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Timothy Wai Pui WU/PLAND

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寄件者: king king <[REDACTED]>  
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收件者: tpbpd/PLAND  
副本: Timothy Wai Pui WU/PLAND; Brian Ching Hong CHAN/PLAND  
主旨: A/NE-TKLN/99  
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類別: Internet Email

Dear Sir,

Please see attached response to the Government departments. Thank you.

Best Regards,

Patrick Tsui

Mobile: [REDACTED]

Total: 68 pages

Date: 24 August 2025

TPB Ref.: A/NE-TKLN/99

By Email

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

Dear Sir,

**Proposed Temporary Battery Recycling Plant and Associated Filling of Land for a Period of 3 Years at Lot 215 RP (Part) in D.D.78, Ta Kwu Ling, N.T.**

Our response to the comments of the Director of Environmental Protection (DEP) is found in the attachment.

DEP's comments	Applicant's response
1. The applicant shall advise further information on the operation of the proposed temporary battery recycling plant (e.g. type of batteries to be processed, treatment process, etc.) and supplement further details in the Planning Statement to demonstrate the environmental acceptability of the proposed development.	Please see the workflow in the attachment.
2. The applicant shall advise the measures for sewage treatment and disposal (e.g. septic tank and soakaway system). ProPECC PN 1/23 has been superseded by ProPECC PN 5/93, please update Section 2.4.1 of the Planning Statement accordingly.	Para 2.4.1 of the Planning Statement has been updated.
3. It is noted from Section 2.4.2 of the Planning Statement that residential settlements were found to the east. Please clarify and update as necessary.	Noted and please see attachment.
4. I refer to the Further Information (FI) (Landfill Gas Hazard Assessment Report) submitted by the applicant to further support the s.16 application No. A/NE-TKLN/99.	

<p>5. Please find below our comments for the applicant's follow up please:</p> <ul style="list-style-type: none"> <li>· Section 2.1.1: The total site area and landfilling area of NENT should be 95 ha and 60 ha respectively.</li> <li>· Section 2.2.3: Please revise the first sentence as "NENT Landfill includes a leachate treatment plant at the northwest corner of the site with a treatment capacity of around 3,000 m<sup>3</sup>/day".</li> <li>· Section 5.1.2: On the first bullet concerning methane, please consider whether the word "or" should be used instead of "and" since 0-100% v/v range would make the LEL range requirement redundant.</li> <li>· Section 6.1.2: Please be advised to submit a detailed qualitative landfill gas hazard assessment report (detailed QLFGHA report) in accordance with EPD's LFGHA Guidance Note for EPD's approval when the detailed design of the proposed development is available, but no later than 3 months before the commencement of site formation works.</li> </ul>	
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Our response to the comments of the DAFC is as follows:

DAFC's comments	Applicant's response
<p>The subject site falls within the "AGR" and "OU(Landfill)" zones and is generally abandoned. The agricultural activities are active in the vicinity, and agricultural infrastructures such as road access and water source are also available. The subject site can be used for agricultural activities such as open-field cultivation, greenhouses, plant nurseries, etc. As the subject site possesses potential for agricultural rehabilitation, the proposed development is not supported from agricultural perspective.</p>	<p>The applicant's business is affected by the land resumption programme in Yuen Long so that it is required for the relocation of the applicant's business to another site for the continual operation of the affected business. The applicant was therefore consulted Development Bureau (DEVB) for the suitability of the application site for the relocation of the proposed development from Yuen Long to North District. DEVB replied the applicant that the application site is not unsuitable for the relocation so that the applicant submitted the current application for the approval of the Town Planning Board. Due to the land resumption for good of the public in Yuen Long, the current application</p>

	worths sympathetic approval.
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Our response to the comments of the DLO/N is as follows:

DLO/N's comments	Applicant's response
<p>1. DLO/N has adverse comment on the captioned planning application.</p> <p>2. The application site comprises Old Schedule Agricultural Lot held under the Block Government Lease which contains the restriction that no structures are allowed to be erected without the prior approval of the Government. The proposed ingress/egress of the application site is required to pass through Government land (GL) but no right of access via GL is granted to the application site.</p> <p>3. The following irregularity not covered by the subject planning application has been detected by his office.</p> <p><u>Unauthorised structure within the said private lot not covered by the planning application</u></p> <p>There is an unauthorized structure within Lot No. 215 RP in DD. 78 not covered by the subject planning application. The lot owner should immediately rectify the lease breaches and his office reserves the rights to take necessary lease enforcement action against the breaches without further notice.</p> <p>4. The lot owner/applicant shall either (i) remove the unauthorised structure not covered by the subject planning application immediately; or (ii) include the unauthorised structure in the subject planning application for the further consideration by the relevant departments and, subject to the approval of the Town Planning Board to the planning application which shall have reflected the rectification as aforesaid required, apply to his office for Short Term Waiver (STW) to permit the structures erected/to be erected. The application for STW will be considered by the Government in its capacity as a landlord and there is no guarantee that it</p>	<p>It is noted that there is a strip of Government land between the application site and the existing road. The applicant wishes to apply for the right to access the application site through the strip of adjoining Government land.</p> <p>The applicant will remove the unauthorized structure at the application site. For the proposed temporary structures proposed in the proposed layout plan, the applicant will apply for Short Term Waiver to cover all the temporary structures as shown in the proposed layout plan prior to the erection of them.</p>

<p>will be approved. The STW, if approved, will be on whole lot basis and subject to such terms and conditions including the payment of back—dated waiver fee from the first date when the unauthorised structure was erected and administrative fee as considered appropriate to be imposed by LandsD. In addition, LandsD reserves the right to take enforcement action against the lot owner for any breach of the lease conditions, including the breaches already in existence or- to be detected at any point of time in future. Besides, given the proposed use is temporary in nature, only erection of temporary structure(s) will be considered.</p> <p>5. Unless and until the unauthorised structure is duly rectified by the lot owner/applicant or entirely included in the subject planning application, please take it as his office's adverse comment to the application which must be brought to the attention of the Town Planning Board when they consider the application.</p>	
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Our response to the comments of the Transport Department is found in the attachment.

Transport Department's comments	Applicant's response
<p>1. The applicant should provide a proposal and advise its adequacy on the vehicular access arrangement including the local access road leading to the ingress/egress points of the development;</p> <p>2. The applicant should seek comments from LandsD for the proposed local access road linking the development passing through government land, and should have obtained no objection from LandsD on the land matters to validate the feasibility for the use as access road;</p> <p>3. The applicant shall demonstrate the satisfactory maneuvering of the vehicles entering and exiting the subject site, maneuvering within the subject site and into / out of the parking preferably using the swept path analysis;</p>	<p>Noted and please see attached.</p> <p>It is noted that there is a strip of Government land between the application site and the existing road. The applicant has applied for the right to access the application site through the strip of adjoining Government land in his reply to the DLO/N's comments.</p> <p>Noted and please see attached.</p>

4. The applicant shall advise the measures for preventing illegal parking of visitors' vehicles outside the subject site;	Noted and please see attached.
5. The applicant shall advise the management/control measures to be implemented to ensure no queuing of vehicles outside the subject site; and	Noted and please see attached.
6. The proposed vehicular access between Lin Chuk Road and the application site is not managed by TD. The applicant should seek comments from the responsible party.	Noted.

Should you have any enquiries, please feel free to contact our Mr. Patrick Tsui at 5114 9258 at your convenience.

Yours faithfully,



Patrick Tsui

c.c. Sha Tin, Tai Po and North District Planning Office (Attn: Mr. Timothy WU) – By Email