

30th October 2023

Your Ref.: -

Our Ref.: 2023/(PSIL)BELSKRD2/PSIL/TPB/FI01

By Post and Email (tpbpd@pland.gov.hk)
Town Planning Board Secretariat
15/F, North Point Government Offices
333 Java Road, North Point, Hong Kong

Dear Sirs,

Re: Planning Application under Section 12A of Town Planning Ordinance to Rezone from “Residential (Group D)” (“R(D)”), “Residential (Group E)” (“R(E)”) and an area shown as ‘Road’ to “Residential (Group C)3” (“R(C)3”) on the Approved Ho Chung Outline Zoning Plan No. S/SK-HC/11 at Various Lots in Demarcation District 210 and Demarcation District 244 and Adjoining Government land Ho Chung, Sai Kung, New Territories, Hong Kong

-S12A Application No. Y/SK-HC/6-

I refer to Planning Department’s email dated 17.10.2023 containing comments from various departments including the Environmental Protection Department (EPD) on the captioned application.

Please find enclosed our Response to EPD Comments Table (Enclosure 1 refers).

We look forward to your favourable consideration on the captioned application. Should you have any further queries, please feel free to contact the undersigned.

Yours faithfully,
For and on behalf of
PRUDENTIAL SURVEYORS INT’L LTD



Raymond C H Tam
Technical Director,
Planning and Development
Tel: 2531 8727
Email: raymondtam@pruden.com.hk

FW/RT/rt

Encl. Enclosure 1- Response to EPD Comments Table

cc: (by email)

- Mr. TAI Long Him, Matthew (Town Plnr/Sai Kung 3; Email: mlhtai@pland.gov.hk) of PlanD
- Ms. KONG Sze Nga, Tammy (Sr Town Plnr/Sai Kung; Email: tsnkong@pland.gov.hk) of PlanD
- Applicant



Member of PRUDEN

Our Fellow

Ref: 2023/(PSIL)BELSKRD2/PSIL/PlanD/RtoC_01

Amendment of Plan to Rezone from “Residential (Group D)” (“R(D)”), “Residential (Group E)” (“R(E)”) and an area shown as ‘Road’ to “Residential (Group C)3” (“R(C)3”) on the Approved Ho Chung Outline Zoning Plan No. S/SK-HC/11 Various Lots in Demarcation District 210 and Demarcation District 244 and Adjoining Government land Ho Chung, Sai
Responses to Comments from Environmental Protection Department via Planning Department’s email on 17.10.2023 on the Planning Application No. Y/SK-HC/6 issued on 31.08.2023

Comments from the Director of Environmental Protection for Environmental Protection Department (EPD) via Planning Department’s email on 17.10.2023; Contact Person: Mr. Alan LI (Tel: 2835 1114)		
<u>Comments on Air Quality Impact Assessment (AQIA)</u>		
Item	Comments	Responses
EPD – AQIA1	<p><u>Figure 3.2, S.3.5.1</u></p> <p>While S.3.5.1 has stated that the a 5m road buffer distance would be provided to the adjoining Ho Chung North Road and Luk Mei Chuen Road, no road buffer distance is provided at the east and north of the site to the adjoining road, please clarify.</p>	<p>No buffer distance is proposed to be provided between Luk Mei Tsuen Road at most 3.9m wide because it is not regarded as a local distributor (minimum 7.3m).</p> <p>Reference to the Table 1.1 of the Hong Kong Planning Standards and Guidelines (HKPSG Ch9) Chapter 9 Environment, for the Aspect of Air, “... avoid locating active recreation activities within 5m of local distributors”. Our case could only be considered as Single Track Access. 5m buffer zone does not apply to our case. Air quality impact is not anticipated.</p> <p>Section 3.5.1 has been updated to reflect these changes in the Air Quality Impact Assessment (Version B) (AQIA (Ver. B)) and the amended pages are extracted and enclosed in Attachment 1.</p>
EPD – AQIA2	<p><u>S.3.3.2</u></p> <p>Please confirm whether there are any chimneys identified within 200 from the subject development site apart from the 3 chimneys of Koon Yick Food Manufacturing Company.</p>	<p>Noted. There are no other chimneys identified within 200m from the subject development site apart from the 3 chimneys of Koon Yick Food Manufacturing Company.</p>
<u>Comments on Noise Impact Appraisal (NIA)</u>		
Item	Comments	Responses
EPD – NIA1	<p><u>S.4.4.11</u></p> <p>Pls revise the statements to read as “... blocked by the existing buildings and there is around 150m separation distance between the proposed development and Hiram's Highway,</p>	<p>Noted. It has been amended in the Noise Impact Appraisal (Version B) (NIA (Ver. B)) and the amended pages are extracted and enclosed in Attachment 2.</p>

Amendment of Plan to Rezone from “Residential (Group D)” (“R(D)”), “Residential (Group E)” (“R(E)”) and an area shown as ‘Road’ to “Residential (Group C)3” (“R(C)3”) on the Approved Ho Chung Outline Zoning Plan No. S/SK-HC/11 Various Lots in Demarcation District 210 and Demarcation District 244 and Adjoining Government land Ho Chung, Sai

	no adverse road traffic noise impact is anticipated at the proposed development (fully complying with 70 dB(A) noise criterion)."	
EPD – NIA2	<u>S.4.4.11</u> The 5m buffer zone is not related to noise impact and hence should be removed from the paragraph.	Noted. It has been removed in the (NIA (Ver. B)) and the amended pages are extracted and enclosed in Attachment 2.
EPD – NIA3	<u>S.4.4.1</u> Pls revise the name of section to read as “Operational Phase Noise Impact Assessment”.	Noted. It has been amended in the (NIA (Ver. B)) and the amended pages are extracted and enclosed in Attachment 2.

monitoring station (situated at Tseung Kwan O Sports Centre). Despite this, in terms of geographical location, this monitoring station is considered the closest to the Site. The annual average of air pollutants in $\mu\text{g}/\text{m}^3$ monitored at this station for the year 2022 are summarised in Table 3.3.

Pollutant	Annual Average Concentration ($\mu\text{g}/\text{m}^3$)	AQO
Nitrogen Dioxide (NO ₂)	22*	40
Respirable Suspended Particulates (RSP)	22*	50
Fine Suspended Particulates (FSP)	13*	35

Table 3.3 EPD Air Quality Monitoring Record at Tseung Kwan O Station in 2022

Note: Annual average marked with asterisk denotes the data for calculation did not evenly distribute in the year.

3.5 Findings and Discussion

Operation Phase

Vehicular Emission Sources and Evaluation of Impacts

- 3.5.1 Local traffic including Luk Mei Tsuen Road/ Ho Chung North Road and Hiram's Highway were identified as possible air pollution sources. As confirmed with Transport Department (TD), Hiram's Highway is rural road and Luk Mei Tsuen Road/ Ho Chung North Road is feeder road and the confirmation email from TD dated 3rd July 2020 is attached in Appendix A. In order to minimise the adverse impact on ASRs from potential air pollution source, a separation distance of 5m between the sensitive uses of the proposed development and the road edge of Luk Mei Tsuen Road/ Ho Chung North Road was proposed, which satisfies the buffer distance requirement for Local Distributor (i.e. >5m) for active and passive recreation uses according to Chapter 9 of HKPSG as per Table 3. No adverse vehicular emission impact is anticipated upon incorporation of the required buffer distance as stipulated in Chapter 9 of HKPSG into the master layout plan. The 5m buffer zone between the sensitive uses of the proposed development and the road edge of Luk Mei Tsuen Road/ Ho Chung North Road is shown in Figure 3.2.

Industrial Emission Sources and Evaluation of Impacts

- 3.5.2 As mentioned in Section 3.3, at Koon Yick, there are 3 chimneys like structures at the east façade with diameter of around 20cm and exhaust at around 7m above ground (mAG).
- 3.5.3 The concerned Koon Yick Foods Factory is an active Chinese sauces manufacturer (Food Factory License Number 29 98 803889). Based on site survey conducted on July 6th 2023 all three chimneys were observed to be inactive.

- 4.2.8 As there is no IF in the vicinity and no significant fixed noise sources is visible from the Application Site, ASR of the Application Site and its’ surroundings would be classified “A”.
- 4.2.9 HKPSG suggests that the criterion of the planned fixed noise source should be ANL -5 dB (A), or the prevailing background noise level, whichever is lower. The planning criteria would be 55 dB(A) for day and evening time and 45 dB(A) for night time, or the prevailing background noise level, whichever is lower.

4.3 Construction Phase Noise Impact Appraisal

- 4.3.1 For the construction phase although the project site is small and only demolition of temporary structures is required, mitigation measures are proposed to minimise the noise impact to the surrounding.
- 4.3.2 Major noise emitting activities during the construction phase will be the foundation works.
- 4.3.3 The use of Powered Mechanical Equipment (PME) will generate construction noise nuisance to the nearby NSRs. As the project site is small, the number of PME that it can accommodate is limited. To minimise noise generation, non-percussive piling method for foundation work is proposed. As these activities would only last for a short period of time, significant noise impact on sensitive receivers is not expected with proper implementation of mitigation measures:
- adopt good site practice, such as throttle down or switch off equipment unused or intermittently used between works;
 - regular maintenance of equipment to prevent noise emission due to impairment;
 - position mobile noisy equipment in locations away from NSRs and point the noise sources to directions away from NSRs;
 - make good use of other structures for noise screening;
 - use of quiet plants and working methods to mitigate at source;
 - use of mobile noise barriers/enclosures along the path of noise propagation; and
 - schedule work to minimise concurrent activity and duration of impact
- 4.3.4 With the proposed mitigation measures properly implemented, no adverse noise impact arising from the construction of the proposed development is anticipated

4.4 Operational Phase Noise **Quality** Impact Assessment

- 4.4.1 As stated in Section 3.1.1, the proposed development is planned for residential purpose only. The closest identified NSRs in each direction are ~40m in north (77 Luk Mei Tsuen); ~25m in north-west (103B Luk Mei Tsuen); ~110m in the west (156 Ho Chung); ~15m in south- east (108 Luk Mei Tsuen) of the Application Site. It is expected that the proposed development is not visible from the nearby NSR in other directions. The proposed development is planned to equip with windows type or split type air conditioners which do not cause potential noise impact. As the distance correction with 15m distance is around 31.5 dB(A) (for SWL) or 23.5 dB(A) (for SPL measured at 1m), with the noise level of typical split type AC unit¹, no adverse noise impact on the surrounding is anticipated. Without centralised ventilation and/or air conditioning system nor underground carpark provision, no major fixed noise source is anticipated

4.4.9 In conclusion based on the above assessment no adverse noise impact from potential fixed noise sources to the proposed development is anticipated.

Traffic Noise

4.4.10 Despite the Application Site is located in rural area, and the nearby major road, i.e. Hiram’s Highway, is classified as Rural Road, the daily traffic flow of Hiram’s Highway is around 24,000 (according to ATC2021). Thus, traffic noise is considered as one of the major potential noise impacts.

4.4.11 As the line-of-sight between the most affect road, i.e. Hiram’s Highway, and the Application Site is mostly blocked by the existing buildings, the increase in traffic noise level is still at manageable level (fully complied with 70dB(A) noise criterion), and there is around 150m separation distance between the proposed development and Hiram's Highway, no adverse road traffic noise impact is anticipated at the proposed development (fully complying with 70 dB(A) noise criterion). In addition, special architectural windows will be installed at the houses with a 5m buffer zone being preserved between the curbed side windows of the proposed houses and the nearest road to minimise the noise impacts brought to the proposed development.

5. Conclusion

5.1.1 A Noise Impact Appraisal has been carried out to evaluate the potential noise impacts likely to arise from the proposed development.

5.1.2 The key noise issues associated with the proposed development are potential construction noise impact during construction phase; as well as potential road traffic noise impact and potential noise impact from fixed sources during operational phase.

5.1.3 With the proposed mitigation measures properly implemented, no adverse noise impact arising from the construction of the proposed development is anticipated.

5.1.4 The proposed development is not considered a fixed noise source during its operation phase. Both road traffic and fixed noise sources do not induce adverse noise impact to the proposed development during its operation.

5.1.5 In conclusion, no noise impact is anticipated for the proposed development.