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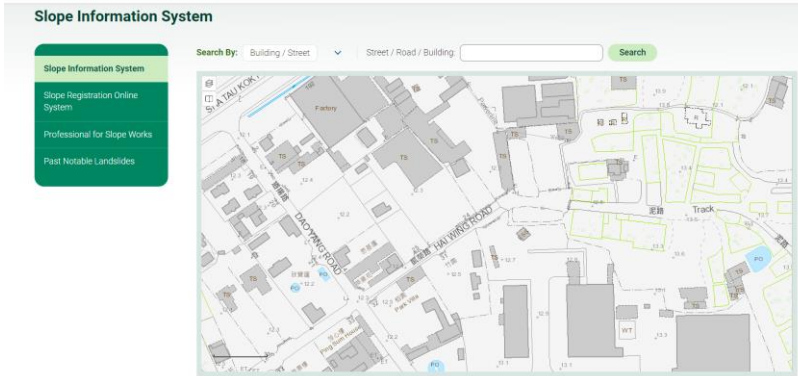
Table | 1  
Response-to-Comments

**Section 12A Planning Application No. Y/NE-LYT/16**

Request for Amendment to the Approved Lung Yeuk Tau and Kwan Tei South Outline Zoning Plan No.S/NE-LYT/19 from “Residential (Group C)” Zone and “Agriculture” Zone to “Residential (Group A)2” Zone at Various Lots in D.D. 83 and Adjoining Government Land in D.D. 83, Lung Yeuk Tau, New Territories

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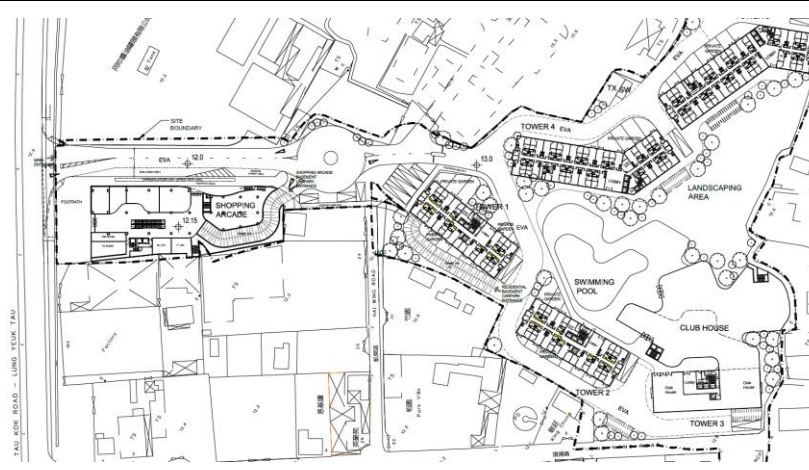
**Responses-to-Comments Table**

Date	Department	Comments	Responses
15.12.2023	Drainage Services Department	"We have no comment on the revised SIA.	Noted.
		<p>Please find our comments on the revised DIA as follows:</p> <p>(a) Appendix B: Please elaborate the change in average slope of Catchment A before and after the proposed development.</p>	<p>Before Development:</p>  <p>Before the proposed development, the highest ground elevation within the site area is 13.1mPD, the lowest is 12.2mPD.</p> <p>After Development:</p>

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			<p>The site is currently occupied by complex land use. The elevation will change after site clearance and site formation. After the proposed development, the highest elevation become 13.0mPD, and the lowest become 12.0mPD.</p>
		<p>(b) Figure 4-1: The proposed channel size is inconsistent with Para. 4.4.3 and Appendix C. Please review.</p>	<p>There is typo in the figure. The channel size has been revised to 1000mm to align with other sections and Appendix (Please refer to <b>Enclosure 2</b>).</p>
		<p>(c) Figure 4-1: It is noted that an existing section of U channel (feature no. SUP1001473) falls within the proposed development boundary. Please advise if it will be impacted under the proposed development.</p>	<p>It will not be impacted. Actually, perimeter drains will be provided for the proposed development, and it will directly convey the runoff into SUP1001474 without passing through the upstream SUP1001473.</p>
		<p>(d) Please advise details of the proposed 1000mm U-channel at government land.</p>	<p>The detailed feasibility of the proposed channel in under study by the project team. However, further upgrading of SUP1001474 will not have adverse impact on footpath and the surrounding. As suggested</p>

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			by the project team, detailed information of the proposed upgraded U-channel in terms of thickness, reinforcement, grating will be fully provided in the detailed design stage and submitted to DSD.
		(e) As mentioned in SIA, the treated effluent from the on-site STP is proposed to be discharged into the stormwater drainage system. Please advise if the proposed discharged is considered in the DIA. "	<p>As mentioned in Section 4.4.4, the treated effluent from STP has been considered (Please refer to <b>Enclosure 2</b>).</p> <p>As shown in Note 1 of Appendix C, the peak flow of 0.17m<sup>3</sup>/s has been considered in the hydraulic check of the channel. Within the SIA, the average daily dry weather flow of proposed development is calculated to be 3,005.4m<sup>3</sup>/day. Multiplying this value with the peaking factor of 4, the peak flow will be 0.139m<sup>3</sup>/s which is smaller than the value adopted in DIA hydraulic check (Please refer to <b>Enclosure 2</b>).</p>

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15.12.2023	Lands Department	<p>"Previous comments are still valid, and please also advised further comments from land administration point of view as follows:</p> <p>It is noted that the designs (including but not limited to the alignment and width) and the implementation conditions (e.g. free and uninterrupted at all times) of the proposed pedestrian footpath for access to and from Lot 782 RP in D.D. 83 and the proposed public pedestrian access connecting Hai Wing Road are not delineated on the Master Plan. Please note that no right-of-way reserved for Lot 782 RP in D.D. 83/ the adjoining lots and no such requirements would be imposed under lease in land exchange.</p> <p>Development rights of the adjoining lots would be deprived as no vehicular but only pedestrian access is proposed by the applicant."</p>	<p>As presented in <b>Illustration 4</b>, a pedestrian footpath with maximum width of 1.6m is proposed within the application site. The proposed footpath would allow existing access to and from Lot 782 RP in D.D.83, and the proposed footpath would be free and uninterrupted at all times.</p> <p>As presented in <b>Illustration 4</b>, the proposed pedestrian footpath connecting Hai Wing Road is illustrated, which would be free and uninterrupted at all times. Illustration presents the conceptual scheme for the proposed public pedestrian access, it would be delineated in the master plan, upon receiving no adverse comment regarding the revised layout from other government department.</p> <p>Noted. Currently, there is no established vehicular access from Hai Wing Road to the adjoining lots. In order to cater for the proposed development of the subject site, and to minimize unnecessary impacts to the existing land uses in the neighborhood, In view of the above, it is considered that status quo is appropriate in this case.</p>

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8.1.2024	Antiquities Monument Office	1) It is noted that the Planning Statement is not included in Enclosure 1. AMO is, therefore, unable to check the updates. Please make sure that all the accepted responses are reflected in the Planning Statement and followed up as appropriate.	Noted (Please refer to <b>Appendix 1</b> ).
		2) Please follow up the following and submit the revised Planning Statement for AMO’s review: R-to-C no. (2) i. Section 5.11 is not included in Enclosure.	Noted (Please refer to <b>Appendix 1</b> ).
		R-to-C no. (4) ii. According to Illustration 7 provided by the applicant, the application site seems to be situated at some distance from the previous archaeological assessment areas. Please review the approximate distance in between, hence confirm accuracy and relevancy, review and revise the statement “Given the application site is located at the fringe of the previous assessment areas, it is believed that the findings from the study are also applicable to the current application and the proposed development is considered unlikely to have significant impact on the SAI.” as appropriate.	The application site is situated about 250m from the previous archaeological assessment areas. The statement has been revised. In addition, according to the CEDD’s Preliminary Study on Developing the New Territories North (NTN) conducted in 2016, two boreholes were drilled during the Existing Ground Investigation, approximately 130m away from the application site (Please refer to <b>Illustration 7</b> ). No significant findings are reported, and therefore further actions are not deemed necessary. Considering the previous assessments conducted in close proximity to the application site, the risk of causing negative impacts to the SAI is considered very low.
		R-to-C no. (6) iii. The Planning Statement and a full set of illustrations are not included in Enclosure 1, AMO is, therefore, unable to check the said deleted Section 5.11.4 and Illustration 6-III.	Noted (Please refer to <b>Appendix 1</b> ).

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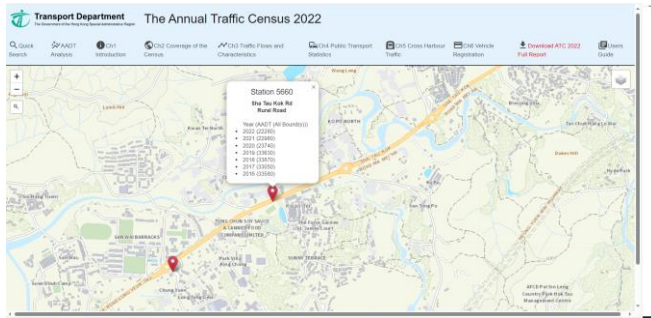
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Date	Department	Comments	Responses
29.12.2023	Environmental Protection Department	1. Please highlight the changes in next submission for ease of checking.	Noted (Please refer to <b>Enclosure 3</b> ).
		<p><b>Environmental Assessment Report</b> <u>Air Quality Perspective</u></p> <p>2. Table 2-4 Please check the annual NO2 for year 2022.</p>	<p>Please refer to <b>Enclosure 3</b> for the revised Environmental Assessment Report.</p> <p>Revised to 31 microgram/cubic meter.</p>
		<p>3. Table 2-5 The 4th highest 10-min SO2 for grid (38,54) is 59 while that for grid (39,54) is 55. Please amend.</p>	Revised as per the information provided.
		<p>4. Section 2.4.1 and Figure 2-1 Please show the 500m assessment area of the proposed development in Figure 2-1. Please check whether there are ASRs in the southern and northern side of the proposed development. Please make sure the ASRs are represented by the nearest points to the Project boundary.</p>	<p>The 500m assessment area are shown in Figure 2.2 of the updated report. In fact, the identified ASRs are the closest ones with no adverse air impact. Other ASRs relatively far away (but within 500m meter) could therefore considered as not adverse air impact. Therefore, the closest ASRs are focused on.</p>
		<p>5. Section 2.4.2 Please provide more information for assessing the potential constructional air quality impact arising from the proposed development, including but not limited to: the size of the demolition, site formation or/and excavation area, amount of excavated materials to be handled, number of dump trucks and mechanical equipment to be used per time over the work site. Please confirm whether there are any concurrent projects in the</p>	<p>Fugitive dust is the major air issue over those construction activities. However, no adverse is expected since suitable mitigation measures for dust control and material cover have been proposed in Section 2.4.5.</p> <p>On the other hand, in terms of cumulative air impact form concurrent projects, it is assumed that similar mitigation measures for dust</p>

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		<p>surrounding area and if positive, their cumulative air quality impact shall be addressed.</p>	<p>control should be adopted to minimize the air impact. So that, no adverse impact is expected.</p>
		<p>6. Section 2.4.4</p> <p>In view of the proximity of some ASRs to the Project boundary (&lt;10m), please consider the following enhanced dust mitigation measures:</p> <ul style="list-style-type: none"> <li>• Adopt site hoarding at sufficient height close to those concerned ASRs;</li> <li>• Locate the haul road away from those concerned ASRs;</li> <li>• Avoid dusty works or placing stockpiles near to those concerned ASRs;</li> <li>• Minimization of unpaved, exposed earth by immediate covering/ permanent paving as soon as the works have been completed.</li> </ul>	<p>The suggested mitigation measures have been added to the report.</p>
		<p>7. While we agree with the adoption of 20m buffer distance for conservative assessment, please provide the source of reference for the “planned upgrade of Sha Tau Kok Road” and its classification as “Primary Distributor”. Please clarify whether the upgrade and the classification of Sha Tau Kok Road is confirmed by the relevant authority or this is only the conservative assumption for this AQIA.</p>	<p>The planned upgrade of Sha Tau Kok Road was proposed by a legislative council member. Corresponding news report can be found at <a href="#">發展沙頭角成新旅遊中心 劉國勳倡設鐵路站及擴建公路作配套</a>.</p> 



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			<p>Sha Tau Kok Road is explicitly classified as Rural Road by Transport Department. HKPSG does not cover the buffering distance requirement for Rural Road. The 20m buffering distance of Primary Distributor is adopted as a conservative approach in view of the potential air pollution from the heavy traffic flow.</p> <p>The corresponding sections has been revised and the description about “Primary Distributor” has been removed to prevent confusion.</p>
		<p>8. Section 2.4.16</p> <p>Please provide the capacity of the STP and estimate its odour impact to the ASRs by making reference to the approved EIA reports/ DIR submissions for STP with similar capacity. Also, the odour removal efficiency at the exhaust vent of the deodourizing units should be at least 99.5%. Quantitative odour modelling may be necessary to demonstrate that no adverse odour impact from the proposed development if no suitable reference could be found. Please mark the proposed location of STP and the exhaust of its deodourizing units on a figure.</p>	<p>At this preliminary stage of the present application, the proposed STP is a membrane bioreactor plant. The preliminary treatment process and anticipated odour mitigation measures have been provided in the revised report. However, detailed information in terms of STP data setting, detailed processes, odour emission rate and impact on the ASRs will be determined and provided at detailed design stage where full set of the project information will be provided by the project team for EPD and DSD further review. Nonetheless, the proposed anticipated mitigation measures highlighted in Section 2.4.21-2.4.27 could help reduce the odour emission by 99.5% as required in Hong Kong.</p> <p>The preliminary sketch of the proposed STP will be provided in the revised SIA report.</p>
		<p>9. Figure 2-2</p> <p>Please clarify why Hai Wing Road on the eastern side of the proposed development is not considered.</p>	<p>The eastern part of Hai Wing Road will be intercepted by the construction activities. There will not be any traffic flow in that condition. Therefore, it will not be considered.</p>

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		<p><u>Water Quality Perspective</u></p> <p>10. Sections 4.2.3 and 4.4 ProPECC PN 1/94 has been superseded by ProPECC PN 2/23. Please review and update the relevant content.</p>	<p>Revised to ProPECC PN2/23.</p>
		<p>11. Sections 4.2.4 and 4.4 ProPECC PN 5/93 has been superseded by ProPECC PN 1/23. Please review and update the relevant content.</p>	<p>Revised to ProPECC PN1/23.</p>
		<p>12. Section 4.3.8 It is noted that sewage generated from proposed development will undergo proper treatment before discharge to Ng Tung River, also it is noted from Section 3.2.3 of SIA that tertiary treatment sewage treatment plant (STP) with design capacity of ~7,000 m<sup>3</sup>/day (maximum capacity 14,000 m<sup>3</sup>/day) is proposed. Please elaborate details of the STP, e.g. treatment level, disposal pathway, emergency bypass for emergency discharge of effluent at Section 4.3.8.</p>	<p>By considering the preliminary design information of the proposed development, the capacity of the STP has been revised to 5,000 m<sup>3</sup>/day. In term of discharge pathway, the outfall of the treatment plant (treated water) should be connected to the existing drainage system at Sha Tau Kok Road Lung Yuek Tau for discharge.</p> <p>In terms of emergency bypass for emergency discharge, part of the sewage might be pumped out for disposal through sewage truck, and the remaining quantity could be discharged through the manhole FMH1003633 at Sha Tau Kok Road Lung Yuek Tau to prevent overflow during the discharge. However, detailed information on the emergency plan, bypass discharge quantity percentage, efficient handling management system with detailed procedures will be provided at detailed design stage for EPD and DSD review.</p> <p>The emergency mitigation will be provided in the revised SIA report.</p>

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		<p>13. Section 4.4 Please incorporate preventive/mitigation measures regarding emergency discharge/potential sewage overflow at STP.</p>	<p>In terms of preventative measure for emergency discharge, the project team will ensure no overflow during the bypass discharge to manhole FMH1003633. Another important mitigation is the provision of underground sewers and terminal manhole with connection to FMH1003633 to anticipate the emergency discharge situation. However, detailed information on the proposed underground sewer and terminal manhole will be provided at the detailed design stage for EPD and DSD review before implementation. The short-term bypass and disposal may not have any adverse odour impact.</p>
		<p>14. Section 4.4 Please be reminded that no adverse water quality impact to nearby watercourses should be resulted during construction and operation of the proposed development.</p>	<p>The last sentence of conclusion section 4.5 has been modified to emphasize that no adverse water quality impact is anticipated to nearby watercourses.</p>
		<p><u>Waste Management and Land Contamination Perspective</u></p> <p>15. Quite a number of comments have not been duly addressed, and the overall quality of the submissions (i.e., revised EA Report and R-to-C) is unsatisfactory. The Consultant is required to clarify further and address all technical errors and inconsistencies to avoid confusion and misinterpretation. The Consultant is also advised to review the entire waste management implications and land contamination chapters carefully and respond to every comment (including the subparts instead of selective response) comprehensively.</p>	<p>Noted with thanks.</p>

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		<p>16. Response-to-Comment (39) – Section 5.1.1</p> <p>Referring to the response to the previous comment (39), the “Code of Practices and Guidelines for Asbestos Control and Handling” is considered irrelevant to this Study. Please carefully review and update Section 5.1.1 as appropriate.</p>	<p>In the previous revision of this report, it is suspected that asbestos material may be present on site because corrugated asbestos cement sheets was commonly used in temporary structure in the past, especially the roof.</p> <p>After reviewing the aerial photos, no solid evidence of the presence of asbestos on site area is found. All the section about asbestos within this report will be removed to prevent confusion. Nonetheless, further investigation should be provided by the project team with the qualified asbestos specialists to see whether evidence could be found out at the detailed design stage.</p>
		<p>17. Response-to-Comment (16) – Section 5.3.3</p> <p>The previous comments have not been duly addressed. In addition to building demolition and site formation works, the Consultant shall clarify whether site clearance and excavation works shall be considered major sources of C&amp;D materials.</p>	<p>Within the proposed development, the site clearance work is almost equivalent to the demolition of existing buildings. And site formation usually involves excavation and backfilling to form temporary assess and building platform for the later structure construction works. The wording in that section has been modified to suit EPD concern.</p>
		<p>18. Response-to-Comment (17) – Section 5.3.4</p> <p>(a) Please append the USEPA’s Characterization of Building-Related Construction and Demolition Debris in the United States for clarity.</p> <p>(b) Please confirm with the Project Engineer whether the proposed GFA-based estimation method dated Year 1998 from the USEPA is valid in estimating the quantity of demolition waste in this Project.</p>	<p>It is agreed that using generation index from US is less accurate for project in Hong Kong. Therefore, demolition waste index developed from other cities in southern China, like Shanghai and Shenzhen, is applied in the updated report, instead of the demolition waste index from USEPA.</p> <p>All other section has been updated accordingly after updated of waste index.</p>

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		<p>(c) Please clarify the meaning of demolition generation rates.</p> <p>(d) If the estimation method is proven valid and reasonable, please clarify whether the nature of demolition waste shall be considered inert or non-inert.</p> <p>(e) Inconsistency in the volume estimation of demolition waste is spotted between Section 5.3.4 and Table 5-3, the former suggests that the volume estimation would be subject to further investigation on the existing building, and the latter presents the estimated volume of inert C&amp;D materials. Please elaborate on the conversion from mass to volume for clarity.</p>	<p>(e): further elaboration on the captioned sections and table has been provided in the revised report.</p>
		<p>19. Response-to-Comment (18) – Table 5-1</p> <p>(a) The response stated that the requested information (i.e., site area, floor height, and number of floors) was not available at this stage of the Study. Given that the topographical maps do not consist of enough information for the estimation of GFA, please carefully review the accuracy of the estimation and elaborate on the assumption adopted for further review and vetting.</p> <p>(b) According to Section 6.3.2, consent for access to the entire site has been granted by all landlords within the Project Site. The Consultant shall conduct a site inspection to verify the assumption and site condition.</p>	<p>The consent from landlords is for the rezoning application, not for access of inspection.</p> <p>However, we obtained the cover area of each structure at site from the topographic map, then reasonably estimated the floor area based on the floor numbers.</p> <p>More precise information and more accurate estimation will be provided for EPD review once building survey is done at the detailed design stage.</p>
		<p>20. Section 5.3.5</p> <p>(a) Please revise “paving waste” as “waste generated from the</p>	<p>(a) Noted and revised.</p>

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		<p>removal of paving slabs” to avoid confusion.</p> <p>(b) Please note that the redevelopment sites consist of the land of various lots with an area of 22,445m<sup>2</sup> in D.D. 83, and the adjoining government land with an area of about 1,358m<sup>2</sup>. 95% of the Site Area shall be 22,613m<sup>2</sup> [(22,445m<sup>2</sup> + 1,358m<sup>2</sup>) x 95%], please review and update the calculation as appropriate.</p>	<p>(b) Actually, based on the application form NO.12A, the proposed development area of 22,445m<sup>2</sup> site area has already included the 1,358m<sup>2</sup> government land. So, the calculation of removal of paving slabs is correct.</p> <div style="border: 1px solid black; padding: 5px; margin-bottom: 10px;"> <table style="width: 100%; border-collapse: collapse;"> <tr> <td style="width: 60%; border: none;">(c) Site Area 申請地點面積</td> <td style="border: none; text-align: center;">22,445</td> <td style="border: none;">sq.m 平方米</td> <td style="border: none; text-align: right;"><input checked="" type="checkbox"/> About 約</td> </tr> </table> </div> <p style="text-align: center; margin: 0;">2      <b>Parts 1, 2 and 3 第 1、第 2 及第 3 部分</b></p> <hr style="border: 0.5px solid black;"/> <p style="text-align: right; margin: 0;"><small>Form No. S12A 表格第 S12A 號</small></p> <div style="border: 1px solid black; padding: 5px;"> <table style="width: 100%; border-collapse: collapse;"> <tr> <td style="width: 60%; border: none;">(d) Area of Government land included (if any) 所包括的政府土地面積 (倘有)</td> <td style="border: none; text-align: center;">1,358</td> <td style="border: none;">sq.m 平方米</td> <td style="border: none; text-align: right;"><input checked="" type="checkbox"/> About 約</td> </tr> </table> </div>	(c) Site Area 申請地點面積	22,445	sq.m 平方米	<input checked="" type="checkbox"/> About 約	(d) Area of Government land included (if any) 所包括的政府土地面積 (倘有)	1,358	sq.m 平方米	<input checked="" type="checkbox"/> About 約
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		<p>21. Response-to-Comment (20) - Section 5.3.6 Please graphically indicate the location of the areas which require deep excavation as a figure or appendix of the EA Report submission.</p>	<p>The basement plan has been added to the report as Figure 5-2.</p>								
		<p>22. Sections 5.3.7 and 5.3.8 Please clarify the meaning of building waste and consider revising it as waste generated from superstructure works to avoid confusion.</p>	<p>The wording “building waste” has been replaced by “waste from superstructure”</p>								
		<p>23. Sections 5.3.9 to 5.3.11</p> <p>(a) Given that the proposed development comprises residential and non-domestic portions, the Consultant is advised to review whether the “waste index” for private housing projects is representative of the estimation of the quantity of C&amp;D materials generated from superstructure works for the entire project.</p> <p>(b) The Consultant shall review whether Table 3.3 of Appendix</p>	<p>(a) It is noticed that the referencing book <i>A Guide for Managing and Minimizing Building and Demolition Waste</i> was published in 2003. The waste index was developed from statistic back to 1990s, which was likely outdated.</p> <p>The updated report has made reference to <i>Report on Strategy for Management and Reduction of Construction and Demolition Waste</i></p>								

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		<p>F could be adopted to proportion inert and non-inert C&amp;D materials. If affirmative, the Consultant shall provide reasonable justification as supporting information.</p>	<p><i>in Hong Kong</i> published by Construction Industry Council in 2017 to provide a more accurate estimation.</p> <p>(b)The waste estimation is not referred to the Table 3.3 which has been removed from the revised report. Waste index reference from Report on Strategy for Management and Reduction of Construction and Demolition Waste in Hong Kong has been applied in the revised report.</p>
		<p>24. Response-to-Comment (21) -Appendix F</p> <p>(a) The previous comment has not been duly addressed. According to page 4 of Appendix F, the generation rate of construction waste is in the range of 0.125 m<sup>3</sup> /m<sup>2</sup> to 0.175m<sup>3</sup> /m<sup>2</sup> . Nevertheless, among the three building categories, the smallest waste index equals to 0.175m<sup>3</sup> /m<sup>2</sup> , please clarify whether there are other waste indexes available from the reference source that could more representatively define the generation rate for non-domestic uses and sewage treatment plant as stated in Section 1.3.</p> <p>(b) Please clarify which land use does the generation rate of 0.125 m<sup>3</sup> /m<sup>2</sup> refers to.</p>	<p>(a) As separated domestic and non-domestic use waste index in Hong Kong could not be found, therefore, available waste index from Report on Strategy for Management and Reduction of Construction and Demolition Waste in Hong Kong is applied in the revised report.</p> <p>(b)Our waste calculation was not referred to the generation rate of 0.125m<sup>3</sup>/m<sup>2</sup> which was extracted from A Guide for Managing and Minimizing Building and Demolition Waste (C.S. Poon, 2001). This reference has been removed from the revised report.</p>
		<p>25. Response-to-Comment (22) - Section 5.3.10</p> <p>(a) The previous comment has not been duly addressed. The Consultant shall note that (i) some of the construction activities would generate more inert C&amp;D materials / non-inert C&amp;D</p>	<p>(a)Making reference to Report on Strategy for Management and Reduction of Construction and Demolition Waste in Hong Kong (CIC, 2017), the inert/non-inert ratio adopted for calculation will be taken as 52.9 : 47.1 in the updated report.</p>

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		<p>materials, and (ii) some inert C&amp;D materials were reused in the same development project or disposed of at sorting facilities (excluded in the preparation of waste statistics). The current assumption, with 93% of construction wastes regarded as inert in nature, is inaccurate, of which the misinterpretation of information from the reference material may lead to significant errors in the estimation. The Consultant is advised to review the estimation approach carefully.</p> <p>(b) The current estimation approach, without considering the nature of development, construction activities and site-specific conditions, could not accurately reflect the project requirement and proportion of inert C&amp;D materials. The Consultant is advised to review and update the estimation rationale as appropriate.</p> <p>(c) The Consultant shall specify which part of Plate 2.12 of Monitoring of Solid Waste in Hong Kong – Waste Statistics for 2021 shows the quantity of inert C&amp;D materials that were reused on-site to avoid confusion.</p>	<div style="text-align: right; font-size: small;">Report on Strategy for Management and Reduction of Construction and Demolition Waste in Hong Kong</div> <p style="text-align: center;">Figure 4 Sorting results of All Sites</p> <p>(b)At this preliminary design stage, detailed information is not available for specific condition as per the comment. Therefore, the 52.9:47.1 ratio as proposed by CIC, is applied to be representative.</p> <p>(c) In fact, the onsite reused quantity on Waste Statistic for 2021 was not used as reference. The reuse of inert C&amp;D is tentatively proposed by project team at 20% at this preliminary design stage. However, detailed procedures on site in terms of sorting, segregation, detailed waste reduction strategy shall be provided at the detailed design stage.</p>
		<p>26. Response-to-Comment (20) - Section 5.3.12</p> <p>(a) The second sentence is incomplete, of which the anticipated excavation depth was not discussed. Please carefully review and update the information as appropriate.</p> <p>(b) The Consultant is advised to review and update the</p>	<p>(a)The excavation depth and area are provided in Table 5-1 of the revised report.</p> <p>(b) The quantity has been revised in the updated report.</p>



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		<p>estimated quantity of excavated soil as per Comment (25) below.</p>	
		<p>27. Response-to-Comment (20) - Table 5-2</p> <p>(a) Please clarify and elaborate on the meaning of “Floor Height + Estimated Depth for Structure”.</p> <p>(b) The proposed depth of excavation does not tally with the basement headroom as illustrated in the revised Master Layout Plan (i.e., Section A-A: 4m for B1/F; Section B-B: 5.75m for B1/F, Section C-C: 5.75m for B1/F and 3.5m for B2/F) in Enclosure 2 of the Planning Statement. Please review and update as appropriate.</p> <p>(c) Please clarify the meaning of “maximum 10m”.</p>	<p>(a) “Floor Height + Estimated Depth of Structure” means that the thickness of the slabs should also be considered in addition to the floor height. To avoid confusion, the table title has been changed to “Floor Height + Slab Thickness”</p> <p>(b) The level shown in the Master Layout Plan is the floor level of each basement. Depth of excavation refers to the vertical thickness of soil layer to be excavated to construct the basement. That column with the table has been changed to below ground level to avoid confusion. So, our estimation of excavation in the report seems to be correct.</p> <p>(c) Thanks for your observation. The floor level of B2/F is at 9.9mbgl, which is also the deepest level. The number has been revised accordingly.</p>
		<p>28. Response-to-Comment (25) - Table 5-3</p> <p>(a) Please review and update the estimation per the comments above.</p> <p>(b) Inconsistencies in the estimated volume of excavated soil have been identified between Table 5-2 (i.e., 111,895m<sup>3</sup>) and Table 5-3 (i.e., 157,550m<sup>3</sup>), please thoroughly review and properly update the figures.</p>	<p>(a) The table has been revised.</p> <p>(b) The inconsistencies have been revised.</p>

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		<p>(c) The previous comment has not been duly addressed. According to the previously approved EIA Report of Hong Kong - Zhuhai - Macao Bridge Hong Kong Boundary Crossing Facilities (AEIAR-145/2019), different soil and rock materials densities were adopted. Applying 1.8 tonnes/m<sup>3</sup> as a universal conversion factor for all inert C&amp;D wastes in this Project may not be appropriate. The Consultant is advised to provide justification and elaborate on the reason for considering 1.8 tonnes/m<sup>3</sup> as the “most updated factor”.</p>	<p>(c) Your concern about the accuracy of this factor is well noted. To avoid further confusion, the volume to weight factor from USEPA has been applied in the revised report.</p>
		<p>29. Section 5.3.14</p> <p>Some components, such as the quantity of inert C&amp;D material anticipated from soil excavation, do not tally between Table 5-2 (i.e., 111,895m<sup>3</sup>) and Table 5-3 (i.e., 157,550m<sup>3</sup>). Please carefully review the total quantity of inert C&amp;D materials to be generated in the first six months of the project construction and update the calculation as appropriate.</p>	<p>The quantity of inert material has been reviewed and revised in Table 5-3.</p>
		<p>30. Response-to-Comment (27) - Section 5.3.15</p> <p>(a) The Consultant shall provide quantity estimation instead of the target of the Project Team in the evaluation of waste implications related to the management of inert C&amp;D materials. According to the information provided in Section 5.3, an on-site recycle/reuse rate of 6% was identified instead of the targeted 10%. Please review and rectify the estimation accordingly.</p>	<p>(a) The quantity estimation has been provided in Table 5-3.</p>

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		<p>(b) Figures and calculations in this paragraph are confusing. Please carefully review whether the assumption of 10% recycle/reuse rates is reasonable, in particular, the waste generated from the removal of paving is about 4,265m<sup>3</sup>, whereas a quantity of approximately 10,000m<sup>3</sup> was assumed for re-profiling.</p> <p>(c) Please note that the delivery designation of inert C&amp;D materials is subject to the designation by the Public Fill Committee according to DEVB TC(W) No.6/2010.</p> <p>(d) Please carefully review and update the estimation of the daily generation rate of inert C&amp;D material at the site formation stage of the Project.</p> <p>(e) Please review whether it is reasonable to assume a maximum capacity of 50 tonnes for a normal dump truck. If it is deemed reasonable, please provide the specification and</p>	<p>(b) The reuse of inert C&amp;D is tentatively proposed by project team at 20%(from demolition and excavation waste) at this preliminary design stage in the revised report. However, detailed procedures on site in terms of sorting, segregation, detailed waste reduction and reuse strategy shall be provided at the detailed design stage.</p> <p>(c) Noted with thanks.</p> <p>(d) The estimation of daily inert C&amp;D material depends on the detailed demolition procedure and period, detailed superstructure procedure and period and also detailed excavation procedure and period. Therefore, the total waste at this preliminary design stage is tentatively and roughly estimated in the report. The daily estimation of dump truck trip in the report is therefore tentatively only. Detailed information on the waste generation activity in terms of procedures, time, and specific quantity will be provided at detailed design stage.</p> <p>(e) The number is revised to 7.5m<sup>3</sup> as dump truck loading capacity.</p>
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		<p>catalogue of the vehicle for further vetting and to avoid confusion.</p> <p>(f) The Consultant is advised to update the estimation of the number of dump trucks as per sub-comments (d) and (e) above.</p> <p>(g) Please elaborate and clarify the meaning of “flexible construction methodology, waste sorting and management plan” as stated in the R-to-C Table.</p>	<p>(f) The number has been revised based on the tentative estimate from the project team.</p> <p>(g) “Flexible construction methodology, waste sorting and management plan” means design for future reuse of construction material (at the demolition stage) without wasting resources. This also incorporate waste reduction at this stage of the design to minimize resource wastage and disposal.</p>
		<p>31. Response-to-Comment (28) - Section 5.3.16</p> <p>Rather than providing general requirements of C&amp;DMMP in terms of the generation quantity of C&amp;D materials, the Consultant is advised to provide project-specific information and elaborate on the requirement of this Project.</p>	<p>The C&amp;DMMP requires detailed procedure of each step of construction stage, mitigation, construction methodology, and detailed waste management plan, that will be provided at the detailed design stage or before detailed design stage (if available) for EPD and CEDD review.</p>
		<p>32. Response-to-Comment (19) - Section 5.3.17</p> <p>(a) Please review and elaborate on the causal relationship between the preparation of C&amp;DMMP and the existence of adverse waste implications related to the management of C&amp;D materials.</p> <p>(b) The sentence is confusing. Please elaborate on the meaning of “if the C&amp;DMMP can be drafted and followed”.</p>	<p>(a) The sentence has been removed to avoid confusion.</p> <p>(b) The sentence has been removed. The C&amp;DMMP requires detailed procedure of each step of construction stage, mitigation, construction methodology, and detailed waste management plan, that will be provided at the detailed design stage or before detailed design stage (if available) for EPD and CEDD review.</p>

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		<p>(c) The Consultant shall elaborate on the appropriate design, general layout, construction methods and programme that have been considered to minimize the generation of public fill/inert C&amp;D materials and maximize the use of public fill/inert C&amp;D materials for other construction works.</p> <p>(d) The previous comment has not been duly addressed. Please consider revising the first sentence as follows and remove the last sentence as appropriate.</p> <p><del>“Given the above</del> With the proper implementation of the good site practice and recommended mitigation measures as discussed in Section 5.4, no adverse waste impact from the handling, transportation or disposal of inert C&amp;D materials is anticipated during construction of the Proposed Development <del>is anticipated if the C&amp;DMMP can be drafted and followed.”</del></p>	<p>(c) Detailed design information on the project will be provided in the detailed design stage for EPD review.</p> <p>(d) The sentences have been revised.</p>
		<p>33. Response-to-Comment (19) and (31) - Sections 5.3.18 and 5.3.27</p> <p>(a) Please carefully review and update the source of reference material, of which the approved EIA Report shall be revised as “AEIAR-145/2019” instead of “AERAR – 14/2019”.</p> <p>(b) Please revise “non-inert waste” as “non-inert C&amp;D waste” to avoid confusion in Section 5.3.18.</p>	<p>(a) The captioned EIA is no longer used as reference in the revised report.</p> <p>(b) The word has been revised.</p>

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		<p>(c) The previous comment has not been duly addressed. The previously approved EIA Report of Hong Kong – Zhuhai – Macao Bridge Hong Kong Boundary Crossing Facilities (AEIAR-145/2019) does not state that the density of 1.0 tonnes/m<sup>3</sup> was assumed in the assessment and evaluation. Please review and supplement the extracted pages for supporting information and thoroughly review the entire submission.</p>	<p>(c) The captioned EIA is no longer used as reference in the revised report.</p>
		<p>34. Response-to-Comment (30) - Section 5.3.19</p> <p>(a) The Consultant shall note that the absence of a local GFA-based estimation method is not considered as a reasonable justification to support the adoption of the USEPA method. The Consultant shall carefully review and confirm the validity of its application with the Project Engineer.</p> <p>(b) Please clarify whether the estimated quantity of non-inert C&amp;D materials covers all five industrial buildings and residential buildings as specified in Table 5-1.</p> <p>(c) The previous comment has not been duly addressed. The Consultant shall graphically present the location and extent of the concerned building and temporary structures and provide the site area for further review and vetting.</p>	<p>(a) As agreed with the project team, the USEPA method for estimating demolition waste generation rate has been replaced with another reference Estimating and calibrating the amount of building-related construction and demolition waste in urban China.</p> <p>(b) Table 5-1 has covered all identified existing structure.</p> <p>(c) The location of the existing structure has been provided in Figure 5-1.</p>

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		<p>The response “The temporary structures are still under review and will be completed by the project team before construction” is unsatisfactory and could not substantiate the validity of the quantity estimation and assumptions adopted. According to Section 6.3.2, consent for access to the site has been granted by all landlords within the Project Site. The Consultant shall conduct a site inspection to verify the assumption and site condition.</p> <p>(d) The estimation of building GFA does not tally between Table 5-1 (i.e., 7,493m<sup>2</sup>) and Section 5.3.19 (i.e., 5,379m<sup>2</sup>). Please review and clarify.</p> <p>(e) The Consultant is advised to elaborate on the calculation for the generation of 3,018 tonnes of non-inert C&amp;D material from building demolition works.</p> <p>(f) Please clarify why adopting the same generation rate for buildings in different materials is considered appropriate.</p>	<p>(d) The estimation of floor area has been revised by using CFA for consistency with the referencing Estimating and calibrating the amount of building-related construction and demolition waste in urban China.</p> <p>(e) The calculation has been revised.</p> <p>(f) By adopting the new reference, the generation rate of demolition of steel and concrete structure has been considered separately.</p>
		<p>35. Response-to-Comment (22) - Section 5.3.20</p> <p>(a) The previous comment has not been duly addressed. The Consultant shall note that (i) some of the construction activities</p>	<p>(a) In the revised report, the waste generation during each stage of construction period has been calculated separately.</p>

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		<p>would generate more inert C&amp;D materials / non-inert C&amp;D materials, and (ii) some inert C&amp;D materials were reused in the same development project or disposed of at sorting facilities (excluded in the preparation of waste statistics). The current assumption, with 6% of construction wastes regarded as non-inert in nature, is inaccurate, of which the misinterpretation of information from the reference material may lead to significant errors in the estimation. The Consultant is advised to review the estimation approach carefully.</p> <p>(b) The current estimation approach, without considering the nature of development, construction activities and site-specific conditions, could not accurately reflect the project requirement and proportion of non-inert C&amp;D materials. The Consultant is advised to review and update the estimation rationale as appropriate.</p>	<p>(b)The estimation has been updated by adopting a more updated reference from CIC 5.3.13 <i>The Report on Strategy for Management and Reduction of Construction and Demolition Waste in Hong Kong</i>. However, detailed information on construction procedure will be provided in detailed design stage.</p>
		<p>36. Response-to-Comment (32) - Section 5.3.23</p> <p>(a) The previous comment has not been duly addressed. The Consultant shall note that Yard Waste Recycling Centre (Y-PARK) are not responsible for recycling all types of non-inert C&amp;D materials. Please specify the components of waste that are suitable for recycling at Y-PARK.</p> <p>(b) The disposal site for non-inert C&amp;D materials shall be agreed upon with EPD instead of CEDD. Please review and rectify accordingly</p>	<p>(a) Disposal at Y park may not be necessary since there is no significant vegetation or tree to be removed from the site.</p> <p>(b) Revised as suggested.</p>



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		<p>37. Response-to-Comment (33) - Section 5.3.23</p> <p>(a) Referring to the response in the R-to-C table, the Consultant shall provide quantity estimation instead of the target of the Project Team in the evaluation of waste implications related to the management of non-inert C&amp;D materials. Please clarify whether the 10% recovery rate has been confirmed by the Project Engineer.</p> <p>(b) Please elaborate on the “flexible construction methodology, waste sorting and management plan” that could help recover non-inert C&amp;D materials.</p> <p>(c) Referring to the R-to-C table and the revised EA report, the previous comment has not been duly addressed. The Consultant shall note that the transportation arrangement mentioned in Section 5.3.15 is exclusively for the management of inert C&amp;D materials. Please separately assess the requirements for non-inert C&amp;D materials to avoid confusion.</p> <p>(d) Please revise “non-inert materials” as “non-inert C&amp;D</p>	<p>(a) The reuse percentage as agreed with the project engineer, has been revised to 20% for demolition and excavation material.</p> <p>(b) “flexible construction methodology, waste sorting and management plan” means the design that consider waste reduction strategy, both inert and non-inert for the non-inert material in terms of timber, woods, formworks, rebar, etc, the design considers minimizing the use od material at the construction stage. Multiple reuse and full reuse at the future demolition stage to avoid material wastage.</p> <p>(c) The calculation has been revised separately.</p> <p>(d) Has been revised.</p>
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		<p>materials” to avoid confusion.</p>	
		<p>38. Response-to-Comment (19) - Section 5.3.25 The previous comment has not been duly addressed. Please consider revising the paragraph as follows: “<del>Given the above</del> With the proper implementation of the good site practice and recommended mitigation measures as discussed in Section 5.4, no adverse waste impact from the handling, transportation or disposal of non-inert C&amp;D materials is anticipated during construction of the Proposed Development is anticipated. Control measures are proposed in Section 5.4 for the identified waste management implications.”</p>	<p>The sentences have been revised.</p>
		<p>39. Response-to-Comment (33) - Section 5.3.28 The Consultant has already estimated the daily generation rate of general refuse during the construction phase, it is considered unnecessary to re-convert the total estimated quantity throughout the entire construction period back to the quantity per day. Please consider revising the sentence as follows to avoid confusion. “<del>An estimated</del> It is estimated that approximately 40.6 tonnes of general refuse may be generated throughout the entire 24 months construction period, equivalent to around 0.07 tpd on average.”</p>	<p>As agreed with the project engineer and project team, the construction period has been revised to 5 years (60 months). Estimation of general refuse has been revised accordingly in Table 5-3. Also, the captioned sentence has been revised in Section 5.3.16. However, detailed information on the waste management procedure, waste reduction, including the general refuse should be provided at the detailed design stage for EPD review before the construction.</p>
		<p>40. Response-to-Comment (19) - Section 5.3.30 The previous comment has not been duly addressed. Please</p>	<p>The revised paragraph has been added to Section 5.5 as summary of mitigation measures.</p>

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		<p>consider revising the paragraph as follows:  <del>“Given the above</del> With the proper implementation of the good site practice and recommended mitigation measures as discussed in Section 5.4, no adverse waste impact from the handling, transportation or disposal of general refuse is anticipated during construction of the Proposed Development <del>is anticipated. Control measures are proposed in Section 5.4 for the identified waste management implications.”</del></p>	
		<p>41. Section 5.3.33                  (a) Please specify the meaning of “licensed collector” to avoid confusion.                  (b) Please elaborate on the disposal site for the asbestos-containing wastes.</p>	<p>(a)The wording about “licensed collector” has been removed.                  (b) The ACMs will be transported to EPD Chemical Waste Treatment Centre.</p>
		<p>42. Section 5.3.35                  The Consultant is advised to review whether mitigation measures and good practices would be properly implemented for the handling and disposal of asbestos-containing materials. If affirmative, please supplement the relevant information for further review.</p>	<p>Detailed waste management procedures, mitigation measures, and detailed construction procedure to minimize the waste, should be provided at the detailed design stage for EPD review before the construction.</p>
		<p>43. Response-to-Comment (40) - Section 5.3.36                  Please specify the meaning of “licensed collector” to avoid confusion (i.e., licensed chemical waste collector).</p>	<p>The word “licensed collector” has been removed.</p>
		<p>44. Section 5.3.37                  Please revise the paragraph as follows:</p>	<p>It has been added to Section 5.5.25</p>

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		<p>“With the proper implementation of the good site practice and recommended mitigation measures as discussed in Section 5.4, no adverse waste impact from the handling, transportation or disposal of chemical waste during the construction of the Proposed Development is anticipated.”</p>	
		<p>45. Response-to-Comment (42) - Table 5-4</p> <p>(a) Please carefully review and update the estimation per the comments above, particularly those related to soil excavation.</p> <p>(b) The previous comment has not been duly addressed. Please revise “Residual C&amp;D Waste” as “Residual inert C&amp;D materials”.</p> <p>(c) Public Fill Reception Facilities are inappropriate outlets for non-inert C&amp;D material. The Consultant is advised to review and update the information as appropriate.</p> <p>(d) Please review whether CWTC is an appropriate disposal site for asbestos-containing materials as per the Code of Practice on the Handling, Transportation and Disposal of Asbestos Wastes.</p>	<p>(a)The table has been fully updated.</p> <p>(b) The table has been updated. The relevant description has been removed.</p> <p>(c)The disposal arrangement has been updated in Section 5.5.13 – 5.5.15</p> <p>(d) The ACM will be disposed to landfill upon agreement with EPD.</p>
		<p>46. Sections 5.3.42 to 5.3.45</p> <p>(a) According to Section 1, a commercial complex is proposed in this Project, please estimate and evaluate the waste implications associated with the general refuse from the C&amp;I sources during the operation phase.</p>	<p>(a) The General refuse estimation from commercial complex has been provided in the up[dated] report.</p>

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		<p>(b) At present, most of Hong Kong's food waste is disposed of at landfills together with other municipal solid waste (MSW). In 2021, some 11,358tonnes of MSW were disposed of at landfills daily. About 3,437 tonnes (30%) of these were food waste, constituting the largest MSW category. The Project Proponent shall review and explore the possibility of collecting food waste alongside other recyclables from both the proposed residential and commercial developments alongside other recyclables during the operation phase.</p>	<p>(b) The suggestion has been added by discussing the possibility of waste segregation in operation phase.</p>
		<p>47. Response-to-Comment (19) - Section 5.3.47</p> <p>(a) Please provide quantity estimation and elaborate on the handling and disposal arrangement of the sludge cake.</p> <p>(b) Please clarify whether chemical wastes is anticipated during the operation phase, in particular, from the operation of STP.</p>	<p>The sludge cake estimation has been added in Section 5.5.</p>
		<p>48. Response-to-Comment (19) - Section 5.4.8</p> <p>The previous comment has not been duly addressed. The handling arrangement of food waste does not tally between Section 5.3.29 and Section 5.4.8, please review and clarify as appropriate.</p>	<p>The inconsistency has been revised by removing the section about food waste generation in construction stage.</p>
		<p>49. Section 5.4.9</p> <p>The paragraph is confusing. The Consultant is reminded not to discuss the handling arrangement and mitigation measures for chemical waste and asbestos-containing materials in the same paragraph to avoid confusion.</p>	<p>The discussion of chemical waste and ACM has been separated.</p>

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		<p>50. Section 5.4.12</p> <p>Please revise the last sentence as follows:</p> <p>“The waste management hierarchy is a concept which shows the desirability of various waste management methods and comprises the following in order of descending preference:”</p>	<p>It has been revised.</p>
		<p>51. Section 5.4.13</p> <p>(a) Please clarify whether alternatives for the disposal of sludge cake has been explored.</p> <p>(b) The Consultant shall elaborate on the disposal requirement of sludge cake (e.g., moisture content) at the landfill sites.</p> <p>(c) Please clarify whether chemical waste is anticipated during the routine operation or maintenance of the STP.</p>	<p>The discussion about sludge cake has been added in Section 5.5.28.</p>
		<p>52. Section 5.4.14</p> <p>]The Consultant is advised to elaborate on the recycling arrangement of general refuse in both the proposed residential and commercial developments.</p>	<p>Detailed procedures for handling general refuse could be provided at the detailed design stage.</p>
		<p>53. Section 5.5.1</p> <p>The Consultant is advised to elaborate on the types of waste anticipated during the construction phase.</p>	<p>The type of waste during construction phase has been added.</p>
		<p>54. Response-to-Comment (49) - Section 5.5.2</p> <p>(a) The entire paragraph, “During the operation phase, the major type of waste generated will be domestic wastes generated from residents of the Proposed Development. Since domestic waste will be collected on a regular basis by waste</p>	<p>(a) the confusing sentence has been removed.</p>

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		<p>collectors and will be disposed of at landfill, and domestic waste will be collected on a regular basis by FEHD or licenced collector, and will be disposed at a landfill managed by EPD, no adverse waste impacts from handling, transportation or disposal are anticipated during operation.”; is confusing, please review and update as appropriate.</p> <p>(b) In addition, please review whether sludge cake and chemical wastes are anticipated during the operation phase.</p>	<p>(b) The waste generation from STP has been added to Section 5.5.28.</p>
		<p>55. Response-to-Comment (50) - Section 6</p> <p>In addition to the submission requirements, the Consultant is advised to elaborate on the method statement for identification and evaluation of the land contamination potential of the site. Please specify that documentary justifications shall be supplemented to substantiate whether there is any potential land contamination issue arising from the past and present land use activities on the proposed development site through desktop review and site survey (e.g., site's land use history, aerial photos, site visit photos, spillage records, potential contamination sources, etc.).</p>	<p>The discussion on land contamination issued has been revised in Section 6.4.4 and 6.4.5.</p>
		<p>56. Response-to-Comment (53) - Section 6.3.2</p> <p>Please clarify what kind of consents were granted by other landlords within the Project Site.</p>	<p>The discussion on land contamination issued has been revised in Section 6.4.4 and 6.4.5.</p>

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		<p>57. Response-to-Comment (54) - Section 6.4.3</p> <p>(a) In addition to storing construction materials, fuel-driven machinery such as forklifts were observed from the site photographic records; please review and elaborate on the evaluation of land contamination potential.</p> <p>(b) The Consultant shall supplement site photographic records to show the paving conditions and the construction materials stored under all the temporary structures (i.e., warehouse).</p>	<p>Even though these activities were observed on site, the site is fully paved and cleaned. There is no evidence for land contamination observed. However, further investigation should be provided at the detailed design stage to clarify this issue.</p>
		<p>58. Appendix G</p> <p>The Consultant is advised to supplement indicative markup to show the locations of potential contamination of land use, such as (i) open area storage, (ii) vehicle maintenance activities, and (iii) warehouse operation.</p>	<p>The location of the workshop and warehouse can be found at Figure 5-1. There is no evidence of land contamination observation on site. However, further investigation should be done by the project team to clarify this issue.</p>
		<p>59. Response-to-Comment (56) and (60) - Section 6.4.4</p> <p>(a) Please clarify why no maintenance works and chemical storage are anticipated for the use of fuel-driven machinery, including but not limited to crawler crane and forklifts. The Consultant shall also elaborate on the site condition, including but not limited to (i) the presence of oil stain, (ii) paving conditions, (iii) chemical/chemical waste storage areas and (iv) housekeeping conditions.</p> <p>(b) Without information related to the nature of the business and the paving condition of Shun Cheong Electrical Products Factory Limited, off-site land contamination potential cannot be</p>	<p>(a) Section 6.4.4 and 6.4.5 has been revised to avoid confusion. At this stage, there is no evidence of land contamination issues. However, further investigation should be done by the project team to clarify this issue.</p>



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		<p>ruled out. The Consultant shall also supplement the site photographic records to substantiate the site observation.</p> <p>(c) The evaluation of the land contamination potential of the vehicle maintenance workshop and open storage yards has not been covered in the site walkover. Please supplement site photographic records and elaborate further.</p>	
		<p>60. Response-to-Comment (56) - Section 6.4.5</p> <p>(a) The first sentence, “Based on recorded nature of the past and present land use activities, no obvious contamination issue was identified. Nevertheless, there is still potential land contamination issues associated with the previous and current activities, including open storage yards and vehicle maintenance works” is confusing. Please clarify whether there is potential for land contamination from past and current land use and activities within the Project Site.</p> <p>(b) It is understood that some locations remain in operation, the Consultant may further devise sampling and testing methodology and the sampling locations upon site reappraisal. The Consultant shall specify such requirements in the main text as appropriate.</p> <p>(c) Despite the exact sampling locations yet being finalized, the Consultant is advised to graphically indicate and elaborate on</p>	<p>(a) The contradicted section has been revised.</p> <p>There is no evidence of potential land contamination at this stage. However, further investigation should be done by the project team to clarify this issue.</p> <p>(b) If there is evidence of potential land contamination after our further investigation at the detailed design stage, the standard procedure for handling land contamination in terms of sampling, CAP, etc, should be followed.</p> <p>(c) Ditto.</p>

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		<p>the areas with land contamination potential.</p>	
		<p>61. Response-to-Comment (55) - Appendix H</p> <p>(a) The previous comment has not been duly addressed. The resolution of the photographic records is poor in general, please review and update as appropriate.</p> <p>(b) The photographic records did not cover (i) internal condition and operation under all temporary structures with warehouse operation, (ii) the vehicle maintenance workshops, and (iii) off-site contamination sources. Please review and supplement.</p> <p>(c) Please clarify where the photographs on Pages 2-4 of the Appendix were taken from.</p> <p>(d) Given that various land uses and operations were identified from the site walkover and desktop review, the Consultant is advised to evaluate their land contamination potential individually through separate site walkover checklists.</p> <p>(e) The site walkover checklist shows that lubricating oils are used in daily operations; please clarify and locate the storage area and supplement relevant site photographic records for</p>	<p>(a) Additional photos have been provided in the revised report for your checking.</p> <p>(b) Ditto.</p> <p>(c) Photo 2 is taken within the open storage yard, photo 3 to 4 are taken within warehouse.</p> <p>(d) As mentioned for other comments, there is no evidence of potential land contamination issue during the site visit. However, further investigation should be done to clarify this issue at the detailed design stage.</p> <p>(e) There was not any specific storage for lubricating oil tanks. However, some lubrication oil tank stockpiling area is observed on site entrance as shown in Photo 26.</p>

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		<p>further vetting.</p> <p>(f) According to the questionnaire with the existing land user and field observation summarized in the site walkover checklist, chemicals were stored in drums with secondary containment. The Consultant shall supplement enough information for justification and further review.</p> <p>(g) The previous comment has not been duly addressed. According to the site walkover checklist, chemical waste is regularly generated from Carlton Woodcraft Manufacturing Ltd and is currently collected by a licensed chemical waste collector. Such information does not tally with the record provided by the EPD, which is enclosed in Appendix I. Please carefully review and seek clarification with the relevant section of EPD on the registry of chemical waste producers and the Project Proponent. The Consultant shall urgently review the requirement for the registration of CWP and the potential violation of the relevant regulation of Cap. 354.</p> <p>(h) Tung Chun Soy Sauce and Canned Food Company Limited are considered potential off-site sources of contamination. The Consultant shall evaluate and elaborate on the condition and</p>	<p>(f) There is no evidence of potential land contamination.</p> <p>(g) The EPD record provided in Appendix I is related to the past story of the site with no record on chemical incident and land contamination issues. Also, the site visit did not suspect any potential land contamination issue at this moment.</p> <p>(h) The operation condition of Tung Chun Soy Sauce and Canned Food Company Limited should be further investigated to see whether there is any possible land contamination way and impact to the proposed development site. This should be clarified at the detailed design stage.</p>
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		<p>operation of the concerned site for clarity.</p> <p>(i) The previous comment has not been duly addressed. It is noted that lubricating oil is used regularly for PME maintenance; please graphically indicate the storage location and supplement site photos for evaluating the site conditions and existence of hotspots such as oil stains and potential spillage and leakage of chemicals.</p>	<p>(i) Observed location is highlighted in photo 27.</p>
		<p>62. Response-to-Comment (58) - Section 6.4.6</p> <p>(a) Please clarify the meaning of “background research” regarding the “chemical spillage, incident and accidental chemical issues” as mentioned in the first sentence.</p> <p>(b) The second sentence, “Also, we did receive the confirmation from EPD and FSD of chemical incident”, is confusing, please review and update as appropriate.</p> <p>(c) The previous comment has not been duly addressed. The finding of no record of valid/invalid chemical waste producers, as enclosed in Appendix I, contradicts the questionnaire taken in the site walkover checklist. Please confirm that further clarification with the relevant section of EPD has been conducted and supplement the relevant correspondence for the</p>	<p>(a) Simply speaking, background research means investigation on past story of chemical usage on site and past incident or chemical spillage issue on site.</p> <p>(b) We receive EPD and FSD letters for no record of chemical issue of past on site. The sentence has been revised accordingly in Section 6.4.6.</p> <p>(c) EPD and FSD letters only stated about previous chemical incidents or issues record. The presence of storage, workshop or lubricating oil tanks stockpiling did not show any potential land contamination issue on site during site visit. So, there is no contradiction between FSD/EPD letters and site visit checklist.</p>

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		<p>record.</p> <p>63. Response-to-Comment (59) – Section 6.5.1</p> <p>(a) The Consultant shall summarize and indicate the locations that may require further SI works to evaluate the land contamination potential.</p> <p>(b) The second sentence, “It is expected that no land use changes and additional hotspot will be introduced to the project site prior to the development”, is confusing. Given that the concerned sites are still in operation. There is no way to ascertain that no land use change or additional hotspots are anticipated prior to land resumption, especially since different land users currently control the lots. The Consultant shall adequately review and address the previous comment (59) regarding the requirements of site reappraisal. Considering the accessibility issues and the potential land use changes/additional hotspots, the Consultant must conduct further site appraisal within the whole Project Site prior to site clearance to confirm/update the land uses/activities and identify the presence of any additional potential contamination sources.</p> <p>(c) The finding of the investigation is currently incomplete; we will reserve our comments on the conclusion of the land</p>	<p>(a) Further investigation should be done at Shun Cheong Electrical Products and Tung Chun Soy Sauce and Canned Food Company Limited or some nearby factories area to see whether there is any possible land contamination connection from those external areas to the development site at the detailed design stage.</p> <p>(b)The sentence has been revised to avoid confusion in Section 6.5.1. As previously mentioned, further investigation will be done to check whether there any external source of land contamination with connection to site at the detailed design stage.</p> <p>(c) Further investigation will be detailed design stage accordingly.</p>
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		contamination chapter in the subsequent submission.	
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