

**Appendix III**  
**Responses to Departmental Comments and  
Received in the Pre-submission Stage**

## 1. INTRODUCTION

Prajna Dhyana Temple (the Temple) is located in No. 100 Shek Mun Kap, Tung Chung, Lantau Island. It is affiliated with Buddhist Navigation Vihara, which is a popular non-profit making Buddhist religious institution that has been established by Master Chuan Ban in 2000. In order to cater for the need of increasing number of monks, disciples and members and to cope with its popularity as a religious centre, Buddhist Navigation Vihara Ltd. (the Applicant) would like to submit a planning application under section 16 of the Town Planning Ordinance (s.16 planning application) for the proposed partial redevelopment of the Temple.

In order to support the s.16 application, a pre-submission with a copy of the Planning Statement with technical assessments were submitted to the Planning Department (PlanD) on 21.7.2025. Subsequently, relevant departmental comments were received between 15.9.2025 and 26.9.2025, including:-

- Buildings Department (BD)
- Drainage Services Department (DSD)
- Environmental Protection Department (EPD)
- Fire Service Department (FSD)
- Food and Environmental Hygiene Department (FEHD)
- Geotechnical Engineering Office (GEO) of Civil Engineering and Development Department (CEDD)
- Home Affairs Department (HAD)
- Hong Kong Police Force (HKPF)
- Housing Department (HD)
- Highways Department (HyD)
- Lands Department (LandsD)
- Landscape Unit (LU) of PlanD
- Sustainable Lantau Office (SLO) of CEDD
- Transport Department (TD)
- Urban Design Unit (UD) of PlanD
- Water Supplies Department (WSD)

The responses to the comments from the abovementioned departments are provided in **Section 2.1** to **Section 2.16** below. The Planning Statement and technical assessments have been updated accordingly by taking into account the departmental comments received from the pre-submission stage.

## 2. RESPONSES TO DEPARTMENTAL COMMENTS

### 2.1 Responses to Comments from Buildings Department

Items	Departmental Comments	The Applicant's Responses
<b>Comments Received on 15.9.2025</b>		
BD (A1)	1. There is no in-principle objection under the Buildings Ordinance ("BO") to the proposed use on the application site;	Noted.
BD (A2)	2. There is no record of approval by the Building Authority for the structures existing at the application site;	Noted.
BD (A3)	3. The premises of existing private columbarium Block B, 般若禪寺地藏殿 is subject to an application for Specified Instruments ("SI") <sup>1</sup> under the Private Columbaria Ordinance (Cap 630) ("PCO"). BD's no objection to the Exemption application for Block B, 若禪寺地藏殿 has been provided to the FEHD;	Noted.
BD (A4)	4. A private columbarium eligible to apply for a SI under the PCO can be (a) a building or building works which complies with the requirements for approval and consent to the commencement of building works under section 14 of the BO; (b) a Certifiable Building (CB) <sup>2</sup> ; or (c) a part or the whole of Structures Certifiable for Pre-cut-off Columbarium (SCPC) <sup>3</sup> . When the SCPC are covered by a SI or the application of such, they are not subject to the BD's enforcement under section 24(1) or 24C(1) of the BO on the ground of contravening section 14(1) of the BO. However, should they become dangerous or likely to cause danger, they will have to be removed under the relevant provisions of the BO;	Noted.

<sup>1</sup> As defined under section 2 of the PCO, which may be a Temporary Suspension of liability, an Exemption or a License.

<sup>2</sup> As defined in section 3(3) of Schedule 2 to the PCO.

<sup>3</sup> As defined in section 4 of Schedule 2 to the PCO which includes the ground storey of UBWs, or a New Territories Small Building ("NTSB") that came into existence on or after 16 October 1987 but not issued with CoE operating before the cut-off time and with ashes interred in niches.

Items	Departmental Comments	The Applicant's Responses
BD (A5)	5. Before any new building works (including containers/open sheds as temporary buildings) are to be carried out on the application site, the prior approval and consent of the BD should be obtained, otherwise they are Unauthorized Building Works (UBW). An Authorized Person (AP) should be appointed as the coordinator for the proposed building works in accordance with the BO;	Noted
BD (A6)	6. In connection with (5) above, the site shall be provided with means of obtaining access thereto from a street and emergency vehicular access in accordance with Regulations 5 and 41D of the Building (Planning) Regulations (B(P)R) respectively;	Noted, details shall be submitted at building plan submission stage.
BD (A7)	7. If the site does not abut on a specified street of not less than 4.5m wide, its permitted development intensity shall be determined under Regulation 19(3) of the B(P)R at the building plan submission stage;	Noted.
BD (A8)	8. Detailed comments under the BO on individual sites for private developments such as permissible plot ratio, site coverage, means of escape, fire resisting construction, emergency vehicular access, private streets and/or access roads, etc. will be formulated at the building plan submission stage;	Noted.
BD (A9)	9. Except for SCPC and CB, no part of a private columbarium shall be located under or over any structures built without the approval and consent of the Buildings Department (BD);	Noted.
BD (A10)	10. SCPC are UBWs and so are the building works to improve or strengthen such. Where building works for improvement is indispensable, the qualified professionals appointed by the applicant should prepare the improvement/strengthening proposal for acceptance by the Private Columbaria Licensing Board ("PCLB") or the BD under the licensing regime;	Noted.

Items	Departmental Comments	The Applicant's Responses
BD (A11)	11. If any building improvement works result in extending the size of the SCPC, such extensions might NOT be qualified as SCPC but UBWs actionable under the BO albeit covered by the application of an SI;	Noted.
BD (A12)	12. If alteration of a New Territories Small Building ("NTSB") results in size exceeding the exemption criteria under the Buildings Ordinance (Application to the New Territories) Ordinance (Cap. 121), e.g. addition of an external staircase or making openings between party walls of NTSBs combining two or more NTSBs, it will be ultra vires for the BD to process such alteration proposals under the PCO or the BO unless the relevant CoE is still valid;	Noted.
BD (A13)	13. After issuance of an SI, if unauthorised alteration works be identified without prior acceptance by the PCLB or the BD, such works will be regarded as UBWs but not covered by the SI. The BD would raise objection to the PCLB upon application for renewal of the SI, and such UBWs will be subject to enforcement under the BO for removal;	Noted.
BD (A14)	14. The applicant should provide certification issued by qualified professionals certifying that the requirements specified by PCLB and the BD are complied with. Annexes 4 and 5 of the "Application Guide for Private Columbarium Licence and Other Specified Instruments" are relevant; and	Noted.
BD (A15)	15. The proposed new columbarium building at Block E and the existing building attached to Block B are currently not subject to any Licence / Exemption application. The applicant shall ensure their eligibility for a SI under the PCO. Detailed building safety requirements will be provided separately upon receiving the Licence application.	Noted.

## 2.2 Responses to Comments from Drainage Services Department

Items	Departmental Comments	The Applicant's Responses
<b>Comments Received on 15.9.2025</b>		
DSD (A1)	<u>Public Stormwater Drainage Aspect</u> 1. The Planning Statement provides that the hard-paved area of the subject site would be increased by approx. 4.75 m sq. which is approx. +0.415% of the original total hard-paved area. The Planning Statement also concludes that the proposed development will not result in any significant impact on the stormwater drainage aspect; and	Noted.
DSD (A2)	2. As the proposed development is located next to Tung Chung River, the Applicant is reminded to pay attention to the risk of flooding and take precautionary measures in case of heavy rainfall.	Noted. The Applicant will pay attention to the risk of flooding and take precautionary measures in case of heavy rainfall.
DSD (A3)	<u>Public Sewerage Aspect</u> 1. The Planning Statement provides that a sewage holding tank will be provided to temporarily store the sewage generated for off-site disposal. The Applicant will be responsible for the operation and maintenance of the proposed sewage holding tank, and shall be responsible for the tanker-away process. The Planning Statement also concludes that the proposed development will not result in any significant impact on the sewerage aspect; and	Noted.
DSD (A4)	2. In passing, the applicant is reminded to consult the CEDD project office of the Tung Chung New Town Extension project which works is in close vicinity to the application site, for further information on the proposed public stormwater drainage and sewerage facilities nearby, to facilitate their formulation of the detailed design proposals as mentioned in their Planning Statement.	Noted. Comments from CEDD have been received via PlanD.

## 2.3 Responses to Comments from Environmental Protection Department

Items	Departmental Comments	The Applicant's Responses
<b>Comments Received on 15.9.2025</b>		
EPD (A1)	<p><u>Air Quality</u></p> <p>1. Section 4.2(a):</p> <p>i. Please discuss the buffer distance requirements of HKPSG, legislative requirements e.g. APCO, AQOs, and the background air quality of the project area by quoting the AQMS and PATH data which are available in SAMP v2.1.;</p>	The buffer distance requirements of HKPSG, legislative requirements e.g. APCO, AQOs, and the background air quality of the project area by quoting the AQMS and PATH data which are available in SAMP v2.1 are revised in Section 2.2 and 2.3 of the Environmental Assessment report (see <b>Appendix VI</b> ).
EPD (A2)	<p>ii. Please identify the representative ASRs during construction phase and present the information of the ASRs (IDs, name, types, heights, shortest distance to the project) in a table;</p>	The representative ASRs during construction phase is shown in Table 2.6 and Figure 2.1.
EPD (A3)	<p>iii. Please present the representative ASRs and concurrent projects in a figure, with overlay of PATH grid and 500m assessment area</p>	The representative ASRs during construction phase, concurrent projects with overlay of PATH grid and 500m assessment area are shown in Figure 2.1. Potential concurrent projects are shown in Table 2.6.
EPD (A4)	<p>iv. Please separate the discussions into construction phase (paragraphs 2-3) and operation phase (paragraphs 1 and 4, Section 4.2(b));</p>	Discussion on construction phase air quality impact are supplemented in Section 2.4 and 2.5, and that of operation phase are supplemented in Section 2.6.
EPD (A5)	<p>v. Paragraph 1 – We would like to remind the applicant that it should be the responsibility of the applicant and their consultant to ensure the validity of the chimney emission source data by their own site surveys. Should the information be subsequently found to be incorrect, the assessment result as presented in the planning application would be invalidated;</p>	Noted. Further site survey is conducted in October 2025, no chimney emission identified in 500m assessment area.
EPD (A6)	<p>vi. Paragraph 2 – The calculation of daily excavated materials in line 4-5 is incorrect. Please review and revise number of dump trucks;</p>	Calculation of dump trucks are revised in Section 2.4.

Items	Departmental Comments	The Applicant's Responses
EPD (A7)	vii. Please discuss gaseous emissions during construction, including the number of mechanical equipment to be used per time over the work site;	Gaseous emissions during construction are supplemented in Section 2.4
EPD (A8)	viii. Paragraph 3 – :  (a) Please move the discussion of concurrent projects in the first sentence to a separate paragraph. Please provide the construction programme and identify all concurrent projects within 500m assessment area during construction phase. Cumulative impact during construction phase should also be evaluated; and	Concurrent projects and cumulative impacts during construction phase are supplemented in Section 2.4.5 to 2.4.7.
EPD (A9)	(b) Line 4 should read "Air Pollution Control (Fuel Restriction) Regulations"	Guidelines are stated in Section 2.2.
EPD (A10)	ix. Paragraph 4 – Please supplement the followings :  (a) Scale of the joss paper furnace;	Project Proponent to advise model size of 40kg/hour or 80kg/hour.
EPD (A11)	(b) Whether the joss paper furnace is equipped with air pollution control equipment, such as water scrubber, electrostatic precipitator, exhaust fan, etc. and the removal efficiency;	The eco-furnace is equipped with air pollution control equipment, no available information of removal efficiency and it is the most commonly adopted type in temples and columbarium in Hong Kong.
EPD (A12)	(c) Whether the joss paper furnace would be used infrequently during most of the time of the year, except during the periods of Ching Ming Festival and Chung Yeung Festival; and	The eco-furnace would be used infrequently during most of the time of the year, except during the periods of Ching Ming Festival and Chung Yeung Festival.
EPD (A13)	(d) Separation distance of joss paper furnace with nearest ASRs.	Separation distance of eco-furnace with nearest ASRs is 127m.
EPD (A14)	x. Please discuss if there is any odour impact.	Odour impact is discussed on Section 2.6.12.



Items	Departmental Comments	The Applicant's Responses
EPD (A15)	2. Section 4.2(b):  i. Please move the discussion of vehicular emission under operation phase air quality impact in Section 4.2(a);	Discussion of vehicular emission are moved under operation phase air quality impact in Section 2.6.
EPD (A16)	ii. Please identify representative ASRs of the proposed redevelopment e.g. openable windows and the fresh air intakes of the most affected air sensitive use;	Amenity block and religious are representative ASRs of the proposed redevelopment. The fresh air intake are not located at façade facing Tung Chung Road.
EPD (A17)	iii. Please also discuss the vehicular emission impact of the access road to the proposed redevelopment from Shek Mun Kap Road if it is not a private road;	The access road to the proposed redevelopment from Shek Mun Kap Road is not a private road and under CEDD PWP Item No. 7786CL. The vehicular emission impact of the access road are evaluated in Section 2.6.
EPD (A18)	iv. Since road widening works of Shek Mun Kap Road is in progress, please compare distance of identified ASRs of the proposed redevelopment to Shek Mun Kap Road (before and after road widening) and Tung Chung Road in order to demonstrate the compliance with the buffer distance requirements stipulated in HKPSG. Please provide a figure showing the distance from road kerbs of Shek Mun Kap Road (before and after road widening) and Tung Chung Road to the nearest air sensitive use of the proposed redevelopment, and shade the buffer distance on the figure;	As the road widening works of Shek Mun Kap Road is in progress, the distance of identified ASRs of the proposed redevelopment to Shek Mun Kap Road after road widening are shown only. The buffer distance from road kerb of surrounding roads the proposed redevelopment is shown in Figure 2.2.
EPD (A19)	v. Please note that the traffic volume and thus the vehicular emission impact of Tung Chung Road could be considered as comparable to either District Distributor or Local Distributor even though it is classified as rural road. As a conservative approach, please allow 10m buffer distance from Tung Chung Road from the air -sensitive uses of the proposed redevelopment. Otherwise, please obtain TD's agreement on the road type of Tung Chung Road as Local Distributor;	Although AADT of Tung Chung Road (Station 5256: 5380) is comparable surrounding local distributor (Station 5311 Yi Tung Road: 16730, Station 6114 Sunny Bay Road: 4460) and is less than surrounding district distributor (Station 5706 Yu Tung Road: 28250, Station 5036 Shun Tung Road: 21980), 10m buffer distance is given to Tung Chung Road as an conservative approach. Application Site is out of 10m buffer area for Tung Chung Road as shown in Figure 2.2.

Items	Departmental Comments	The Applicant's Responses
EPD (A20)	vi. Since Shek Mun Kap Road is not included in ATC 2023, please obtain TD's agreement on the road type;	Noted. TD endorsement on road type of Shek Mun Kap Road will provided once available.
EPD (A21)	vii. Judging from the site plan, Shek Mu Kap Road after road widening would be have less than 20m distance from the application site. Please revise the 2nd last sentence;	The separation distance of widened Shek Mun Kap Road and other roads and the Application Site are revised in Table 2.7.
EPD (A22)	viii. Please discuss the impact of the induced traffic due to the operation of columbarium. Please provide supporting information to confirm whether the road capacity at the road network nearby can absorb the additional traffic generated by the project e.g. by calculating the volume to capacity ratio of the roads. Please also discuss the corresponding measures to minimize the vehicular impact e.g. provide free (electric) shuttle buses, and/or adopt appointment system to control the number of visitors; and	<p>The V/C ratio of Shek Mun Kap Road is supplemented in Section 2.6.6.</p> <p>The corresponding measures included providing shuttle bus and visit-by admission system are adopted to control the number of visitors and minimized the impact of induced traffic due to the operation of columbarium and vehicular impact and discussed in Section 2.6.</p>
EPD (A23)	ix. Please be reminded that if the HKPSG requirements could not be fulfilled, quantitative cumulative impact assessment may be required to evaluate the potential air quality impact to confirm the compliance of the prevailing AQOs criteria.	Noted. HKPSG requirements are fulfilled.
EPD (A24)	<p><u>Noise</u></p> <p>1. Please state clearly that the planned fixed noise sources will be designed, with necessary noise mitigation measures, to fully comply with the relevant requirements in HKPSG standard;</p>	The design of planned fixed noise sources are available in detail design stage. Maximum allowable SWL for the proposed development are calculated to fully comply with the relevant requirements in HKPSG standard. Relevant information are supplemented in Section 3.3.
EPD (A25)	2. Please provide more elaboration on the insignificant road traffic noise impact due to the induced traffic flow from the proposed development (e.g. frequency of shuttle bus);	As there is only 9 shuttle bus / hour in Festival Days and admission only by appointment and shuttle bus. The induced road traffic flow are insignificant to existing road network and thus insignificant traffic noise impact after the

Items	Departmental Comments	The Applicant's Responses
		completion of the proposed development. Relevant discussion is supplemented in Section 3.4.
EPD (A26)	3. In view of the short distances between the proposed development and the planned public housing site (<30m), please provide further details on how the proposed religious bell tower will be operated (e.g. time and frequency of bell ringing) and assess any associated noise impact. Please also propose effective noise mitigation measures where appropriate;	The separation distance of bell tower (located at north of Application Site) to nearest proposed residential development (Area 99a) is ~130m. The operation detail of bell tower are provided in detail design stage and would comply with the relevant requirements in HKPSG standard. It is anticipated no associated noise impact for operation of bell tower.
EPD (A27)	4. Please confirm whether any public announcement system, loudspeaker or any form of amplification system will be allowed within the subject site. If allowed, please elaborate more on how they will be used (e.g. the type of content to be broadcasted, time and frequency of broadcasting, etc.);	The operation detail of public announcement system (if any) are provided in detail design stage and would comply with the relevant requirements in HKPSG standard. It is anticipated no associated noise impact for operation of public announcement system (if any).
EPD (A28)	5. Noted that some small scale religious activities will be held outdoor, please confirm if any noisy activities will be carried out. If so, please propose effective noise mitigation measures where appropriate;	The small religious activity carried outdoor would comply with the relevant requirements in HKPSG standard. It is anticipated no associated noise impact for outdoor small scale religious activities.
EPD (A29)	6. The applicant proposed to provide an eco-furnace and supporting facilities. Please clarify what the supporting facilities are and assess any associated noise impact;	Supporting facilities for eco-furnace are provided as shown in Appendix 2.1. The operation of eco-furnace would comply with the relevant requirements in HKPSG standard. It is anticipated no associated noise impact for operation of eco-furnace.
EPD (A30)	7. As the temple itself and the proposed staff quarters are NSRs, please address any noise impact on the NSRs; and	Centralized ventilation are provided in temple and proposed staff quarters. There is no adverse noise impact on the NSRs.
EPD (A31)	8. S.4.2 (c) - (i) please include the name of ProPECC PN 1/24 (i.e. "Minimizing Noise from Construction Activities"), (ii) as there may be other construction sites in the vicinity of the proposed development, close liaison with relevant parties of the concurrent projects is expected to mitigate the cumulative construction noise impact.	Construction noise impact is discussed on Section 3.2.

Items	Departmental Comments	The Applicant's Responses
EPD (A32)	<p><u>Water Management</u></p> <p>1. Section 4.2(d):</p> <p>i. Please supplement the major activities involved for the proposed redevelopment;</p>	Major activities involved for the proposed redevelopment are elaborated in Section 5.4.
EPD (A33)	<p>ii. Please identify the potential waste types to be generated during the construction phase (e.g., C&amp;D materials associated with excavation works, foundation works, or superstructures? chemical wastes from mechanical machinery? general refuse from site workers?);</p>	The potential waste types to be generated during construction phase are elaborated in Section 5.4.
EPD (A34)	<p>iii. Please provide the estimated quantities of each waste type, along with the appropriate mitigation measures for the potential impacts, as well as the handling/disposal arrangement;</p>	The estimated quantities of each waste type and related information are shown in Table 5.1.
EPD (A35)	<p>iv. Please remove the term "greatly" as it is subjective;</p>	The waste management of the Application Site is revised.
EPD (A36)	<p>v. If applicable, please specify if any generation of waste will be handled and disposed of in accordance with the Waste Disposal Ordinance and its subsidiary regulations;</p>	The guidelines and legislation of waste generation and disposal is stated in Section 5.2.
EPD (A37)	<p>vi. Please elaborate further on the potential sources of municipal solid waste (MSW) to be generated during operation;</p>	The MSW generated during operation phase are discussed in Section 5.4.18.
EPD (A38)	<p>vii. Please review whether any residue from the smokeless joss paper furnace will need to be handled or disposed of;</p>	Insignificant amount of residue are generated upon the application of eco-furnace as volume of joss paper will greatly reduce after incineration as the peak season for joss paper incineration is Festival Days and will be collected and disposed of at NENT landfill as non-inert waste. Section 5.4.19 is supplemented.
EPD (A39)	<p>viii. Please include the recycling arrangement for MSW; and</p>	The recycling arrangement for MSW are supplemented in Section 5.4.20.

Items	Departmental Comments	The Applicant's Responses
EPD (A40)	ix. The last sentence contains logic flaws, as it assumes that regular collection of municipal solid waste (MSW) by waste collectors to a landfill managed by the EPD guarantees no adverse impacts, which is not necessarily true. Additionally, it overlooks potential environmental impacts during the handling, transportation, or disposal processes.	The waste management practice is revised in Section 5.5.
EPD (A41)	<u>Land Contamination</u> 1. Section 4.2(e):  i. Please supplement the historical aerial photographs that were reviewed during the desktop study. Additionally, please provide a brief description of the land use changes over time to support the claim that no suspected land contamination activities were found; and	Historical aerial photo are supplemented in Appendix 4.1. The land use of Application Site changes from vacant to old temple “法林分院” and to existing Prajna Dhyana Temple. No potential land contamination activities found.
EPD (A42)	ii. Please revise the sentence as "Hence, no adverse impact from land contamination issue is anticipated and site investigation is considered not necessary	Relevant sentence is supplemented in Section 4.3.12.
EPD (A43)	<u>Water / Sewerage</u> 1. The proposed STW/STP for handling the sewage generated should be provided for information;	The detail calculation for the proposed Septic Tank System (STS) are shown in Appendix 2.1 of the Sewerage Impact Assessment report (see <b>Appendix VII</b> ).
EPD (A44)	2. Please advise the breakdown of the total sewage storage capacity of the proposed development (i.e. number and capacity of the proposed Chemical Toilets and Sewage Holding Tank(s));	Chemical toilets and sewage holding tanks are not proposed.
EPD (A45)	3. Table 4.1 - Please advise the commercial activity referred from Table T-2 of the GESF;	The commercial activity referred from Table T-2 of the GESF is J11 Community, Social & Personal Services.
EPD (A46)	4. Table 4.1 - For commercial activity – restaurants and hotels, the unit flow factor	Noted.

Items	Departmental Comments	The Applicant's Responses
	should be should be 1.58m <sup>3</sup> /day/person rather than 0. 5m <sup>3</sup> /m <sup>2</sup> /day according to Table T-2 of GESF;	
EPD (A47)	5. Table 4.1 - According to the referred EIA report (i.e. EIA-236/2016 - Site Formation and Associated Infrastructural Works for Development of Columbarium, Crematorium and Related Facilities at Sandy Ridge Cemetery), the unit flow factor for visitor adopted was 0.01m <sup>3</sup> /person/day rather than 0.0028m <sup>3</sup> /person/visit; and	The unit flow factor for visitor is revised to 0.01 m <sup>3</sup> /day.
EPD (A48)	6. Appropriate mitigation measures from ProPECC PNs 2/24 and 1/23 under Construction and Operation Phases should be implemented to avoid, prevent and minimise the potential water quality impacts. And, Best Management Practices (BMPs) for stormwater discharge to minimize stormwater pollution arising from the site shall be incorporated.	Mitigation measures are added in Section 2.5.5.
EPD (A49)	<u>Others</u> 1. To facilitate review, please also provide softcopy of the report (in pdf), Response to Comments and modelling files / calculation spreadsheets (if any), and highlight the revised / updated content of the report in next submission.	Noted.

## 2.4 Responses to Comments from Fire Services Department

Items	Departmental Comments	The Applicant's Responses
<b>Comments Received on 15.9.2025</b>		
FSD (A1)	1. No specific comment on the captioned application subject to water supplies for firefighting and fire service installations being provided to the satisfaction of the Director of Fire Services; and	Noted.
FSD (A2)	2. 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.

## 2.5 Responses to Comments from Food and Environmental Hygiene Department

Items	Departmental Comments	The Applicant's Responses
<b>Comments Received on 15.9.2025</b>		
FEHD (A1)	<p>1. Under the Private Columbaria Ordinance (the PCO), only private columbaria that have obtained a licence may sell or newly let out niches. Any private columbarium which applies for a licence must comply with the Town Planning Ordinance (Cap. 131) and other requirements prescribed in the PCO or specified by the Private Columbaria Licensing Board (the PCLB), including land-related, building-related, right to use the columbarium premises, deed of mutual covenant (if applicable), fire safety, etc. Section 18(2) of the PCO stipulates that the PCLB may grant a licence only if a management plan submitted by the applicant has been approved by the PCLB. The management plan submitted to the PCLB should cover matters including traffic and public transport arrangement or management, crowd management, manpower deployment on peak grave sweeping days or periods and other days or periods, etc. For cases in which planning permission has been given by the Town Planning Board (TPB), the management plan should include the crowd and traffic management measures accepted (and the conditions imposed) by the relevant departments and the TPB when the TPB approved the planning application. In considering the management plan submitted by a licence applicant, the PCLB will take into account comments provided by concerned departments including Transport Department, the Police, Fire Services Department and the Planning Department. If a licence application is approved by the PCLB, the Private Columbaria Affairs Office will oversee the monitoring of the licensee's implementation of the approved management plan in coordination with other concerned departments;</p>	Noted.



Items	Departmental Comments	The Applicant's Responses
FEHD (A2)	2. The activities organized in future by the project proponent / operator / temple management at the proposed partial redevelopment under application should not cause any environmental nuisance to the surroundings;	Noted.
FEHD (A3)	3. For any wastes generated from the activities or visitors in future at the proposed partial redevelopment, the project proponent / operator / temple management should handle on their own / at their expenses;	Noted.
FEHD (A4)	4. According to our record, the private columbarium, namely "Prajna Dhyana Temple Ksitigarbha Bodhisattva Hall (般若禪寺地藏殿)", situated at Ground Floor, Prajna Dhyana Temple Ksitigarbha Bodhisattva Hall, No.100 Shek Mun Kap, Tung Chung, Lantau Island, Islands (Lot No. 117 (part) in D.D. 2 Tung Chung) , has submitted a set of the specified instrument (SI) application (viz. an Exemption and Temporary Suspension of Liability (TSOL)) in respect of a pre-cut-off columbarium to the PCLB and the applications are being processed by the Private Columbaria Affairs Office (PCAO). With reference to the SI application, the name of PC under the SI application is "Prajna Dhyana Temple Ksitigarbha Bodhisattva Hall (般若禪寺地藏殿)". "Ksitigarbha Bodhisattva Hall (地藏殿)" is the columbarium building within the Prajna Dhyana Temple, and the application site boundary only covers the columbarium building only. Besides, PCLB has given (a)"Approval-in-principle for TSOL Application" to the subject columbarium with a validity period of 3 years from 25 March 2021 to 24 March 2024, and subsequently being renewed with a validity period of 3 years from 25 March 2024 to 24 March 2027 and (b)"Approval-in-principle for Exemption Application" to the subject columbarium with a validity period of 1 year from 30 August 2024 to 29 August 2025,	Noted.

Items	Departmental Comments	The Applicant's Responses
	which has been extended for a validity period of 6 months from 30 August 2025 to 28 February 2026. Giving the "Approval-in-principle for TSOL Application" and "Approval-in-principle for Exemption Application" do not mean that the application for an Exemption in respect of the subject columbarium will be approved eventually;	
FEHD (A5)	5. Based on the proposed plans submitted by the applicant in support of its SI applications, it is noted that the total number of niches proposed for the Exemption application is 872, which is the same as the existing no. of niches without the additional 6,628 niches combined for a total of 7,500 niches that proposed in this pre-submission of planning permission application. However, the niche information proposed for the Exemption application is subject to verification by the PCAO;	Noted.
FEHD (A6)	6. If the proposed additional niches were not sold before 30 June 2017, the arrangement stipulated in Chapter 18(B)(ii) under the "Application Guide for Private Columbarium Licence and other Specified Instruments" published by the PCLB is not applicable to the captioned application;	Noted.
FEHD (A7)	7. With respect of the construction of the proposed toilets in the location under application, the applicant should comply with relevant legislation. (e.g. Building (Standards of sanitary fitments, plumbing, drainage works and latrines) Regulations);	Noted.
FEHD (A8)	8. Proposed toilets should not cause any environmental nuisance to the surroundings. Preferably of permanent in nature, connected to public sewer if available or well planned to connected to the public sewer network in the future; and	Noted.

Items	Departmental Comments	The Applicant's Responses
FEHD (A9)	9. The project proponent / operator / temple management should reasonably estimate the number of visitors/ toilet users and provide sufficient toilet compartments for use by their visitors/toilet users.	Noted.

## 2.6 Responses to Comments from Geotechnical Engineering Office, Civil Engineering and Development Department

Items	Departmental Comments	The Applicant's Responses
<b>Comments Received on 15.9.2025</b>		
GEO (A1)	There is a ground outside the Site but in the same catchment that is at an angular elevation of more than 20 degrees from the Site and there is ground sloping at more than 15 degrees within 50m upslope of the Site. Pursuant to GEO Advice Note for Planning Applications under Town Planning Ordinance (Cap. 131), a Geotechnical Planning Review Report (GPRR) is required for the captioned application. Essential contents of a GPRR are given in the attached GEO Advice Note.	Noted. Please find attached the Geotechnical Planning Review Report attached in <b>Appendix IX</b> .

## 2.7 Responses to Comments from Home Affairs Department

Items	Departmental Comments	The Applicant's Responses
<b>Comments Received on 15.9.2025</b>		
HAD (A1)	1. As the Prajna Dhyana Temple has already been established for a long time, it is unlikely to trigger strong local sentiment among the nearby villagers. Still, the applicant is advised to seek the views and comments from the Tung Chung Rural Committee (TCRC) and the village representatives of nearby villages such as Shek Mun Kap and Shek Lau Po.	Noted.

## 2.8 Responses to Comments from Hong Kong Police Force

Items	Departmental Comments	The Applicant's Responses
<b>Comments Received on 15.9.2025</b>		
HKPF (A1)	1. Please clarify number of blocks involved in the proposed development (whether it is 7 blocks as shown on page 3 in section 1.3 "The Present Scheme" in the Planning Statement; or 8 blocks as shown on page 6 in section 3.1 "The Proposed Development" in Appendix III Traffic Impact Assessment);	Please be clarified that the number of blocks involved in the proposed development is 7. Relevant pages in the Traffic Impact Assessment (TIA) report have been amended accordingly (see <b>Appendix V</b> ).
HKPF (A2)	2. Regardless of the house rules prohibiting the use of private vehicles and the provision of shuttle buses, it is unavoidable that some visitors may insist driving to the columbarium and thus causing illegal parking and other traffic issues (i.e. traffic congestion) to the area and its vicinity. Congestion could arise at Shap Mun Kap Road junction where it intersects with the small unnamed road leading to the entrance of the temple. This congestion may significantly disrupt traffic flow at the nearby Tung Chung Road roundabout, which is less than 100 meters from the unnamed road. Tung Chung Road is the only vehicular road running between Tung Chung and Lantau Island South. Such disruptions could lead to serious delays and safety hazards. What measures can the applicant take to prevent such incidents;	Please be advised that during the festival period (i.e. two weekends before and two weekends after the Festival Day, and other public holidays), all visitors must make reservation in advance of visiting the temple as signed up in the Sales Agreement. To access the temple, all visitors must take the free shuttle bus service provided by the Applicant with their valid booking confirming. Visitors are not allowed to enter the temple by other means of traffic except by taking the shuttle bus. With only shuttle bus serving the site, and all visitors are only allowed to use the shuttle bus to access the site, it is anticipated that there would be no adverse traffic impact to Shek Mun Kap Road and Tung Chung Road induced by this application.
HKPF (A3)	3. In light of the insufficient open area for maneuvering a certain number of vehicles and the lack of parking spaces at the temple and its vicinity, a shuttle bus service is a primary requirement for the application unless alternative solutions are proposed;	Noted. As per response to comment 2 above, please be advised that all visitors must use take the shuttle bus to access the temple during festival period.
HKPF (A4)	4. Other than the proposed shuttle bus services, would there be any special parking arrangement for private vehicles of members of the Temple during periods of Ching Ming and Chung Yeung Festival;	As per response to comment 2 above, please be advised that all visitors must use take the shuttle bus to access the temple during festival period. No parking space will be provided to visitors during festival period.
HKPF (A5)	5. It is noted the proposed shuttle bus would travel between the temple and MTR Tung	Management staff and signages will be provided at the pedestrian route from MTR station to the

Items	Departmental Comments	The Applicant's Responses
<b>Comments Received on 15.9.2025</b>		
	Chung Station (or MTR Tung Chung West Station). Given the estimated crowd size during festival periods as stated in the TIA, please kindly advise the crowd management measures (e.g. marshal deployment, public announcement, signage installation etc.) at both points;	shuttle bus station.
HKPF (A6)	6. Please advise the exact location of the proposed pick up and drop off point at Citygate North and whether approval from relevant authority is required;	The proposed pick-up/drop-off point during the temporary stage before commissioning of Tung Chung West Station is revised to the bus lay-bys at Shun Tung Road. Please refer to the updated Section 4.4 and Figure 4-2 for details. The pick-up/drop-off point at Citygate North would be an alternative location.
HKPF (A7)	7. A contradiction in relation to the period of Peak Grave Sweeping Days between the Traffic Impact Assessment (4.1.2) and the Planning Statement (3.5a) was found. The Police will accept that the period should be fixed in according to the period mentioned in the Planning Statement, i.e. two weekends before and two weekends after the Festival Day and other public holidays within the period. Please clarify;	The festival period is revised to 2 weekends before and 2 weekends after the Festival Day and other public holidays. Please refer to Section 4.1.2 of the updated TIA report.
HKPF (A8)	8. Although the applicant states that the holding capacity of the site is not more than 250 persons at any time, and allowing 300 visitors to enter during each time slot, it is essential to reconsider this approach. Given the number of days during the Peak Grave Sweeping Days, the total number of niches, and the expected visitor count, the applicant should reduce the number of visitors per time slot. The adjustment would help evenly distribute the visitors across peak days, minimize the possibility of traffic congestion nearby, and provide a buffer for the shuttle bus service, addressing issues such as visitors' waiting time at the pick up point, delays due to traffic jams, and miscalculations in travel time; and	As per response to comment 7 above, the festival period is revised to 2 weekends before and 2 weekends after the Festival Day. Also, the nos. of visitors per time slot is reduced to 250 persons, and the visiting time per session is revised to 60 minutes.

Items	Departmental Comments	The Applicant's Responses
<b>Comments Received on 15.9.2025</b>		
HKPF (A9)	9. Police officers of Lantau North Division are deployed for crowd management at Zone 18 cemetery during the period of Ching Ming and Chung Yeung Festival. The ancillary columbarium is expected to attract increased crowd and traffic flow during the concerned period of time and thus requiring extra police officers. Specific plan cannot be provided at this early stage.	Noted.

## 2.9 Responses to Comments from Housing Department

Items	Departmental Comments	The Applicant's Responses
<b>Comments Received on 26.9.2025</b>		
HD (A1)	1. Considering the captioned application site is in close proximity to planned public housing developments (PHDs) in Tung Chung Area 46 (TC 46) and Area 42 (TC 42), the applicant should ensure suitable technical assessments and mitigation measures are conducted/implemented as appropriate to the satisfaction of relevant B/Ds such that no adverse impacts are brought to the future residents of PHDs in proximity during construction/operation stages;	Noted.
HD (A2)	2. Table 6-3 of Appendix III (Traffic Impact Assessment) (Page 16):  i. Row "Area 23 Phase 1" - According to approved planning brief for Tung Chung Area 23 Phase 1, 10% deviation in proposed number of flats (450 flats) is allowed. As such, please adopt +10% buffer in number of flats (i.e. 450 flats + 10% buffer; 495 flats) for infrastructure/technical assessments; and	Noted. The TIA is updated with the assumption of 495 flats at Area 23 Phase 1.
HD (A3)	ii. Row "Government Land at Area 42 and Area 46, Tung Chung, Lantau [A/I-TCTC/67]" - Instead of completion in 2028/29 as stated, please note that planned public housing development in TC 42 would be completed in two	Noted. The description in Table is updated in the updated TIA report.

Items	Departmental Comments	The Applicant's Responses
	phases in 2027/28 and 2028/29 according to the approved s.16 application (No. A/I-TCTC/67).	

## 2.10 Responses to Comments from Highways Department

Items	Departmental Comments	The Applicant's Responses
<b>Comments Received on 15.9.2025</b>		
HyD (A1)	1. Please provide swept path of vehicles accessing the proposed run-in/out to demonstrate the feasibility of proposed arrangement;.	Please refer to Appendix D for the swept path demonstration in the updated TIA report.
HyD (A2)	2. Proposed run-in/out should be designed and constructed up to highway standard;	Noted.
HyD (A3)	3. Please assess if waiting area inside the lot is sufficient during peak hours so that visitors will not queue on public footpath at Shek Mun Kap Road; and	Please refer to Figure 3-1 which demonstrates the waiting area inside the lot. According to the latest proposal in the updated TIA, with visit by appointment, the maximum visitors per each session is 250 people, which is same as the maximum holding capacity of the columbarium building. It is anticipated that all visitors can enter the columbarium building at their sessions without waiting. Nevertheless, a waiting area of 126 m <sup>2</sup> which can accommodate 104 nos. of visitors with level of service (LOS) grading A.
HyD (A4)	4. Traffic impact assessment based on the assumption visitors travelling only by the designated shuttle bus is unrealistic. Specific traffic arrangement on grave sweeping days should be proposed to minimize traffic impact especially the nearby roundabout.	Please be advised that during the festival period (i.e. two weekends before and two weekends after the Festival Day, and other public holidays), all visitors must make reservation in advance of visiting the temple as signed up in the Sales Agreement. To access the temple, all visitors must take the free shuttle bus service provided by the Applicant with their valid booking confirming. Visitors are not allowed to enter the temple by other means of traffic except by taking the shuttle bus. With only shuttle bus serving the site, and all visitors are only allowed to use the shuttle bus to access the site, it is anticipated that there would be no adverse traffic impact to Shek Mun Kap Road and Tung Chung Road induced by this application. No parking space will be provided to visitors during festival period.

## 2.11 Responses to Comments from Lands Department

Items	Departmental Comments	The Applicant's Responses
<b>Comments Received on 26.9.2025</b>		
LD (A1)	1. The Site comprises six private lots that are old scheduled lots all in DD 2 TC held under Block Government Lease ("BGL"), of which Lot Nos. 112 and 114 are demised for "agricultural" use while Lot Nos. 113RP, 116, 117 and 118 are mixed for "agricultural" and "house" uses. Lot 117 is currently subject to a Short Term Waiver ("STW") for the purpose of a columbarium;	Noted.
LD (A2)	2. Comparing the total area and boundary of the Site to the Government's records, discrepancies are found. For example, the areas of Lot Nos. 116 and 117 which are 487.4m <sup>2</sup> and 366.4m <sup>2</sup> respectively and also their boundaries are inconsistent with the Government's records. In this connection, the northern portion of the proposed Block A as well as the eastern portion of the proposed Blocks B and C will encroach upon Government land. Apart from the above, the total built-over area of the proposed partial redevelopment (i.e. "Site Coverage" with about 1,150.68m <sup>2</sup> in total in the Table 3.1 of the Planning Statement) exceeds the permitted built-over area limit under the BGL. In view of the above, the area, boundary and permitted built-over-area of the lots under the Application have to be verified at the land exchange stage if any land exchange is applied for by the Applicant to the Lands Department ("LandsD");	Noted. The area, boundary and permitted built-over-area of the lots under the s.16 application will be verified at the land exchange stage.
LD (A3)	3. In Table 3.2 "Development Parameters of the Proposed Facilities" in the Planning Statement, the total GFA as stated should be equivalent to about 4,059.81m <sup>2</sup> instead of 2,796.53m <sup>2</sup> . The applicant is requested to clarify the above;	Typo. 2,796.53m <sup>2</sup> is correct under the pre-submission.  Table 3.2 has been further updated to comply with the latest scheme.



Items	Departmental Comments	The Applicant's Responses
LD (A4)	4. Some of the existing structures within the Site are covered by Squatter Control Survey Records ("SC Survey Records"), subject to final verification of the conformity status. However, the proposed partial redevelopment plan includes the conversion of existing buildings and/or changes to their use. As such, upon approval of the land exchange if any land exchange is applied for by the Applicant to the LandsD, the related structures will no longer retain with the status of Surveyed Squatter Structures, and the respective records will be cancelled correspondingly;	Noted.
LD (A5)	5. The existing columbarium building (i.e. Block B – "Ex. Columbarium"), which is proposed to be preserved, is subject to the STW. However, the area of Ex. Columbarium indicated in Table 3.2 (i.e. 49.05m <sup>2</sup> ) and that as derived from the dimensions of 4.85m x 10.23m on "Plan F: Temple Floor Plan (G/F)" of the Planning Statement (i.e. 49.6m <sup>2</sup> ) differ from the building area of 49m <sup>2</sup> permitted in the STW. Should the area of Ex. Columbarium deviate from the permitted area specified in the STW, the STW will no longer be valid;	After further checking, the building area of the existing columbarium building has been revised to 49m <sup>2</sup> . Table 3.2 and Plan F have been amended accordingly.
LD (A6)	6. In respect of the proposed columbarium use, the Private Columbaria Affairs Office should be consulted;	Noted.
LD (A7)	7. Regarding the traffic management measures of proposed shuttle bus services provisions mentioned at para. 3.2.1 and the "Crowd Management Plan" in Chapter 4 of the TIA at Appendix III of the Planning Statement, please note that I am not prepared to impose any conditions under the land exchange if applied for in this respect. You should explore other means to enforce any traffic management requirements, if necessary; and	The traffic and crowd management plan as proposed in the Traffic Impact Assessment will be incorporated in the Management Plan, which is a mandatory requirement for the private columbaria licensing (PCL) application. It will be monitored by the Private Columbaria Affairs Office if the PCL application is eventually approved by the Private Columbaria Licensing Board.

Items	Departmental Comments	The Applicant's Responses
LD (A8)	<p>8. If the planning permission is subsequently given to the Application for the proposed partial redevelopment, the lot owners shall apply to LandsD for a land exchange to effect the proposed partial redevelopment. However, I would advise that the application for a land exchange will only be considered upon receipt of the formal application from the lot owners and there is no guarantee that the application will be eventually approved. Should the land exchange be processed, upon surrender of the existing lots, any existing waiver, and SC Survey Records pertaining to those existing lots will be terminated concurrently. Such land exchange application if received by LandsD will be considered by LandsD acting in the capacity as the landlord at its sole discretion. In the event that such application is approved, it would be subject to such terms and conditions including, among others, the payment of premium in full market value and administrative fee as may be imposed by LandsD at its sole discretion.</p>	Noted.

## 2.12 Responses to Comments from Landscape Unit, Planning Department

Items	Departmental Comments	The Applicant's Responses
<b>Comments Received on 15.9.2025</b>		
LU (A1)	1 According to the aerial photo in 2024, the Application Site (the Site) is situated in an area of miscellaneous rural fringe landscape character predominated by woodland, construction sites and village houses. The Site is occupied by an existing temple and a few temporary structures. The proposed redevelopment of the existing temple and ancillary columbarium are considered not entirely incompatible with the surrounding landscape character;	Noted.
LU (A2)	2 According to the Planning Statement, 16 existing trees are identified within the Site. Four of them (T17, T49, T59 & T71) affected by the redevelopment are proposed to be transplanted within the Site, while the remaining trees are proposed to be retained. Temple courtyard with lotus pond, memorial garden and buffer planting are proposed in the Preliminary Landscape Plan (Plan Q). Significant adverse impact on landscape resources arising from the proposed development is not anticipated;	A detailed tree survey has been conducted for the 16 existing trees within the site, and updated tree preservation proposals are presented at the enclosed <b>Appendix IV</b> , based on these survey results. As noted, significant adverse impact on landscape resources is not anticipated, on implementation of the proposed landscape scheme.
LU (A3)	3 Table 3.3 (Basic Information on the Existing Trees within the Site Boundary) – Please specify the species of the existing trees in the table;	Please refer to tree assessment schedule contained at <b>Appendix IV</b> .
LU (A4)	4 Please provide photos showing the condition of the existing trees;	Please refer to existing tree photographic record contained at <b>Appendix IV</b> .
LU (A5)	5 According to the Preliminary Landscape Plan (Plan Q), new trees are proposed to be planted within the Site. Please provide the estimated quantity, size and the proposed species of those new trees. Kindly note that native tree species are recommended; and	Please refer to new tree planting proposal contained at <b>Appendix IV</b> .

Items	Departmental Comments	The Applicant's Responses
LU (A6)	6 The Applicant is reminded that approval of the S.16 application under Town Planning Ordinance does not imply approval of the site coverage of greenery requirements under BD's APP PNAP-152. The site coverage of greenery calculation should be submitted separately to BD for approval. Similarly, for any proposed tree preservation/pruning/removal scheme under LandsD LAO PN No. 6/2023, the applicant is reminded to approach relevant authority direct to obtain the necessary approval.	Noted.

### 2.13 Responses to Comments from Sustainable Lantau Office, Civil Engineering and Development Department

Items	Departmental Comments	The Applicant's Responses
<b>Comments Received on 15.9.2025</b>		
SLO (A1)	2. Please find comments on the subject application in respect of the interfaces with CEDD Works Contract No. NL/2020/06 ("C6"), which is under implementation:  i. It is noted that the pedestrian access and vehicular run-in proposed by the applicant clash with retaining wall and the footpath next with the foregoing retaining wall constructed under C6;	Please refer to the updated Figure 3-1 for the latest proposal of vehicular run-in/out in the TIA report (see <b>Appendix V</b> ). The latest location of proposed vehicular access will not clash with the retaining wall and footpath constructed under C6, with reference to the latest as-built drawing obtained from RSS of C6 dated 19 Nov 2025.
SLO (A2)	ii. Please find attached a layout plan overlaying the features proposed by the applicant for change of land use of the temple and the access outside the temple newly constructed under C6 for your reference; and	Noted. Figure 3-1 are updated based on the latest as-built drawing obtained from RSS of C6 dated 19 Nov 2025.
SLO (A3)	iii. In view of the above, the applicant should coordinate with our RSS of C6 and CEDD for any interface issues as necessary. The contact point is SRE-Mr. Franklin YIM (franklin.yim@tcw.c5c6.hk).	Noted. Latest as-built drawing has been obtained from RSS of C6 dated 19 Nov 2025.

## 2.14 Responses to Comments from Transport Department

Items	Departmental Comments	The Applicant's Responses
<b>Comments Received on 26.9.2025</b>		
TD (A1)	<p>1. Traffic Impact Assessment Draft Report:</p> <p>i. Re. Para 4.3 – A limit of 300 visitors by “pre-booking system” per each 45 min. for 7500 niches seems not practical. Also the visitors would usually arrive in peak time, e.g. 10:00-14:00. It is unlikely that the system could be followed in future operation;</p>	<p>“Visit-By-Appointment” system will be implemented to control the nos. of visitors during festival period (i.e. two weekends before and two weekends after the Festival Day, and other public holidays). All visitors must make reservation in advance of visiting the temple as signed up in the Sales Agreement. The nos. of visitors and the duration of each session are updated to 250 visitors per 60-minute session.</p>
TD (A2)	<p>ii. Re. Para 4.4 – The “shuttle bus only policy” cannot guarantee that public not using nearby public roads or public transport to access the site. Relevant traffic impact should be assessed, including the possible pedestrian flow directed from the loading/unloading points at adjacent area, e.g. Mun Tung Estate and future Area 42 development;</p>	<p>To access the temple, all visitors must take the free shuttle bus service provided by the Applicant with their valid booking confirming. Visitors are not allowed to enter the temple by other means of traffic except by taking the shuttle bus. With only shuttle bus serving the site, and all visitors are only allowed to use the shuttle bus to access the site, it is anticipated that there would be no adverse traffic impact to Shek Mun Kap Road and Tung Chung Road induced by this application. No parking space will be provided to visitors during festival period.</p>
TD (A3)	<p>iii. Re. Table 4-2 – It is unlikely that the proposed service frequency, i.e. <i>departure every 4-5 mins, with 14 Departures per hour</i>, is achievable by fleet size of 3 vehicles only. Please clarify/supplement;</p>	<p>The nos. of visitors and the duration of each session are updated to 250 visitors per 60-minute session. The frequency of shuttle bus services is reduced to every 6-7mins, with 9 departures per hour, which is considered achievable by fleet size of 3 vehicles.</p>
TD (A4)	<p>iv. Re. Para 5.1 / Table 5-1 – Trip rate of columbarium with similar scale, i.e. 7500 niches of this application, should be adopted for reference</p>	<p>The total nos. of niches of the reference columbarium are supplemented for information. Please be advised that the scale of Filial Park and Fat Yuen Ching Shea are considered similar to this application. In addition, trip rate at Po Fook Hill Columbarium and Sai Lam Temple are also included for reference.</p>

Items	Departmental Comments	The Applicant's Responses
TD (A5)	v. Re. Para 6 and relevant figures – The road networks considered in the assessment are not update as per development of CEDD's Tung Chung New Town Extension (TCNTE) project in Tung Chung West. The new roads under TCNTE project have not been demonstrated. Please review;	The road network with new roads under TCNTE project is presented in the updated traffic flow figures for reference. Please note that the shuttle bus service is proposed to via Tung Chung Road and Yu Tung Road which would bypass the new roads under TCNTE project.
TD (A6)	vi. Re. Figures 3.1 – Please demonstrate its connection of access road with the updated road networks under TCNTE project;	The latest as-built drawing of the access road under TCNTE project has been obtained from the representative of CEDD (RSS of Contract C6), and Figure 3.1 is updated to demonstrate the connection of the access road and the proposed vehicular and pedestrian access.
TD (A7)	vii. Re. Figures 3.1 – It is noted that the waiting area (with capacity of 116 people c.f. proposed limit of 300 visitors) is proposed within the development. Please clarify its sufficiency and demonstrate that the queueing arrangement, in particular before the entrance, would not affected the public roads adjacent to the site;	<p>The nos. of visitors and the duration of each session are updated to 250 visitors per 60-minute session, which is same as the maximum holding capacity of the columbarium building. It is anticipated that all visitors can enter the columbarium building at their sessions without waiting. Nevertheless, a waiting area of 126 m<sup>2</sup> which can accommodate 104 nos. of visitors with level of service (LOS) grading A.</p> <p>In addition, please note that all visitors would use the shuttle bus to access the site, with 3 nos. of shuttle bus loading and unloading spaces provided within the site. As a result, no visitors would be queueing on public roads adjacent to the site.</p>
TD (A8)	viii. About the proposed administrative measures, e.g. <i>"shuttle bus only policy"</i> , <i>"pre-booking system"</i> , <i>"crowd management plan"</i> etc., please advise if relevant management duty could be imposed under the land sales conditions instead of regulated by applicant's house rules only. If not, the assessment should demonstrate that the traffic impact of subject development is manageable without any of the above control measures;	Niche purchasers are required to accept a set of Sale Agreement at time of purchase, which including the House Rules, which are legally binding on the purchasers.

Items	Departmental Comments	The Applicant's Responses
TD (A9)	<p>2. Proposed Shuttle Bus Services (Section 4.4, Pages 14–15):</p> <p>i. Shuttle Services to MTR Tung Chung West Station</p> <p>(a) The Applicant proposes free shuttle bus services between the Application Site and MTR Tung Chung West Station (scheduled for completion in 2029). However, please note that there is no Public Transport Interchange (PTI) at Tung Chung West Station and the roadside layby on Yu Tung Road will be used as franchised buses bays. The proposed shuttle routes will therefore be subject to the availability of a suitable boarding/alighting area in the vicinity; and</p>	<p>It is noted that Tung Chung West Station is scheduled to be completed in 2029, while the schedule of PTI at Tung Chung West Station is pending. The pick-up/drop-off point for shuttle bus route to Tung Chung West Station will be using available public lay-bys adjacent Tung Chung West Station, with the exact location for pick-up and drop-off would be kept in view during next stage which TCMP should be submitted to relevant authorities for consideration.</p>
TD (A10)	<p>ii. Shuttle Arrangements Services to MTR Tung Chung Station (Pre-Completion of Tung Chung West Station)</p> <p>(b) For the interim period before the completion of MTR Tung Chung West Station, the Applicant proposes using the Citygate North Drop Off Area near Man Tung Road as the pick-up/drop-off point. Please note that this area is privately managed and owned by Citygate. The Applicant must seek formal consent from Citygate management for the use of this area for shuttle operations.</p>	<p>The proposed pick-up/drop-off point during the temporary stage before commissioning of Tung Chung West Station is revised to the bus lay-bys at Shun Tung Road. Please refer to the updated Section 4.4 and Figure 4-2 for details. The pick-up/drop-off point at Citygate North would be an alternative location.</p>

## 2.15 Responses to Comments from Urban Design Unit, Planning Department

Items	Departmental Comments	The Applicant's Responses
<b>Comments Received on 15.9.2025</b>		
UD (A1)	1 Given the bell tower is a relatively tall structure when comparing to the existing structures, the Consultant should further elaborate its potential visual impact to the surrounding areas and any measures to minimize its visual impact;	In order to minimise the potential visual impact arising from the development, the height of the proposed bell tower has been reduced to 14m.
UD (A2)	2 Table 3.1 – Please clarify whether the building height should be 'not exceeding 18m' rather than '13m';	Under the latest development scheme, the building height of the proposed development would not be exceeding 14m (i.e. 13.8m).
UD (A3)	3 Section 4.3(b)(i) – The proposed 18m bell tower is taller than the existing buildings/structures and other proposed buildings in the application. As such, claiming that the maximum BH similar to the existing low-rise built form might not be entirely accurate; and	Under the latest development scheme, the height of the proposed bell tower would be similar to the main temple after renovation and also other proposed buildings in the application.
UD (A4)	4 Section 4.3(b)(iii) – It appears that 18m should be used when in determining the assessment area according to the TPB-PG No.41, or if not, please provide justification.	Under the latest development scheme, the building height of the proposed development would not be exceeding 14m (i.e. 13.8m). Thus, 14m has been used when in determining the assessment area according to the TPB-PG No.41.

## 2.16 Responses to Comments from Water Supplies Department

Items	Departmental Comments	The Applicant's Responses
<b>Comments Received on 15.9.2025</b>		
WSD (A1)	Please also assess whether there will be any impact on the existing water supply network due to the re-development in the report.	A Water Supply Impact Assessment report is supplemented. The assessment results show that the peak water demand from the proposed development are 1,338.4m <sup>3</sup> /day which only accounts for the existing Tung Chung No. 2 Fresh Water Service Reservoirs of 3.3%. Given that the contribution is not significant, the proposed development would unlikely pose any adverse impact to existing freshwater supply system.