

**Application under Section 16 of the Town Planning Ordinance
Proposed Minor Relaxation of Plot Ratio and Building Height Restrictions
for Permitted Information Technology and Telecommunications Industries (Data Processing Centre)
at 7-11 Wing Kin Road, Kwai Chung, New Territories
in DD 446, Kwai Chung Town Lot 145 and adjoining Government Land
at Wing Chong Street (Application No. A/KC/510)**

Departmental Comments	Response to Comments
<p><u>Comments from Planning Department dated 10.4.2025</u></p> <p>General comments</p> <p>Data Centre</p> <p>1. The Applicant should advise which tier of data centre is intended to redevelop at the captioned site.</p>	<p>A Tier 3 data centre is proposed at the application site.</p>
<p>2. The applicant should advise whether they have liaised with CLP on data centre facilities and/or taking account of their requirements/ guidelines/recommendations etc. Besides, the Applicant should advise which design measures were proposed to cater for data centre design requirements, which may be recommended by power supply and telecommunication services providers, if the design cannot meet Sustainable Building Design Guidelines (SBDG).</p>	<p>The proposed development has been developed in consultation with CLP, and the layouts fully consider their requirements.</p>

<p>3. PS Table 3.3: Noted there is no setback at Wing Chong Street at G/F to 5/F. The applicant should clarify whether such design is to cater for any design requirements of the proposed data centre as required under Building (Planning) Regulation (B(P)R) or CLP, etc.</p>	<p>The scheme now provides a setback at Wing Chong Street to comply with the prerequisites under PNAP APP-151 at G/F and 1/F.</p>
<p>4. PS Section A-A and paragraph 3.1.9: the applicant should elaborate on the proposed design of the location of the 132 kV Switchgear, cable gallery, protection/control room, 132/11kv transformer bay on G/F to 3/F in terms whether such design proposal have taken into account the guidelines or requirements from power supply and telecommunication network providers.</p>	<p>The proposals have been developed in consultation with CLP and the layouts have fully taken into consideration their requirements.</p>
<p>Figures 3.1O and 3.1P (detail comments marked in attached files)</p> <p>5. PS paragraph 3.1.7 – With reference to Figures 3.1O and 3.1P Isometric Drawings A and B, please supplement the width of the building setback (i.e. 6.53m) from 6/F and above facing Wing Chong Street. Detail comments marked in attached file.</p>	<p>Noted.</p> <p>Noted and revised accordingly.</p>
<p>6. PS Drawing No. A-04, Figures 3.1O and 3.1P – Thus, more annotation regarding provision/intention of design features should be indicated in Figures 3.1O and 3.1P (see also attached). It is noted that in addition to 3.7m full height setback facing Wing Kin Road, the Applicant also proposed maximum</p>	<p>Noted, the additional 4.3m setback accommodates the two underground fuel tanks.</p> <p>We have added a note that the setback proposed is for improvement of air ventilation, visual, and streetscape.</p>

<p>'4.3m' setback taking into account of underground fuel tank facilities, please indicate this information clearly in the Figure 3.1O. Also, the Applicant should advise the setback proposed is for improvement of air ventilation, visual and streetscape.</p>	
<p>7. PS Figures 3.1O and 3.1P and Section A-A – features should be clearly marked or annotated. The applicant should justify the location of the proposed vertical greenery is only available to the frontage at Wing Chong Street but not to the frontage at the development at Wing Kin Road from the perspective of the design requirements of the proposed data centre.</p>	<p>Vertical greening is added to the building frontage at Wing Kin Road. Relevant Isometric figures and Section AA have been revised accordingly.</p>
<p>Building Height (BH)</p> <p>8. The Applicant should advise whether the proposed building height (BH) is to cater for proposed plot ratio (PR), and take into account of SBDG, setback set out under the Kwai Chung Outline Development Plan (ODP) No. D/KC/D, data centre design requirements as per CLP's settings and layout etc.</p>	<p>The setback requirement per the Kwai Chung Outline Development Plan has reduced the site coverage of the lower floors of the podium by about 84.4m² or 8.76%. PNAP APP-132 has also been adopted for increased site coverage at lower floors. Together with CLP's requirements and data hall operation requirements, such as A/C, the proposed overall height is necessary to cater for such requirements.</p>
<p>9. The Applicant to confirm the current design as to provide vehicle parking spaces, some M&E and fuel tanks at basement levels is the approach to minimize the BH.</p>	<p>Vehicle parking spaces, M&E facilities, and fuel tanks are proposed at the basement level to minimise the building height.</p>
<p>10. PS Table 3.3 'Floor Height': the applicant should clarify whether there are data centre</p>	<p>CLP requirements for the 132/11kV transformer bays and switchgear necessitate an increased floor-to-floor height of 11m on G/F and 6m on 1-</p>

<p>requirements in terms of floor height (i.e. 11m for G/F, 1-3/F and 5.5m for 4-18/F in the proposal).</p>	<p>3/F. The data hall operation requirements, such as A/C and structure for long span beam depths, also increase the floor heights to 5.5m on 4-16/F.</p> <p>A data centre requires a typical floor height of 5.5m. We also wish to add that TPB has approved similar data centre applications, such as A/KC/466, A/KC/473, and A/KC/491, on 29/5/2000, 11/6/2021, and 26/8/2022, respectively.</p>
<p>Sustainable Building Design Guidelines (SBDG)</p> <p>11. The Applicant should advise which proposed design feature is in compliance with SBDG and which proposed design feature is not. Besides, non-compliance with SBDG may affect Gross Floor Area (GFA) concession under General Building Plan (GBP) submission. Applicant to advise whether their proposal have already taken account of GFA concession issue.</p>	<p>No additional GFA concessions are proposed for the development.</p>
<p>Canopies</p> <p>12. Planning Statement (PS) paragraph 3.1.10: the applicant should clarify providing a full-length canopy along the Wing Kin Road frontage is not allowable according to which particular fire safety guidelines or requirements, and the applicant should elaborate if there is other or any difficulty to provide in designing the canopy.</p>	<p>After further clarification with FSD, the canopy along Wing Kin Road has been revised to be fully extended to cover the entire frontage.</p>
<p>13. PS paragraph 3.1.10 – Please advise the widths of the full-length canopy along the building frontage facing Wing Chong Street and the canopy along the building frontage facing Wing Kin Road, if any.</p>	<p>Noted. The depth of the full-length canopy facing Wing Kin Road is added to the 1/F plan accordingly.</p>

<p>Please also annotate on Section A-A and Isometric Drawings A and B for the sake of clarity.</p>	
<p>14. Also, the applicant should justify the proposed height of 11m for the canopy at the Wing Kin Road frontage in terms of its functionality of weather protection to pedestrian. Applicant to clarify the height of the proposed canopy facing Wing Chong Street as well.</p>	<p>Noted, the canopy at Wing Kin Road has been lowered to provide a clear headroom of 6m. The canopy along Wing Chong Street is omitted since under B(P)R, a canopy shall be 1/10 of the street width, which in this case is 900mm. This provides minimal weather protection for pedestrians.</p>
<p>Setback</p> <p>15. PS Table 3.3: According to paragraph 3.1.7 and Isometric Drawing B, a 6.53m building setback from 6/F and above facing Wing Chong Street is proposed. Please clarify whether such feature are proposed under SBDG/ B(P)R/ or mainly voluntary.</p>	<p>The setback is to meet the permitted site coverage under PNAP-132.</p>
<p>Visual Impact Assessment (VIA)</p> <p>16. Paragraph 3.6.1 – Please update the conclusion of Visual Impact Assessment (VIA) taking into account our comments on VIA below.</p>	<p>The conclusion of the VIA has been updated accordingly.</p>
<p>Visual Impact Assessment (VIA)</p> <p>17. Paragraph 3.2 – According to the Town Planning Board Guidelines on Submission of VIA for Planning Application to the Town Planning Board (TPB PG-No. 41), the extent of the assessment area for VIA should equal to approximately three times of the height of the proposed development. As the absolute BH of the proposed development</p>	<p>The visual envelope for this VIA has been revised to about 303m.</p>

<p>is about 101m, the visual envelope for this VIA should be about 303m (i.e. 101m x 3).</p>	
<p>18. Paragraph 3.3 – Please supplement Kwai Chung Park to the south of the Site.</p>	<p>Kwai Chung Park is added to the text of the VIA.</p>
<p>19. Paragraph 4.1 - With reference to paras. 3.1.5 to 3.1.7 of PS, two setbacks, including a 3.7m full-height setback from the site boundary abutting Wing Kin Road and a 6.53m setback from 6/F and above along Wing Chong Street, are incorporated in the proposed development. Please review/rectify.</p>	<p>The 3.7m full-height setback fronting Wing Kin Road and buildings set back from 6/F and above facing Wing Chong Street are added to the VIA.</p>
<p>20. Paragraph 5.1 – It is noted that the VPs at Wing Kei Road Trucks Car Park and Kwai Chung Park under the previously approved Application No. A/KC/496 are not included in the subject VIA as they are currently closed for public access due to the construction works as claimed by the applicant. In this connection, please explore a VP at Wing Kei Road 5-A-Side Soccer Pitch to the northwest of the Site and a VP near the temporary cricket ground in Kwai Chung Park to the south of the Site.</p>	<p>The VIA report has assessed and incorporated the visual impact of the VPs at the former Wing Kei Road Trucks Car Park and Kwai Chung Park.</p>
<p>21. Paragraph 6.3.1 (4th line) and paragraph 6.3.2 (6th line) – Please revise to read as “Kerry Tc Warehouse 2”.</p>	<p>Text amended.</p>
<p>22. Paragraph 6.3.2 – Please review whether the BHs of Kerry Tc Warehouse 2, Global Trade Centre and Mei Kei Industrial Building should be 108.58mPD, 93.4mPD and 91.58mPD respectively.</p>	<p>The building heights of Kerry Tc Warehouse 2, Global Trade Centre, and Mei Kei Industrial Building have been revised to 108.58 mPD, 93.4 mPD, and 91.58 mPD, respectively.</p>

<p>23. Paragraph 6.4.2 – Judging from the photomontage, please supplement the proposed development would block the open sky view and reduce visual permeability. As such, it would be more tenable to grade the visual impact to VP4 as “moderately adverse” rather than “slightly adverse”.</p>	<p>As shown in the photomontage of VP4, the proposed development will be blocked by Wing Loi Industrial Building. Nevertheless, the proposed development will block the gap of an open sky view. Hence, the visual impact from this VP is revised to moderately adverse instead of slightly adverse.</p>
<p>24. Paragraph 6.6.1 – The distance between VP6 and the proposed development should be about 720m instead of 650m.</p>	<p>Text amended.</p>
<p>25. Paragraph 6.6.1 – (a) The distance between VP6 and the proposed development should be about 720m instead of 650m. (b) Please supplement VP6 is dominated by the football ground and running track with open sky view.</p>	<p>Text amended</p>
<p>26. Paragraph 6.6.2 – Please consider to delete “existing clusters of industrial buildings Yee Lim Industrial Building (78.8mPD) and” in the 2nd and 3rd lines.</p>	<p>The sentence “existing clusters of industrial buildings..... Yee Lim Industrial Building (78.8mPD) and” has been deleted from the text.</p>
<p>27. Figure 1 – Judging from the photomontages, the photo-taking point of VP3 should be located to the further northwest and the photo-taking point of VP6 should be located to the further northeast.</p>	<p>The location of VP3 and VP6 has been adjusted.</p>
<p>28. Figure 4 (VP3)– Please revise to read as “Wonderland Villas”.</p>	<p>Figure amended.</p>
<p>29. Figure 5 (VP4)–</p>	<p>Figure amended.</p>

<p>(a) The BH of the proposed development should be 109.55mPD instead of 115.2mPD.</p> <p>(b) For the sake of clarity, please annotate Wing Loi Industrial Building.</p>	
<p>30. Figure 7 (VP6) –</p> <p>(a) It seems that the proposed development should appear to be shorter.</p> <p>(b) The BH of Yee Lim Industrial Building should be 78/76mPD instead of 63.4mPD.</p>	<p>Figure amended.</p> <p>The BH of Yee Lim Industrial Building has been revised to 76-78 mPD.</p>
<p>31. Figure 8 (VP7) – It seems that the proposed development should appear to be shorter which would be completely blocked by Tsuen Wan Chinese Permanent Cemetery. As such, it would be more tenable to grade the visual impact to VP7 as “negligible” rather than “slight”. Please update the visual analysis in para. 6.7.2 accordingly.</p>	<p>Figure amended and rating revised to “negligible”.</p>
<p>32. Paragraph 7.1 – Please update the conclusion of VIA taking into our comments above, as appropriate.</p>	<p>The conclusion of the VIA has been revised. The revised VIA report is enclosed in Attachment 2.</p>
<p>Comments from Architectural Services Department (ArchsD):</p> <p>33. Based on the information provided, it is noted that the proposed development mainly consists of one building block with a plot ratio (PR) of 11.4 (a 20% increase from the maximum PR of 9.5 allowed under the current approved Kwai Chung Outline Zoning Plan No. S/KC/32 (the OZP)) and a BH at 109.55mPD (a 4.33% increase from the BH restriction of 105mPD as stipulated on the OZP. It</p>	<p>Noted.</p>

<p>is also noted that the proposed PR and BH is the same and reduces respectively as compared with a previously approved planning application i.e. A/KC/496. From the photomontages provided, it appears that the proposal would have little visual impact to the surrounding environment. We have no comment from architectural and visual impact point of view, subject to PlanD's views above.</p>	
<p>Comments from Highways Department (HyD):</p> <p>34. Figure 3.10 and 3.1P – please specify the dimension of canopy projecting over the public footpath at Wing Chong Street and in close proximity to the Pink Hatched Blue Area at Wing Kin Road. The Applicant should observe the requirements of canopy under CAP. 123F Building (Planning) Regulation and submit the details of the canopy to Buildings Department for vetting.</p>	<p>Noted and revised accordingly.</p>
<p>35. Paragraph 3.1.5 PS- The 3.7m setback from existing lot boundary is not required by HyD, please revise.</p>	<p>Noted. PS has been revised, and the previous reference about HyD has been deleted from the text.</p>
<p>36. Should there be any HyD's inventory such as existing pavement, exclusive road drain etc. affected due to the proposed development, the relevant details shall be submitted for HyD's comment and the roadworks carried out by the Applicant shall be in accordance with HyD's standard.</p>	<p>Noted. HyD's comments will be sought during the detailed design stage.</p>
<p>Comments from Water Supplies Department (WSD):</p>	

<p>37. As a data centre will usually involve high water demand, the Applicant is advised to prepare a Water Supply Impact Assessment (WSIA) to assess water demand and propose the necessary improvement works on the existing fresh water distribution system so as to secure water supply for the proposed development.</p>	<p>A Water Supply Impact Assessment has been prepared and is attached in Attachment 3.</p>
<p>38. Should you have any enquiries on the comments from WSD, please contact Mr. Eddie HE of WSD at 2152 5746 or the undersigned regarding the application.</p>	<p>Noted.</p>
<p>Comments from Environmental Protection Department (EPD):</p> <p>General</p> <p>39. Since the application site falls within the consultation zone of the Gin Drinkers Bay Landfill, Landfill Gas Hazard Assessment shall be conducted in accordance with Landfill Gas Hazard Assessment Guidance Note (EPD/TR8/97).</p>	<p>A landfill gas hazard assessment will be conducted during the detailed design stage.</p>
<p>40. It has been noted that an existing industrial building will be redeveloped into a new data centre. However, the information provided lacks details about the industries and operations that have taken place on the ground floor of the subject site over time. Please conduct a land contamination assessment to address any potential land contamination at the subject site.</p>	<p>A land contamination assessment will be conducted during the detailed design stage.</p>
<p>Air Quality Impact Assessment (Appendix II)</p>	

<p>41. Section 2.3 – Please advise when the chimney survey conducted, if any. Please be reminded that it should be the responsibility of the applicant and their consultant to ensure the validity of the chimney data by their own site survey(s). Should the information of industrial chimneys be subsequently found to be incorrect, the assessment results as presented would be invalidated.</p>	<p>An on-site survey and desktop study were conducted in April 2022 and updated in December 2024 to identify the industrial chimneys in the area. Section 2.3.1 has been revised accordingly (see Attachment 4).</p>
<p>42. Section 6 – A. Noted from Drawing No. A-03 under Appendix 2-1 that carpark is proposed at B1/F and G/F. Please be advised to follow “ProPECC PN 2/96 - Control of Air Pollution in Car Park”.</p>	<p>Sections 3.9.1 & 6.5 have been revised accordingly.</p>
<p>B. Please advise any utilization of fossil fuels during normal operation and any emergency generators for backup purpose.</p>	<p>In the current design, backup generators powered by diesel fuel will be provided to address potential electricity outages or emergencies. These backup generators will not operate during normal conditions. Aside from the backup generators, no diesel or other fossil fuels will be utilised in the project. Section 6.4 has been supplemented accordingly.</p>
<p>43. Section 6.2.2 – Please provide relevant information of the Annual Traffic Census 2023 to support that Wing Kin Road and Wing Chong Road are classified as Local Distributors.</p>	<p>The correspondence with the Transport Department regarding road classification is supplemented in Appendix 6-1. Section 6.2.2 has been revised accordingly.</p>
<p>44. Section 6.2.3 Bullet 4 – Please revise the sentence as “..... the buffer region of the chimney at Kwai Chung Crematorium <u>Wing Loi Industrial Building (CH01b)</u>”.</p>	<p>Section 6.2.4 Bullet has been revised accordingly.</p>
<p>45. Figure 6-3a to 6-3g – To facilitate checking, please supplement (i) the height range of the proposed fresh air intake and (ii) the chimney height (in terms of mPD). Based on the information in</p>	<p>The tables for the list of chimneys (Table 6-1) and Floor Levels (Table 6-2) have been supplemented for better presentation.</p>

<p>Drawing No. Section A-A under Appendix 2-1 and Figure 2-3, please review the following buffer regions in corresponding figure.</p>	<p>Floor levels have been shown in the captions of Figures 6-3a to 6-3g. In addition, more information about the buffer regions has been included.</p>
<p>A. Figure 6-3c: CH02 of 52mPD against 2/F Ceiling of 32mPD Since the vertical difference between CH02 and the expected intake will be 20mPD, please review if the Buffer Region of “20m-30m below chimney exhaust” is missing.</p>	<p>Since the Buffer Region of “20m-30m below chimney exhaust” for CH02 is far from the proposed development, it is not included in Figure 6-3c. Please refer to Figure 6-2b for the buffer region for 32mPD and below.</p>
<p>B. Figure 6-3d: CH01b of 85mPD against 3/F Ceiling of 38mPD Since the vertical difference between CH01b and the expected intake will be 47mPD, please review if the Buffer Region of “> 40m below chimney exhaust” should be adopted instead.</p>	<p>The buffer region of CH01b shall be limited to 20m for 3/F. Therefore, its buffer region will be out of range and not visible in Figure 6-3d. Figure 6-3d has been revised accordingly.</p>
<p>C. Figure 6-3g: CH03a of 99mPD against 7/F Ceiling of 60mPD Since the vertical difference between the CH03a and the expected intake will be 39mPD, please review if the Buffer Region of “30m-40m below chimney exhaust” should be adopted instead.</p>	<p>The fresh air intake on 7/F shall be limited to 59mPD. Section 6.3.2 Bullet 3 and Figure 6-3g have been revised accordingly.</p>
<p>Sewerage Impact Assessment (Appendix IV)</p>	
<p>46. Section 2.1.2 – Please supplement the application no. and approval year of the previous planning application for industrial use (warehouse).</p>	<p>The application number and approval year are indicated in Section 2.1.2 of SIA (v1.0) (see Attachment 5).</p>
<p>47. Section 3.2 – Please advise if there is discharge of bleed-off water from cooling tower into the sewerage system. If yes, such discharge rate should be included.</p>	<p>Bleed-off water from the proposed data centre's water-cooling system will be discharged to the public sewerage system. The discharge of water from the water-cooling system has been included in the calculation. Sections 3.2.1 to 3.2.3, 4.1.2, Tables 3-1, 3-4 & 3-5, and Appendix 3-2 have been updated accordingly.</p>

<p>48. Section 3.2.2 – The applicant should have information about the number of staffs to be hired for the proposed data centre, estimation of employee population using GFA should be avoided.</p>	<p>The applicant planned to hire 20-25 staff for the proposed data centre. Therefore, 25 staff members were adopted to calculate the sewage discharge from the proposed data centre for conservatism. Section 3.2.2, Tables 3-1, 3-4 & 3-5, and Appendix 3-2 have been updated accordingly.</p>
<p>49. Section 3.2.3 – Please review the unit flow factor for the employees of the proposed development, and revise the sewage estimate as appropriate.</p>	<p>The Unit Flow Factor of 0.28m³/day for J11 (Community, Social & Personal Services) in Table T-2 of GEFS has been adopted. Section 3.2.2, Tables 3-1, 3-4 & 3-5, and Appendix 3-2 have been updated accordingly.</p>
<p>50. Please be reminded that the implementation of local sewer connection/upgrading/diversion works shall meet the satisfaction of Drainage Services Department.</p>	<p>Noted.</p>
<p><u>Comments from Planning Department dated 11.4.2025</u></p> <p>General comments</p> <p>1. According to the aerial photo of 2023, the site is situated in an area of industrial urban landscape character predominated by a mix of commercial, industrial and industrial-office development. The site is currently occupied by an existing industrial building without any landscape resources. The proposed use is not incompatible with the surrounding environment. Hence, we have no objection in principle to the application from landscape planning perspective.</p>	<p>Noted.</p>
<p>2. Comments on the submission from landscape planning perspective:</p>	

<p>(a) Noting green wall was proposed at the facades facing Wing Kin Road and Wing Ching Street (Dwg. No. AR10 and AR11), the Applicant is advised to indicate the proposed green wall on section/elevation drawing(s) for reference.</p>	<p>Noted and revised accordingly.</p>
<p>(b) It is noted that the planters are proposed on several floors. The Applicant is advised to provide typical planter details to demonstrate sufficient soil provisions for the proposed planters on G/F, 1/F, 2/F and 3/F, in particular, minimum clear soil depths of 1200mm, 600mm and 300mm should be provided for trees, shrubs and groundcover planting respectively for their sustainable growth.</p>	<p>Noted and revised accordingly.</p>
<p>(c) The Applicant is recommended to further explore the planting opportunity of the Wing Kin Road to enhance the landscape quality and provide more greenery particularly at pedestrian level.</p>	<p>Noted and revised accordingly.</p>
<p>Advisory comments</p> <p>3. The Applicant is reminded that approval of the Section 16 application under Town Planning Ordinance does not imply approval of the site coverage of greenery requirements under APP PNAP-152 and/or under the lease. The site coverage of greenery calculation should be submitted separately to Buildings Department for approval.</p>	<p>Noted.</p>
<p><u>Comments from Transport Department (TD):</u></p> <p>Comments in the TIA from traffic and transport point of view:</p>	

<p>4. Please review if more parking space, especially motorcycle, could be added.</p>	<p>It should be noted that internal transport facilities for the Proposed Data Centre are provided in accordance to the Clauses 22(a)(i)(I), 22(c)(i)(I), 22(e)(i)(I), 22(e)(ii)(I) and 22(e)(iii)(I) of the draft Provisional Basic Terms Offer.</p>																															
<p>5. Section 2 refers. Please also provide the link capacity assessment for the existing condition.</p>	<p>Existing link capacity assessment is conducted and shown in Table 2.8 of the revised Traffic Impact Assessment (the “revised TIA”) (see Attachment 6).</p>																															
<p>6. Section 2.9 refers. Please include the dates which the trip generation survey were carried out.</p>	<p>Table 2.2 of the revised TIA contains the trip generation survey dates of the 3 surveyed data centres.</p>																															
<p>7. Section 4.12 refers. Table 4.6 does not match with Figure 4.3 and 4.3. Please review and clarify. (a) J2 Kwai Hei Street / Wing Kei Road: W-CB (b) J3 Kwai Hei Street / Wing Chong Street: W-BA and W-BC (c) J4 Kwai Hei Street / Wing Kin Road: W-CB (d) J6 Shing Yiu Street / Wing Kei Road: W-CB</p>	<p>We refer to <u>Section 2.4.1.1 in Chapter 2.4 of Volume 2 of Transport Planning & Transport Planning & Design Manual (“TPDM”)</u>, where the 2-way design flow for a local road is 800 veh/hour. In order to conduct a link capacity assessment, the traffic flow is converted from pcu/hour (as shown in Figures 4.2 and 4.3) to veh/hour. For ease of reference, the traffic flows in the pcu/hr for Wing Kei Road, Wing Kin Road and Kwai Hei Street are presented in Table R1.</p> <p>TABLE R1 TRAFFIC FLOWS IN PCU / HOUR</p> <table border="1" data-bbox="926 976 1887 1344"> <thead> <tr> <th rowspan="2">Ref</th> <th rowspan="2">Links</th> <th rowspan="2">Scenario (Without / With Proposed Data Centre)</th> <th colspan="2">Traffic Flow (pcu/hour)</th> </tr> <tr> <th>AM Peak [a]</th> <th>PM Peak [b]</th> </tr> </thead> <tbody> <tr> <td rowspan="2">L1</td> <td rowspan="2">Wing Kei Road</td> <td>Without</td> <td>455</td> <td>283</td> </tr> <tr> <td>With</td> <td>459</td> <td>288</td> </tr> <tr> <td rowspan="2">L2</td> <td rowspan="2">Wing Kin Road</td> <td>Without</td> <td>295</td> <td>391</td> </tr> <tr> <td>With</td> <td>301</td> <td>395</td> </tr> <tr> <td rowspan="2">L3</td> <td rowspan="2">Kwai Hei Street</td> <td>Without</td> <td>556</td> <td>474</td> </tr> <tr> <td>With</td> <td>560</td> <td>478</td> </tr> </tbody> </table>	Ref	Links	Scenario (Without / With Proposed Data Centre)	Traffic Flow (pcu/hour)		AM Peak [a]	PM Peak [b]	L1	Wing Kei Road	Without	455	283	With	459	288	L2	Wing Kin Road	Without	295	391	With	301	395	L3	Kwai Hei Street	Without	556	474	With	560	478
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Based on the survey results, the pcu factors are found to be **1.36** and **1.40** in the AM and PM peak hours respectively. The converted traffic flows in **veh/hour** are found in **Table R2** and these are adopted for link capacity assessment which is presented in **Table 4.6** found in the revised TIA.

TABLE R2 TRAFFIC FLOWS IN VEH / HOUR

Ref	Links	Scenario (Without / With Proposed Data Centre)	Traffic Flow (veh/hour)	
			AM Peak [c] ⁽¹⁾	PM Peak [d] ⁽²⁾
L1	Wing Kei Road	Without	335	203
		With	338	206
L2	Wing Kin Road	Without	217	280
		With	222	283
L3	Kwai Hei Street	Without	409	339
		With	412	342

Note: ⁽¹⁾ [c] = [a] in Table R1 / 1.36 ⁽²⁾ [d] = [b] in Table R1 / 1.40

8. Please demonstrate that V-rCB is 170m at J4 Kwai Hei Street / Wing Kin Road.

We refer to the calculation in Appendix 1 of the revised TIA. The visibility V-rCB at J4 Kwai Hei Street / Wing Kin Road is 110m, as indicated in Figure R1 (see **Attachment 7**).

9. Lane A4 at J5 Wing Kei Road / Kwai Fuk Road is relatively short. Please reduce saturation flow of A4 to reflect the short lane effect.

The updated calculation is found in Appendix 1 of the revised TIA.

10. For Table 2.5, only KMB are mentioned in the table. Please suitably revise the “note” underneath the table.

Noted. Table 2.5 in the revised TIA is updated.

Comments from Drainage Services Department (DSD): dated 14.4.2025

Please find below comments on the SIA:

<p>2. Appendix 3-1: Please provide supporting information on the area of different categories.</p>	<p>As mentioned in Section 3.3.2, the GFA of the catchment is calculated based on the land lot area and the maximum allowable plot ratio of 9.5, except for the specified catchment. The area of the land lot is estimated in the GeoInfo Map. Appendix 3-1 has been revised with a supplementary note to demonstrate the estimation.</p>
<p>3. Section 3.2 – Please advise if there is any discharge from cooling system into the public drainage system.</p>	<p>Bleed-off water from the proposed data centre's water-cooling system will be discharged to the public sewerage system. The discharge of water from the water-cooling system has been included in the calculation. Sections 3.2.1 to 3.2.3, 4.1.2, Tables 3-1, 3-4 & 3-5, and Appendix 3-2 have been updated accordingly.</p>
<p><u>Comments from Buildings Department (BD) dated 15.4.2025</u></p> <p>Please find below comments under the Buildings Ordinance (BO) based on the information provided:</p> <p>1. BD has no objection to relax the plot ratio from 9.5 to 11.4 and the height restriction from 105mPD to 109.55mPD noting that the development parameter do not exceeding the limitation under the First Schedule of Building (Planning) Regulations (B(P)R);</p>	<p>Noted.</p>
<p>2. Regarding the relaxation of site coverage under First Schedule of B(P)R, i.e. 82%, which is only permissible in non-domestic building for the building height not more than 40m from street level on the basis of complying requirements as stipulated in PNAP APP-132, modification should also be applied with specified form and justification during building submission stage for BD further consideration;</p>	<p>Noted.</p>

<p>3. Regarding the site area, the proof of site parameter should be submitted during building plan submission stage for BD further consideration and complied with PNAP ADM-21;</p>	<p>Noted.</p>
<p>4. There is no definition for “pre-1987 industrial building” under BO. Therefore, BD has no comment on it. It is noted that the Occupation Permit (no. : NT105/72) for storage area and dangerous goods storage was issued for the existing building on 6.6.1972;</p>	<p>Noted.</p>
<p>5. Prerequisites under PNAP APP-151 and sustainable building design requirements (building separation, building set back and site coverage of greenery) under PNAP APP-152 would be applicable to the building plan submission if gross floor area (GFA) concessions for non-mandatory areas/greenery features are to be applied or relaxation of site coverage in accordance with PNAP APP-132. Attention is drawn to the applicant that the proposed building shall be set back from Wing Chong Street in compliance with the provision in paragraph 7 of PNAP APP-152. Given that the site area does not exceed 20,000 m² and the continuous projected façade length is less than 60 m, and considering that the site area is also less than 1,000 m², it follows that building separation and the provision of greenery are generally not required in accordance with PNAP APP-152;</p>	<p>Noted, and the setback is provided accordingly.</p>
<p>6. Regarding the canopy project over street i.e. Wing Cheong Street, it was subjected to the compliance</p>	<p>Noted. The canopy along Wing Chong Street has been omitted.</p>

<p>with the requirements of regulation 10 of the B(P)R. Attention is drawn to the applicant that the site coverage and plot ratio for the canopy may be excluded if the criteria set in paragraph 3(k) of PNAP APP-19 was met;</p>	
<p>7. Emergency vehicular access shall be provided for all the buildings to be erected on the site in accordance with the requirement under the Regulation 41D of the B(P)R;</p>	<p>Noted. EVA shall be provided accordingly. Details shall be submitted during the GBP stage.</p>
<p>8. For UBW erected on leased land, enforcement action may be taken by the BD to effect removal in accordance with the prevailing enforcement policy against UBW as and when necessary. The granting of any planning approval should not be construed as an acceptance of any existing building works or UBW on the application site under the BO;</p>	<p>Noted.</p>
<p>9. Detailed checking under the BO will be carried out at building plan submission stage.</p>	<p>Noted.</p>
<p><u>Comments from Fire Services Department (FSD) on 2.5.2025</u></p> <p>FSD has adverse comments; details are as follows:</p> <p>1. The underground fuel tank should be fully ventilated directly to the open air.</p>	<p>Noted.</p>
<p>2. Based on the information provided by the applicant, FSD raises no objection to the two proposed 30,000L underground fuel tanks on B1/F, and the fuel tank room on R/F from a Dangerous Goods (DG) licensing perspective. However, the</p>	<p>The fuel tank room has been omitted accordingly.</p>

proposed fuel tank and pump room No.1 and No. 2 on G/F with fuel tank and fuel pump sited in the same room are considered unacceptable.	
3. The applicant should read the FSD Publication “A Guide to Application for Dangerous Goods Licence and Approval” before submitting a DG application to FSD.	Noted.