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By Email and Hand

Our Ref: S3020b/13WSS_KC/23/006Lg

27 January 2025

Secretary, Town Planning Board
15/F, North Point Government Offices
333 Java Road
North Point
Hong Kong

Dear Sir/Madam,

Proposed Concrete Batching Plant in "Industrial" zone
at Nos.13- 17 Wah Sing Street, Kwai Chung
- Section 16 Planning Application –
TPB Ref.: A/KC/509
Further Information No. 2

Reference is made to the captioned S16 Planning Application submitted to the Town Planning Board ("TPB") on 31 October 2024 and various departmental comments received in December 2024.

In response to the departmental comments received, please find attached 4 hard copies of the Further Information ("F.I.") submission. The submission document consists of:

Response-to-Comment Table
Appendix I Revised Traffic Impact Assessment
Appendix II Revised Environmental Assessment
Appendix III Replacement Pages to the Supporting Planning Statement
Appendix IV Updated Architectural Drawings
Appendix V Revised Sewerage Impact Assessment

Meanwhile, should you have any queries in relation to the attached, please do not hesitate to contact Mr Kenneth To or the undersigned at [redacted].

Thank you for your kind attention.

Yours faithfully
For and on behalf of
KTA PLANNING LIMITED

Gladys Ng

Encl. (4 hard copies)

cc. TWWK DPO – Mr Sam Ho (By Email)
the Applicant & Team

KT/GN/vy

Proposed Concrete Batching Plant in "Industrial" Zone
at Nos.13- 17 Wah Sing Street, Kwai Chung
S16 Planning Application

(Planning Application No: A/KC/509)

Response-to-Comment Table

Comments	Response
Email dated 30 December 2024 refers: **Comments from Trade and Industry Department:** **(Contact Person: Ms Joby LEE Tel: 2398 5551)** 1. Please note that our previous stance remains valid and is recap below. 2. We understand that the planning application for "proposed concrete batching plant" use at the subject premises falling within an "Industrial" ("I") zone is on a permanent basis. We have reservation on the proposed permanent conversion as it may jeopardise the long term use of the subject premises for general industrial uses in S/KC/32.	Demand for concrete within the metro area will increase in response to the vast amount of aged building requiring either rehabilitation or redevelopment. Whilst on-site concrete batching plant would be less likely to happen at the relatively small construction sites in the metro area, the need for having standalone concrete batching plants within the metro area is inevitable. Understand that concrete batching plant is always associated with environmental and traffic concerns, "Industrial" zone (under 'Column 2') is the best available land use zoning that is suitable to accommodate a concrete batching plant. The Applicant has conducted and submitted Environmental Assessment and Traffic Impact Assessment to demonstrate that the proposed concrete batching plant would not create insurmountable adverse impact. The Applicant intends to invest and to deliver a modern and clean concrete batching plant that would bring the least disturbance and impact to the surrounding, therefore he expects the investment would result in a long-term/permanent operation of the new plant. The relatively low cost-effectiveness and high uncertainties of a temporary plant severely affect the financial viability of the plant.

Comments	Response
3. Nevertheless, we would have no specific comment if the proposed conversion is not on a permanent basis.	Noted.
Email dated 30 December 2024 refers: **Comments from Lands Department:** **(Contact Person: Mr Ray CHENG Tel: 2402 1113)**	
1. The application site falls within Section A of Kwai Chung Town Lot No. 111 ("the Lot"), which is held under New Grant No. 4668 dated 14.8.1969 ("the Lease") for a term of 99 years from 1.7.1898 extended to 30.6.2047. In accordance with the Lease, the Lot shall be used for general industrial and/or godown purposes excluding offensive trades. Spaces shall be provided for parking, loading and unloading of motor vehicles at the rate of not less than 1 vehicle for each 10,000ft^2 or part thereof gross floor area but in any event not less than 1 vehicle for each 5,000ft^2 or part thereof of the site area. There is no restriction on building height or gross floor area nor building setback requirement under the Lease.	Noted.
2. According to para. 2.1 on page 2 of the Traffic Impact Assessment at Appendix II of the Supporting Planning Statement, there is a right-of-way ("ROW") for the Lot at KCTL 111 R.P. connecting Tai Lin Pai Road. As there is no such ROW provision stipulated under the land lease of KCTL 111 R.P., please re-check and confirm that such information is correct.	The background information of the ROW has been removed – please refer to para. 2.1 of the revised TIA in ***Appendix I***.
3. The applicant shall comply with the above mentioned provision requirements of spaces for parking, loading and unloading of motor	Noted.

Comments	Response
vehicles to the satisfaction of the Transport Department under Lease.	
4. LandsD reserves comment on the proposed schematic design including the site area which would only be examined in detail during the building plan submission stage. There is no guarantee that the schematic design presented in the subject planning application will be acceptable under the lease if it is so reflected in future building plan submission(s).	Noted.
Email dated 30 December 2024 refers: **Comments from Transport Department:** **(Contact Person: Mr Kenneth LEE Tel: 2399 2420)** The Traffic Impact Assessment (TIA) is considered unacceptable. Please find below our comments for further review by the applicant:	
1. The proposed vehicular access, with a width of 10m, is considered too wide which would cause safety concerns and inconvenience to pedestrians.	The width of the vehicular access has been reduced to only 8.5m. Please refer to **Figure 3.1** of the revised TIA in ***Appendix I***.
2. The applicant should confirm if a back office for the concrete batching plant (CBP) will be provided at the application site.	There is a "back office", i.e. a control room, within the Proposed Concrete Batching Plant. According to BD PNAP APP-120, the "*gross floor area (GFA) of the control room does not exceed 30m² per production line*. Based on this, the control room to be provided within the Proposed Concrete Batching Plant has a maximum GFA of around 120m^2 (Calculation: 30m^2 x 4 production lines), which is considered relatively small in size.

Comments	Response
3. The applicant is requested to provide layout plans of other existing CBP(s) in Hong Kong to demonstrate that the current proposed facilities, especially for parking and L/UL facilities, are adequate for a typical CBP.	For reference, the layout of the Concrete Batching Plant with 3 production lines located at 100 Tam Kon Shan Road in Tsing Yi ("the Concrete Batching Plant in Tsing Yi") can be found in **Appendix 2** of the revised TIA in ***Appendix I***. A comparison of internal transport facilities between the Proposed Concrete Batching Plant and the Concrete Batching Plant in Tsing Yi is presented in **Table R1** below. TABLE R1 COMPARISON OF INTERNAL TRANSPORT FACILITIES **Item** / **The Proposed Concrete Batching Plant (4 production lines)** / **The Concrete Batching Plant in Tsing Yi (3 production lines)** Car parking space / 0 / 1 [5m (L) x 2.5m(W)] Waiting space / 2 [11m (L) x 3.5m(W)] / 2 [9.4m (L) x 3.5m(W)] Raw material loading/unloading bay / 4 / 1 [9.4m (L) x 3.5m(W)] Concrete mixer trucks loading point / 4 / 3 *#1 Car Parking Spaces* **Table R1** shows that there is 1 car parking space at the Concrete Batching Plant in Tsing Yi, where there is limited public transport service. Car parking space is not provided for the Proposed Concrete Batching Plant as the Site is in an area well-served by public transport service with numerous franchised bus routes operating along Kwai Chung Road, i.e. some 400m or less than 5 mins' walk away. In addition, the closest entrance to the MTR Kwai Hing Station is some 750m away or within 10 mins' walk away.

Comments	Response
	#2 Raw material loading/unloading bays In view that some raw materials are delivered to the Concrete Batching Plant in Tsing Yi by barges, only 1 raw material loading / unloading bay is provided. However, the Proposed Concrete Batching Plant which has no marine access, is required to provide 4 raw material loading / unloading bays to meet its operational needs.
4. Para. 3.3 - The applicant should confirm that the two activities, namely delivery of concrete and delivery of raw materials, will never be carried out simultaneously throughout the day.	Due to limited storage capacity for raw materials, the delivery of raw materials is continuous but varies throughout the day.
5. Table 3.1 - The traffic generation appears to be significantly underestimated, as a typical concrete mix truck in Hong Kong should have a capacity of less than $10m^3$.	Due to rising cost in the delivery of ready mixed concrete, most, if not all, new concrete mixer trucks have a capacity of $10m^3$. Hence, the capacity of $10m^3$ for each concrete delivery truck has been adopted.
6. Table 3.2 - The waiting space can either accommodate 2 concrete mixer trucks / heavy goods vehicles or 1 articulated vehicle only. Apparently the proposed 2 waiting spaces are not adequate to cope with a traffic generation of over 60 veh/hour. It would unavoidably force the trucks to wait and queue up on public roads which is unacceptable.	Apart from the 2 waiting spaces, **2 more vehicles** could queue behind the waiting space LP02. In view that the distance between the run-in/out and waiting space LP02 is some 25m, 2 more 11m-long trucks could be accommodated. To ensure smooth operation of the Proposed Concrete Batching Plant and to minimise queueing of vehicles on public roads, the following measures are introduced: (i) the control room will monitor the traffic situation in the Proposed Concrete Batching Plant using CCTVs, (ii) GPS tracking units will be installed in the concrete delivery trucks, (iii) a worker is assigned to monitor the real-time delivery of all raw materials, and (iv) a worker will be deployed at the run-in/out to ensure safe entry and exit of vehicles from the Proposed Concrete Batching Plant.

Comments	Response
7. According to the swept paths, reverse movements are required for nearly all vehicles operating in the CBP. With high traffic flow during operation, the internal traffic condition is considered unsatisfactory.	Reverse movements within a Proposed Concrete Batching Plant (and within the loading areas of buildings) are not uncommon in Hong Kong. Nevertheless, the reverse movements which are confined within the Proposed Concrete Batching Plant will not affect the public roads.
8. Loading space LP03 is not accessible when either LP01 or LP02 is occupied. Subject to the confirmation that there will be no delivery of materials during delivery of concrete, such an arrangement is not acceptable.	Loading bays LP01 and LP02 are only momentarily used when the concrete delivery truck arrive just before a concrete delivery truck departs from the loading point. Hence, the manoeuvring of the tanker to loading space LP03 is not expected to be hindered.
9. Please supplement the swept path of container / concrete mixer truck entering the premises from Wah Sing Street to LP01.	Please refer to **Figure SP101** of the revised TIA in ***Appendix I.***
10. It is doubtful that a traffic flow of over 60 veh/hour can be achieved owing to various factors such as the cycle time required for loading operation for each concrete mix truck, and the limited capacity of the run-in/out which allows one-way traffic only.	The cycle time required for loading operation for each concrete mixer truck is around 7 minutes, hence, there is a time gap of 6 minutes between the loading of each concrete mixer truck. With 4 production lines, a maximum of 40 concrete mixer trucks, i.e. 60mins/6mins x 4 production lines, is generated per hour. The delivery of raw materials have been reviewed and revised, as shown in **Table 3.1** of the revised TIA in ***Appendix I.*** Therefore, during the peak concrete production (0600-1800 hours), the hourly traffic generation is reduced from 62 to 58 vehicles. It should be noted that the peak concrete production normally occurs at the start of the day, and during lunch, but, not throughout the day. However, to be conservative, peak concrete production is assumed for both the AM and PM peak hours.

Comments	Response
11. Para 3.6 - Internal transport facilities should be provided in accordance with HKPSG. In particular, parking facilities should be provided for staff working at the CBP.	According to BD PNAP APP-120, "*the number of personnel in it does not exceed 5 per production line.* Based on this, the Proposed Concrete Batching Plant has maximum of 20 staffs (Calculation: 5 x 4 production lines), which is small. Due to the proximity of public transport services, workers of the Proposed Concrete Batching Plant are expected to commute by public transport services. Hence, no car parking space has been provided.
12. A goods handling platform or area for LP03 should be provided.	A goods handling area for LP03 has been added. Please refer to **Figure 3.1** of the revised TIA in ***Appendix I***.
13. Figure 2.2 - The ingress / egress routes should be provided.	The ingress/egress routes of the Proposed Concrete Batching Plant can be found in **Figure 4.3** of the revised TIA in ***Appendix I***.
14. Figure 4.3 - The further improvement involving a split-phase MOC at J/O Tai Lin Pai Road/Kwai On Road is undesirable as the traffic light signals can easily be blocked by heavy vehicles.	Proposed secondary signal has been added on Tai Lin Pai Road to ensure that right-turn traffic from Kwai On Road to Tai Lin Pai Road can see the traffic signal changing from red to green and will not blocked by heavy vehicles. Please refer to **Figure 4.4** of the revised TIA in ***Appendix I***.
Further comments received on 10 January 2025 I refer to your submission of further information, including a revised TIA, dated 31.12.2024 regarding the captioned.	
1. The proposed vehicular access, with a width of 10m, is considered too wide which would cause safety concerns and inconvenience to pedestrians.	The width of the vehicular access has been reduced to only 8.5m. Please refer to **Figure 3.1** of the revised TIA in ***Appendix I***.

Comments	Response
2. The applicant should confirm if a back office for the CBP will be provided at the application site.	There is a "back office", i.e. a control room, within the Proposed Concrete Batching Plant. According to BD PNAP APP-120, the "*gross floor area (GFA) of the control room does not exceed 30m² per production line*. Based on this, the control room to be provided within the Proposed Concrete Batching Plant has a maximum GFA of around 120m^2 (Calculation: 30m^2 x 4 production lines), which is considered relatively small in size.
3. The applicant is requested to provide layout plans of other existing CBP(s) in Hong Kong to demonstrate that the current proposed facilities, especially for parking and L/UL facilities, are adequate for a typical CBP.	For reference, the layout of the Concrete Batching Plant with 3 production lines located at 100 Tam Kon Shan Road in Tsing Yi ("the Concrete Batching Plant in Tsing Yi") can be found in **Appendix 2** of the revised TIA in ***Appendix I***. A comparison of internal transport facilities between the Proposed Concrete Batching Plant and the Concrete Batching Plant in Tsing Yi is presented in **Table R1** below.

TABLE R1 COMPARISON OF INTERNAL TRANSPORT FACILITIES

Item	The Proposed Concrete Batching Plant (4 production lines)	The Concrete Batching Plant in Tsing Yi (3 production lines)
Car parking space	0	1 [5m (L) x 2.5m(W)]
Waiting space	2 [11m (L) x 3.5m(W)]	2 [9.4m (L) x 3.5m(W)]
Raw material loading/unloading bay	4	1 [9.4m (L) x 3.5m(W)]
Concrete mixer trucks loading point	4	3

Comments	Response
	#1 Car Parking Spaces **Table R1** shows that there is 1 car parking space at the Concrete Batching Plant in Tsing Yi, where there is limited public transport service. Car parking space is not provided for the Proposed Concrete Batching Plant as the Site is in an area well-served by public transport service with numerous franchised bus routes operating along Kwai Chung Road, i.e. some 400m or less than 5 mins' walk away. In addition, the closest entrance to the MTR Kwai Hing Station is some 750m away or within 10 mins' walk away. *#2 Raw material loading/unloading bays* In view that some raw materials are delivered to the Concrete Batching Plant in Tsing Yi by barges, only 1 raw material loading / unloading bay is provided. However, the Proposed Concrete Batching Plant which has no marine access, is required to provide 4 raw material loading / unloading bays to meet its operational needs.
4. Para. 3.3 - The applicant should confirm that the two activities, namely delivery of concrete and delivery of raw materials, will never be carried out simultaneously throughout the day.	Due to limited storage capacity for raw materials, the delivery of raw materials is continuous but varies throughout the day.
5. Table 3.1 - The traffic generation appears to be significantly underestimated, as a typical concrete mix truck in Hong Kong should have a capacity of less than 10m3.	Due to rising cost in the delivery of ready mixed concrete, most, if not all, new concrete mixer trucks have a capacity of $10m^3$. Hence, the capacity of $10m^3$ for each concrete delivery truck has been adopted.
6. Table 3.2 - The waiting space can either accommodate 2 concrete mixer trucks / heavy goods vehicles or 1 articulated vehicle only. Apparently the proposed 2 waiting spaces are not adequate to cope with a traffic generation of over 60 veh/hour. It would	Apart from the 2 waiting spaces, **2 more vehicles** could queue behind the waiting space LP02. In view that the distance between the run-in/out and waiting space LP02 is some 25m, 2 more 11m-long trucks could be accommodated.

Comments	Response
unavoidably force the trucks to wait and queue up on public roads which is unacceptable.	To ensure smooth operation of the Proposed Concrete Batching Plant and to minimise queueing of vehicles on public roads, the following measures are introduced: (i) the control room will monitor the traffic situation in the Proposed Concrete Batching Plant using CCTVs, (ii) GPS tracking units will be installed in the concrete delivery trucks, (iii) a worker is assigned to monitor the real-time delivery of all raw materials, and (iv) a worker will be deployed at the run-in/out to ensure safe entry and exit of vehicles from the Proposed Concrete Batching Plant.
7. According to the swept paths, reverse movements are required for nearly all vehicles operating in the CBP. With high traffic flow during operation, the internal traffic condition is considered unsatisfactory.	Reverse movements within a Proposed Concrete Batching Plant (and within the loading areas of buildings) are not uncommon in Hong Kong. Nevertheless, the reverse movements which are confined within the Proposed Concrete Batching Plant will not affect the public roads.
8. Loading space LP03 is not accessible when either LP01 or LP02 is occupied. Subject to the confirmation that there will be no delivery of materials during delivery of concrete, such an arrangement is not acceptable.	Loading bays LP01 and LP02 are only momentarily used when the concrete delivery truck arrive just before a concrete delivery truck departs from the loading point. Hence, the manoeuvring of the tanker to loading space LP03 is not expected to be hindered.
9. Please supplement the swept path of container / concrete mixer truck entering the premises from Wah Sing Street to LP01.	Please refer to **Figure SP101** of the revised TIA in ***Appendix I.***
10. It is doubtful that a traffic flow of over 60 veh/hour can be achieved owing to various factors such as the cycle time required for loading operation for each concrete mix truck, and the limited capacity of the run-in/out which allows one-way traffic only.	The cycle time required for loading operation for each concrete mixer truck is around 7 minutes, hence, there is a time gap of 6 minutes between the loading of each concrete mixer truck. With 4 production lines, a maximum of 40 concrete mixer trucks, i.e. 60mins/6mins x 4 production lines, is generated per hour. The delivery of raw materials have been reviewed and revised, as shown in **Table 3.1** of the revised TIA in ***Appendix I.*** Therefore, during the peak concrete production

Comments	Response
	(0600-1800 hours), the hourly traffic generation is reduced from 62 to 58 vehicles. It should be noted that the peak concrete production normally occurs at the start of the day, and during lunch, but, not throughout the day. However, to be conservative, peak concrete production is assumed for both the AM and PM peak hours.
11. Para 3.6 - Internal transport facilities should be provided in accordance with HKPSG. In particular, parking facilities should be provided for staff working at the CPB.	According to BD PNAP APP-120, "*the number of personnel in it does not exceed 5 per production line.* Based on this, the Proposed Concrete Batching Plant has maximum of 20 staffs (Calculation: 5 x 4 production lines), which is small. Due to the proximity of public transport services, workers of the Proposed Concrete Batching Plant are expected to commute by public transport services. Hence, no car parking space has been provided.
12. A goods handling platform or area for LP03 should be provided.	A goods handling area for LP03 has been added. Please refer to **Figure 3.1** of the revised TIA in ***Appendix I***.
13. Figure 2.2 - The ingress / egress routes should be provided.	The ingress/egress routes of the Proposed Concrete Batching Plant can be found in **Figure 4.3** of the revised TIA in ***Appendix I***.
14. Figure 4.3 - The further improvement involving a split-phase MOC at J/O Tai Lin Pai Road/Kwai On Road is undesirable as the traffic light signals can easily be blocked by heavy vehicles.	Proposed secondary signal has been added on Tai Lin Pai Road to ensure that right-turn traffic from Kwai On Road to Tai Lin Pai Road can see the traffic signal changing from red to green and will not blocked by heavy vehicles. Please refer to **Figure 4.4** of the revised TIA in ***Appendix I***.

Comments	Response
Email dated 30 December 2024 refers: **Comments from Highways Department:** **(Contact Person: Ms W K NG Tel: 2762 3965)** Please note the following comments on the application from highway maintenance point of view: (i) Para. 3.2 and Figure 3.1 of TIA report – The vehicular access arrangement and run-in/out location and dimension shall be commented by TD. (ii) Figure 3.1 of TIA report – It is noted that the proposed works would affect the road inventory e.g. bollards, lamp post, traffic sign etc. The modification of roadworks due to the development should be approved by TD and subsequently carried out by the applicant to HyD's standard. (iii) Para. 4.9 & 4.10 of TIA report – Any junction improvement works due to the proposed development shall be carried out by applicant. The design of works should be approved by TD and subsequently carried out by the applicant to HyD's standard.	Noted. Noted. Noted.
Email dated 30 December 2024 refers: **Comments from Kwai Chung Division, Hong Kong Police Force:** **(Contact Person: Mr Darren LAM Tel: 3661 2916)** 1. Object to the application with the following main reasons:	

Comments	Response
2. Traffic and Public Safety Risks – The proximity to an industrial area, combined with frequent heavy vehicle movement for transporting raw materials and concrete, presents significant traffic hazards. The busy roads already experience heavy commercial and commuter traffic, and additional vehicle activity could lead to congestion and a higher likelihood of accidents, particularly affecting workers commuting to nearby factories.	The Subject Site falls within an area zoned "Industrial" under the Approved Kwai Chung Outline Zoning Plan No. S/KC/32, where the use of heavy goods vehicles and container trucks are expected. Nevertheless, to ensure smooth operation of the Proposed Concrete Batching Plant and to minimise impact to the vicinity, the operator will adopt the following measures: (i) the control room will monitor the traffic situation in the Proposed Concrete Batching Plant using CCTVs, (ii) GPS tracking units will be installed in the concrete delivery trucks, (iii) a worker is assigned to monitor the real-time delivery of all raw materials, and (iv) a worker will be deployed at the run-in/out to ensure safe entry and exit of vehicles from the Proposed Concrete Batching Plant.
3. Environmental and Health Concerns – Despite no residential in the adjoining lots, dust and noise pollution from concrete production may adversely impact the health and working conditions of local worker. Prolonged exposure to air pollutants in this industrial zone could lead to complaints or disputes, necessitating police intervention to manage potential conflicts.	The Applicant has conducted an Environmental Assessment to demonstrate that the Proposed Concrete Batching Plant would not generate insurmountable adverse environmental impact (***Appendix II*** refers).
4. Emergency Response Concerns – Increased traffic congestion may delay emergency services, such as fire engines and ambulances, in responding to incidents in the area. This delay poses significant risks to worker safety, especially in an area prone to industrial accidents.	The operator will adopt the following measures: (i) the control room will monitor the traffic situation in the Proposed Concrete Batching Plant using CCTVs, (ii) GPS tracking units will be installed in the concrete delivery trucks, (iii) a worker is assigned to monitor the real-time delivery of all raw materials, and (iv) a worker will be deployed at the run-in/out to ensure safe entry and exit of vehicles from the Proposed Concrete Batching Plant in order to minimise potential impact to the vicinity.

Comments	Response
5. Overall, these challenges could complicate policing efforts and render the location less suitable for the proposed operations.	The Applicant will adopt the above measures to minimise the potential impact to the vicinity.
Email dated 30 December 2024 refers: **Comments from Road Management Office, Hong Kong Police Force:** **(Contact Person: Mr Benson TSE / Tel: 3661 1388)**	
1. From road management perspective, the TIA should state whether they have considered the effect of other nearby development projects and whether there is an accumulative effect on the traffic in 2029. Also, the TIA could also mention whether the increase in large trucks generated by the proposed development would have any impact on pedestrians, especially in regards to pedestrian safety at the pavement (ie sufficient railing), junctions, pedestrian crossing, turns, and at the ingress/egress of the concrete plant.	The major planned developments in the vicinity of the Proposed Concrete Batching Plant have been considered as shown in the **Table 4.4** of the TIA in ***Appendix I***. In view that the Subject Site falls within an area zoned "Industrial" under the Approved Kwai Chung Outline Zoning Plan No. S/KC/32, the use of heavy goods vehicles and container trucks are expected. Nevertheless, the following measures are introduced: (i) the control room will monitor the traffic situation in the Proposed Concrete Batching Plant using CCTVs, (ii) GPS tracking units will be installed in the concrete delivery trucks, (iii) a worker is assigned to monitor the real-time delivery of all raw materials, and (iv) a worker in charge of traffic control will be deployed at the run-in/out to ensure safety to pedestrians using the western footpath of Wah Sing Street.
Further comments received on 10 January 2025 While previous comments on the original submission still stand, please mention in the assessment, the method of controlling the ingress/egress of mixer/raw material trucks in and out of the building, so that no queue and traffic congestion occur at Wah Sing Street (the vehicle entrance).	The following measures are introduced: (i) the control room will monitor the traffic situation in the Proposed Concrete Batching Plant using CCTVs, (ii) GPS tracking units will be installed in the concrete delivery trucks, (iii) a worker is assigned to monitor the real-time

Comments	Response
	delivery of all raw materials, and (iv) a worker in charge of traffic control will be deployed at the run-in/out to ensure safety to pedestrians using the western footpath of Wah Sing Street to minimise impact to the vicinity.
Email dated 30 December 2024 refers: **Comments from Environmental Protection Department:** **(Contact Person: Mr David TSANG Tel: 2835 1038)**	
1. Section 3.3.10 of HKPSG Chapter 9 stated that "*siting of dusty uses in main urban areas or near to residential developments should be avoided as far as possible*". It also stated that "*the transportation routes to and from these uses should be designed, and necessary protective measures taken, to minimise dust nuisance*". The applicant should advise how the HKPSG requirements are reflected in the design of the proposed CBP.	Results of air quality assessment with control measures demonstrate that no significant impact would be anticipated.
2. The proposed CBP will operate 24 hours a day and is located about 100m away from the existing residential building, Kwai Ying Building. It is noted that responses to departmental comments (including those environmental observations) given under the pre-application submission are not provided. The applicant has not submitted any Environmental Assessment to support the subject planning application, and most of our previous comments on the pre-application submission have not been addressed in the current application. Based on the limited information available in the application, our technical comments basically similar to those provided for the pre-application submission is attached at **Annex A**.	We have submitted an Environmental Assessment to the Town Planning Board on 30 December 2024. Please also refer to our responses below.

Comments	Response
Please follow up the comments given. **Annex A** General	
1. According to Item K.5, Part I, Schedule 2 of the Environmental Impact Assessment Ordinance, "*a cement works or concrete batching plant with a total silo capacity of more than 10 000 tonnes in which cement is handled and manufactured*" is a Designated Project (DP). Please clarify whether the proposed CBP would constitute a DP or not with justifications.	S.1.2.3 has been added the revised EA to justify that the proposed CBP will not constitute a DP (***Appendix II*** refers).
2. It is noted from Section 3.2 of Supporting Planning Statement that the majority of raw materials will be delivered by specific vehicles, and the produced concrete will be delivered by concrete mixer trucks. Please provide drawings to indicate (i) transportation routes of specific vehicles and concrete mixing trucks when entering and leaving the Site, (ii) mitigation measures particularly for specific vehicles and concrete mixing trucks when entering and leaving the Site, and (iii) the shortest horizontal distance between transportation routes and nearby sensitive receivers. Please advise how the transportation arrangement can minimize dust and noise nuisance to nearby sensitive receivers.	(i) Please refer to Appendix A of the revised EA report for the ingress and egress of vehicles travelling within the proposed CBP. (ii) Wheel washing facilities will be provided for cleaning of concrete mixing trucks before leave of the site. (iii) Distances of sensitive receivers from the site have provided in Table 2-4. Dust impact will be minimised by control measures as shown in Section 2.4.3. Traffic noise impact assessment results show no adverse impact on NSRs. Results of air quality assessment with control measures demonstrate that no significant impact would be anticipated.
3. Noted from Section 3.1.1 of Supporting Planning Statement that "*waste management and wastewater treatment facilities which is to screen the collected surface run-off contaminated by materials in the CBP and other wastewater generated by the operation of the CBP to meet the appropriate standard*" will be provided. Please clarify what is "*waste management facilities".*	As mentioned in **Section 5.3.38** of EA report, the major type of waste generated from the operation of the proposed CBP include cementitious cake, municipal solid waste as well as small amount of chemical waste from the maintenance of the plant equipment. The detailed waste arrangement has been provided in **Section 5.4.11** to **5.4.13** of the revised EA report in ***Appendix II***.

Comments	Response
Air Quality	
4. Please note that for planning applications submitted to the Town Planning Board, the HKPSG Chapter 9 shall be applied to address the potential air quality impacts associated with the proposed development. A **detailed Air Quality Impact Assessment (AQIA)** is required to demonstrate that the proposed development will not cause any adverse air quality impact on nearby air sensitive receivers (ASRs) with fulfilling HKPSG's requirements. If the buffer distance requirements cannot be met, quantitative assessment may be necessary to demonstrate no adverse air quality impact on air sensitive receivers.	Detail air quality impact assessment has been conducted in the revised EA (***Appendix II*** refers).
5. The potential construction air quality impact from the proposed development shall be addressed with more details. The information to be provided shall include but is not limited to: the size of the site formation or excavation area, amount of demolition/excavated materials to be handled, number of construction trucks and mechanical equipment to be used per time over the work site, identification of any concurrent projects within 500 m from the project site boundary and their cumulative air quality impact.	The construction impact assessment has been modified in S.2.4 of the revised EA report (***Appendix II*** refers).
6. Please consider including the following enhanced mitigation measures since there are ASRs in close proximity to the project site:	The following measures have been added accordingly in Section 2.3.8.
(i) Provide electric power supply for on-site machinery as far as practicable and diesel generators and machinery shall be avoided to minimize the gaseous and PM emissions.	Noted. The measure has been added.
(ii) Locate all the dusty activities away from any nearby ASRs as far as practicable.	Noted. The measure has been added.

Comments	Response
(iii) Erect higher hoarding at the locations with ASRs in immediate proximity to the project site boundary.	Noted. The measure has been added.
(iv) Use approved Non-Road Mobile Machinery (NRMMs).	Noted and revised accordingly.
7. It is noted from Section 3.2.1 of Supporting Planning Statement that "each silo should be equipped with a dust collector". Please specify the removal efficiency of the said air pollution control system.	The assumption of removal efficiency of dust collectors can be found in Appendix A of the revised EA report (***Appendix II*** refers).
Noise 8. The application does not contain any noise calculation and plant equipment details. In view of potential lines of sight to the nearby noise sensitive receivers (NSRs) and more stringent noise requirements at night time (2300-0700) for the 24-hour plant operation, **a quantitative Noise Impact Assessment (NIA) should be provided** to demonstrate the compliance of the relevant noise criteria under the HKPSG. The NIA should include operation details (such as number of fixed noise sources, their locations, their expected sound power levels, etc.) and recommendation of suitable noise mitigation measures, where necessary.	Quantitative industrial noise impact assessment has been carried out and shown in **Section 3.4** of the revised EA report (***Appendix II*** refers). Detailed calculations have been included in **Appendix H**.
9. According to Table 4.1 of HKPSG Chapter 9, the planning noise standards for fixed noise sources are 5dB(A) below the appropriate ANL of the IND-TM or the prevailing background noise levels for quiet areas with level 5dB(A) below the ANL. Prevailing background noise measurement is required. Required noise criteria for the proposed fixed noise sources should be determined.	Background noise measurement has been carried out to determine the noise criteria for fixed noise. Section 3.3 has been updated. **Appendices F and G** have also supplemented for the noise measurement data and calibration certificates (***Appendix II*** refers).

Comments	Response
10. The project applicant should confirm if there is any opening, openable window, ventilation intake/exhaust and vehicular exit/entrance etc. on any building facade.	There will be a vehicular exit/entrance at the southeast corner of the Site, connecting to Wah Sing Street. As the opening is shielded by surrounding buildings, no direct line-of-sight is expected from the existing representative NSRs.
11. Heavy vehicles to and from the proposed CBP can cause noise nuisance to nearby residents. The applicant should provide details (e.g. alignment, distance from NSRs, etc.) of the access road to the CBP and examine whether the nearby NSRs would be affected by noise nuisance from additional heavy vehicles for transportation of raw material and concrete driving to and from the proposed CBP along the access road.	Off-site traffic noise impact assessment has been carried out to identify the contribution from the additional traffic flow due to the operation of CBP. The discussion of off-site traffic noise impact assessment has been supplemented in **Section 3.5** of the revised EA report (***Appendix II*** refers).
<u>Water Quality</u> 12. Please conduct a Water Quality Impact Assessment to list out clearly the water quality impact during construction and operational phase and propose mitigations, based on description of construction method and operations of the plant.	A water quality impact assessment has been conducted in Chapter 4 of EA report submitted on 30 December 2024.
<u>Waste Management and Land Contamination</u> 13. Based on our preliminary desktop research, the subject site was previously occupied by an industrial building constructed in the 1970s. The industries and operations that have taken place on the ground floor over time are unknown. Please follow the relevant regulations/circulars/guidelines on waste management and any contaminated land management for proposed development at the subject site.	A land contamination review has been conducted in Chapter 6 of EA report submitted on 30 December 2024.

Comments	Response
SIA (in Appendix III) 14. Section 1.1.1 – According to Section 2.1.2 of the Planning Statement, the building at the subject site has already been demolished. Please revise Section 1.1.1 accordingly.	Noted. Section 1.1.1 has been revised accordingly (***Appendix V*** refers).
15. Section 2.2.2 Figure 2-1 – Please revise the term 'drainage pipe manhole facilities' to 'sewerage pipe manhole facilities' to avoid confusion.	Noted and relevant text and figures have been revised accordingly (***Appendix V*** refers).
16. Appendix A – Please provide the source of information in 'Details of Catchments'.	"Details of Catchments" was the best available information obtained from directory of the buildings during the site visit and building information from website. A remark has been supplemented below the "Details of Catchments" table in Appendix A (***Appendix V*** refers).
17. Please be reminded that the implementation of local sewer connection / upgrading / diversion works shall meet the satisfaction of DSD. The applicant shall seek DSD's view on the SIA report.	Noted.
Email dated 30 December 2024 refers: **Comments from Drainage Services Department:** **(Contact Person: Ms Winnie CHEUNG Tel: 2300 1587)**	
1. Figure 2.1 – The pipe section from the proposed terminal manhole to the Manhole FMH4021330 should also be shown in the figure.	Noted. The proposed pipe section has been indicated in **Figure 2.1** (***Appendix V*** refers).
2. Appendix B – Please provide the source of information for the assumed no. of staff for other catchments.	The staff number was estimated using the floor area of the building and relevant worker density. Please refer to the remark column for details.

Comments	Response
3. Appendix B – Use of peaking factors was missing.	Peaking factor (P) has been considered in the calculation of flow capacity in **Appendix C**.
4. Appendix C – Tables showing before and after the proposed development should be provided to review the impact.	Noted. The calculation of flow capacity has been separated into "before" and "after" scenarios in **Appendix C**.
5. Appendix C – The hydraulic assessment on pipe section from the proposed terminal manhole to the Manhole FMH4021330 should also be included in the table with the proposed development.	Noted. The hydraulic assessment on the proposed pipe section from the terminal manhole to Manhole FMH4021330 has been demonstrated in "After" scenario in **Appendix C**.
6. Appendix C – Please note that the pipe materials should also be mentioned in the assessment.	For conservative approach, the roughness value for concrete pipe material has been adopted. The assumed pipe material has been supplemented in Note 2 of **Appendix C**.
Email dated 30 December 2024 refers: **Comments from Buildings Department:** **(Contact Person: Mr WONG Ka-Kui, KK Tel: 2626 1428)**	
1. Maximum plot ratio and site coverage for the proposed development shall comply with the 1st Schedule of Building (Planning) Regulations;	Noted.
2. Requirements for sustainable building design guidelines as stipulated in the PNAP APP-152 should be complied with in case the attribute of gross floor area (GFA) concessions under the PNAP APP-151 is applied;	Noted.

Comments	Response
3. Justification for the storey higher than 5m is required for our consideration at building plan submission stage; and	Noted, justifications will be provided at GBP submission stage.
4. Detailed comments under the BO will be given at building plan submission stage.	Noted.
Email dated 30 December 2024 refers: **Comments from Fire Services Department:** **(Contact Person: Mr LAU Chun-kit Tel: 3971 4681)** 1. Detailed fire safety requirements will be formulated upon receipt of a formal submission to STT/STW, general building plans or referral of application via relevant licensing authority. Furthermore, the EVA provision in the captioned work shall comply with the standard as stipulated in Section 6, Part D of the Code of Practice for Fire Safety in Buildings 2011, which is administered by the Buildings Department.	Noted.
Email dated 30 December 2024 refers: **Comments from Kwai Tsing District Office:** **(Contact Person: Mr Percy LIU Tel: 2489 1083)** 1. Though we understand that public consultation is being conducted, the applicant is recommended to consult the views from the Kwai Tsing District Council, Kwai Chung Central and South Area Committee and other possible affected parties and stakeholders	Noted.

Comments	Response
prior to implementation.	
Email dated 30 December 2024 refers: **Comments from Tsuen Wan and West Kowloon District Planning Office, Planning Department:** **(Contact Person: Mr Sam HO or Mr Norris CHUNG Tel: 2417 6258 or 2417 6252)** 1. Section 4 (Planning Merits and Justifications) – (a) In addition to the strategic locational consideration for transportation, please provide further details on the locational considerations for site selection and the land use compatibility of the proposed concrete batching plant with the surrounding environment; and (b) While it is stated that there will be no adverse traffic and sewerage impacts based on the findings of the technical assessments, please advise whether environmental considerations – such as noise, air quality, waste and land contamination aspects – have been taken into account, and update the relevant paragraph(s) as appropriate.	Section 4 has been updated. Please refer to the replacement pages of the Supporting Planning Statement in ***Appendix III***. Section 4 has been updated. Please refer to the replacement pages of the Supporting Planning Statement in ***Appendix III***.
Email dated 30 December 2024 refers: **Comments from Urban Design & Landscape Section, Planning Department:** **(Contact Person: Ms Charlotte KO Tel: 3565 3946)**	

Comments	Response
1. Discrepancy in the width of setback along Wah Sing Street in para. 3.1.3 (1.5 to 2.7m), para. 4.4.1 (1.5m to 4.2m) and Drawing No. SW-KC-CBP-GP-02 (1.59m to 2.7m) is observed. Please ensure consistency.	The relevant annotations have been updated. Please refer to the updated drawing in ***Appendix IV***.

Consolidated by: **KTA Planning Limited**

Date: **27 January 2025**

List of Appendices

Appendix I Revised Traffic Impact Assessment

Appendix II Revised Environmental Assessment

Appendix III Replacement Pages to the Supporting Planning Statement

Appendix IV Updated Architectural Drawings

Appendix V Revised Sewerage Impact Assessment