PLANNING LIMITED
規劃顧問有限公司

UNIT K, 16/F, MG TOWER
133 HOI BUN ROAD, KWUN TONG
KOWLOON, HONG KONG
九龍觀塘海濱道133號
萬兆豐中心16樓K室
電話TEL (852) 3426 8451
傳真FAX (852) 3426 9737
電郵EMAIL kta@ktaplanning.com

By Email and Hand

Our Ref: S3020b/13WSS_KC/23/008Lg

24 March 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. 3

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 February 2025.

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 Environmental Assessment
Appendix II Revised Traffic 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 27 January 2025 refers: **Comments from Environmental Protection Department:** Further Information 1 - Environmental Assessment (EA) **General**	
1. Noted from Drawing No. SW-KC-CBP-GP-01 under Appendix A that the concrete mixer trucks and raw material deliver trucks will drive in and out the application site. Please advise how the off-site transportation arrangement can minimize the potential environmental nuisance to nearby sensitive receivers.	The concrete mixer trucks and raw material deliver trucks will have the wheel washed before leaving the proposed plant to minimise the impact. The content of raw material deliver track will be covered to minimise the release of fugitive dust. As per the predicted assessment results, the environmental impact of offsite traffic is minimal.
2. Please deliver a CD-ROM to the EPD's office direct for the upcoming submission(s), providing both the highlighted and clean versions of the EA report, along with all calculation spreadsheets and modeling files for easy review.	Noted
3. Should you require any clarification on the comments or observations, please direct contact our specialists as listed below.	Noted

Aspect	**Name**	**Tel.**
Air Quality	Dr. Hilda HUANG	2835 1154
Noise	Ms. Selena YANG	2835 1277
Waste & Land Contamination	Ms. Crystal CHUNG	2835 1296
Water Quality	Dr. Patrick KAO	2594 6152

Comments	Response
Air Quality	
4. Section 2.2.2 and Table 2-1 - Please note that the new Air Quality Objectives (AQOs) are tentatively scheduled for implementation in early 2025. If the project is finalized after these AQOs are implemented, it will need to comply with the new standards for assessment.	Noted. The 2025 AQOs have also been considered in the assessment and results are compared in details in Appendix E (*Appendix I* refers).
5. Section 2.2.3 - Please revise "dust abatement" to "air quality control" in line 2 and "dust" in line 3 to "air".	Relevant text has been revised accordingly.
6. Section 2.2.4 - Please revise dust control and suppression" in lines 3-4 to "air quality control".	Relevant text has been revised accordingly.
7. Section 2.3.3 - Please clarify whether there are any concurrent projects within the 500 m assessment area, as the definition of "major" is ambiguous. In addition, please carry out site survey to verify if there is any on-going project within the 500 m assessment area since the proposed project will commence the construction works in 2025.	Section 2.3.3 has been revised with more information. No concurrent and ongoing project has been identified.
8. Section 2.3.4 – A. Please add "PM" after "SO2" in line 1. Please provide the maximum number of PMEs to be used simultaneously over the work site to justify that the number is small.	The max no. of PMEs have been provided in Section 2.3.5.
B. Please clarify if the ETWB-TC(W) is applicable to this proposed project if it is not a government project.	ETWB-TC(W) has been deleted.

Comments	Response
C. Please provide the maximum number of construction trucks operating simultaneously over the work site and address their potential air quality impacts.	The number of construction trucks has been provided in Section 2.3.6 (*Appendix I* refers).
D. Please clarify if the ETWB-TC(W) is applicable to this proposed project if it is not a government project.	ETWB-TC(W) has been removed.
9. Section 2.3.7 - Please add "Dust" after "Construction" in line 1. Please revise "dust control" in line 1 to "air quality control."	Relevant text has been revised accordingly.
10. Section 2.3.8 - Please remove ", except those exempted" and "or exempted" in the last two bullet points.	Relevant text has been removed accordingly.
11. Section 2.3.9 -	
A. The second bullet point, please revise "dust nuisance and smoke" to "air nuisance".	Relevant text has been revised accordingly.
B. The fourth bullet point, please revise "dust" in line 2 to "air quality".	Relevant text has been revised accordingly.
12. Section 2.4.1 - Please provide a more detailed definition of "normal operation" and include a brief description of the arrangements during abnormal operation, e.g., whether diesel generators will be used, the contingency plan and relevant mitigation measures.	Similar to most of the concrete batching plants in Hong Kong, all the equipment of this plant will only be driven by the electricity mains for concrete production. Diesel generator of no more than 5MW will only be used for emergency situations such as fire. To avoid misunderstanding, "normal operation" has been replaced by "concrete production". Please also refer to the revised para. 2.4.1 of the revised EA in *Appendix I* for details.

Comments	Response
13. Table 2-3 - A. The operation hours presented in the table are different from those in Table 3.1 of the Traffic Impact Assessment. Please verify.	Table 3.1 has been revised.
B. Please note that if the actual operating hours differ from those listed in Table 2-3, it is necessary to consider the worst-case scenario. If not, the assessment results may be invalid due to changes in operating hours	The operating hours have been revised according to worst-case scenario.
C. Please clarify why the emission point EP21, which represents the vehicles travelling within the CBP and on open roads, is considered a point source in Figure 2-1, or EP21 represents the emission point from the dust collector for aggregate transfer. Please also note that there is no "EP21" in the emission calculations presented in Appendix A. Please review.	Vehicle emission within the CBP will be released through EP9 as the CBP will be enclosed and the opening will be negative pressured. Calculation EP9 is included in Appendix A (*Appendix I* refers).
14. Table 2-4 and Figure 2-2 - The Castle Peak Road Kwai Chung Sitting-out Area should be included as one of the representative ASRs.	This ASR has been added as ASR12. Table 2-4 and Figure 2-2 have been amended accordingly (*Appendix I* refers).
15. Table 2-4 - Please include a column to indicate the assessment height range for each ASR and add a table note to clarify that the full range of the assessment heights for each representative ASR has been covered.	Relevant text has been amended accordingly.
16. Section 2.4.3 - Please specify the removal efficiency of the air pollution control equipment/dust collector.	Relevant text has been added in point 10 of the section.

Comments	Response
17. Section 2.5.1 and hereinafter - Please indicate the version of SAMP in the report.	The version of SAMP has added to the revised EA report.
18. Section 2.5.2 - The meaning of the second sentence is unclear. Please check if the PATH background concentrations in 2025 are still available. If affirmative, please revise as "The concentrations in 2025 predicted by PATH v3.0 are adopted as the future background concentrations in the assessment for this Project". Otherwise, please adopt PATH background concentrations in Year 2026 since the proposed project will commission in Year 2026.	Background of Year 2026 has been adopted. The section has been revised (*Appendix I* refers).
19. Section 2.5.6 - The endorsement of the traffic data should be obtained from the Transport Department and included as an appendix in the report.	The endorsement of the traffic data from TD is pending and will be provided once available.
20. Section 2.5.9 - Please revise "assessment" in the last line to "estimations".	Relevant text has been revised accordingly.
21. Section 2.5.10 – A. Please revise "within" in line 1 to "from", as start emissions may spread over a certain distance and are not confined to the interior of the termini. In addition to the PTIs/bus terminus, please confirm whether there are any HGV and coach parking sites and bus depots within 500 m from the project site boundary.	Line 1 has been revised accordingly. Six HGV/coach parking sites were identified within 500m from the project site boundary but were small in scale. Broad bush approach with start emission has been included in the assessment for these parking sites. Justification has been added in Section 2.5.9 of the revised EA report.
B. Please clarify whether the Kwai Hing and Shek Lei bus termini have forced mechanical ventilation. If affirmative, please elaborate how the emissions are distributed via the opening/ingress/egress/exhaust.	Based on the site visit, Kwai Hing and Shek Lei bus termini are equipped with mechanical ventilation. The model assessment assumed emission within the termini as volume sources and disturbed equally between the volume sources. The clarification has been added in the

Comments	Response
	section.
22. Section 2.5.11 - A. Please clarify whether site surveys have been conducted and the specific dates should be provided. Please be reminded that the applicant and their consultants are responsible for verifying the accuracy of the chimney data by their own site surveys. If the information regarding the industrial chimneys is later discovered to be incorrect, the assessment results presented in the planning application will be considered invalid	Stie survey had been conducted, and no active chimney had been identified within 500m from site boundary. This section has been revised accordingly.
B. Kwai Chung and Fu Shan Crematoria are two major point sources within 4 km of the Project site. Please revise the last sentence and review whether these sources would have direct impacts on the Project site and should be included in the assessment.	The last sentence has been revised.
23. Section 2.5.14 - Please add "predicted" before "initial" in the definition of [NOx]ind.	Relevant text has been revised added accordingly.
24. Section 2.5.15 - Please note that the North District AQMS is not the closest station. Please revise accordingly.	Note that Kwai Chung station as the closest station, relevant text has been revised accordingly.
25. Section 2.6.2 - Please show the contour plots of the air pollutants at the worst hit level.	Contour plots at the worst hit levels have been included.
26. Section 7.1.4 - Please delete "and meet the SIL during the operation phase".	Relevant text has been deleted accordingly.

Comments	Response
27. Appendix A, PDF P.58 -	
A. Please verify the operation periods as they are not consistent with the information provided in the Traffic Impact Assessment.	The proposed plant operates 24 hours daily, but the traffic impact assessment has been conducted for the AM and PM peak hours.
B. Please provide the reference sources for the parameters in each column.	Relevant reference sources have been revised accordingly.
C. Please clarify if DC-21 shall be separated into 2 parts, one point source for aggregate transfer and area source for "paved road", or the emissions from the paved roads are also collected by dust collector.	DC21 will be used to filtered dust through extracted emission from both aggregate receiving hoppers and paved roads.
28. Appendix A, PDF P.59 -	
A. Note 2, please clarify which Appendix A is referred to.	The catalogue shows the control efficiency of dust collector has been included in Appendix A of the revised EA report in *Appendix I*.
B. Please provide the reference sources for the control efficiency (99.99%), the total concrete production rate (100 m3/hr/leg) and the density (2.4 tonne/m3).	The reference information has been provided.
C. Note 8, please provide reference sources or/and supporting evidence to justify that the figures adopted (100 tonne/hour/leg and 200 tonne/hour/leg) can represent the worst-case scenario.	The maximum figures have been estimated and provided by the engineer of the project as Note 1.
D. Note 9, please review and clarify whether the general factors (0.286 kg/Mg and 0.078 kg/Mg), which are the arithmetic mean of all test data, could represent the worst-case scenario, or the emission factor for mixer loading (central mix) should be calculated using Eqn 11.12-1.	Eqn 11.12-1 has been adopted for the calculation of emission rate from mixer.

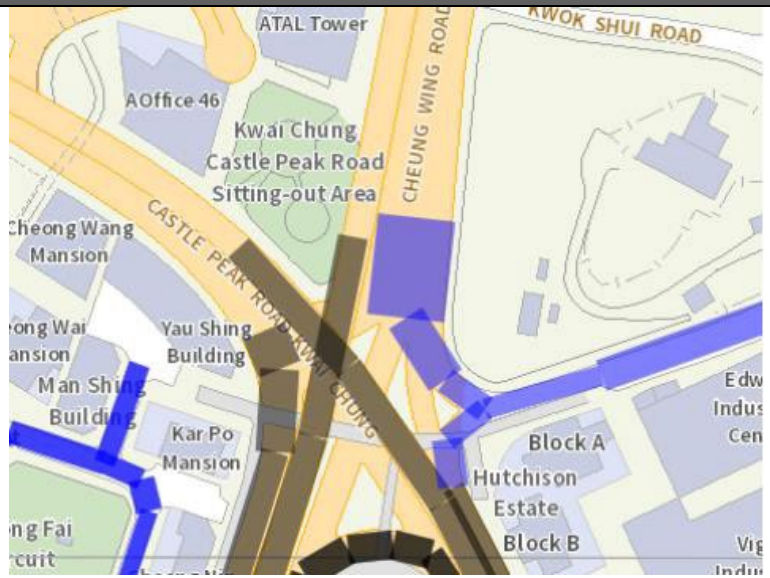
Comments	Response
E. Please add a note to clarify the relationship between "leg" and "mixer".	The clarification has been included in Note 12.
F. Please verify whether the predicted TSP concentrations at DC17 to DC20 exceed the BPM limit (10 mg/m3).	The TSP concentrations at DC1 to DC20 are within 10 mg/m^3. This has been shown in the calculation.
G. Please provide the total number of silo for the proposed project and clarify if the dust collector capacity of 3000 m3/hr represents 1 dust collector or 16 dust collectors. Same comments are applied to the dust collector with a capacity of 1500 m3/hr.	There will be 16 silos and each with a dust collector with a capacity of 3000m^3/hr. Hence, there will be 16 dust collectors in total for silos and every 4 dust collectors will be released to ambient through as single exhaust. There will be totally 4 exhaust points for 16 dust collectors for silos. There will be 4 dust collectors with capacity of 1500m^3/hr for each of the mixer with holding hopper.
H. The calculations are very confusing. Please clarify the use of the dust collector capacity of 3000 m3/hr and 1500 m3/hr, and the concentrations of 20.8 mg/m3 and 8.3 mg/m3. There are emission rates for the holding hoppers (EP17 to EP20) on PDF P.59 and emission rates for EP17 for unloading of aggregates to aggregate receiving hoppers on PDF P.60. Please clarify if they are different emission sources.	The capacities of dust collectors were provided by the project engineer. Note has been included. The concentrations have been revised. The appendix has been revised for clearer clarification.
29. Appendix A, PDF P.60 - A. The calculations on PDF P.60 are very confusing and it is necessary to tidy up the calculations in a proper order with detailed remarks.	The calculation and the order have been revised and tidy up (*Appendix I* refers).
B. Please clarify whether the "unloading of aggregates to aggregate receiving hoppers" only occurs at EP17.	Ditto

Comments	Response
C. Please indicate the reference sources for the uncontrolled TSP and RSP emission factor (aggregate). Please also note that the emission factors for "Aggregate transfer" listed in Table 11.12-1 were derived under several assumptions (refer to Note b). Please review whether those assumptions can be applied to this Project, or consider calculating the emission factors by equations in AP-42 Section 13.2.4.	Noted and added. The emission factors as Table 11.12-1 of AP42 have been adopted for the assessment since the factors are based on the equation in Section 13.2.4 and the aggregate transfer will be taken within enclosed area. The wind speed adopted in Note b is 10mph, the wind speed inside will be much lower and the emission factors as provided in Table 11.12-1 is considered more conservative.
D. Please clarify the meaning of "Unmitigated Total TSP/RSP/FSP Emission Rate from EP5".	The terms have been revised.
E. Please show the detailed calculations of "Mitigated TSP/RSP/FSP Emission Rate' and "Mitigated TSP/RSP/FSP Emission Rate of Dust Collector".	The calculation of emission rate of the dust collector has been revised in more details.
F. Note 3, as the assessment in the approved EIA report was conducted over a decade ago, please review whether there is any updated data or information that would be more appropriate for use in this project.	Refer to an approved Section 16 planning for concrete batching plant (Application No. A/NE-TKL/728), the control efficiency is also referring to the approved EIA report but with conservative assumption at 90%. However, the proposed aggregate receiving for the Project is within an enclosed building with low wind speed comparing to outdoor hopper. Therefore, 95% control efficiency is considered as appropriate.
G. Please provide the reference sources for "RSP/FSP Emission Factor (controlled) of paved road".	Reference sources have been provided.
H. Please review if the statement "Mitigated Measures: Dust collector DC 18" is correct, since the information is inconsistent with those in Table 2-3.	This has been revised as DC21.
I. Please review whether "V15" should be removed.	Relevant text has been removed accordingly.

Comments	Response
30. Appendix A, PDF P. 61, 84 and 85 - The segments EP24_10 and EP24_13 are different links for concrete mixer trucks and raw material deliver trucks. Please verify.	The figure of traffic flows inside of the plant has been revised. Road segments EP24_10 and EP24_13 are the same links for concrete mixer trucks and raw material trucks.
31. Appendix A, PDF P.61 - A. The maximum hourly traffic density is not consistent with those presented in Table 3.1 of the Traffic Impact Assessment. Please verify.	Traffic density has been revised according to the TIA.
B. Please state clearly that the calculations of the emission factors are referred to PDF P.62.	Relevant text has been revised with title to state the calculation.
C. Please note the emission factors are different from those shown on PDF P.62-75 with different measurement units.	The units have been revised.
32. Appendix A, PDF P.62 - A. Please remove the title in line 1.	Relevant text has been removed accordingly.
B. Please indicate the reference sources for "Average Loaded Weight of Truck", "Average Unladden Weight of Trucks" and "Average Weight of Truck".	The project engineer provided these data and a note has been added.
C. Please state clearly that the calculations of the dust mitigation efficiencies are referred to PDF P.76.	This has been stated in Note 4 in the revised sheet.
33. Appendix A, PDF P.75 - Note 3 is incomplete. Please review.	This has been revised as Note 4
34. Appendix A, PDF P.76 - A. The notes are missing. Please supplement.	The Notes have been added.

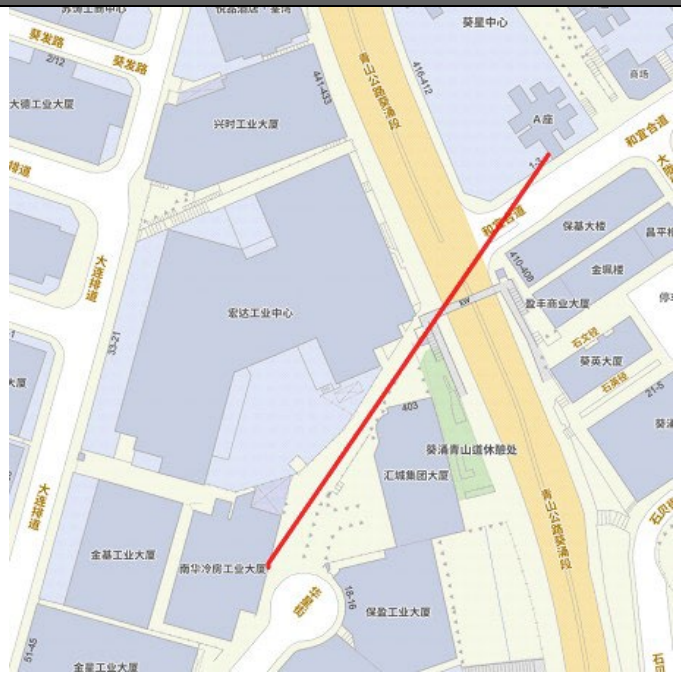
Comments	Response
B. Please clarify whether the second column of the table is "average" or "maximum" hourly traffic and whether there should be another column presenting the traffic at nighttime.	Revised as "Max",
C. Please indicate the reference sources for the application intensity i and watering frequency t.	Note 4 has been added to indicate the source.
D. Please state clearly in the relevant section that watering every hour shall be applied for minimizing the dust emission.	Recommendation of watering frequency of once every hour has been added in point 13 of Section 2.4.3.
35. Appendix A, PDF P.77-81 - A. Please provide the reference sources for the temperature and RH adopted for estimating start emission factors.	Reference has been provided based on data from PATH grid (36,38).
B. Please remove the remarks and specify whether the start emission data on these pages are used for start emission calculations for the trucks within the proposed development.	The remarks have been removed. The start emission data have been stated as adopted in the note of the calculation of Vehicle Tailpipe Emission
36. Appendix A, PDF P.82 and 83 - A. Please review whether "Traffic Density of the Ping Che CBP" in the title should be removed.	Relevant text has been removed accordingly.
B. Please indicate the reference sources or justifications for assuming the soak- time for vehicle trip starts being 10 min.	The reference source has been included in the note.
C. Please clarify whether there are idling emissions for the trucks within the proposed development.	No idling would be expected. Note has been added.

Comments	Response
37. Appendix C, PDF P.92: A. TD's endorsement on the traffic data should be provided.	TD endorsement is pending and will be provided once available.
B. The Annual Traffic Census 2023 is available now and please ensure the most updated data is used for emission calculations.	Noted. the latest traffic data has been adopted as advised by traffic consultant.
C. "Trips", please include one or two sentences to clarify why start emissions were not assumed for Kwai Chung Road and Castle Peak Road. Please also state clearly whether start emissions were estimated for all 18 types of vehicles.	Clarification has been added.
38. Appendix C-1, PDF P.94 - A. Please display road links with and without start emissions in different colors in Figure C-1.	Figure C-1 has been revised to show the roads with start emissions.
B. Please review whether the following roads should be included in the assessment: Tai Wo Hau Road bypass near Kwai Chung San Kui Park, Slip Roads between Kwai Yik Road and Kwai Chung Road, bypass roads near Castle Peak Road and Cheung Wang Road shown in the figure below.	Those roads have been included in the revised assessment.

Comments	Response
	
39. Appendix D - A. Please include a map indicating the locations of all the termini and taxi stands within the 500 m assessment area.	The figure has been included to show all the termini and taxi stands in Appendix D.
B. PDF P.180-181, in addition to the termini and taxi stands, please confirm whether there are any HGV and coach parking sites and bus depots within 500 m from the Project site boundary.	Six HGV/coach parking sites were identified within 500m from the project site boundary, but these were small in scale. Borad bush approach with start emission is included in the assessment for these parking sites. Justification has been added in Section 2.5.9 (*Appendix I* refers).
C. Since Kwai Hing Station Bus terminus and Shek Lei bus terminus are semi- confined, please provide the distribution of emissions via the opening/ingress/egress/exhaust point if there	Based on the site visit, Kwai Hing and Shek Lei bus termini are equipped with mechanical ventilation. The model assessment assumed emission within the termini as volume sources and disturbed equally

Comments	Response
is forced ventilation.	between the volume sources. The clarification has been added in Section 2.5.10.
D. PDF P.182 -186, please remove the remark. Please clarify which set of RH and temperature data are adopted for calculations of vehicular emissions for the 3 termini.	The remark has been removed. Note for RH and temperature has been added.
E. PDF P.188 - 226, please clarify if the site survey was conducted on a normal working day and specify when the survey was conducted on the relevant pages.	Site survey was conducted on normal working days. Dates of survey have been included.
40. Appendix E -	
A. Since the assessment heights for several ASRs do not start from 1.5 mAG, please provide supporting evidence to demonstrate that there are no air- sensitive uses below the minimum assessment heights listed in the table.	A note has been added.
B. Contour plots should be provided for the worst-affected levels of each air pollutant to demonstrate that all ASRs within the 500 m assessment area are not subject to adverse air quality impacts.	Contour plots at worst affected levels have been presented in Appendix E of the revised EA in *Appendix I*.
C. Please clarify why the assessment results are not presented for full range of assessment heights for each ASR (e.g. ASR1 are assessed at 11.5 mAG, 18.5 mAG and 93.5 mAG only).	A Note has been added.
41. Please update the air quality models based on the above comments	Noted.

Comments	Response
Noise *Major Comments* 42. Section 1.2.2 - Please clarify whether the maximum hourly production rate of 480 m^3/hour for the Proposed CBP applies to the entire CBP or just to a single production line.	Please be advised that the maximum hourly production rate of 480 m^3/hour applies to the entire CBP.
43. Section 3.4.1 – Noted from Appendix H that the operation time of 5 mins and the 16.7% on time have been assumed for Loader and Concrete Truck (Concrete Collection). Please review if these assumptions are practical in completing the works, since idling truck shall be also considered.	As a conservative approach, operation time of 30 mins and 100% on time have been assumed for Loader and Concrete Truck.
44. Section 3.5 – Please indicate the induced traffic flow from the proposed development.	Approximate induced traffic has been included in Section 3.5.
45. Section 3.4.7 Selection of NSR – With reference to the GeoInfo Map captured below, Po Kai Mansion and Kwai Sing Center Block A may have line of sight to the proposed development, please include the representative NSRs for assessment.	Kwai Sing Centre has been included as a representative NSR for assessment. Tables 3-4 to 3-6, Figure 3-1 and Appendix H have been revised accordingly.

Comments	Response
	
46. Section 3.4.8 Fixed Noise Assessment – Noted that "acoustic enclosure or silencer will be provided for the rooftop Mechanical and Electrical ("M&E") Equipment, such as cooling tower or chiller plants", please include the rooftop equipment into the quantitative fixed noise assessment.	The rooftop chiller has been considered in the fixed noise assessment. As no detailed inventory/ model catalogue is available at current stage, the maximum allowable sound power level has been determined for the chiller.
47. Section 3.5.2 Traffic Data – Noted that traffic data in Year 2041 and AM peak were selected for assessment. Please elaborate on why the Year 2041 and the AM peak were selected, and provide the source of the traffic data. TD endorsement on the traffic forecast data shall be provided to support the traffic noise impact	Offsite traffic noise impact assessment has been done qualitatively. Section 3.5 has been revised.

Comments	Response
assessment.	
Minor Comments	
48. Please clarify in EA whether the Concrete Collection Areas are also fully enclosed.	The concrete collection area will be fully enclosed. This has been supplemented in Section 3.4.7 accordingly.
49. Please state the commencement year of 2026 in this chapter.	The commencement year of 2026 has been included in Section 3.4.1.
50. Please indicate in the EA whether the traffic data is provided by traffic consultant.	Noted. Section 3.5.1 has been updated to indicate the traffic forecast data is provided by traffic consultant.
51. Observations on the Traffic Noise Assessment and Model are provided in a separate file.	Noted.
Water Quality	
52. Please note that ProPECC PN 2/24 have been issued to supersede the ProPECC PN 2/23. Please update the relevant sections in the EA.	Noted and the relevant text has been revised accordingly.
53. Section 4.3.1 - Please specify which phase the Victoria WCZ is in.	The Site is situated in Victoria Harbour WCZ (Phase 1). S4.3.1 has been updated accordingly.
54. Section 4.3.3 – Please include the sewage generated from construction workers as one of the pollution sources.	The description has been included in the 2nd sentence in S4.3.3.
55. Section 4.4.2 – Please move the wheel-washing measure (stated in the last bullet) up to the first bullet. Please emphasize that the vehicles leaving the plant should be washed such that there will be no debris leaving on the road outside and causing runoff pollution	The description of wheel washing has been moved to the 1st bullet point. All vehicles and plants leaving the Site will be washed thoroughly to ensure that no earth, mud, debris and the like is deposited by them on the public roads.

Comments	Response
after rain.	
56. Sections 4.4.5 & 4.5.3 – Please clarify in the main text that SIA has been carried out, and summarize the findings and conclusion of the SIA.	Noted. S4.4.5 has been updated to include the conclusion of SIA.
57. We noted the title of Figure 4-1 (WSR figure) has been revised under FI2 submission, while the figure itself appears to be same as that in the 1st Further Information (FI1). Please holistically elaborate what revision was made in the WSR figure, together with FI1's comments above.	Comparing with Figure 4-1 in FI1, the legend of Figure 4-1 in FI2 has been updated for better presentation.
Waste Management and Land Contamination 58. Section 1.3.1 (point 1) – In additional to operation phase, please review if the potential environmental impacts arising from construction phase of the proposed development is included.	The potential environmental impact arising from both construction and operation phase of the Proposed CBP has been assessed in this EA report. S1.3.1 has been updated accordingly.
59. Section 5.2.1 – A. Please revise "KOng" as "Kong".	Noted and the typos has been revised accordingly.
B. The requirements of the circular ETWB TC(W) No. 19/2005 shall be applicable to public works contracts, while ADV-19 shall be applicable for private project. Please review which one (i.e. either one) shall be applicable to the proposed development.	The proposed CBP is a private project. ADV-19 should be applicable to this project. ETWB TC(W) No. 19/2005 has been omitted from S5.2.1.
60. Section 5.3 - The Monitoring of Solid Waste in Hong Kong 2023 has been published. Please quote the latest version of the report and update the quantity estimation based on the latest figures.	The statistics have been updated accordingly.

Comments	Response
61. Section 5.3.9 – Please clarify how the 10,500m2 figure is derived.	As a conservative approach, the GFA is derived from the site area multiple the number of storeys, (i.e. 1,780m^2 x 6). S5.3.9 has been updated accordingly. This is a conservative approach and will be different from the calculation by BD.
62. Section 5.3.13 – Please clarify if the surplus inert C&D materials of this project will be sent to both Tuen Mun Area 38 and TKO Area 137 Fill Banks or either one only.	The surplus inert C&D materials of this project will be sent to public fill reception facilities, such as Tuen Mun Area 38 Fill Bank and Tseung Kwan O Area 137 Fill Bank, subject to detailed arrangements in the later stage. S5.3.13 has been updated accordingly.
63. Section 5.3.14 and relevant sections - For consistency, please replace the terms "public filing facilities" & "public filling reception facilities" with "**public fill reception facilities**". Please review and update the relevant sections.	The term "public fill reception facilities" has been adopted in the report for consistency.
64. Sections 5.3.21 to 5.3.23 - The terms "C&D Waste", "non-inert C&D waste" and "non-inert C&D materials" are adopted in the sections. For better clarity and consistency, it is suggested to use the consistent term "non-inert C&D materials". Please update.	The term "non-inert C&D materials" has been adopted in the report for consistency.
65. Section 5.3.24 – Please remove the phrase "Considering the above estimation".	Noted and revised accordingly.
66. Section 5.3.25 – Please elaborate what kinds of packaging and organic material refer to.	It refers to the food package, disposable lunch boxes food leftovers etc. Section 5.3.25 has been revised for clarification.
67. Table 5-2 – For inert C&D materials, please clarify if treatment options 1& 2 are the same.	Please note that Option 1 is on-site reuse/recycle, while Option 2 is off-site reuse/recycle.

Comments	Response
68. Section 5.3.43 - Please clarify if any treatment (e.g. dewatering) will be required before sending the cementitious cake to the PFRFs.	Please note that the cementitious cake is generated from the sediments after dewatering process. The operator will ensure the cementitious cake complying with the content requirement of public fill reception facilities.
69. Section 5.4.5 – Please review whether "public fill" should be read as "**public fill reception facilities"**.	Noted and revised accordingly.
70. Section 5.4.9 – Point 11 is similar to Point 1. Please remove Point 11.	Point 11 has been removed from S 5.4.9.
71. Section 5.4.13 – Please supplement whether CWP registration and the guidelines outlined in the Code of Practice on the Packaging, Labelling, and Storage of Chemical Wastes apply during the operational phase.	Noted. S 5.4.13 has been revised to include the CWP registration and Code of Practice on the Packaging, Labelling, and Storage of Chemical Wastes.
72. Section 5.5.2 – Please supplement the conclusion for chemical waste.	The conclusion for chemical waste has been included in S 5.5.2.
73. Sections 5.5.2 & 7.1.12 - The two parts of the last sentence seem to lack a clear causal relationship. Please review and revise it.	S 5.5.2 and 7.1.12 have been updated for better presentation.
74. Section 6.4.1 – Please clarify if a separate submission of land contamination assessment covering the findings of site walkover and site appraisal will be submitted to EPD for agreement.	Site visit has been conducted on 10 March 2025. The findings of site walkover and site appraisal have been supplemented in S 6.3.3.
75. Section 7.1.14 (last sentence) – Apart from historical use, existing use of the building shall be included in the assessment.	S 7.1.4 has been updated accordingly.

Comments	Response
Email dated 03 February 2025 refers: **Comments from Environmental Protection Department:** **(Contact Person: Mr David TSANG Tel: 2835 1038)** **Air Quality**	
1. Section 2.6.2 - According to Table 2-6, annual average FSP concentrations were predicted to be higher than 15 μg/m3 at ASR6. Therefore, it is not justified to claim that there will be no exceedance of the proposed 2025 AQOs. Please review.	Table 2-6 has been updated. There is no exceedance of the proposed 2025 AQOs.
2. Appendices C and D - All source IDs should be presented clearly on the figures.	Figures in Appendix D and Figure C-1 has been revised accordingly (*Appendix I* refers).
3. Appendix C-2 - Please present the vehicle emission rates in g/s/m2 for Jan to Dec (instead of annual only) for checking.	The vehicle emission rate for Jan to Dec has been incorporated into Append C-2.
4. Please improve the resolution of the figures in the report (e.g. Figure 2.2 and Figure C-1).	Figure 2-2 and Figure C-1 has been updated accordingly.
5. Please verify and confirm whether 2025 or 2026 PATH background concentrations were used in the assessment.	2026 PATH background concentrations have been used.
6. The land-use parameters (Albedo, Bowen Ratio, Surface Roughness) adopted in AERMET do not match the land-use data. Please download the AERMET files of the relevant grids (centered at concerned ASRs) from SAMP for direct use to avoid mismatches	The AERMET has been revised.

Comments	Response
7. Please rectify the following discrepancies in AERMOD model - A. The location of ASR6 in model is inconsistent with that presented in Figure 2-2.	Figure 2-2 has been revised to match the model.
B. The coordinates of source SL_PLB in model is inconsistent with that presented in Appendix D.	The model has been revised to match with Appendix D of the revised EA in *Appendix I.*
C. The location of source SL_S_PD4 in the mode is inconsistent with that presented in Appendix D.	The model has been revised to match with Appendix D of the revised EA in *Appendix I.*
D. The NO2 and NO emission rates of sources SL_S_D7 and SL_S_PD8 in the model are inconsistent with those presented in Appendix D.	The model has been revised to match with Appendix D of the revised EA in *Appendix I.*
E. The road elevations in model are incorrect when compared with the elevations in Digital Topographic Map iB1000 (e.g., Kwai Chung Road).	The road elevations in model have been revised based on iB1000.
Email dated 28 February 2025 refers: **<u>Comments from Lands Department:</u>** **(Contact Person: Mr Ray CHENG Tel: 2402 1113)**	
Pursuant to the para. 3.6 of the revised Traffic Impact Assessment Report, there are only 10 spaces (including 3 nos. of unloading area without demarcation) provided within the Lot. The Applicant shall comply with the relevant provision requirement of spaces for parking, loading and unloading of motor vehicles under lease. Our previous comments 3 and 4 on the original submission remain valid.	Special Condition 12 in New Grant TW4668 says: *"Space shall be provided ... for the parking, loading and unloading of motor vehicles at the rate of not less than one vehicle for each 10,000 square feet or part of 10,000 square feet of floor area..."* Based on the proposed GFA of 10,500m^2, ie, 113,021ft^2, a total of 12

Comments	Response
	spaces (Calculation: 113,021ft^2 / 10,000 ft^2 = 11.3, say 12) should be provided. Please refer to **Figure 3.1** of the revised TIA in *Appendix II*. **Figure 3.1** shows the 12 spaces.
Email dated 28 February 2025 refers: **Comments from Transport Department:** **(Contact Person: Mr Kenneth LEE Tel: 2399 2420)** The revised TIA is considered unacceptable, and please find below our further comment on the R-to-C:	
1. #3 - As shown in the layout plan, there is only one raw material loading/ unloading bay LP03. Please clarify the figures provided in Table R1.	Please refer to **Figures 3.1** of the revised TIA in *Appendix II*. In addition to loading/unloading bay LP03, there are 3 raw material unloading bays, i.e., LP08-LP10 for 10m truck. Hence, there are 4 raw material unloading bays in total.
2. #5 - The proposed concrete batching plant is not necessarily linked up with the use of new concrete mixer trucks. Please provide supportive data on the available quantity and type of concrete mixer trucks in the market.	Consistent with the current trend, the Proposed Concrete Batching Plant will only use 10m^3 concrete mixer trucks.
3. #6 - In case 2 more vehicles are queued behind the waiting space LP02, the access for vehicles to depart from the plant is blocked. The internal traffic will be jammed and interlocked, which is impractical and unacceptable.	At each of the loading points LP04 – LP07, after a concrete mixer truck has been loaded with concrete, the truck will move forward (say, one vehicle length) for visual inspection of concrete, and free up the loading point, for a second concrete mixer truck to proceed to the loading point.

Comments	Response
	To ensure smooth operation of the Proposed Concrete Batching Plant and prevent the "*internal traffic will be jammed and interlocked*", the operator will have following measures: (i) The control room will monitor the traffic situation within the Proposed Concrete Batching Plant using CCTVs, (ii) GPS tracking units will be installed in the concrete delivery trucks, (iii) The control room will monitor the real-time delivery of all raw materials, and (iv) Worker will be deployed at the run-in/out to ensure safe entry and exit of vehicles. If waiting spaces LP01 and LP02 are occupied, the control room will inform drivers *en route* to the Proposed Concrete Batching Plant to slow down and / or wait at appropriate locations.
4. #7 - Please provide supportive information to demonstrate your argument of "*Reverse movements within a Proposed Concrete Batching Plant (and within the loading areas of buildings) are not uncommon in Hong Kong*	Disregarding whether the development is a Proposed Concrete Batching Plant or other uses, it is not uncommon for goods vehicles to make reverse movements to their respective loading areas. For example, for the approved S16 application for warehouse use (TPB: A/KC/505) at the Subject Site, all HGVs reverse to the 9 loading/unloading bays provided on G/F.
5. #8 - The concrete delivery truck has to be loaded before departing from the plant. It is not agreeable to describe the time required as "*momentarily*". The lack of waiting space may trigger queuing back to Wah Sing Street, which is unacceptable.	The control room will monitor the real-time delivery of all raw materials**.** If waiting spaces LP01 and LP02 are occupied, the control room will inform drivers *en route* to the Proposed Concrete Batching Plant to slow down and / or wait at appropriate locations. Hence, the manoeuvring of the tanker to loading/unloading bay LP03 is not hindered.
6. #9 - There is no buffer space between the swept path of container truck and the internal wall when it turns into LP01. It is considered impractical.	Please refer to **Figure SP101** of the revised TIA in *Appendix II*. The swept path analysis was re-conducted and shows that there is sufficient space between the container and the internal wall when it turns into

Comments	Response
7. #10 - Please elaborate how the assumption of 6 minutes time gap between the loading of each concrete mixer truck is made. It is also considered unrealistic for the proposed concrete batching plant to handle an hourly traffic of 116 vehicles (2-way).	LP01. In reality, some 13m-long container will be used for the Proposed Concrete Batching Plant. However, to be conservative, only 15m-long container is used for the swept path analysis. The cycle time required for loading operation for each concrete mixer truck is around 7 minutes, and is explained using a typical loading cycle, say, for LP04: 0700 hours: 1st concrete mixer truck arrives and enters loading point LP04. 0705 hours: The concrete mixer truck is loaded and move forward (say, one vehicle length) for visual inspection of concrete, which require no more than a minute. 0706 hours: A 2nd concrete mixer truck enters loading point LP04. Hence, there is a 6 minute time gap between the loading of each concrete mixer truck and the 2nd concrete mixer truck entering the loading point LP04. 0707 hours: The 1st concrete mixer truck departs. In reality, the maximum hourly peak traffic generation of 116 vehicles (2-way) only occurs during the concrete production peaks at: (i) around 7am, which would allow for concrete mixer trucks to reach their respective construction sites at the start of the work day, and (ii) around 3pm, which would allow for concrete mixer trucks to reach their respective construction sites for the final concreting prior to the end of the work day. Hence, the traffic generation stated in **Table 3.1** of TIA in *Appendix II* is only a worse-case scenario. In addition, the number of raw material delivery trucks arriving at the Proposed Concrete Batching Plant, depends on the demand for concrete,

Comments	Response
	and is not the same throughout the day. However, to be conservative, the high side number of raw material delivery trucks is adopted. Therefore, a conservative traffic generation of 116 vehicles (2-way) per hour is adopted for the AM and PM junction analysis.
8. #11 - The number of personnel as quoted in BD PNAP APP-120 is referring to the means of escape requirements, and it is nothing to do with the parking space requirements. It is considered that internal transport facilities should be provided in accordance with HKPSG.	There is no recommendation for parking requirement of the Proposed Concrete Batching Plant. Nevertheless, 2 motorcycle parking spaces are now provided based on the control room maximum GFA of around 120m^2. Please refer to **Figure 3.1** of the revised TIA in *Appendix II*.
9. #14 - Junction modification scheme with split-phase MOC without channelizing island is not acceptable.	The MOC is modified with no split-phase. Please refer to **Figure 4.4** of the revised TIA in *Appendix II*.
Email dated 18 February 2025 refers: **<u>Comments from Highways Department:</u>** **(Contact Person: Ms W K NG Tel: 2762 3965)** 1. 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.	Noted.
(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	Noted.

Comments	Response
be approved by TD and subsequently carried out by the applicant to HyD's standard. (iii) Para. 4.15 & 4.16 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	The Applicant will implement the proposed junction improvement at Tai Li Pai Road / Kwai On Road upon commencement of this project.
Email dated 18 February 2025 refers: **Comments from Kwai Chung Division, Hong Kong Police Force:** **(Contact Person: Mr Darren LAM Tel: 3661 2916)** Supplement to the comments on last reply dated 2024-12-27. This office has reviewed the revised assessment as well as police records related to the matter. Based on the submitted Traffic Impact Assessment, we strongly object the establishment of the application due to its significant negative impact on local traffic. The key concerns are as follows: (i) During peak concrete production hours (0600 to 1800 hours), the plant is expected to generate 62 vehicles per hour (40 concrete mixer trucks and 22 raw material delivery trucks). Over this 12-hour period, this totals 744 vehicles; (ii) During peak raw material delivery hours (1800 to 2300 hours), the plant will generate an additional 62 vehicles per hour (6 concrete mixer trucks and 56 raw material delivery trucks), totalling 310 vehicles over	*Traffic Generation* The traffic generation of the Proposed Concrete Batching Plant is revised (lowered) to be consistent with the Further Information No. 2 submitted on 27 January 2025. Please refer to **Table 3.1** of the TIA in *Appendix II*. In reality, the maximum hourly peak traffic generation of 116 vehicles (2-way) only occur during the concrete production peaks at: (i) around

Comments	Response
the 5-hour period; (iii) In total, the plant will introduce 1,054 vehicles per day in the road network. Given that the area has already recorded 195 complaints in the past six months about illegal parking and traffic congestion, the current infrastructure is clearly insufficient to handle existing traffic volumes. Adding over 1,000 additional heavy vehicles daily will exacerbate congestion, causing severe delays and disruptions for local road users. In sum, the proposed plaint will significantly increase traffic volume and worsen existing congestion and illegal parking issues. The current road infrastructure cannot support the additional vehicle activity, and the resulting traffic problems will negatively impact local residents and business, i.e. leading to more frequent traffic blockages and public dissatisfaction. Therefore, we object the application.	7am, which would allow for concrete mixer trucks to reach their respective construction sites at the start of the work day, and (ii) around 3pm, which would allow for concrete mixer trucks to reach their respective construction sites for the final concreting prior to the end of the work day. Hence, the traffic generation stated in **Table 3.1** of TIA in *Appendix II* is only a worse-case scenario. In addition, the number of raw material delivery trucks arriving at the Proposed Concrete Batching Plant, depends on the demand for concrete, and is not the same throughout the day. However, to be conservative, the high side number of raw material delivery trucks is adopted. Therefore, a conservative traffic generation of 116 vehicles (2-way) per hour is adopted for the AM and PM junction analysis. *Traffic Measures* To ensure smooth operation of the Proposed Concrete Batching Plant and prevent the "*illegal parking issues*", the operator will have following measures: (i) The control room will monitor the traffic situation within the Proposed Concrete Batching Plant using CCTVs, (ii) GPS tracking units will be installed in the concrete delivery trucks, (iii) The control room will monitor the real-time delivery of all raw materials, and (iv) Worker will be deployed at the run-in/out to ensure safe entry and exit of vehicles. If waiting spaces LP01 and LP02 are occupied, the control room will inform drivers *en route* to the Proposed Concrete Batching Plant to slow down and / or wait at appropriate locations.

Comments	Response
Email dated 18 February 2025 refers: **Comments from the Trade and Industry Department:** **(Contact Person: Miss Natalie LAM Tel: 3403 6091)** As mentioned in our previous comments, given that there is an estimated deficit of land for industrial uses as reflected in the 2020 Area Assessment of Industrial Land in the Territory ("2020 Area Assessments"), we have reservation about the proposal which may jeopardise the long term industrial-related uses of the subject premises.	Not to mention a concrete batching plant should be considered as an industrial use, it is somehow a 'semi-permanent' use. The Applicant is required to renew the license from EPD regularly, this ensures the concrete batching plant will be following the relevant regulations and guidelines accordingly. In other words, the concrete batching plant will only be able to sustain if it operates properly and bringing minimal environmental impact. If the demand for industrial floor space outweighs the demand for a concrete batching plant or the plant is no longer suitable to be located at the Site, a concrete batching plant is comparatively easy to be removed and redeveloped into an industrial building as it is kept within a non-permanent structure.
Email dated 18 February 2025 refers: **Comments from the Tsuen Wan and West Kowloon District Planning Office, Planning Department:** **(Contact Person: Mr Sam HO / Mr. Norris CHUNG Tel: 2417 6258 / 2417 6252)**	

Comments	Response
The Site is the subject of three approved applications for proposed minor relaxation of plot ratio restriction for the following uses: permitted industrial use (No. A/KC/485); permitted information technology and telecommunications industries (proposed data centre development) (No. A/KC/491); and permitted warehouse use (excluding dangerous goods godown) (No. A/KC/505). Please advise on the priority for implementation between the proposed scheme and the approved schemes, and appropriately justify the planning and market considerations behind this decision.	The Applicant is working closely with a potential tenant, who is an existing concrete batching plant operator. They shared their hands on experience and advised that the Site is suitable for a concrete batching plant.

Consolidated by: **KTA Planning Limited**

Date: **24 March 2025**

List of Appendices

Appendix I Revised Environmental Assessment

Appendix II Revised Traffic Impact Assessment