

Proposed Minor Relaxation of Plot Ratio Restriction for Permitted Flat and Proposed Shop and Services Uses at Lots 4614 and 4615 RP in D.D. 116, Lots 1753 S.B ss.3 (Part), 1753 S.B RP (Part), 1756 S.A (Part), 1756 RP (Part), 1757, 1758 RP and 1760 RP in D.D. 120, and Adjoining Government Land, Tai Kei Leng, Yuen Long, New Territories

Response to EPD's comments dated 27 November 2023 via email

Departmental Comments	The Applicant's Responses
EPD's comments dated 27 November 2023	
General Comments	
Please highlight the changes in the next submission for easy reference.	Noted.
Air Quality	
<p>a) Sections 1.1.4, 2.3.6 and 3.1.2:-</p> <p>i. Apart from the area near Tai Shu Ha Road East, it is noted that part of the project site near Tai Tong Road has to be reserved as non-building area for future road widening based on Figure 2.1. Please review and revise these sections as appropriate; and</p> <p>ii. You should <u>double check and confirm if there is really no available information</u> for the future alignments of the widened Tai Tong road and Tai Shu Ha road East at this stage since the buffer distance cannot be met for the proposed development if the two strips of land are used for road widening. Please consider to allow sufficient buffer distance from these two roads to be widened based on the boundary of the reserved land to the proposed development. Otherwise, please clarify whether the air quality impacts associated with the future widened Tai Shu Ha road East and Tai Tong road will be assessed under their study to ensure that adverse air quality impact on the nearby ASRs will not be anticipated;</p>	<p>Noted and updated report attached in Annex 1.</p> <p>i. The relevant sections have been revised to include the non-building area for future road widening of Tai Tong Road if there is a need in future.</p> <p>ii. Transport Department was consulted and confirmed (Annex 2) here is no program nor planning for any road widening works for both Tai Tong Road and Tai Shu Ha Road East. The non-building area is just as a reserved/contingency area for road widening if the Government consider there is a need in future. It would be a standard practice when new road works required, EIAO will be applied if applicable and mitigation at source is required.</p>
<p>b) Sections 2.2.4, 2.2.11, Table 2.1 and Figure 2.1:- Based on Figure 2.1, it is noted that there are some structures surrounding the project sites. Please review if there is any closer ASRs from the site boundary and supplement in Table 2.1, Section 2.2.11 and Figure 2.1;</p>	<p>Noted. The relevant sections, table and figure have been updated to include the temporary structures surrounding the project site</p>
<p>c) Section 2.2.5:-</p> <p>i. You should provide more information such as the construction site area, scale of the dusty activities including site formation and excavation areas, amount of excavated materials to be handled and no. of dump trucks and machinery on the site per time, etc. to justify that the dust impact would not be adverse with implementation of control measures; and</p> <p>ii. Please clarify whether there are any concurrent projects in the surrounding area and cumulative air quality impact shall be assessed;</p>	<p>i. The construction site area is ~ 2,540 m². The scale of dusty activities would not be huge since the site formation area is around ~ 928 m² (including both domestic building and retail block). Also, the excavation scale would not be huge since there are no basements in the proposed scheme.</p> <p>Usually, 2m depth ground soil would be excavated for pile cap construction. Therefore, the volume of excavated materials to be handled would be around (~ 928m² x 2m) 1,855m³. The period of excavation is anticipated to be around or less than 1 month. The number of dump trucks is anticipated to be around 10 trucks/ day (assuming each truck can carry 15 tones and there is around 18 working days in 1 month), based on the current available information of the proposed development. To further reduce the air quality impact from excavation and site formation, phasing of the excavation is suggested to avoid relatively large scale of excavation at the same period. Fugitive dust will be the only potential major source of air quality impact during the construction phase of the proposed development. It is anticipated that unacceptable impacts from the criteria pollutants – NO₂, SO₂, CO, etc. are unlikely to be significant.</p> <p>For the construction machinery operating on-site, the number of this is anticipated to be around 3. Under the Air Pollution Control (Non-road Mobile Machinery) (Emission) Regulation, only approved or exempted non-road mobile machineries (including mobile generator, air compressor, excavator, crawler crane, bulldozer, and etc.) with a proper label are allowed to be used in the construction site. The Contractor is also required to use mains electricity supply for construction equipment as far as practicable and to Ultra-low sulphur diesel (ULSD) for all diesel-operated plants and equipment on</p>

	<p>Site and place any diesel or petroleum fuelled equipment away from nearby sensitive receivers as practicable. Therefore, with the implementation of machinery regulation, the air quality impact due to operation of machinery is anticipated to be insignificant.</p> <p>ii. The R(A)6 site at the east of the subject site may be a concurrent project. The ASRs of the cumulative air quality from the concurrent construction are mainly residential buildings, such as Sereno Verde and Reach Summit. Also, an educational facility called Ling Man School is also identified as ASRs.</p> <p>With relatively short distance (around 25m) from the closet ASRs, mitigation measures are suggested to be implemented. For example, the project proponent/contractor shall liaise with relevant parties of the concurrent projects to avoid any heavy dusty activities to be conducted at the same time. Also, dust emission generated can be further minimized with the implementation of appropriate dust control measures and requirements listed in the Air Pollution Control (Construction Dust) Regulation of the APCO as well as good site practices. With the implementation of these mitigation measures/ control and relatively small construction area, adverse cumulative air quality impact is not anticipated.</p>
<p>d) Section 2.2.11 - Please revise “not less than 2.4m” as “>=3m” in the second bullet point;</p>	<p>Noted. Text has been amended accordingly.</p>
<p>e) Section 2.3.2:-</p> <p>i. Please specify clearly if any air/odour nuisance from the nearby areas (e.g. Tai Sang Feeds Co., Ltd, nearby nullah and workshops) is found at the site boundary of the proposed development during the site survey; and</p> <p>ii. You are reminded that it should be the responsibility of the applicant and their consultants to ensure the validity of the chimney data by your own site surveys. Should the information of industrial chimneys be subsequently found to be incorrect, the assessment result as presented in the application would be invalidated;</p>	<p>i. During the site visit, no air/odour nuisance from the nearby areas (e.g. Tai Sang Feeds Co., Ltd, nearby nullah and workshops) is found at the site boundary of the proposed development. The relevant information has been included in the revised section 2.3.2.</p> <p>ii. Noted.</p>
<p>f) Section 2.3.7:-</p> <p>i. Tai Tong Road is next to the project site and hence its vehicular emission impact on the proposed development shall be addressed. Please provide the road type of Tai Tong Road with source of reference or Transport Department's (TD) agreement and allow sufficient buffer distance from the road kerb of this road for any air-sensitive uses of the proposed development; and</p> <p>ii. It is noted from Figure 2.2 that 6.5m is the separation distance between the road kerb of Tai Shu Ha Road East and the residential tower of the proposed development. Please clarify and revise the section by confirming that there is no air-sensitive uses of the proposed development including openable window, fresh air intake and recreational use in the open space within the buffer zones from both Tai Shu Ha Road East and Tai Tong Road. Please also address that Tai Shu Ha Road East is considered as feeder road and hence a 5m buffer distance shall be allowed as LD;</p>	<p>i. Noted. 5m buffer distance has been allowed.</p> <p>ii. No air-sensitive uses of the proposed development subject to air quality problem as sufficient buffer distance allowed</p>
<p>g) Figure 2.1 - Please revise the separation distance of ASR05 in Figure 2.1 and Table 2.1 since the line shall be drawn from the closest site boundary of the proposed development; and</p>	<p>Noted and revised.</p>
<p>h) Figure 2.2:-</p> <p>i. Please show the buffer zones from Tai Shu Ha Road East and Tai Tong Road along the project site boundary (including the project site next to Tai Tong Road) to evaluate if sufficient buffers are allowed for any air-sensitive uses of the proposed development; and</p>	<p>i. Noted and updated.</p> <p>ii. Noted and updated.</p>

<p>ii. Please provide a remark to state that no air-sensitive uses including openable window, fresh air intake and recreational uses in open space shall be located within the buffer zone.</p>	
<p>Noise Impact</p>	
<p>a) It is noted that that the quoted traffic noise information was at Year 2014 at 4m height which clearly do not represent the noise situation of the proposal. The traffic forecast needs to address the traffic growth and the traffic generated by the proposed development. Thus, the predicted traffic noise level may be underestimated. Please confirm if the assumptions of traffic flow adopted for road traffic noise impact are representative in accordance with the recommendations stipulated under HKPSG. Otherwise, other justifications to illustrate and demonstrate that the proposed development would comply with the noise criteria of HKPSG;</p>	<p>Noted. A quantitative Traffic Noise Impact Assessment has been conducted and please refer to NIA report Annex 3.</p>
<p>i) S.3.2.2:-</p> <p>i. TD has published the latest ATC 2022 on the TD website. Please update; and</p> <p>ii. Please clarify the type of area of proposed development and the degree of the effect on the NSR of particular IFs. Please review and explicitly state in the report; and</p>	<p>i. Noted. The sentence has been deleted.</p> <p>ii. Noted. The sentence has been deleted.</p>
<p>b) S.3.3.1 - Please provide the drawings and photos to indicate the existing fixed noise sources within the 300m study area for completeness.</p>	<p>Noted. An industrial impact review section has been included in the NIA and please refer to Section 3.</p>