



長春社 Since1968

The Conservancy Association

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17th November 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

In spite of the further information provided by the applicant, we consider our comments and concerns stated in the previous submission dated 16th July 2021 are still valid. The Conservancy Association (CA) would remain our objection to the captioned Section 16 application. Please refer to our previous objection (Appendix).

We wish to add the following points:

1. Regarding the development scale, it is noted that the scale of Block 2 is reduced with Site Coverage reduced from 12.9% to 12.4%, Plot Ratio reduced from 0.31 to 0.30 and GFA reduced from 4,305m² to 4,161m². However, we opine that such reduction of development scale is very minor. Adverse or even irreversible environmental impacts would still be resulted by this proposed development.
2. Regarding the Ecological Impact Assessment (EcoIA), if we refer to the Monthly Weather Summary by Hong Kong Observatory, the total rainfall in April and May 2021 were 32.5mm and 65.0mm, about 21 and 22 percent of the normal figure (i.e. 153.0mm and 290.6mm) respectively. The survey in April and May 2021, although conducted in wet season, might still not be adequate in reflecting the ecological condition, and its associated impact evaluation might under-estimate potential ecological impacts.
3. We note that a Wetland Restoration Proposal is also attached in the EcoIA. However, the proposed size of the Wetland Restoration Area (WRA) is 2,020m²,



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less than 15% of the entire site which was once seasonally wet grassland and freshwater marsh. Worse still, Section 6.2.2 of the Wetland Restoration Proposal mentions that “*with due consideration that Block 2 of the proposed development in on top of the WRA, the construction works for WRA will commence after Block 2 is build*”. It is doubtful if the arrangement to put the WRA at the bottom of Block 2 would imply further reduction of the size of WRA. We also highly worry that potential environmental disturbance generated by Block 2 during operation phase would cause adverse impacts on WRA.

4. Section 5.3.1 states that “*Rainfall during the wet season will be the only regular source of water for the WRP... Since the annual rainfall is significantly higher than annual evaporation, seasonal reductions in water levels could be tolerated as the wetland would be replenished during each wet season*”. Such assumption would be too-optimistic, viewing the total amount of rainfall during wet season in 2021 can also be very low. Simply speaking, we do not think the hydrological management is taking account of the worst-case scenario.

Yours faithfully,

Ng Hei Man

Campaign Manager

The Conservancy Association