



長春社 Since 1968

The Conservancy Association

會址: 香港新界葵涌貨櫃碼頭路 77-81 號 Magnet Place 一期十三樓 1305-6 室 電話 Tel.:(852)2728 6781 傳真 Fax.:(852)2728 5538
Add.: Units 1305-6, 13/F, Tower 1, Magnet Place, 77-81 Container Port Road, Kwai Chung, New Territories, H.K. 電子郵件 E-mail:cahk@cahk.org.hk
網址 Website:www.cahk.org.hk

6th July 2021

Ms. Cheng Mei Sze, Maisie, JP
Director of Environmental Protection
Environmental Protection Department
Environmental Impact Assessment Ordinance Register Office

By E-mail: eiaocomment@epd.gov.hk

Dear Ms. Cheng,

RE: Comments on Proposed Residential Development at Lot No. 2 in D.D.228 near Pak Fa Lam Road, Sai Kung Project Profile

The Conservancy Association (CA) would like to express our grave concern on the captioned.

1. Justification of the project

The proposed residential development is within/close to Ma On Shan Country Park, Ho Chung Valley SSSI, Lower Indirect Water Gathering Ground, Ho Chung Trackway, Wilson Trail. Habitats such as natural streams, dense woodland, etc., can be spotted within the study area of the development. Proposed road improvement work in Pak Fa Lam road also fall within Country Park and “Conservation Area” zone. With so many environmentally sensitive areas within the site, we do not understand the reason for proposing such residential development and associated road improvement work here.

Unless good justification can be provided that this project is of urgent need and highly related to public interest, we DO NOT think that such project should be proposed and go for further detailed design in this stage.

2. Scale of the project

Figure 1.1 seemed to tell us that the application site is now only confined to the residential development site but not Pak Fa Lam Road, despite provision of indicative layout of proposed road improvement works at Pak Fa Lam Road. Meanwhile, Section 1.2.2 mentioned that “*To support the proposed residential development, road*



improvement works on the existing Pak Fa Lam Road and the other associated site formation and infrastructures works (e.g. drainage, sewerage, water supply, utilities for power, cable, gas, etc.) may be require and they would form part and partial of the Project if they are confirmed to be required". Viewing the scale of the proposed residential development, we opine that all associated infrastructures works would be necessary, and we highly worry that excluding assessment on all the above infrastructure works would under-estimate potential environmental impacts brought by the project.

3. Impact on cultural heritage

For Ho Chung Trackway (Figure 1), Antiquities and Monuments Office (AMO) once conducted Study on Old Trails in Hong Kong in 2014. The report¹ has the following conclusion on Ho Chung Trackway:

"The first half of the Trackway (section between Pak Fa Lam Road and Tai Lam Wu Road) is generally in good condition..."

"Generally speaking, among the 14 old footpaths recorded by the AMO, boulders found in Ho Chung Trackway, Hok Tau Reservoir-Cheung Uk Boulder Trackway, Sun Leung Tam Trackway and Yi O-Fan Lau Boulder Trackway are in better condition"

"A thorough assessment of each footpath's values and significance finds that the Ho Chung Trackway and Sun Leung Tam Trackway have attained the highest level of significance and are thus regarded as more significant than the rest of the footpaths in Hong Kong"

Section 3.8.2 of the Project Profile stated that *"As a very small section of the Trackway run across between the Application Site and Pak Fa Lam Road, it could be directly affected during the construction works"*. From our preliminary observation, the proposed road widening work and (at least) one layby would be very close to the Ho Chung Trackway (Figure 2) and cause direct loss on its section.

¹ Please refer to Section 3.2 and Conclusion of Study on Old Trails in Hong Kong Final Report https://www.amo.gov.hk/form/executive_summary_140521_e.pdf



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網址 Website:www.cahk.org.hk

Besides, a western style house can also be identified next to Ho Chung Trackway. The report has the following description:

“It is a free standing house similar to a villa with three-storeys and enclosed by a boundary wall. Western architecture features can be identified from the arched doorway of rusticated stone with a carved modified ‘fleur de lis’ on the keystone, arched leadlight window with an art nouveau style design and supported by classical pilasters with modified composite capitals, curved internal staircase, modified early renaissance window with a wide span round arches in the floral leadlight glass sections, a sinuous mosaic floral design on the rise of the step to balcony etc. This building demonstrates a complete departure from Chinese architecture. The designer or owner of the building obviously admired art nouveau design leadlight windows and arches”

It was currently a non-graded historic building, but viewing its architectural characteristics, we are concerned whether such characteristics would be adversely affected during construction phase of the project. Unfortunately, the Project Profile did not include this item in the assessment.

While we have already mentioned that it would not be appropriate for the project to be proposed in this stage, the below concerns should be considered for the part of cultural heritage:

- i. Direct and indirect impacts on all heritage items, including Ho Chung Trackway, the western style house next to Ho Chung Trackway, should be identified.
- ii. Alternatives should be further explored to avoid/minimize direct loss on all heritage items in both construction and operation phase.

Yours sincerely,

Ng Hei Man

Campaign Manager

The Conservancy Association

Figure 1 The alignment of Ho Chung Trackway is very close to the development site (marked in red) and road improvement work (marked in yellow)

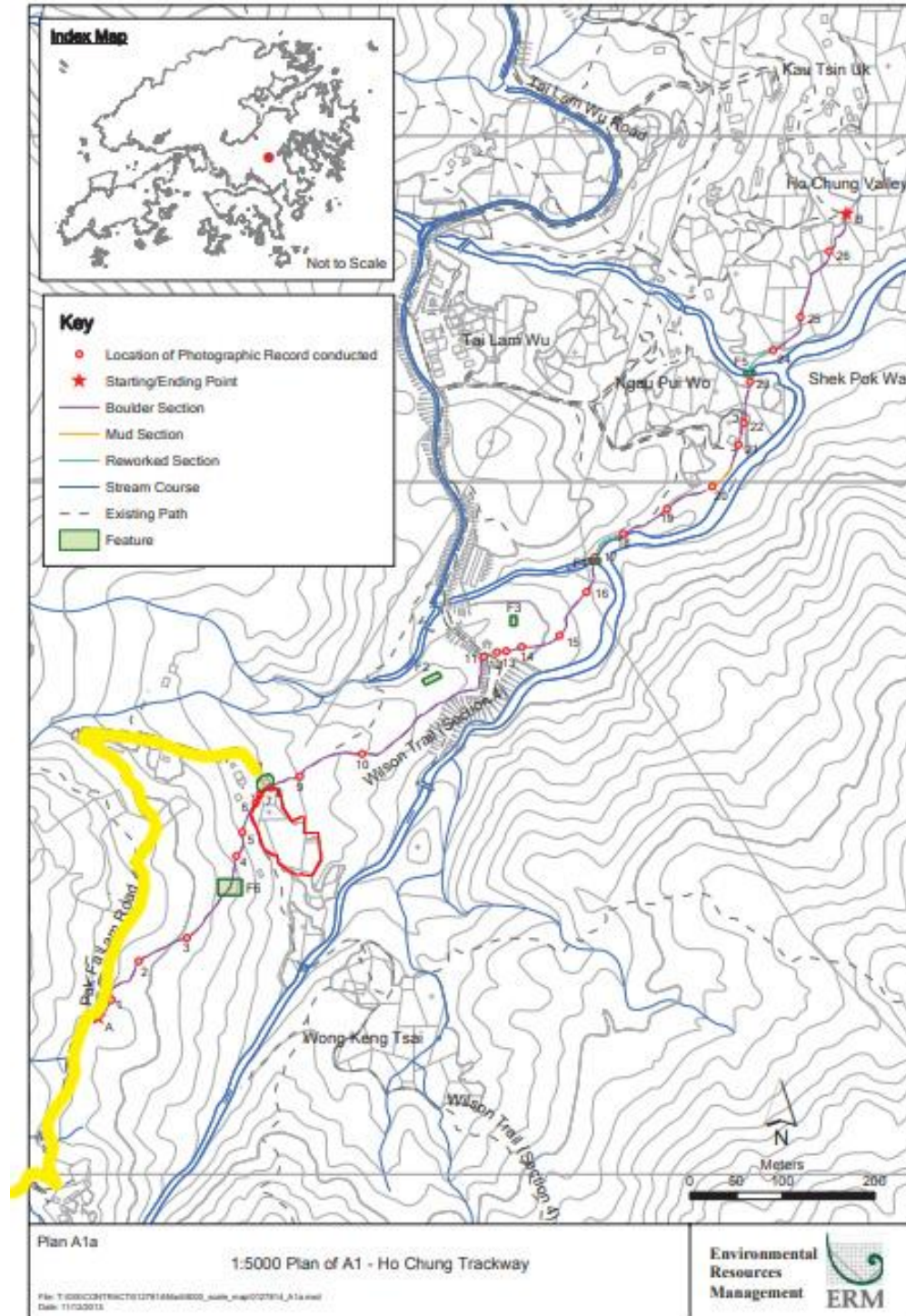


Figure 2 Referring to Figure 1.3 of the Project Profile, the proposed road widening work and (at least) one layby (circled in red) would be very close to Ho Chung Trackway (marked in purple)

