

14 September 2026

The Secretary
Town Planning Board
c/o Planning Department
15/F North Point Government Offices
333 Java Road
Hong Kong

By Hand and By Email

Dear Sir,

Section 16 Planning Application for Proposed Commercial Use at Phase IIa Development of an Approved Master Layout Plan (MLP) with Minor Relaxation of Plot Ratio Restriction (Proposed Amendments to the Approved MLP for Comprehensive Residential, Commercial, Social Welfare Facility and Public Vehicle Park Development; with Minor Relaxation of Plot Ratio Restriction Approved at Phase III) at Lot Nos. 461 RP, 462 S.B, 463 S.B, 464 RP, 495 RP and 539 S.B in D.D. 116, Yuen Long Town Lot (Y.L.T.L.) 504, Y.L.T.L. 544 (Part) and Adjoining Government Land, Yuen Long, New Territories (Application No. A/YL/333)

Reference is made to the Further Information for captioned application submitted to the Town Planning Board (the Board) on 7 August 2026 and subsequent departmental comments received via the Tuen Mun and Yuen Long West District Planning Office (DPO/TMYLW) in September 2026.

In response to the comments from various government departments, we herewith submit 4 copies of responses-to-comments (RtoC) table with the following attachments:

Attachment 1	Replacement Pages of Planning Statement
Attachment 2	Replacement Page of Traffic Impact Assessment
Attachment 3	Replacement Page of Visual Impact Assessment
Attachment 4	Replacement Page of Environmental Assessment

Please note that the current submission only serves to provide technical clarifications and responses to departmental comments with no changes to the proposed block layout and major development parameters.

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Thank you for your kind attention. Should there be any queries, please do not hesitate to contact the undersigned at [REDACTED] or our Mr Arnold Koon at [REDACTED] / Ms Samantha Chuang at [REDACTED]

Yours faithfully
for Llewelyn-Davies Hong Kong Ltd

PP. 

Winnie Wu
Planning Director

WW/AK/sc
Encl.

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cc (w/ encl)
DPO/TMYLW

Attn: Ms Zoe Lau / Ms Carmen Cheung / Mr Kevin Lam (by email)

**Section 16 Planning Application for Proposed Commercial Use at Phase IIa Development of an Approved Master Layout Plan (MLP) with Minor Relaxation of Plot Ratio Restriction (Proposed Amendments to the Approved MLP for Comprehensive Residential, Commercial, Social Welfare Facility and Public Vehicle Park Development; with Minor Relaxation of Plot Ratio Restriction Approved at Phase III) at Lot Nos. 461 RP, 462 S.B, 463 S.B, 464 RP, 495 RP and 539 S.B in D.D. 116, Yuen Long Town Lot (Y.L.T.L.) 504, Y.L.T.L. 544 (Part) and Adjoining Government Land, Yuen Long, New Territories
(Application No. A/YL/333)**

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5. Environmental Protection Department	Page	7

	Departmental Comments	Responses to Comments
1.	Comments of Drainage Services Department	
1.1	<u>Drainage Impact Assessment (DIA)</u>	
1.1.1	No objection in principle to the proposed application and have no comment on the Drainage Impact Assessment (DIA) and Sewerage Impact Assessment (SIA) from the public drainage point of view. Nevertheless, the applicant should note the following:-	No objection in principle to the proposed application and no comment on the DIA and SIA are noted.
1.1.2	- Referring to the meeting held on 20 August 2026 among DSD, HyD, TD and the applicant, it is noted that the applicant would further review the design of the vehicular bridge. If there is any change to the structural form of the vehicular bridge that would reduce the agreed headroom or affect the hydraulic performance of the existing nullah, the applicant shall submit a revised DIA to DSD for agreement and to ensure that the decking proposal must not cause an unacceptable increase in the risk of flooding in areas upstream of, adjacent to or downstream of the decked section.	Noted.
1.1.3	- Peripheral drainage system shall be provided along the site boundary of the lower sides to collect the surface runoff accrued on the application site and to intercept the overland flow from the adjacent lands.	Noted.
1.1.4	- The proposal must not obstruct overland flow or existing flow paths. All existing flow paths as well as the runoff falling onto and passing though 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.

	Departmental Comments	Responses to Comments
1.1.5	- Please be reminded to comply with “DSD Technical Circular No. 1/2017 Temporary Flow Diversions and Temporary Works Affecting Capacity in Stormwater Drainage 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.	Noted.
1.1.6	- The SIA needs to meet the full satisfaction of Sewerage Infrastructure Group of Environmental Protection Department, the planning authority of sewerage infrastructure.	Noted.
2.	Comments of Planning Department – District Planning Office	
2.1	It is understood that openings are proposed to be reserved at the north, east and west boundary of Phase IIa site. Please clarify if the applicant intends to provide pedestrian footbridges/walkway at these connections in future, and if not, please provide the underlying rationale.	All reserved openings are provided to allow flexibility for possible connections to nearby developments in future. Since the possible pedestrian footbridges/walkways would be located outside the boundary of Phase IIa and may fall within other private lots which are not under the Applicant’s ownership, the provision of the potential footbridges/walkways shall be subject to detailed design, and liaison with stakeholders and relevant government departments at later stage.
2.2.	Please advise the <u>width</u> of setback in metres to be provided along Yau Tin East Road and full-height building setback from Castle Peak Road-Yuen Long respectively. Please indicate the width of setbacks on Figure 4.13 of the Planning Statement. Please also elaborate the applicant’s proposal on “while the frontage accommodates the vehicular entrance, a setback of the semi-open-air carpark fronting the existing nullah along Yau Tin East Road is reserved...” at para. 4.2.5 of the planning statement. Please advise if the statement could be interpret as setback from podium level.	The width of building setback along Yau Tin East Road and Castle Peak Road-Yuen Long are not less than 9m and 1.5m respectively. Figure 4.13 of the Planning Statement has also been updated accordingly in Attachment 1 . Please also be confirmed that the relevant texts quoted in para. 4.2.5 refers to the setback from podium level only.

	Departmental Comments	Responses to Comments
2.3	Please advise the <u>width</u> of building separation in metres to be provided from Phase I (Tower 1) and Phase IIb building block respectively. Please indicate the width of separation and setback on Figure 4.13 of the Planning Statement accordingly.	The width of building separation from Phase I (Tower 1) is not less than 25m. The width of building setback from Phase IIb boundary is not less than 1.5m. Since the building block and disposition in Phase IIb are indicative only and subject to refinements by the future developer, the building setback of Phase IIa from Phase IIb's boundary is provided instead. Figure 4.13 of the Planning Statement has also been updated accordingly in Attachment 1 .
2.4	Please provide the opening hour of pedestrian walkway of adjoining YOHO Mall I.	The opening hour of pedestrian walkway of adjoining YOHO Mall I is 10:00am to 10:00pm.
2.5	The applicant should also take note that the planning application no. A/YL/290 has been lapsed. Please remove the application from the assessment (e.g. TIA) as necessary.	Noted that planning application no. A/YL/290 has already lapsed. Nonetheless, as a conservative approach, this development has also been taken into account in the TIA. A remark has been added in the TIA to reflect the current status of application no. A/YL/290. Please refer to the replacement pages of TIA in Attachment 2 . As noted from TD's latest reply confirming no further comment on the application from traffic engineering perspective, even with the inclusion of this planning application no. A/YL/290, the proposed commercial development is still feasible in traffic terms.

	Departmental Comments	Responses to Comments
3.	Comments of Planning Department – Urban Design and Landscape	
3.1	<u>No further comments</u> and <u>no adverse comments</u> on the application from urban design and visual perspectives. Our detailed comments are as follows:	No further comments and no adverse comments on the application are noted.
3.1.1	(a) situated at a strategic location of the Yuen Long New Town, the application site (the Site) forms part of the cluster of high-rise commercial/residential developments adjacent to the Yuen Long Station and along both sides of the Castle Peak Road, with building heights (BHs) ranging from about 105mPD to 175mPD. The proposed development with a BH of 145mPD is considered compatible with the surrounding context;	Noted.
3.1.2	(b) the Site is the subject of two previously approved applications (No. A/YL/205 and 298) which covered the whole “Comprehensive Development Area” zone. The current application involves amendments to Phase IIa area only. As compared to the latest approved scheme, the current proposal mainly involves change of use from hotel to commercial/office/retail; increase in BH from 135.7mPD to 145mPD (i.e. increase of about 9.3m or 6.9%); provision of carparking space to above ground levels; and a minor increase in plot ratio from 9.5 to 9.93 due to detailed setting out. A Visual Impact Assessment (VIA) has been submitted by the applicant which concludes that significant adverse visual impacts are not anticipated as compared to the latest approved scheme; and	Noted.
3.1.3	(c) the proposed building setbacks, building separations from existing and planned developments, and landscaping measures are considered to have urban design merits.	Noted.

	Departmental Comments	Responses to Comments
3.2	<u>VIA</u>	
3.2.1	(d) in paragraph 4.3 (Conclusion) of the VIA, the applicant simply maintains that “no visual change from VP6 is expected, as the Proposed Commercial Development will be totally screened off by the existing YOHO Midtown development, given the viewing distance”. For the completeness of the VIA, the magnitude of change and overall visual impact of VP6 should read “negligible”; and	Noted. Paragraph 4.3 (Conclusion) of the VIA has been updated accordingly for completeness. Please refer to the replacement pages of Planning Statement and VIA in Attachments 1 and 3 respectively.
3.2.2	(e) Replacement pages of AVA IS - the computational model (Appendix 3) – Further to the consultant’s responses received on 1.9.2026, it is also noted that the highlighted schools with simplified geometry are not located in the immediate vicinity of the subject site. As such, we have no further comments on the FI-1 from air ventilation perspective.	No further comment from air ventilation perspective is noted.
3.3	We have <u>no adverse comments</u> on the application from landscape planning perspective. Our comments are as follows:	No adverse comments on the application from landscape planning perspective is noted.
3.3.1	(i) according to the aerial photo taken in 2025, the Site was situated in an area of Miscellaneous Urban Fringe Landscape characterised by residential buildings and tree clusters;	Noted.
3.3.2	(ii) with reference to the site photos taken by DPO on 10.6.2026, the Site was formed, some temporary structures and existing trees were found within the Site;	Noted.

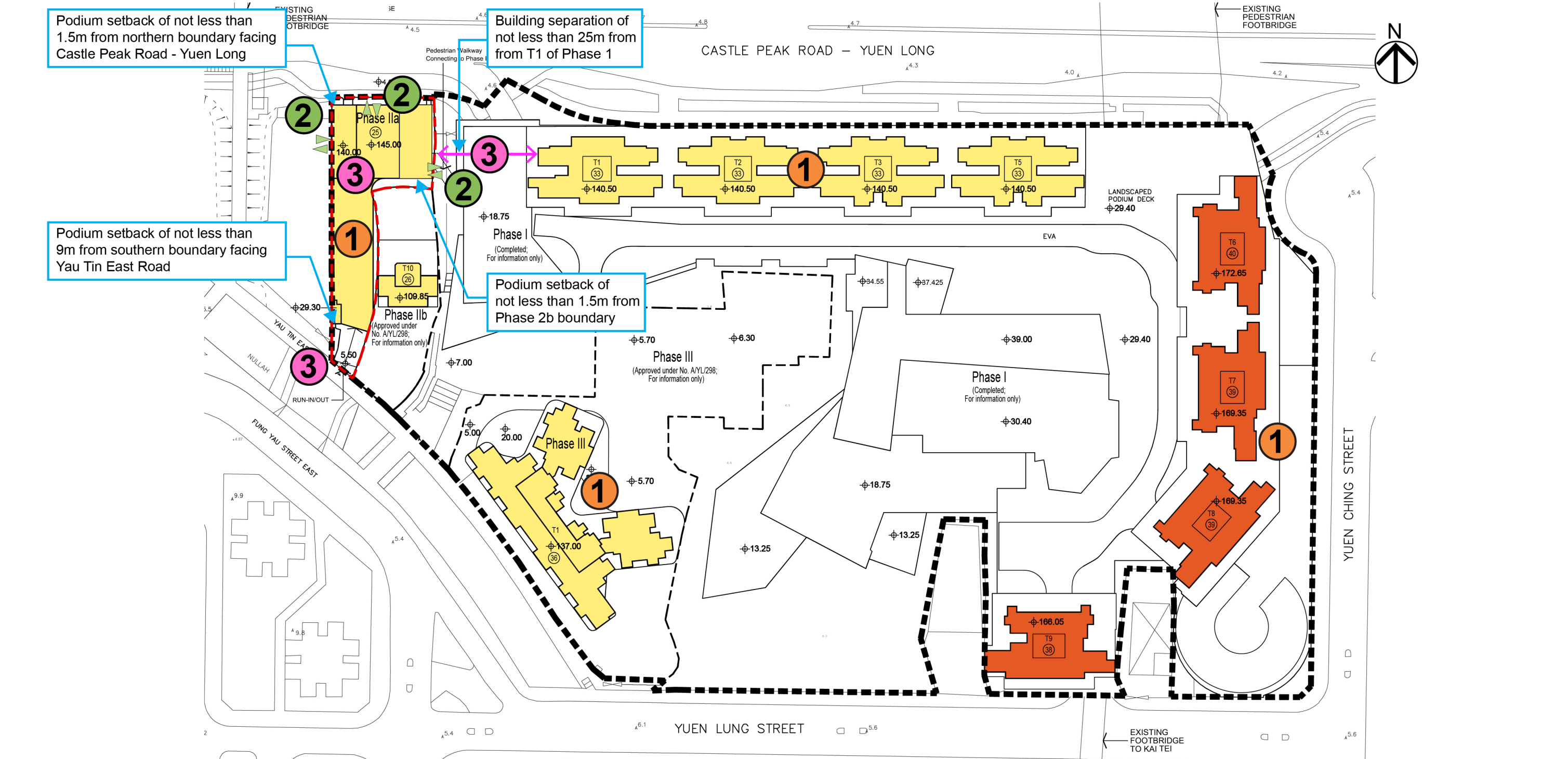
	Departmental Comments	Responses to Comments
3.3.3	(iii) the applicant has submitted a revised Landscape Design Proposal for the Phase IIa site in support of the application. According to the tree treatment schedule for the proposal, all existing trees (five trees including one mature tree T34) are proposed to be felled. With reference to the tree photos at Appendix V, T34 is in poor structural condition. The other four trees are in poor health/structural condition. Seven new trees, including two more tree species for enhancing biodiversity, are proposed to be planted within Site; and	Noted.
3.3.4	(iv) in view of the above, significant adverse landscape impact arising from the proposed use is not anticipated.	Noted.
3.4	<u>Advisory Comments</u>	
3.4.1	The following advisory comments should be noted:	
3.4.2	(i) As the Site falls within a “CDA” zone, the following approval condition is recommended to be included in the planning permission should the application be approved by the TPB: the submission and implementation of a Landscape Master Plan including a tree preservation proposal to the satisfaction of the Director of Planning or of the TPB.	Noted.
3.4.3	(ii) the applicant should be advised that approval of the application does not imply approval of tree works such as pruning, transplanting and felling. For compliance of site coverage of greenery requirements under PNAP APP-152, submission should be made to Buildings Department for comments and approval.	Noted.

	Departmental Comments	Responses to Comments
4.	Comments of Transport Department	
4.1	We have reviewed the further information. According to the TIA, the applicant will undertake the design and construction of the vehicular bridge across the existing nullah to provide access to the GIC site and Phase IIb in the future, and the access to the subject sites for the main site works will be via Fung Yau Street North. In this regard, we have no further comments on the captioned planning application from a traffic engineering perspective. As remarks, please note the following:-	No further comments on the planning application from traffic engineering perspective is well noted.
4.2	Yau Tin East Road is a single track road with heavy pedestrian traffic. It is currently designated as a prohibited zone, and vehicles shall not enter the road without permits.	Noted.
4.3	In general, permits will only be granted for the cases which are deemed necessary.	Noted.
4.4	It is expected that the applicant shall use the proposed vehicular access over the drainage channel as the construction access for the proposed building.	Noted.
4.5	The applicant shall phase their construction sequence with due consideration to aforesaid factors.	Noted.
5.	Comments of Environmental Protection Department	
	<u>Air Quality</u>	
5.1	Section 3.2.3	
5.1.1	Please delete “relevant” in line 4.	Noted. S3.2.3 has been revised accordingly. Please refer to the replacement pages of EA in Attachment 4 .

	Departmental Comments	Responses to Comments
5.2	Section 3.6.3	
5.2.1	Please add “as detailed in Section 5.2” after “good practices” in line 2.	Noted. S3.6.3 has been revised accordingly. Please refer to the replacement pages of EA in Attachment 4 .
5.2.2	Please add “and no adverse construction air quality impact is anticipated” after “controlled” in line 3.	Noted. S3.6.3 has been revised accordingly. Please refer to the replacement pages of EA in Attachment 4 .
5.3	Section 3.6.5	
5.3.1	Re. R-t-C #3.1.8(c), please relocate “and hence buffer distance requirement does not apply” in line 11 after “EVAs” in line 12.	Noted. S3.6.5 has been revised accordingly. Please refer to the replacement pages of EA in Attachment 4 .
	<u>Waste Management</u>	
5.4	Section 5.5.6	
5.4.1	As per the “Reduction of Construction Waste Final Report”, the C&D materials generation rate ranges from 0.125 to 0.25 cu.m per 1 sq.m GFA; a contractor even uses a rate of 0.2 cu.m per 1 sq.m GFA for commercial office projects. Please clarify the source of 0.1 cu.m per 1 sq.m GFA that is mentioned.	The source of reference and S5.5.6 have been revised. Please refer to the replacement pages of EA in Attachment 4 .
5.4.2	According to the submitted Planning Statement and the latest SIA report, the GFA is not more than 12,207 sq.m. Multiply that with 0.15 cu.m per 1 sq.m GFA should result in about 1,830 (not 1,760) cu.m of C&D materials to be generated. Please clarify.	Noted. S5.5.6 and relevant sections have been clarified and revised accordingly. Please refer to the replacement pages of EA in Attachment 4 .
5.4.3	Please clarify who published the “Reduction of Construction Waste Final Report”.	The source of reference has been updated and clarified in S5.5.6. Please refer to the replacement pages of EA in Attachment 4 .
5.4.4	1,760 m ² should read 1,760 m ³ . Please revise.	Noted. S5.5.6 has been revised. Please refer to the replacement pages of EA in Attachment 4 .

Attachment 1

Replacement Pages for Planning Statement



Legend

- Application Site (Same as approved Application No. A/YL/298)
- Phase IIa (Subject matter of current application)
- Phasing Boundary
- Level in mPD (Main Roof)
- No. of Commercial / Office / Retail / Residential Floors

1 Respecting Existing Building Height Variations of Approved CDA Development

Building height variations within the Application Site:

Building Height

150 mPD or above

Below 150 mPD

2 Enhancement to Walkability and Pedestrian Experience

Proposed connections between YOHO Mall 1 and the existing footbridge via the future development at adjoining GIC site* and potential connections between YOHO Mix and the Proposed Commercial Development* to enhance walkability.

*subject to detailed design and liaison with relevant departments/parties in future

3 Enhancement to Permeability as Far as Practicable

Sensible Building Setbacks and Separations from the Surrounding Environment

- Setback of the semi-enclosed carpark along the frontage abutting the nullah
- Building setback from Castle Peak Road – Yuen Long with a landscape strip provided
- Building separations from existing development (YOHO Midtown)

Design Measures within the Proposed Commercial Development

- Semi-enclosed ground level car park
- Multi-level landscaped spaces at G/F, Roof Floor and Top Roof Floor
- Refuge floor with voids at 18/F

5. VISUAL CONSIDERATIONS

- 5.1 A Visual Impact Assessment (VIA) has been conducted for the Proposed Commercial Development to assess the source and magnitude of the impacts of the Proposed Commercial Development on existing visual character and amenity in the context of the Application Site and its environs. The details of the VIA are provided in **Appendix C**.
- 5.2 Reference has been made to the VIA conducted for the Approved CDA Development (Application No. A/YL/298) and taking into account the latest surrounding development context, a total of six key public VPs have been selected to assess the overall visual impact of the Proposed Commercial Development, including:-
- VP1 – Eastbound of Castle Peak Road towards Yuen Long New Town
 - VP2 – Fung Yau Street North Sitting-Out Area
 - VP3 – Junction of Northbound Fung Yau Street East and Eastbound Yuen Lung Street
 - VP4 – Northbound of Yau Tin West Road
 - VP5 – Footbridge connecting YOHO Mall 1 and YOHO Mall 2
 - VP6 – Entrance of Kwong Ming Ying Loi School
- 5.3 The existing residential towers of YOHO Midtown are densely located to the east and southeast of Phase IIa Development Site. Public views from VP6 at entrance of Kwong Ming Ying Loi School towards Phase IIa Development Site is substantially blocked by YOHO Midtown development. Therefore, **no change to visual context from VP6 is expected, as the Proposed Commercial Development will be totally screened off by the existing YOHO Midtown development, given the viewing distance. The magnitude of change and overall visual impact of VP6 are negligible.**
- 5.4 As explained in the analysis in the VIA, and as illustrated on the photomontages taken at the selected VPs, **the overall visual impact associated with the Proposed Commercial Development at all other public VPs is negligible, negligible/slight or slight as compared with the baseline condition (i.e. with the Approved CDA Development in place).** With the incorporation of appropriate urban design measures, including incorporation of a refuge floor with voids to introduce breaks in building mass and promote visual permeability through the tower, adoption of a building height that conforms to the building height variations in accordance with the Approved CDA Development and surrounding developments, provision of building setback, sensible building separation with existing and planned developments and the provision of multi-level landscaped spaces, the Proposed Commercial Development will not impose any significant visual impact to its surroundings.
- 5.5 In conclusion, the Proposed Commercial Development will blend in with the overall visual environment and the overall visual impact will be negligible/slight.

Attachment 3

Replacement Pages for Traffic Impact Assessment

Ref.	Development Site	Land Use	Assumed Development Parameter
8	Proposed Conservation of Historic Building (Pun Uk) and Residential Care Homes for the Elderly (A/YL-NSW/292)	Heritage	Total GFA of 9,178.9m ² with 530 beds
9	Phase III of Approved CDA Development at "CDA" zone in Yuen Long Area 12 (A/YL/298)	Residential	Domestic GFA is not more than 34,190m ² with not more than 720 flats
10	CDA(1) Development at Cheung Chun San Tsuen (A/YL-KTN/604)	Residential	Total GFA of 179,838m ² with 3,891 flats
11	D.D. 115, Tung Shing Lei, Yuen Long (A/YL-NSW/274)	Residential	Total GFA of 70,328m ² with 1,518 flats
12	D.D. 115 at Chung Yip Road, Nam Sang Wai (A/YL-NSW/282)	Residential	Total GFA of 7,296m ² with 112 flats
13	Proposed Underground Public Vehicle Park Keung Yip Street, Tung Tau Industrial Area, Yuen Long (A/YL/290) ⁽²⁾	PVP & Sport Facilities	190 nos. of parking spaces
14	Phase II of Approved CDA Development at D.D. 107, Kam Tin, Yuen Long (A/YL-KTN/663)	Residential	Total GFA of 258,896m ² with 4,282 flats
15	Tung Shing Lei Phase 2 (LSPS/002)	Residential	Total GFA of 143579 sqm with 3129 flats (Public & Private portions combined)
16	Sha Po North Public Housing (S/YL-KTN/9)	Residential	Total of 16,300 flats

Note:

(1) The information was available from the public domain

(2) Although Planning Application No. A/YL/290 has lapsed, it has been included in the traffic forecast for a conservative assessment

4.3.2 Estimation of the traffic generation and attraction volume are derived from the trip rates as stipulated in Annex C of Transport Planning and Design Manual (TPDM) Volume 1 Chapter 3 published by Transport Department.

4.3.3 **Table 4.4** summarizes the estimated trip generations of the above Planned and Potential Future Developments.

Table 4.4 Estimated Trip Generation for the Planned / Potential Future Developments

Ref.	Development Site	Estimated Trips (pcu/hr)			
		AM Peak		PM Peak	
		Gen.	Att.	Gen.	Att.
1	Grand YOHO (A/YL/139-1)	49	29	20	27
2	YOHO Hub (A/YL/209)	90	64	58	70
3	Sol City (A/YL/188-1)	52	31	21	27

Ref.	Development Site	Estimated Trips (pcu/hr)			
		AM Peak		PM Peak	
		Gen.	Att.	Gen.	Att.
4	Park YOHO Napoli (A/YL-KTN/118-2)	12	7	5	6
5	Kam Tin South Development	2503	1552	1041	1304
6	Wang Chau & YLIE Extension(1) (DC 2016/80)	1003	954	796	817
7	Yuen Long South Development (PWSC(2025-26)3)	1221	1139	974	913
8	Proposed Conservation of Historic Building (A/YL-NSW/292)	5	5	5	5
9	Phase III of Approved CDA Development at "CDA" zone in Yuen Long Area 12 (A/YL/298)	60	38	26	37
10	CDA(1) Development at Cheung Chun San Tsuen (A/YL-KTN/604)	279	165	111	144
11	D.D. 115, Tung Shing Lei, Yuen Long (A/YL- NSW/274)	109	65	43	56
12	D.D. 115 at Chung Yip Road, Nam Sang Wai (A/YL-NSW/282)	763	434	521	647
13	Proposed Underground Public Vehicle Park Keung Yip Street, Tung Tau Industrial Area, Yuen Long (A/YL/290) ⁽¹⁾	25	6	4	15
14	Phase II of Approved CDA Development at D.D. 107, Kam Tin, Yuen Long (A/YL-KTN/663)	307	182	122	158
15	Tung Shing Lei Phase 2	203	131	90	119
16	Sha Po North Public Housing	704	528	386	491

Note:

(1) Although Planning Application No. A/YL/290 has lapsed, it has been included in the traffic forecast for a conservative assessment

4.4 Comparison of Traffic Generation of the Approved Scheme and Proposed Commercial Development

4.4.1 Based on the approved application, the adopted trip rates as well as the estimated trip rates and traffic generation / attraction for the Subject Site under Approved Scheme is presented in **Table 4.5** and **4.6** respectively.

Table 4.5 Adopted Trip Rate for the Subject Site under Approved Scheme

Land Use	Adopted Trip Rates (pcu/hr/guest room)				Note
	AM Peak		PM Peak		
	Gen.	Att.	Gen.	Att.	
Hotel	0.1329	0.1457	0.1290	0.1546	(1)

Note:

(1) Extracted from TPDM Volume 1 Chapter 3 Annex C, Hotel (mean)

Attachment 3

Replacement Pages for Visual Impact Assessment

6 Conclusion

- 4.1. This VIA is submitted to evaluate the degree of visual impacts on public viewers from major public VPs due to the Proposed Commercial Development at the Phase IIa Development Site as compared to the Phase IIa development of the Approved CDA Development.
- 4.2. Reference has been made to the Visual Analysis conducted for the Approved CDA Development (Application No. A/YL/298) and taking into account the latest surrounding development context, a total of 6 key public VPs have been selected to assess the overall visual impact of the Proposed Commercial Development, including:-
- VP1 – Eastbound of Castle Peak Road towards Yuen Long New Town
 - VP2 – Fung Yau Street North Sitting-Out Area
 - VP3 – Junction of Northbound Fung Yau Street East and Eastbound Yuen Lung Street
 - VP4 – Northbound of Yau Tin West Road
 - VP5 – Footbridge connecting YOHO Mall 1 and YOHO Mall 2
 - VP6 – Entrance of Kwong Ming Ying Loi School
- 4.3. The existing residential towers of YOHO Midtown are densely located to the east and southeast of Phase IIa Development Site. Public view from VP6 at entrance of Kwong Ming Ying Loi School towards Phase IIa Development Site is fully blocked by YOHO Midtown development. Therefore, **no visual change from VP6 is expected, as the Proposed Commercial Development will be totally screened off by the existing YOHO Midtown development, given the viewing distance. The magnitude of change and overall visual impact of VP6 are negligible.**
- 4.4. As explained in the analysis in preceding sections, and as illustrated on the photomontages taken at the selected VPs, **the overall visual impact associated with the Proposed Commercial Development at all other public VPs is negligible, negligible/slight or slight as compared with the baseline condition (i.e. with the Approved CDA Development in place).** With the incorporation of appropriate urban design measures, including incorporation of a refuge floor with voids to introduce breaks in building mass and promote visual permeability through the tower, adoption of a building height that conforms to the building height

variations in accordance with the Approved CDA Development and surrounding developments, provision of building setback, sensible building separation with existing and planned developments and provision of multi-level landscaped spaces, the Proposed Commercial Development will not impose any significant visual impact to its surroundings.

- 4.5. In conclusion, the Proposed Commercial Development will blend in with the overall visual environment and the overall visual impact will be negligible/slight.

Attachment 4

Replacement Pages for Environmental Assessment

- Air Pollution Control (Fuel Restriction) Regulations (i.e. using liquid fuel with a sulphur content of less than 0.001% by weight)
- Recommended Pollution Control Clauses for Construction Contracts

- 3.2.3 With the implementation of air quality control measures as stipulated under the APCO, Air Pollution Control (Construction Dust) Regulation (Cap 311R), controlling exhaust emission by following Air Pollution Control (Non-road Mobile Machinery) (Emission) Regulation and Air Pollution Control (Fuel Restriction) Regulations, as well as adoption of good site practices, fugitive dust and gaseous emission arising from the earthworks, etc. can be effectively controlled. Good site practices will be implemented through contractual clauses and close enforcement of the resident engineers. The Contractor(s) shall be required to follow the requirements of the Air Pollution Control (Construction Dust) Regulation which requires notification before carrying out demolition works or construction works and to adopt air quality control measures while carrying out demolition activities or construction activities.
- 3.2.4 Under the Air Pollution Control (Non-road Mobile Machinery) (Emission) Regulation, only approved or exempted non-road mobile machineries (including mobile generator, air compressor, crawler crane, bulldozer, and etc.) with a proper label are allowed to be used in the construction site.
- 3.2.5 For SO₂ emission, under Air Pollution Control (Fuel Restriction) Regulations, only liquid fuel with a sulphur content of less than 0.001% by weight are allowed to be used in the construction site.
- 3.2.6 The Recommended Pollution Control Clause for Construction Contracts available on the EPD website set out the recommended air pollution control measures to be implemented by the contractor(s) during the construction stage of the Project.

3.3 Existing and Future Predicted Air Quality

- 3.3.1 The Proposed Commercial Development Site is situated in Yuen Long district and the tentative completion year is 2030. Therefore, the year of 2030 background concentrations in Grid (26, 47) extracted from the PATH-v3.0 released by EPD in January 2024 has been adopted and shown in **Table 3.2**. The nearest general air quality monitoring station (AQMS) to the Proposed Commercial Development is the Yuen Long AQMS. The five most recent years of air quality monitoring data, 2021 to 2025, from this station are summarized in **Table 3.2**.
- 3.3.2 According to the AQMS monitoring data presented in **Table 3.2**, the exceedances in 24-hour average FSP concentration in 2022 and 2024, annual average FSP concentration between 2021 and 2025, and 8-hour average O₃ concentration in 2021, 2022 and 2024 were recorded. According to **Table 3.2**, there would be no exceedance of AQOs for the future background air quality pollutants except O₃.

- 3.5.4 The enquires on the odour-related complaints against the nullah close to the Phase II Development Site have been made to Environmental Protection Department (EPD). According to EPD's records for the period from 2020 to 2025, three complaints related to the nullah were received, in 2020, 2024 and 2025, respectively. For the complaints received in 2020 and 2024, EPD advised that it had been continuously following up on malodour issues arising from drainage misconnections in the Yuen Long area, had taken enforcement actions against illegal discharges to the Yuen Long East Nullah, and had referred any identified drainage misconnections to the relevant government departments for follow-up actions. The complaint received in 2025 was determined to be not substantiated. Other complaints related to Fung Kwan Street RCP, surface channel/drain/gullies on Yau San Street and Fung Yau Street South were all unsubstantiated. The relevant correspondences with EPD are shown in **Appendix 3.2**. Therefore, adverse odour impact on the Phase IIa Development Site would not be anticipated.
- 3.5.5 Based on the observation during the site survey and the nature of the Proposed Commercial Development, adverse odour impact is not anticipated on the proposed commercial development at the Phase IIa Development Site.

3.6 Potential Air Quality Impact arising from Proposed Commercial Development

Construction Phase

- 3.6.1 The potential air quality impacts during the construction phase and the mitigation measures where practicable for fugitive dust and gaseous emission during construction to be adopted would be further discussed in **Section 5**.
- 3.6.2 "Recommended Pollution Control Clauses for Construction Contracts" is available on the EPD website which set out the recommended air pollution control measures to be implemented by the contractor(s) during the construction stage of the Project.
- 3.6.3 With the implementation of control measures stipulated under the Air Pollution Control (Construction Dust) Regulation and the adoption of good practices as detailed in **Section 5.2**, it is expected that construction fugitive dust and gaseous emission can be controlled, and no adverse construction air quality impact is anticipated.

Operational Phase

- 3.6.4 Regarding the carpark of the Proposed Commercial Development which will be located aboveground, it will not be fully enclosed and natural ventilation is available to facilitate dilution of pollutants. In addition, mechanical ventilation system will be equipped and will satisfy the requirements, including design, maintenance and operation of the ventilation systems, stipulated in the *ProPECC PN 2/96 - Control of Air Pollution in Car Park*.
- 3.6.5 The proposed carpark is mainly used for private cars (PCs) with less than 60 parking spaces. The duration with vehicular emission (when engine is switched on) is limited. Hence, the emissions from the proposed carpark are much lower than other carparks that are more frequently used by GVs. At this early planning stage, the details and design for the mechanical ventilation system design is not yet available. The exhausted air outlet is tentatively located on northern façade towards Castle Peak Road – Yuen Long and southwest façade towards the nullah with horizontal separation of about 45m from the nearest air sensitive uses (Ho Shun Yee Building and Wing Fu Mansion) on the opposite side of the nullah. The tentative location for the proposed exhaust outlet is shown in **Figure 3.4**. Therefore, no adverse air quality impact from the proposed

carpark is anticipated. Moreover, all roads within proposed development are all categorized as EVAs and hence buffer distance requirement does not apply. No adverse air quality impact from the vehicular emissions of the proposed development is anticipated.

3.7 Conclusion

- 3.7.1 As confirmed in site survey, there is no existing and planned industrial source / chimney identified within 200m buffer distance and 500m assessment area from the Phase IIa Application Site. No adverse air quality impact from the industrial / chimney emissions is anticipated.
- 3.7.2 The Proposed Commercial Development will be designed so that there are no air-sensitive uses of the proposed commercial development, including openable window, fresh air intake and recreational use in open space, falling within the buffer zone (measured 20m from kerb side of Castle Peak Road – Yuen Long and 5m from kerb side of Yau Tin East Road) as stipulated in the HKPSG. No adverse air quality impact from the vehicular emissions is anticipated.
- 3.7.3 According to the findings from the site visit, adverse odour impact is not anticipated at the Phase IIa Development Site.
- 3.7.4 Control measures stipulated under the Air Pollution Control (Construction Dust) Regulation and good practices will be adopted during construction of the project. It is expected that construction fugitive dust and gaseous emission can be controlled.

5. CONSTRUCTION PHASE IMPACTS

5.1 Introduction

- 5.1.1 During the construction phase of the Proposed Commercial Development, the construction activities, including site clearance, demolition works of substructure and site formation works would be involved. There may be potential air quality, noise and water quality impacts upon the nearby sensitive receivers. Waste generation and sewage generation during construction phase is another consideration. Practicable environmental mitigation measures are recommended to reduce these impacts to acceptable ranges.

5.2 Fugitive Dust and Gaseous Emission Impact

- 5.2.1 The major air quality impact of concern during the construction phase will be the potential fugitive dust and gaseous emission. The major dust and gaseous emission sources during the construction phase of the development are expected to arise from construction activities during site formation stage such as:
- Earth moving, loading and unloading of excavated material;
 - Wind effect on material stockpiling; and
 - Vehicle movements on haul roads and over the construction site.
- 5.2.2 As there is no proposed basement in the project, the implementation of the project will not involve any excavation work for the basement. During superstructure construction, it is estimated that 245 m³ of non-inert waste and 2,205 m³ of inert waste will be generated. Assuming a period of 2 year for superstructure construction, there will be less than 1 truckload of construction waste generated per day. Necessary mitigation measures are recommended and will be implemented in order to avoid adverse fugitive dust impact.
- 5.2.3 There will be potential impacts from the criteria pollutants (e.g. nitrogen oxides (NO_x), sulphur dioxide (SO₂), and carbon monoxide (CO)). Emission from diesel trucks for the haulage of materials and construction plants will contain high percentage of smoke particulate and unburned hydrocarbons in comparison with petrol driven vehicles. Ultra-low sulphur diesel (ULSD) with sulphur content not exceeding 0.001% by weight will be used as fuel to minimize SO₂ emission. In all circumstances, the contractor will be required to observe all relevant regulations and maintain all equipment in good condition to avoid any excessive emission. Under the Air Pollution Control (Non-road Mobile Machinery) (Emission) Regulation, only approved or exempted non-road mobile machineries (including mobile generator, air compressor, excavator, crawler crane, bulldozer and etc.) with a proper label are allowed to be used in the construction site. Exempted NRMMs shall be avoided to minimize the particulate matters (PM) and gaseous emissions. In addition, availability of electricity supply during construction of the project will be explored and such requirement will be specified in future contract. If available, contractor should maximise use of electric non-road mobile machinery (NRMMs) and with least reliance of diesel fuelled equipment (e.g. for electricity powered stationary equipment such as pump instead of using generator).
- 5.2.4 There are sensitive uses located within 500m from the Phase IIa Development Site and considered as Air Sensitive Receivers (ASRs) and Noise Sensitive Receivers (NSRs). The planned RCHE+SCCC+Youth Hostel to the immediate west and approved subsidised sale flat (SSF) in Phase III to the southeast are being implemented and scheduled for completion by 2030.

non-inert C&D materials that cannot be reused or recycled should be disposed of at landfill as last resort;

- Inert C&D materials do not decompose (e.g. soil, rock debris, rubble earth, concrete, etc.) and is suitable to reuse as filling materials for land reclamation and site formation. Inert C&D materials could be reused on-site as filling materials. For those inert C&D materials that cannot be reused should be disposed at a Public Fill Reception Facilities.

- 5.5.4 The general waste management strategy is to avoid waste generation in the first place. If that is unavoidable, source reduction and segregation should be exercised as far as practicable and at the same time, recycling and reuse should be adopted to salvage as much as possible all the recyclable and reusable materials.

Waste Impact

- 5.5.5 Without any handling arrangement/ control measures in place, the storage, handling and disposal of general refuse have the potential to give rise to some environmental impacts. These include odour and hygienic problem if waste is not collected frequently, windblown litter, water quality impacts if waste enters water bodies, and visual impact. Chemical wastes arising during the construction phase may pose environmental, health and safety hazards if not properly labelled, packaged, handled, stored and disposed of in an appropriate manner. C&D material of different types may be mixed together, thus not possible to recycle C&D material subsequently and increase burden to landfill facilities.
- 5.5.6 As there is no proposed basement in the project, the implementation of the project will not involve any excavation work for the basement. According to "A Guide for Managing and Minimizing Building and Demolition Waste"¹, the C&D materials generation rate is in the range of 0.125m³ to 0.25m³ per 1m² of GFA. A waste index of 0.2m³ per 1m² of GFA has been adopted for the commercial office project and used as the reference for the Proposed Commercial Development. Accordingly, a total of C&D material of 2,450 m³ (~0.2 m³ per 1m² of GFA) is derived for this project. It is estimated that about 2,205 m³ of inert C&D material and 245 m³ of non-inert C&D material will be generated during superstructure construction. Adequate areas for sorting and storage of segregated materials should be provided onsite. Construction wastes shall be sorted, with the inert C&D material broken up into small pieces for disposal at public fill reception facility, and the non-inert C&D material should be disposed of at landfill.
- 5.5.7 To estimate the general refuse generated during construction phase, an assumption of 30 workers per day with 0.65 kg per worker per day has been made. **Table 5.4** presents the estimation of waste generated during construction phase.

¹ "A Guide for Managing and Minimizing Building and Demolition Waste" was published by Professor C. S. Poon, T. W. Yu, and L. H. Ng of The Hong Kong Polytechnic University.

Table 5.4 Summary Table of Estimated Waste during Construction Phase

Waste Material	Total Quantity Generated	Handling	Disposed offsite/reused and quantity
Inert C&D Material	~2,205 m ³	Sorted into inert C&D material and delivered to public fill reception facilities	~2,205 m ³ to be delivered to public fill reception facility (i.e. Tseung Kwan O Area 137 Fill Bank)
Non-Inert C&D Material	~245 m ³	Collected and segregated where practicable, and collected by/delivered to recycler	~50 m ³ to be collected by/delivered to recycler ~195 m ³ to be disposed of at designated landfill site (i.e. West New Territories Landfill)
General Refuse	~20 kg per day	Collected using adequate containers/bins for recyclable and non-recyclable wastes and provide onsite collection point for collection	Non-recyclable general refuse to be collected by refuse collection vehicle and disposed of at designated landfill site (i.e. West New Territories Landfill) Recyclable general refuse to be collected by/delivered to recycler
Chemical Waste	Anticipated to be limited (around some hundred litres at most)	Collected by licensed collectors	Chemical Waste Treatment Centre or equivalent

Note: The above estimated quantities are subject to the detailed design stage.

Waste Management Measures

- 5.5.8 The various waste management options are categorised in terms of preference from an environmental viewpoint. The options considered to be most preferable have the least environmental impacts and are more sustainable in the long term. The hierarchy is as follows. The waste management strategy is to avoid waste generation in the first place (i.e. in descending preference of the list below).
- Avoidance and reduction;
 - Reuse of materials;
 - Recovery and recycling; and
 - Treatment and disposal.
- 5.5.9 The following section describes the best management practices in construction site to avoid or further reduce the potential environmental impacts associated with the handling, collection and disposal of construction and chemical wastes arising from the construction of the Proposed Commercial Development.
- 5.5.10 Contractor will be required to develop and implement a proper waste management plan (WMP) according to the PNAP ADV-19. The WMP should include designation of areas for the segregation and temporary storage of materials for future use or