Agreement No. CE 79/2023 (GE)
Underground Quarrying at Tsing Yi North – Investigation, Design and Construction
S.16 Planning Application No. A/TY/154
Responses to Comments from Government Departments

No.	Comments Received	Date Received	Reference
1.	Comments from the Port Works Division, Civil Engineering and Development Department Contact Person: Miss Rosita SO/ 2762 5531	21 September 2026	NA by Email
2.	Comments from Railway Development Division 1-1, Railway Development Office, HyD Contact person: Ms. Kristin Lai/ 3525 1930	21 September 2026	NA by Email
3.	Comments from Transport Department (TD) Contact person: Mr. CHIAO Ying Kit/ 2399 2496	23 September 2026	NA by Email
4.	Comments from Environmental Protection Department (EPD) Contact person: Ms. Tiffany CHEUNG/ 2835 1836	24 September 2026	NA by Email
5.	Comments from FSD Contact person: Mr. LAM Ho / 2733 7758	29 September 2026	NA by Email
6.	Comments from Kwai Tsing District Office, Home Affairs Department Contact person: Mr. Percy LIU/ 2494 4577	29 September 2026	NA by Email
7.	Comments from Planning Department Contact person: Mr. Cecil CHOW/ 2417 6657	9 October 2026	NA by Email
8.	Comments from Marine Department Contact person: Mr. KT Poon/ 2852 4453	2 October 2026	NA by Email

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1.	**From : Comments from the Port Works Division, Civil Engineering and Development Department** **Contact Person: Miss Rosita SO/ 2762 5531)** **Date : 21 September 2026** **Ref : NA by Email**	
1.1	1. The concerned area fall within 30 metres behind the copeline of existing seawall, the project shall note the promulgation of Port Works Design Manual (PWDM) Part 1, Paragraph 2.11 and Appendix E on the Shoreline Management Guideline (SMG) for Coastal Development. All works, layouts, structures, and building management plans along the shoreline shall comply fully with the risk-based planning and design principles outlined in the SMG. 2. The project shall adopt a Progressive Adaptive Approach and implement an integrated strategy of "Adaptation, Resilience, and Management" (ARM) to establish multi-layered protection against extreme weather conditions 3. The applicant should review whether any facilities are proposed in his/her project within 30 metres of, and behind, the copeline of the existing seawall. If any are proposed, a comprehensive coastal risk assessment shall be carried out by a qualified professional in accordance with PWDM Part 1 Appendix E. The assessment shall evaluate factors including, but not limited to, extreme sea levels, storm surges, wave actions, and overtopping risks under future climate change scenarios. CEDD's agreement on the assessment shall be obtained prior to the finalisation of detailed structural designs/building plans.	The underground quarry under the TYNUQ development is located at about 85m away from the shoreline, while some ancillary and site facilities are proposed at the Ngau Kok Wan and Wok Tai Wan to support the development. In particular, Wok Tai Wan will be primarily used for stockpiling, and there will be no structures or buildings to be constructed. Those facilities are located behind 10m away from an existing seawall copeline. Findings of the Study on Shoreline Management Plan (SMP) indicate that the project site and works area are not located within the 11 coastal areas identified as requiring priority coastal improvement measures under the mid-century planning horizon. The site is not located within or close to the 26 coastal low-lying or windy residential areas where are facing coastal risks as experienced from the past typhoon events identified by the Coastal Hazard Study. The proposed facilities at Ngau Kok Wan and Wok Tai Wan will be dismantled upon completion of the quarrying. The operational period of those facilities shall expire well before the end-of-century climate change scenarios considered in the SMG. In addition, the nature of those facilities is similar to the existing operational uses by Drainage Services Department (DSD)'s Relocation of Sha Tin Sewage Treatment Works to

No.	Comments	Responses
		Caverns project, where no coastal flooding incidents have been reported since commencement of construction. Besides, the site is situated on existing sloping ground at approximately +5 mPD behind the seawall. Site formation works, where necessary, shall be carried out such that the general ground level within 30m behind the seawall copeline is approximately +5mPD or above. Owing to the elevated site levels and prevailing site topography, any surface water arising from extreme weather would be conveyed by the natural site gradient and existing drainage system. As mentioned above, no structures or buildings are proposed at Wok Tai Wan, which will primarily be used for stockpiling. The proposed land use at Wok Tai Wan is considered less vulnerable to temporary inundation arising from extreme weather events. In view of the existing shoreline protection, elevated site levels, the nature of proposed land use, and the absence of identified priority coastal hazard concerns at this location, the coastal risk is considered to be low.
2.	**From : Comments from Railway Development Division 1-1, Railway Development Office, HyD** **Contact person: Ms. Kristin Lai/ 3525 1930** **Date : 21 September 2026** **Ref : NA by Email**	
2.1	1. The proposed works falls within / in close proximity to the railway protection boundary of existing Airport Express Line and Tung Chung Line. As the operation of existing railways is not under the jurisdiction of this office, we have no comments on the proposed works from railway development point of view.	Noted.
2.2	2. With reference to DEVB TC(W) No. 1/2019 and/or Practice Note for Authorized Persons, Registered Structural Engineers and Registered Geotechnical Engineers (PNAP) APP-24, please consult MTR Corporation Limited (MTRCL) with	Noted. MTRCL was consulted separately.

No.	Comments	Responses
	respect to the operation, maintenance, safety and any future works required for the existing railways.	
3.	**From : Comments from Transport Department (TD)** **Contact person: Mr. CHIAO Ying Kit/ 2399 2496** **Date : 23 September 2026** **Ref : NA by Email**	
3.1	**General comments** (a) The Consultants are requested to incorporate their responses to comments into the main text of the TTIA report coherently to enrich its content instead of merely providing responses on a piecemeal basis. The Consultants' failure to do so will only result in our repeating the same comments.	Noted.
3.2	**Specific Comments** (b) Please indicate clearly the provision of the parking and loading/unloading spaces (mentioned in Table 3.8) and delineate the above facilities in Figure 5.2 which should be included as part of the TTIA report.	Figure 5.2 under the planning statement is revised. The same figure is added in the TTIA as Figure 3.13. Section 3.8.2 of the TTIA is revised accordingly.
3.3	(c) The egress route to Nam Wan Tunnel appears to be missing from Figures 3.8 and 3.12 of the TTIA report. Please rectify the situation.	Please be clarified that the egress route to Cheung Tsing Tunnel could not be connected to Nam Wan Tunnel. As such, the outbound traffic could only egress via Cheung Tsing Tunnel under this egress route. The routing shown in Figures 3.8 and 3.12 is consistent with Table 3.3 (Route A4) and Table 3.5 (Route B4) of the TTIA report.
3.4	(d) In Section 3.3 of the TTIA report, please specify the hourly maximum production capacity and daily operating hours of concrete batching facilities and asphalt production facilities in the report. Such information should correspond to the amount of traffic in peak hour trip generation and attraction. Please also advise whether there is any delivery of raw materials, concrete, asphalt or other materials via marine vessels. If yes, please state this in the TTIA Report as the delivery of such materials by vessels will help reduce the vehicular traffic burden on the road.	Noted. The information is provided in the remark of Table 3.2 and supplemented in Section 3.3.2.
3.5	(e) In Table 3.2 Please advise whether the amount of traffic in trip generation and attraction arising from the delivery of raw materials, ingredients and other materials for	As supplemented in Section 3.3.2, please be clarified that the assessment has already taken into account that the majority of raw materials for concrete

No.	Comments	Responses
	supporting the quarrying operations, concrete batching facilities and asphalt production facilities, etc. has been taken into account. If not, please include the above amount of traffic and re-assess the performance of the road network.	/ asphalt production would be delivered to the site by barge.
3.6	(f) The applicant's contractor should be required to submit a detailed Traffic Management Plan and traffic control proposals (in line with the assumptions on trip generation and attraction stipulated in the TTIA report) during construction/operation phases for TD's review and approval prior to the commencement of the works. The Traffic Management Plan should also contain traffic control proposals for operation procedures, real-time positioning, site traffic queues and junction restriction measures. These requirements should be regarded as the approval conditions for the subject planning application.	Noted. The corresponding requirements are already included in TTIA Sections 3.5 to 3.7.
4.	**From : Comments from EPD** **Contact person: Ms. Tiffany CHEUNG/ 2835 1836** **Date : 24 September 2026** **Ref : NA by Email**	
	Please be informed that Environmental Protection Department's (EPD) comments on the remaining aspects of the Preliminary Environmental Review (PER) will be issued under separate cover.	
4.1	1. The applicant / CEDD confirmed that there is no update in the air quality impact assessment as contained in the PER which remains identical to the pre-submission circulated to us on 28.7.2026. However, we noted that there are discrepancies illustrated below between the pre-submission submitted in July and the current version (Sep 2026).	Please refer to our responses 4.2 and 4.3 below.
4.2	2. Section 4.7.18 and 4.7.19, Table 4.25 (i) In the July submission, barium was selected as a representative pollutant for the hourly assessment, and no exceedances were predicted. In the September submission, nickel was selected instead, and exceedances were predicted at 1.5 and 5.0 mAG.	After clarifying with the Department of Health in August 2026 during the pre-submission, the typo in the hourly concentration limits for heavy metals as 0.53 from HPCL should be for Beryllium (Be) instead of Barium (Ba). Following this update, cumulative hourly Nickel concentration is presented instead of cumulative hourly Beryllium concentration as the result-to-standard ratio indicates the cumulative hourly Nickel concentration is higher than Beryllium.
4.3	(ii) In the July submission, exceedances of the annual nickel criterion were predicted at 10 mAG. In the September submission, exceedances were	Please be clarified that exceedance of the annual Nickel criterion at 15mAG is only predicted adjacent to the

No.	Comments	Responses
	predicted at both 10 and 15 mAG.	Project site but not within the Project site (See Figure 4.55).
4.4	3. Please clarify these discrepancies and submit any updated calculation spreadsheets and modelling files for checking.	No changes were made to the calculation spreadsheet and the modelling files. The previous files are still valid.
4.5	4. We will provide other comments, if any on the PER once available.	Noted.
5.	**From : Comments from FSD** **Contact person: Mr. LAM Ho/2733 7758** **Date : 29 September 2026** **Ref : NA by Email**	
5.1	1. Please be informed that we have no specific comments on the application subject to water supplies for firefighting being provided to the satisfaction of the Director of Fire Services and the relevant requirements of Highways Department and Water Supplies Department for the provision of fire mains and hydrants shall be complied with.	Water supply for fire-fighting has been considered in the Waterworks Impact Assessment which Water Supplies Department has been consulted. HyD has no comment on provision of fire mains and hydrants from highways maintenance perspective.
5.2	2. Detailed fire safety requirements will be formulated upon referral from relevant department/authority.	The proposed development is a public works construction site managed by CEDD on a government land. FSD Circular Letter No. 2/2008 - Fire Protection measures in Construction Sites will be followed.
5.3	3. Furthermore, the provision of emergency vehicular access in the subject work shall comply with the requirements as stipulated in Section 6, Part D of the Code of Practice for Fire Safety in Buildings 2011.	
5.4	4. In case the proposed tunnels involves the tunnel boring method using Tunnel Boring Machine (TBM), we may have to formulate additional fire safety requirements and/or setting up a dedicated emergency pressurized team (EPT) for the works. In general, a lead time of about one year is required to set up sufficient EPT members."	Please be clarified that TBM would not be adopted for the proposed development.
5.5	5. Below please find our proposed approval condition for subject application: • The design and provision of fire service installations and water supplies for firefighting to the satisfaction of the Director of Fire Services or of the Town Planning Board.	Noted.

No.	Comments	Responses
6.	**From : Comments from Kwai Tsing District Office, Home Affairs Department** **Contact person: Mr. Percy LIU/2494 4577** **Date : 29 September 2026** **Ref : NA by Email**	
6.1	1. It is noted that the proposed development was discussed at the District Facilities and Works Committee in April 2026 and a local consultation regarding an allocation of government land near Wok Tai Wan, Tsing Yi, as a works area from DLO/TW&KT to CEDD for the proposed development was conducted by this office in February 2026. CEDD has addressed the comments raised by the sub committee members and the objection received from a consultee of the local consultation in May 2026.	Noted.
6.2	2. We defer to relevant B/Ds for comments on technical aspects and it is trusted that the planning application will follow the requirements for public inspection under the Town Planning Ordinance (Cap. 131) and/or other guidelines set by PlanD, including consultation with the local community.	Noted.
6.3	3. In addition, please find our comments regarding the potential interface issues between the proposed development and the existing Tsing Yi Lantau Link Viewing Platform and Visitors Centre (LLVP and LLVC) as follows: Having regard to the LLVP and LLVC's proximity to ongoing quarrying and cavern operations, comprehensive environmental and traffic mitigation measures should be implemented. This is to ensure that both the daily operations of the LLVP and LLVC and the visitor experiences at the panoramic viewing platform remain undisrupted throughout the project's construction and development period. For the environmental mitigation, proactive measures are required to suppress dust and noise in the vicinity of the viewing platform. For example, the erection of temporary noise barriers to minimise noise impact and enforcing regular water spraying schedules across the construction site. For the traffic mitigation, appropriate traffic management measures must be deployed to prevent traffic congestion. This is particularly important given that the North West Tsing Yi Interchange serves as the main gateway to both the LLVP and LLVC and the neighbouring quarrying operations.	Noted. Relevant environmental and traffic mitigation measures will be implemented throughout the quarry operation. Also, according to photomontage viewing from the LLVP, the proposed development is carefully considered not to create significant visual blockage and to reduce adverse visual impact on the surrounding, the visual impact from this Viewing Point is negligible.

No.	Comments	Responses
7.	**From : Planning Department** **Contact person: Mr. Cecil CHOW/ 2417 6657** **Date : 9 October 2026** **Ref : NA by Email**	
7.1	General 1. The applicant should advise how mitigation measures from the technical assessments submitted within the current section 16 planning application be controlled/secured throughout the construction and operation phases. In particular, EPD advised the proposed development does not constitute a Designated Project under the Environmental Impact Assessment Ordinance. The applicant should advise what mechanism can all the environmental mitigation measures/implementation details as pledged under the current application be controlled/secured throughout the construction and operation phases. 2. Regarding concerns on the external appearance of Government projects, please provide reference drawings and/or elaboration on the extant safeguards to ensure compatible external appearance.	All mitigation measures identified in technical assessments submitted under the current s.16 planning application will be included as conditions in the tender for the proposed development. For the environmental mitigation measures, the Contractor shall propose the implementation details to CEDD for agreement. Where necessary, CEDD will also seek advice from EPD. Please refer to attached replacement Figures 5.5 to 5.8 in Planning Study Report. To address possible concerns about façade treatment of ancillary facilities, administrative control mechanisms in accordance with ETWB TC(W) No. 8/2005 on Aesthetic Design of Ancillary Buildings in Engineering Projects are in place to govern the aesthetic aspects (including façade treatment) of the proposed ancillary facilities.
7.2	Use of the site 2. It is expected that some "secondary" materials (such as cement and bitumen) will be transported to the Site for production together with the quarry aggregates. In this regard, please confirm that the ancillary operations will invariably use the quarried aggregates from the Site.	It is expected that all rock excavated from the underground quarry will be processed through the ancillary operations within the Site. The primary purpose of the rock processing, concrete batching and asphalt production are to support the underground quarry-cum cavern development and the beneficial use of quarry-produced aggregates. The proposed development may also receive surplus rock arising from local construction projects for processing and recycling subject to the capacity of the proposed development. This is consistent with the established role of quarries in Hong Kong as stated in CEDD Information Note 30/2025.

No.	Comments	Responses
	3. Please advise on the estimated volume and percentage of these external aggregates to be imported and processed at the Site.	The estimated volume or percentage of imported surplus rock cannot be provided. The future receipt of surplus rock will be subject to market conditions, the programme of construction projects, the availability of suitable surplus rock, and commercial arrangements to be determined by the future contractor. Any indicative volume or percentage quoted at this stage may not be representative and could be misconstrued as an anticipated operational target or commitment for the future tenderers.
7.3	Information to supplement 4. As the majority of the Site falls within the "Green Belt" zone (about 78.2%), please provide detailed planning justifications to demonstrate that the application complies with the assessment criteria of the Town Planning Board Guidelines for 'Application for Development within Green Belt Zone under Section 16 of the Town Planning Ordinance' (TPB PG-No. 10). (Reference link: https://www.tpb.gov.hk/en/forms/Guidelines/pg10_e.pdf	Although the majority of the Site falls within an area zoned "Green Belt" ("GB"), the proposed development complies with the relevant assessment criteria set out in TPB PG-No. 10. The planning intention of the "GB" zone is primarily to promote the conservation of the natural environment, safeguard it from urban-type developments and serve as a buffer between urban areas. The proposed underground quarry-cum-cavern development is predominantly located below ground level with minimal disturbance to the existing landscapes of the surface lands. As such, the overall planning intention of the "GB" zone would not be materially undermined. With the adoption of avoidance-first design approach, the site formation footprint will be minimised as far as practicable and confined to the functional minimum necessary to facilitate the underground development. The majority of the existing natural terrain and vegetated hillside would remain in place, thereby preserving the overall character and function of the surrounding "GB" area. Furthermore, one of the planning intentions of the "GB" zone is to serve as a buffer between different land uses and urban areas. As described in Section 3.3 of the Planning Study

No.	Comments	Responses
		Report, substantial areas of unaffected "GB" land would remain between the Site and the nearest residential clusters. Together with the existing areas zoned "Other Specified Uses" ("OU") annotated "Cement Plant" ("OU(Cement Plant)") and "OU" annotated "Boatyard and Marine-Oriented Industrial Uses" ("OU(BMIU)"), these areas would continue to provide physical separation and buffering between the proposed development and nearby residential clusters. The buffering function of the "GB" zone would therefore be generally maintained. Comprehensive technical assessments undertaken in support of the application have demonstrated that, with the implementation of appropriate mitigation measures, the proposed development would not result in unacceptable ecological, landscape and visual, environmental, drainage, traffic, sewerage, waterworks or geotechnical impacts. In particular, the predominantly underground nature of the development would avoid significant encroachment into the existing natural landscape, while the proposed mitigation measures would ensure that any localised impacts associated with the required surface works are appropriately addressed.
7.4	5. The applicant should clarify whether site decontamination will be carried out when the contract expires in section 8.7 of the Preliminary Environmental Review.	Section 8.7 of the Preliminary Environmental Review refers to the potential decontamination works required before commencement of the underground quarrying. This assessment and decontamination, if required, will be carried out by the Contractor upon works commencement based on the detailed design. Regarding any decontamination works required when the underground quarry expires, this will typically be included in the engineering conditions of the land allocation. Section 6.4.3 of Planning Study Report is updated accordingly.

No.	Comments	Responses
7.5	6. As stated in section 1.5 of the Landscape Assessment, approximately 765 trees will be felled within the Site, with compensatory planting proposed both on-site and off-site. Please state clearly the proposed number of compensatory trees and the respective compensation ratios both on-site and off-site.	To mitigate landscape impacts, planting of 315 new trees is proposed, including no fewer than 75 light standard trees for off-site tree compensation, and approximately 240 seedling trees for woodland shrub mix at the Ngau Kok Wan and Tam Kon Shan Portals. Due to the site constraints (e.g. the portal slopes exceed 30 degrees in gradient), the compensation ratio is over 1:0.4. Apart from trees, shrubs and climbers mix with an approx. quantity of 567 will also be provided.
7.6	7. With reference to Table 5 (Summary of Trees Proposed to be Removed by the Proposed Works Area), it is noted that the proposed felling of 56 existing trees at the Wok Tai Wan Works Area will be subject to the Contractor's design proposal for constructing the Conveyor Belt System. The applicant is requested to clarify whether the Conveyor Belt System will be removed upon completion of the Underground Quarrying-cum-Cavern Development with Ancillary Operations, and whether reinstated planting or compensatory tree planting will be provided on-site afterwards.	The Conveyor Belt System is a temporary installation and will be removed upon completion of Underground Quarrying-cum-Cavern Development with Ancillary Operations. Due to the steep slope gradients at Wok Tai Wan Works Area, with a significant proportion falling within approximately 35° to 45°, woodland shrub mix will be compensated on-site following the demolition of the conveyor belt system.
8.	**From : Marine Department** **Contact person: Mr. KT Poon/ 2852 4453** **Date : 2 October 2026** **Ref : NA by Email**	
8.1	The submission of a revised or supplementary Marine Traffic Impact Assessment, where necessary, in the event of any changes to the approved development which may affect the findings or recommendations of the submitted Marine Traffic Impact Assessment, to the satisfaction of the Director of Marine or of the Town Planning Board.	Noted. In the event of any changes to the approved development which may affect the findings or recommendations of the Marine Traffic Impact Assessment, a revised or supplementary Marine Traffic Impact Assessment will be carried out by the Contractor upon works commencement based on the detailed design. Section 6.3.5 of the Planning Study Report is supplemented.

Agreement No. CE 79/2023 (GE)
Underground Quarrying at Tsing Yi North – Investigation, Design and Construction
S.16 Planning Application No. A/TY/154 Public Comments

No.	Commenter	Summary of Major Grounds	Responses
1	Kowloon Shipyard Company Limited (九龍船廠有限公司)	● Concerns on the traffic capacity of Tam Kon Shan Road (TKSR) ● Severe traffic congestion will hinder the upgrading of existing shipyards to support Yacht Economy and infrastructure development such as Tsing Lung Bridge	● A Traffic and Transport Impact Assessment (TTIA) has been conducted for the proposed development and no further comment is received from Transport Department (TD). ● As stated in the TTIA report, one of site accesses would be located at the unnamed access road at North West Tsing Yi Interchange (NWTYI), while another site access would be located at the off-slip of Tsing Yi North Coastal Road (West Bound) (TYNCR WB), which is **to the south of the existing roundabout at the western end of TKSR**. ● Before the commissioning of the tunnel between Tam Kon Shan Road (TKSR) portal and Ngua Kok Wan (NKW), operational traffic would use the unnamed access road at NWTYI for **both ingress and egress**. ● Upon the implementation of the tunnel between TKSR portal and NKW, operational traffic would use the off-slip of Tsing Yi North Coastal Road (West Bound) for **ingress only**. ● Therefore, the proposed access arrangement could demonstrate that operational traffic generated by the application site (the Site) **will not traverse TKSR and the adjacent roundabout at its western end**, thereby preventing further deterioration in traffic conditions on TKSR. ● During the construction phase of the tunnel to the TKSR portal (i.e. before completion of the tunnel between the TKSR portal and NKW), the corresponding construction vehicle would inevitably travel to TKSR East Bound to leave the Site from the site access at off-slip of TYNCR WB. Nevertheless, it is considered that the traffic impact induced

No.	Commenter	Summary of Major Grounds	Responses
			by the construction traffic at the concerned road and associated junction is insignificant given that the V/C ratio and RC remain almost unchanged, showing only a negligible difference compared to the reference case scenario. ● It is concluded from the TTIA report that the effect by the proposed development on the critical roads is minimal and all other study junctions and roads have sufficient capacity during both the operation and construction phases of the proposed development. The traffic impact is considered insignificant. In this regard, the proposed development is acceptable from a traffic perspective.
2	Yiu Lian Dockyards Limited (友聯船廠有限公司)	● Concerns on the traffic capacity of major trunk roads like Tsing Yi North Coastal Road and nearby interchanges	● A TTIA has been conducted for the proposed development and no further comment is received from Transport Department (TD). ● It is concluded from the TTIA report that the effect by the proposed development on the critical roads is minimal and all other study junctions and roads have sufficient capacity during both the operation and construction phases of the proposed development. The traffic impact is considered insignificant. In this regard, the proposed development is acceptable from a traffic perspective.
		● Recommends appropriate route planning for heavy vehicles and continuous communication between the future operator and other industrial operators to minimise traffic impacts.	● As stated in the TTIA report, to mitigate further deterioration of traffic conditions at Tam Kon Shan Interchange and Tsuen Tsing Interchange, the site traffic would be prohibited from traveling through Tam Kon Shan Interchange and Tsuen Tsing Interchange during AM and PM peaks (i.e. 07:00 to 09:30 and 17:00 to 19:00). ● Communication with stakeholders will be maintained during both construction and operation phases.

Agreement No. CE 79/2023 (GE)
Underground Quarrying at Tsing Yi North – Investigation, Design and Construction
S.16 Planning Application No. A/TY/154 Public Comments

No.	Commenter	Summary of Major Grounds	Responses
3	Hongkong United Dockyards Limited (香港聯合船塢集團有限公司)	● Concerns on the interface issue between Wok Tai Wan and the proposed residential development under Application No. Y/TY/2	● It is noted that the S12A Planning Application (No. Y/TY/2) is on-going and yet to be considered by the Metro Planning Committee. ● Given the uncertainty over its implementation feasibility and programme, it is considered premature to include the proposed development under Y/TY/2 as a concurrent project in this assessment.
		● The approval of this application should not affect, prejudice or predetermine the long-term planning intentions of the Site	● The underground quarrying is an interim process to create underground space and can be regarded as temporary in nature. Upon completion of the underground quarrying works, the surface land as well as the newly created cavern space for long-term gainful uses (which will be subject to a separate land use study in the future). Therefore, the proposed use will not prejudice the long-term planning intention of the Site.
4	Joint submission of: Hong Kong Cement Manufacturing Company Limited (香港水泥有限公司); Hong Kong Concrete Company Limited (港九混凝土有限公司); Quon Hing Concrete Company Limited (港興混凝土有限公司);	● Counter proposed underground quarrying and asphalt plant with suggested approval conditions.	The suggestions have been considered in relevant technical assessments which will be incorporated in the contract specifications.
		● Request to exclude 'Concrete Batching Plant' from the application due to the following reasons:	Concrete production is an essential ancillary activity, providing both financial and technical supports for the proposed development. As such, concrete production cannot be excluded from the application. Nevertheless, the actual operation programme and capacity of concrete production shall be the operational planning of the future operator to match market demands under the Government's supervision.
		➢ misclassification (i.e. using imported raw materials as a "Government Use" or "ancillary operation of	With reference to the Definition of Terms (DoT) adopted by the Town Planning Board, 'Government Use' means any place, structure or premises used directly in connection with or in support of Government administration, or the provision of Government services and facilities for use by and for the benefit of the

No.	Commenter	Summary of Major Grounds	Responses
	Quon Chun Infrastructure Management Company Limited (港晉基建管理有限公司); and Hong Kong Cement Company Limited	underground quarrying" is inappropriate);	public. It is considered that the proposed development meets the DoT with the following justifications: - • the proposed development, including the underground quarrying-cum cavern development and its ancillary operations, is directly administered and managed by CEDD, and serves to create cavern space for long-term gainful uses (which will be subject to a separate land use study in the future); • the Site will be handed over to the Government within the period specified in the contract prepared, administered and managed by CEDD; • it is expected that all rock excavated from the underground quarry will be processed through the ancillary operations within the Site; • concrete production is an essential ancillary activity, providing both financial and technical supports for the proposed development; • the proposed development can also bring environmental and public benefits by using not only the rock extracted from the proposed development but also recycling the surplus rocks excavated from other local construction sites, particularly the Government construction sites subject to the capacity of the proposed development, thereby relieving the burden of the public fill banks and landfill sites through beneficial reuse of the excavated rocks; and • on-site reuse of the recycled excavated rocks for concrete production under the proposed development can reduce the unnecessary transportation and bring environmental and carbon reduction benefits to the public.

No.	Commenter	Summary of Major Grounds	Responses
		➢ lack of supporting aggregate test data and supply-demand analysis; and	Aggregate test data: • Laboratory test indicates the rock extracted from the proposed development shall be alkali reactive. Alkali reactive rocks could be adopted for concrete production with appropriate preventive measures. There are international and local experiences to adopt reactive rock for concrete production. • The concrete production capacity specified in the Planning Study Report is the allowed capacity based on the various technical assessments. It is expected that all rock excavated from the underground quarry will be processed through the ancillary operations within the Site. Rock/Aggregates from other local construction sites may also be imported for concrete production, particularly the Government construction sites subject to the capacity of the proposed development. The actual operation capacity of concrete production shall be the commercial consideration of future contractor and governed by the permitted environmental ceiling under the contract. Supply-demand analysis: CEDD's study on the demand and supply of concrete in Hong Kong conducted in 2025 reflects that the overall demand for concrete in the coming ten years from 2025 will broadly be maintained at around 8 to 9.5 million cubic metres per annum, while the total concrete production capacity will be maintained at around 11 to 12 million cubic metres per annum. Additional concrete production capacity could provide buffer for meeting the seasonal demand and cope with the situation of temporarily shut down of CBPs in whole or partly for maintenance. While one existing CBP has already closed and some others are

No.	Commenter	Summary of Major Grounds	Responses
			expected to close over the next few years due to the land resumption for the Northern Metropolis (NM) development, the establishment of new CBPs nearby could help meet the anticipated growth in concrete demand arising from the NM development. To this end, the concrete supply for the proposed concrete production under the proposed development has been taken into account in the above supply and demand review.
		➢ insufficient impact assessments on geotechnical, marine traffic, traffic, and environmental aspects.	*Geotechnical Assessment (GA):* Based on the preliminary blasting assessment enclosed in the GA, the concerned silos, production lines, and piers on the adjoining lot do not fall within the blasting influence zone. Therefore, they are not considered as the blasting sensitive receivers. During the construction stage, the contractor will be required to submit the Contractor's Blasting Assessment Report and obtain a Blasting Permission from the Commissioner of Mines (CoM) prior to the commencement of blasting works. *Marine Traffic Impact Assessment:* A Marine Traffic Impact Assessment (MTIA) has been conducted for the proposed development and no further comment is received from Marine Department (MD). Please be clarified that under Section 5 of the Marine Traffic Impact Assessment (MTIA), the study area and model area both covered the adjacent areas for the marine traffic risk assessment. As concluded from the MTIA, it is anticipated that the proposed development, with the proposed risk control measures during the construction phase and operation phase, will not pose significant hazards to existing and future marine traffic. *Traffic and Transport Impact Assessment:*

No.	Commenter	Summary of Major Grounds	Responses
			A TTIA has been conducted for the proposed development and no further comment is received from the TD. Please also refer to the response to comments from Kowloon Shipyard Company Limited above. *Preliminary Environmental Review:* Environmental Protection Department has reviewed the Preliminary Environmental Review Report of the proposed development and no further comment is received. It demonstrates that the project is environmentally acceptable with the implementation of mitigation measures.
		● A fresh s.16 planning application is required for the proposed "Concrete Batching Plant" use at the Site.	Please refer to our response to the first comment above. As the concrete production forms an intrinsic and ancillary component of the overall project, processing it under a single and comprehensive s.16 application submission is appropriate.
		● Appeal to CEDD to release the concrete demand in 10 years; consultation with the Hong Kong Construction Material Association (HKCMA) Limited, liaison with neighbouring operators regarding drill and blasting intensity and schedule with instantaneous notification; claim for damages and compensatory mechanism.	The findings of CEDD's study have been presented to Legislative Council in May 2025 under LC Paper No. CB(1)813/2025(01). DEVB and CEDD also held two meetings with HKCMA in February and May 2025 to present the findings and seek HKCMA's views on concrete supply and demand. We will continue to keep discussion with HKCMA reflecting valuable views from industry stakeholders. In the contract for this proposed development, the operator will be required to monitor any blasting effects using methods agreed with CEDD. The operator will also make the blasting schedule publicly available. In addition, the contract will require the operator to buy insurance that covers legal

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			liability if site work accidentally causes injury, death, or damage to someone else's property.
5	Mary Mulvihill	● The location is effectively a "Gateway" to Hong Kong. Hundreds of thousands of visitors will form an impression of the territory as they come across the Tsing Ma Bridge. Any impact on the tourist experience should be carefully assessed.	● The design and layout of the proposed development have carefully considered the surrounding contexts and key public viewers. Sensitive design measures (including sensitive and aesthetically pleasing design, buffer screen planting, landscape treatments on slope or retaining structure, and compensatory planting) have been introduced to minimize adverse visual impacts arising from the proposed development. The Visual Impact Assessment reveals the proposed development would unlikely induce significant visual impact with the implementation of the mitigation measures.
		● 765 trees to be felled but a mere 75 to be reinstated upon completion of the works. This indicates a very significant negative impact.	● The Applicant supplements that out of the 765 trees proposed to be removed, more than half of them could be retained, subject to the Contractor's detailed construction proposal (i.e. at the Ngau Kok Wan Portion and Wok Tai Wan Portion), meaning the actual number of trees felled may be reduced during the construction stage. To mitigate landscape impacts, planting of 315 new trees is proposed, including no fewer than 75 light standard trees for off-site tree compensation, and approximately 240 seedling trees for woodland shrub mix at the Ngau Kok Wan and Tam Kon Shan portals. Apart from trees, shrubs and climbers mix with an approx. quantity of 567 will also be provided. ● Together with the proposed mitigation measures, the residual landscape impacts identified in the Landscape Assessment are assessed as ranging from moderate to negligible.

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		Again Pressure is being placed on Town Planning Board Members to consider that: **Creation of Revenue Source for the Government** The proposed development offers a new revenue stream for the Government, as it will be implemented under a revenue-generating contact. In alignment with the Government's latest initiative to identify new sources of income, this proposed development presents a viable opportunity to support this direction. ● This ensures that the revenue gain takes precedence over negative impacts on the community.	● All potential impacts (including traffic, geotechnical, environmental, and landscape) have been fully assessed that the project will not cause any insurmountable impacts on the community and will fully comply with all relevant statutory requirements in the Planning Application. In addition, the proposed development will generate revenue to the Government and create an underground space for future development.
		● There is no mention of how this development would interface with the Cheung Kong plans for the other side of the bridge, Y/TY/2.	● Refer to Response to Comment on Hong Kong United Dockyards Limited above.