

Table | 1

Response-to-Comments

**Section 16 Planning Application No. A/YL-TT/595**

Proposed Minor Relaxation of Plot Ratio Restriction for Proposed Flat at Lot Nos. 4988 and 4996 in D.D.116, Tai Tong Road, Tai Tong, Yuen Long, New Territories

*Further Information (1)*  
*Responses-to-Comments Table*  
*14 August 2023*

**Responses-to-Comments Table**

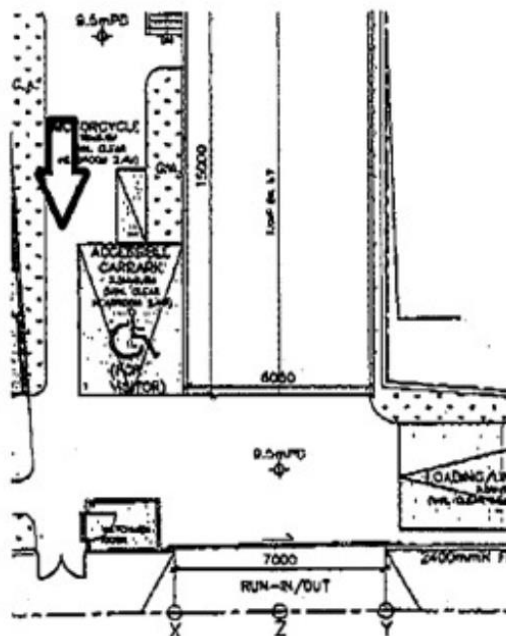
Date	Department	Comments	Responses
8.6.2023	Landscape Unit, Planning Department	The applicant confirmed in Item 9 - "Impacts of Development Proposal" of Form No. S16-I that "NO" Tree Felling, "NO" Landscape Impact would be caused under the proposed development. According to Section 4.4 of the planning statement, it is noted "soft landscape measures including heavy standard trees, shrubs, groundcovers and climbing plants are proposed along the edge of the application site to create soft planted edges. Moreover, several landscape zones are proposed at G/F and R/F of the proposed development...also tree and shrub planting along the internal access road and common landscape area". Though a master layout plan is included in the planning statement, the applicant should provide a landscape proposal to demonstrate the proposed landscape setting as mentioned in Section 4.4 for the enjoyment of the users on proposed development.	Currently, the application site lacks any landscaping or green features, in order to improve the landscape quality of the area, it is proposed that <b>species suitable for the location would be planted at the private landscaped area and selection of plant combination will be added to the rooftop of the proposed flat providing visual gradation of the development and visual amenity to the surrounding premises</b> . If it is further required and considered essential, the Applicant will submit a landscape proposal and further implement additional landscape planting to the satisfaction of Planning Department by way of compliance of approval condition(s).

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12.6.2023	Transport Department (TD)	1. The proposed L/UL space (i.e. 3.5m X 7.0m) could not accommodate vehicle for moving house and /or Refuse Collection Vehicle. The applicant should review;	Noted. The revised layout plan provides a L/UL space for HGV (3.5m X 11.0m) (See <b>Appendix 2</b> ) and adequate space for maneuvering in Figure SP-01 (See <b>Appendix 3</b> ).
		2. The applicant shall provide swept path of the proposed L/UL space, the motorcycle parking and the disabled parking space near the proposed run-in/out;	Noted. The swept analysis demonstrates that there is sufficient maneuvering space within the application site in Figure SP-01 to SP-10 (see <b>Appendix 3</b> ).
		3. The width of the gap for motorcycle to/from the run-in/out seems too narrow. The applicant should specify the dimension and review;	The revised layout plan provides a sufficient clear width for motorcycle traffic. The swept analysis demonstrates that there is sufficient maneuvering space for motorcycle in Figure SP-10 (see <b>Appendix 3</b> ).



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		<p>4. Comments on the Traffic Impact Assessment</p> <p>a. Para 3.3:</p> <p>i. The applicant shall specify the exact date of the traffic survey;</p> <p>ii. The identified peak hours were different from TD's record. Please review your traffic survey data.</p>	<p>To review the peak hours of traffic in Tai Tong, we conducted additional classified turning movement count survey at key junctions in the study area. This survey took place on a typical weekday in June 2023, from 7:00am to 10:00am in the morning, and from 4:00pm to 7:00pm in the evening. We identified the morning and evening peak hours of the road network to be from 7:30am to 8:30am and 5:45pm to 6:45pm, respectively.</p> <p>Our analysis revealed that there was no significant change in traffic volume, nor any traffic impact on the junction capacity assessment. Consequently, these findings did not alter the conclusions of the initial Traffic Impact Assessment Report. We have incorporated a summary of the updated traffic flows and junction capacity assessment into the revised Traffic Impact Assessment Report (see <b>Appendix 3</b>).</p>
		<p>b. Para 4.1: The proposed development is a R(D) zone instead of a R(B) zone. The applicant shall not apply R(B) zone trip generation for the proposed development;</p>	<p>Noted. Traffic Rate of Private Housing: Low-Density / R(C) with average flat size 180m<sup>2</sup> is adopted for the design. The updated table 4.1 of revised Traffic Impact Assessment Report is shown below.</p>

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			<div>Table 4.1     Development Traffic Generation</div> <table><tr><th rowspan="2">Development</th><th colspan="2">Generation</th><th colspan="2">Attraction</th></tr><tr><th>AM Peak</th><th>PM Peak</th><th>AM Peak</th><th>PM Peak</th></tr><tr><td colspan="5">Trips rates<sup>1</sup> (pcu/hr/flat)</td></tr><tr><td>Private Housing: Low-Density/ R(C) Average Flat Size: 180m<sup>2</sup> (Mean)</td><td>0.2772</td><td>0.1635</td><td>0.1769</td><td>0.2394</td></tr><tr><td colspan="5">Trips (pcus/ hour)</td></tr><tr><td>No. of Flats: 16</td><td>4</td><td>3</td><td>3</td><td>4</td></tr></table> <p>Upon review, we found no significant changes in both the traffic trip generation and the attraction trips. Therefore, these findings did not alter the conclusions of the Traffic Impact Assessment Report.</p>	Development	Generation		Attraction		AM Peak	PM Peak	AM Peak	PM Peak	Trips rates <sup>1</sup> (pcu/hr/flat)					Private Housing: Low-Density/ R(C) Average Flat Size: 180m <sup>2</sup> (Mean)	0.2772	0.1635	0.1769	0.2394	Trips (pcus/ hour)					No. of Flats: 16	4	3	3	4
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		c. Para 5.2 – Parking Provision: Please specify the bicycle parking space, 1 bicycle parking space per 15 flats should be provided;	<p>Based on the proposed development's flat sizes and quantities (4 flats ≤ 40m<sup>2</sup> and 11 flats between 40 and 70m<sup>2</sup>), the minimum requirement for the provision of bicycle parking for the development should be (4+11)/15=1.</p> <p>Size of the bicycle parking space adheres to Transport Planning and Design</p>																													

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			<p>Manual (TPDM) Volume 3 Chapter 6.5 Section 3, i.e., 1.8m in length, 0.8m in width, and 2.4m in height. The updated table 5.1 of revised Traffic Impact Assessment Report is shown below.</p> <p><b>Table 5.1 Car Parking Provisions</b></p> <table><tr><th rowspan="2">Type</th><th colspan="4">Parking Requirements Under HKPSG</th><th rowspan="2">Required Provision</th><th rowspan="2">Proposed Provision</th></tr><tr><th colspan="4">Standard</th></tr><tr><td rowspan="9">Private Car Parking Space</td><td colspan="4">Parking Requirement = <math>\Sigma GPS \times R1 \times R2 \times R3</math></td><td rowspan="9">4 - 6 (Include 1 no. of accessible car park)</td><td rowspan="9">6* (Include 1 no. of accessible car park)</td></tr><tr><td>Flat Size (m<sup>2</sup>)</td><td>FS≤40</td><td>40&lt;FS≤70</td><td>70&lt;FS≤100</td></tr><tr><td>Flats No.</td><td>4</td><td>11</td><td>1</td></tr><tr><td>GPS</td><td>0.57 - 1.00</td><td>1.57 - 2.75</td><td>0.14 - 0.25</td></tr><tr><td>R1</td><td>0.5</td><td>1.2</td><td>2.4</td></tr><tr><td>R2</td><td colspan="3">1.00 (for outside a 500m-radius of rail station)</td></tr><tr><td>R3</td><td colspan="3">1.30 (for plot ratio &gt;0.00 and ≤ 1.00)</td></tr><tr><td>GPSxR 1xR2x R3</td><td>0.37 - 0.65</td><td>2.45 - 4.29</td><td>0.45 - 0.78</td></tr><tr><td>Total</td><td colspan="3">3.27 – 5.72</td></tr><tr><td>Visitor Parking Space</td><td colspan="4">For private residential developments with 75 units or less per block, the visitor car parking provision will be determined by TD on a case-by-case basis.</td><td>Case-by-case</td><td>1* accessible car park</td></tr><tr><td>Motorcycle Parking Space</td><td colspan="4">1 for every 100 – 150 flats</td><td>1</td><td>1</td></tr><tr><td>Goods Vehicle Loading / unloading Bay</td><td colspan="4">1 for every 800 flats</td><td>1</td><td>1</td></tr><tr><td>Bicycle Parking Space</td><td colspan="4">1 for every 15 flats with flat size smaller than 70m<sup>2</sup></td><td>1</td><td>1</td></tr></table> <p><i>Note: * Provision based on 1 Accessible Parking Spaces for 1 – 50 Parking Space</i></p>	Type	Parking Requirements Under HKPSG				Required Provision	Proposed Provision	Standard				Private Car Parking Space	Parking Requirement = $\Sigma GPS \times R1 \times R2 \times R3$				4 - 6 (Include 1 no. of accessible car park)	6* (Include 1 no. of accessible car park)	Flat Size (m <sup>2</sup> )	FS≤40	40<FS≤70	70<FS≤100	Flats No.	4	11	1	GPS	0.57 - 1.00	1.57 - 2.75	0.14 - 0.25	R1	0.5	1.2	2.4	R2	1.00 (for outside a 500m-radius of rail station)			R3	1.30 (for plot ratio >0.00 and ≤ 1.00)			GPSxR 1xR2x R3	0.37 - 0.65	2.45 - 4.29	0.45 - 0.78	Total	3.27 – 5.72			Visitor Parking Space	For private residential developments with 75 units or less per block, the visitor car parking provision will be determined by TD on a case-by-case basis.				Case-by-case	1* accessible car park	Motorcycle Parking Space	1 for every 100 – 150 flats				1	1	Goods Vehicle Loading / unloading Bay	1 for every 800 flats				1	1	Bicycle Parking Space	1 for every 15 flats with flat size smaller than 70m <sup>2</sup>				1	1
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		d. Pedestrian traffic assessment should be provided;	Noted. The assessment of pedestrian traffic is included in the updated version of the Traffic Impact Assessment Report (see <b>Appendix 3</b> ).
		5. The unnamed road leading to the subject site is not under TD's purview. The applicant shall obtain consents of the owners/managing parties of the local track for using it as the vehicular access to the subject site; and	Noted.
		6. Sufficient space should be provided within the application site for maneuvering of vehicles. In addition, no parking, queuing and reserve movement of vehicles on public road are allowed.	Noted.

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16.6.2023	Environmental Protection Department (EPD)	Having reviewed the submission, it is considered that supplementary information is required to demonstrate the environmental acceptability of the proposed development. For instance, it is noted that the site maybe subject to traffic noise impact from nearby Tai Tong Road (about 15m from the site) and fixed noise impact from the workshops and godowns nearby, and hence a noise impact assessment (NIA) will be required to demonstrate the relevant noise criteria in the HKPSG could be compiled. On the other hand, supplementary information is needed to confirm that the air quality buffer distances recommended in the HKPSG could be satisfied and the dust impact of the proposed redevelopment will be minimized. In addition, while the applicant has indicated that the sewage generated by the development will be discharged to municipal sewerage system underneath Tai Tong Road, we note that there is no public sewer in the vicinity of the site. As such, the applicant is required to propose alternative sewage management system. Our specific comments on the application are given in the attachment for reference, please.	<p>The concern is well noted. To demonstrate the environmental acceptability of the proposed development, an environmental assessment has been conducted to comprehensively assess any potential air quality, noise, water quality and waste management implications associated with the proposed development (See <b>Appendix 4</b>). Due to the small-scale and limited extent of construction, together with the implementation of the recommended mitigation measures, no advise impact on air quality, noise, water quality and waste is anticipated.</p> <p>As there is no public sewerage system available for connection in the vicinity of the proposed development. A septic tank is proposed within the Site for serving 48 population. With the provision of on-site septic tank, the sewage generated will be treated to comply will the WPCO standard prior to discharge. For details, please refer to <b>Appendix 4</b>.</p>
		<p><u>Air Quality</u></p> <p>1. Section 4.5.1</p> <p>a. The consultant should address the constructional</p>	Noted. The impact of construction dust was analyzed in Section 3 of the



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		<p>dust impact arising from the proposed development as follows:</p> <ul style="list-style-type: none"> <li>- Please provide the scale of the dusty activities including site formation and excavation areas, amount of excavated materials to be handled and no. of on-site machinery and dump trucks over the site at a time, etc. to justify that the dust impact would not be adverse with implementation of control measures.</li> <li>- Please identify the nearest ASRs in the vicinity of the proposed development and provide their separation distance from the subject boundary.</li> <li>- Please clarify whether there are any concurrent projects in the surrounding area and their cumulative air quality impact shall be addressed.</li> <li>- Please provide the control measures to be implemented during the construction stage.</li> </ul>	<p>Environmental Assessment Report.</p> <p>The impact during the Construction Phase can be found in Section 3.5.1.</p> <p>Dust generated from site formation, handling of excavated materials, and emissions from construction plants are anticipated to be the primary sources of air quality impact during the construction phase. Given the development's relatively small scale, the implementation of mitigation measures detailed in Section 3.6.1 should ensure that the air quality impact from construction remains low. Consequently, we do not anticipate any significant air quality impact on the Ambient Air Quality Standards and Response Stations (ASRs) in the immediate vicinity.</p> <p>ASRs within a 500m study area were detailed in Section 3.4.</p> <p>No concurrent projects were identified during our site visit in early August 2023.</p> <p>Mitigation measures designed to minimize the construction dust impacts during the Construction Phase are provided in Section 3.6.</p>
		<p>b. The consultant should demonstrate if buffer distance requirements for roads as stipulated in the HKPSG are met for any air-sensitive uses (openable window,</p>	<p>It should be noted that a buffer distance of no less than 5 meters will be maintained from the road to the air-sensitive areas of the proposed development.</p>

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		fresh air intake and recreational uses in open area) of the proposed development. The consultant should refer to the latest TD's traffic census or provide TD's endorsement for the road types of the nearby roads including Tai Tong Road and the local access roads surrounding the project site. Since the local access roads located to the east and to the south of the project site are proposed to be widened/ improved under this project (as mentioned in Section 4.2.2 and shown in illustration 3), their buffer zones shall be determined based on the realigned road kerb side (if any). A map to show the buffer zone for each road surrounding the proposed development shall be provided.	An illustration detailing the site layout and buffer distance can be found in Figure 2.2 (See <b>Appendix 4</b> ).
		c. The consultant shall state clearly how to find out that there is no chimney within 200m. We would like to remind the applicant that it should be 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 as presented in the application would be invalidated. Please also address if there is any air/ odour nuisances arising from the nearby	Noted. Based on the desktop study complemented by the site survey conducted in early August 2023, we did not identify any industrial chimneys or other emission sources within the 500m Study Area. As such, we do not anticipate any adverse air quality impacts from industrial emissions on the Project. For further details, please refer to Section 3.5.2 (See <b>Appendix 4</b> ).

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		areas (e.g. nearby refuse collection point, warehouses and workshops) on the proposed development.	
		d. Please revise the 2nd sentence of "Furthermore, there are no industrial chimneys or other community uses within a 200-meter radius of the application site that could potentially cause odour impact." since if any air emission source is found in the vicinity, it shall not be limited to odour impact.	Noted.
		2. Section 5.9.1 - Please revise the typo of "small in small" in line 1 to 2.	Section 5.9.1 has been revised (See <b>Appendix 1</b> ).
		<u>Noise</u> 3. Based on our preliminary desktop review, Tai Tong Road is located approximately 15m to the east of the site, and there are isolated workshops and godowns nearby, which may have a potential fixed noise impact. The applicant/consultant should conduct a quantitative noise impact assessment to demonstrate that the proposed development will not give rise to an insurmountable noise problem.	<p>The noise impact from the surrounding area on the proposed development has been evaluated.</p> <p>From the traffic count conducted in June 2023, it was observed that the traffic flow on the Local Road and Tai Tong Road during peak hours is 120 and 990 veh/hr, respectively. Considering the moderate traffic noise from both roads and the added shielding effect of the proposed 2.4m fence wall, we anticipate that the proposed development will have sufficient noise protection and will comply with road traffic noise standards.</p> <p>As for fixed noise sources, workshops and open storage areas in the vicinity of the proposed development are enclosed within temporary metal structures, ensuring no direct line of sight from Noise Sensitive Receivers (NSRs) to</p>

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			<p>these noise sources. Coupled with the separation distance from representative NSRs and the 2.4m fence wall of the proposed development, we expect that the fixed noise impact from the workshops and open storage areas on the proposed development will be minimal.</p> <p>For more details, please refer to Section 4.5 for the Road Traffic Noise Impact Assessment and Section 4.6 for the Fixed Noise Sources Impact Assessment.</p>
		<p><u>Sewerage</u></p> <p>4. The applicant stated in para 4.6.2 and para 5.9.3 of the Planning Statement that the sewage generated from the proposed development will be collected and conveyed to the public sewerage system underneath Tai Tong Road. Please note that there is currently no public sewer along Tai Tong Road and the vicinity (nearest sewer is over 100m away from the proposed site along Shui Tsiu San Tsuen Road across other lots). As such, the applicant shall proposed alternative sewage disposal measure to handle the sewage generated from the proposed site.</p>	<p>The proposed development is of a small scale, encompassing only 16 flats and housing approximately 48 residents (less than 50). This figure is an addition of merely 11 individuals when compared to the existing conditions. Given its scale, the sewage and wastewater projected to emerge from the application site are deemed negligible.</p> <p>Despite the absence of a nearby public sewer, the closest one, located along Shui Tsiu San Tsuen Road, is more than 100m away. Connecting to this sewer would necessitate navigating multiple private land lots housing existing village structures. Given potential challenges – such as securing land availability and avoiding conflicts with utilities – designing and implementing a connection to this public sewer is impractical and not cost-effective.</p> <p>To efficiently manage the sewage and wastewater, we will establish a new septic tank and soakaway system, hereinafter referred to as the "STS</p>

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			<p>system." Detailed information about this is available in Appendix I. Given that the proposed development will house roughly 48 residents and does not feature a swimming pool, daily sewage production is estimated to stay below 20m<sup>3</sup>. This volume is well within the treatment capacity of a septic tank/soakaway pit system, which can manage up to 41m<sup>3</sup>. This strategy is in line with the guidelines set out in the HKPSG Chapter 9. It recommends the use of a septic tank and soakaway system for isolated structures housing a limited number of occupants, contingent upon the locale being amenable to the system's functionality.</p> <p>Our new STS system will adhere to the stipulations set out in the Professional Persons Environmental Consultative Committee Practice Note 5/93 (abbreviated as "ProPECC PN 5/93"), which covers clearance distances and the execution of percolation tests. Additionally, an Authorized Person will certify the system. Given these measures, the new STS system represents a substantive enhancement in wastewater treatment for the site, ensuring that no negative sewage-related consequences arise from the proposed development.</p>