

Our Ref.: DD 114 Lots 573 RP & 1710
Your Ref.: TPB/A/YL-SK/410

The Secretary,
Town Planning Board,
15/F, North Point Government Offices,
333 Java Road,
North Point, Hong Kong

By Email

08 April 2025

Dear Sir,

Further Information

**Proposed Temporary Concrete Batching Plant
with Ancillary Facilities for a Period of 5 Years in “Industrial (Group D)” Zone,
Lots 573 RP and 1710 in D.D. 114, Shek Kong, Yuen Long, New Territories**

(S.16 Planning Application No. A/YL-SK/410)

We write to submit further information to provide clarifications on the subject application.

Should you require more information regarding the application, please contact our [REDACTED]
[REDACTED] or the undersigned at your convenience.
Thank you for your kind attention.

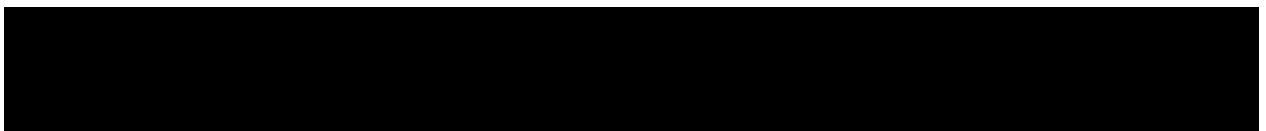
Yours faithfully,

For and on behalf of
R-riches Property Consultants Limited



Christian CHIM
Town Planner

cc DPO/FSYLE, PlanD



Further Information

**Proposed Temporary Concrete Batching Plant
with Ancillary Facilities for a Period of 5 Years in “Industrial (Group D)” Zone,
Lots 573 RP and 1710 in D.D. 114, Shek Kong, Yuen Long, New Territories**

(Application No. A/YL-SK/410)

- (i) The applicant provides responses to the following departmental comments:

Departmental Comments		Applicant's Responses
1. Comments of the Director of Agriculture, Fisheries and Conservation (DAFC)		
(a)	According to the site plan, it is noted that the subject site would encroach into existing stream along its southern boundary. In this regard, the proposed development will pose direct impact on the stream while stream and watercourse should be preserved as far as possible from nature conservation perspective.	<p>Although there is a minor encroachment of Lot 573 RP in D.D. 114 into the watercourse along its southern boundary, all structures of the proposed development maintain a distance of <u>at least 3.8 m from the top bank of the watercourse</u> (please refer to the proposed layout at Plan 10 of the original submission). Besides, <u>no filling of land will be carried out in any part of the watercourse</u>.</p> <p>In order to protect the watercourse as far as possible, the following measures are proposed in the reports of the Environmental Assessment (EA) and Drainage Proposal:</p> <ul style="list-style-type: none"> - sewage arising from the proposed development would be temporarily stored in sewage holding tanks and then tankered away for off-site disposal in a sewage treatment facility; and - perimeter channels with sand traps/catch pits are proposed to collect the surface runoff from the application site (the Site), so that no surface runoff would be washed directly into the watercourse. <p>In view of the above, it is expected that the proposed development would not impose adverse environmental and drainage impacts on the watercourse.</p>

Departmental Comments		Applicant's Responses
2. Comments of the District Lands Officer/Yuen Long, Lands Department (DLO/YL, LandsD)		
(a)	By desktop checking, the boundary of the Application Site deviates from the boundary of the Lots and encroached on Lot No. 574 S.A in D.D. 114 and the adjoining Government land. The actual lot boundary of the private lots under the application have to be verified at the land application stage if any STW and/or STT is/are applied for by the Applicant to LandsD.	<p>Noted. Matters on land administration will be liaised with LandsD upon the submission of applications for Short Term Waiver and/or Short Term Tenancy after obtaining the planning permission from the Town Planning Board (the Board).</p> <p>Detailed survey was conducted to delineate the lot boundaries, i.e. Lot Nos. 573 RP and 1710 in D.D. 114. The Site consists of 2 private lots with private land area of 4,332 m² (about) of Old Schedule Lot held under Block Government Lease (Lot No. 573 RP in D.D. 114) and 79 m² (about) of New Grant Lot (Lot No. 1710 in D.D. 114).</p> <p>On 4.10.2024, the submission of Land Boundary Plan and Survey Record Plan of Lot Nos. 573 RP and 1710 in D.D. 114 was acknowledged by the District Survey Office/Yuen Long, LandsD (Annex 1).</p>

- (ii) The applicant provides the "Memorandum of Understanding" signed by the applicant and the affected business operator, who has authorised the applicant to submit the current application on its behalf (**Annex 2**).
- (iii) The applicant provides the following clarifications on the justifications of the current application:
- with reference to the implementation programme, the affected premises falls within the land resumption limit for the second phase development of the Hung Shui Kiu/Ha Tsuen New Development Area (HSK/HT NDA). As land where the premises will be developed for industrial and government, Institution or community uses, the concerned parcel of land is expected to be resumed and reverted to the Government in 2025. Therefore, the applicant desperately needs to identify a suitable site for relocation in order to continue its business operation;
 - ready-mixed concrete is one of the most commonly-used raw materials for construction projects in Hong Kong. With the continued development across various NDAs in the New Territories (such as HSK/HT NDA, Kwu Tung North NDA etc.), the amount of construction works and the demand for concrete arising from planned development projects will remain high. The continued operation of the concrete batching plant can ensure a steady and

- sustainable concrete supply and reduce cross-region traffic for concrete delivery; and
- in view of the continued development across various NDAs in the New Territories, the increase in silo capacity and production capacity is to meet the growing demand for ready-mixed concrete production. The applicant will adopt mitigation measures to alleviate the potential environmental impacts whilst maintaining a more efficient production of ready-mixed concrete.
- (iv) The applicant provides the following clarifications on the proposed road work on the local access i.e. Chun Yiu Road:
- the local access is an existing paved road with a minimum width of about 6 m, which allows 2-lane 2-way traffic between the Site and Kam Tin Road. However, portion of the local access has fallen into disrepair and is currently covered with debris/leftovers. Some vehicles, with or without valid vehicle licences, have been illegally parked/stored on the side of the local access;
 - as mentioned in Section 5.4 of the Planning Statement, the applicant intends to carry out upgrading work on the local access, including the removal of debris/leftovers and illegally-parked vehicles. Therefore, the proposed upgrading work solely comprises minor maintenance works to the existing local access. Figure 3.1 from the Traffic Impact Assessment showing the proposed upgrading work of the local access has been revised (**Annex 3**);
 - since the proposed road upgrading work is currently at the preliminary planning stage, the final alignment of the local access shall subject to detailed design, which will be provided at a later stage upon obtaining planning permission from the Board; and
 - the applicant undertakes to submit detailed proposal for the proposed road upgrading work after obtaining the planning permission from the Board. The subsequent implementation works for the road upgrading work would be carried out in accordance with relevant government guidelines and regulations; and such works would be completed by the applicant before commencement of the proposed development. The applicant also commits to manage and carry out maintenance work for the local access.
- (v) The applicant provides the following clarifications on development parameters of the proposed development:
- the proposed concrete batching plant comprises 6 silos with total capacity of about 2,100 tonnes for storage of raw materials for concrete production (i.e. cement, pulverised fuel ash (PFA), ground blastfurnace slag (GGBS), and silica fume (CSF)); and
 - the operation hours are from 07:00 to 23:00 daily (i.e. from Mondays to Sundays (including public holidays)), which consist of a 12-hour production period between 07:00 to 19:00, and a raw material delivery period from 09:00 to 19:00. An evening delivery period of raw materials beyond peak hours between 19:00 and 23:00 will also take place. Except for delivery of ice which cannot be produced/stored on-site, no other raw materials will be

delivered between 07:00 and 09:00. It is estimated that the Site would be able to accommodate about 12 workers. The main source of visitors will be drivers who deliver raw materials/concrete products. Outside visitor is not anticipated.

(vi) The applicant provides the following clarifications on the drainage matters of the proposed development:

- all drainage works will be placed at least 3 m away from the top of the bank of the watercourse. All structures will maintain a distance of at least 3.8 m from the top bank of the watercourse. Appropriate flooding mitigation measures will be provided at the resources of the applicant to the satisfaction of the Drainage Services Department, if necessary;
- perimeter channels with sand traps/catch pits are proposed to collect the surface runoff from the Site, so that no surface runoff would be washed directly into the watercourse. The applicant also ensures that adequate openings will be provided along the site hoardings to intercept the existing overland flow passing through the Site;
- the surface runoff from water sprinklers and wheel washing facilities will be diverted to sedimentation tank for silt removal. After that, the silt/sediment (i.e. cement cake) will be disposed of at fill bank reception facility managed by the Civil Engineering and Development Department. The treated water will then be reused for daily operation of the concrete batching plant, including concrete mixing, vehicle washing etc;
- the drainage system for surface runoff from the Site and overland flow passing through the Site (i.e. perimeter channels and sand trap/catch pit) will be separated from the drainage system for surface runoff from water sprinklers and wheel washing facilities (i.e. sedimentation tank); and
- the applicant commits to submit a revised drainage proposal with the provision of on-site drainage facilities and sedimentation tanks before commencement of the proposed development. The applicant will comply with relevant ordinances and regulations for the provision of on-site drainage facilities. The applicant also commits to manage and carry out maintenance work for the on-site drainage facilities.

(vii) The applicant provides the following clarifications on the environmental matters of the proposed development:

- some temporary structures are found beyond the northern periphery of the Site. In order to mitigate the potential adverse noise, air quality and visual impacts on these structures, the applicant proposes Aggregate Stockpile No. 2 (which will serve to stockpile finer aggregates) to be enclosed on the top and the 3 sides;
- coarser aggregates will be stockpiled in Aggregate Stockpile No. 1. Albeit not to be enclosed on the top, metal walls will be erected along the 3-sides of Aggregate Stockpile No. 1;
- the following mitigation measures on both aggregate stockpiles are proposed in the EA to

alleviate the potential adverse impacts to the surroundings (refer to Sections 2.3 and 3.4 of the EA for details):

- provision of hard paving on open area and regular watering to reduce dust emissions;
 - stockpile of dusty materials shall be either covered entirely by impervious sheeting, placed in an area sheltered on the top and 3 sides, or sprayed with water so as to maintain the entire surface wet;
 - tarpaulin covering of all dusty vehicles loads transported to, from and between site locations; and
 - major noise sources will be enclosed/semi enclosed; and
- the applicant will follow relevant ordinances and regulations for the operation of the proposed development. The applicant will obtain relevant licences such as Specified Process (SP) Licence and relevant waste disposal permits from the appropriate authorities; including Chemical Waste Permits/licenses under the *Waste Disposal Ordinance (Cap 354)*, *Water Pollution Control Ordinance (Cap 358)*, Public Dumping Licence under the *Land (Miscellaneous Provisions) Ordinance (Cap 28)*, Effluent Discharge Licence under the *Water Pollution Control Ordinance*.

(viii) The applicant provides the following clarifications on the concrete production workflow:

- raw materials for concrete production delivered to the Site will be stored in respective silos and aggregate stockpiles;
- aggregates, cement, ice and other raw materials (including PFA, GGBS and CFS) will be transferred to the mixing towers via the receiving hoppers, bucket elevators and conveyor belts for mixing;
- the mixed concrete will be loaded onto concrete trucks for delivery; and
- please refer to the schematic diagram enclosed at **Annex 4** for details of the production workflow.

(ix) The applicant provides a revised layout plan to include indications of the site boundary, and the width and location of the site ingress/egress (**Annex 5**).