



LCH Planning and Development
Consultants Limited

To rezone the application site from "Comprehensive Development Area" and "Green Belt" to "Residential (Group A) 4" and to
 Amend the Notes of the zone applicable to the site

Section 12A Planning Application No. Y/YL-TYST/12

Response to Departmental Comments Table

| No. | Comments Received | Our Responses |
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| A. <i>Comments from Urban Design Unit, Urban Design and Landscape Section, Planning Department (UD&L, PlanD)</i> <i>(Subject Officer: Mr. Jason KO, TP/UD4, Tel: 3565 3941)</i> | | |
| Date: 16 April 2026 | | |
| Urban Design | | / |
| a. | We have no adverse comments on the application from urban design and visual perspectives; | Noted. |
| b. | the subject site (the Site) is located in a residential neighborhood and the mid-way between Yuen Long and Tuen Mun New Towns. To its immediate west in the same "Comprehensive Development Area" ("CDA") zone is a private residential development namely Uptown with building height (BH) up to about 77mPD. Some medium- and low-rise residential developments/village settlements with BHs ranging from about 13mPD to 33mPD are located in the vicinity. In the wider context, the Site is surrounded by planned high-rise developments including a site zoned "Residential (Group A)4" subject to BH restriction (BHR) of 140mPD to its north across Castle Peak Road - Hung Shui Kiu and two sites zoned "Other Specific Uses" annotated "Storage and Workshop Use" subject to BHR of 110mPD to its further east across Yuen Long Highway. The proposed development with a BH of about 57.8 mPD (or a BHR of 60mPD as proposed on the tailor-made Notes) will be taller than those medium- and low-rise residential developments/village settlements but in a comparable BH with Uptown in the same "CDA" zone and it is | Noted. |



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| | not incompatible with those planned high-rise developments in a wider context; and | |
| c. | the design/ mitigation measures proposed under the indicative scheme, including the 25m building separation between two residential towers and landscaping/greening measures, are considered to have urban design merits. | Noted. |
| On the Visual Appraisal (VA), some observations/ comments are provided below, on the understanding that the applicant will provide further information to address the following: | | / |
| a. | <p>the VA should be prepared in accordance with the Town Planning Board Guideline (TPB-PG) No. 41A including the terminology and grading method, in particular:</p> <p>i. the term “visual sensitive receivers (VSR)” should read as “public viewers”;</p> <p>ii. the visual sensitivity should be “Medium” for VP2, VP3 and VP5; and</p> <p>iii. the overall visual impact for VP4 should be “Slight”</p> | <p>/</p> <p>Section 7.12.3 of the Planning Assessment Report and relevant paragraphs in Visual Appraisal (VA) (Appendix 8) have been revised accordingly.</p> <p>Sections 4.2.6, 4.2.10, 4.2.14 and Table 3 of VA have been revised accordingly.</p> <p>Section 4.2.13 and Table 3 of VA have been revised accordingly.</p> |
| Photomontage | | / |
| b. | VP2 – paras. 4.2.6 and 4.2.7 and diagram 7 – the proposed development should appear to be wider and taller (i.e. screening the entire mountain backdrop and half of the open sky) and in front of Uptown at the foreground in the photomontage. The assessment should also be revised accordingly; | Section 4.2.7 and Diagram 7 of VA have been revised accordingly. |
| c. | VP6 – para 4.2.17 - with reference to the Response-to-Comment (RtoC) table, the Consultant mentioned the Madam Chan Wai Chow Memorial Garden is generally not accessible to public. This response is contradictory to the statement “this VP represents residents, pedestrians and park users who frequently visits the garden and surrounding areas.”. The Consultant | Section 4.2.17 of VA has been updated with the updated title of VP6. |



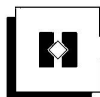
| No. | Comments Received | Our Responses |
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| | should revise the statement and justify the local significance for selecting VP6; and | |
| d. | para 5.1.3 – according to TPB-PG No.41A. “minimal” is not one of the thresholds of the evaluation of overall visual impact. The overall visual impact rating should range from “ Negligible ” to “ Moderate ”. | Sections 6.6.2 and 7.12.3 of the Planning Assessment Report and Section 5.1.3 of VA have been revised accordingly. |
| B. Comments from Environmental Protection Department (EPD) <i>(Subject Officer: Mr. Jeremy FONG, EAP(TN)2, Tel: 2835 2164)</i> | | |
| Date: 16 April 2026 | | |
| <u>Air Quality</u> | | |
| 1. | Section 2.1.2 a) Suggest to revise “good dust abatement practices” in lines 2-3 to “appropriate dust control requirements”, and revise “is limited” in the last line to “will be controlled”. | / Section 2.1.2 of Environmental Assessment (EA) (Appendix 4) has been revised accordingly. |
| 2. | Section 2.3.1 a) Please revise “Fugitive dust and air emission” in line 1 to “Dust from various construction activities and exhaust emissions”. | / Section 2.3.1 of EA has been revised accordingly. |
| | b) Re. R-t-C #3(a), our comments have not been fully addressed. In addition to the estimated amount of excavated materials, please provide the size of active workfront area, estimated no. of construction vehicles and PME to be used at a time, etc. if available, to support the scale of construction works and justify the construction air quality impact can be controlled by the implementation of appropriate control measures. If such information is not available at this moment and will be available at a later detailed design stage, please clearly supplement. | Noted. Section 2.3.2 of EA has been supplemented. |



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| | <p>c) Re. R-t-C #4(a), our comments have not been fully addressed. The cumulative construction air quality impact arising from the project site and concurrent projects, if any, should be assessed. Please advise the construction programme of the subject project and review if there are any concurrent projects, and then qualitatively assess the cumulative construction air quality impact as appropriate.</p> | <p>Sections 2.3.3-2.3.4 of EA have been supplemented regarding the concurrent projects.</p> |
| 3. | <p>Section 2.4.2</p> <p>a) In the 10th bullet, please consider if ASR A01 should be included for hoarding higher than 3.5m since it is the closest ASR to the Project Site.</p> <p>b) Please supplement additional bullets for the control measures on exhaust emissions from construction plant and equipment (e.g. avoid using exempted NRMM, deploy electrified NRMM as far as practicable, and supply mains electricity for construction equipment and avoid diesel-powered machinery as far as practicable, etc.).</p> | <p>/</p> <p>ASR1 has been included in the bullet 10 under Section 2.4.2 of EA.</p> <p>3 additional bullets (bullets 18-20) have been supplemented under Section 2.4.2 of EA.</p> |
| 4. | <p>Section 2.5.1</p> <p>a) Please add “within the 500m assessment area” after “Project Site” in line 6.</p> <p>b) Re. R-t-C #6(a), please supplement the responses in this section to support no adverse I/R interface problem is anticipated.</p> | <p>/</p> <p>Section 2.5.1 of EA has been supplemented.</p> <p>Section 2.5.1 of EA has been supplemented regarding the I/R interface problem.</p> |
| 5. | <p>Section 2.5.3</p> <p>a) Re. R-t-C #7(b), please supplement the responses in this section to support feeder road is comparable to LD therefore 5m buffer distance can be applied.</p> | <p>/</p> <p>Section 2.5.3 of EA has been supplemented with the response from previous R-t-C #7(b).</p> |
| 6. | <p>Section 2.5.4</p> | <p>/</p> |



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| | a) Re. R-t-C #8(a), please supplement the responses at the beginning of this section that the internal road of the Proposed Development will serve as EVA therefore buffer distance does not apply. | Section 2.5.4 of EA has been supplemented with the response from previous R-t-C #8(a). |
| 7. | Section 2.5.5 a) Please add “air quality” after “adverse” in the 2 nd last line, and revise “considered insignificant” in the last line to “not anticipated”. | / Section 2.5.5 of EA has been revised accordingly. |
| 8. | Section 2.5.6 a) Please add “adverse” before “air quality” in the last line, and revise “insignificant” in the last line to “not anticipated”. | / Section 2.5.6 of EA has been revised accordingly. |
| 9. | Section 2.5.7 a) Please revise the last sentence as “Thus, the emissions will be properly controlled in accordance with the guidelines and adverse air quality impact is not anticipated.”. | / Section 2.5.7 of EA has been revised accordingly. |
| 10. | Section 2.5.8 a) Please supplement the last sentence that buffer distance for odour source recommended in Section 3.3.9 of Chapter 9 in HKPSG can be fulfilled. b) Please revise “the potential” in the 2 nd last line to “adverse”, and revise “considered insignificant” in the last line to “not anticipated”. | / Section 2.5.8 of EA has been supplemented. Section 2.5.8 of EA has been revised accordingly. |
| 11. | Section 2.5.9 a) Please revise the last sentence as “Thus, the odour emissions will be properly controlled in accordance with the guidelines and adverse odour impact is not anticipated.”. | / Section 2.5.9 of EA has been revised accordingly. |
| 12. | Figures 2-1 and 2-3 | / |



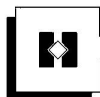
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| | a) Suggest to revise "500m Study Area" to "500 Assessment Area" in the title and legend. | Figures 2-1 and 2-3 of EA have been revised accordingly. |
| | Noise | / |
| 13. | S3.3.3 - Please revise the title "Planned Railway Noise Source" to "Planned Transit Noise Source" as the noise from SGMSTs should be categorized as Transit Noise instead of Railway Noise. | Title of Section 3.3.3 of EA has been revised accordingly. |
| | Water Quality | / |
| 14. | S4.1.2 - Please note that ProPECC PN 2/23 has been superseded by ProPECC PN 2/24. | Sections 4.1.2, 4.4.2 and 4.5.2 of EA have been revised accordingly. |
| | Waste Management | / |
| 15. | S.5.2.46 and Table 5-3: please note that chemical waste and clinical waste are two distinct waste types and are managed under slightly different control schemes. Accordingly, please single out clinical waste and add a separate sub-subsection under "Operation Phase" that only deals with clinical waste. For further details on the EPD's clinical waste control scheme, please refer to the following webpage: https://www.epd.gov.hk/epd/clinicalwaste/en/scheme.html . Please ensure that clinical waste is likewise being dealt with separately in other sections of this report. | Please note that Table 5-3 of EA is a summary of waste estimation during construction phase, hence clinical waste is not anticipated during construction phase. Sections 5.2.45-5.2.46 of EA have been revised accordingly. Additional sections 5.2.48-5.2.50 of EA have been supplemented regarding clinical waste generated during operation phase. Sections 5.2.51, 5.3.9, 5.4.2 and 7.1.17 of EA have been updated referring to the separation of chemical and clinical wastes. |
| 16. | S.5.3.8, bullet 1: "...subsidiary" should read "...subsidiary legislation". Please revise. | Bullet 1 of Section 5.3.8 of EA has been revised. |
| 17. | S.5.3.9: the short name of Organic Resources Recovery Centre is "O Park", not "ORRC". Please revise. Also, please mention chemical and clinical waste in this paragraph. | Section 5.3.9 of EA has been revised and updated regarding the mitigation measures for chemical and clinical wastes generated during operation phase. |
| 18. | S.5.4.2: please mention clinical waste in this paragraph. | Section 5.4.2 of EA has been supplemented. |
| 19. | S.7.1.17: please mention clinical waste in this paragraph. | Section 7.1.17 of EA has been supplemented. |
| 20. | Please highlight all the changes/amendments in the next submission. | Noted. |
| C. Comments from Social Welfare Department (SWD) (Subject Officer: Ms. Doris LEUNG, EA(P)NT, Tel: 3691 8500) | | |

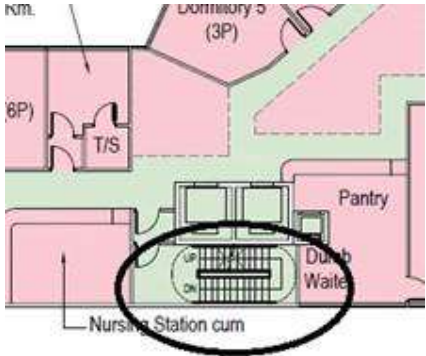


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| Date: 20 April 2026 | | |
| <u>Licensing Perspective</u> | | / |
| 1. | Demonstrate the means of escape from the far end of multi-purpose Room / rehabilitation Area on G/F to the ultimate place of safety. | Further details will be considered and provided in the detailed design stage. |
| 2. | Clarify whether “Circulation Area for RCHE” (highlighted in lime) is part of proposed license area for RCHE in future. | Colour legend of the Indicative Architectural Drawings (Appendix 1) has been updated for easy reference. |
| 3. | Dead end travel distance should not be greater than 12m. Dormitories 1 and 3 could have exceeded the requirement. | Noted. Please note all room is designed under the statutory requirements including the Residential Care Homes (Elderly Persons) Regulation (Cap. 459A), the Code of Practice for Residential Care Homes (Elderly Persons), and the Residential Care Homes Legislation (Miscellaneous Amendments) Ordinance 2023 (Ordinance No. 12 of 2023). Further details with exact room parameters will be provided in the detailed design stage. |
| 4. | All dormitories and isolation rooms / end-of-life care room, kitchen and laundry should have prescribed windows in accordance with Building (Planning) Regulations. It is noted that the majority of external walls on RCHE floors are considerably less than 2.3m from boundaries abutting adjacent lots. | Noted. Please note building design have been considered in complying with the requirements under the B(P)R. To allow future flexibility following the approval of s.12a application, an open layout plan presentation has been provided, further details will be provided in the detailed design stage. |
| Detailed comments will be provided at the building plan submission stage / licence application stage. | | Noted. |
| <u>Service Perspective</u> | | / |
| <u>24m Height Restriction</u> | | / |
| As stipulated in Para 5.3.2 of the Code of Practice for Residential Care Homes (Elderly Persons) (June 2024 Revised Edition) (CoP), “...No part of an RCHE shall be situated at a height more than 24m above the ground floor...”. In this regard, would the applicant please ensure that the 24m height restriction as set out in the CoP is fully complied. | | Noted. |
| <ul style="list-style-type: none"> According to Para. 5.5.1 of Landscape Proposal, 7/F podium garden is open for RCHE residents. Would the applicant please | | Noted. Please note the proposed 7/F podium garden will only target for the future users of residential units, hence the Proposed |



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| | <p>clarify whether any part of the said podium garden/ RCHE Landscape Deck on 7/F be included as part of RCHE premises. Please be reminded that the communal open spaces / Landscape Deck is not be a provision of RCHE and such areas at a height of over 24m should not be accessible to RCHE residents.</p> | <p>Development is in line with the requirements as set out in Para 5.3.1 of Code of Practice for Residential Care Homes (Elderly Persons), to support a quantity and quality RCHE in promoting community well-being.</p> <p>Relevant paragraphs in Planning Assessment Report and Landscape Proposal (Appendix 7) have been revised accordingly.</p> |
| | <ul style="list-style-type: none"> The proposed NOFA of dormitories for 450-p RCHE is 2691.5 sqm. According to the latest layout plan, the capacity of each dormitory is 3 to 10 residents. The applicant is suggested to refer to Para 6(a) of the attached Best Practices in Design and Operation of Residential Care Home for the Elderly for the space standard in dormitory. | <p>Noted. Please note provision of about 10.9 sq.m. floor space for each RCHE resident is provided under this Proposed Development (i.e., 4,907.1 sq.m. / 450 persons = about 10.9 sq.m.). Please refers to Appendix 2 of the Proposed Schedules of Accommodation for the RCHE, in which is fully complied with the statutory minimum floor space occupied per resident under the Residential Care Homes (Elderly Persons) Regulation (Cap. 459A), the Code of Practice for Residential Care Homes (Elderly Persons), and the Residential Care Homes Legislation (Miscellaneous Amendments) Ordinance 2023 (Ordinance No. 12 of 2023).</p> |
| | <p><i>[See attachment "Design_and_Operation_RCHE_Eng_Sept_2024.pdf"]</i></p> | <p>/</p> |
| | <ul style="list-style-type: none"> Please provide notional beds in dormitory rooms and Sick/ Isolation/ Quiet cum End-of-life Care Rooms in the layout plan for our easy reference | <p>Indicative Architectural Drawings (Appendix 1) has been revised accordingly.</p> |
| | <ul style="list-style-type: none"> It is recommended that one lift serving the RCHE should accommodate a stretcher bed measuring 2,050mm x 560mm for conveyance of bed-bound residents. | <p>Noted. Further details with exact room parameters will be provided in the detailed design stage.</p> |
| | <ul style="list-style-type: none"> Parking spaces and loading/unloading bay for private car and motorcycle are not regarded as the provision of RCHE. Please be reminded that parking spaces may be disregarded from calculation of RCHE GFA for premium concession according to Remark (3) under the Annex to LAO Practice Note 5/ 2023. | <p>Noted. Traffic Impact Assessment (TIA) (Appendix 3) will not be affected by the RCHE GFA.</p> |



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| | <ul style="list-style-type: none"> Please review if it is an internal staircase serving RCHE only, as it is accessible by domestic residents on 6/F according to proposed layout plan. While the development is shaded in different colours for demarcation purpose, the applicant is advised to demarcate the RCHE area intended for calculation of RCHE GFA in one color for our easy reference.  | <p>Colour legend of the Indicative Architectural Drawings (Appendix 1) has been updated for easy reference.</p> |
| | <ul style="list-style-type: none"> To safeguard the privacy of staff, provision of Staff Changing Room/Staff Toilet/Bathroom should be provided separately for male and female staff. | <p>The 6/F floor plan of the Indicative Architectural Drawings (Appendix 1) has been updated regarding the separation of male and female staff changing rooms/ staff toilets/ bathrooms.</p> |
| | <ul style="list-style-type: none"> The names of Sick/Isolation/ Quiet Room cum End-of-Life Care Room, Dining/Multi-Purpose Area, Multi-Purpose Room and Multi-Purpose Room/ Rehabilitation Area on the layout plan do not tally with the provisions on the SoA list (Encl 6). Please review and revise the names of the provision accordingly. | <p>Proposed Schedules of Accommodation for the RCHE (Appendix 2) has been revised accordingly.</p> |
| | <ul style="list-style-type: none"> If there are any consequential changes in proposed area arising from the revision of layout plan, would the applicant please update the SoA table for our consideration. | <p>Noted.</p> |
| | <ul style="list-style-type: none"> With a view to meeting the objective of providing a quality RCHE, the applicant should refer to the following updated | <p>Noted.</p> |



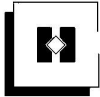
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| | <p>version of (i) Guidance Note of RCHE, (ii) Best Practice in Design and Operation of RCHE, and (iii) Best Practices Guidance – Basic Provision Schedule Specific Requirements for RCHE when Designing and Planning for the Proposed RCHE. The applicant is reminded to comply with the entire ventilation requirements stipulated in Para. 4.9 “Heating, Lighting and Ventilation” in the latest version of the CoP.</p> | |
| | <ul style="list-style-type: none"> It is noted that the applicant would like to apply for the time-limited enhancements under the Incentive Scheme to Encourage Provision of Residential Care Home for the Elderly Persons in Private New Developments (the Incentive Scheme). Subject to the result of this application of planning permission for the development of RCHE, SWD would render comments on the detailed design of the RCHE upon the receipt of LandsD’s referral and would seek policy support from LWB on the application when suitable. | Noted. |
| <p>D. Comments from Drainage Services Department (DSD) <i>(Subject Officer: Mr. LOU Tai Yeong, E/YL4, Tel: 3965 8929)</i></p> | | |
| <p>Date: 21 April 2026</p> | | |
| <p><u>Drainage Impact Assessment</u></p> | | / |
| | <p>i. Cross sections showing the existing and proposed ground levels of the captioned site with respect to the adjacent areas should be given.</p> | <p>Figure D5 of Drainage Submission (Appendix 6) has been supplemented regarding the site sections of the existing and proposed ground levels of the Subject site.</p> |
| | <p>ii. Appendix – Please review the invert level difference for CP1.1-CP1.2, CP1.4-CP1.5, CP2.2-CP2.3, CP2.3-CP2.4, CP2.8-CP2.9, CP2.9-TM and Point Z-Point Y under Column (8) which seems not consistent with the difference between Column (6) and Column (7).</p> | <p>Please note the invert level difference for CP1.1-CP1.2, CP1.4-CP1.5, CP2.2-CP2.3, CP2.3-CP2.4, CP2.8-CP2.9 and CP2.9-TM under Column (8) apparently not consistent with the difference between Column (6) and Column (7) is due to rounding. To clarify, figures in Column (6), Column (7) and Column (8) are now shown in 3 decimal places in the updated Appendix of Drainage Submission.</p> |



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| | | The invert level difference for Point Z-Point Y under Column (8) is for information/reference only; general gradient of the channel section adjoining the Application Site, i.e. 1 in 500 (0.002), is adopted for this hydraulic assessment in Appendix of Drainage Submission . |
| iii. | General – The Applicant is required to rectify/modify the drainage system if it is found to be inadequate or ineffective during operation. The Applicant shall also be liable for and shall indemnify Government against claims and demands arising out of damage or nuisance caused by failure of the system. | Noted and accepted. |
| iv. | General – The Applicant should take all precautionary measures to prevent any disturbance, damage and pollution from the development to any parts of the existing drainage facilities in the vicinity of the lot. In the event of any damage to the existing drainage facilities, the Applicant would be held responsible for the cost of all necessary repair works, compensation and any other consequences arising therefrom. | Noted and accepted. |
| v. | General – The proposal must not obstruct overland flow or existing flow paths. All existing flow paths as well as the runoff falling onto and passing through the site will be intercepted and disposed of via proper discharge points. Free flow condition of the adjacent drains, channels and watercourses should be maintained at all time. | Noted. Please refer to Figure D4 of Drainage Submission for the peripheral channels intercepting all flows crossing the Subject site boundary will be provided and the flows will be disposed of via a terminal manhole (with trap) into the adjacent existing box culvert. |
| vi. | General – The Applicant is required to ensure that no construction debris, silt and sediments, or cementitious materials will be discharged to or deposited inside the public drains from the site. Any blockage or damage of public drains arising from the construction works shall be made good at the cost of the Applicant and to our satisfaction. | Noted and accepted. |
| vii. | General – Please be reminded to comply with “DSD Technical Circular No. 1/2017 Temporary Flow Diversions and Temporary Works Affecting Capacity in Stormwater Drainage | Noted and accepted. |



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| | Systems” if the proposed works involve the construction of permanent or temporary works within, over or adjacent to DSD’s stormwater drainage systems. In addition, the drainage works related to existing stormwater drainage systems should be implemented during dry seasons only. | |
| | <u>Sewerage Impact Assessment</u> | / |
| i. | Page 2 of the report repeated, please review. | It might be a clerical error and should have been avoided in the resubmission. |
| ii. | Figure D4 is not the same version as the submitted DIA, please review. | <p>Please note the two aforementioned Figure D4 of Drainage Submission and Sewerage Impact Assessment (SIA) (Appendix 5) are different, that have been included different submissions under which the site boundaries are not the same.</p> <p>Figure D4 enclosed in the Appendix 2 of SIA is a record and is referred to the documents submitted to the Buildings Department in support of the Drainage Plan for approval in 2022 and for information only in the subject SIA.</p> <p>Yes, the mentioned Figure D4 is not the same version as the submitted Drainage Submission.</p> |
| iii. | According to our record, the invert level of the outlet (i.e. X1) at FMH1036685 is +8.45mPD. Please review the relevant drawings and calculations. | Figure S3 of SIA has been revised accordingly. |
| iv. | Polyethylene (PE) pipe (PE100-RC) should be used for sewers in accordance with Corrigendum No. 1/2024 of Sewerage Manual Part 1, please review and update the relevant drawings and calculations. | Please note polyethylene (PE) pipes (PE100-RC) are adopted in assessing the proposed sewers. For conservative, precast concrete pipes are presumed in checking the existing sewers. Calculations of hydraulic analysis in Appendix 3 of SIA have been updated. Originally proposed pipe sizes and gradients are still appropriate under the updated calculations. |
| v. | The SIA report needs to meet the fill satisfaction of SIG/EPD, the planning authority of sewerage infrastructure. | Noted. |



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| | This is a coordinated reply from Land Drainage Division and Mainland North Division of Drainage Services Department. | / |
| | Please note that HyD, WSD, West Development Office and Geotechnical Engineering Office of CEDD, AFCD and HAD have no comment on the application. | Noted. |