

Proposed Minor Relaxation of Plot Ratio (PR) and Site Coverage (SC) for Proposed Social Welfare Facility (Residential Care Home for the Elderly) (RCHE(s)), Training Centre with Residential Institution and Permitted Residential Development (Flat) in Lot 94 in D.D. 388 and adjoining Government land, Castle Peak Road – Tsing Lung Tau, Tsuen Wan (Application No. A/TWW/129)

Response-to-Comment Table

Departmental Comments		Responses
6 September 2024 refers:		
Architectural Services Department:		
1	Based on the information provided, it is noted that the proposed development mainly consists of one building block with an overall plot ratio (PR) of 5.73 (an increase from permitted PR of 2.1) and site coverage (SC) not exceeding 95% (an increase from permitted SC of 17.5%). From the Visual impact Assessment provided, it appears that the proposed development may have some visual impact to the surrounding environment, especially as shown in Figure 4. Noting that the applicant has proposed to provide a building setback and a delicate façade design on form, colour and greenery at the later design stage to increase visual interest of the proposed development, we have no comment from architectural and visual impact point of view, subject to PlanD’s view.	Noted.
Departmental Comments		Responses
6 September 2024 refers:		
Highways Department:		
1	In Figure 3.1 of Traffic Impact Assessment, part of the left-turn road marking falls within the lot boundary. Please review the location of the road marking, in order to clearly demarcate the maintenance responsibility. Besides, it seems that the provision of tactile warning tile does not follow the prevailing standards. Please seek comment from	The location of road marking “TURN LEFT ARROW” is proposed to be shifted some 1m to the south. In addition, the tactile warning tiles are provided at the pedestrian crossing. Please refer to the Figure R1 in the Attachment 1 .

	Transport Department on the proposed road layout; and	
2	It is noted that the existing ramp of highway structure no. NF437 is proposed to be modified. Please provide the detailed design and calculations to our Bridges and Structures Division for comment.	Please refer to the Attachment 2 for the Footbridge Design Checking Report. Please note that this same set of documents was previously submitted and reviewed as part of the approved planning application (A/TWW/122), where the relevant departments found these designs and calculations acceptable at the planning stage. There have been no material changes to the proposed modification of the existing ramp (highway structure no. NF437) between the previous approved application and the subject application.

Departmental Comments		Responses
13 September 2024 refers:		
Environmental Protection Department:		
1	<u>From AQ Perspective</u> Section 1.2.4: Please delete "not" in the sentence.	Please refer to the Attachment 3 for the Revised Environmental Assessment. Noted and deleted.
2	Section 2.4.1 and Figure 2.2: Please display the location of the access road (mentioned in line 3) on the figure. According to Appendix 4.1, there is one road (L019/L020, Local Road I, 100+150 veh/hr) to the north of the project site and another road (L011/L012, Access Road of Hong Kong Garden, 150+400 veh/hr) to the east of the project site. As the traffic volumes on these two roads cannot be considered limited, a buffer distance of more than 5 m is recommended between the road kerb and any ASRs of the proposed	Noted and Figure 2.2 amended. Noted. A conservative approach is adopted and buffer separation from access road of Hong Kong Garden is also considered. S2.4.2 and Figure 2.2 amended.

	<p>development. This is to ensure that vehicular emissions do not result in any adverse air quality impacts on the proposed development and please note that private road is not a reason for not following the buffer requirement.</p> <p>Please show the buffer zones for all relevant roads on the figure to demonstrate that no air-sensitive uses of the proposed development are located within these buffer zones.</p>	
3	Section 2.4.2: Please revise "truck" in the second last line to "trunk".	Noted and revised.
4	Section 2.5.1: TSP is no longer a criterion under the updated EIAO-TM for assessment. Please revise.	Noted and the sentence related to TSP is deleted in S2.6.1 .
5	Section 2.5.2: Please provide more details about the construction activities associated with the proposed development and note that the potential air quality impact from the construction works shall not be limited to dust impact. The information to be provided should include but is not limited to: the size of the site formation or excavation area, amount of excavated materials to be handled, number of construction trucks and mechanical equipment to be used per time over the work site, identification of any concurrent projects within 500 m from the project site boundary and their cumulative air quality impact.	S2.6.3 to S2.6.5 are revised to supplement. It is noted that there is no concurrent project are found within 500m from the project site boundary.
6	Section 2.5.5: Please revise "dust" in the sub-section title, lines 2 and 4 to "dust and gaseous". Please delete the second "dust" (after "sufficient") in line 2. Please revise "dust reduction measures" in the second last line to "air quality control measures". Please clarify whether there are any demolition activities or revise the last sentence accordingly.	Noted and S2.6.7 revised.

7	<p>Section 2.5.6: Please delete "dust" in line 1.</p> <p>Please consider including the following mitigation measures:</p> <p>i) Locate all the dusty activities away from any nearby ASRs as far as practicable.</p> <p>ii) Avoid using exempted NRMMS.</p>	Noted and S2.6.8 revised.
8	Section 2.5.8: Please revise "emission of construction fugitive dust" to "construction fugitive dust and gaseous emissions" in the last 2 lines.	Noted and S2.6.10 revised.
9	Section 2.6.1: Please revise "significant" in the last line to "adverse".	Noted and S2.7.1 revised.
10	According to the layout plans presented in Appendix 1.1, there will be a kitchen on G/F and car parking spaces in the basement. Please present the locations of the exhaust outlets for these facilities on a map and confirm that the exhaust air will be discharged to the atmosphere at such a location as not to cause a nuisance to any air-sensitive uses of the proposed development or other existing and planned ASRs.	Noted and tentative exhaust location added to Fig 2.4 . S2.5 added to discuss.
11	Figure 2.1: Please note that the buffer zone along the road kerb of Castle Peak Road-Tsing Lung Tau shall be shown instead of providing a separation distance of 12 m from a specific location of the road kerb of the road.	Noted and buffer zone shown in Fig 2.2 instead.
12	Figure 2.3: Please indicate the separation distances between each ASR and the project site boundary.	Noted and revised.
13	<p><u>From Noise Perspective</u></p> <p>We spotted the following error in the noise model. Please address:</p> <ul style="list-style-type: none"> - TD's endorsement of traffic forecast data is not available. Please supplement. 	Noted and supplemented in App4.1 .

	<ul style="list-style-type: none"> - Parameter of post speed should provide in Appendix 4.1 for checking against with model. Please rectify. - Segment width was not set at 3.5m for correct source location. Segment ID 239 to 244 and 254 and were set at 5m. Please check and rectify. - Please check whether cantilevered barrier should be added to the noise model along Tuen Mun Road. (See attached file: Noise Barrier along TM Rd. jpg) - From our spot check, the excel table contains minor calculation mistakes. Please check the result and rectify. (See attached file: Calculation incorrect formula. jpg) - Appendix 5.2 For Unmitigated scenario, please justify why the values of (-10.0 dB(A)) for parameter of 'barrier correction' for correction factors are applied into some calculations. And please justify why some plants are in standby mode. 	<p>Noted and supplemented in App4.1.</p> <p>Noted and revised.</p> <p>Given that the building height of the Proposed Development is lower than the elevation levels of Tuen Mun Road, it is considered that the natural topography could provide sufficient screening effect to the Proposed Development. As such, the cantilever barriers along Tuen Mun Road would not be incorporated into the noise model for simplification and conservatism.</p> <p>Noted and revised.</p> <p>A barrier correction of -10dB(A) will be provided to the fixed noise source when the direct line of sight is substantially blocked. For example, FN6-1 does not have direct line of sight to CT1, so a barrier correction of -10dB(A) is provided to CT1. According to the information provided from the operation staff of the HKGCC, only 3 cooling towers are in operation at the same time, which either CT1 or CT2 will be in operation mode.</p>
14	<p><u>From Waste Management and Land Contamination Perspective</u></p> <p>General – There is no evaluation of the waste management implications of the Project. The Consultant is advised to identify and evaluate the corresponding implications accordingly.</p>	<p>Noted and added to S6.7.</p>

15	<p>Para. 1.1.3</p> <p>(a) In addition to the impact from the operational phase, please review whether the impact arising from the construction phase shall be assessed in this EA Report.</p> <p>(b) Please review whether the waste management implications of this Project during construction and operational phases shall be assessed and evaluated in this Study. If affirmative, please supplement the relevant findings for our further review.</p>	<p>(a) Impact arising from the construction phase is included in S6.7.</p> <p>(b) S6.7 is added for supplement.</p>
16	<p>Para. 1.4.7</p> <p>(a) For clarity, please specify the occupation period of the acid factory.</p> <p>(b) The Consultant is advised to supplement the mentioned EAR for reference and further review.</p> <p>(c) Please clarify whether the EAR (A/TW/122) has been previously approved. If affirmative, please enclose the email correspondence for EAR approval for the record.</p> <p>(d) Please revise “historic” to “historical” for clarity</p>	<p>(a) There is no information on the extract occupation period of the acid factory. The assumption of the occupation period according to the observation on aerial photos and topographic map is stated in S6.3.</p> <p>(b) Noted and the mentioned EAR for last planning application will be provided separately for your reference and further review.</p> <p>(c) It is clarified that the EAR (A/TW/122) has been previously approved. App1.2 is added for supplement. S1.1.3 amended for clarity.</p> <p>(d) Noted and revised.</p>
17	<p>Para. 6.2.2 - It was stated in the first sentence that the Application Site was previously occupied by an acid factory, as advised by the Project Applicant. The Consultant is advised to elaborate further on (i) the occupation period, (ii) operation and routine operation procedures, (iii) the exact location of the factory, and (iv) any potential spillage and leakage of chemicals and dangerous goods at the acid factory.</p>	<p>The acid factory was occupied before 1963 and demolished in about 1989 according to aerial photos and topographic map. There is no other information related to the acid factory from lot owner or internet. However, further site appraisal and soil sampling will be done to determine whether the site is contaminated.</p>

18	<p>Table 6.1</p> <p>(a) Please revise “unknow building structure” to “unknown building structure” to avoid confusion.</p> <p>(b) Please be advised that Aerial Photographic Record ID: E194362C covers only the site condition in Year 2023. Please revise the last row from “2023 & now” to “2023” to avoid confusion.</p> <p>(c) According to the aerial photographs from Year 2018 to Year 2023, the site was vegetated instead of vacated. Please review and update the description in Table 6.1 to avoid confusion.</p>	<p>(a) Since it is understood there the site was occupied by acid factory before and only building structure can be identified within the period from 1963 to 1989, the building in this period is assumed as the acid factory.</p> <p>(b) Noted and revised.</p> <p>(c) Noted and revised.</p>
19	<p>Appendix 6.1</p> <p>(a) The Consultant is advised to incorporate the scale bar and north arrow on each aerial photograph for clarity.</p> <p>(b) To tally the description in Table 6.1, please revise “General Storage Area” to “Open Storage Area” in Year 2017 to avoid confusion.</p> <p>(c) According to the aerial photographs from Year 2018 to Year 2023, the site was vegetated instead of vacated. Please review and update the description for the concerned records to avoid confusion.</p>	<p>(a) Noted and added.</p> <p>(b) Noted and revised.</p> <p>(c) Noted and revised</p>
20	<p>Para. 6.3.2</p> <p>(a) To align with the description in Table 6.1, the Consultant is advised to revise the first sentence as follows: “These records revealed that the Site is was occupied by unknown building structures before in 1963 and the structures was were demolished in about the late 1980s and became vacant in 1990.”</p>	<p>(a) Noted and revised.</p>

	<p>(b) Please update the second sentence as follows: “Open storage area for the storage of unknown material were observed from 2000 to 2017”.</p> <p>(c) In addition to the review of aerial photographic records, the Consultant is advised to acquire other sources of information to identify and evaluate the land contamination of the Project Site. Please review whether the Google Street View could provide additional information on the identity of the materials stored within the Project Site (i.e., https://www.google.com.hk/maps/@22.3609096,114.042641,3a,25.2y,312.52h,85.38t/data=!3m7!1e1!3m5!1s0hK0bWCFIKi_OaHdJivclQ!2e0!5s20090401T000000!7i13312!8i6656?coh=205409&entry=tту&g_ep=EgoyMDI0MDgyOC4wIKXMDSOASAFQAw%3D%3D)</p> <p>(d) Please review whether the Site was vegetated or vacated after Year 2018 and update as appropriate.</p>	<p>(b) Noted and revised.</p> <p>(c) Noted and reviewed.</p> <p>(d) It is considered that the site was covered with vegetation after 2018. S6.6.1 updated.</p>
21	<p>Para. 6.3.3 – The last sentence, “Given that there is no detailed information of the unknown building structures and the open storage area up to the report submission date”, is incomplete and confusing. The Consultant is advised to carefully review and update the description to avoid confusion.</p>	<p>Noted and revised.</p>
22	<p>Para. 6.4.1</p> <p>(a) According to the response from EPD enclosed in Appendix 7.2, please revise the second sentence as follows: “As replied by EPD, there was no record of registered chemical waste producer registration or chemical waste spillage / leakage incident accident record onsite.”.</p>	<p>(a) Noted and revised.</p>

	(b) The responses from LandsD and PlansD are enclosed in Appendix 7.2. Please review the accuracy of the second last sentence, “There is no update from Lands Department and Planning Department has confirmed that the Site is vacant currently” and update as appropriate.	(b) Noted and revised.
23	Appendix 7.2 – For clarity, the Consultant is advised to incorporate the locational plan enclosed in all enquiry letters.	Noted and added to App6.2 .
24	Para. 6.5.1 – Please be advised that the site photographic records taken from the plan view at the roof of the adjacent building could not accurately show the site condition of the Application Site. The Consultant is advised to revisit the site and supplement representative records taken from the at-grade level (i.e., there is a road entrance near Castle Peak Rd-Tsing Lung Tau).	App6.3 is added to supplement. Please note that there is dense and tall vegetation.
25	Para. 6.5.2 – Please be advised that the tree canopy blocked the line of sight to the Application Site. The Consultant shall revisit and re-evaluate the site conditions and land use at the ground level for clarity. We reserve the right to offer further comment on the conclusion of the site appraisal.	App6.3 is added for supplement. Please note that there is dense and tall vegetation.
26	Chapter 6 – The Consultant is advised to incorporate an additional subsection (i.e., in between the existing Section 6.5 and Section 6.6) to assess and evaluate the land contamination potential of the Application Site, with reference to the finding of the desktop review and site survey.	Noted and S6.6 is added to supplement.
27	Section 6.6 – Please update the conclusion section as per the comments above. The Consultant is also reminded to carefully review the necessity for intrusive site investigation in the subsequent stage of assessment, particularly on the nature and potential contamination	Noted and updated.

	<p>operation at the former acid factory. If affirmative, please review whether the submission of CAP will be required. Subject to the assessment outcome, the Contamination Assessment Plan (CAP) and, subsequently, the Contamination Assessment Report (CAR) and Remediation Action Plan (RAP) may be required in later stages to identify the potential land contamination issues in the Subject Site. The land contamination assessment and remediation works shall be completed according to EPD guidelines before any construction works for the development.</p>	
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Departmental Comments		Responses
<p>13 September 2024 refers: Social Welfare Department:</p>		
1	<p>In view of the ageing population and high demand for residential care services for the elderly in the community including the existing service demand in Tsuen Wan West, subject to the views from other Government departments on town planning and land use, we have generally no objection in principle for the setting up of the proposed residential care home for the elderly which is running in private / self-financing nature and with no financial implication, both capital nor recurrent to the Government, at the captioned site.</p>	Noted.
2	<p>The applicant / AP should also ensure that the proposed RCHE should be in full compliance with statutory and licensing requirements including but not limited to those stipulated in the Residential Care Home (Elderly Persons) Ordinance and its subsidiary legislation, as well as the latest version of the Code of Practice for the Residential Care Homes (Elderly Persons) [CoP]. Should the applicant intend to apply for the Incentive Scheme, the applicant should note that all the requirements of the</p>	Noted. The proposed RCHE to be in full compliance with statutory and licensing requirements.

	Scheme shall be complied with.	
3	<p>While examining the proposed development scheme (layout plan) and planning statement, we would like to point out some observations as follows –</p> <p>According to para. 5.3.1 and 4.4.3 of CoP, "no part of an RCHE shall be situated at a height more than 24 metres above the ground floor" and "the ceiling (the ceiling slab or suspended false ceiling) of every room shall be situated at a height not less than 2.5 m measuring vertically from the floor or not less than 2.3 m measuring vertically from the floor to the underside of any beam". As showed on the layout plan, the floor to floor height is 3150 mm. The applicant should also take note that sufficient buffer is required for each floor for placing for example building services facilities or false ceiling with a view to complying with the ceiling height requirements.</p>	The height requirement is noted, sufficient buffer to be allowed in future design.
4	A 8-storey of RCHE is proposed in the application and the total number of bed is 284 (i.e. 3/F: 70; 4/F: 70; 5/F: 68; 6/F: 42 & 7/F: 34), which is different from the application stating 240 - 320 beds. Please clarify.	The range of the total number of bed is proposed for future flexibility to the operator.
5	An end-of-life care room with NOFA of 13.5 sq.m. is indicated on the Schedule of Accommodation (SoA) but was found missing on the layout plan.	The said room to be allowed in the future design to suit the operation need.
6	Please clarify the purpose of "Rehab Facilities with NOFA of 50 sq.m.", "Rehab Facilities with NOFA of 200 sq.m." and "Rehabilitation with NOFA of 250 sq.m." on 2/F.	The rooms to be defined for different types of rehabilitation treatments to suit the future operation need.
7	Please note that the "Training Facilities cum Student Dormitory" on 2/F is a not a standard item under the SoA nor an essential facility in RCHE, this area could not be counted as the RCHE area and would not eligible for exemption of land premium.	Noted.

8	As stated in the proposal, natural lighting and ventilation will be provided for habitation area including dormitory, end-of-life care room and sick room. That say, openable and prescribed windows should be provided.	Noted, openable and prescribed windows to be provided for the said rooms.
9	It is noticed that balcony is attached in some dormitory rooms on 5/F to 7/F. Please confirm whether the balconies could be accessed to by the residents or for maintenance purpose.	The balconies are connected with the residents of singe bed rooms.
10	Common Areas (Small Group Activities Rooms) were marked on 3/F to 7/F. If these rooms are categorised as Small Group Activities Rooms, please remove "Common Area" on the layout plan and make these rooms as cellular rooms.	The "common area" to be removed and movable partition would be provided for these rooms. Please refer to the Attachment 4 for th revised Development Scheme.
11	Please advise the level of care for the proposed RCHE.	The proposed RCHE would register as C&A home and plan to accept case of all care levels, from mild, moderate to severe grade of impairment.
12	As stated in para. 4.3.1 in the planning statement, the proposed RCHE(s) can be managed and operated by more than one licensed RCHE operator. It is observed that only one RCHE is proposed in the applicant. Hence, it should be a RCHE instead of RCHE(s). Furthermore, please be reminded that one RCHE should be operated by one licensed RCHE operator.	It is confirmed that there would be only one RCHE and will be operated by one licensed RCHE operator.
13	Furthermore, the proposed footbridge on 2/F of the RCHE is not required or necessary for RCHE according the CoP or SoA. However, it may be convenient for some users of RCHE as well as other users from the composite building. The operator of the RCHE should be responsible for the management, safety and control of the entrance of the footbridge.	Noted.

Departmental Comments		Responses
13 September 2024 refers:		
Transport Department:		
1	The applicant shall submit and obtain approval from TD and HyD for	<u>#1 Sightline</u>

	<p>design of vehicular access for the proposed development. The applicant should ascertain actual site constraints will not affect the sightline for the motorist leaving the proposed development and should ascertain motorists entering/leaving the proposed development will not be affected by maneuvering of good vehicles at the loading/unloading bay at G/F.</p>	<p>The measured length of visibility splay for the motorists leaving the Proposed Development is 70m to the left which is illustrated in Attachment 1 - Figure R1.</p> <p><u>#2 Traffic Operation on G/F</u></p> <p>In order to minimise the affect of the maneuvering of HGV, the road marking "GIVE WAY" is proposed to be provided on G/F, which is shown in Attachment 1 - Figure R2. The swept path of traffic operation is shown in Attachment 1 - Figures R-SP1 and R-SP2.</p>
2	<p>The applicant shall submit and obtain approval from TD and HyD for the modified footbridge ramp in front of the application site and the proposal of re-routing and temporary ramp facilities during the footbridge modification works.</p>	<p><u>#1 Detail Design of modified footbridge ramp</u></p> <p>Please refer to the Attachment 2 for the design and calculations. Please note that this same set of documents was previously submitted and reviewed as part of the approved planning application (A/TWW/122), where the relevant departments found these designs and calculations acceptable at the planning stage. There have been no material changes to the proposed modification of the existing ramp (highway structure no. NF437) between the previous approved application and the subject application.</p> <p><u>#2 re-routing of pedestrian with disabilities</u></p> <p>During the footbridge modification work, pedestrians with disabilities can use the lifts to reach the upper level of existing footbridge NF437 when they need to cross over to Castle Peak Road – Tsing Lung Tau which is illustrated in Attachment 1 - Figure R3.</p> <p><u>#3 Temporary ramp facilities</u></p> <p>Since the footbridge modification works will be conducted after the completion of construction work of lifts on existing footbridge NF437, the provision of temporary ramp facilities is not considered.</p>