S12A Application for Amendment of Plan for Proposed Innovation and Technology Hub at Various Lots in D.D. 82 and D.D. 86 and Adjoining Government Land, Man Kam To, New Territories (Application No. Y/NE-MKT/1)
Responses to Departmental Comments – December 2024

Appendix A

Response-to-Comment table

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Comments from Related Departments

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COMMENTS FROM RELATED DEPARTMENTS

No.	Comments	Responses
1.	Environmental Protection Department, Environmental Assessment Division, Territory North Group, Sheung Shui, Fanling, Tai Po, dated 30 May 2024	
	Comments on Appendix I Environmental Assessment Study	
	General and EIAO Implications	
	1. Executive Summary:	
	(i) 3 rd para: Suggest amending to read as " the existing River Ganges Pumping Station and Ta Ku Ling Ying"	Noted and amended as suggested. Please refer to Appendix B of this Further Information for the revised Environmental Assessment Study.
	(ii) 4 th para: please list the identified fixed noise sources	Noted and amended as suggested.
	(iii) 6 th para.: please clarify what the minimum requirement as stipulated in the HKPSG refers?	It refers to 5m setback from local distributor. The above has been supplemented in the 6 th paragraph.
	2. Section 2.3.1.2: Please note Item 1 of Schedule 3 to the EIAO has been updated in June 2023. Please update the wordings pertaining to the revised item accordingly.	Noted and Section 2.3.1.2 has been updated.
	3. Section 2.3.1.3: Since the concerned widened section of at grade Lin Ma Hang Road does not belong to the road types listed under Items A.1 of Schedule 2 to the EIAO. It is considered that there is no need to include the EIAO implications section. Nevertheless, you may wish to highlight the concerned section is a local distributor, with TD's confirmation, in Section 2.1.1.1.	Noted. Section 2.3.1.3 has been revised to exclude the road width and road class.
	4. Sections 2.3.1.5 and 2.3.1.6:	
	(i) Please check against the latest Item I.1 and discuss whether the drainage or river training and diversion works are located less than 300m from the boundary of the listed sensitive areas3	It is confirmed that the proposed drainage works are not located less than 300m from the boundary of the sensitive areas listed in Item I.1. Section 2.3.1.6 has been revised.
	(ii) Please advise whether dredging works will be involved.	Please note that no dredging works will be involved in the Project. Section 2.3.1.5 has been revised to supplement.

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No.	Con	nments	Responses
	5.	Section 2.3.1.7: Item E.3 has been repealed, please remove this section.	Noted and Section 2.3.1.7 has been removed.
	6.	Section 2.3.1.8: Suggest amending to read as " not encroach partly or wholly in an existing or"	Noted and Section 2.3.1.7 (previously Section 2.3.1.8) has been revised as suggested.
	Nois	se	
	Roa	d Traffic Noise	
	1.	TD's endorsement on the traffic forecast shall be documented. Rationale for classifications of some uses as noise sensitive, e.g. data centre, etc. The potential impact on the planned NSRs is also of concern but was not addressed.	The TIA report including traffic forecast is under review by TD. The endorsement letter will be provided once available.
	Fixe	ed Noise Sources	
	2.	Table 5.2: The ASR and criteria shall be moved to Section 5.2.4 to avoid confusion.	Noted. Sections 5.2.3 and 5.2.4 have been swopped to improve the presentation.
	3.	In the future NIA to be carried out under land requirements, the consultant shall review the type of area as (ii) low density residential area consisting of low-rise or isolated high-rise developments is considered more appropriate.	Noted.
	4.	In the future NIA to be carried out under land requirements, the consultant shall review and elaborate their recommendations on the criteria for planned NSRs and existing NSRs. Given their proximity, the criteria shall be the same for consistency.	Noted.
	5.	Background noise measurement details shall be fully documented to support the determination of the criteria, e.g. date, time, location, photos, plan, personnel, equipment, calibration, weather, field observations, etc. as a trade norm.	Noted. The background noise measurement details will be well-documented in the future NIA to be carried out.
	6.	Section 5.2.5.1: In the detail design, the consultant shall ensure no direct line of sight from the NSRs to the proposed exhausts and also reconfirm those assumption, e.g. enclosing all mechanical plant, including chiller plant, etc.	Noted.

No.	Comments	Responses
	Construction Noise	-
	7. Section 6.1.1.1: ProPECC PN 1/24 shall also be included in this section.	Noted and has been supplemented.
	8. Section 6.2.1.2: The consultant shall also explore the practicability of at receiver mitigation measures to minimise the construction noise impact to NSRs in close proximity.	Noted and has been supplemented in Section 6.2.1.2.
	9. Section 6.3.1.1: Quieter equipment shall also be adopted. The relevant sample contract specifications for noise mitigation measures shall be adopted as appropriate in accordance with ProPECC PN 1/24.	Noted. Section 6.3.1.2 has been added to supplemented.
	Air Quality	
	Paragraph 7.1.4.1: "Air Pollution Control (Fuel Restriction) Regulation" should read "Air Pollution Control (Fuel Restriction) Regulations". Please amend.	Noted and revised in Section 7.1.5.1.
	2. Section 7.1.5: Please also present the buffer distance requirement for odour source.	It is supplemented in Table 7.2.
	3. Paragraph 7.2.1.8: Please provide the construction programme and the tentative completion year in order to justify why the data for year 2025 is quoted.	Noted and supplemented in Section 7.2.2.1. As the tentative population intake year is 2028, the data for 2025 is adopted.
	4. Paragraph 7.2.1.9: Please refer to PATHv3.0 instead of PATHv2.1.	It is updated to PATH 3.0.
	5. Table 7.5: Please check all the values which do not match with the data from PATH.	Ditto.
	6. Figure 7.1: Please show a complete 500m assessment area.	Noted and revised.
	7. Section 7.3:	
	(i) 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	Section 7.3.1.2 has been supplemented with latest available information of site formation area, excavation area, excavation volume, number of trucks, and trip frequency.

No.	Comments	Responses
	dump trucks and mechanical equipment to be used per time over the work site.	
	(ii) Please confirm whether there are any concurrent projects in the surrounding area and if positive, their cumulative air quality impact shall be addressed.	Section 2.4.1.1 has been supplemented. There is no concurrent project in the surrounding area.
	(iii) Please formulate an EM&A programme e.g. suitable dust monitoring, weekly site audit for the construction dust impact.	As the Project does not fall into any Schedule 2 and 3 of EIAO, EM&A programme is considered not necessary.
	8. Figure 7.2 and Table 7.6: Please identify the nearby ASRs on the southern and western side of the proposed development within the assessment area.	Figure 7.2 and Table 7.6 have been updated.
	9. Paragraph 7.3.1.4: In view of the proximity of the ASR A1 to the proposed development, please further explore the enhanced dust mitigation measures e.g. avoidance of construction works during school hours.	Noted and supplemented.
	10. Please identify the ASRs of the proposed development during operation phase and compare the distance between the ASRs and the emissions sources against buffer distance requirements in HKPSG.	It is supplemented in Section 7.4.1.2. The nearest Planned Air Sensitive Receiver from the emission source is identified as the R&D centre.
	11. Paragraph 7.4.1.2: Please provide confirmation from TD about the road type of Lin Ma Hang Road instead of referring to an EIA study.	The confirmation of the road type of Lin Ma Hang Road by TD has been enclosed in Appendix 7.1.
	12. Section 7.5:	
	(i) Please clarify whether site visits were conducted to collect the chimney data and provide the details e.g. date and time if affirmative.	It is supplemented in Section 7.5.1.1. Site visit is conducted in June to September 2022.
	(ii) Please check whether there is any chimney emission from the Luofang Sewage Treatment Plant.	Based on aerial photo review, no chimney is observed at the Luofang Sewage Treatment Plant. Other than that, there is no relevant information publicly available. Even if there is chimney, the Luofang Sewage Treatment Plant is located more than 200m away from the proposed development which satisfying the HKPSG setback distance requirements.

No.	Comments	Responses
	(iii) Please be reminded that it is the responsibility of the applicant and their consultants to ensure the validity of the chimney data by their own site surveys. Should the information of industrial chimneys be subsequently found to be incorrect, the assessment result presented in the planning application would be invalid.	Noted and it's based on the site visit as supplements in Section 7.5.1.1.
	13. Section 7.6:	
	(i) We note that there are pigsties on the western side of the proposed development. Please check whether buffer distance requirements for the odour sources could be met. If the HKPSG requirements could not be fulfilled, quantitative cumulative impact assessment would be required to evaluate the potential air quality impact to confirm the compliance of the prevailing AQOs criteria.	It is supplemented in Section 7.6.1.2. The pigsty is identified over 200m and fulfils the HKPSG's requirement.
	(ii) Please make reference to the EIA study and the EM&A data (if any) e.g. Development of Lok Ma Chau Loop (AEIAR-176/2013) for the odour impact of Shenzhen River and Expansion of Sha Tau Kok Sewage Treatment Works (AEIAR-207/2017) for the predicted odour impact from the proposed sewage treatment plant.	S7.6.1.1 has been updated with reference of EIA study of Development of Lok Ma Chau Loop (AEIAR-176/2013). As the detailed design of the proposed sewage treatment plant is not available at this stage, the assessment method in Expansion of Sha Tau Kok Sewage Treatment Works (AEIAR-207/2017) is not applicable.
	14. Paragraph 7.6.1.1: Please provide the references for "As stipulated in HKPSG for odour sources, Shen Zhen River and Ping Yuen River are not regarded as an odour source." Please provide a figure to demonstrate that Loufang Sewage Treatment Plant is 200m away from the proposed development.	The content for HKPSG has been removed in Section 7.6.1.1. Figure 7.4 has been added to indicate separation distance between the sensitive users and Loufang Sewage Treatment Plant.
	15. Paragraph 7.6.1.2: Please check with regional office of EPD to see if there are any odour complaints.	As stated in Section 7.6.1.3, several site visits have been conducted and no odour smell was perceived at the Application Site. Besides, no existing odour source is identified within 200m from the application site. Nonetheless, mitigation measures such as odour removal system (i.e. activated carbon filter or selective catalytic filter etc.) will be implemented where necessary to minimize any odour impact.

No.	Comments	Responses
		Therefore, the request information of odour complaints is considered not necessary.
	16. Paragraph 7.6.1.3: Please clarify whether the following measures for the proposed sewage treatment plant would be implemented:	Section 7.6.1.5 has been supplemented with using those mitigation measures where applicable.
	❖ Site the sewage treatment plant with good buffering distance from sensitive receivers (Please present the distance between the proposed sewage treatment plant and the nearest off-site ASRs to demonstrate)	Ditto.
	♦ Full enclosure of odourous facilities	Ditto.
	 Provision of deodourising units of at least 99.5% odour removal efficiency at the exhaust vent 	Ditto.
	♦ Locating the exhaust vent as far away from sensitive receivers as possible	Ditto.
	♦ Maintaining negative pressure to prevent foul air from flowing out	Ditto.
	Inhibit the generation of odour compound in liquid phase or removal of the odour compound formed in liquid phase by elevating the pH or providing oxygen source	Ditto.
	Good housekeeping in the sewerage collection systems to prevent the development of anaerobic conditions	Ditto.
	Design modifications such as maximizing the sewerage flow velocity in sewers	Ditto.
	17. Section 7.7: Please discuss whether the nearby roads have sufficient capacities for the induced traffic of the proposed transport interchange so that no traffic congestion would be expected. Please indicate the location of the proposed transport interchange on a figure.	Please refer to the TIA report for capacities for the induced traffic.
	Non-fuel gas dangerous goods risk	

No.	Comments	Responses
	Please discuss whether there are use, storage, transport and manufacture of significant amount of dangerous goods within the proposed development.	As there are no industrial uses proposed in the Application Site, the use of significant amount of dangerous goods is not anticipated.
	Land Contamination Waste and Management Implications	
	1. Para 9.2.1.1: The Project Administrative Handbook for Civil Engineering Works should be in 2022 Edition as indicated in Table 9.1. Please revise.	Noted and revised.
	Water Quality	
	1. Section 2.3.1.4: Please amend typo 'The treated sewage will be discharged to Ping Yuen River.'.	Noted and revised.
	2. Section 10: Please add a section to	Noted and added as Section 10.1.
	illustrate the legislation, standards and guidelines related to water quality impact assessment.	The following sections have been renumbered.
	3. Section 10.2: Please also include pond as WSR and update Figure 10.1 accordingly.	WSR 7 of pond has been added in Table 10.2 and Figure 10.1.
	4. Section 10.3:	
	(i) Please also name 'General Construction Activities' as a source of water quality impact during construction phase. Please include it in Section 10.4 also.	Noted and supplemented in Section 10.4.1 and Section 10.5.1.
	(ii) Please name 'Accidental Spillage of Chemicals' as a source of water quality impact during construction phase. Please state the corresponding mitigation measures in Section 10.4.	Noted and added in Section 10.4.4 and Section 10.5.4.
	5. Sections 10.3.2 & 10.4.2: Please amend title to 'Sewage from Construction Workforce'.	Noted and revised in Section 10.4.2 and Section 10.5.2.
	6. Section 10.3.2.3: Please amend to 'Adequate portable <u>chemical</u> toilets should be provided'.	Noted and revised in Section 10.4.2.3.
	7. Section 10.4.1.2: Please supplement 'All the runoff and wastewater generated from the works areas should be treated so	Noted and supplemented in Section 10.5.1.2.

No.	Comments	Responses
	that all the standards listed in the TM-DSS are satisfied'.	
	8. Section 10.4.2.1: Please amend to 'Sufficient portable ehemical toilets'.	Noted and revised in Section 10.5.2.1.
	9. Section 10.5.2.2: Please amend to 'The treated sewage would be discharge d to Ping Yuen River.'.	Noted and revised in Section 10.6.2.2.
	10. Section 10.5.2.3:	
	(i) Please explain if there is emergency by-pass for the on-site STP.	Please be advised that there is emergency by- pass for the on-site STP. Section 10.6.2.3 and 10.6.2.4 have been supplemented to elaborate.
	(ii) Please amend to 'Contingency measures including standby power supply, alarms and storage tank shall be <u>adopted</u> allowed to prevent'.	Noted and revised in Section 10.6.2.3.
	11. Please include, where appropriate, a WPCO discharge license will be obtained for discharging the treated sewage to Ping Yuen River.	Noted and supplemented in Section 10.6.2.2.
	Sewerage	
	1. Executive Summary and para. 11.1.1.14: As the sewage generated from the proposed development is treated by onsite STP which is not connected to the public sewerage network, please revise as "For water quality, adverse impacts due to construction and operational phases are not anticipated, given mitigation measures and proper connection with public the drainage and sewerage system network should be is maintained."	Section 11.1.1.14 has been revised. For water quality, adverse impacts due to construction and operational phases are not anticipated with the proper implementation of mitigation measures.
2.	Civil Engineering and Development Department North Development Office	
	Department, North Development Office and Planning Department, Studies and Research 1 Section, dated 28 Nov 2024	
	1. The application site falls within the proposed New Territories North (NTN) New Town under the Planning and Engineering (P&E) Study for NTN New Town and Man Kam To commenced on 29 Oct 2021. The P&E Study will guide the detailed planning and implementation of the future	Noted. While the preliminary land use proposal under the P&E Study is to be released, it should be heeded that the proposed rezoning at the Application Site ties in with the planning context of this area under the Northern

No.	Comments	Responses
	developments of the proposed NTN New Town. The public will be consulted on the preliminary land use proposal under the P&E Study in due course.	Metropolis Action Agenda. With its close connection to the Luohu District in Shenzhen, the Application Site is situated in the Boundary Commerce and Industry Zone which is positioned as a BCPs business district and a base for supporting the I&T industry. The proposed I&T Hub at the Application Site therefore responds squarely to the distinctive strategic positioning and development theme of the Zone, forging closer collaboration and creating synergy with the development in Luohu by providing the necessary floor spaces for both Hong Kong and cross-boundary I&T enterprises.
	2. Based on the Northern Metropolis (NM) Action Agenda 2023, the Northern Link Eastern Extension (NOLE) and the Northeastern New Territories Line (NENTL) are proposed to promote the development of the eastern part of the NM with the possible railway alignments/stations passing through Lo Shue Ling area where the application site is located. The proposed NOLE and NENTL connecting to NTN New Town (including Lo Wu and Man Kam To) have also been announced in TLB's "Hong Kong Major Transport Infrastructure — Development Blueprint" released in Dec 2023. From the studies and research perspective, the development potential of Lo Shue Ling area, supporting transport and other infrastructures and community facilities should be holistically reviewed under the P&E Study given the strategic location of the area along a possible railway corridor. Approval of the rezoning application would pose constraints in formulating land use proposals under the P&E Study and might undermine the development potential for the area.	The proposed NOLE and the NENTL have been well-noted. As indicated in the Blueprint, the Application Site does not encroach onto the proposed alignments and stations passing through Lo Shue Ling area. Aligning with the overall objectives of the Northern Metropolis to develop Hong Kong into an international innovation and technology centre, as well as the development theme of this Boundary Commerce and Industry Zone, the proposed I&T Hub by a private initiative is well positioned to take advantage of the flexibility and responsiveness to market trends and opportunities, The proposed I&T Hub by the Applicants will not only complement the planned I&T parks in northern New Territories and Shenzhen, but also expedite the development of the Northern Metropolis without exerting pressure on government expenditure. Relevant bureaux/ departments will be consulted at the detailed design stage, should there be any interfacing issues.
	3. The applicant should justify the technical feasibility, particularly on sufficient infrastructure capacity, to support the subject proposal, in view of the remoteness of the site and before those infrastructure works under the P&E Study are in place. Relevant departments including EPD, TD, WSD, DSD, UD&L of PlanD, etc. should be consulted on	Please be advised that a full set of technical assessment reports, including Traffic Impact Assessment, Drainage Impact Assessment, Sewerage Impact Assessment, Water Supply Impact Assessment, and Environmental Assessment Study, have been circulated to relevant bureaux/ departments for comment to demonstrate the technical feasibility of the

No.	Comments	Responses
	the technical assessments submitted by the applicant for the subject development.	proposed development prior to any infrastructure the works under the P&E Study.
	4. Regarding the response to our comment no. 3 (first bullet), the applicant replied that sufficient area and flexibility had been reserved in the Indicative Scheme for a potential access road and junction connecting the proposed north-south road under NTN New Town, without indicating it in their master layout plan. The applicant should clarify where is the reserved area that will allow flexibility for such future road connection and indicate it on the MLP for reference.	For illustration purpose, kindly refer to Appendix C for the possible future road connection in the Indicative Scheme, subject to the proposed road works under the P&E Study and the detailed design of the proposed development after the approval of this planning application.
	5. It is noted from the master layout plan that the width of the Driveway/EVA varies from 7.9m at the southern section to 10.5m at the northern section, presumably due to the consideration that all traffic generated from the proposed development will be accessed through Lin Ma Hang Road only. The applicant is reminded to assess the scenario that if there will be a connection to the future road system of NTN New Town at the south as mentioned in paragraph 4 above, the proposed 'Driveway/EVA' (or part of it) inside the application site will need to be open for public use and more traffic will be attracted southward to other areas of the NTN New Town and the potential interchange with the future Northern Metropolis Highway at the further south. In this connection, widening of the southern section of the 'Driveway/EVA' to the same width as the northern section (10.5m) and the associated roundabouts may need to be considered.	Please be advised that 7.9m-wide single two-lane carriageway for the whole section of the concerned Driveway/EVA has had sufficient capacity already when the traffic flow induced by the Indicative Scheme would be distributed with two vehicular accesses. Nevertheless, with consideration of uncertainty of the implementation date and the finalised alignment of NTN road network, 10.5m-wide carriageway for the section of the concerned Driveway/ EVA at the northern section is proposed in the Indicative Scheme for conservative approach, assuming the second vehicular access is unavailable.
	6. This is a coordinated reply from PM(N), CEDD and SR1, PlanD.	Noted.
3.	Lands Department, Lands Administration Office, District Lands Office, dated 9 Dec 2024 By using the same numbering of R-to-C at	
	Appendix B as adopted by the applicant, our comments from land administration point of view are as follows:	

No.	Comments	Responses
	(b) & (c) Para. 3(v) and Para. 3(vi) The Applicant has not advised whether TD/HyD and EDB have confirmed that the proposed transport interchange and kindergarten are required by the Government and whether they have agreed to be named as approval authority under lease and take up the monitoring role both at the development stage and the operational stage. Unless facilities are required by the Government and monitored by the relevant B/D, the requirements (including the GFA requirement) for those facilities will not be imposed in the lease conditions.	The proposed transport interchange and kindergarten are proposed to be owned, operated, and maintained by the Applicants. The above proposed arrangement has been included in the previous submission of further information and circulated to TD, HyD and EDB for comment, if any.
	(d) Para. 3(vii) to 3(ix) Our comment concerning the proposed "right of access" still stand.	Noted. Right of access to the existing River Ganges Pumping Station and Ta Ku Ling Ling Ying Public School will be provided. This proposed arrangement has also been included in the previous submission of further information and circulated to TD and HyD for comment, if any. The details of the implementation will be worked out at the land exchange stage.
	For the "Revised Indicative Architectural Drawings" at Appendix A, the amendments are related to design details of the run in/out to the transport interchange, the width of internal roads; and the alignment of footpath, laybys and roundabouts, etc. These are outside the purview of this office and we are not in a position to comment. In this connection, please advise whether TD and HyD have agreed to the proposed access arrangement as indicated on Appendix A as well as the proposed road works outside the "Application Site" (along Lin Ma Hang Road).	Noted. Please be advised that the "Revised Indicative Architectural Drawings" have been circulated to TD and HyD for comment, if any.

No.	Comments	Responses
	The revised technical assessments/ reports and supplementary information in Appendices C – J (excluding Appendix G and Appendix H) are related to geotechnical planning/drainage/sewage/visual/landscape/ water supply and they are outside the purview of this office. Having said that, we would like to reiterate that the various requirements under these technical assessments/reports will not be considered to be incorporated under lease unless relevant B/D request for or are in support of these requirements and agree to be named as approval authority under lease and they should be responsible for monitoring the applicant's compliance at both development stage and operational stage. Please advise whether the concerned technical assessments are being carried out on the basis of "Application Site" Boundary or "Development Site" boundary.	Noted. The full set of technical assessments and supplementary information in support of this S12A Planning Application have been circulated to relevant bureaux/ departments for comment, if any. Please be advised that the Application Site is proposed with the intention to include the Development Site and remaining adjoining land parcels for better rationalisation of boundary and land use zoning. Given that the Indicative Scheme will only take place within the Development Site, technical assessments are carried out based on the boundary of Development Site.

(Last update on 16 Dec 2024)