**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 (Further Information (F.1.)(2) | Response to Comments |
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| **Comments by Planning Department (27.8.2025)** | |
| ***Revised Visual Impact Assessment (VIA)***<br><br>1. Paragraph 4.1 – The 5th line should read as "2.948m building setback fronting Wing Chong Street from G/F to 1/F" to tally with Table 3.3 of the revised Planning Statement (PS). | The text in **Paragraph 4.1** has been revised. Please refer to the enclosed replacement page 3 in **Attachment 1**. |
| 2. Figures 1 to 10 – "Date Centre" in the title of the figures should read as "Data Centre". | The word has been amended in **Figures 1** to **10**. Please refer to the enclosed Figures 1 to 10 in **Attachment 1**. |

| **Comments from Environmental Protection Department (27.8.2025)** | |
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| ***Revised Air Quality Impact Assessment (AQIA)***<br><br>3. Section 2.2.2: Please verify whether the proposed development operates exclusively on electricity or if any fuel-powered equipment will be deployed. As emergency generator(s) will be installed, please clarify whether routine running tests will be conducted. It is inappropriate to conclude that "The proposed development…is not expected to generate air pollutants" without providing any information on the routine running tests. Information on the testing frequency and duration, etc.., should be supplemented. | The proposed development is intended solely for data centre use and will operate exclusively on electricity supplied by CLP. Backup generators will be provided to address potential electricity outages or emergencies. No diesel or other fossil fuels will be utilised during the normal operation of the proposed development.<br><br>The proposed development is not considered a source of air pollutants during normal operation. During routine testing, given the short operational duration of the backup generators and the necessary mitigation measures to be confirmed in the APCP, adverse air quality impacts arising from the routine testing are not anticipated.<br><br>The information regarding the backup generator has been supplemented in **Sections 2.2.2 to 2.2.7** of the revised AQIA report, attached as **Attachment 2**. |
| 4. Section 2.3.1: Please note that an updated site survey is required to verify the current status of air emission sources in the surrounding environment. | An updated site visit was conducted on 28th August, 2025.<br><br>**Section 2.3.1** and **Appendix 2-2** have been updated accordingly. |
| 5. Sections 2.3.1 – 2.3.3, 6.2.3, Appendix 2.2: 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. | Noted. |

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| 6. Section 2.3.2: Please clarify the meaning of "the latest information" in Line 2. Please provide supporting information, such as written confirmation from the operator or building management, and/or site surveys, to substantiate the claim that no chimney exists on the roof of Mei Kei Industrial Building. | It is noted that a chimney-like structure was present on the roof of the Mei Kei Industrial Building, as indicated by a 3D map from Google. However, based on the site visit on 28th August 2025, there is currently no chimney on the roof of the Mei Kei Industrial Building.<br><br>**Appendix 2-2** has been updated accordingly. |
| 7. Section 2.3.3:<br><br>-The statement that no significant emissions are expected from the data center lacks justification. Please provide information on the operation of the data center, e.g. whether routine running tests on emergency generator(s) will be conducted similar to our comments on Section 2.2.2 above.<br>-The meaning of the last sentence is unclear. | The chimneys of Citic Telecom Tower have been included in the assessment.<br><br>**Section 2.3.3**, **Table 2-1** and **Appendix 2-2** have been revised accordingly. |
| 8. Section 2.4.1: The first sentence is not justified. Potential air quality impacts depend on both traffic intensity and the distances between air-sensitive uses and air emission sources. | To avoid confusion, **Section 2.4** has been rewritten as follows:<br>According to the Hong Kong Planning Standards and Guidelines (HKPSG), areas designated for active or passive recreational uses should be located 5 to 20 m away from road traffic. Since only minor roads are within 20 meters of the site boundary, potential air quality impacts from nearby road traffic are expected to be limited.<br><br>Conversely, areas for active or passive recreational uses should be situated 10 to 200 m away from industrial chimneys. Given that multiple industrial chimneys are located within 200 m of the site boundary, the primary concern for the air quality of the proposed development arises from these nearby industrial chimneys. |

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| 9. Table 3-2: The format of the footnote marker (e.g. [ii] and [4]) should be consistent. Please revise. | Revised accordingly. |
| 10. Section 4.3.1: Please replace "dark smoke" in Line 2 to "particulates". | **Section 4.3.1** has been revised accordingly. |
| 11. Section 4.3.6: Dust reduction measures should be implemented during the construction phase. Please revise. | **Section 4.3.6** has been revised as follows to avoid confusion.<br><br>In accordance with the Air Pollution Control (Construction Dust) Regulation, contractors and site agents are obligated to inform the EPD and implement dust reduction measures to minimise dust emissions throughout the construction phase, including demolition, site formation, foundation construction, and superstructure construction. |
| 12. Section 5.1.2: To substantiate that the scale of construction activities of this Project will be limited, please provide information on the size of the site formation or excavation area, the volume of excavated materials to be managed, the maximum number of construction trucks and mechanical equipment to be deployed at the worksite at any given time, and etc. | Due to the small gross site area (964.2m$^2$), the scale of construction activities for the Project will be limited. The Site currently houses a 2-storey industrial building, and the demolition works are considered minor, as only a single low-rise development is involved. It is important to note that excavation for the basement is required for the entire Site, with an excavation depth of ~10 meters. This is expected to generate ~9,642 m$^3$ of inert C&D material (calculated as 964.2 m$^2$ x 10 m). The maximum number of Powered Mechanical Equipment (PME), including trucks, expected to be deployed at the worksite is 8, excluding small plants such as water pumps and fans.<br><br>**Section 5.1.2** and **Table 5-1** have been revised accordingly. |

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| 13. Section 5.3.1: Office areas, if present within industrial buildings, should be classified as air-sensitive uses. Please review and revise this Section and Table 5-2 accordingly. | Industrial development is considered ASRs in the current assessment. **Sections 2.3.5, 5.3.1, Table 5-2,** and **Figure 5-1** have been revised accordingly. |
| 14. Section 5.4.1: Please provide the maximum number of PME to be deployed at the worksite at any given time to demonstrate that it will be limited. | The number of PMEs expected to be used on-site will be limited to a maximum of 8. As a result, no significant impact is anticipated from the operation of PME. **Section 5.4.1** has been revised accordingly. |
| 15. Section 5.4.3: In addition to the demolition of the existing structure, please identify all potential dust emission sources during the construction phase. | Sources of dust during the construction phase include demolition, foundation and superstructure construction activities, as well as the handling and transportation of temporary stockpiles, dusty materials, excavated materials, and concrete production.<br>Additionally, particulates emitted from plant equipment could pose a concern if not properly mitigated. The exposed earth after the completion of work may also serve as a potential dust source. **Sections 5.4.3 - 5.4.5** have been revised accordingly. |
| 16. Section 6.1.1:<br><br>- Please provide information on the operation of the data center to justify that no air pollutant emissions will be generated from the proposed development.<br><br>- Please clarify whether routine running tests on emergency generator(s) would be conducted. If yes, air pollutant emissions are expected and their potential air quality impacts should be reviewed as mentioned in our comments on Section 2.2.2 above.<br><br>-Please confirm whether the proposed development has no openable windows and relies exclusively on fresh air intakes for ventilation. | The proposed development is intended solely for data centre use and will operate exclusively on electricity supplied by CLP.<br><br>As stated in **Sections 2.2**, 16 backup generators powered by diesel fuel, with a total capacity of 28,000 kW, will be installed. Routine testing of each backup generator will be conducted sequentially for 30 minutes each month, which may pose a potential source of air quality impact.<br><br>Since the backup generators and exhaust chimneys require a Specified Process license, it is expected that the potential impact will be mitigated to an acceptable level prior to the approval of the Air Pollution Control Plan (APCP) and issuance of the license. |

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| | Therefore, the proposed development is not expected to induce adverse air quality impacts during the operation phase.<br><br>Based on the current tentative layout, only the management offices and data halls in the proposed development are considered ASRs, as stated in **Section 2.2**. To ensure air quality in these areas during operation, they are designed as confined spaces and will rely exclusively on fresh air intakes for ventilation. The potentially polluted air from outside is not expected to enter the management offices and data halls. Therefore, it is necessary to identify suitable locations for the fresh air intakes.<br><br>**Sections 6.1.1 – 6.1.5** have been revised accordingly. |
| 17. Section 6.2.2: Please add "more than" before "5 m" in Line 2. | **Section 6.2.2** has been revised accordingly. |
| 18. Table 6-1: Please indicate the reference sources for chimney height and horizontal separation distances. | The height and location of the chimneys were estimated from the building footprint derived from the Digital Topographic Map iB1000, measurements from Open3Dhk, and site observations. Please refer to **Appendix 2-2** for details. **Tables 2-1, 6-1, and Appendix 2-2** have been revised accordingly. |
| 19. Section 6.2.4: The meaning of the last sentence is unclear. Please consider removing this sentence and clearly state that all industrial chimneys within 200 m from the application site boundary have been identified. Same comment applies to the second sentence of Section 6.3.2. | **Sections 6.2.4** and **6.3.2** have been revised accordingly. |
| 20. Section 6.3.2:<br><br>-Please add "intake" after "air" in Line 3. | It should be noted that only the management offices and data halls in the proposed development are considered as ASRs, as stated in **Sections 2.2** and **6.1.5**. To avoid confusion, management offices and data halls have been |

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| - In the last sentence of Section 6.3.2, please clarify whether openable windows will be provided in the proposed development. If yes, please provide the following information:<br><br>(i) the definition of "areas with air-sensitive uses" and their locations indicated on the map;<br><br>(ii) verification of whether "areas with air-sensitive uses" are confined spaces (e.g., without any openable windows and with doors consistently closed) and rely exclusively on fresh air intakes for ventilation;<br><br>(iii) the definition of "non-normally occupied areas" and confirmation of whether staff will work within these areas, including the maximum frequency and duration of such occupancy; and<br><br>(iv) confirmation of whether the polluted air entering "non-normally occupied areas" through the windows could affect "areas with air-sensitive uses". | listed in **Section 6.3.2**, instead of the "areas with air-sensitive uses".<br><br>The definitions of "not normally occupied spaces" or "unoccupied spaces" have been relocated to **Sections 2.2.8** to **2.2.10** & **6.1.5**, and removed from **Section 6.3.2** to avoid confusion.<br><br>It should be noted that the ASRs of the proposed development, namely the management offices and data halls, are designed as confined spaces and will rely exclusively on fresh air intakes at suitable locations for ventilation, as mentioned in **Section 2.2.10**. The potentially polluted air outside is not expected to enter the management offices and data halls.<br><br>As the current layout is tentative, the locations of the management offices and data halls are subject to change. Indicating their locations on the layout may not account for potential changes to the ASRs in later designs. Therefore, the following sentence has been added.<br><br>If any additional ASRs are identified in the proposed development at a later stage, those areas should receive the same treatment as the management offices and data halls.<br><br>**Section 6.3.2** has been revised accordingly. |
| 21. Section 6.3.4: Please add "adverse" before "air quality" in Line 2. | **Section 6.3.4** has been revised accordingly. |
| 22. Section 6.4.1: Please provide information on the emergency generators, such as the number of gen sets, their installed capacity, the routine test schedule, the estimated annual operating time based on past experience, and etc.. | Details on the emergency generators are provided in **Sections 2.2.2** to **2.2.7** and again in **Section 6.1.2**.<br><br>Therefore, only a summary of the information has been supplemented in **Section 6.4**. |

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| 23. Figure 6-1, 6-3a–g: Please add a remark to state that "no air-sensitive uses, including openable windows, fresh air intake of mechanical ventilation and recreational uses in the open area, would be located within the buffer zones". | The remark has been added to **Figures 6-1, 6-2a** to **6-2e, and 6-3a** to **6-3g**. |
| 24. Figure 6-2a: Please review whether an "overall" figure is necessary, as the different buffer distance requirements for industrial chimneys vary based on the height differences between the chimney exit and the ASRs. | The figure has covered the function of the "overall" figure (**Figure 6-2a**) for 59mPD to 109.55mPD (**Figure 6-2f**).<br><br>Therefore, **Figure 6-2a** has been removed and the previous **Figures 6-2b** to **6-2f have been renamed to Figures 6-2a** to **6-2e**. **Table 6-2** and **Section 6.2.4** have been revised accordingly. |
| 25. Appendix 2.2:<br>- Please indicate the dates on which site surveys were conducted.<br>- Please explain the methodology used to obtain information such as horizontal separation distances and chimney heights. | The dates on which site surveys were conducted have been supplemented in **Appendix 2-2**.<br><br>The methodology used to obtain information, such as horizontal separation distances and chimney heights, is supplemented in **Appendix 2-2**. |
| ***Revised Planning Statement (PS)***<br><br>26. Section 3.3: Please update according to the comments provided for the AQIA above. | Please refer to the revised pages 8 and 9 of the Planning Statement (PS) in **Attachment 3**. |
| 27. Section 4.4.1: Please repeat the current status of the existing industrial building in Section 2.1.2 of AQIA. | We have revised descriptions of its status in **Section 4.4.1**. Please refer to revised page 13 in **Attachment 3**. |

**Enclosures**

1. **Attachment 1** – Replacement Page 3 and Figures 1 to 10 of the VIA Report
2. **Attachment 2** – Replacement Pages, Figures and Appendix 2.2 of the AQIA Report
3. **Attachment 3** – Replacement Pages 8, 9 and 13 of the Planning Statement