

Responses-to-Comments

**Proposed Temporary Concrete Batching Plant for a Period of 5 Years
in “Industrial (Group D)” Zone, Lot 153 (Part) in D.D. 77, Ping Che, New Territories**

(Application No. A/NE-TKL/795)

- (i) Revised planning statement, plans and appendices are provided for consideration (**Annexes I to VI** and **Plans 1 to 2**).
- (ii) A RtoC Table:

Departmental Comments		Applicant's Responses
1. Comments of the District Planning Officer/Shu Tin, Tai Po and North, Planning Department (DPO/STN, PlanD) (Contact Person: Ms. Sheren LEE; Tel: 2158 6391)		
(1)	Para 5.2 of PS and Plan 6 Please clarify if concrete mixer and office are also one of the proposed facilities at the Site. With reference to Plan 6, please clarify where the tube ice maker/storage, generator room and slump stand. For Plan 6, it is noticed that there are a number of facilities being indicated as ‘inaccessible roof’. Please clarify if there is any facility underneath the ‘inaccessible roof’, if yes, please indicate the facility on the plan.	Please be confirmed that concrete mixer and office are also one of the proposed facilities at the application site (the Site). Please refer to the revised plan indicating the location of ice maker/storage, generator room and slump stand for details. The facilities under the ‘inaccessible roof’ are also indicated in the layout plan for reference (Plan 2).

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(2)	<p>Para 2.6 of PS</p> <p>Please substantiate with the history of the site i.e. the Site was used as a factory for manufacturing concrete products and was subsequently evolved into the existing CBP.</p>	<p>The Site was used as a factory of manufacturing concrete product and formed part of the subject of a Short Term Waiver (STW) No. 863 for a factory for manufacturing concrete products with ancillary open storage use in 1990. As the market evolved and demand shifted, the factory underwent a transformation. Over the years, advancements in technology and changes in production methods led to the development of the current Concrete Batch Plant (CBP). This transition allowed the Site to adapt to modern construction needs, focusing on efficiency and sustainability while continuing to support the local construction materials industry.</p>
(3)	<p>Para 4.6 of PS</p> <p>Please clarify that based on the land survey, the Site falls solely on private lot despite a small portion encroaches onto Government land on the latest survey sheet. Besides, please clarify if you have applied to LandsD to update the lot boundary on the survey sheet according to your land survey result, if yes, what's the status of such updating.</p>	<p>Detailed survey was conducted to delineate the lot boundary, i.e. Lot 153 in D.D. 77. The Site consist of 1 private lot with private land area of 6,957 m² (about) of Old Schedule Lot held under Block Government Lease.</p> <p>On 16.12.2024, the submission of Land Survey Report prepared by authorised surveyor, including the Survey Record Plan and Land Survey Plan of Lot No. 153 in D.D. 77 was sent to Buildings Department and Lands Department for retention (Annex II).</p>
(4)	<p>Para 5.5 of PS</p> <p>Please clarify if Phase 2 development includes the relocation of loading/unloading of light goods vehicle, some of the private car</p>	<p>For Phase 2 development, it includes the relocation of 2 private car parking spaces, 1 L/UL space for light goods vehicle and 10 waiting spaces for heavy</p>

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	parking spaces and heavy goods vehicle waiting spaces from Phase 1, provision of aggregate storages and vehicle cleaning facilities, as well as the conversion of the vacated area in Phase 1 area into an office, a repairing shed and equipment storage.	goods vehicles from Phase 1 development, provision of aggregate storages and vehicle cleaning facilities, as well as the conversion of the vacated area in Phase 1 development into an office, a repairing shed and structure for equipment storage.																	
(5)	<p>Table 3 of PS</p> <p>Please supplement with the plot ratio and site coverage for Phase 1, and if the calculation of GFA of Phase 2 includes the aggregate storages and vehicle cleaning facilities as well as the office, repairing shed and equipment storage at the vacated area of Phase 1.</p>	<p>Details of development parameters of Phase 1 are shown at table below:</p> <table><tr><th colspan="2">Phase 1 Development</th></tr><tr><td>Area of Each Phase</td><td>5,197 m² (about)</td></tr><tr><td>Total GFA</td><td>1,506 m² (about)</td></tr><tr><td>- Domestic GFA</td><td>Not applicable</td></tr><tr><td>- Non-Domestic GFA</td><td>1,506 m² (about)</td></tr><tr><td>Plot Ratio</td><td>0.29</td></tr><tr><td>Site Coverage</td><td>22%</td></tr><tr><td>Building Height</td><td>Not exceeding 13 m</td></tr></table> <p>Please be confirmed that the GFA calculation of Phase 2 development (i.e. total GFA of 1,270m²) already included the aggregate storages, vehicle cleaning facilities, office, repairing shed and equipment storage.</p>		Phase 1 Development		Area of Each Phase	5,197 m ² (about)	Total GFA	1,506 m ² (about)	- Domestic GFA	Not applicable	- Non-Domestic GFA	1,506 m ² (about)	Plot Ratio	0.29	Site Coverage	22%	Building Height	Not exceeding 13 m
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(6)	<p>Para 5.9 of PS, TIA</p> <p>(a) in the PS, it mentions that the road improvement scheme includes “the provision of passing bays and 2 m wide footpath along the local access between Ping Yuen Road</p>	<p>(a) Please be clarified that the implementation of road improvement works including provision of new development access to connect the local access road and the application site, provision of road markings along Ping Yuen</p>																	

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	<p>and the Site"; whereas in the TIA, it reads that "...works for passing bays (passing bay extension and repave an area as indicated in Figure 2-2) would be implemented along the access road between Ping Yuen Road and the Application Site". Please tally the wordings to avoid confusion.</p> <p>(b) in the PS, it reads that "...provision of road markings along Ping Yuen Road and the local access", while in the TIA, it reads that road markings would also be added along Ping Yuen Road". Please tally.</p> <p>(c) Please clarify if the applicant undertakes that the operation of the proposed use will only commence after the implementation of the road improvement works proposed under the current application.</p>	<p>Road, works for passing bays (passing bay extension and repaving an area on the local access road), and a new 2 m wide footpath along the local access road between Ping Yuen Road and the application site to address vehicular and pedestrian safety concerns</p> <p>(b) Please be clarified that the road markings would be added along Ping Yuen Road.</p> <p>(c) Please be confirmed that the proposed development will only commence after the implementation of the road improvement works proposed under the current application.</p>
(7)	<p>Para 5.10 and EA</p> <p>Please clarify if the applicant will apply to the EPD for a Specified Process (Cement Works) License and Discharge Licence upon approval of the current application.</p>	<p>The applicant will apply for the Specified Process (Cement Works) Licence and Discharge Licence upon approval of the current application.</p>
(8)	<p>Table 3-10 and Figure 3-2 of EA</p> <p>It reads that "A proposed 4m barrier (minimum surface density of 10kg/m²) at the site boundary (northern, eastern and southern boundary). Nonetheless, based on the plan, the site is</p>	<p>Please be confirmed that the Site will be completely surrounded by the proposed 4m barrier (minimum surface density of 10kg/m²) except for the ingress and egress. Please refer to the revised EA for details (Annex III).</p>

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	completely surrounded by the 4m barrier except for the ingress and egress. Please clarify.	
(9)	It is noted that the traffic consultant of the applicant, OZZO Technology (HK) Ltd., submitted a technical note on '2040 Traffic Forecast for Environmental Assessment Study' to TD for endorsement as requested by EPD. Please liaise with the traffic consultant and submit the endorsed submission dated 9.5.2025 to TPB.	The endorsement letter from TD is provided (Annex IV).
(10)	<p>Para. 5.3 of PS</p> <p>Please review if the sentence "The CBP operation consists of a 12-hour concrete collection and delivery of raw materials period between 07:00 to 19:00, and concrete production only period beyond peak hours between 19:00 and 23:00." is in order, as it appears that if the concrete is only produced at night, while the concrete collection and delivery will only begin at 7 a.m., the concrete will not be delivered to the construction sites when they are freshly produced.</p>	Please be clarified that the operation hours of the proposed development are from 07:00 to 23:00 daily, including public holiday, which consist of a 16-hour concrete production and delivery period between 07:00 and 23:00, and a 12-hour raw material delivery period between 07:00 and 19:00. No delivery of raw materials will take place during the time between 19:00 and 23:00. The use of aggregate trucks will only take place between 07:00 and 19:00 per day.
(11)	<p>Para. 5.9 of PS, para. 2.5.1 of TIA and Plan 8</p> <p>Please clarify if the applicant has already obtained consent from the relevant lot owners of the proposed access road (i.e. Lots 158 RP, 157 RP, 155 RP and 154 in D.D. 77). Besides, please tally the</p>	Please note that the applicant is the sole lot owner of the concerned lots 155 RP, 157 RP and 158 RP in D.D. 77, and consent of the right of way of Lot 154 in D.D. 77 has been obtained by the applicant in December 2024.

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	wordings used in the PS, TIA and Plan 8 on new proposed access road / new development access.	The Site is accessible from Ping Che Road via Ping Yuen Road and a local access (Plan 1 and Annex I).
2. Comments of the Director of Environmental Protection (DEP)		
Comments received on 19 May 2025		
(1)	Paragraph 1.1.2: Please explain what amendment has led to this change and explain the difference of capacity involved.	<p>A clarification note showing the comparison between existing and proposed CBP, as well as the environmental benefits is provided by the applicant (Annex III).</p> <p>The change to the silo capacity has been moved to a new para. 1.1.3 for better presentation. The amendment has been elaborated in para. 1.1.3. In addition, one more reason for increasing the silo capacity due to reducing the need of delivery cementitious materials during peak hours has been provided.</p>
(2)	Section 2: Please compare the proposed CBP with the approved case as in A/NE-TKL/681 and discuss whether the improvement measures discussed in Section 2 have already considered in the approved A/NE-TKL/681.	Noted. Please refer to the revised para. 2.1.1 for details.
(3)	Table 2-1: Please quote and compare other design parameters from both of the approved and proposed developments, such as production rate of concrete and aggregate storage capacity or size.	Noted. Please refer to the amended Table 2-1 for details.
(4)	Paragraph 2.1.2 Point 1: Please compare the number of trucks per day required for delivery in the approved and proposed designs.	Para. 2.12 has been moved to para. 2.2.1 . Increase in silo capacity can reduce the need of delivery cementitious material during peak hours. Because hourly flows are required for air modelling, the daily trips of delivering cementitious

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		<p>materials were not provided in the previous and current planned CBP applications.</p> <p>Nevertheless, the maximum vehicle movements have been provided in the revised Table 2-1 showing fewer aggregate trucks to be required for the current planned CBP compared with the previous planned CBP.</p> <p>Please refer to the revised Table 2-1 for details.</p>
(5)	Paragraph 2.1.2 Point 2: Please clarify whether the aggregate discussed involves those with a nominal size less than or equal to 5 millimeters. Please indicate the location of the locations of the enclosures on a figure.	<p>Para. 2.1.2 has been moved to para. 2.2.1. For the storage of aggregates with sizes of less than or equal to 5mm and larger than 5mm, all these sizes of aggregates will be stored at the ground storages enclosed with 3-sides and top, and front curtain, in addition to the enclosed overhead aggregate bin.</p> <p>Please refer to the revised Table 2-1 for details.</p>
(6)	Paragraph 2.1.2 Point 3: Please provide the design detail for the “more effective vehicle washing facilities”, such as what would be improved on this proposed development.	<p>Para. 2.1.2 has been moved to para. 2.2.1.</p> <p>Please refer to the revised Bullet Point 3 of para. 2.2.1 for details.</p>
(7)	Paragraph 2.1.2 Point 6: Please quote the emission limit state in BPM 3/2 (2025).	Noted and the limit of 10mg/m ³ has been added.
(8)	Paragraph 2.1.2 Point 7: Please provide the supporting document that the control efficiency is achievable by the design of the dust collector.	Noted. Please refer to the page extracted from the dust collector catalogue in Appendix 1 for details.

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(9)	Please also discuss the air quality impact during the demolition and reconstruction of the CBP.	Noted. Please refer to the new Section 2.3 for details.
(10)	Please compare the overall change in the dust emission amount in the new design.	Please refer to the revised Table 2.1 .
(11)	Please identify the ASRs around the proposed CBP.	Please refer to the new Section 2.4 including Table 2-2 and Figure 2-1 for details.
Waste Management and Land Contamination Perspective		
(1)	<p>Para. 5.1.1</p> <p>Since this is a private project, the Consultant shall review the relevance of the guidelines and standards, such as (i) CEDD TC No.11/2019, Management of Construction and Demolition Materials and (ii) ETWB TCW No. 19/2005, Environmental Management on Construction Sites, and remove them accordingly to avoid confusion.</p>	Removed accordingly. Please refer to the revised Environmental Assessment Report (Annex III).
(2)	<p>Section 5</p> <p>This chapter does not include the assessment methodology for reviewing the waste management implications during the construction and operational phases. The Consultant shall incorporate an additional section after describing the relevant environmental legislation and standards (i.e., Section 5.2)</p> <p>The assessment methodology shall include but not limited to (i) identification/estimation of the types and quantities of waste</p>	Noted. Section 5 has been revised.

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	<p>arising from the Project; (ii) addressing impacts caused by handling (including stockpiling, labelling, packaging and storage), collection, transportation and reuse/disposal of wastes in detail and propose appropriate mitigation measures; (iii) adoption of waste management hierarchy with priorities towards waste reduction, on-site or off-site reuse and recycling; (iv) estimation of the types and quantities of wastes required to be disposed of and their disposal method; and (v) assessment of the impacts on the capacity of waste collection, transfer and disposal facilities.</p>	
(3)	<p>Para. 5.2.1</p> <p>(a) Please clarify whether site clearance and excavation works are anticipated for this Project.</p> <p>(b) Please clarify whether yard waste shall be identified as part of the non-inert C&D materials.</p> <p>(c) Please revise “surplus soil” to “excavated soil” in the first bullet.</p> <p>(d) Please review and clarify whether asbestos is anticipated in this Project. If not, the Consultant shall update the third bullet to avoid confusion.</p>	<p>(a) Site clearance and minor excavation work is anticipated. Subsection of inert material has been revised.</p> <p>(b) No yard waste is anticipated which is described in Para. 5.2.14.</p> <p>(c) “Surplus soil” has been revised to “excavated soil”.</p> <p>(d) No asbestos is anticipated. The third bullet has been revised.</p>
(4)	<p>Para. 5.2.3</p> <p>(a) Please clarify whether site clearance and excavation works are anticipated in this Project.</p>	<p>(a) Site clearance and minor excavation work is anticipated as Subsection of inert material has been revised.</p>

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	(b) The Consultant is advised to map out the location and extent of two phases and individually elaborate on their construction activities and associated quantity estimation.	(b) Figure 5-1 has been added and Para 5.2.3 has been revised.
(5)	<p>Para. 5.2.4 and Para. 5.2.8</p> <p>(a) Although the quantity of C&D materials will not be significant, the Consultant is advised to provide a rough estimation</p> <p>(b) Please supplement this Project's excavation extent (i.e., area and depth) to facilitate vetting.</p>	<p>(a) A rough estimation has been incorporated into Para 5.2.3 to Para 5.2.13.</p> <p>(b) Para 5.2.5 has been supplemented excavation information.</p>
(6)	<p>Para. 5.2.5</p> <p>(a) Considering that the Project does not require site formation, the Consultant shall review and clarify the relevance of the cut-and-fill requirement in this Project. Please update the first sentence to avoid confusion.</p> <p>(b) Please revise "ill Bank" to "Fill Bank" to avoid confusion.</p> <p>(c) Please specify that the destination of inert C&D materials is subject to the designation by the Public Fill Committee according to DEVB TC(W) No.6/2010.</p>	<p>(a) As there will be no cut and fill, the requirement is removed.</p> <p>(b) Revised accordingly.</p> <p>(c) Para 5.2.7 has been supplemented the destination.</p>

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<p>(7) Para. 5.2.8</p> <p>The Consultant shall clarify whether yard waste is anticipated arising from the construction activities. If affirmative, they are required to be handled in accordance with the principles of reduce, reuse, and recycle (3Rs). The following guidelines have to be taken into account when handling yard waste:</p> <ul style="list-style-type: none"> • Relevant guidelines posted by EPD through EPD's website (https://www.epd.gov.hk/epd/english/environmentinhk/waste/manage_facility/ypark.html) and Y Park's website (https://www.ypark.hk/zh-hant/). • "Guidelines on Yard Waste Reduction and Treatment" issued by Development Bureau; and • "Development Bureau Technical Circular (Works) No. 4/2020 Tree Preservation"; <p>Specifically, to minimize the generation of yard waste, the project proponent shall:</p> <ul style="list-style-type: none"> • Avoid unnecessary removal or excessive pruning of trees. Preserve trees in their original locations and implement tree transplanting when on-site preservation is not feasible. • Segregate various types of yard waste and shred wood to facilitate reuse and recycling. • Reuse yard waste on-site for a variety of purposes (e.g., decomposition and composting, recreational and decorative uses, and mulching in planting areas, etc.). 	<p>Para 5.2.14 has been added to clarify that no yard waste is anticipated.</p>

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	<ul style="list-style-type: none"> Identify recycling options (e.g. delivery to Y-park) for yard waste that cannot be directly reused on-site. 	
(8)	<p>Para. 5.2.10 to Para .5.2.12</p> <p>The content in these paragraphs covers chemical waste (duplicated with Para. 5.2.13 to Para.5.2.15), which does not tally with the sub-title "General Refuse". The Consultant shall carefully review and update as appropriate.</p>	Paragraphs are revised.
(9)	<p>Para 5.2.13</p> <p>(a) The amount of chemical waste to be generated shall be quantified in the Waste Management Plan (WMP) as part of the Environmental Management Plan (EMP) to be prepared by the Contractor.</p> <p>(b) According to Para. 5.2.1, asbestos is identified as chemical waste to be generated during this Project. The Consultant shall supplement and elaborate on such description.</p>	<p>(a) Noted.</p> <p>(b) No asbestos is confirmed. Please refer to Para. 5.2.24.</p>
(10)	<p>Para. 5.2.14 and Para .5.2.18</p> <p>Please revise "licensed collector" and "licensed chemical waste collector".</p>	Para 5.2.23 and Para 5.2.26 have been revised accordingly.

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(11)	<p>Para. 5.2.16 and Para. 5.2.17</p> <p>(a) Please be advised that MSW comprises domestic and C&I portions of general refuse. The Consultant shall review whether it should be referred to as "general refuse" to avoid confusion and overestimation. Please carefully review and update the entire submission for consistency.</p> <p>(b) For clarity, please estimate the quantity of general refuse anticipated during the operation phase.</p>	<p>(a) Revised as MSW for Para of General Refuse.</p> <p>(b) The estimation has been added into Para 5.2.17 and Para 5.2.18 for construction phase and Para 5.2.28 and Para 5.2.29 for operation phase.</p>
(12)	<p>Para. 5.2.19</p> <p>The Consultant shall provide an estimation of the quantity of cementitious cake to be generated during the operation phase.</p>	<p>The estimation has been added into Para 5.2.32.</p>
(13)	<p>Para. 5.2.20</p> <p>Please review and clarify the relevance of domestic waste to this Project.</p>	<p>Para 5.2.36 has been revised.</p>

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(14)	<p>Para. 5.3.2</p> <p>(a) Please revise “public fill” to “public fill reception facilities” to avoid confusion.</p> <p>(b) Since surplus inert C&D materials will be delivered to Public Fill Reception Facilities for beneficial reuse in other projects, please avoid using the terms "dispose" and "disposal" in this connection. Please thoroughly review and update the entire submission.</p>	<p>(a) Para 5.3.2 has been revised accordingly.</p> <p>(b) Noted. Para 5.3.2 has been revised accordingly.</p>
(15)	<p>Para. 5.3.13</p> <p>Please supplement the control measures for stockpiling and management of C&D materials during inclement weather (e.g., heavy rain or typhoon)</p>	The relevant control measures have been supplemented to Para 5.3.13 .
(16)	<p>Para. 5.3.16</p> <p>Please clarify whether waste management hierarchy principles will be followed in descending order of preference.</p>	Para 5.3.16 has been revised.
(17)	<p>Para. 5.2.20</p> <p>Please review and clarify the relevance of domestic waste to this Project.</p>	Para 5.2.33 has been revised.
(18)	<p>Section 6.2</p> <p>The Consultant is advised to briefly elaborate on the assessment methodology for the land contamination assessment. The Consultant is advised to elaborate further and describe the</p>	Noted. Section 6.2 has been updated.

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<p>requirements and assessment methodology for land contamination issues. It is required to confirm with documentary justifications to substantiate whether there is any potential land contamination issue arising from the past and present land use activities on the proposed development site through desktop review and site survey (e.g., site's land use history, aerial photos, site visit photos, spillage records, potential contamination sources, etc.). Subject to the assessment outcome, the Contamination Assessment Plan (CAP) and, subsequently, the Contamination Assessment Report (CAR) and Remediation Action Plan (RAP) may be required in later stages to identify the potential land contamination issues in the Subject Site. The land contamination assessment and remediation works shall be completed according to EPD guidelines before any construction works.</p>	
<p>(19) Para. 6.3.1 and Table 6-1 In addition to those identified within this project's scope of works, the Consultant is also advised to review whether land contamination issues may arise from off-site properties immediately adjacent to the Project Site.</p>	<p>Off-site conditions are also identified. The para and table are revised.</p>
<p>(20) Section 6.3 In addition to reviewing historical aerial photographs, the Consultant is advised to evaluate the land contamination potential using information, including, but not limited to, records</p>	<p>Since no change to the current land use since the approved CAP, the findings as in the approved CAP are still valid.</p>

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	from EPD and FSD, as well as site walkover and associated photographic records.	
(21)	<p>Para. 6.3.3</p> <p>(a) Please clarify the relevance of the CAP approved on 18 April 2023 as well as the project scope between the two projects (i.e., (i) CAP in 2023 and (ii) this submission).</p> <p>(b) Please supplement the extract of the approved CAP for further vetting of its findings and relevance.</p>	<p>(a) Further clarification is added in the Para. 6.3.3.</p> <p>(b) The approved CAP is attached in Appendix H.</p>
(22)	<p>Section 6.4</p> <p>Please be advised that reviewing aerial photographic records is only part of the site appraisal. The Consultant shall evaluate the land contamination potential in full. We reserve the right to offer further comment on the submission.</p>	Noted.
Sewerage Impact Assessment		
(23)	<p>Section 2 of SIA</p> <p>According to para 4.4.3 (last bullet) of Environmental Assessment submitted under this planning application, foul water from the construction site office, site canteen or site toilet will be directed to a foul sewer or to a sewage treatment and disposal facilities either directly or indirectly by means of pumping. Therefore, please also assess the sewerage impact during construction stage of the Project.</p>	<p>Revised sewerage impact assessment report is provided for consideration (Annex V).</p> <p>Discussion on sewerage impact during construction stage has been supplemented in Section 2.2.</p>

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(24)	<p>Figure 2-1 of SIA</p> <p>It is noted that the proposed alignment of the new sewers crosses 3 private lots. Please be reminded that consent from relevant lot owners should be sought before connecting to public sewer.</p>	Noted.
(25)	<p>Table 3-1 of SIA</p> <p>Please provide justification for using 0.23m³/day/staff (i.e. commercial employee + J9 Construction) as the UFF of staff, e.g. referring to the past record of the existing concrete batching plant. Otherwise, please adopt the UFF of 0.63 m³/day/staff (i.e. industrial employee + J1 manufacturing in North District) and reassess the sewerage impact accordingly.</p>	<p>During the operation of the Proposed CBP, surface runoff will be collected by peripheral drainage system and diverted to sedimentation tank or silt removal prior to on-site reuse. The sewerage discharge during operation is mainly sewage/ grey water from toilets used by on-site staff. In addition, the same UFF was also adopted in previously approved SIA report for the Proposed CBP (i.e. A/NE-TKL/681).</p> <p>Considering the nature of CBP and the insignificant amount of industrial discharge, UFF of commercial flow is adopted instead of industrial flow for estimating the sewage discharge of on-site staff. Therefore, UFF of 0.23m³/day/staff (i.e. commercial employee + J9 Construction) shall be kept for the assessment.</p>
(26)	<p>Section 4 of SIA</p> <p>Please recommend the preferred option with the following considerations:-</p> <p>(a) The sewage handling strategy adopted in the existing concrete batching plant;</p>	<p>Option 1 (i.e. sewage to be discharged into the public sewerage system) is the preferred option over Option 2. However, the applicant is still undergoing consent issues with lot owners as the proposed sewer connecting the terminal manhole and the nearest foul manhole will cross some private lots. As such, Option 2 (i.e. sewage to be tankered away) is provided in the report as a backup option in case agreement could not be obtained from private lot owners.</p>

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	(b) Please be advised that the downstream sewerage of the proposed concrete batching plant is upgrading under PWP No. 4409DS and the tentative completion date of the upgrading works is mid 2027 (i.e. after the commissioning year of this Project, 2025). If option 1 is recommended, please critically review whether the spare capacities of the existing SPSs are sufficient to cater the sewage generated from the proposed concrete batching plant and propose mitigation measures if applicable. Also, please provide the contingency sewage discharge plan to ensure no sewerage/environmental impacts will be arisen.	Considering the insignificant amount of sewage will be generated from the Proposed CBP (i.e. 5.4 m ³ /day), the existing SPSs shall be capable to cater for the additional generation and no adverse impact on the existing SPSs is therefore anticipated.
(27)	Appendices B, C and D of SIA (a) Please refer to comment item 3 and update the calculations if applicable. (b) For sections A2, A3, A4, C2, D1, F1 and G1 under Appendix B, please revise "Unit flow factor (UFF) per resident staff".	(a) UFF of 0.23m ³ /day/staff shall be adopted as justified above and therefore no update for the calculations. (b) Appendix B has been revised accordingly.
(28)	Environmental Assessment (para 4.3.6, 4.5.3, 7.4.2 and Table 7-1) Please refer to comment item 26 and update the relevant content in the Environmental Assessment accordingly.	No update for the EA report.

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Water Quality Perspective		
(29)	Section 4.1 (a) Please revise the header to “Environmental Legislation, and Standards and Guidelines”. (b) Please include Hong Kong Planning Standards and Guidelines (HKPSG) Chapter 9 and supplement a sub-section for it.	(a) Revised accordingly. (b) HKPSG has been supplemented in Para. 4.1.5 .
(30)	S4.1.1 (a) “The Technical Memorandum – Standards for Effluent Discharged into Drainage and Sewerage Systems, Inland and Coastal Waters (“WPCO-TM-TM-DSS”) is issued under Section 21 of the Water Pollution Control Ordinance (“WPCO”). All discharges into government sewerage systems, marine and inland waters are required to comply with the standards stipulated in the WPCO-TM-TM-DSS . Specific limits applied for different areas and are different between surface waters and sewers, and the limits vary with the rate of effluent flow. Any effluents discharged from the Project during the construction and operation stages should comply with the relevant standards as stipulated in the TM-DSS and are specified in license conditions for any new discharge. WPCO also provides the main statutory framework for the protection and control of water quality in Hong Kong, such as setting Water Quality Objectives (“WQOs”) for each of the ten Water Control Zones (WCZs”) According to the Ordinance and its	(a) Revised accordingly.

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	<p>subsidiary legislation, the entire Hong Kong waters are divided into ten Water Control Zones (WCZs) and four supplementary WCZs. Corresponding statements of Water Quality Objectives (WQOs) are stipulated for different water regimes (marine waters, inland waters, bathing beaches subzones, secondary contact recreation subzones and fish culture subzones) in each of the WCZs to protect specific beneficial uses and conservation goals of each of the zones.”</p> <p>(b) Please state which WCZ the Project is located within and provide the corresponding WQOs.</p>	<p>(b) Description of WCZ has been mentioned in Para. 4.2.1. WQOs for Deep Bay WCZ has been supplemented in Table 4-1.</p>
(31)	<p>S4.1.2</p> <p>“With reference to Professional Persons Environmental Consultative Committee (“ProPECC”) Practice Note on Construction Site Drainage (“ProPECC PN2/24”),.....”.</p>	Revised accordingly.
(32)	<p>S4.1.3</p> <p>Please advise if the Project consists of restaurant kitchen. If no, please remove it from the paragraph.</p>	No restaurant kitchen will be provided for the Proposed CBP. Para. 4.1.3 has been revised.
(33)	<p>Table 4-1</p> <p>Please identify all the WSRs by making reference to the Environmental Database Central Portal (e.g. pond, watercourses at the North/Northwest of the Project Site) and update Figure 5.1 accordingly.</p>	Noted. Table 4-1 and Figure 4-2 have been updated accordingly.

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(34)	<p>S4.3.2</p> <p>“Wash water from vehicles and equipment; silt from any on-site stockpiles of soil, cement and grouting materials; and spillage of fuels, oil and lubricants from construction/reinstatement vehicles and plant may generate water quality impacts; demolition of the existing plant.”</p>	Revised accordingly.
(35)	<p>S4.3.3</p> <p>Please characterize the sewage generated by construction workforce and evaluate the impacts.</p>	Para. 4.3.3 has been further supplemented.
(36)	<p>S4.3.5</p> <p>Please also evaluate the water quality impacts from other non-point/diffuse source pollution, such as dust, tyre scraps, oil, washed from the paved roads during rainstorm.</p>	Para. 4.3.5 has been further supplemented.
(37)	<p>S4.3.6</p> <p>(a) Please provide a brief summary of findings in SIA.</p> <p>(b) “Another major source of sewage/wastewater during operation phase would be sewage and grey water from toilets used by on-site staff. A separate Sewerage Impact Assessment (“SIA”) has concluded that there will be no adverse water quality impact/sewerage impact arising from the Proposed Development.”</p>	<p>(a) Findings of SIA have been summarised in Para. 4.3.6.</p> <p>(b) Revised accordingly. On the other hand, para. 4.3.7 has been amended to reflect the proposed stormwater drainage connection.</p>

Departmental Comments		Applicant's Responses
(38)	<p>S4.4 – Construction Phase</p> <p>(a) Please provide mitigation measures (e.g. contractor should register as a chemical waste producer if chemical wastes are produced from construction activities; Waste Disposal Ordinance (Cap. 354) and the subsidiary regulations, particularly the Waste Disposal (Chemical Waste) (General) Regulation (Cap. 354C) etc.) for the accidental spillage of chemicals.</p>	<p>(a) Registration of Chemical Waste Producer was mentioned in para. 5.2.23 (previously numbered 5.2.14). Please refer to Section 5.3 regarding the mitigation measures for construction waste management. For ease of reference, reference to para. 5.2.23 and Section 5.3 has been added to para. 4.4.4.</p>
(39)	<p>S4.4.3</p> <p>(a) last bullet point: Please advise if there is any site canteen during construction phase. If no, please remove “site canteen”.</p> <p>(b) Please revise if the following paragraph should be included: “The Contractor shall not permit any sewage, waste water or effluent containing sand, cement, silt or any other suspended or dissolved material to flow from the Site onto any adjoining land or allow any waste matter which is not part of the final product from waste processing plants to be deposited anywhere within the Site or onto any adjoining land. He shall arrange removal of such matter from the site or any building erected or to be erected thereon in a proper manner to the satisfaction of the Engineer in consultation with the Director of Environmental Protection.”.</p>	<p>(a) “Site canteen” has been removed.</p> <p>(b) The paragraph has been incorporated into Para 4.4.3.</p>

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(40)	<p>S4.4.6 to S4.4.7</p> <p>(a) Please supplement a paragraph for sewage generated from toilet and grey water from washing sinks.</p> <p>(b) Please supplement the mitigation measures for other non-point/diffuse source pollution, such as dust, tyre scraps, oil, washed from the paved roads during rainstorm.</p> <p>(c) Please supplement the contingency plan in case of emergency, such as tank leakage and overflow.</p>	<p>(a) Para 4.4.8 has been provided.</p> <p>(b) Para 4.4.9 has been provided.</p> <p>(c) Para 4.4.10 has been provided.</p>
(41)	<p>S4.4.7</p> <p>Please be reminded that the sedimentation tank should have sufficient capacity and can operate effectively.</p>	Noted.
(42)	<p>S4.5.3</p> <p>Please advise if 100% treated effluent will be reused on-site.</p>	As advised by the applicant, the treated effluent will be fully reused on-site.
Comments of the Chief Engineer/Mainland North, Drainage Services Department (CE/MN, DSD)		
Comments on the submitted Drainage Proposal		
(1)	No objection from the public drainage viewpoint;	Noted.
(2)	The submitted drainage proposal does not provide sufficient information as required in DSD's "Technical Note to Prepare a Drainage Submission". Hence, should the application be approved, a condition should be included to request the applicant to submit and implement a drainage proposal to ensure that it will not cause adverse drainage impact to the	Noted. Update drainage proposal with further information will be provided once the application is approved as condition.

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	adjacent areas. The applicant should construct and maintain the proposed drainage facilities whether within or outside the captioned lots at his own expense.	
(3)	The drainage facilities should be properly maintained at all times during the planning approval period and rectified if they are found inadequate/ ineffective during operation.	Noted.
(4)	The site is in an area where public sewerage connection is available. Environmental Protection Department (EPD) should be consulted regarding the sewage impact assessment and sewage treatment/ disposal facilities for the proposed use.	EPD has been consulted regarding the sewage impact assessment and sewage treatment/ disposal facilities for the proposed use
(5)	<p>The applicant is advised the following on the submitted drainage proposal:</p> <p>(a) the submitted drainage proposal does not provide sufficient information as required in DSD's "Technical Note to Prepare a Drainage Submission". Hence, the applicant should submit a revised drainage proposal for her review;</p> <p>(b) Paragraph 3.4.1: the applicant should supplement details on how the surface runoff of the site is conveyed to the discharge point before the development, and advise if the discharge points before and after the development are the same;</p>	Update drainage proposal with further information will be provided once the application is approved as condition.

Departmental Comments		Applicant's Responses
	<p>(c) Paragraph 3.4 2: the applicant should clarify if there is any existing connection between the site and the village communal drainage system. If not, details of the proposed drainage system should not be put under section 3.4 (Existing Drainage Layout);</p> <p>(d) Paragraph 3.5.2: manhole numbers and existing private manholes are not shown in Figure 3-3. The applicant should update;</p> <p>(e) Paragraph 3.5.5: the applicant should supplement details (e.g. location, dimension, operation mechanism etc.) of the proposed water silo;</p> <p>(f) Paragraph 3.5.7: the applicant should supplement details (e.g. location, treatment capacity etc.) of the supplementary treatment system;</p> <p>(g) Figure 3-3: only a schematic design of drainage system is shown in this figure. The applicant should supplement sufficient details of the drainage system for her review;</p>	
Comments on the submitted Sewage Impact Assessment		
(1)	<p>The applicant is advised the following on the submitted Sewerage Impact Assessment (SIA):</p> <p>(a) The SIA report needs to meet the full satisfaction of Sewerage Infrastructure Group (SIG) of EPD, the planning</p>	<p>(a) Noted. Option 1 (i.e. sewage to be discharged into the public sewerage system) is the preferred option over Option 2. However, the applicant is</p>

Departmental Comments		Applicant's Responses
	<p>authority of sewerage infrastructure. The applicant should advise whether option 1 (connection to public sewerage system) or option 2 (portable toilet) would be adopted.</p> <p>(b) Paragraph 2.1.2: the applicant should clarify if wastewater from the Site is discharged to the public sewerage system currently.</p>	<p>still undergoing consent issues with lot owners as the proposed sewer connecting the terminal manhole and the nearest foul manhole will cross some private lots. As such, Option 2 (i.e. sewage to be tankered away) is provided in the report as a backup option in case agreement could not be obtained from private lot owners.</p> <p>(b) Wastewater is currently collected, temporarily stored and tankered away instead of discharging to the public sewerage system. Para. 2.1.2 has been revised accordingly.</p>
3. Comments of the Commissioner for Transport (C for T)		
(1)	The critical roads and junctions covered in the TIA are fewer than that for the previously approved application. The applicant shall provide justification.	<p>Please refer to the revised Traffic Impact Assessment report (Annex VI). The previous application (A/NE-TKL/681) was approved in 2022, according to the latest operation experience of the applicant, their concrete will mainly supply to the Ping Che region in which their concrete batching trucks will mainly travel along Ping Che Road to reach their customers.</p> <p>As the concrete batching trucks are unlikely to travel to other regions (e.g. via Sha Tau Kok Road), the AOI is therefore revised from the last application to suit the latest operation condition of the application site.</p>
(2)	Given that the traffic data between 2019 and 2022 are largely affected by the social events and the pandemic, the applicant shall also taken into account the traffic survey data taken in 2024 and 2025 for deriving a more sensible average annual growth factor;	Noted. Further justification has been provided in Para 4.3.6 and 4.3.7 with recent observed data (Table 4-3).

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(3)	The proposed vehicular access between Ping Che Road and the application site is not managed by TD. The applicant should seek comments from the responsible party.	Noted. Comments from responsible parties will be sought.
(4)	We may offer further comments on the application after receiving the above information.	Noted.