

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) A RtC table:

Departmental Comments		Applicant's Responses
1. Comments of the Hong Kong Police Force (HKPF)		
(a)	The location is right in the middle of Tam Kon Shan Road, any incident with traffic at the plant, it will cut off Tam Kon Shan Road, and may cause congestion of both east and west of the plant.	Tam Kon Shan Road is not expected to be blocked by plant operations. The internal layout of the application site (the Site) provides 12 dedicated waiting spaces for trucks and 3 loading/unloading bays, which allows vehicles to wait and operate entirely within the Site. Queuing analysis confirms that the chance of vehicles queuing onto the public road is negligible (<0.003%).
(b)	The location is very near the park and playground facilities, with many children. Large vehicles that close or driving past may be unsafe to the park and sport ground users.	To address safety concerns near the adjacent park and playground, specific traffic management and routing restrictions have been implemented as part of the Traffic Management Plan. Notably, “No Left Turn” signs will be installed at the plant's access on Tam Kon Shan Road to enforce a fixed routing pattern, avoiding vehicle turning movements that could bring cement trucks near the playground entrance. All trucks will follow designated ingress and egress routes as illustrated in the approved Traffic Impact Assessment, and there will be no direct vehicle access to the park area. To further enhance safety, trucks will be equipped with front and rear cameras, and real-time GPS tracking will be used to actively manage movement and prevent clustering near sensitive areas.
(c)	The PCU/hr is 123 at peak hours. Any hiccups with the operation will cause congestion, especially with such PCU, the traffic may build up easily.	Link and junction assessments in both existing and future design scenarios confirm that all surrounding roads and junctions will continue to operate below capacity thresholds. No significant congestion is anticipated.

(d)	<p>The other concrete plant is at United Dockyard which HKPF believes is near Sai Tso Wan Road. This location is some distance away. Furthermore, what is the capacity of that location and operation procedures.</p>	<p>The United Dockyard plant is a separate facility operating under its own approvals. Its internal operations and capacity fall outside the scope of this application.</p> <p>That said, we have already taken into account traffic from this and other nearby facilities, as our junction surveys reflect actual traffic conditions observed on site during the survey period. As such, any associated impact has been inherently captured in the baseline traffic data and included in our assessment.</p> <p>We remain open to coordinating with relevant operators if needed to support overall traffic management in the area.</p>
(e)	<p>The manoeuvring of trucks in the plant is not simple and seems to require some time and several turns need to be made, this may cause vehicle to queue to get in or out.</p>	<p>The internal layout of the plant has been designed to accommodate truck turning movements with adequate space. Swept path analysis has been conducted to confirm that all vehicle types can enter and exit without reversing onto public roads. Vehicle movement will be managed to prevent queuing and ensure smooth internal circulation.</p>
(f)	<p>A common complaint against cement truck in the area is the overloading of cement and then dropping of the cement onto the road, thereby severely damaging the road. What are their preventive measures and remedial measures.</p>	<p>All cement trucks serving the proposed plant will be equipped with front and rear cameras to monitor driving behavior and ensure compliance with traffic and safety protocols. Operational procedures include proper loading control, enclosed mixer drums, and a designated cleaning area within the Site. These measures help prevent spillage and road contamination.</p> <p>Furthermore, the plant has established a non-conformance and auditing mechanism which ensures that any spillage or incidents are addressed immediately. Enforcement measures such as on-the-spot clean-up, fines, and contract penalties are in place to hold operators accountable and protect the public road network from damage.</p>

- (ii) Regarding HKPF's concern on the traffic impact, flow and safety, the applicant provides the following measures to alleviate relevant potential impacts that would have arisen from the proposed development:
- all concrete mixers will enter and exit via the ramp connecting Tsing Yi North Coastal Road and Tam Kon Shan Road, and will not use any internal roads of Cheung Fat Estate;
 - "No Left Turn" and "No Right Turn" signs will be installed at the plant entrance to prevent project related trucks from diverting into Cheung Fat Estate;
 - traffic assessments at the key junctions indicate design flow/capacity ratios below 0.78 during the PM peak, demonstrating that any additional delay to other road users will remain within acceptable limits; and
 - pedestrian activity along Tam Kon Shan Road near the plant is very low, "Heavy Vehicles Turning" warning signs will be erected upstream of the entrance to alert other road users.
- (iii) The applicant provides the following information in relation to the contingency plan for the off-site vehicle holding area:
- the off-site holding area provides 12 on-site waiting spaces;
 - surplus vehicles which it is estimated not more than 5 vehicles will be directed to the holding area at Sai Tso Wan Road;
 - all diverted trucks will remain under real-time GPS monitoring to ensure the off-site holding area does not exceed its capacity and to prevent roadside queuing; and
 - drivers of diverted trucks will receive timely updates on expected wait times and clear instructions. They will be directed to an alternate production plant under the applicant and advised when to return once normal loading operations resume.