

**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
<p><b>2 October 2024 refers:</b>  <b>Urban Design Unit, Urban Design &amp; Landscape Section:</b></p>	
<p>1 The applicant may wish to clarify the following:</p> <p>a. It is noted that permeable opening at G/F along NW-SE axis is proposed in the AVA (para. 3.2.1 of AVA refers) without discussion in the PS. Please clarify with demarcation on relevant layout/ section plan(s).</p> <p>b. The location and dimension of the proposed building setbacks indicated in the PS and layout/ section plans are inconsistent. Please indicate the range of the dimensions of the proposed building setbacks for each floor on the layout/ section plan(s) for clarity.</p> <p>c. It is noted that the proposed green trail from G/F to 2/F is located within the proposed building setbacks of at least 3m and about 4.5m from the northern and eastern and western site boundaries respectively. With aid of section plan, please clarify whether the green trail is i) permeable and ii) publicly accessible.</p>	<p>Please refer to the <b>Attachment 1 – Extract of Revised Planning Statement (P.24, P.27 &amp; P.28), Attachment 2 – Revised Air Ventilation Assessment (Expert Evaluation) and Attachment 3 – Revised Visual Impact Assessment.</b></p> <p>Updated in Para. 5.11.2 of PS. The revised G/F plan is attached in the <b>Attachment 4 – Revised Development Scheme (G/F).</b></p> <p>The proposed building setbacks in the AVA is mentioned in the Para. 5.11.2 of PS. For clarification, the proposed 1.7m to 2.4m-wide landscaped setback area in the para. 4.2.6.1 of PS refers to a strip of government land to be included in the Application Site to form part of the existing public footpath in future.</p> <p>The green trail is permeable and would not be accessible by general public.</p>

<p>d. Please indicate the dimensions of the building recesses above 9/F at the southwestern corner.</p> <p>e. Please indicate the width of the proposed footbridge at 2/F (para. 4.2.5.1 of PS refers) and clarify whether it is enclosed and/or weather-proof.</p> <p>f. It seems that there is currently a ramp between Hong Kong Commercial Complex and the Site. The applicant may wish to incorporate any appropriate design measures along the building's façade, such as mural and lighting installation, to enhance connectivity.</p> <p>g. It is noted that there is a piece of vacant land sandwiched between the Site and Lung Tang Road. Please advise the status and the site context of the land.</p> <p>h. It is noted that the alignment of the existing footbridge ramp abutting Castle Peak Road is proposed to be modified (para. 4.2.7 of the PS refers). Please annotate the proposed alignment and height of the footbridge on relevant layout/section plan(s) for easy reference.</p> <p>i. Please explore possibility to incorporate further building setbacks, permeable elements and landscape treatments at pedestrian level to soften/ minimise the building bulk.</p> <p>j. It is noted that the proposed development complies with SBDG for the minimum site coverage of greenery (para. 5.12.2 of PS and para.</p>	<p>Dimension indicated in Appendix 3 of AVA-EE report.</p> <p>The width of the proposed footbridge is about 3.5m. It is fully enclosed.</p> <p>The ramp is the access road under Hong Kong Garden Commercial Complex.</p> <p>The vacant land is a private lot in TLTL 60RP and is covered with vegetation.</p> <p>The relevant information was shown in the Footbridge Design Checking Report attached in the Further Information (1) submission. Please refer to the <b>Attachment 5 – Extract of the Footbridge Design Checking Report</b>.</p> <p>Noted, would be further considered in future detail design stage.</p> <p>The requirements for building separation and building setback under SBDG would be compiled with in the detail design stage.</p>
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	<p>1.5.4 of AVA refer). Please clarify whether the requirements for building separation and building setback under SBDG would also be complied with.</p> <p>k. Please supplement whether MiC will be adopted for the proposed development.</p>	<p>It would be further considered in future detail design stage.</p>
2	<p><b><u>PS</u></b>          Para. 5.6.1 – Please indicate the BHs (in mPD) of the existing buildings in the surrounding instead of BHRs.</p>	<p>Updated in Para. 5.6.1.</p>
3	<p>Para. 5.6.3 –</p> <p>a. Please refer to our comments on VIA below and supplement the overall visual impact rating of “<b><u>Negligible to Moderately Adverse</u></b>” in this para..</p> <p>b. Please revise if the last sentence of this para. should be revised as “...It is anticipated that the increase in SC would not generate <b><u>significant</u></b> adverse visual impact to the surrounding.”.</p>	<p>Updated in Para. 5.6.3.</p> <p>Updated in Para. 5.6.3.</p>
4	<p>Para. 5.11.2 –</p> <p>a. Please supplement that the proposed development would inevitably result in more wind blockage than the baseline scheme with reduced building setbacks and larger building footprint.</p> <p>b. Referring to our comments (paras. 1b and c above), the applicant should review the location and permeability of the proposed building setbacks and revise this para. accordingly.</p>	<p>Updated in Para. 5.11.2.</p> <p>The proposed building setbacks in the AVA is mentioned in the Para. 5.11.2 of PS.</p>
5	<p><b><u>VIA</u></b>          Para. 1.4 – Please review if this para. should be revised as “...SC from</p>	<p>Updated in Para. 1.4.</p>

	17.5% to not more than 95% for the proposed RCHE(s)...”.	
6	Para. 3.2 – Please indicated the BH (in mPD) of the 3-storey commercial block to the immediate east for easy reference.	Updated in Para. 3.2.
7	Para. 4.3.1 – It is unclear why pedestrian and vehicles are considered as visual elements. Please consider deleting the following sentence “... <del>The pedestrians and vehicles using Castle Peak Road are also a part of the visual elements group are simultaneously the VSR population of the viewpoints...</del> ”.	Updated in Para. 4.3.1.
8	Para. 4.3.2 – Please indicate the BHs (in mPD) of the existing buildings in the surrounding instead of BHRs.	Updated in Para. 4.3.2.
9	Para. 6.1 – It is noted that the VIA compares the proposed development with the existing condition.	Noted.
10	VP1 Para. 6.2 to 6.7 – a. Please supplement that the sky view and mountain backdrop will be obstructed where appropriate.  b. Subsequently, please supplement whether the visual permeability and the depth of view would be largely retained.	Updated in Para. 6.2.  The visual permeability and depth of view will be generally be retained from VP1.
11	Para 6.2 – a. Please supplement the open sky view and mountain backdrop as visual elements at the background for this VP.  b. Please review if this para. should be revised as “...At the <b>middle ground</b> of VP1, ten residential towers...”.	Updated in Para. 6.2.  Updated in Para. 6.2.
12	Para. 6.3 to 6.5 – a. Please consider supplementing the rating for the effects of magnitude of visual change as “ <b>slight</b> ”.	Updated in Para. 6.3.

	<p>b. Please consider combining and revising these paras. as “As highlighted in table 2, VP1, <u>representing traveller and recreational users</u>, is considered a rare view., <del>as the overall usage of the pier is very limited especially during the daytime. The pier is not currently providing any ferry services and is rarely used for private boat boarding/alighting. Occasionally, people may use the pier as a recreational fishing point or resting point with the visual focal towards the ocean direction instead of the subject development, but otherwise, the pier is mostly unused. As such, the VSRs of VP1 are generally very few. Despite the slight blockages on the sky view and green backdrop, the proposed development with BH of about 60mPD would be visually compatible with other nearby residential developments with BHs ranging from about xx mPD and xx mPD and maintain the intended stepped height profile. Furthermore, as shown in Figure 3, the mountain backdrop of Tai Lam Country Park has already be largely disturbed by the existing Hong Kong Garden Developments. As such, the effects of the visual changes on the VSRs at VP1 will be slight.</del>”.</p>	<p>Updated in Para. 6.2.</p>
13	<p>Para. 6.5 – Please indicate the BHs (in mPD) of the existing buildings in the surrounding instead of BHRs.</p>	<p>Updated in Para. 6.3.</p>
14	<p>Para. 6.7 – As per our comments above, please consider revising this para. as “...with a <del>generally very few VSR</del> <u>low visual sensitivity</u>, the proposed development’s visual impact to VP is <u>Slightly Adverse</u>.”.</p>	<p>Updated in Para. 6.4.</p>
15	<p>VP2 Para. 6.8 – Please review if this para. should be revised as “...80 meters away from the Site <del>and is within the visual envelope</del>. It is...”.</p>	<p>Updated in Para. 6.5.</p>

16	<p>Para. 6.9 –</p> <p>a. Please supplement the road infrastructures along Castle Peak Road including the noise barrier, roadside vegetation etc in the foreground as visual elements.</p> <p>b. Please supplement the open sky view and mountain backdrop as visual elements in the background.</p> <p>c. Please review if this para. should be revised as “...right in front of the Site, <del>providing certain degree of visual blockage</del>. Additionally...”.</p>	<p>Updated in Para. 6.6.</p> <p>Updated in Para. 6.6.</p> <p>Updated in Para. 6.6.</p>
17	<p>Para. 6.10 –</p> <p>a. With reference to the photomontages comparing the proposed development and the existing condition, it seems that statements such as “create a visual relief”, “enhance visual openness”, “prevents the blockage of the sky view” could not be justified. Please review if the proposed design measures, including the proposed building setbacks and landscape treatments (please show on relevant photomontages if applicable), would soften the building mass instead.</p> <p>b. Please supplement that the open sky view and mountain backdrop will be obstructed and the visual permeability and depth of view would be reduced.</p>	<p>Updated in Para. 6.7. With a comparable building mass of the existing Block 22-24 Hong Kong Garden to the west (86mPD) and Block 18 Hong Kong Garden (117mPD) to the east, the proposed development will be visually consistent with the overall character of the area. Furthermore, the proposed landscape treatment on the 8/F, together with the existing layers of roadside vegetation, will help soften the intrusiveness of the building bulk.</p> <p>Updated in Para. 6.7.</p>
18	<p>Para. 6.11 – Please review if this para. should be revised as “Furthermore, <b><u>despite the visual blockages on the sky view and mountain backdrop and the reduction in visual openness</u></b>, as stated in the analysis of visual sensitivity, VP2 is a rather transient scene. The majority of VSR...do not linger at VP2. Therefore, <b><u>the effects of the visual changes on the VSRs at VP2 will be moderate</u></b>.”</p>	<p>Updated in Para. 6.8.</p>

19	<p>Para. 6.12 – As per our comments above, please consider revising this para as <b><u>“Considering a medium visual sensitivity and the reduction in visual openness, it will result in a Moderately Adverse visual impact in this VP. Improvements and a delicate façade design on form, colour, and greenery could be adopted in the later detailed design stage, with the aim of further softening the building mass of the proposed development and promoting compatibility with the existing building profile.”</u></b></p>	Updated in Para. 6.9.
20	<p>VP3 Table 2, VSR Population – Please consider discarding the follow para. <b><u>“As vehicle users are not included, the VSR for this viewpoint became very small.”</u></b></p>	Updated in Table 2.
21	<p>Para. 6.13 – Please review if this para. should be revised as “VP3 is a <b><u>medium-range</u></b> viewpoint located <del>outside of the visual envelope, on at</del> the pedestrian walk along the westbound lane of Castle Peak Road...<del>Despite the overall high traffic volume on Castle Peak Road, VP3’s viewing direction opposes incoming traffic. Consequently, The</del> VSR of VP3 would <del>not</del> mainly include <del>any vehicle users along Castle Peak Road. This leaves only</del> a small number of pedestrians and recreational joggers along Castle Peak Road <del>as the dominant VSR population.”</del></p>	Updated in Para. 6.10.
22	<p>Para. 6.14 – Please review if this para. should be revised as “...<del>The</del> <b><u>ridgeline extending from Tsuen Wan Green backdrop</u></b> can also be observed...” to tally with para. 6.15.</p>	Updated in Para. 6.11.
23	<p>Para. 6.15 – a. Please supplement the slight blockages on the sky view.</p>	Updated in Para. 6.12.

	b. Please review if this para. should be revised as “...will <b><u>not be visible.</u></b> <del>and, therefore, have a relatively low impact on the streetscape</del> <b><u>The depth of view will be generally be retained</u></b> from VP3.”	Updated in Para. 6.12.
24	Para. 6.16 – With reference to the photomontages comparing the proposed development and the existing condition, it seems that statements “improving the overall view of VP3” could not be justified. Please review if the proposed design measures, including the building disposition and landscape treatments, would soften the building mass instead.	Para. 6.16 is omitted.
25	Para. 6.17 – Please review if this para. should be supplemented as “...poses no change to the existing view of the <b><u>green backdrop</u></b> and waterfront view. The <b><u>green backdrop</u></b> has already been <b><u>partially</u></b> blocked...south-western side of the proposed development. <b><u>Therefore, the effects of the visual changes on the VSRs at VP2 will be negligible to slight.</u></b> ”	Updated in Para. 6.13.
26	Para. 6.18 – Please review if this para. should be revised as “ <b><u>Considering the low visual sensitivity of VP3 and slight blockage to the sky view, it will result in a Negligible to Slightly Adverse visual impact at this VP.</u></b> ”.	Updated in Para. 6.14.
27	<p>VP4</p> <p>Table 2 –</p> <p>a. Degree of visibility – Please review if this para. should be revised as “...the proposed development is too far way <b><u>to be clearly visible from this VP.</u></b>”.</p> <p>b. Duration/ Viewing Frequency to the proposed development – Please review if this para. should be revised as “ <del>However, it is hard to access especially for elderlies and families with younglings.</del></p>	<p>Updated in Table 2.</p> <p>Updated in Table 2.</p>



	<p><del>Such characteristic keeps the VSR relatively low and makes the scene <u>This VP is considered</u> occasional in general.”.</del></p> <p>c. Visual Sensitivity – Given this VP is recreational in nature, please review if this sensitivity of this VP should be <b>“Medium”</b>.</p>	Updated in Table 2.
28	<p>Para. 6.21 –</p> <p>a. Please review if this para. should be revised as <del>‘Although vegetation in park can sometimes cause partial obstruction,</del> The proposed development is visible...”.</p> <p>b. Please supplement the rating for effects of visual changes of <b>“negligible”</b> for this VP.</p>	<p>Updated in Para. 6.17.</p> <p>Updated in Para. 6.17.</p>
29	Table 2, Visual Sensitivity – Given this VP is recreational in nature, please review if this sensitivity of this VP should be <b>“Medium”</b> .	Updated in Table 2.
30	Para. 6.24 – Please supplement the rating for effects of magnitude of visual changes of <b>“negligible”</b> for this VP.	Updated in Para. 6.20.
31	<p><i>Conclusion</i></p> <p>Para. 7.2 – Please review if this para. should be revised as <del>“The visual impact of the proposed development on the surroundings has been minimized, by comparing it against the existing condition.</del> The proposed development has taken into account the effect...building height. <del>Such relaxation therefore posts no impact to the surrounding visuals.”.</del></p>	Updated in Para. 7.2.
32	Para. 7.3 – Please review if this para. should be revised as “... but also to a certain degree, <del>add visual interest and improve the public realm benefiting the general public</del> <u>help softening the building mass of the proposed development.</u> ”.	Updated in Para. 7.3.

33	<p>Para. 7.4 – Please review if this para. should be revised as “...key visual elements such as <u>the sky view</u>, coast line, <u>and mountain backdrop</u> will <u>in general</u> subject to <u>negligible to moderate changes</u>. <del>At the same time, the existing environmental and vegetation profile will also help harmonizing the visual impact brought by the proposed development.”</del></p>	Updated in Para. 7.4.
34	<p>Para. 7.5 – Please review if this para. should be revised as “...to the surroundings will be negligible <u>to moderately adverse</u>. <del>With regards to VP2, the visual impact is slightly adverse. Please note that the pedestrian viewers on the footbridge are more likely walking toward the promenade, which is physically and visually attractive than the residential development cluster on the hill side. The actual visual impact is considered NOT significant. It is also unlikely for pedestrian viewers to stay long on the footbridge to avoid direct traffic impact of the Castle Peak Road.</del>” as the visual impact rating for VP2 has already taken into account the visual sensitivity.</p>	Updated in Para. 7.5.
35	<p>Table 3 –</p> <p>a. Please supplement a column for the ratings of effects of magnitude of visual changes.</p> <p>b. Please revise this table as per our comments on visual impact ratings above.</p>	<p>Updated in Table 3.</p> <p>Updated in Table 3.</p>
36	<p>Photomontages – Please annotate all readily noticeable existing and/or planned developments with BHs (in mPD) as shown on the photomontages.</p>	The Photomontages are updated.
37	<p><u>Air Ventilation</u></p> <p>The potential air ventilation impact of the proposed footbridge at 2/F</p>	Discussion included and figures updated.

	connecting to Hong Kong Commercial Complex has neither been addressed nor illustrated in the figures. Please review.	
38	Para. 1.4.1 – Please review if this para. should be revised as “...Under the <b>Baseline Scheme</b> , there are building setbacks of about 15m/18m...”.	Noted and typo amended.
39	Sections 3.2, 3.3 and 4 – a. Referring to our comments (para. 1b above), please review the location and dimension of the proposed building setbacks and revise relevant discussion accordingly.  b. Subject to applicant’s clarifications (para. 1c above) on the permeability of the proposed green trail, please review the effectiveness of the proposed setbacks from the northern, eastern and western boundary for wind penetration.	In AVA, the following setbacks are indicated: setback of 3m from north, 4.5m from east/west, and 9m from south but at G/F to 2/F.  It is clarified that the green trail is permeable. The incoming prevailing wind would flow through the permeable green trail along the proposed building setbacks.
40	Please indicate the proposed permeable opening at G/F as discussed in relevant layout/ section plan(s) for easy reference.	Marked on Appendix 3 G/F plan.
41	<i>Specific Comments</i> Para. 1.4.1 – Please supplement the provision of 4m and 6m-wide building setbacks from the eastern and western site boundaries under the baseline scheme.	The setback of 4m and 6m is supplemented in Para. 1.4.1. and marked on Appendix 1 1/F plan.
42	Table 2.2 – Please consider supplementing Tsing Lung Tau Tsuen and L’Aqatique in this table.	Noted and included.
43	Para. 2.5.3 – Please review if the elevated walkway adjacent to Hong Kong Garden Commercial Complex across Castle Peak Road – Tsing Lung Tau should be included in this para..	Noted and included.
44	Section 2.3 and Figure 2b – Please review if the wind roses data of HKO station is updated.	Figure 2b is updated based on windrose data for 1998-2023. Please note that the result using data for 1998-2023 is generally the same as before.

45	Para. 3.2.1 – Please review if this para. should be revised as “...incorporates various good design features <b>to facilitate</b> air ventilation such as <b>building setbacks</b> from site boundary...”.	Noted and revised.
46	Para. 3.2.5 – Please review if this para. should be revised as “...and <b>the proposed building setbacks at pedestrian level would allow air flow is no less than the adjacent Hong Kong Garden Commercial Complex,</b> wind flow along wind corridors...”.	Please be clarified that this sentence would like to convey a message that the building setback from north and east side, though less than before, would not significantly impact air flow. It is suggested to rephrase as: “The Proposed Scheme allows fewer setback when compared with the Baseline Scheme ( <b>e.g. from northern and eastern boundaries</b> ). But, given the identified wind corridor <b>to the north</b> is already wide ....”
47	Para. 3.2.6 – Please supplement whether the building façade of the proposed development align with the Hong Kong Garden Commercial Complex which would allow air flow along Lung Tang Road.	It is revised as: “..., the northern façade of the proposed development is aligned about the same as the northern façade of the Hong Kong Garden Commercial Complex to the immediate east and would facilitate air flow along Lung Tang Road.”
48	Para. 3.2.10 and Figures 3 to 6 – Please annotate Block 15F and 14 on these figures for easy reference.	Noted and Fig 3 to 6 revised.
49	Para. 3.2.12 – Please review if this para. should be revised as “ <del><b>For the higher portion of the development, The</b> Proposed Scheme has vacated the southwest <b>corner</b> of the site <b>above 9/F which may facilitate southeasterly wind skimming over the proposed scheme and reached the downstream area. wind penetration whereas the Baseline Scheme provided setback from north/south boundary for wind penetration. The Proposed Scheme will facilitate more east to southeasterly wind penetration. The Baseline Scheme would allow more easterly to northeasterly wind penetration. East to southeasterly wind is generally prevailing under both annual and summer condition while east to northeasterly wind is more prevailing</b></del> ”	Noted and revised.

	<b><del>under annual condition.”</del></b>	
50	<p>Section 3.3 –</p> <p>a. Please consider adopting the following groupings of prevailing wind <u>with separate figures</u> for the directional analysis:</p> <ul style="list-style-type: none"> <li>● NNE and NE winds</li> <li>● ENE and E winds</li> <li>● ESE wind</li> <li>● SE, SSE and S winds</li> </ul> <p>b. It is noted that the discussion under this section focuses on the air ventilation impact of the baseline scheme instead of the proposed development. The applicant should supplement that the proposed development would result in more wind blockage than the baseline scheme with reduced building setbacks and larger building footprint under all wind conditions where appropriate.</p>	<p>Figures 3 to 6 are regrouped as per the comment to Fig 3 to 10.</p> <p>It is clarified that S3.3 is a directional analysis with comparison of relative performance of Baseline Scheme and Proposed Scheme, instead of focusing on Baseline Scheme only. Yet, wordings are refined.</p>
51	<p><i>NNE and NE Winds</i></p> <p>Para. 3.3.2 – Please review if this para. should be revised as “<del>...In addition, a noise semi-enclosure is built along Castle Peak Road – Tsing Lung Tau downwind of the Application Site. Wind availability along the same road (location under the semi-enclosure) has been significantly blocked by the noise semi-enclosure.</del> With the already limited NNE and NE wind flow to the Site <del>and existing noise semi-enclosure,</del> additional impact <del>due to the Proposed Scheme</del> for blocking... <del>For further west of Castle Peak Road – Tsing Lung Tau, the Proposed Scheme can allow wind penetration along southern side of Blocks 22 to 24 of the Hong Kong Garden to benefit the area. In addition, a noise semi-enclosure is built along Castle Peak Road – Tsing Lung Tau downwind of the Application Site. Wind availability along the same road (location under the semi-enclosure) has been</del></p>	<p>Noted and revised.</p>

	<b><u>significantly blocked by the noise semi-enclosure.”</u></b>	
52	<p><i>ENE and E Winds</i></p> <p>Para. 3.3.3 and 3.3.4 –</p> <p>a. Please refer to our comments (para. 50a above) and combine these para. accordingly.</p> <p>b. Please supplement whether the proposed building setbacks from the northern and southern site boundaries respectively and the open area to the immediate north of the Site would still allow air flow along Lung Tang Road and Castle Peak Road towards the downstream area especially areas at Blocks 22 to 24 of Hong Kong Garden.</p> <p>c. Please consider discarding the discussion <b><del>“Yet, it is noted that Hong Kong Garden Commercial Complex is to the immediate east of the Application Site. Even with building setback from northern boundary provided in both schemes, the pedestrian level will still be blocked by the Complex so that the benefit of setback cannot be fully realised.”</del></b></p> <p>d. It is unclear how the “vacate southwest portion” could facilitate the air flow of E wind with different alignment directions. Please consider discarding relevant discussion.</p>	<p>Noted and combined.</p> <p>Discussion included under S3.3.6</p> <p>Discussion rephrased.</p> <p>Discussion is removed.</p>
53	<p><i>ESE Winds</i></p> <p>Para. 3.3.5 –</p> <p>a. Please review if this para. should be revised as “... <b><del>similar to E wind condition, the proposed building recesses above 9/F</del></b> of the Proposed Scheme would allow portion of ESE wind to skim over and reach the downstream area.”</p>	<p>Noted and revised.</p>

	<p>b. Please supplement if the 9m building setback at G/F to 2/F from the southern site boundary would allow air flow and minimise the wind blockages induced by the proposed development.</p>	Supplemented under S3.3.7.
54	<p><i>SE, SSE and S Winds</i>  Paras. 3.3.7 to 3.3.12 –</p> <p>a. Please refer to our comments (para. 50a above) and combine these paras. accordingly.</p> <p>b. Apart from Lung Tang Road, please review if the wind availability at Vale Villa would also be reduced.</p> <p>c. Please supplement whether the open area to the immediate west of the Site would also allow air flow to the downstream area.</p>	<p>Noted and combined.</p> <p>Noted and included in discussion.</p> <p>Included in discussion in S3.3.13.</p>
55	<p>Para. 3.3.7 – Please review if this para. should be revised as “...The 6m setback <b>under the Baseline Scheme</b> from western boundary...”.</p>	Para revised.
56	<p>Para. 3.4.1 – Please refer to our comments (para. 50b above) and supplement that the proposed development would result in more wind blockage than the baseline scheme with reduced building setbacks and larger building footprints.</p>	Discussion included in S3.4.2.
57	<p>Para. 3.4.2 –</p> <p>a. Please specify the location of the proposed building setback for clarity.</p> <p>b. Please review if this para. should be revised as “to allow <b>air flow which can function better under southeasterly wind</b>”.</p>	<p>Noted and included.</p> <p>Revised.</p>
58	<p>Para. 3.4.3 – Please review if this para. should be revised as “...is retained to <del>enhance the air ventilation performance or</del> minimise...”.</p>	Noted and revised.

59	Para. 4.1.2 – Please supplement that the data from HKO has also been considered.	Noted and revised.
60	Para. 4.1.3 – Please refer to our comments (para. 50b above) and supplement that the proposed development would result in more wind blockage than the baseline scheme with reduced building setbacks and larger building footprint.	Noted and included.
61	<i>Figures</i> Please refer to our comments (para. 50a above) and provide separate figures for each groups of prevailing wind.	Noted and revised.
62	Figures 3 to 6 – Please review if the legend “Existing Breezeways” should be read as “ <b>Existing Air Paths</b> ”.	Noted. and revised.
63	Figures 3 and 4 – Please thicken the arrow of E and ENE wind penetrating through the 15m-wide building setback from the southern boundary of the baseline scheme.	Noted and revised.
64	Figures 5 and 6 – Please review if the statement under E and ESE wind should be revised as “Flow over building <b>above 9/F (37.95mPD)</b> and <b>reach the</b> downwind area”.	Noted and revised.
65	Please be advised that sunlight penetration is not under PlanD’s purview.	Noted.
66	Please be reminded to highlight the revision in the upcoming submission for easy reference.	Noted.



Departmental Comments		Responses
<b>2 October 2024 refers:</b> <b>Universal Accessibility Project Team of Highways Department:</b>		
1	Please note that the proposed lift under Contract No. HY/2020/23 is anticipated to be completed by end-2025. During the lift retrofitting works, various stage of temporary traffic arrangements (TTAs) will be implemented along the carriageway and adjacent footpath along Castle Peak Road – Tsing Lung Tau. The proposed car parking spaces and loading/unloading spaces as mentioned in paragraph 3 of the Traffic Impact Assessment will be likely in conflict with the TTA under the Contract. Therefore, close liaison with HyD’s Contractor is required when planning for its TTAs.	The modification work of footbridge NF437 and the construction of Proposed Development will commence after the completion of lift retrofitting works (Contract No. HY/2020/23) which is anticipated to be completed by end-2025.

Departmental Comments		Responses
<b>15 October 2024 refers:</b> <b>Fire Services Department:</b>		
1	Please be informed that I have no specific comment on the application. However, the following advisory clauses shall be delivered to the applicant:  "Detailed fire services requirements will be formulated upon receipt of formal submission of STT/STW, general building plans or referral of application via relevant licensing authority as appropriate. Furthermore, the EVA provision in the captioned work shall comply with the standard as stipulated in Section 6, Part D of the Code of Practice for Fire Safety in Buildings 2011, which is administered by the Buildings Department. In addition, height restriction as stipulated in relevant regulations governing the proposed social welfare facilities shall be	Noted.

observed. Licensing requirements will be formulated upon receipt of a formal application via the Licensing Authority."	
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Departmental Comments	Responses
<p><b>15 October 2024 refers:</b></p> <p><b>Buildings Department</b></p>	
<p>1 <u>Part A: General Comments</u></p> <p>It is noted that 1 structure is proposed in your application. Before any new building works (including containers/open sheds as temporary buildings, demolition and land filling, etc.) are to be carried out on application site, prior approval and consent of the Building Authority should be obtained, otherwise they are unauthorized building works (UBW) under the Buildings Ordinance (BO). An Authorized Person should be appointed as the co-ordinator for the proposed building works in accordance with the BO.</p>	Noted.
<p>2 <u>Part B: Advisory Comments for the Applicant</u></p> <p>The applicant's attention is drawn to the following points:</p> <p>i) the site shall be provided with means of obtaining access thereto from a street and emergency vehicular access in accordance with Regulations 5 and 41D of the Building (Planning) Regulations (B(P)R) respectively;</p> <p>ii) the site does not abut on a specified street of not less than 4.5m wide and its permitted development intensity shall be determined under Regulation 19(3) of the B(P)R at building plan submission stage;</p> <p>iii) for UBW erected on leased land, enforcement action may be taken</p>	<p>Noted.</p> <p>Noted.</p> <p>Noted.</p>

<p>by the Buildings Department to effect their removal in accordance with the prevailing enforcement policy against UBW as and when necessary. The granting of any planning approval should not be constructed as an acceptance of any existing building works or UBW on the application site under the BO;</p> <p>iv) any temporary shelters or converted containers for office, storage, washroom or other uses are considered as temporary buildings subject to the control of Part VII of the B(P)R;</p> <p>v) the proposed layout with excessive high headroom should be justified;</p> <p>vi) adequacy of the means of escape in case of fire or emergency, including the inter-relationship between staircases, under regulation 41(1) of the B(P)R should be provided; and</p> <p>vii) detailed checking under the BO will be carried out at building plan submission stage.</p>	<p>Noted.</p> <p>Noted.</p> <p>Noted.</p> <p>Noted.</p>
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Departmental Comments	Responses
<p><b>15 October 2024 refers:</b></p> <p><b>Lands Department:</b></p>	
<p>1 i) The proposed development would contravene the existing lease conditions. If planning approval is given by the Town Planning Board (TPB), the owner of the Lot is required to apply to Lands Department (LandsD) for a land exchange for the implementation of the proposed development. We must emphasize that the proposal will only be considered upon our receipt of the valid application from the owner of the Lot. We would also advise that there is no guarantee that the land exchange application, if received by LandsD, will be approved and this office reserves our comment on such. The land exchange application will be considered by LandsD acting in the capacity as the landlord at its sole discretion. In the event that the land exchange application is approved, it will be subject to such terms and conditions as the Government shall deem fit to do so, including, among others, the payment of premium and administrative fee.</p>	<p>Noted.</p>
<p>2 <u>Site Area</u></p> <p>ii) The site area in the application documents has not been checked by survey and subject to verification which will be addressed when handling the land exchange application.</p>	<p>Noted.</p>
<p>3 <u>Proposed Vehicular Access &amp; Proposed Road Works</u></p> <p>iii) While the lease governing the Lot has no prohibition against vehicular access, the Lot is however landlocked by unleased and unallocated G.L. and does not abut onto public road i.e. Castle Peak Road – Tsing Lung Tau. And it is to clarify that the proposed “setback area” of about 126m<sup>2</sup> to form part of the existing public footpath in future is currently situated on G.L. As the “setback area” remains as part</p>	<p>Noted.</p>

	of the regrant lot, the applicant should ensure that the maintenance and management responsibilities of the “setback area” for such public usage should not be passed onto the individual flat owners/RCHE users.	
4	iv) According to the application documents, the vehicular access for the proposed development is proposed to be located at the southeastern boundary of the application site facing Castle Peak Road – Tsing Lung Tau, which requires the realignment of the existing footbridge NF437 as stated in Para. 4.2.7 and shown on Figure 3.1 “G/F Layout Plan” of the Traffic Impact Assessment Report at Appendix 5 of the application documents. The applicant should also include the G.L. sandwiched between the application site and the existing public road (i.e. Castle Peak Road – Tsing Lung Tau) as part of their proposed road works for the purpose of public footpath. For road projects carried out by private applicant under Cap. 370, the private applicant should pay all the costs of the private works including the administrative costs as well as the related compensation and ex-gratia allowances if any.	Noted.
5	v) This office reserves our comment on the proposed schematic design which would only be examined in detail during the building plan submission stage upon completion of land exchange. There is no guarantee that the schematic design as presently proposed in the subject S.16 application if reflected in future building plan submission(s) will be acceptable under lease.	Noted.
6	<u>Proposed Social Welfare Facility (i.e. RCHE)</u> vi) Regarding the “Incentive Scheme to Encourage Provision of Residential Care Home for the Elderly Premises in New Private Development – Time-limited Enhancements” under Lands Administration Office Practice Notes No. 5/2023, the policy support of Social Welfare Department has to be sought.	Noted.

7	<p><u>Proposed Footbridge Connecting Hong Kong Garden Commercial Complex on 2/F of the Proposed RCHE</u></p> <p>vii) According to para. 4.2.5.1 of the Planning Statement (“PS”), it was said that the applicant (Loi Hing Investment Company Limited) is also the owner of the Hong Kong Garden Commercial Complex (“HKGCC”) erected at the Remaining Portion of Section A of Tsing Lung Tau Lot No. 60 (“TLTL 60 s.A RP”). However, record of the Land Registry reveals that the registered owner of HKGCC should be Tsing Lung Investment Company Limited, which should be clarified by the applicant. According to the application documents, a proposed footbridge will be provided on the 2/F of the proposed RCHE connecting to HKGCC (“proposed footbridge connection”) as stated in para. 4.2.5.1 of the PS and shown on the 2/F plan at Appendix 2 “Development Scheme” of the application documents. The proposed footbridge connection will straddle over TLTL 60 s.A RP and connect to the HKGCC which falls into multiple ownership together with other residential units under New Grant No. TW5712 dated 24.7.1953 as modified subsequently for private residential purposes and such other non-industrial purposes.</p>	<p>Noted, the feasibility of provision of footbridge connection from adjoining site to be further studied.</p>
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Departmental Comments	Responses
<p><b>15 October 2024 refers:</b>  <b>Planning Department:</b></p>	
<p>1 <u>Planning Statement</u>  Section 2.2.1 (i) – Please clarify what is the group of high-density residential developments along the coast (zoned “R(A)”) in Tsing Lung Tau.</p>	<p>It refers to the residential developments located further east along the coast from the site, including Sea Crest Villa Phase 1 and Lido Garden in Sham Tseng.</p>
<p>2 <u>VIA</u>  Section 3.2 – Please review and consider revising as “It is surrounded by the Hong Kong Garden development which comprises several medium-rise residential towers (zoned “R(B)1”) at the east, west and north of the Site...”.</p>	<p>Updated in Para 3.2. Please refer to the <b>Attachment 3 – Revised Visual Impact Assessment.</b></p>
<p>3 <u>AVA-EE</u>   Section 1.3.1 – According to the planning statement, the application site is currently vacant. Please clarify whether the site is currently vacant or “for open storage purpose without building structure”.</p>	<p>Please refer to the <b>Attachment 2 – Revised Air Ventilation Assessment (Expert Evaluation)</b></p> <p>S1.3.1 amended.</p>
<p>4 Section 1.3.2 – According to the planning statement, the site is surrounded by the Yale Villa – Hong Kong Garden to the north. Please clarify whether it should be “Vale Villa” or “Yale Villa” for consistency.</p>	<p>Typo in S1.3.2 amended.</p>
<p>5 Please check and ensure that all the major noise barriers, elevated structures, planned and committed development within the surrounding area have been taken into account in the AVA-EE appropriately.</p>	<p>All the major noise barriers, elevated structures, planned and committed development within the surrounding area have been taken into account in the AVA-EE. S1.3.4 &amp; S3.2.2 are revised.</p>

Departmental Comments	Responses
<p><b>1 November 2024 refers:</b>  <b>Social Welfare Department:</b></p>	
<p>1 <b><u>Item 9 - balconies connected with residents of single bed rooms</u></b>  As shown on the Revised Development Plan (Attachment 4), a number of single rooms and suite rooms are provided with balconies including 18 single rooms on 5/F, 36 single rooms on 6/F, 22 single rooms on 7/F and 6 suite rooms on 7/F. On paragraph 16.2.4 of the Code of Practice for Residential Care Homes (Elderly Persons) June 2024, it states that "Residents of RCHE should be provided with a safe and protected living environment.....; effective measures shall be implemented and notices be posted to prevent residents from colliding with large floor-to-ceiling glass and entering prohibited areas such as the server room, rooftop or balcony." To comply with such requirement, the applicant shall note that all balconies in RCHE are prohibited areas for residents.</p>	<p>Noted.</p>
<p>2 <b><u>Item 11 - C&amp;A home to accept cases of all care levels, from mild, moderate to severe grade of impairment</u></b>  As the proposed RCHE would be registered as a C&amp;A home, it will be "an establishment providing residential care, supervision and guidance for persons who have attained the age of 60 years and who are generally weak in health and are suffering from a functional disability to the extent that they require personal care and attention in the course of daily living activities but do not require a high degree of professional medical or nursing care" as stipulated in Paragraph 2.1.1 (b) of the Code of Practice for Residential Care Homes (Elderly Persons) June 2024. In this regard, the applicant is advised that the proposed RCHE shall accept cases matched with appropriate parameters of impairment and care need for a C&amp;A home.</p>	<p>Noted.</p>



Departmental Comments		Responses
<b>1 November 2024 refers:</b> <b>Transport Department</b>		
1	A meeting among TD, HyD and the applicant was held on 21 October 2024. The applicant agreed to review the feasibility of using wheelchair lift along the staircase as an alternative of temporary ramp for disabilities during the footbridge modification works. The applicant will submit the scheme to TD and HyD to review and will liaise with LandsD to incorporate the relevant clauses in the lease.	Noted. The further information was submitted to Lands Department on 4 November 2024, please refer to the email record in <b>Attachment 6 – Email Record</b> .
2	The existing traffic sign along Castle Peak Road – Tsing Lung Tau may affect the sightline for the motorist leaving the development. The applicant should ascertain adequate sightline and should propose modification works to maintain the sightline as appropriate.	In order to ensure the sufficient sightline for the vehicle leaving the Proposed Development, the advance direction sign is proposed to be shifted by some 30m eastward (towards Tsuen Wan). The advance direction sign relocation arrangement is shown in <b>Attachment 7 - Figure R2-1</b> .

Departmental Comments		Responses
<b>12 November 2024 refers:</b> <b>Environmental Protection Department:</b>		
1	<b><u>Comments on the SIA</u></b>  Section 2.2.3 & Section 2.4.1 Table 1 – Please revise “Kwan Chung” to “Kwai Chung”.	Please refer to the <b>Attachment 8 – Revised Sewerage Impact Assessment</b> .  Noted and typo revised
2	Section 2.4.1 Table 1 & Appendix 2 Table 1 – Please review the total flow rate (m3/day) of the proposed development.	Noted and revised.
3	Section 2.6.7 Table 3 & Appendix 2 Table 5 – According to Table T-5 of GESF, the relevant peaking factor under (b) Sewage Treatment Works, Preliminary Treatment Works and Pumping Stations should be adopted for Tsing Lung Tau Sewage Pumping Station (TLTSPS).	The peaking factor under (b) Sewage Treatment Works, Preliminary Treatment Works and Pumping Stations is adopted in the SIA.

4	Please re-visit the hydraulic assessment based on the comments above.	Noted and updated.
5	<p><b><u>Comments on the EA - Air Aspect</u></b></p> <p>Section 2.4.2: Please provide the peak hour traffic flows of the two access roads in the section to justify that these roads can be considered LDs and revise the last sentence since the two access roads surrounding the project site are not the internal roads of the proposed development.</p>	<p>Please refer to the <b>Attachment 9 – Revised Environmental Assessment</b>.</p> <p>According to the traffic forecast in Appendix 4.1, the access road bounding the site on northwestern, northern and eastern sides would have peak hourly flow of 200veh/hr to 550veh/hr. The flow is comparable to LD or lower classification. <b>S2.4.2</b> has been revised.</p>
6	Sections 2.6.3 and 2.6.4: Please provide the maximum number of mechanical equipment to be used simultaneously over the work site to demonstrate that their potential emissions will not be significant.	Since the area of the Application Site is small, the number of mechanical equipment operated simultaneously will be limited. It is estimated that the number of mechanical equipment operated simultaneously within the Application Site will be around 3 numbers only. <b>S2.6.3</b> has been revised.
7	<p><b><u>Comments on the Land Contamination Aspect</u></b></p> <p><b>Response to Comment (14) – Chapter 6</b></p> <p>Given the different nature and requirements of "Waste Management Implication" and "Land Contamination" aspects, the Consultant is advised to divide them into two standalone chapters. Please review and update as appropriate.</p>	Report updated.
8	<p><b>Response to Comment (16) – Para. 1.4.7</b></p> <p>The previous comment has yet to be duly addressed. While the approved EAR has been quoted multiple times, the Consultant shall supplement the relevant parts of the EAR and the email correspondence for report approval for reference and vetting.</p>	<b>App1.2</b> (extracts of previous EAR) and <b>App1.3</b> (approval record) are added to supplement.
9	<b>Response to Comment (20) – Para. 6.3.2</b>	

	<p>Please revise the first sentence as follows:  “These records revealed that the Site was occupied by building structure before <del>in</del> 1963 and the acid factory was demolished in about the late 1980s and became vacant in 1990.”</p>	Noted and revised.
10	<p><b>Response to Comment (26) – Para. 6.6.1</b></p> <p>Please revise “historic” to “<b>historical</b>” to avoid confusion.</p>	Noted and revised.
11	<p><b>Response to Comment (26) – Para. 6.6.3</b></p> <p>(a) Please revise “extract occupation period” to “<b>exact</b> occupation period” to avoid confusion.</p> <p>(b) Please revise “operation and routine operation procedures” to “<del>operation and</del> routine operation procedures” to avoid confusion.</p> <p>(c) Since the site is currently unoccupied and has no potential land contamination sources, please review whether it is crucial to conduct further site appraisal. Instead, please clarify whether "future site appraisal" shall be written as "future site investigation".</p> <p>(d) Discrepancies in the Application Number are spotted between Para. 6.6.3 (i.e. No. A/TW/122) and Email Correspondence (i.e., No. A/TW/129). Please carefully review and update as appropriate.</p> <p>(e) Please clarify why the proposed site investigation is only confined to soil sampling.</p>	<p>(a) Noted and revised.</p> <p>(b) Noted and revised.</p> <p>(c) Noted and revised.</p> <p>(d) It is clarified that the Application Number A/TW/122 refers to the previous approved planning application while Application No A/TW/129 refers to our current planning application.</p> <p>(e) Groundwater sampling should also be included in the proposed site investigation and <b>S6.6.3</b> revised.</p>

12	<p><b>Para. 6.7.1</b></p> <p>(a) Per the quantity estimation of C&amp;D materials in this Project, the Consultant shall review the relevance of DEVB TCW No. 9/2011 Enhanced Control Measures for Management of Public Fill. If it is deemed not applicable, the Consultant shall remove it accordingly to avoid confusion.</p> <p>(b) Please be advised that ETWB TC(W) No. 19/2005 is only applicable to public project. The Consultant shall carefully review and remove it as accordingly.</p>	<p>(a) Noted and deleted in <b>S7.1.1</b> (previously <b>S6.7.1</b>).</p> <p>(b) Noted and deleted in <b>S7.1.1</b> (previously <b>S6.7.1</b>).</p>
13	<p><b>Para. 6.7.6</b></p> <p>(a) Please supplement the anticipated excavation extent (i.e., area and depths) of the Project for further vetting of the quantity estimation.</p> <p>(b) Since surplus inert C&amp;D materials will be delivered to Public Fill Reception Facilities for beneficial reuse in other projects, please avoid using the terms "dispose" and "disposal" in this connection. Please thoroughly review and update the entire submission.</p>	<p>(a) Noted and supplemented in <b>S7.2.13</b> (previously <b>S6.7.6</b>).</p> <p>(b) Noted and revised if any.</p>
14	<p><b>Para. 6.7.7</b></p> <p>According to Waste Disposal (Chemical Waste) (General) Regulation (Cap.354), any person who produces or causes to produce chemical waste is required to register with EPD. Please specify that the Project Proponent or its contractor will duly follow the requirement and register with EPD as a chemical waste producer.</p>	<p>Noted and supplemented in <b>S7.2.16</b> (previously <b>S6.7.7</b>).</p>

15	<p><b>Para. 6.7.10</b></p> <p>Discrepancies in the quantity of chemical waste have been spotted between Para. 6.7.7 (i.e., not more than 50L per month) and Table 6.2 (i.e., around some hundred litres). Please clarify whether the figures in Table 6.2 cover the entire construction period.</p>	<p><b>Table 7.1</b> (previously <b>Table 6.2</b>) revised.</p>
16	<p><b>Para. 6.7.11</b></p> <p>Please be advised that it is inappropriate to adopt the disposal rates for domestic and C&amp;I waste for calculating the quantity of general refuse to be generated during the operational phase. The Consultant shall make use of their corresponding recycling rate in the calculation.</p>	<p>The calculation has been revised In <b>S7.2.20</b> (previously <b>S6.7.11</b>).</p>
17	<p><b>Para. 6.7.12</b></p> <p>Please review and incorporate relevant mitigation measures, including but not limited to (i) Good Site Practices; (ii) Waste Reduction Measures; (iii) Storage, Collection, and Transportation; (iv) Excavated C&amp;D Materials; (v) On-site Sorting of C&amp;D Materials; and (vi) Transportation of C&amp;D Materials, in both construction and operational phases, in accordance to relevant Ordinances, Regulations, Guidelines, and Technical Circulars on waste management.</p>	<p>Relevant mitigation measures have been included in <b>S7.2.3</b> to <b>S7.2.21</b>.</p>
18	<p><b>Para. 6.8.1</b></p> <p>According to Para. 6.3.2, the open storage area was adopted as construction material storage, please update the content to avoid confusion.</p>	<p>Noted and <b>S6.7.1</b> revised.</p>

19	<p><b>Para. 6.8.3</b></p> <p>(a) Please update the description of the open storage area in the first sentence to avoid confusion.</p> <p>(b) Please revise “further site appraisal” to “further site investigation”.</p> <p>(c) Please clarify whether groundwater sampling is required in the subsequent SI works.</p>	<p>(a) Noted and <b>S6.7</b> revised.</p> <p>(b) Noted and revised.</p> <p>(c) Groundwater sampling will also be included in the subsequent SI works</p>
20	<p><b>Para. 6.8.4</b></p> <p>Please be advised that this submission does not cover best management practices for waste management implications. The Consultant shall carefully review and update it as appropriate.</p>	<p>Best management practices have been added in <b>S7.2.3</b> to <b>S7.2.4</b>.</p>
21	<p><b>Section 7</b></p> <p>Please update the conclusion section as per the comments above.</p>	<p>Noted and updated.</p>