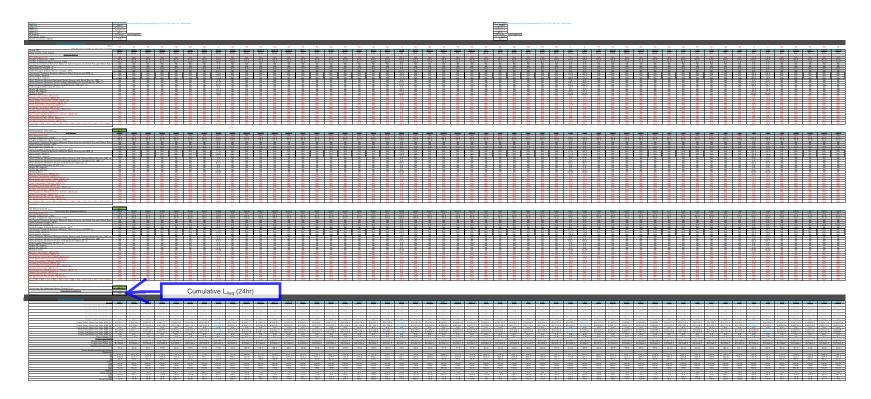
Sample Calculation for T1_RN02 at 13/F (63.5 mPD) (Night-time Scenario)

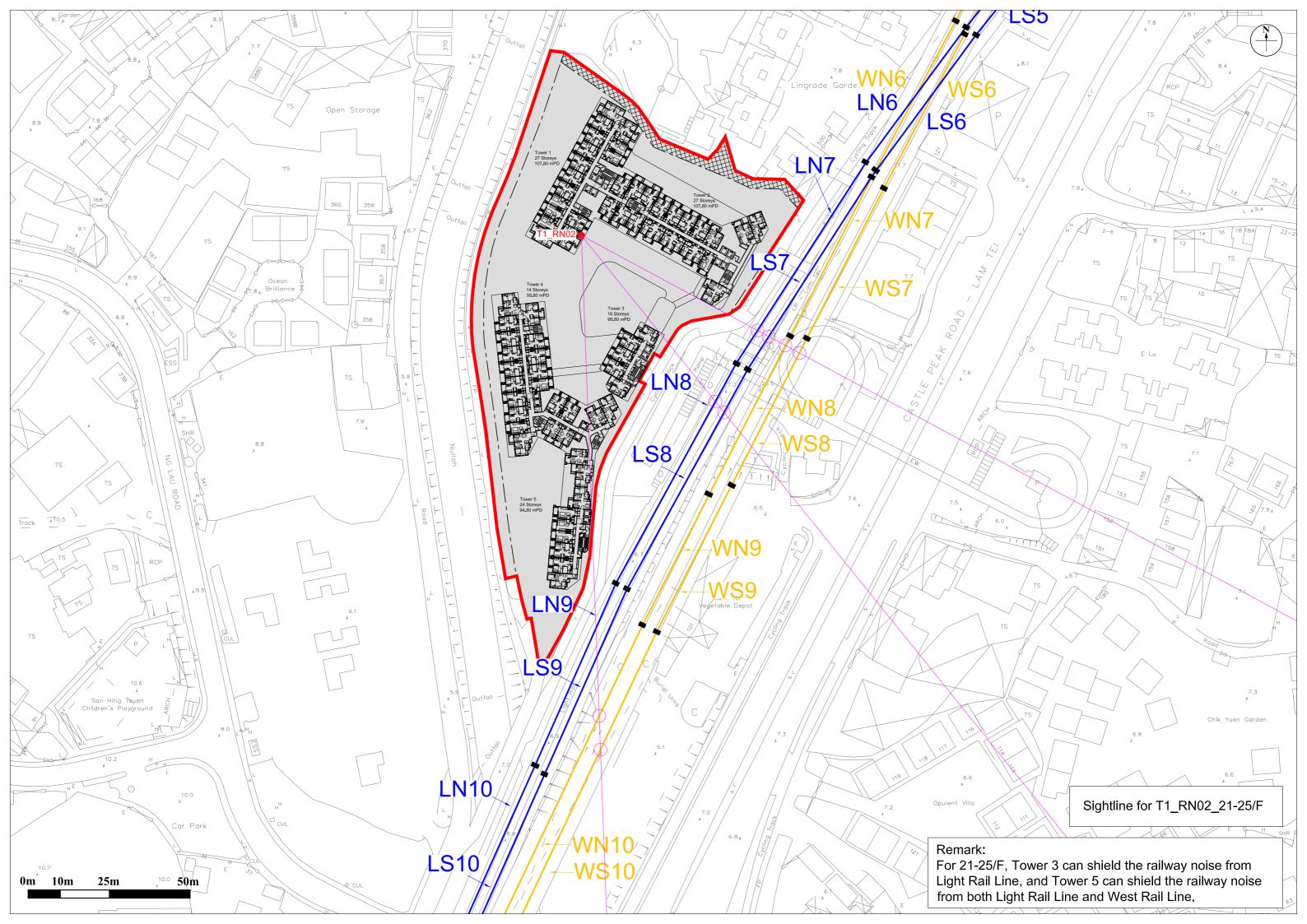


Sample Calculation for T1_RN02 at 13/F (63.5 mPD) $(L_{max} \; Scenario)$

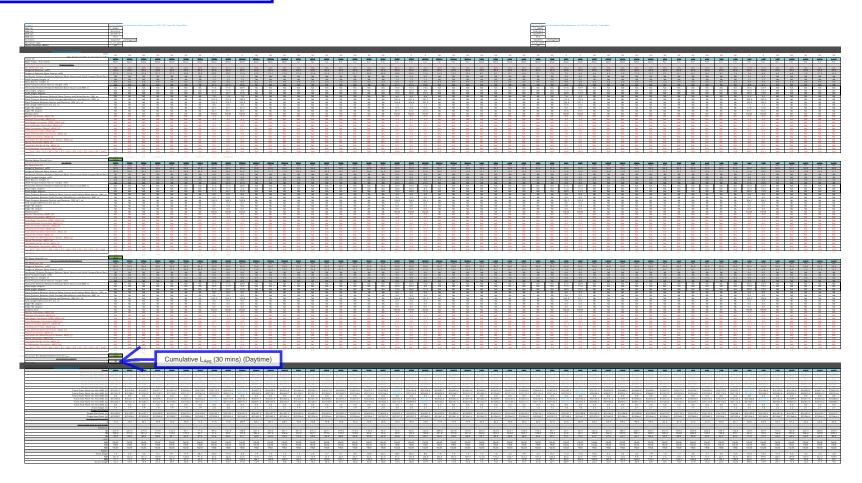


Sample Calculation for T1_RN02 at 13/F (63.5 mPD) (24 hr Scenario)

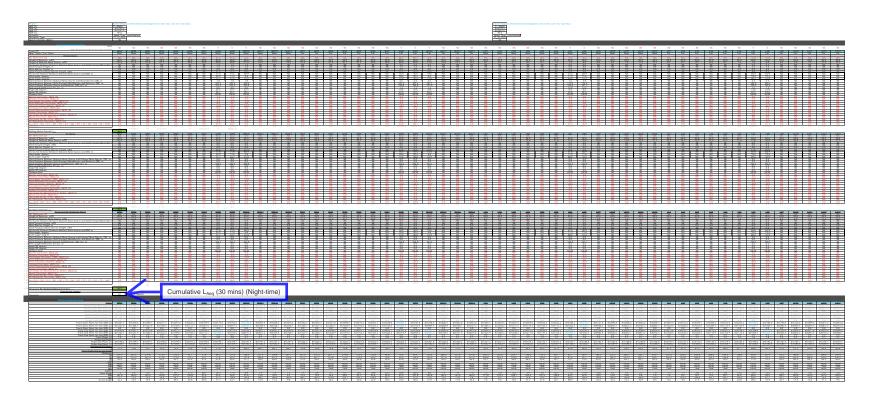




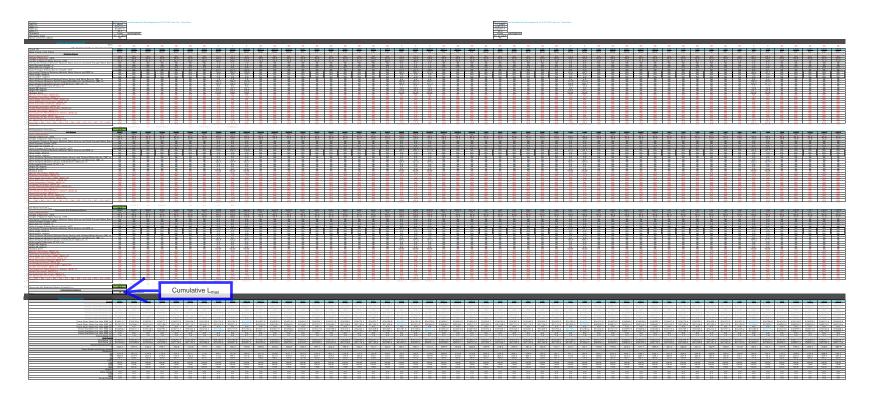
Sample Calculation for T1_RN02 at 22/F (95 mPD) (Daytime Scenario)



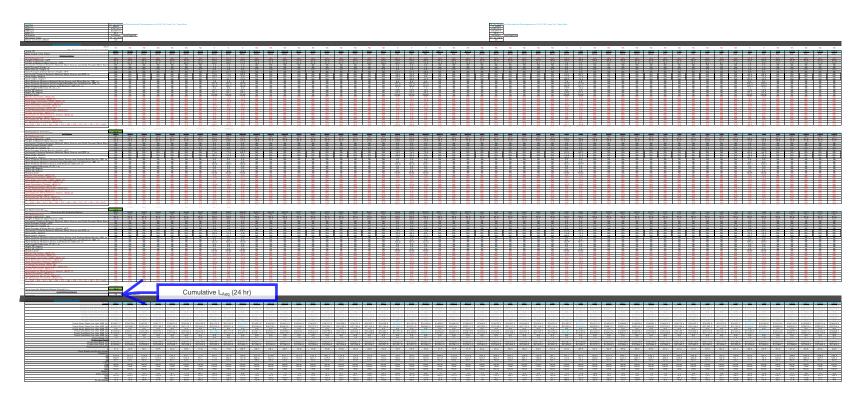
Sample Calculation for T1_RN02 at 22/F (95 mPD) (Night-time Scenario)

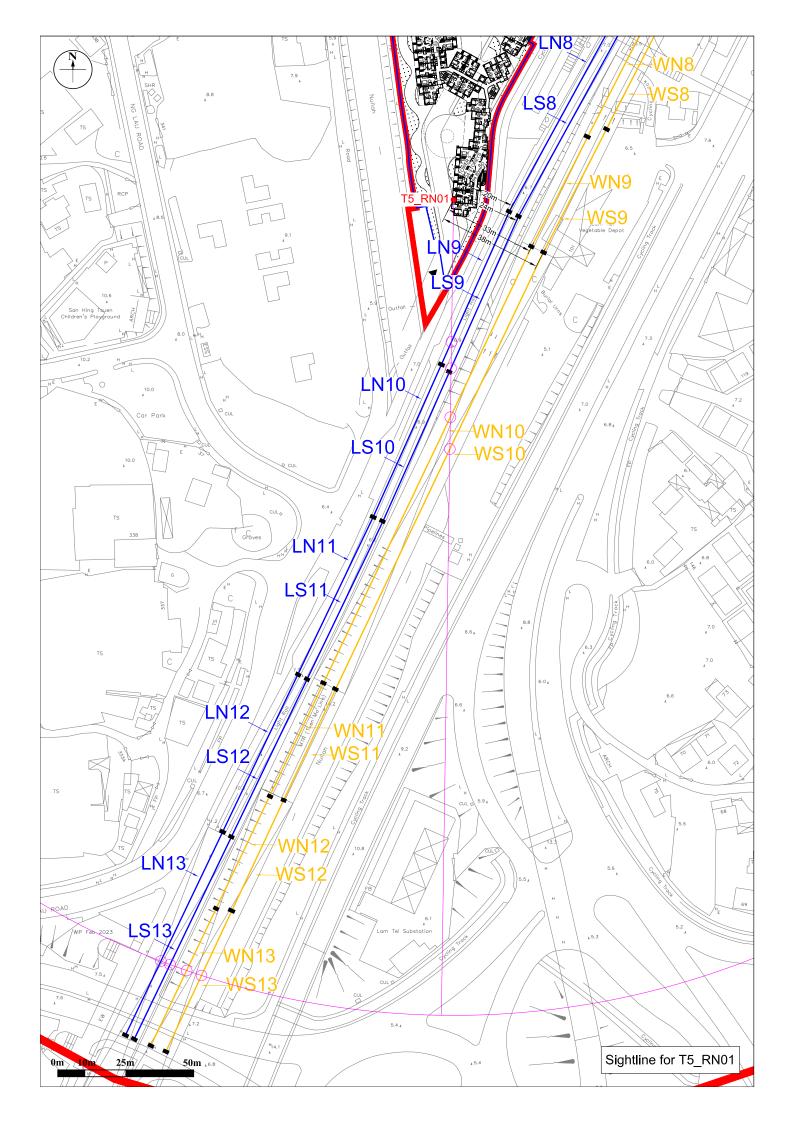


Sample Calculation for T1_RN02 at 22/F (95 mPD) $(L_{max}\ Scenario)$

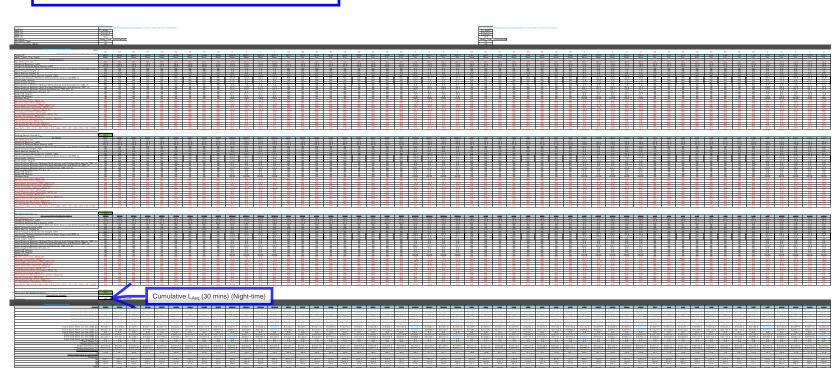


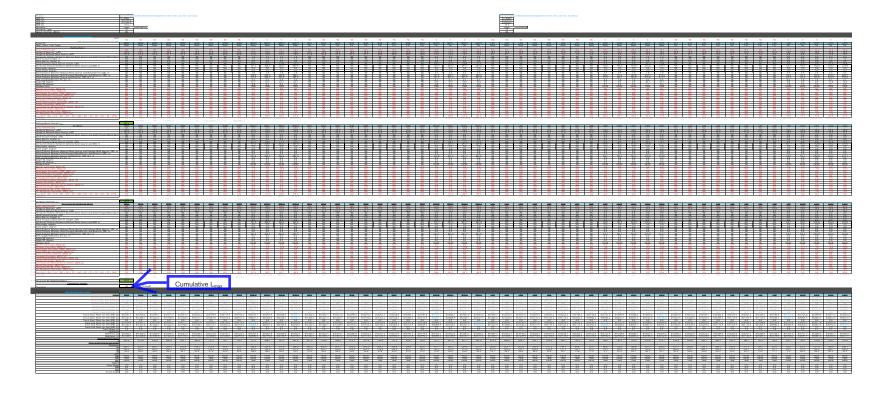
Sample Calculation for T1_RN02 at 22/F (95 mPD) (24 hr Scenario)





Sample Calculation for T5_RN01 at 1/F (15.5 mPD) (Night-time Scenario)

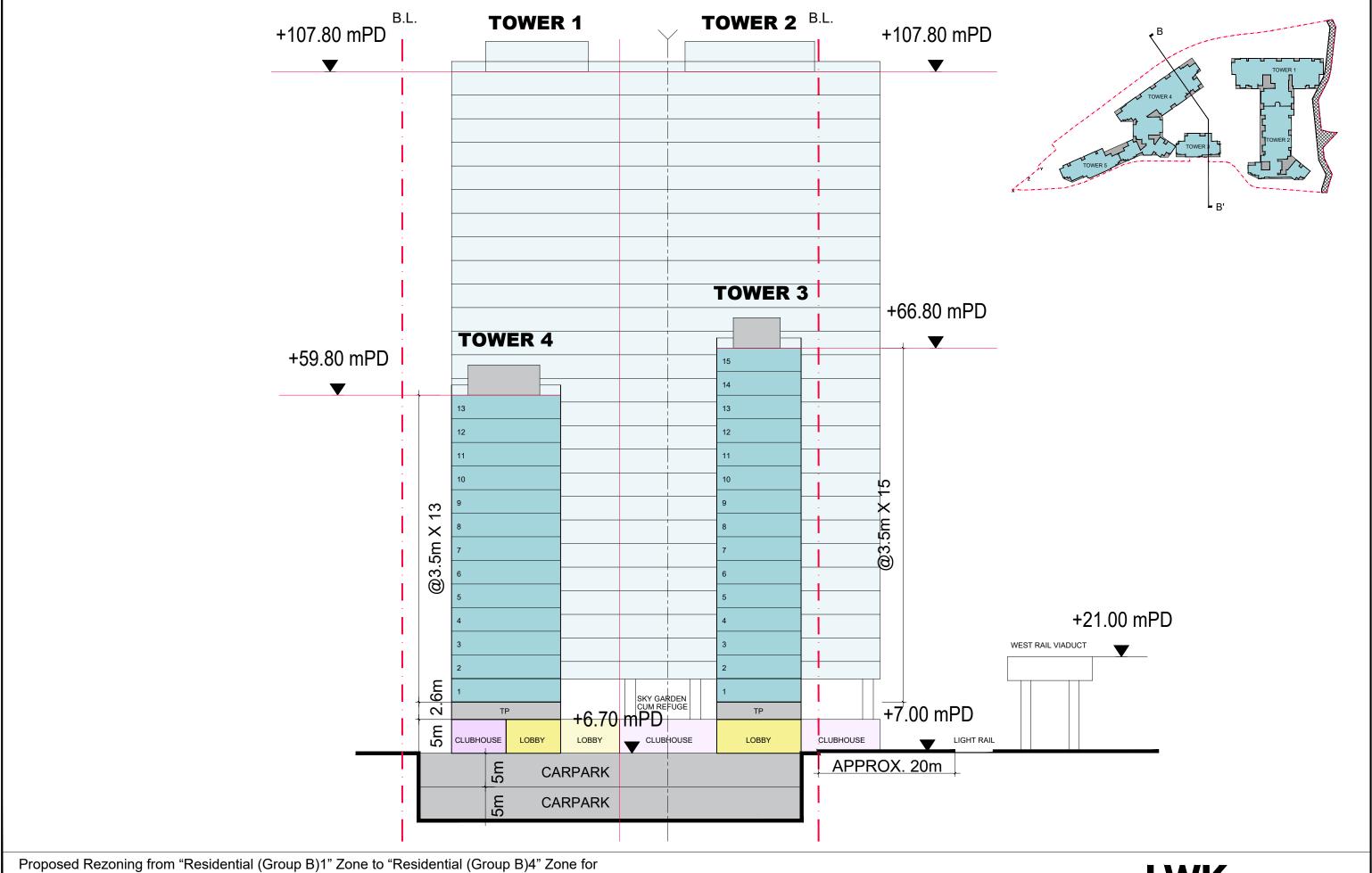




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Sample Calculation for T5_RN01 at 1/F (15.5 mPD) (24 hr Scenario)





Proposed Rezoning from "Residential (Group B)1" Zone to "Residential (Group B)4" Zone for Medium-Density Housing Development to Include a Footpath for Public Use at Various Lots and Adjacent Government Land in DD130, Lam Tei, Tuen Mun

LWK +PARTNERS