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The Conservancy Association

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16th December 2011

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/DPA/NE-TKP/12

The Conservancy Association (CA) OBJECTS to the captioned application. This application is similar to the previous one A/DPA/NE-TKP/4 which is a significant development rather than small scale, individual small house construction, and would adversely affect the natural environment of the area. We reiterate that the general planning intention of this area should complement Sai Kung East and Sai Kung West Country Park with reference to high ecological and landscape value of To Kwa Peng.

CA worries that the small house works would be launched very close to a natural stream which directly flows into the estuarine mudflat along the coast of To Kwa Peng. We could foresee that land formation and excavation work during construction period would pollute surface runoff, render adverse impact on the stream, and ultimately affect species of mangrove and seagrass in the mudflat. However, we find no attempts of the Applicant to assess potential impact on existing ecological environment.

Details on Ecological Enhancement Area, involving tree planting on government land, are insufficient even though species types have been identified. Section 6.3 of the Landscaping Proposal mentions that "*The species selection should be based on those*

found in the ecological survey or species with special ecological values in this location”, but no ecological surveys have been included in this planning application yet.

The Applicants mentioned that the suspected unauthorized site formation work in the subject site was indeed a series of site investigation field work. Comment made by the Director of Agriculture, Fisheries and Conservation (DAFC) that it is a “destroy first, develop later” approach *“is a misleading, unfair and wrong conclusion”* (Paragraph 2.6 of the Planning Statement). While the applicants stated that the site formation work started in June 2010, indeed the large-scale destruction has been started since 2009 according to CA record. We thus keep maintaining our stance that approving this environmental destructive application would set a disastrous precedent for similar cases in the area.

Yours faithfully

Ng Hei Man

Senior Campaign Officer