



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

Attn.: Mr. Leung (Tel: 2231 4828)

Dear Sir/ Madam,

26 September 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, 1636 (part) in
D.D. 117 and Adjoining Government Land, Tai Tong, Yuen Long**

We refer to the captioned planning application submitted on 7.8.2025 and our clarification letter dated 16.9.2025 in response to your request for additional information on excavation and filling area of the scheme.

The approximate figures provided in our letter dated 16.9.2025 remains the same (i.e. approximate 9,806m² of soil excavation and 6,038m² of backfill respectively). As requested, an indicative plan showing the breakdown of the proposed soil excavation and backfill area within the "Green Belt" and "Recreation" zones are attached for your attention.

Please also note that an estimated excavation figure is present in the Environmental Assessment (EA) (i.e. Appendix IX of the Planning Statement) to assess the air quality impact during construction phase. For a more conservative approach, the EA has been updated to assume that about 60% of the site area (i.e. approximate 10,018m²) might be required for excavation works. Relevant amended pages of the EA are also attached for your information. With the minor updating of the figures, the conclusion remains the same that the proposed development would not cause adverse air quality impact during the construction phase.

We hope that the above responses have adequately addressed the concerns of the District Planning Office/ Tuen Mun and Yuen Long West. Further responses can be made after the planning application has been circulated and comments from relevant Government departments are received.

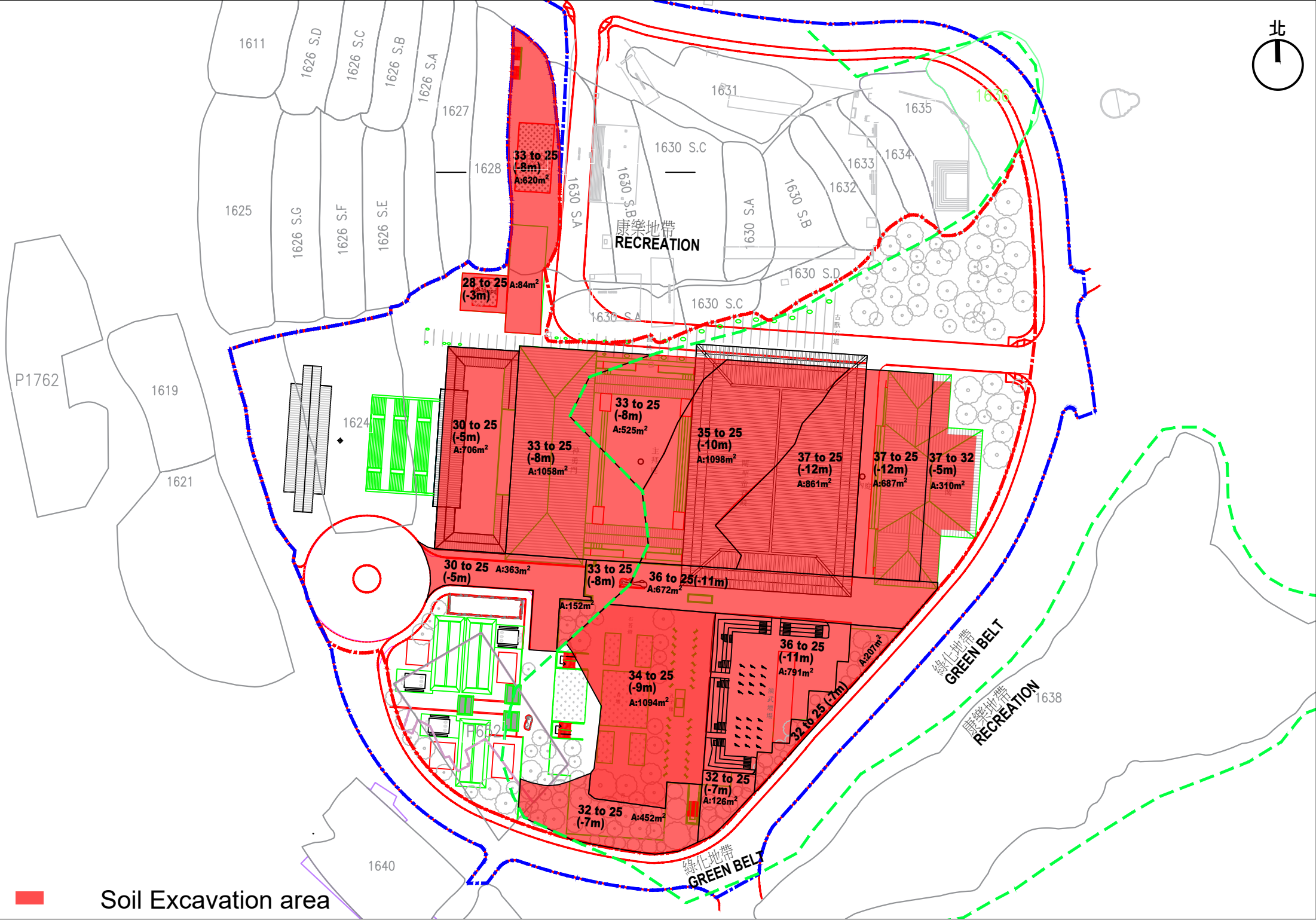
Yours faithfully,

Toco Planning Consultants Ltd.

Ted Chan
Managing Director



cc. Client



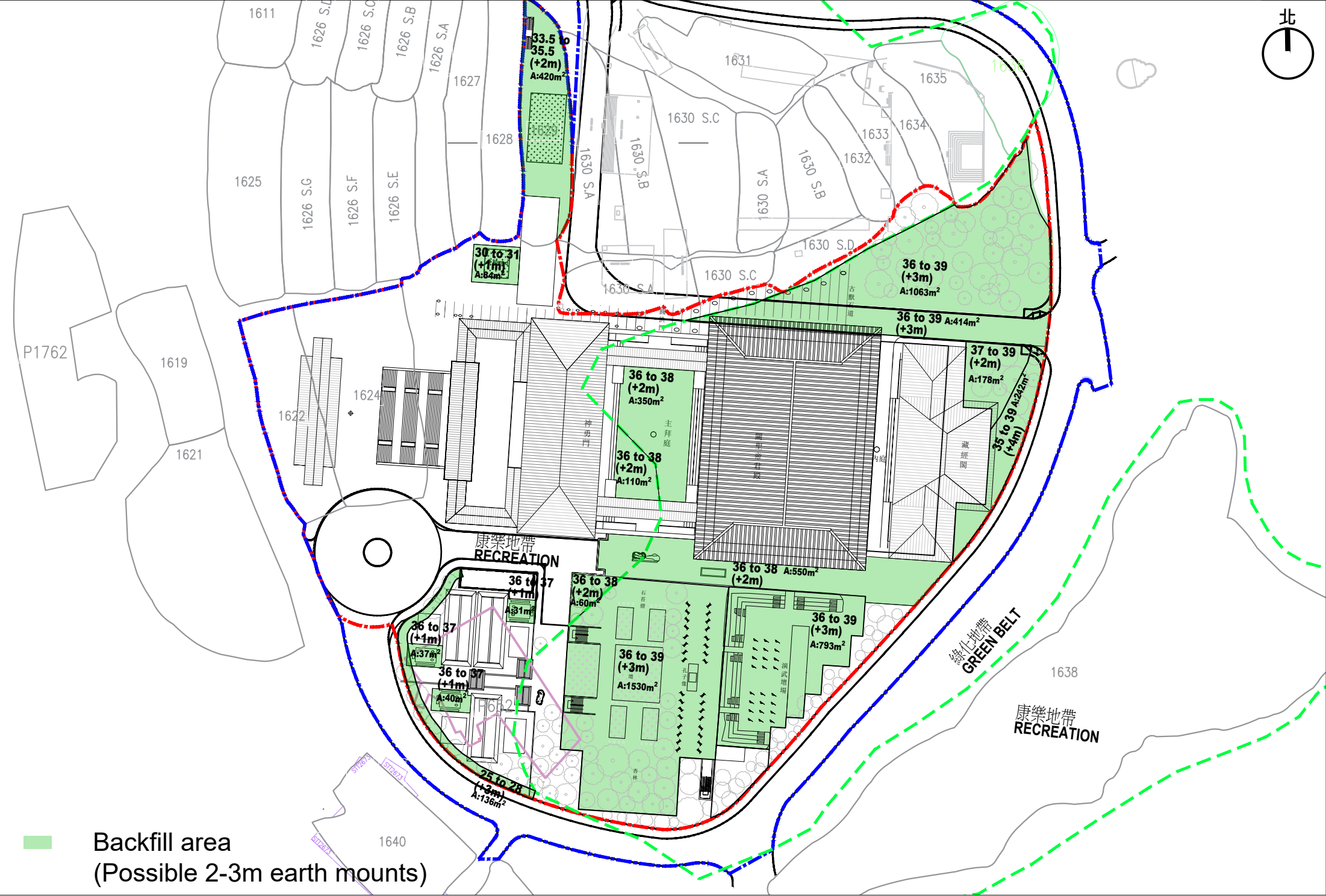
APPROXIMATE SOIL EXCAVATION AREA:

(620 + 84 + 706 + 1058 + 525 + 1098 + 861 + 687 + 310 + 363 + 152
+ 672 + 1094 + 791 + 207 + 126 + 452) m²

= 2983 m² (REC) + 6823m² (GB)
= 9806 m²

For Indicative Pupose Only

Detailed calculations subject to detail design stage



APPROXIMATE FILL AREA:

(420 + 84 + 1063 + 350 + 110 + 414 + 178 + 242 + 550 + 60 + 1530 + 793+ 136 + 31 + 37 + 40)m²

= 918 m² (REC) + 5120 m² (GB)
= 6038 m²

For Indicative Pupose Only

Detailed calculations subject to detail design stage

2.4 Air Quality Impact During Construction Phase

- 2.4.1 Particulate Matters (“PM”) and gaseous emission are the major impact sources that will be generated during construction activities, such as excavation, stockpiling, earth moving, transferring or handling of dusty materials, and use of construction vehicles and powered mechanical equipment (“PME”).
- 2.4.2 Based on the current scheme, excavation works might be required on about 60% of the Site area, i.e. 10,018m², and approx. 30,055m³ of excavated materials will be generated from excavation works as mentioned in Paragraph 5.3.5. Assuming a construction period of 2 years with 6 work days a week, approx. 52m³ of excavated materials (i.e. 30,055m³ / (6 x 4 x 24 days)) will be generated every day on average. The capacity of an average dump truck is 7m³ [Ref.#2]. Hence, about 8 dump trucks will come to the site every day. Therefore, air quality impact from dump trucks is not expected to be significant. There will be limited numbers of diesel-powered machinery to be used at the site, estimated to be one excavator-mounted breaker and two excavators which would be further reviewed subject to site condition and detailed construction methods.
- 2.4.3 Based on the available information from public domain and a site visit conducted on 13 March 2025, no concurrent project within 500m of the assessment area is observed. Nonetheless, there may be concurrent projects in the future. Concurrent projects in the future, if any, will be further reviewed when the construction programme is available, and the cumulative construction air quality impact, if any, will be further assessed. The *Air Pollution Control (Construction Dust) Regulation*, *Air Pollution Control (Non-road Mobile Machinery) (emission) Regulation* and *Air Pollution Control (Fuel Restriction) Regulation* stipulated several air quality control measures. With these good practices, PM and gaseous emissions arising from construction activities and operation of on-site diesel-powered mechanical equipment can be minimized, and therefore construction air quality impact is not expected.

Mitigation Measures

- 2.4.4 The following good practices and control measures shall be implemented during the construction phase to control adverse air quality impact on the surrounding air sensitive uses:
- Hard paving surface on open area, regular spraying water on exposed site surfaces and unpaved roads to reduce dust emissions, particularly during dry weather.
 - Before, during and immediately after any excavation or earth moving operation, the working site shall be sprayed with water to keep the surface wet.
 - Spraying water frequently for extra dusty areas and areas close to ASRs.
 - Any stockpile of dusty materials shall be either covered entirely by impervious sheeting, placed in an area sheltered on the top and three sides, or sprayed with water so as to maintain the entire surface wet.
 - Before loading, unloading or transfer any dusty materials, wet the dusty materials as far as practicable.

² Construction of Annex Block at Hong Kong Observatory Headquarters, Tsim Sha Tsui, 2023 (No. 303/2023)

- Inert Construction and Demolition (“C&D”) materials (e.g. waste concrete, surplus soil, waste asphalt etc.)
- Non-inert C&D Materials (e.g. wood and plastics)
- Chemical wastes such as waste battery and waste lubricating oil from vehicles/plant maintenance
- General refuse generated by site workers

Inert C&D Materials

- 5.3.2 Inert C&D materials are those which do not decompose, such as debris, rubble, earth and concrete, and which are suitable for land reclamation and site formation.
- 5.3.3 There are two major phases during construction stage, site formation and building works. Each major phase will include sub-Phases. The tentative sequences will include site clearance, excavation and construction of the new buildings. The major source on inert C&D materials during construction will be site clearance, excavation or re-profile works, superstructure and construction of the new buildings for the Proposed Development.

Inert C&D Materials from Site Formation

- 5.3.4 Inert C&D materials may be generated during site formation stage, including site clearance, excavation or re-profile works. The Site area is approximately 16,697m² and about 30% of the site is paved, i.e. 5,009m². Assuming the thickness of paving is 0.2m, approx. 1,002m³ (i.e. 5,009m² x 0.2m) inert C&D materials will be generated from the removal of paving.
- 5.3.5 The current elevation of the Site ranges from 23.8mPD to 39.1mPD. According to the Indicative Layout and Section Plans of the Proposed Development, excavation works shall be required for part of the Site. For a conservative estimation, it is assumed to excavate an average depth of 3m across 60% of the Site area, i.e. 10,018m². Hence, approx. 30,055m³ of excavated materials will be generated from excavation works.

Inert C&D Materials from Superstructure

- 5.3.6 Construction waste will also be generated during construction of the Proposed Development. This will comprise inert C&D materials, such as concrete waste, waste from blockwork and brickwork; and non-inert C&D materials (or C&D waste) from timber formwork, packaging waste and other non-inert wastes.
- 5.3.7 In accordance with Section 3.2 of A Guide for Managing and Minimizing Building and Demolition Waste published by the Hong Kong Polytechnic University in May 2001 (“the Guide”), it provides a “waste index” for building waste generation in Hong Kong based on the Gross Floor Area (“GFA”) of three different building types as follows:
- Private Housing Projects 0.250m³/m² GFA
 - Government Housing Projects 0.174m³/m² GFA
 - Commercial Office Projects 0.200m³/m² GFA
- 5.3.8 To provide a conservative estimate of building waste from the Proposed Development, the “waste index” for private housing project are adopted. However, as noted above, in addition to inert C&D materials, this “waste index” also include non-inert C&D materials (or

C&D wastes), such as timber formwork, packaging waste and other wastes, and the Guide does not identify what proportion of building waste is inert C&D materials and what proportion is non-inert C&D materials (or C&D waste).

- 5.3.9 With reference to Plate 2.12 of EPD's *Monitoring of Solid Waste in Hong Kong – Waste Statistics for 2023*, 90% of construction waste was either reused on-site or sent to the public fill reception facilities, implying that such construction wastes should be inert C&D materials. The proportion of inert C&D materials in the “waste index” can therefore be estimated by applying the Hong Kong-wide proportion of inert C&D materials in construction waste, i.e. 90%, to the “waste index” as follows:

$$\begin{aligned}\text{Waste Index}_{\text{Inert C\&D materials (Commercial Office Projects)}} &= 0.90 \times 0.250\text{m}^3/\text{m}^2 \text{ GFA} \\ &= 0.225\text{m}^3/\text{m}^2 \text{ GFA}\end{aligned}$$

- 5.3.10 The proportion of inert C&D materials of building waste from the Proposed Development with a GFA of about 21,864m², can therefore be estimated as follows:

$$\begin{aligned}\text{Building Waste} &= \text{Waste Index}_{\text{Inert C\&D materials (Commercial Office Projects)}} \times \text{GFA} \\ &= 0.225 \times 21,864 \\ &= 4,919\text{m}^3\end{aligned}$$

- 5.3.11 Hence, approx. 4,919m³ of building wastes would be generated during construction of the Proposed Development.

- 5.3.12 **Table 5-1** summarises the total estimated inert C&D materials generated during construction stage.

Table 5-1 Total Estimated Inert C&D Materials Generated During Construction

INERT C&D MATERIAL TYPE	ESTIMATED INERT C&D MATERIAL GENERATION (m ³)
STAGE: SITE FORMATION	
Removal of Paving	1,002m ³
Excavation works	30,055m ³
STAGE: CONSTRUCTION OF SUPERSTRUCTURE	
Building Waste	4,919m ³
Total	35,975m³

- 5.3.13 In total, approx. 35,976m³ of inert C&D materials may be generated throughout the construction period. Assuming the construction period to be two years with six working days a week and four weeks a month, the daily inert C&D material generation rate will be approx. 62m³/day (i.e. 35,976m³ / (6 x 4 x 24) days).
- 5.3.14 Inert C&D materials should be reused on-site as far as practicable. Good site practice and mitigation measures should be implemented, as recommended below. Surplus inert C&D materials, if any, should be reused or recycled off-site as far as practicable. If there will still be any remaining materials, they should be delivered to public fill reception facilities, Fill Bank at Tuen Mun Area 38 and Fill Bank at Tseung Kwan O Area 137.

- 5.3.15 Most of the inert C&D materials generated from construction will be excavated materials. Since backfilling of excavated materials is not needed for construction, not much of the inert C&D materials will be re-used on site. Therefore, the 62m³/day inert C&D material will be delivered to public fill reception facilities. Nonetheless, the reuse of inert C&D materials will be further explored in the later project stage. The reuse of inert C&D materials in public fill reception facilities would be agreed with relevant authorities before delivery.
- 5.3.16 With the provision and implementation of the recommended mitigation measures, no adverse waste impact from the handling, transportation or disposal of inert C&D materials during construction of the Proposed Development is anticipated.

Non-Inert C&D Materials

- 5.3.17 Non-inert C&D materials (or C&D waste), are those which can decompose such as bamboo, timber, vegetation, packaging waste and other organic material, and which are therefore unsuitable for land reclamation.
- 5.3.18 The major source of non-inert C&D materials during construction stage will be removal of topsoil and vegetation, and tree felling works during site formation and the non-inert C&D material component of building waste such as timber formwork and packaging waste.
- 5.3.19 Topsoil is the uppermost layer of soil capable of growing and supporting vegetation. The Site area is approximately 16,697m² and about 70% of the site is unpaved, i.e. 11,688m². Assuming the average depth of the topsoil is 0.25m, approx. 2,922m³ (i.e. 11,688m² x 0.25m) topsoil will be generated during site formation works.
- 5.3.20 The building waste in the “waste index” provided in the Guide also includes inert C&D materials. Since Plate 2.12 of Waste Statistics for 2023 shows that in 2023, 9% of C&D waste was disposed of at landfills. The proportion of non-inert C&D materials (or C&D waste) in the “waste index” can be estimated by applying the Hong Kong-wide proportion of non-inert C&D materials (or C&D waste) in construction waste, i.e. 9%, to the “waste index” as follows:

$$\begin{aligned}\text{Waste Index}_{\text{Inert C\&D materials (Commercial Office Projects)}} &= 0.09 \times 0.200\text{m}^3/\text{m}^2 \text{ GFA} \\ &= 0.018\text{m}^3/\text{m}^2 \text{ GFA}\end{aligned}$$

- 5.3.21 Given the total GFA of the Proposed Development is approx. 21,864m², the non-inert C&D materials (or C&D waste) components in building waste can therefore be estimated as follows:

$$\begin{aligned}\text{Building Waste} &= \text{Waste Index}_{\text{Non-Inert C\&D materials (Commercial Office Projects)}} \times \text{GFA} \\ &= 0.018 \times 21,864 \\ &= 394\text{m}^3\end{aligned}$$

- 5.3.22 Hence, approx. 394m³ of building waste would be generated during construction of the Proposed Development.

Table 5-3 *Estimation of Wastes to be Generated During Construction Phase*

WASTE TYPE	ESTIMATED QUANTITY	SOURCES OF WASTE	TREATMENT
INERT C&D MATERIAL			
Paving	1,009m ³	Site clearance	On-site reuse/recycle
Excavated materials	30,055m ³	Excavation and site formation works	Off-site reuse/recycle Delivered to public fill reception facilities
Building waste	4,919m ³	Superstructure construction	
NON-INERT C&D MATERIAL			
Topsoil	2,922m ³	Site clearance and formation	On-site sorting for reuse/recycle
Building Waste	394m ³	Superstructure construction	Disposal of at landfill
OTHERS			
General Refuse	26 tonnes	Construction staff	On-site sorting for reuse/recycle Disposal of at landfill
Chemical Waste	<1 tonnes	Waste batteries, lubricating oil and waste paints, etc.	All to be collected by the licensed chemical waste collector and treated in the CWTC.

Mitigation Measures

- 5.3.38 Waste management shall be controlled through contractual requirements as well as through statutory requirements.
- 5.3.39 A Waste Management Plan (“WMP”) should be developed by the contractor and submitted to the Project Engineer/Architect for approval in accordance with ADV-19 before the commencement of any construction works. The objectives of the WMP will be to identify any potential environmental impacts from the generation of waste at the Site; to recommend appropriate waste handling, collection, sorting, disposal and recycling measures in accordance with requirements of the current regulations; and to categorise and permit segregation of C&D materials where practicable (i.e. inert material/non-inert material) for disposal considerations i.e. public fill reception facilities/landfill.
- 5.3.40 The contractors should adopt good housekeeping practices with reference to the WMP such as waste segregation prior to disposal. Besides the provision of stockpiling and segregating areas at site, effective collection of site wastes is required to prevent waste materials being blown around by wind, flushed or leached into nearby waters, or creating odour nuisance pest and vermin problems. Waste storage areas should be well maintained and cleaned regularly.
- 5.3.41 A trip-ticket system should be established in accordance with DevB TC(W) No. 6/2010 and the *Waste Disposal (Charges for Disposal of Construction Waste) Regulation* to monitor the disposal of public fill and solid wastes at public fill reception facilities and landfills, and to control fly-tipping. A trip-ticket system should be included as one of the contractual requirements for the contractor to strictly implement. Dump trucks with mechanical cover shall be used to minimise windblown litter and dust during transportation of waste.