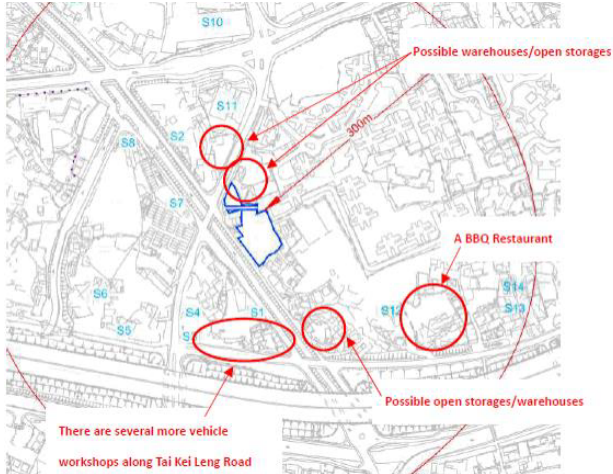


Proposed Minor Relaxation of Plot Ratio Restriction for Permitted Flat and Proposed Shop and Services Uses at Lots 4614 and 4615 RP in D.D. 116, Lots 1753 S.B ss.3 (Part), 1753 S.B RP (Part), 1756 S.A (Part), 1756 RP (Part), 1757, 1758 RP and 1760 RP in D.D. 120, and Adjoining Government Land, Tai Kei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

Response to EPD's comments dated 10 July 2024 via email

Departmental Comments	The Applicant's Responses
EPD's comments dated 10 July 2024	
Road Traffic Noise	
<p>a. S.2.3 and Appendix 2.1 (R-to-C Item b):</p> <p>(i) As TD has offered no comment on the methodology of the traffic forecast only, written confirmation from the respective competent party (e.g. traffic consultant) on (i) the strict adoption of the approved methodology for producing the traffic data and (ii) the Year 2043 traffic data is the maximum traffic projection within 15 years upon the occupation of the Proposed Development should be provided to substantiate the validity of the traffic data used. Please supplement;</p> <p>(ii) Notwithstanding, we have reservations about the reliability of the current traffic data. From our preliminary review, some rather large deviations in the predicted traffic flows (e.g. the traffic flows on Tai Shu Ha West Road) can be observed between the current submission and the environmental reviews conducted for other concurrent projects (e.g. Yuen Long South (YLS) Development) even taking into consideration of the difference in the assessment year. The Applicant/Consultant is recommended to revisit the</p>	<p>The TD and consultant confirmation letters in Appendix 2.1 of the revised NIA Report attached. Since the methodology is acceptable, transport authority has no comment.</p> <p>(i) Please be advised that the year 2043 peak hour traffic flows are produced with reference to the following: (a) year 2023 traffic flows obtained from traffic surveys conducted in the vicinity; (b) 2031 peak hour traffic flows from the BDTM; (c) the expected traffic growth from 2031 to 2043 estimated based on population growth ; (d) traffic generated by the planned / committed developments located in the vicinity, including Yuen Long South New Development Area; and (e) traffic generated by the Proposed Development.</p> <p>(ii) The forecasting methodology adopted to produce the traffic flows for the conduct of the NIA has been endorsed by Transport Department (Transport Department letter dated 27</p>

<p>traffic data and the forecasting methodology and to sort out the inconsistencies/discrepancies between the projects in the later NIA(s)</p>	<p>May 2024 in Appendix 2.1 of revised NIA report) and the traffic consultant has strictly adopted the same forecasting methodology to produce the traffic data used for the NIA. If necessary, the traffic forecast will be reviewed and updated in the detailed design stage.</p>
<p>b. S.2.4 – Continue liaison should be carried out with the concurrent projects (e.g. YLS Development). Any updates on the surrounding contexts due to the change in the development intensity, road scheme, provision of at-source mitigation measures, etc. should be duly considered and incorporated in the road traffic noise impact assessment in the later NIA(s) as appropriate and necessary</p>	<p>Above i(d) refers.</p>
<p>Fixed Noise</p>	
<p>c. S.3.2.3 – We have reservations about the ASR “C” assigned to the whole Proposed Development for the fixed noise impact assessment. From our desktop review, the lower to middle floors of the Proposed Development will very likely be protected by the existing vertical noise barriers on Yuen Long Highway and therefore should probably be considered as “not affected by any Influencing Factor (IF)”. Please review and revisit the proposed ASR in details for the Proposed Development in the later NIA(s);</p>	<p>The ASR rating at the level where the shielding effect cannot be provided by the noise barriers on Yuen Long Highway would be assigned for “C” while the rest within the shadow zone would be assigned for “B”. The S3.2.3 with revised Table 3.1 and section drawing in Appendix 3.3.of the updated NIA Report has been revised as follows: ‘...Therefore, the NSRs of the Proposed Development at the level where no shielding provided by the roadside noise barrier are assigned with an ASR of “C”; while the rest, i.e. located within the protection zone from the noise barrier, are assigned with an ASR of “B” ...’</p>

<p>d. Table 3.2 (RtC Item a) – More comprehensive review and site survey(s) are required in the later NIA(s) for the identification and verification of the nearby fixed noise sources and their potential impacts on the Proposed Development. For reference;</p>	
<p>(i) The current submission may have overlooked some possible industrial sources in the vicinity (see examples below) as well as the fixed noise sources (e.g. E&M equipment, ventilation system) from the nearby housing estates (E.g. Sereno Verde);</p> 	<p>(i) Common noise mitigation measures, if necessary, will be provided at the proposed development when detailed layout is available to the satisfactory of EPD, such that the future residents would not be subject to adverse fixed noise impact. As discussed with EPD, additional daytime and night-time site-surveys will be carried out at the detailed design stage and the relevant survey finding and photos will be included in the updated NIA which will be submitted to EPD for approval during the detailed implementation stage.</p>
<p>(ii) Simply drawing the conclusion of insignificant impact without any operation observed during the site surveys is inadequate, e.g. S14</p>	<p>Please refer to the response to comment (i) above.</p>
<p>(iii) Some of the identified fixed noise sources are comprised of open spaces, e.g. S2 and S4, so the conclusion made in S.3.5.1 that any noisy activities will be shielded by building structure may not be entirely correct and valid;</p>	<p>Please refer to the response to comment (i) above.</p>

<p>(iv) The operation hour of the identified fixed noise sources should be verified with site-survey and photos taken at night-time should be supplemented to justify and support the assessments.</p>	<p>Please refer to the response to comment (i) above.</p>
<p>e. S.3.4.3 – The Applicant/Consultant should ensure all the planned fixed noise sources associated with the Proposed Development (including but not limited to any ventilation systems, E&M equipment, any noisy activities associated with the shop & services to be provided) will be designed to comply with the HKPSG & NCO</p>	<p>According to the HKPSG, the requirement for fixed noise sources is either 5 dB(A) below the NCO or the prevailing background, whichever the lower. In section 3, it has been mentioned that all the planned fixed noise source associated with the Proposed Development will comply with the more stringent criteria, i.e. the NCO will therefore to be complied with.</p>
<p>f. S.3.4.3 – We have reservations about "the Proposed Development is not subject to adverse fixed noise impact" in S.3.5.1 based on only providing some descriptions of those sources without proper elaboration/assessment;</p>	<p>Please refer to the response to comment (i) above.</p>
<p>g. S.4.1.4 – We have reservations about "the nature of the Proposed Development is for residential use only", with reference to the MLP provided in Appendix 1.1;</p>	<p>The subject site is zoned Residential Group B and the current planning application is for the minor relaxation of Plot Ratio and Retails. The management of the fixed noise to the proposed development in the S4.1.4 is revised as bellows:</p> <p>"In addition, future fixed noise source, if any, of the proposed development will be designed to follow the recommendation in the HKPSG (acceptable noise level minus 5dB(A) mentioned in the Noise Control Ordinance or prevailing background</p>

	whichever is lower) to ensure that there will not be any adverse fixed noise impact arising from its operation.”
h. S.2.5.1 – “All residential dwellings with openable windows/doors of habitable room (noise sensitive use) for prescribed ventilation purposes have been assigned with assessment points.” This statement is obviously incorrect. Only representative NSRs have been selected for assessment in the current submission;	Noted. Text revised.
i. S.2.7.5 – “...which mentioned in the Practice <u>Note</u> would be adopted...”?	Noted. The sentence has been revised.
j. S.2.7.7 – “EPD's Practice Note on Application of EAB (BF) in Planning Residential Developments against Road Traffic Noise Impact”, please note that EPD did not issue such Practice Note and the consultant may like to make reference to the latest ProPECC PN 3/24 available in our website;	Noted. S.2.7.7 has been revised and made reference to the latest Practice Note.
k. S.2.7.9 – Please review and clarify where the “Fixed Glazing with/without Maintenance Window” will be applied in the Proposed Development. It has not been shown/incorporated in Figure 2.2/Appendix 2.3. Should that feature would be employed in the Proposed Development, for clarity and avoidance of doubt, please supplement: “Special locking device (e.g. removable handle or key lock, allen key) would be installed to the fixed glazing. The fixed glazing needs not be opened for ventilation and could be opened by the key for cleansing and maintenance purposes only. The above information should also be stated in the Deed of Mutual Covenant (DMC) and Sales Brochure to let the future occupants be well aware of its intended purpose, appropriate use and correct setting as appropriate”	Please noted for those window façades that are not necessary to serve ventilation purpose yet exposed to adverse road traffic noise, “Fixed Glazing with/without Maintenance Window” is proposed. Since there is no detailed design layout at this stage, it is assumed that the fixed glazing maybe located on the block where highlighted in red color (Please refer to Figure 2.2 . For S2.7.9 , the sentence has been revised.)

<p>l. S.2.8.1 - Appendix 2.3 – Only the PM results are shown in Appendix 2.3. The AM results are missing;</p>	<p>Noted. The mitigated scenario under for worse case (i.e. AM Peak adopted) has been updated in Appendix 2.3.</p>
<p>m. S.3.3.1 – For easy future reference, full details of site survey, including photos, plan, date, time, personnel, equipment, calibration, weather, field observations, etc., should be documented in the report;</p>	<p>Noted. As discussed with EPD, an updated NIA will be submitted in the detailed design stage to the satisfaction of EPD during implementation.</p>
<p>n. S.3.4.1 – This is not an EIA project. Reference should be made to the HKPSG instead of the EIAO-TM;</p>	<p>Noted. The sentence has been revised.</p>
<p>o. Various – Typo “Teun”, “Yeun”, “AW(BF)”, “EAB(BF)”</p>	<p>Noted. The typos have been revised.</p>
<p>p. Various – Confusing and unclear statement, such as “All impervious road surfacing is assumed as bitumen except Yeun Long Highway, which is a concrete road speed limit of 50 km/h and 70 km/h are assumed for different roads”; and</p>	<p>Noted. The sentence has been revised.</p>
<p>q. S.3.2.2 – Typo “Teun”</p>	<p>Noted. The typo in S3.2.2 has been revised.</p>