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By Email and Hand

Our Ref: S3020b/13WSS_KC/23/009Lg

9 May 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. 4

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 April 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 17 April 2025 refers: **Comments from Environmental Protection Department:** Further Information 3 - Environmental Assessment (EA) **General** 1. RtC Item 1 – Similar to the Noise chapter, please incorporate your response to Item 1 in a new section titled "Off-site Transportation" under the Air Quality chapter. Besides, please elaborate on the requirements under Section 3.3.10 of Chapter 9 in the HKPSG stating "The transportation routes to and from these [dusty] uses should be designed …… to minimise dust nuisance.", and provide details such as drawing(s) of tentative routings, etc.	Sections 2.4.12 and 2.4.13 have been added to incorporate the impact of offsite transportation. Section 3.3.10 of Chapter 9 of HKPSG has also been made reference to in Section 2.4.12.
Air Quality 2. Section 2.2.6: Please be informed that the Air Pollution Control (Fuel Restriction) (Amendment) Regulation 2024 took effect on April 1, 2025. The sulfur content limit for liquid fuel for industrial and commercial use has been tightened to 0.001% by weight.	Noted. Section 2.26 has been updated accordingly.
3. Section 2.3.6: Please review whether "two dump trucks per day" in Line 1 should be revised to "two dump truck trips per day".	Relevant text has been updated accordingly.
4. Section 2.4: Please provide a brief description of the overall process flow of the proposed CBP (e.g. textual description, process flow diagram, etc.) with each emission point (EP) involved in order to give a clear presentation of the operation.	Please refer to Figure 2-4 and Sections 2.4.3 – 2.4.8 accordingly.

Comments	Response
5. Section 2.4.3, 10th bullet point, RtoC#16: Please provide relevant information to support that the dust collectors can achieve a removal efficiency of 99.99%.	Product catalogue of dust collectors has been provided in Appendix A of the revised EA in *Appendix I*.
6. Table 2-4: Please add a table note to indicate that the full range of the assessment heights for each representative ASR has been covered.	A table note has been supplemented to Table 2-4 accordingly.
7. Section 2.5.2: Please consider revising the second sentence to "*Since the proposed project is scheduled for commissioning in 2026, the air pollutant concentrations for that year, as predicted by PATH v3.0, have been adopted as the future background concentrations for the assessment.*".	The second sentence in Section 2.5.2 has been revised accordingly.
8. Section 2.5.6, Appendix C, RtoC#19: Please follow up and provide TD's endorsement of the traffic data once available.	Noted. TD's endorsement has been incorporated in Appendix C of the revised EA in *Appendix I*.
9. Section 2.5.9: A. There should be a total of 13 HGV carparks, 5 HGV on-street parking sites and 1 coach on-street parking site within the 500 m assessment area. Please verify.	19 HGV and coach parking sites have been identified. Section 2.5.9 has been updated.
B. The number of parking spaces does not reflect the traffic volume. Please display all HGV/coach parking sites on a map and demonstrate that the emissions from these parking sites will not be underestimated by broadbrush approach (e.g. start emissions have been applied to the roads linked to the exit points of the parking sites).	Figure shows all identified HGV/coach parking sites has been presented in Appendix D. Please refer to the revised Section 2.5.9.

Comments	Response
10. Section 2.5.10: The meaning of the last sentence is not clear. Please consider adopting a conservative approach by assuming that 100% of the emissions within the PTI are released through the exhaust outlet of the mechanical ventilation system, with an additional 100% released via the egress.	Relevant text has been updated accordingly..
11. Section 2.5.11: Please specify the dates on which the site surveys were conducted.	Dates of the site surveys have been added accordingly.
12. Section 2.5.14: Please add "predicted" before "initial" in the definition of [NOx]ind.	Relevant text has been updated accordingly.
13. Tables 2-6 and 2-7: The new AQOs are tentatively scheduled for implementation in Q2 2025. Please consider including the new AQOs into the tables for comparison.	Noted, we have compared the results against the new AQOs as adopted in April 2025.
14. Appendix A, PDF Page 60: A. Please provide the reference sources for each parameter (i.e. coordinates, elevation, stack height, exit temperature, flow rate, exit velocity, outlet dimensions) in the table notes.	Reference sources of each parameters of the proposed plant have been added to Note 2 .
B. Please delete "*during daytime operation*" from the table title.	Noted, relevant text has been deleted accordingly.
C. The meaning of Note 1 is unclear. Please review whether it should be revised to "*Emissions from all Cementitious Material Silos are released through EP1 to EP4*".	Dust collectors will be provided for each silo and there are 4 silos for each of production line. The emissions from every 4 dust collectors of silos will be released through an emission point. The note has been revised accordingly.

Comments	Response
D. The information about the emission points EP1-EP4 and the corresponding dust collectors DC-1 to DC-4 are inconsistent with those in the following calculations (PDF Page 61, EP1 to EP4 from DC1 to DC16). Please review.	As response above, there will be 16 dust collectors for 16 silos and the emissions for every 4 dust collectors will be released through one EP. Hence, there will be 4 EPs (EP1-4) for 16 dust collectors (DC1-16).
E. The "Flow Rate (m3/hr)" and the "Exit Velocity (m/s)" do not match. Please verify.	Exit velocities for EP5-9 have been revised.
15. Appendix A, PDF Pages 61-62:	
A. Please incorporate RtoC#28G into the appendix for a brief description of the plant setup.	Relevant text has been incorporated in Appendix A of the revised EA in *Appendix I*.
B. EP1 to EP4, the 10 mg/m3 design standard regulated by BPM is applied to fixed emission points (i.e. EP1 to EP4 in this Project). Please review whether the calculations of concentrations (e.g. 2.36 mg/m3 for mitigated TSP emission of dust collector) are necessary or calculations of concentrations at EP1 to EP4 should be provided.	Noted, TSP concentrations have been removed.
C. EP1 to EP4: Please provide a detailed breakdown of the calculation steps for determining the emission rates from the silo to the emission point.	Noted, breakdown calculation for EP1-4 has been provided.
D. EP5 to EP8, the "*uncontrolled RSP emission factor of cement loading" and "uncontrolled RSP emission factor of PFA/GGBS loading*" are incorrect.	Note 6 has been revised.
E. EP5 to EP8, please specify the equations calculating the "*unmitigated TSP/RSP/FSP emission rate of each cement/GGBS/PFA holding hopper*".	Equation has been added to specify the emission rate.

Comments	Response
F. EP5 to EP8, please review whether the reference source for "*uncontrolled TSP/RSP emission factor of mixer (weigh hopper) loading for aggregate*" (Note 11) is relevant.	Noted, the reference source has been revised.
G. EP5 to EP8: please show detailed calculation steps for "*mitigated TSP/RSP/FSP emission rate of dust collector*".	Equation of the calculation has been added.
16. Appendix A, PDF Page 63: A. Please incorporate RtoC#29C into Note 2.	Noted, relevant text has been added in Note 2.
B. Please clarify the meanings of (A+F), (C+J), etc. or consider removing them.	Noted, relevant text has been removed.
C. Please incorporate RtoC#29F into Note 4.	Note 4 has been revised.
17. Appendix A, PDF Pages 71, 95 and 119: The TSP/RSP/FSP emission factors for aggregate trucks on paved roads are incorrect. Please revise the entire section accordingly.	The relevant section has been revised.
18. Appendix A, PDF Pages 80, 104 and 128: The TSP/RSP/FSP emission factors for cementitious materials trucks on paved roads are incorrect. Please revise the entire section accordingly.	The relevant section has been revised.
19. Appendix A, PDF Pages 87, 111 and 135: Note 4, please review the application intensity, as the estimate provided by the Engineer differs from the value used in the calculation (in PDF Page 136).	The relevant section has been revised.
20. Appendix A, PDF Page 136: Please review the accuracy of Note 3.	The relevant section has been revised.

Comments	Response
21. Appendix A, PDF Pages 137-141: A. Please include a note to state that the start emission data on these pages are used for start emission calculations for the trucks within the proposed development.	A note has been added accordingly.
B. The EMFAC input and output files should be provided for verification.	Noted.
22. Appendix A, PDF Page 141: Please remove the remark.	Noted, the remark has been removed.
23. Appendix A, PDF Pages 142-144, RtoC#36C: Please verify that the truck engines are turned off during loading and unloading activities; otherwise, idling emissions must be accounted for.	Truck engines will be turned off during loading and unloading, thus no idling emission would be anticipated.
24. Appendix A, PDF Page 142: Please revise "*Emission Factors*" in the table captions for FSP, NO and NO2 to "*Emission Rates*".	Noted, relevant text has been revised.
25. Appendix A, PDF Pages 145 and 146, RtoC#30: EP24_10 and EP24_13 are treated as different segment links in the calculation. Please clarify.	The figures are shown as same road segments but for travel routes of concrete mixer trucks and trucks for raw materials delivery separately. The labels of the figures of travelling routes within the plant have been revised for the sake of clarity.
26. Appendix C-2: "*73.21%" was assigned to "Proportion of Roads with Potential Start within Hong Kong*". Please show detailed approach and calculations to justify this value.	The ratio has been revised to 21.8% according to an approved planning application (TPB Ref.: A/YL-SK/410) as the latest traffic census. The Environmental Consultant is trying to seek for the data from TD and will be provided once available.
27. Appendix D, calculation file: A. Spreadsheet "Pop", Cell B86, Ex041 does not correspond to Euro V. Please review.	Relevant text has been revised.

Comments	Response
B. Spreadsheet "Pop", 2002 data is missing. Please review.	Noted, 2002 data has been added to the spreadsheet.
C. Spreadsheet "Idling EFs", Cell C42, the cold idling EF for Euro VI Diesel PV4 is incorrect.	Relevant data has been revised.
D. Spreadsheet "Idling EFs", Cells A52 and A83, please correct the typo.	Noted, typo has been revised accordingly.
E. Spreadsheet "Idling EFs", Cells C60, C61, C62, C133, the data should be obtained from the Annex A of the Technical Note "Calculation of Start Emissions in Air Quality Impact Assessment".	Noted, the relevant data has been extracted from the corresponding TN.
F. Spreadsheet "Idling EFs", Cells E62 and F62, refer to wrong cells.	The spreadsheet has been revised accordingly.
G. Spreadsheets "BusTerminus-KH (FBDD)", "BusTerminus-SL (FBDD)", "BusTerminus-LP (FBDD)", Cells C144:G167, the hot idling EFs are incorrect.	The spreadsheets have been revised accordingly.
H. Spreadsheets "BusTerminus-KH (Taxi)", "BusTerminus-KH (PLB)", "BusTerminus-SL (Taxi)", "BusTerminus-SL (PLB)", "BusTerminus-LP (PLB)", "BusTerminus-LB (Taxi)", Cells G45, G77, G109 and G141, please note that the maximum idling duration for adjusting start emissions varies depending on vehicle classes and fuel types (refer to Table 2 of the Technical Note "*Calculation of Start Emissions in Air Quality Impact Assessment*").	The max idling time for start adjustment for taxi has been revised. No change to PLB as the max idling time for adjustment of start emission is 1 min as Table 2 of Technical Note.

Comments	Response
I. Spreadsheets "BusTerminus-SL (Taxi)", "BusTerminus-SL (PLB)", "BusTerminus-LB (Taxi)", please clarify why the idling emissions from bypass vehicles are not included.	Idling emissions from bypass vehicles have been added.
J. Spreadsheet "BusTerminus-KH (PLB)", please correct the typo "*Taxi (Diesel)*…".	The spreadsheet has been revised accordingly.
K. Spreadsheets "xxx Summary", please clarify why 0800-0900 was selected as the base rather than the hour with the highest emissions.	Hourly profiles have been revised as based on the hours with the highest emissions.
28. Appendix E: Please clarify why the assessment did not include the complete range of heights for each ASR. For example, given that ASR1 is assessed at 11.5 mAG, 18.5 mAG and 93.5 mAG, please clarify whether there are any air-sensitive uses between 18.5 mAG and 93.5 mAG.	The heights where there is no fresh air intake or open window is not included for the ASRs. The height closes to emission level of stacks releases of proposed plant were selected. Table E-1 has been supplemented more information with to clarify.
Noise	
29. In view that the proposed development development is currently under preliminary design stage, the Applicant should confirm in Section 3.4.12 that "*During the upcoming detailed design and implementation stages, the applicant is committed to designing and installing all fixed noise sources to comply with the relevant noise requirements in HKPSG and NCO.*".	Section 3.4.12 has been revised accordingly.
30. Noted from Section 3.4.7 that the proposed CBP will be fully enclosed with concrete structure. The Applicant please confirm in Section 3.4.7 that "The applicant will undertake to implement the proposed extensive concrete enclosure design to fully enclose the proposed CBP with concrete structure.".	Section 3.4.7 has been revised accordingly.

Comments	Response
Waste Management and Land Contamination 31. Table 5-2: Following up on the previous comment, please clarify whether treatment options 2 and 3 for inert C&D materials are the same. If there are any concurrent projects that has agreed to accept the surplus inert C&D materials to be generated from this project, please specify the name of that project for clarity.	Noted. Option 2 – Offsite reuse/recycle has been deleted to avoid confusion.
32. Section 6.3.3 and Appendix J: It is understood that the Consultant would provide an update on the condition of ground floor of the subject site, we reserve our comment upon we receive the updated submission.	As summarized in Section 6.3.3, site walkover dated 10 March 2025 concluded that no land contamination potential is anticipated within the Site. Therefore, no further site investigation is required.
33. Section 6.3.4: Please follow up the outstanding reply from EPD regarding the record of registered Chemical Waste Producer or accidental spillage/leakage.	EPD's reply has been supplemented in Section 6.3.4 to Section 6.3.6 and Appendix K of the revised EA in *Appendix I*.
Email dated 29 April 2025 refers: **<u>Comments from Environmental Protection Department:</u>** Further Information 3 - Environmental Assessment (EA) **Air Quality Model** 1. The source ID representing the dust collector for aggregate transfer and paved road in NOx and NO2 model runs (EP21) is inconsistent with that presented in Appendix A (EP9). Please revise.	Noted, the source IDs have been revised.

Comments	Response
2. The source IDs representing the Shek Lei Taxi Stand in model are inconsistent with that indicated on the figure in Appendix D. Please revise.	Appendix D has revised accordingly.
3. Similar to grid (36,38), please supplement the surface characteristics for all the other grids to Appendix B for checking.	Surface characteristics of other relevant grids have been added.
4. The landuse parameters (Albedo, Bowen Ratio, Surface Roughness) of grid (36,38) and (37,38) for contour model runs do not match the landuse data. Please download the AERMET files of the relevant grids (centered at contour points) from SAMP for direct use to avoid mismatches.	Aermet files have been downloaded from SAMP and directly used in the model run.
5. The base elevations of the sources representing the emissions from bus and minibus termini and text stands in model are inconsistent with that presented in Appendix D. Please rectify.	Appendix D has been revised to be consistent to the model accordingly.
6. The release height and initial vertical dimension of the area sources representing the emissions from bus and minibus termini and text stands should be "top of plume / 2" and "top of plume / 2.15" respectively. Please double check and update the summary table in Appendix D, and revise the model accordingly.	The model and the summary of Appendix D have been revised.
7. The emissions from each of the openings of Kwai Hing Station Bus Terminus and Shek Lei (Tai Loong Street) Bus Terminus could be modeled as a single area source with release height at "height of opening / 2" and initial vertical dimension of "height of opening / 2.15" instead of using a series of volume sources, for simplification.	Openings for Kwai Hing Station Bus Terminus and Shek Lei (Tai Loong Street) Bus Terminus have been modified as area sources.
8. The road surface height (mPD) of elevated road (e.g. Kwai Chung Road, Castle Peak Road – Kwai Chung, etc.) should be adopted as	The base elevation and release heights have been revised.

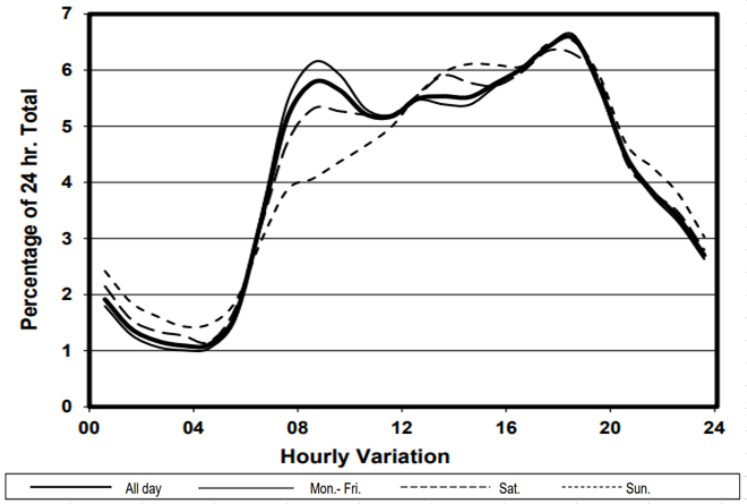
Comments	Response
the release height in model, while the base elevation in model should be the elevation of ground surface. Please double check and revise the model.	
9. The base elevations (mPD) of the assessment points of the contour model runs are inconsistent with the elevations of the actual ground surface. Please generate the contour points using the SAMP to avoid inconsistency.	Contour points have been revised.
10. The contour plot of the 10th highest daily average RSP at 63.5 mPD is inconsistent with the results generated based on the model output. Please rectify.	Model has been revised and results have been modified.
Email dated 17 April 2025 refers: **Comments from Lands Department:** **(Contact Person: Mr Ray CHENG Tel: 2402 1113)** The following previous comments remain valid: 1. The Applicant shall comply with the mentioned provision requirements of spaces of parking, loading and unloading of motor vehicles to the satisfaction of the Transport Department under Lease.	Noted.
2. 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.

Comments	Response
Email dated 17 April 2025 refers: **Comments from Transport Department:** **(Contact Person: Mr Kenneth LEE Tel: 2399 2420)** The revised TIA is considered unacceptable, and please find below TD's further comments on the revised TIA and R-to-C (FI3):	
1. The standard width of loading/ unloading bay for medium / heavy goods vehicle is 3.5m. The proposed size of LP08-LP10 is below standard which is unacceptable.	In view that the Hong Kong Planning Standards and Guidelines ("HKPSG") has no recommendation on the provision of internal transport facilities for a concrete batching plant, and the Lease of the subject site has no requirement on the size of the loading bay and modification of the Lease is not required should this planning application be approved by the Town Planning Board, the size of bays LP08-LP10 has been provided in accordance to the actual operational requirement.
2. Please also provide swept path for the raw material unloading bay LP10.	**Figure SP106** in **Appendix B** shows the swept path of unloading bay LP10. Please refer to **Appendix B** of the revised TIA in *Appendix II*.
3. The applicant should provide supportive data to substantiate that only 10m3 concrete mixer trucks would be used.	Euro IV diesel commercial vehicles not exceeding 30-tonnes will be gradually phased out by the end of 2027, in accordance Air Pollution Control Regulation by Environmental Protection Department. Hence, the existing concrete mixer trucks with $8m^3$ load capacity will be replaced by new trucks with $10m^3$ load capacity.

Comments	Response
4. #3 - Each of the loading points LP04 - LP07 would not have adequate length for two concrete trucks. Hence, it is impractical for "*the truck move forward of one vehicle length for visual inspection and free up the loading point to the second concrete mixer truck.*"	Each of the concrete loading points LP04 – LP07 is some 21m long and could accommodate 2 no. of 10m long concrete mixer trucks. Please refer to **Figure SP105** in **Appendix B** of the revised TIA in *Appendix II*.
5. #3 & #5 - Please advise where are the "appropriate locations" for drivers to wait.	If required by Transport Department, the Applicant would consider to arrange for concrete mixer trucks to wait in Ngong Shuen Chau, which is some 15 minutes journey time from the Proposed Concrete Plant.
6. #7 - For an hourly traffic of 116 vehicles (2-way), each vehicle has only half a minute to get access. It implied that there would be continuous vehicular movement at the run-in/out. As there would be pedestrians and other road users, the assumption is considered impractical.	The maximum hourly peak traffic generation of 116 vehicles (2-way) is a theoretical capacity, and to be conservative, this hourly flow is used in the traffic impact assessment. As a safety measure, a worker will be deployed at the run-in/out to alert pedestrians and other road users and ensure safe entry and exit of vehicles to the Proposed Concrete Batching Plant.
7. #8 - The proposed internal transport facilities do not comply with the requirement of HKPSG.	In view that the HKPSG has no recommendation on the provision of internal transport facilities for a concrete batching plant, and the Lease of the subject site has no requirement on the size of the loading bay and modification of the Lease is not required should this planning application be approved by the Town Planning Board, the size of bays LP08-LP10 is provided in accordance to the actual operational requirement.
Email dated 17 April 2025 refers: **<u>Comments from Highways Department:</u>** **(Contact Person: Ms W K NG Tel: 2762 3965)**	

Comments	Response
1. My previous comments on F.I.1 remain valid.	Noted. With regards to the proposed vehicular access and design of proposed junction improvement works, Transport Department had made comments on F.I.1 and F.I.2.
2. RtC (iii) – Please seek TD's comment on the design of proposed junction improvement works at Tai Lin Pai Road / Kwai On Road.	Noted. Transport Department had made comments on the design of proposed junction improvement works on F.I. 2.
Email dated 17 April 2025 refers: **<u>Comments from Kwai Chung Division, Hong Kong Police Force:</u>** **(Contact Person: Mr Darren LAM Tel: 3661 2916)** 1. Following a thorough review of the revised TIA and related police records, we maintain a strong objection to the proposed development outlined in the subject application. Our opposition is based on the significant and adverse effects the proposed facility would have on local traffic conditions and public road safety. The key concerns are as follows:- (a) According to the TIA, the development is expected to generate a peak hourly traffic flow of up to 116 vehicles (two-way), particularly around 0700 hours and 1500 hours. These periods coincide with critical rush hours associated with commuting and school traffic. The introduction of such volumes during these bottleneck periods is likely to severely disrupt traffic flow along Tai Lin Pai Road and Kwai Chung Road;	(a) In reality, the maximum hourly peak traffic generation of 116 vehicles (2-way) is demand dependent, and this is a theoretical capacity, and to be conservative, this hourly flow is used in this traffic impact assessment. If required, the Applicant would consider to arrange for concrete mixer trucks to wait in Ngong Shuen Chau, which is some 15 minutes' drive from the Proposed Concrete Plant.

Comments	Response
(b) Wah Sing Street, which connects Tai Lin Pai Road to Kwai Chung Road, is already a heavily utilized corridor. It is anticipated that queuing of vehicles (especially when accessing the plant) will cause spillover congestion, exacerbating existing traffic issues and potentially impeding access to and from Kowloon;	(b) A number of traffic management measures are proposed by the Applicant, including: (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 mixer trucks, (iii) the control room will closely monitor the 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 required by Transport Department, the Applicant would consider to arrange for concrete mixer trucks to wait in Ngong Shuen Chau, which is some 15 minutes journey time from the Proposed Concrete Plant.
(c) The TIA does not provide concrete estimates for traffic generation during non-peak hours. Without this data, it is prudent to take the peak hours figures as a baseline for broader assessment. Given the nature of the facility, the possibility of continuous inflow of MGVs throughout the day cannot be dismissed. Vehicle queuing outside the plant will likely result in roadside congestion;	(c) The Traffic Impact Assessment has considered the weekday peak periods which are the AM and PM peak hours, which is consistent with the hourly flow profile of the closest Annual Traffic Census ("ATC") core station 5007, i.e., Kwai Foo Road Road between Kwai Chung Road road and Hing Fong Road. Please refer to the hourly flow profile of this core station obtained from the 2023 ATC.

Comments	Response
	
(a) While it is noted that GPS tracking will be used to monitor incoming delivery trucks, such systems only indicate vehicle location and do not resolve the issue of physical space. In the event the waiting area is full, this will lead to illegal parking and further congestion;	(Apart from the use of GPS tracking, other traffic management measures to be adopted by the Applicant include: (i) the control room will monitor the traffic situation within the Proposed Concrete Batching Plant using CCTVs, (ii) the control room will closely monitor the delivery of all raw materials, and (iii) worker will be deployed at the run-in/out to ensure safe entry and exit of vehicles. If required by Transport Department, the Applicant would consider to arrange for concrete mixer trucks to wait in Ngong Shuen Chau, which is some 15 minutes journey time from the Proposed Concrete Plant.
(b) Over the past six months, the area has recorded 254 complaints related to illegal parking and traffic congestion, which indicates that the existing road infrastructure is already overburdened.	Noted.

Comments	Response
Introducing large amount of additional heavy vehicle trips per day will only worsen these conditions, leading to longer delays, increased safety risks, and further public dissatisfaction. 2. In sum, the proposed plant will pose substantial and unacceptable risks to local traffic conditions. The current road infrastructure is inadequate to support the additional vehicular load, particularly from heavy goods vehicles. The anticipated congestion and illegal parking will not only disrupt daily commutes and access to local businesses but also compromise road safety. Therefore, we object the application.	In sum, the TIA has demonstrated that the Proposed Concrete Batching Plant will result in no adverse traffic impact to the surrounding road network. In addition, should this application be approved, the Applicant will implement the improvement scheme at the junction of Tai Lin Pai Road / Kwai On Road.
Email dated 17 April 2025 refers: **<u>Comments from the Road Management Office, Hong Kong Police Force:</u>** **(Contact Person: Mr Benson TSE Tel: 3661 1388)** 1. I would need to echo the concerns of TD and Kwai Chung Police Division. As previously expressed, the entrance / exit at Wah Sing Street is a concern, and it only allows one vehicle at a time. Any delay inside the plant, or at the entrance / exit, would already cause congestion if any vehicle was already waiting outside. This would easily block the whole of Wah Sing Street and quickly spreading to Kung Yip Street. In theory, Wah Sing Street, should not have any vehicle needed to queue to get in. Therefore, is there any measure for the plant to divert vehicles away, once there is an issue at the plant or when congestion is seen? Also, as previously stated, queue outside the plant is also a road hazard and pedestrian hazard, as many	A number of traffic management measures are proposed by the Applicant, including (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 mixer trucks, (iii) the control room will closely monitor the 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 required by Transport Department, the Applicant would consider to arrange for concrete mixer trucks to wait in Ngong Shuen Chau, which is some 15 minutes journey time from the Proposed Concrete Plant.

Comments	Response
people cross the road in the vicinity, not to mention nearby buildings also have many goods vehicles.	
2. The TIA assessment of the existing traffic situation needs to look more into illegal parking issues seen. Including the location, time and severity of illegal parking, which has an effect on the roads capacity. The TIA should include a study into these issues to evaluate whether any problem would occur with their operations.	The Applicant has proposed traffic management measures as stated in our response to Comment 1.
Email dated 17 April 2025 refers: **Comments from the Tsuen Wan and West Kowloon District Planning Office, Planning Department:** **(Contact Person: Mr. Sam HO/Norris CHUNG Tel: 2417 6258/2417 6252)**	
1. According to the R-to-C table concerning TID, the applicant suggests that a concrete batching plant should be considered a 'semi-permanent' use. Please clarify the distinctions between 'permanent', 'semi-permanent' and 'temporary' industrial use, and confirm whether the captioned application pertains to a permanent development.	The Applicant is trying to seek for a planning permission for a permanent plant in order to contribute to providing constant supply of concrete for the construction industry of Hong Kong. The term 'semi-permanent' refers to the building structure of the plant. A concrete batching plant is different from a convention building, demolition is less complex and less costly. Reverting to a conventional industrial building is not impossible if there is a strong demand for industrial floorspace.
2. Our previous comment remains unaddressed. Please advise on the implementation priority between the proposed scheme (Application	The Applicant is trying to respond to the latest market demand. Please see below their latest response to the current application and previous approvals:

Comments	Response
No. A/KC/509) and the approved schemes (including Applications No. A/KC/485, A/KC/491 and A/KC/505).	Current (concrete batching plant) – in the pipeline A/KC/485 (workshop) – GBP approved A/KC/491 (data centre) – GBP approved A/KC/505 (cold storage) – subject to review

Consolidated by: **KTA Planning Limited**
Date: **9 May 2025**

List of Appendices

Appendix I Revised Environmental Assessment
Appendix II Revised Traffic Impact Assessment