

**Response-to-Comment**

**Proposed Temporary Concrete Batching Plant for a Period of 5 Years in “Other Specified Uses” annotated “Boatyard and Marine-oriented Industrial Uses” Zone, Area shown as ‘Road’ and Area not Covered by Statutory Plan, Tsing Yi Town Lots 14 and 15 and Adjoining Government Land, Tam Kon Shan Road, Tsing Yi, New Territories**

**(Application No. A/TY/150)**

(i) The applicant provides the following information in support of the application:

- with the planned development in San Tin Technopole and the continued developments in various NDAs, it is foreseeable that the amount of construction works and the demand for ready-mixed concrete arising from public and private planned development projects shall remain high; and
- the proposed development of a new concrete batching plant is therefore expected to meet the ever-growing demand of local ready-mixed concrete induced by various infrastructural projects and residential developments in Hong Kong.

(ii) A RtC table:

Departmental Comments		Applicant's Responses
<b>1. Comments of the Environmental Protection Department (EPD)</b>		
(a)	Section 2.4 and Section 3: For the avoidance of doubt, please revise “drainage impact” to “sewerage impact” in Section 2.4 and Section 3.	Noted. The Sewage Impact Assessment report has been revised accordingly ( <b>Annex 1</b> ).
<b>2. Comments of the Port Works Division, Civil Engineering Development Department (PWD, CEDD)</b>		
(a)	PWD, CEDD wishes to remind the applicant that the structural integrity and stability of the existing marine structures/seawall must not be compromised during the construction or operation of the proposed works. Should any damage to these structures occur as a result of the works or related activities, the applicant will be fully responsible for repairing the damage at their own cost.	Noted. The applicant will keep monitoring the structural integrity and stability of the existing marine structures/seawall during the construction or operation of the proposed works. Should any damage to these structures occur as a result of the works or related activities, the applicant will be fully responsible for repairing the damage at our own cost.

Departmental Comments		Applicant's Responses
<b>3. Comments of the Planning Department (PlanD)</b>		
(a)	Table 1 and Table 3 of Supporting Planning Statement – The Consultant may wish to include the building height (BH) of the proposed temporary development in <u>mPD</u> for the sake of clarity.	The building height is at around 35.3 mPD (31 m plus 4.3 m) measured from Ground Floor i.e. 4.3 mPD.
<b>4. Comments of the Water Supplies Department (WSD)</b>		
(a)	Refer to the proposed site layout plan, it is noted that part of the existing public road may become part of the land lot serving as a private run in/out with additional ramp. This may affect our existing water mains (see WSD Mains Record Plan attached) and the associated operation and maintenance works.	The project team confirms that there is no intention to alter the current status or conditions of the existing public road. The existing access arrangement will be maintained in its current form as far as practicable. Detailed design will carefully take into account the locations of the existing water mains as shown in the WSD Mains Record Plan. Coordination with the WSD will be carried out as necessary during the design development stage to ensure protection of existing utilities and to facilitate future operation and maintenance activities.
(b)	The applicant should clarify that the proposed run-in-out will not become a private road.	The project team confirms that there is no intention to convert the existing public road, including the proposed run-in/out, into a private road. The current access arrangement will be maintained as far as practicable.
(c)	If the run-in-out will maintain a public road, as this part of walkway will become a carriageway, applicant shall confirm this section of road can comply with WSD's requirement on the minimum depth requirements as stipulated in our 'Manual of Mainlaying Practice' as well as Highways Department (HyD)'s minimum depth for underground services. Hence the existing water mains can be protected.	During the detailed design stage, the project team will ensure compliance with the WSD's minimum depth requirements as stipulated in the 'Manual of Mainlaying Practice', as well as relevant HyD standards for underground services. The design will take into careful consideration the locations of existing water mains as shown in the WSD Mains Record Plan. The project team will coordinate with WSD as necessary throughout the design development process to ensure the protection of existing water mains and adherence to all applicable requirements.

Departmental Comments		Applicant's Responses
<b>5. Comments of the Electrical and Mechanical Services Department (EMSD)</b>		
(a)	In the interests of public safety and ensuring the continuity of electricity supply, the parties concerned with planning, designing, organising and supervising any activity near the underground cable or submarine cable under the mentioned document should approach the electricity supplier (i.e. CLP Power) for the requisition of cable plans to find out whether there is any underground cable and/or submarine cable within and/or in the vicinity of the concerned site. They should also be reminded to observe the <i>Electricity Supply Lines (Protection) Regulation</i> and the "Code of Practice on Working near Electricity Supply Lines" established under the Regulation when carrying out works in the vicinity of the electricity supply lines, and be reminded to enquire the electricity supplier for the required precautionary measures for work near submarines cable and to execute them during design and construction.	Noted. The applicant will enquire the electricity supplier to find out whether there is any underground cable and/or submarine cable within and/or in the vicinity of the Site well before carrying out works and execute required precautionary measures for work near submarines cables during design and construction.
<b>6. Comments of the Fire Services Department (FSD)</b>		
(a)	Detailed fire services requirements will be formulated upon receipt of formal submission of STT/STW, general building plans or referral of application via relevant licensing authority as appropriate. Furthermore, the EVA provision in the captioned work shall comply with the standard as stipulated in Section 6, Part D of the Code of Practice for Fire Safety in Buildings 2011, which is administered by the Buildings Department.	Noted.

Departmental Comments		Applicant's Responses
<b>7. Comments of the Buildings Department (BD)</b>		
(a)	It is noted that the temporary concrete batching plant is proposed in the captioned application. Before any new building works (including containers/open sheds as temporary buildings, demolition and load filling etc.) are to be carried out on application site, prior approval and consent of the Building Authority (BA) should be obtained, otherwise they are unauthorised building works (UBW) under the Buildings Ordinance (BO). An Authorised Person should be appointed as the coordinator for the proposed building works in accordance with the BO.	Noted.
(b)	The application site abuts a specified street (Tam Kon Shan Road) of not less than 4.5 m wide. Its permitted development intensity shall be determined under the First Schedule of the Building (Planning) Regulation (B(P)R) at the building plan submission stage;	
(c)	If the structure is erected on leased land without approval of the BA, they are UBW under the BO and should not be designated for any proposed use under the captioned application.	
(d)	For UBW erected on leased land, enforcement action may be taken by the BD to effect their 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.	

Departmental Comments		Applicant's Responses
<b>8. Comments of the Marine Department (MD)</b>		
(a)	For the proposed dredging of the seabed to a depth of 3.8 metres, all statutory requirements must be followed.	Noted. All statutory requirements related to dredging works will be strictly followed in accordance with relevant government regulations and procedures.
(b)	The applicant should liaise with the Lands Department to arrange a "blue area" to allow sufficient space for safe berthing in future.	Noted. The applicant will liaise with the Lands Department to explore the designation of a "blue area" to ensure sufficient safe berthing space for the proposed operations.
(c)	The project proponent should be reminded that their barging operations must not impede the existing private mooring (PM) owners (PM Nos. 1322 and 1381) from using their moorings. Consent from the PM owners must be obtained for the barging operation.	The applicant is currently liaising with the respective buoy owners to obtain written confirmation of no objection to the proposed use of the adjacent waters for marine operations. Preliminary discussions have been conducted, during which the buoy owners expressed no objection in principle to the proposed arrangements. While formal consent is being arranged, no major concerns are anticipated, and the applicant will continue to coordinate closely to ensure alignment and avoid any future operational conflict.
(d)	The proposed project will introduce new marine traffic, including 50-meter-long cement carriers to the concerned waters. Given the relatively strong tidal currents, the restricted manoeuvring space, and the presence of various nearby private mooring buoys and piers accommodating different types of vessels with frequent maritime activities, Marine Traffic Impact Assessment (MTIA) shall be conducted to detail the marine operations in both construction and operational stage, access impact to existing marine traffic and finally to recommend mitigation measure to the risk. The current Barging Operation Plan for the construction-related activities or the number of vessels involved. Addressing these aspects will be critical to ensuring the safe and efficient management of marine traffic during the project's implementation.	MTIA will be prepared to account for site-specific conditions such as tidal currents, navigational constraints, and interactions with existing marine users. Additional time is required to undertake the necessary analysis and coordination with relevant stakeholders. It is therefore proposed that the MTIA be incorporated as an approval condition, so that the assessment can be conducted with sufficient technical depth and in accordance with relevant regulatory requirements and operational considerations.

Departmental Comments		Applicant's Responses																																		
9. Comments of the Transport Department (TD)																																				
(a)	Compared to the previously planning application (No. A/TY/134) which featured a similar GFA and site configurations, the concrete production rate has increased remarkably from 700 m <sup>3</sup> per day to 300 m <sup>3</sup> per hour. This represents a substantial escalation in traffic generation and attraction, which warrants thorough review.	<p>As illustrated in the Table 4.1 in the Traffic Impact Assessment (TIA), the anticipated peak hourly development trips have already taken into account the effect of a heightened concrete production rate of 300 m<sup>3</sup> per hour.</p> <p><b>Table 4.1 Development Traffic Generation</b></p> <table><tr><th rowspan="2">Use</th><th colspan="3">Generation</th><th colspan="3">Attraction</th></tr><tr><th>AM Peak</th><th>Noon Peak</th><th>PM Peak</th><th>AM Peak</th><th>Noon Peak</th><th>PM Peak</th></tr><tr><td>Private Car Trips (pcus/ hour) <sup>(a)</sup></td><td>2</td><td>2</td><td>2</td><td>2</td><td>2</td><td>2</td></tr><tr><td>Concrete Mixer Truck Trips (pcus/ hour) <sup>(b)</sup></td><td>121</td><td>121</td><td>121</td><td>121</td><td>121</td><td>121</td></tr><tr><td>Total(pcus/ hour)</td><td>123</td><td>123</td><td>123</td><td>123</td><td>123</td><td>123</td></tr></table> <p>(a) Information provided by the Applicant.</p> <p>(b) The no. of concrete mixer truck generated/attracted by plant = design production capacity/capacity of a concrete mixer truck x 2.8 pcu factor = (300 m<sup>3</sup> per hour/7 m<sup>3</sup>) x 2.8 pcu = 121 pcus per hour.</p> <p>As depicted in Section 4.6 of the TIA, the findings of both the junction capacity assessment and the link capacity assessment indicate that the capacities of all key junctions and key links are expected to function adequately during peak periods in future traffic flows, including the trip generation and attraction associated with the development (Design Scenario).</p>	Use	Generation			Attraction			AM Peak	Noon Peak	PM Peak	AM Peak	Noon Peak	PM Peak	Private Car Trips (pcus/ hour) <sup>(a)</sup>	2	2	2	2	2	2	Concrete Mixer Truck Trips (pcus/ hour) <sup>(b)</sup>	121	121	121	121	121	121	Total(pcus/ hour)	123	123	123	123	123	123
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(b)	With reference to Table 4.1 and Section 6.4 of the Traffic Impact Assessment (TIA), given the narrow site layout and the use of a hammerhead as turn-around facility, a queuing analysis is required to demonstrate that the proposed provision of 3 HGV loading/unloading bay and 12 HGV waiting spaces can accommodate the peak traffic volumes without causing queuing onto adjacent public roads.	<p>As shown in Section 5.2 in the TIA, the design includes 12 dedicated waiting spaces for heavy goods vehicles, such as concrete mixer trucks, ensuring that vehicles can park within the site while awaiting their turn for loading or unloading operations. This provision is critical in maintaining traffic flow along the surrounding public roads, as it eliminates the risk of vehicles queuing or waiting on Tam Kon Shan Road.</p> <p>A comprehensive queuing analysis has been conducted to evaluate the loading/unloading bays' functionality. The results, presented in</p>																																		

		<p>Appendix B in TIA, confirm that the probability of queuing on public roads is negligible (less than 0.003%). It indicates a confidence level exceeding 99.9% that there will be no traffic queuing on public roads. Consequently, the proposed internal transport provisions are deemed adequate for the proposed development.</p> <p>Moreover, as present in Section 6.2 in the TIA, a well-designed operation procedure is derived to ensure the smooth loading/unloading activities by maintaining consistent communication between drivers and site management.</p>
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