



長春社 Since 1968

The Conservancy Association

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16th July 2021

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

By e-mail: tpbpd@pland.gov.hk

Dear Sir/Madam,

RE: Comments on the Section 16 Application No. A/SK-PL/1

The Conservancy Association (CA) OBJECTS to the captioned application.

1. Not in line with the planning intention of Agriculture (AGR) zone

According to The Approved Pak Lap Outline Zoning Plan (OZP) No. S/SK-PL/3, the planning intention of AGR zone “*is intended primarily to retain and safeguard good quality agricultural land/farm/fish ponds for agricultural purposes. It is also intended to retain fallow arable land with good potential for cultivation and other agricultural purposes*”. However, all the proposed uses are largely not for cultivation or farming-associated ancillary use. We do not think such plan is in line with the planning intention.

2. Adverse visual and landscape impact

According to The Approved Pak Lap OZP No. S/SK-PL/3, the general planning intention for the Area is “*to protect its high natural landscape value, to protect its natural and rural character which complements the overall naturalness and the landscape beauty of the surrounding Sai Kung East Country Park...*”. However, the proposed structures, such as “Hakka Tulou” and “Wind and Rain Bridge”, are totally not compatible with the surrounding Country Park and Pak Lap Village. Not only does the design but also the height (4 storeys) of the proposed structures would greatly reduce the original visual openness in the subject site. Besides, the proposed



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sewage treatment plant (STP) has apparently not been featured or assessed in the Visual Impact Assessment (VIA). As such, we do not agree with the conclusion of VIA that overall visual impact is considered “Negligible”.

From Section 14.3.6 and 14.3.7 of Landscape Impact Assessment, no loss of semi-natural/channelized watercourse and marsh would be resulted. However, 0.02ha of additional channel areas and 0.09ha of new naturally flooded seasonal wetland area would be created as mitigation measures. We opine that the proposed measures are irrelevant to mitigate any potential losses in this project.

3. Adverse environmental impact

The project proponent claimed that the proposed Nature Education Park will accommodate a total of approximate 300 students and staff. Ancillary student accommodation for not more than 160 students will be provided within 40 rooms. Together with tent camping activities and some other proposed outdoor activities mentioned in the Planning Statement, we highly worry that the scale of development is too large and would definitely worsen environmental condition of Pak Lap.

Section 4.4.3 of the Environmental Assessment admitted that pesticides or fertilizers may be used in the maintenance of the grass area/camping area and runoff may potentially be contaminated by agrochemicals. Apart from this, we believe that all potential source of water pollution (either from visitors or operators) during daily operation of the Nature Education Park have not been fully identified. The project proponent also failed to identify most of the potential environmental impacts during construction phase. Apart from structures mentioned above, some other ancillary utilities, such as STP and its associated sections, stormwater channel, freshwater supply main, and so on, might require land excavation. All polluted water arise from the above activities and works would end up in entering adjacent watercourses, and then the famous Pak Lap Wan where most of the outdoor and water activities are currently concentrated in.

Regarding the proposed STP, we wish to add that all relevant details, such as exact capacity, detailed process design calculations, are still unknown. It remains doubtful how the generated sewage flows in such large scale can be properly treated. Besides,



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the treated sewage would be discharged at the stormwater channel within the subject site, according to Figure 2 of Appendix C. We worry that such arrangement would only increase flood risk in the subject site.

Regarding waste management, we would expect that the proposed 4 structures in the subject site would generate considerable amount of construction and demolition (C&D) waste, but the Environment Assessment failed to identify this potential impact. We also cannot see how C&D waste generated during construction phase would be properly treated, and transported from Pak Lap to suitable waste treatment facilities.

4. Undesirable precedent of “destroy first, build later”

This site once comprised seasonally wet grassland and freshwater marsh, with small colony of Water Fern (*Ceratopteris thalictroides*) recorded. *Ceratopteris thalictroides* is listed in “Rare and Precious Plants of Hong Kong”, vulnerable in China and under State protection (category II) in China. Unfortunately, the site has been subject to land formation including land filling and vegetation clearance since 2009 (Figure 1-6). Enforcement Notice (E/SK-PL/0003) has been issued on 7 June 2021.

From our previous observation in late-February 2021, the site was re-grassed and no longer seasonally wet. A few tent-like and stage-like structures were put on the southern periphery of the AGR zone. Some construction materials seemed to be remained in the site as well (Figure 7-10). It was suspected that this was a case of “destroy first, build later”.

Planning Department and members of Town Planning Board (TPB) should alert that TPB has announced approaches to deter “destroy first, build later” activities in 2011. It stated that “*the Board is determined to conserve the rural and natural environment and will not tolerate any deliberate action to destroy the rural and natural environment in the hope that the Board would give sympathetic consideration to subsequent development on the site concerned*”¹. Therefore, this application should

¹ TPB Press Release. Available at:

<http://www.info.gov.hk/gia/general/201107/04/P201107040255.htm>



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not be given any sympathetic consideration or it will set an undesirable precedent
for similar cases in future.

Yours faithfully,

Ng Hei Man

Campaign Manager

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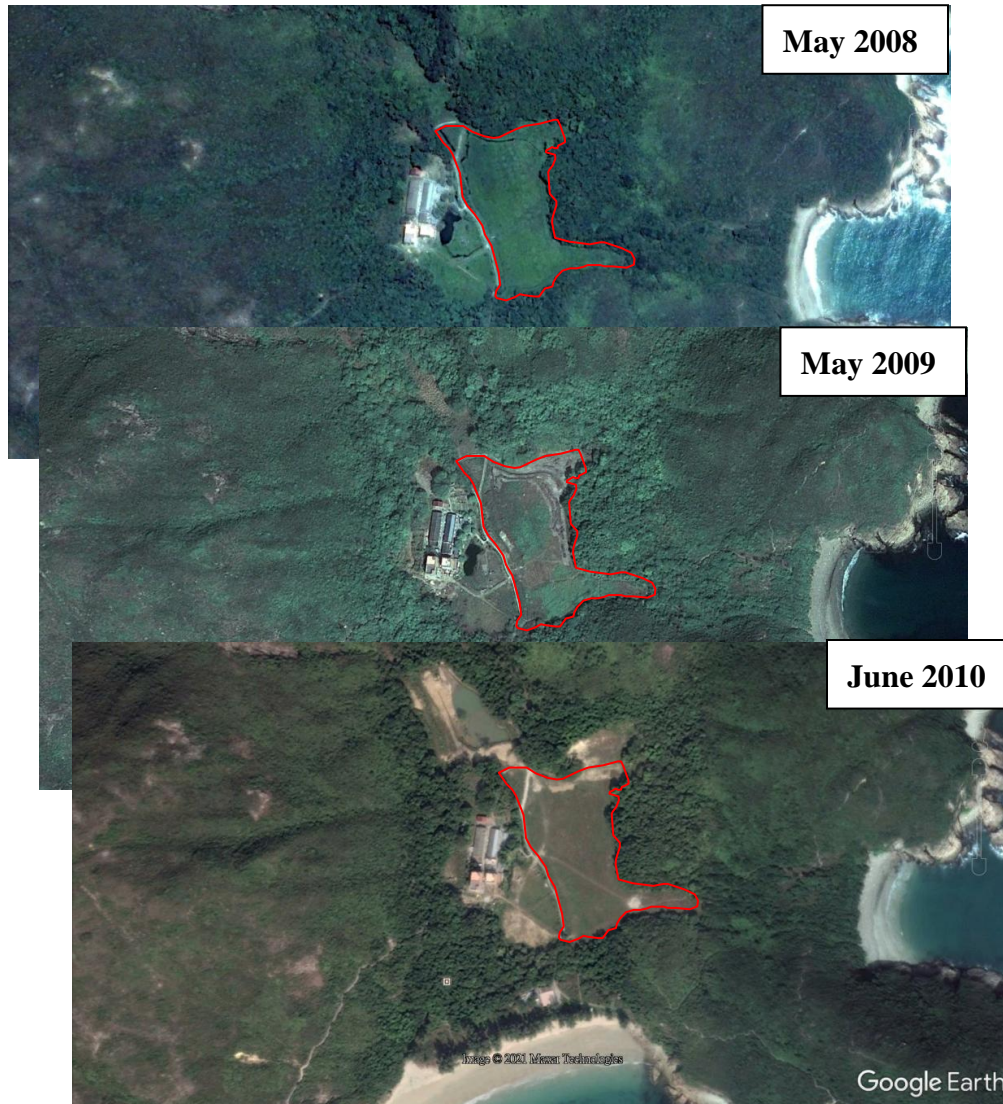
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Figure 1-6 According to aerial photos, the site (marked in red) was subject to land formation and vegetation clearance in the past (Source: Google Earth)





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October 2014



November 2019



February 2021

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Google Earth



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Figure 7-10 Site condition observed in mid-February 2021

