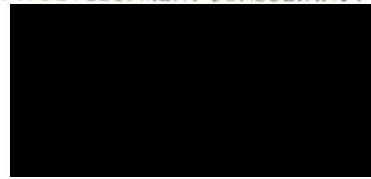




The Secretary  
Town Planning Board  
15/F, North Point Government Offices  
333 Java Road  
North Point, Hong Kong  
(Attn: Ms. Corey NG)



Your ref: TPB/A/YL-TT/751

Dear Sir/ Madam,

10 December 2025

**Section 16 Planning Application for  
Proposed Religious Institution (the Supreme Kwan Ti Temple) with Ancillary Facilities  
and Associated Excavation and Filling of Land, Lots 1475 (part), 1591 (part), 1594  
(part), 1595 (part), 1600 S.A (part), 1600 S.B (part), 1602 (part), 1622, 1624, 1629, 1630  
S.A (part), 1630 S.B, 1630 S.C, 1630 S.D, 1631, 1632, 1633, 1634, 1635 and 1636 (part)  
in D.D. 117 and adjoining Government Land, Tai Tong, Yuen Long**

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We refer to District Planning Office/ Tuen Mun and Yuen Long West 's (DPO) emails sent to us on 3.12.2025 and 4.12.2025 with the departmental comments attached and we have summarized our responses to the departmental comments in the attached **Table 1**.

We note that most of the departments, apart from the Planning Department concerning zoning and landscape details, have no major adverse comments on our planning proposal which is an improved scheme to the previous application (Application No. A/YL-TT/685) submitted in November 2024.

Our consultants have also responded to comments from Landscape Unit of Planning Department, Environmental Protection Department and Drainage Services Department respectively. Our consultants consider that the comments are not major adverse comments and could be addressed in detail in the detail design stage.

Please be advised that the present scheme has made the following improvements to the previous scheme:

- 1) A "Green Belt" ("GB") area attached to the Temple has been turned into garden use in order to reduce buildings on "GB" zone and reduce impact on "GB" zone
- 2) The building height of the Main Temple has been reduced by 2m;
- 3) The development site area has been reduced by 4%; and
- 4) Relocation of ancillary facilities underground have been proposed to reduce visual impact and to reduce the site coverage from about 30.3% to about 19.5%.

We also like to summarize the merits and importance of the development project:

- 1) The development proposal is for a major religious institution for worship of our national hero- Kwan Ti;
- 2) The development proposal will upgrade the traditional spirit of loyalty to the Chinese Nation;
- 3) The development proposal will be a leading institution unifying the operation and spirit of about 40 existing small Kwan Ti Temples in Hong Kong.

# TOCO PLANNING CONSULTANTS LTD.

PLANNING APPLICATION, DEVELOPMENT CONSULTANCY, PLANNING STUDIES

Please be advised that the Applicant is well prepared to proceed with the early implementation of the proposal. We also consider that the departmental comments have been addressed substantially and their concerns could be improved as approval conditions to facilitate the early implementation of the project. The proposed development can also contribute and have a positive impact on the economy, community, and environment of the region. In view of the merits of the development project and facilitate the early implementation, we request that the planning application could be submitted for the consideration of the Town Planning Board as soon as possible.

Yours faithfully,

Toco Planning Consultants Ltd.



Ted Chan

Managing Director



cc. *Client*

*DPO/TMYLW – Ms. Eva Tam*

Departmental Comments	Applicant's Response
Lands Department	The advisory comments from the relevant Government departments are well noted by the Applicant. After the section 16 (s.16) planning application has been approved by the Town Planning Board (TPB), the Applicant will follow up relevant Government department's necessary requirements in detail design stage.
Buildings Department	
Agriculture, Fisheries and Conservation Department	
Transport Department	
Highways Department	
Geotechnical Engineering Office of Civil Engineering and Development	
Slope Maintenance Section of Lands Department	
Food and Environmental Hygiene Department	
Urban Design Unit and Landscape Unit of Planning Department	Please see attached <b>Annex I</b> .
Water Supplies Department	<p>In response to comments from WSD, the recommendation from WSD will be considered in detail design stage subject to the approval of the captioned s.16 planning application. The proposed underground pumping and tank chamber, and the pipework from the chamber to the Development Site will not be pursued. Instead, fresh water supply pipe to the Development Site will be connected from the existing 80PE main nearest to the Site. The inside services will be designed on basis of an average flow rate of 3,500 Litres/hour by means of installing a fresh water tank which will be filled with water in advance of each festival day to cater for the water demand of anticipated 4000 visitors and 150 staff on each festival day.</p> <p>As a proposed water storage tank which will be filled in advance of each festival day (in addition to the storage tanks designed according to WSD's Technical Requirements for Plumbing Works in Buildings), the peak flow factor will be reduced from 3 to 1.2. Assuming each visitor (worshipper</p>

Departmental Comments	Applicant's Response
	<p>or non-worshipper) will stay in the Temple for one hour, the water usage factor for visitors will be 1/8 of that (FW 50L/person, flush water 50L/person) for staff working for eight hours on the festival day. It is proposed that the water usage factor for the visitors will be FW 6.25L/person and flush water 6.25L/person.</p>
Environmental Protections Department	<p>The Environmental Assessment (EA) has been prepared for the pre-submission and planning application A/YL-TT/685, and all previous comments were successfully addressed. Notwithstanding, the EA Report has been further revised. Please also refer to the response to EPD's comments for reference.</p> <p>Furthermore, the Proposed Religious Institution is not classified as a Designation Project (DP) which may have adverse impact on the environment, in accordance with Section 2 of EPD's <i>A Guide to the EIA Ordinance</i> (<a href="https://www.epd.gov.hk/eia/en/guid/ordinance/guide1-3.html#2">https://www.epd.gov.hk/eia/en/guid/ordinance/guide1-3.html#2</a>). Consistent with the pre-submission and application A/YL-TT/685, no insurmountable environmental impacts are anticipated from the Proposed Religious Institution.</p>
Drainage Services Department	<p>The Drainage Impact Assessment (DIA) was prepared for the pre-submission and planning application A/YL-TT/685, and all previous comments were successfully addressed. Nevertheless, the DIA Report will be revised in accordance with the comments provided by DSD and the guidance outlined in <i>DSD Advice Note No. 1 - Application of the Drainage Impact Assessment Process to Private Sector Projects</i>.</p> <p>Although <i>Technical Note No. 1 - Technical Note to prepare a Drainage Submission</i> primarily applies to planning applications related to temporary changes of land use (such as temporary storage areas, workshops, and small factories), this Technical Note will also be referenced in preparing the drainage layout plan for submission to the Building Authority.</p>

Departmental Comments	Applicant's Response
	No insurmountable drainage impacts are anticipated from the Proposed Religious Institution.
District Planning Office	<p>DPO have provided some comments on the proposed development, which are mainly related to the “GB” issue, alignment of the access route, and land excavation issue as stated in the TPB Guideline No. 10. The Applicant's responses to DPO comments are as follows:</p> <p><b>(a) <u>The “Green Belt” (“GB”) Issue</u></b></p> <p>Although there is a general presumption against development in a GB Zone, this does not mean that no development is possible. The question arises whether the Applicant has discharge its onus of showing “strong planning grounds” to displace the “general presumption against development” in the GB zone and for the site. The proposed development may consider “not in line with the planning intention of the GB Zone”, however, the issue arises whether the Applicant has shown sufficient “individual merits” in the proposed development to warrant a departure from the planning intention. The proposed development has unique features and characteristics and are detailed below:-</p> <ul style="list-style-type: none"> <li> <p><b>● <i>Scale of the Development</i></b></p> <p>The Applicant wishes to emphasise that the proposed Supreme Kwan Ti Temple development, which DPO defines as an ‘extensive’ development, is aimed at becoming a world’s famous religious and cultural landmarks. It will also become the headquarters building of the Kwan Ti Temple. Apart from giving tribute to the spirit of Kwan Ti but also to contribute and have a positive impact on the economy, community, and environment of the region or even Hong Kong as a whole. International class/ landmark worthy projects are generally critical to political and economic development, and very distinct from general projects. The Applicant had touch-based with the Home and Youth Affairs Bureau on this project and they did not object, also conducted several public consultations with local representative’s</p> </li> </ul>

Departmental Comments	Applicant's Response
	<p>support. The Applicant mentioned there is international competition for this project and their priority was to be located in Hong Kong. There will be a missed opportunity for Hong Kong if this project was to be considered in another country.</p> <ul style="list-style-type: none"> <li>● <b><i>Reason for Using the subject “GB” Site within the Development Area</i></b> The locality was selected after intensive site search, and the Applicant concluded that there is no other alternative location available in Hong Kong which meets <b>all the requirements</b> in addition with local support and are listed below:-</li> </ul> <ol style="list-style-type: none"> <li>1) there is an existing Kwan Ti Square in the locality;</li> <li>2) location is isolated and away from residential developments;</li> <li>3) the subject GB site is vacant unused land, thus there will be no impact on other developments;</li> <li>4) received many support from landowners and locals;</li> <li>5) site is accessible; and</li> <li>6) the Temple is to overlook towards the direction of Mainland China, therefore the Temple should be located in the northwest of Hong Kong. However, due to the Northern Metropolis Action Agenda, many areas in the New Territories North will required to be resumed for the development of New Towns. Therefore, the current place is ideal, as there is no agenda for land resumption for the current site.</li> </ol> <p>According to the Chinese temple architecture, the location of the Main Hall is to be positioned at the highest point of the site. The titles of the nearby private lots have ownership issues making them impossible for development of this scale. With the above requirement in mind, the GB land within the site is also mainly Government land thus has no land ownership complications an virgin undeveloped land, thus</p>

Departmental Comments	Applicant's Response
	<p>the site is suitable for its religious intention. The Applicant is fully aware that the proposed Main Hall is located at the “GB” zone, but such “GB” was separated and carved out from the main body of the neighbouring “GB” zone by an existing road, making it almost natural to have the site to the west of the road to be considered on merits of its own. The separation of the “GB” site area of the application site by the existing road making it natural and reasonable to propose buildings like religious Main Hall for the enjoyment of the public.</p> <p>Although the original intention of the GB area within the application site was burial ground, the Applicant received huge support by the villagers on the proposed development. With an increase in recreational activities in recent years, it is the intention of the villagers to free up the land lot from burial purposes long ago.</p> <ul style="list-style-type: none"> <li> <p><b><i>● The function of the existing Kwan Ti Square</i></b></p> <p>The Kwan Ti Square zoned “REC” was frequented by schools, organisations to hold outings, trainings at the precious open space. The Kwan Ti Square, with enhanced greeneries, is for recreational use, added with religious spirit when Kwan Ti Statue was erected in the year 2016</p> </li> <li> <p><b><i>● The Main Hall Could Not be Relocated to the “REC” Portion of the Site</i></b></p> <p>Height of the Main Hall needs to be set at the highest ground. The “GB” zone is frequented by visitors, and not “sensitive” in the course of time past. The other “REC” zone is too low in level, and also the possible development footprint is not large. The Main Hall and the associated facilities are comparable to Lantau Po Lin Monastery.</p> </li> <li> <p><b><i>● Development Footprint within the “GB” Portion to be Minimized to the Greatest Extent Possible</i></b></p> </li> </ul>

Departmental Comments	Applicant's Response
	<p>Under the current scheme, the development footprint is most reasonable. There is no merit to develop a miniature temple which will not help positioning Hong Kong on the world map of religion, in comparison to the large scale of temples such as those on the Mainland and in Taiwan. As the positioning of the Main Hall is natural and anchoring, there is the slight possibility in reducing the scattered pieces of GB site to the north and south of the Main Hall.</p> <p>(b) <b><u>Alignment of the Access Route</u></b> Please be advised that the subject access route is an existing route that has been in used for a very time period of time since before 2000. Thus, re-routing the alignment of the access route actually will further increase disturbance to the “GB” zone that already formed in time.</p> <p>(c) <b><u>TPB Guideline No. 10</u></b></p> <ul style="list-style-type: none"> <li>● <b><i>Minimisation of Land Excavation</i></b> The concern on land excavation within “GB” zone is noted. The consultant team has further studied the case and found that there is possibility to reduce excavation of the GB portion by locating some of the religious facilities to underground of the “REC” zone. In order to preserve the design intention of expressing the 3 進 3 間 with emphasis of the Main Hall, the remaining areas will be either underground or landscaped. Such improvements can be further fine-tuned in the detail design stage.</li> <li>● <b><i>Justification on Land Excavation</i></b> In order to introduce more greenery on the above ground of “GB” land, the Applicant decided to incorporate more uses underground, which also can reduce the building bulk of the temple, subsequently reducing the visual impact of the proposed development. The soil from the excavation could be used for other areas</li> </ul>



Departmental Comments	Applicant's Response
	<p>need to be filled and for the proposed greenery area. Therefore, adverse environmental impact is not anticipated from the proposed development.</p> <p><b>(d) <u>Information submitted to the Department Directly without notify the TPB</u></b> The Applicant apologies such incident happened and already reminded the consultant team must follow the relevant TPB procedure. The updated Geotechnical Planning Review Report will be submitted during detail design stage and/or the compliance of approval conditions subject to the approval of s.16 planning application.</p>
Other Departments	It is noted that Electrical and Mechanical Services Department, Hong Kong Police Force, Leisure and Cultural Services Department, and Social Welfare Department have no comments on the captioned application.

**Section 16 Planning Application for Proposed Religious Institution (the Supreme Kwan Ti Temple) and the Associated Existing Access Road, and Improvements to the Tai Tong Kwan Ti Square, At Various Lots in D.D. 117 and Adjoining Government Land, Tai Tong, Yuen Long**

**SCENIC Feedback on Issues raised**

Item	Comments	Response to Comments
<b><u>Comments from UD&amp;L, PlanD (Landscape) (Contact Person: Ms. CHAN, Tel: 3565 3949)</u></b>		
	We have below adverse comment from landscape planning perspective:	
	<p>According to the aerial photo taken in 2024, the Site was situated in area of miscellaneous rural fringe landscape and settled valley landscape characterised by temporary structures, open storage, farmland and burial ground. Woodland is mainly located on the east of the Site. Based on the site photos taken on 31.10.2025, existing tree groups were found on the eastern portion of "The Development Area" and the southern end of "The Access Road Improvement Area". As about half portion of "The Development Area" is located on area with existing tree groups and partly rested in the "Green Belt" zone, the proposed use would have adverse impact on the landscape resources. The proposed use would further degrade the landscape resource of the Site and is considered incompatible with adjacent woodland.</p>	<p>Overall, more than 63% of the existing trees within the Development Area of the site are exotic species, reflecting the current garden use of much of this area. As detailed in the tree survey, the tree covered area to the south and east of the Development Area comprises a mix of species several of which appear to be of planted origin. There are for instance 81 nos. large <i>Corymbia citriodora</i>, which is an exotic species and forms much of the higher tree canopy, as apparent in the referenced aerial photograph. These were planted by the site owner some years ago.</p> <p>Native species such as <i>Liquidambar formosana</i> (151 nos.) are also present but are confined to the edges of the Development Area, where they are closely planted for decorative effect along the existing access track. Discounting these planted <i>Liquidambar</i> there are only 30 other native trees of 10 common species (less than 6% of the existing trees) within the Development Area.</p> <p>The existing landscape resources of much of the tree covered part of the Development Area could be described as 'plantation' or 'tree garden' to reflect the planted origin and species composition present. The term woodland may only refer to localised areas of denser and more layer vegetation found at slopes at the edges of the Development Area.</p> <p>The proposed landscape scheme incorporates tree planting at a 1:1 replacement ratio, with the proposed planting of native trees around the site edges and native planting also adopted for several of the structural trees within the site. This would be combined with roof greening and vertical greening of structures as part of a mitigation strategy to blend with adjacent woodland areas. As with any development there will be a short-term impact on landscape resources, however this can be mitigated in the longer term by adopting the design principles of the approach outlined in the landscape proposal.</p>

Item	Comments	Response to Comments
	Detailed comments from landscape planning perspective are as follows:	
(a)	discrepancies of the tree numbers are found across the Planning Statement, Landscape Proposal Report (Appendix VI) and Tree Survey Reports (Appendices I and II). For clarity, only tree information within application site should be included;	Noted. Whilst some trees bordering the application site have been included for context, only the trees within the application site area have been referenced for estimation of the tree impacts and calculation of compensatory tree planting ratios.
(b)	the areas of green coverage and green roof in Plan F: Master Layout Plan (Temple Site) are not tallied with Plan O: Landscape Master Plan;	The Master Layout Plan (Plan F) is more zonal / diagrammatic than the Landscape Master plan (Plan O), which illustrates more detail on footpaths and decks within the open space and greenery areas. The green coverage calculation follows the LMP (refer to Figure 7.1 of the Landscape Proposal Report) so these variances in graphic representation would not affect the ability to meet the necessary 20% green coverage commitment for the Development Area.
(c)	Tree Survey Report for access road (Appendix II), Section 4.0 - please clarify whether <i>Tabebuia chrysantha</i> (total 21 nos.) are protected under Cap. 586;	<i>Tabebuia chrysantha</i> is an exotic species and is not specifically mentioned under Cap. 586. <i>Tabebuia</i> sps. are mentioned in Cap. 586 but this is intended to cover endangered members of this genus rather than this commonly cultivated ornamental tree.
(d)	Table 6.2 - the proposed new tree species <i>Cupressus funebris</i> and <i>Prunus mume</i> are missing; and	These species are proposed for use by the project architect and could readily be added to the proposed species list at Table 6.2. at the next submission stage.
(e)	Landscape Proposal Report (Appendix VI), para 8.3 - only one <i>Aquilaria sinensis</i> is identified within the site area, the applicant should clarify the discrepancies between the Tree Survey Reports (Appendices I and II) and this paragraph.	There is 1 no. <i>Aquilaria sinensis</i> within the Development Area of the site (Appendix II). The <i>Aquilaria sinensis</i> surveyed in the vicinity of the access road (Appendix II) is outside the Application Site boundary and so would not affect the veracity of the statement at para. 8.3.

**End of Draft Feedback on issues raised.**