

Table R1: Response to Departmental Comments of EPD, DLO, SWD

Comments from Director of Environmental Protection

Comments from Director of Environmental Protection [Contact person: Ms. Winnie TANG (Tel: 2835 1096)]		Response
1	It is noted that Environmental Assessment (EA) (Issue 3) is submitted in support of the planning application. Nonetheless, updated EA (Issue 4) and Sewerage Impact Assessment (SIA) (Issue 5) for the same site have been submitted on 20 December 2024 to seek our comments.	Noted. Please find the latest EA in Appendix 1 .
2	As per clarification with the environmental consultant, Urban Green, via tele-conversation, we will review and provide comments on the updated EA (Issue 4) and SIA (Issue 5). Hence, attached please find our comments on EA (Issue 4) and SIA (Issue 5) for your reference	Noted. Please find our response to your comments below and relevant changes in Appendix 1 .
3	EPD's Comments on EA (Issue 4) and SIA (Issue 5) received on 20 December 2024 <u>General</u> Section 1.1.1.2: Please revise to read as " Draft Approved Tai Po Outline Zoning Plan (OZP) (OZP No.: A/TP/30)"	Noted and revised (Appendix 1).
4	<u>Air Quality</u> Section 3.2.1.3: <ul style="list-style-type: none"> - Please provide more supporting information e.g. the comparison between the estimated traffic flow of Tai Po Road – Tai Po Kau and other local distributors in order to justify the proposed buffer distances for Tai Po Road – Tai Po Kau. - Please move "The relevant minimum buffer ... is shown in Figure 3.2" and Table 3.2 to Section 3.7 and combine with Section 3.7.1.5. Then delete : "The relevant buffer ... and ASRs is summarized in Table 3.2"" 	<p>- Noted. Please refer to Section 3.2.1.3, 3.2.1.4 and Table 3.2 (Appendix 1).</p> <p>- Noted and revised. Please refer to Section 3.7.1.5 (Appendix 1).</p>
5	Table 3.3: Please add grid lines for clarity.	Noted and revised. Please refer to Table 3.3 (Appendix 1).
6	Table 3.5: There is no AQO for annual SO2. Please revise.	Noted and revised. AQO for 10 minutes SO2 is presented in Table 3.5 (Appendix 1).
7	<u>Noise</u> <i>Previous comment not addressed properly</i> Item 1 of the RtC under Noise: Given the TD had no comment on the methodology for traffic forecast only, the traffic consultant should confirm the traffic data is prepared based on the endorsed methodology and mention this in the EA report.	Noted. The traffic consultant has confirmed that traffic data is prepared based on the methodology which approved by TD. Please refer to Section 4.4.1.1 (Appendix 1).

8	Item 2 of the RtC under Noise: The proposed Type A acoustic window has 2 window openings while the reference case does not have the same nos. of openings. Therefore, it is not appropriate to directly apply the noise reduction of the reference case. Please consider the revised the design of the acoustic windows or apply correction factor for the additional window opening to obtain the noise reduction.	Noted. Correction factor +3dB(A) has been applied to all the room which using Type A acoustic window to calculate the noise reduction. Please refer to Appendix C1, C2 and D for the updated calculation (Appendix 1).
9	Item 6 of the RtC under Noise: Please revise the row name of “Inner Window Opening Width” and “Inner Window Opening Width” based on your input in the table.	Noted. Please refer to the updated Table 4.1 (Appendix 1).
10	<u>Comment on the revised EA report</u> Section 4.6.1.1: Please obtain the consent from the HyD for the proposed implementation and maintenance of LNRS on the Tai Po Road – Tai Po Kau Section. Our comment on the noise model is reserved upon receipt of the confirmation from the HyD.	Noted. The project proponent is seeking the consent from HyD, HyD’s reply will be attached once available (Appendix 1).
11	Section 4.6.1.7 and Section 4.6.1.8: <ul style="list-style-type: none"> - Please provide the brief comparison of the design of the proposed acoustic window with the reference design, such as the change the change of overlapping length, the to justify the noise reduction. - The noise reduction should be capped at noise reduction in the reference case and room size correction should only applicable to adjust the noise reduction downward. 	<ul style="list-style-type: none"> - Noted. Please refer to the updated Section 4.6.1.7 and 4.6.1.8 (Appendix 1). - Noted. Please refer to the revised Appendix D.
12	Table 4.1: The title of the table should be revised as “Key Configuration of Proposed Acoustic Window”.	Noted and revised (Appendix 1).
13	Section 5.5.3.1: <ul style="list-style-type: none"> - The sentence “Two reference chillers will be evaluated as a single set chiller to accurately represent the chiller system at the JIS will be utilized for the fixed noise calculation” is not understandable. Please revise accordingly. 	It is clarified that site observations confirmed that each of chiller set at JIS consists of two individual chillers, each equipped with six fan motors. To accurately represent the chiller system, two reference chillers (each with six fan motors) were combined and evaluated as a single chiller set (12 fan motors in total) for the fixed noise calculations. Please refer to the revised Section 5.5.3.1 (Appendix 1).
	<ul style="list-style-type: none"> - Please mention that the sound power level of the equipment for the PLK is obtained based on the equipment models identified during the site survey on 14 September 2024. 	Noted. Please refer to the revised Section 5.5.3.1 (Appendix 1).
14	Section 5.5.3.2: please delete the tonality correction and barrier correction as they are not provided in the equation.	Noted and revised (Appendix 1).
15	Section 5.5.3.3:	- Noted and revised. It is clarified that the “Cabsorption” in the equation mean “Cfacade”

	<ul style="list-style-type: none"> - Please clarify the whether the “Cabsorption” in the equation should mean “Cfacade”. 	and the formula has been revised accordingly (Appendix 1).
	<ul style="list-style-type: none"> - Please also add the correction for intermittency in IND-TM. 	- Noted and revised. Please refer to Section 5.5.3.4 for the correction for intermittency and correction for impulsiveness (Appendix 1).
	<ul style="list-style-type: none"> - For the barrier correction, please explain why the wavelength corresponding to 500Hz is selected in the calculation as the noise sources are in broadband spectrum. Alternatively, you can consider to apply a barrier correction of -5 dB(A) if the noise sources is screened off such that there is no direct line of sight to noise sources from the NSRs. 	- Noted. -5 dB(A) is applied for the barrier correction, please refer to the Appendix G for the updated calculation (Appendix 1).
16	Section 5.5.3.4: Please explain why the correction for impulsiveness and intermittency are not applied.	Noted. Please refer to the Section 5.5.3.4 for the explanation (Appendix 1).
17	Section 5.5.3.5: Please add the wording “and the noise sources are totally screened by the PLK Tin Ka Ping Primary School.” at the end of the 2 nd sentence.	Noted and revised (Appendix 1).
18	Section 6.2.1.1: The Practice Note for Professional Persons No. ProPECC PN No. 4/23 “Planning of Residential Developments Against Road Traffic Noise” is not relevant to construction noise and should be deleted.	Noted and revised (Appendix 1).
19	<p>Appendix D:</p> <ul style="list-style-type: none"> - The outer opening width, height and area of the “acoustic window (baffle type) (Type A)” in the “summary table of major parameters of AW(BT) as per ProPECC PN 5/23” is incorrect. - The noise reduction adopted should only be adjusted downward and please revise those higher than the reference value accordingly. 	<p>- Noted and revised. Please refer to Appendix D for the updated (Appendix 1).</p> <p>- Noted and revised. Please refer to Appendix D for the updated (Appendix 1).</p>
20	Appendix F: The monitoring location should be N1, N2 and N3 instead of NSR1, NSR2 and NSR3 respectively.	Noted and revised (Appendix 1).
21	<p>Appendix G:</p> <ul style="list-style-type: none"> - The measuring distance should depend on the information from the manufacturer based on how to sound pressure level in the catalogue was obtained instead of referring to the ISO 3745. 	- It is clarified that due to the lack of noise data from the available catalogues and manuals, reference equipment for ST(2/F), TY3 and TY4 which share the similar Cooling capacity, COP and size has been adopted for the calculation. Due to the result is similar to the previous calculation which following ISO 3745, The sound power level is sufficient to represent the proposed chiller (Appendix 1).

	<ul style="list-style-type: none"> - The sound power level of the chillers seems to be on low side. Please provide another catalogue of chiller with similar size to justify the proposed sound power level of the chillers in JIS is acceptable. 	- Noted. Please refer to the Appendix G for some other reference catalogue of chiller with similar size share the similar proposed sound power level of the chiller in JIS for supporting (Appendix 1).
22	<p><u>Water Quality</u> Section 7.2: Suggest to include ETWB TC(W) No. 5/2005 “Protection of natural streams/ivers from adverse impacts arising from construction works”</p>	- Noted. Please refer to the last item in the section 7.2.1.1 (Appendix 1).
23	Section 7.2.1.1 and Section 7.4.4.1: Please note that ProPECC NO 2/23 has been superseded by ProPECC PN 2/24. Please update all relevant sections accordingly.	Noted and revised (Appendix 1).
24	Section 7.2.1.2 (Rtc No. 1): Please clarify Port Shelter WCZ.	Noted and revised. It is clarified that it is Tolo Harbour WCZ instead of Port Shelter WCZ (Appendix 1).
25	Table 7.1:	- Noted, please refer to Table 7.2 for the Water Quality Objective for Watercourses in Tolo Harbour and Channel Water Control Zone (Appendix 1).
	<ul style="list-style-type: none"> - Please include Water Quality Objectives for Watercourses in Tolo Harbour and Channel Water Control Zone as well. - Please check if the WQO for salinity is accurate. 	- Noted and revised (Appendix 1).
26	Section 7.2.1.2, Section 7.3.1.2 and Table 7.3: please note that EPD’s River Water Quality in Hong Kong in 2023 has been published and update these sections.	Noted and updated accordingly. Please refer to Section 7.2.1.2, Section 7.3.1.2 and Table 7.4 (Appendix 1)..
27	Table 7.2 and Figure 7.1: With reference to EPD’s Hong Kong Environmental database (HKED), there are several watercourses in close proximity to the Project Site. Please review if they should be included as WSRs.	Noted and revised. Please refer to Figure 7.1 and Table 7.3 for the updated WSRs (Appendix 1).
28	Section 7.4.1.4: <ul style="list-style-type: none"> - 7th bullet: please remove “with backfill”. - 8th bullet: suggest to remove as repetitive with Section 7.4.2.1. 	Noted and revised (Appendix 1).
29	Section 7.4.3.3.: Suggest to remove as this paragraph as the Project does not fall with Water Gathering Grounds.	Noted and revised (Appendix 1).
30	Section 7.4.4: Please remove this Section and move the relevant points to under Section 7.4.1.4 for construction site drainage (without replicating the existing points).	Noted and revised (Appendix 1).
31	Section 7.5.2.3: <ul style="list-style-type: none"> - Best Management Practices (BMPs) for stormwater discharge to minimize storm water pollution arising from the Project shall be incorporated. 	- Noted and revised. Please refer to Section 7.5.2.3 (Appendix 1).

	- Suggest revise as “... to comply with the relevant regulations and guidelines (e.g. ProPECC PN 2/24). ”	- Noted and revised. Please refer to Section 7.5.2.3 (Appendix 1).
32	Section 7.5.2.4: Suggest revise as “With the abovementioned mitigation measures implemented, no adverse water quality impact is anticipated during both construction and operation phase.”	Noted and revised accordingly (Appendix 1).
33	Figure 7.1: Suggest to use different colours to represent WSR 7 and WSR 8 which are not watercourses.	Noted and revised. Please refer to updated Figure 7.1 (Appendix 1).

Comments from District Lands Officer/Tai Po, Lands Department

Comments from District Lands Officer/Tai Po, Lands Department [Contact person: Ms. Algie LEUNG (Tel: 2654 1187)]		Response
1	The application site comprises an Old Schedule Agricultural Lot (OSAL) held under the Block Government Lease which contains the restriction that no structures are allowed to be erected without the prior approval of the Government. The site does not fall within any village environs and is not covered by any MOT/ Building Licence. Existing, the site is vacant and two slope feature nos. 7/NE-C/C392(2) and 7/NE-C/C440(1) situated therein are affected.	Noted.
2	At present, no application for lease modification / land exchange application has been received by this office. Should the Town Planning Board approve the subject planning application, the lot owner(s) is required to submit a lease modification / land exchange application to LandsD to implement the proposed development. The application, if any, will be considered by the LandsD acting in the capacity of the landlord at its sole discretion and there is no guarantee that such application will be approved. If such application is approved, it will be subject to such terms and conditions, including among others the payment of premium, as may be imposed by the LandsD.	Noted.
3	According to para. 8.5.4 of the Planning Statement, the Applicant proposed two schemes to facilitate the site formation works of the application site, viz. either remove (Scheme 1) or retain (Scheme 2) slope feature no. 7NE-C/C403 which wholly falls within the adjoining Tai Po Town Lot No. 156. Since the slope feature falls within a private lot and is maintained by the concerned lot owner(s), consent/agreement from the lot owner(s) shall be obtained prior to any removal or strengthening works and/or interference as proposed in both schemes.	Noted.
4	I would leave the relevant departments to offer comments on the technical impact assessments attached to the planning application, namely Landscape Proposal at Appendix 2, Traffic Impact Assessment at Appendix 3, Visual Impact Assessment at Appendix 4, Geotechnical Planning	Noted.

	Review Report at Appendix 5, Environmental Assessment at Appendix 6 and Sewerage Impact Assessment at Appendix 7 thereto.	
5	According to para. 2.1.2 of the Planning Statement, the Applicant advised the application site has an area of about 2,191.3m ² . However, our records revealed that the registered site area of the lot is 2,210.2m ² . The area of the application site and other details submitted by the Applicant have not been verified.	<p>A certified land surveyor was engaged in the project team to determine the lot boundary. The site area was found to be (about) 2,191.3m² by initial measurement (which is slightly smaller than 2,210.2m² by less than 1%). Therefore, it was appropriate to be used in the TFS and in the current planning application as a conservative estimate.</p> <p>Should the subject planning application be approved, a lease modification / land exchange application will be submitted to LandsD to implement the proposed development. The site area will be subject to detailed survey and verification at that stage.</p>

Comments from Social Welfare Department

Comments from Project Planning Section (Team 2), Planning & Development Branch, Social Welfare Department [Contact person: Ms. Sami HUI (Tel: 3575 8427)]		Response
1	<p>HKSKH's Development Proposal</p> <p>The application site (about 2 191.3 m²) falls within an area zoned "Government, Institution or Community (G/IC) on the approved Tai Po Outline Zoning Plan No. S/TP/30 and is subject to a maximum building height of eight storeys. Currently, the site is vacant and occupied by a massive hummock.</p>	Noted.
2	<p>A Lotteries Fund grant of \$5.394 million was approved in January 2021 for HKSKH to conduct a technical feasibility study (TFS) for the development of the site, and the TFS is now underway. According to HKSKH's application, a 10-storey building with two levels of basement (as carpark, sewage treatment plant and supporting facilities) with an estimated total GFA of about 12 521.1 m² will be built on the site for the provision of the following facilities –</p> <p>Welfare facilities on the "Shopping List" on a subvention basis</p>	Noted.

	<p>a) a 289-place Care and Attention Home for the Elderly with Continuum of Care (including 240 subvented and 49 self-financing places);</p> <p>b) a subvented 100-place Special Child Care Centre;</p> <p>c) an aided 65-place Child Care Centre;</p> <p>d) a subvented 30-place Small Group Home;</p> <p>Other Welfare Facilities</p> <p>e) a subvented Foster Care Services and Agency based Enhancement of Professional Staff Support Services; and</p> <p>Welfare-related ancillary to be operated on a self-financing basis</p> <p>f) a Staff Training Unit (STU).</p>	
3	<p>s.16 Planning Application</p> <p>3. To give effect to the proposed development, HKSKH has made a s.16 application to the Town Planning Board (TPB) for seeking planning permission for minor relaxation of the building height restriction from 8 storeys to 10 storeys for the G/IC site.</p>	Noted.
4	<p>We consider that HKSKH's development proposal is support-worthy as the proposed welfare facilities will meet the existing and future service demand for elderly, child care and rehabilitation services, and is in line with the government's policy as well as the intention of SSS. Thus, we support HKSKH's s.16 Planning Application.</p>	Noted.
5	<p>It is noted that the service proposal and layout plans are the same as those submitted by HKSKH under its 3rd draft of TFS report dated 31.10.2024, and SWD's and ArchSD's comments were provided to HKSKH on 13.12.2024 for review. HKSKH should duly address our previous comments and revise its planning application accordingly. Specifically, HKSKH's attention is drawn to the following -</p>	Noted.
	<p>(i) Para 5.3.1 and Para 5.3.2 of Code of Practice for Residential Care Homes (Elderly Persons) June 2024 (Revised Edition) stipulate that under section 20 of the Residential Care Homes (Elderly Persons) Regulation, no part of an RCHE shall be situated at a height more than 24 m above the ground floor, measuring vertically from the ground of the building.</p>	<p>Only ancillary facilities of RCHE are situated at a height more than 24m above the ground floor, to which the residents normally do not have access. The arrangement of CoC home is subject to detail design in TFS submission.</p>
	<p>(ii) Inconsistencies (e.g. development parameters and programme) were found between the planning statement and TFS report. Please review.</p>	<p>Regarding the calculation of GFA, please be advised that it is assumed in this planning submission that GFA equals to Construction Floor Area (CFA), i.e. no GFA concession. Normally the actual GFA will not exceed CFA.</p>

	The development parameters and programme are subject to detailed design and to be approved in TFS submission.
(iii) Please revise the supporting planning statement p.9 (Appendix I);	P.9 of the Planning Statement is amended accordingly (Appendix 2).
(iv) Please note that the short form of the scheme is "Special Sites Scheme." (p.10) (Appendix II);	P.10 of the Planning Statement is revised accordingly (Appendix 2).
(v) Spelling mistakes are found and relevant pages are extracted. Revisions are marked in RED (Appendix III). Please revise.	Suggested changes are incorporated into the Planning Statement (Appendix 2).