Confirmed Minutes of the 258th Meeting of the Advisory Council on the Environment (ACE) on 3 May 2023 at 2:30 p.m.

Present:

Prof John CHAI, BBS, JP (Chairman) Prof Kenneth LEUNG, JP (Deputy Chairman) Ms Carmen CHAN, BBS, JP Dr Sylvia CHAN, MH Ms Ada FUNG, BBS Mr Eric HO Ms Linda HO Mr Alex KWAN Prof Alexis LAU, JP Mr Daryl NG, SBS, JP Mr Albert SU, MH, JP Prof WONG Kam-bo Dr WONG Kwok-yan, MH Dr Raymond YAU Dr William YU Mr Alan LO, JP (Secretary)

Absent with Apologies:

Dr Theresa KWONG Prof Dennis LEUNG Mr Simon NG Ms Christina TANG Prof Dan TSANG

In Attendance:

Dr Samuel CHUI, JP	Director of Environmental Protection, Environmental
	Protection Department (EPD)
Mr Terence TSANG	Assistant Director (Environmental Assessment), EPD
Mr Simon CHAN	Assistant Director (Conservation), Agriculture, Fisheries
	and Conservation Department (AFCD)
Mr Kevin NG	Assistant Director of Planning / Technical Services
	(Acting), Planning Department (PlanD)
Miss Mavis HUI	Chief Information Officer, Environment and Ecology
	Bureau (EEB)
Miss Celia TAM	Principal Information Officer, EPD

Ms Karen CHEK Miss Sally SHEK Miss Avynn WONG	Chief Executive Officer (CBD), EEB Executive Officer (CBD) 1, EEB Executive Officer (CBD) 2, EEB
In Attendance for Item 3:	
Mr Boris KWAN	Senior Nature Conservation Officer (North), AFCD
Dr MA Chi-wai	Senior Environmental Protection Officer (Territory North) 4, EPD
Mr Felix TAI	Environmental Protection Officer (Territory North) 43, EPD
Project Proponent Team	
Civil Engineering and	Mr Chris WONG, JP, Project Manager (North)
Development Department	Mr Gavin WONG, Chief Engineer / North 2
(CEDD)	Mr Daniel LAU, Senior Engineer / 9 (North)
Housing Department (HD)	Ms Ellen NGAN, Chief Architect 1
	Ms Peggy YU, Senior Architect 9
WSP (Asia) Limited	Mr Emeric WAN, Executive Director
	Ms Anny LI, Senior Tree Specialist
Ecosystems Limited	Mr Vincent LAI, Managing Director
	Mr Klinsmann CHEUNG, Ecologist
The University of Hong Kong	Dr May CHUI, Associate Professor

Action

<u>The Chairman</u> welcomed all to the meeting and informed Members that apologies of absence had been received from Dr Theresa Kwong, Prof Dennis Leung, Mr Simon Ng, Ms Christina Tang and Prof Dan Tsang.

Item 1 : Confirmation of the draft minutes of the 257th meeting held on 20 March 2023 (Closed-door session)

2. The draft minutes of the last meeting were confirmed without any proposed amendments.

Item 2 : Matters arising (Closed-door session)

3. There were no matters arising from the minutes of the last meeting.

<u>Item 3 : Reporting of the Additional Information prepared for the EIA report</u> <u>on "Technical Study on Partial Development of Fanling Golf Course Site –</u> <u>Feasibility Study"</u>

(ACE Papers 7/2023, 8/2023 and 9/2023)

4. <u>The Chairman</u> invited Members to refer to *ACE Paper 8/2023* which provided the Additional Information for the Environmental Impact Assessment (EIA) report on "Technical Study on Partial Development of Fanling Golf Course (FGC) Site – Feasibility Study" (Additional Information) submitted by the project proponent, i.e. CEDD, to the ACE on 18 April 2023. A background note on the discussion of the EIA project at the previous EIASC and ACE meetings was prepared for Members' reference vide *ACE Paper 7/2023*. EPD had prepared a note (*ACE Paper 9/2023*) to provide background information on the statutory EIA process regarding the submission of Additional Information.

(The presentation team joined the meeting at this juncture.)

Presentation cum Question-and-Answer Session (Open session)

5. <u>A Member</u> declared that he was a consultant of eco-shoreline trial studies commissioned by CEDD and had collaborated with Ecosystems Limited (the ecological consultant of CEDD) on fishery studies for AFCD. <u>Another Member</u> declared that his wife was a Member of the Hong Kong Golf Club (HKGC). <u>Another Member</u> declared that he was a Member of the Antiquities Advisory Board (AAB), but did not come across the FGC project during his service. <u>Another Member</u> declared that some Members of the Board of Directors of her company were Members of HKGC. Bearing in mind that no decision-making was required for this agenda item, <u>the Chairman</u> agreed that the above Members could stay and participate in the discussion.

6. <u>The Chairman</u> informed Members that HKGC had sent in an email and a letter to the ACE giving its comments on the agenda item. The relevant email and letter had been circulated to Members before the meeting. <u>The Chairman</u> invited CEDD and EPD to address the comments from HKGC at the meeting.

7. <u>Mr Terence Tsang</u> of EPD briefed Members on the statutory framework of the EIA Ordinance (EIAO) and the purpose of this meeting. Following EPD's introduction, <u>Mr Chris Wong</u> gave an opening remark and <u>Mr Gavin Wong</u> introduced the Additional Information with the aid of a PowerPoint presentation.

Ecological Surveys

8. To address <u>a Member</u>'s question, <u>Mr Gavin Wong</u> advised that CEDD's additional surveys were conducted in accordance with the recommendations of the ACE and the requirements of EPD as stated in its letter of 31 August 2022. <u>Another</u>

<u>Member</u> enquired about the reasons for CEDD to focus on validating the findings in the EIA report instead of giving a separate analysis of the findings in the additional surveys. <u>Mr Wong</u> responded that the purpose of the additional surveys was to supplement the data for certain time periods such as early morning for the bird survey and midnight for the moth survey. <u>Mr Vincent Lai</u> added that 56 bird species were found in the ecological surveys of the EIA report while 54 were found in the additional survey which showed that the findings were similar.

9. <u>A Member</u> pointed out that HKGC had conducted additional surveys during the same time period as CEDD, but had found significantly more species. As the potential damage to the environment and ecology would be irreversible once the construction works begun, <u>two other Members</u> expressed concern about the substantial differences in the ecological baseline data collected by CEDD on birds, moths, bats and trees as compared with that collected by HKGC. <u>One of the two Members</u> remarked that Members could only give comments on the project based on CEDD's findings, thus the validity of the ecological data would be important for the ACE to offer views.

10. <u>A Member</u> expressed that the previous findings of HKGC and comments of other relevant academics and experts received by the ACE last year should be circulated to all new Members so that they could have a fuller picture of the project. <u>Another Member</u> indicated that the hyperlinks provided by HKGC to the ACE which were circulated to all Members before the meeting had already included their previous findings.

11. In response to Members' questions on the differences between the findings of HKGC and CEDD, Mr Emeric Wan shared his understanding about the ecological data of HKGC which was accumulated from their surveys conducted over the years with longer durations, beyond the current project scope and covering the entire golf course of 172 hectares (ha) whereas the ecological survey of CEDD had focused on the much smaller proposed development areas. Mr Simon Chan explained that standard sampling method would be adopted in EIA studies as the purpose was to obtain baseline ecological data for assessment. Given the differences in the purposes and methodologies of the ecological surveys between the two parties, the findings would naturally be different. For instance, the consultants had previously explained that prolonged lighting in light trap might attract and collect insects outside the project site. He confirmed that the survey methodologies adopted by CEDD were adequate and in compliance with the requirements under the EIAO. Mr Gavin Wong stressed that their additional surveys were conducted in accordance with the ACE's recommendations.

12. In response to <u>the Chairman</u>'s enquiry, <u>Mr Terence Tsang</u> also confirmed that the EIA report of CEDD, including the methodologies of the ecological surveys, complied with the relevant requirements set out in the Technical Memorandum on the Environmental Impact Assessment Process (TM) as well as the EIA Study Brief. <u>The Chairman</u> remarked that the ACE relied on the expert advice of EPD and AFCD

on the validity of CEDD's ecological survey and data since the ACE Members were not all ecological experts.

13. Noting the significant differences between the findings of CEDD and HKGC, <u>four Members</u> suggested that the Government should compare and clearly illustrate the causes of the deviations arising from the scopes and methodologies of the surveys as well as the framework of the EIAO to alleviate the public's concern. <u>Another Member</u> suggested that CEDD might perform statistical analysis of the data of the additional survey and the original survey in the EIA report for more professional presentation.

Detailed layout plan

14. <u>A Member</u> recapped that the ACE had suggested CEDD to revise the layout plan which should illustrate the location of the trees to be retained as well as the location, disposition and design of the proposed housing blocks with a view to minimising the adverse ecological impact as well as preserving the 0.39 ha of woodland in Sub-Area 1. While appreciating the importance of balancing the need for development and environmental conservation, the Member and five other <u>Members</u> were disappointed that CEDD had neither revised the layout plan nor adjusted the housing blocks to preserve the woodland concerned. Even if the layout of the housing blocks was to remain unchanged, <u>one of the above Members and another Member</u> opined that more details on the layout plan such as the principal datum and topography of the proposed development area should be provided for Members' reference.

15. <u>A Member</u> questioned the need to place a special school within the project site at the expense of removing the woodland. She opined that there were other alternatives such as accommodating the special school in closed down school premises. <u>Two other Members</u> added that, with suitable design and disposition, it looked feasible to place some of the housing blocks in the north of the project site and more trees could be retained. <u>One of the above Members</u> further suggested that a unique design should be adopted for the housing estates to set it as an international exemplar. <u>Another Member</u> hoped that CEDD would take Members' suggestions into sincere consideration to better conserve the environment. Having said that, <u>the Member</u> was generally satisfied with the Additional Information and took the view that the development pace should be expedited.

16. With reference to HKGC's letter which claimed that 460 trees were missing in CEDD's findings, <u>a Member</u> questioned the reasons behind and stressed the importance of data accuracy and comprehensiveness of the project proponent's surveys. Pointing out that most of the trees of the 0.39 ha of woodland were native species of decades old, <u>the Member</u> elaborated and echoed by <u>another Member</u> that the significance of those trees in terms of carbon absorption ability and ecological values for providing habitats to wild lives were incomparable with the compensated tree seedlings. He added that the large trees along the road side should also be

retained as far as practicable. <u>One of the above Members</u> urged CEDD to revise the layout plan taking into account the ACE Members' comments before submitting the Additional Information to the DEP.

17. <u>Mr Gavin Wong</u> explained that based on the 11 criteria set out in the TM, the ecological value of the woodland in question was low to medium as reported in the EIA report. The woodland was proposed to be removed to accommodate an integrated commercial cum carpark complex, a residential block above the complex as well as the public transport interchange. Notwithstanding the aforesaid, CEDD would further explore the possibility to retain the woodland in the next stage. Regarding the project constraints including building height and number of housing units, <u>a Member</u> indicated that CEDD should think out of the box to come up with creative solutions to protect the environment.

Handling of the Grave

18. <u>Two Members</u> considered that CEDD should accord priority to retain the existing grave in Sub-Area 1 on-site by adjusting the design of the housing layout plan instead of relocating it elsewhere. <u>Mr Gavin Wong</u> said that there would be potential conflicts with the proposed housing development if the grave was to be retained. CEDD's initial plan was to liaise with the descendant of the grave owner for relocating it according to the established procedures. In response to <u>the Chairman</u>'s question, <u>Mr Wong</u> confirmed that CEDD had already identified the descendant concerned with a view to achieving an agreement for the arrangement of the grave. <u>Another Member</u> pointed out that CEDD should have included the relevant information on how the grave would be handled in their presentation.

Antiquities Assessment Board

19. In response to <u>a Member</u>'s enquiry about the grading assessment progress of the FGC site, <u>Mr Terence Tsang</u> advised that the grading assessment of AAB was not part of the eight Additional Information required by the ACE. This notwithstanding, CEDD had written to AAB and asked for their consideration in speeding up the grading assessment process. Pointing out that both CEDD and AAB were overseen by the Development Bureau, <u>another Member</u> held the view that there should be better collaboration between the relevant Government bureau and departments to expedite the review. <u>Dr Samuel Chui</u> reminded Members that the grading assessment was not a requirement under the EIAO. Given the cultural and historical significance of the project site, <u>one of the above Members</u> suggested that it could be utilised for purposes such as environmental education and opened up for the public to experience the sport.

Site Visit

20. <u>Four Members</u> were of the view that a site visit to the FGC should be arranged for the ACE Members, especially the new ones, before the meeting to

facilitate their understanding of the project. <u>One of the four Members</u> remarked that he had already requested a site visit before the ACE meeting, but regretted that it was not arranged.

21. <u>The Chairman</u> understood that the previous site visit was organised by the project proponent. He would defer to CEDD to consider whether it was necessary and appropriate to organise another site visit.

Conclusion

22. <u>The Chairman</u> recapped that the ACE should follow the statutory procedures in handling the Additional Information. ACE should also honour its decision made in the previous meetings and focus its comments on the eight key topics of Additional Information in the current meeting. Pointing out the significance of the project in terms of the environment, ecology, cultural heritage, sport concerned and competitiveness of Hong Kong, <u>the Chairman</u> remarked that CEDD should treat it as a special project and take into account the comments of the ACE for the betterment of the project.

(<u>A Member</u> left the meeting during the Question-and-Answer Session while the presentation team left at the end of this session.)

Internal Discussion Session (Closed-door)

23. In response to the Chairman's enquiry on the deviation between the data of CEDD and that of HKGC, Mr Terence Tsang responded that he received the information of HKGC shortly before the meeting and had not yet studied the details. He advised that in general EIA surveys and academic surveys with different efforts and methodologies for different purposes, which would yield different results. He pointed out that during the last ACE meeting, ACE Members accepted the overall survey findings of CEDD with the exception of those eight topics on which CEDD was required to provide additional information. Hence, the purpose of this meeting should therefore be focused on these eight piece of Additional Information. shared that for the original bird survey, CEDD had conducted a longer period of survey from 10 am to 10 pm for the EIA report to compensate the early morning period and the survey effort was considered sufficient to record land birds as they would return to the site in the evening. At the last ACE meeting, Members requested CEDD to conduct additional survey during the early morning period and compare the data obtained during 10 am to 10 pm to confirm if the bird survey results were representative and the findings of the EIA Study were correct. For the additional moth survey, the objective was to compare the evening and mid-night survey results to confirm if the original survey were representative and the EIA study findings were correct.

24. With respect to the tree data, <u>Mr Terence Tsang</u> indicated that the differences might be arising from the growth of trees with the lapse of time. <u>The Chairman</u> suggested that a reconciliation table could be prepared to account for the deviation CEDD of tree data between CEDD and HKGC. <u>Mr Tsang</u> responded that he would take <u>the Chairman</u>'s suggestion into consideration and look into the reasons behind.

(*Post-meeting notes: CEDD would follow up and prepare a reconciliation table to EPD in due course.*)

25. In response to <u>a Member</u>'s concern on the project's impact on international golf competitions, <u>another Member</u> shared that the proposed development area was only a small part of the entire FGC site and there would still be sufficient space to hold international competitions. <u>Another Member</u> suggested that the Government should reserve part of the car park in the proposed development area for visitors of HKGC so as to avoid further damages to the remaining area of the FGC site for the construction of a new car park. <u>One of the above Members</u> understood that HKGC users would be allowed to use the car park to be developed in Sub-Area 1.

Conclusive Comments on the Additional Information

(i) Additional Bird Survey

26. <u>The Chairman</u> enquired and <u>Mr Terence Tsang</u> confirmed that the additional survey had reaffirmed that the bird survey in the EIA report was representative. While <u>a Member</u> was satisfied with the result of the additional bird survey, he suggested that CEDD might conduct a statistical analysis to confirm that there was no significant difference between the data collected in the EIA report and the Additional Information. To address <u>Mr Tsang</u>'s concern for the additional statistical analysis, <u>the Member</u> indicated that such analysis could be done within minutes using the data in hand with no additional survey efforts. He said that it would help CEDD strengthen its presentation and conclusion. As the analysis was not included in the recommendation of the ACE in the last meeting, <u>the Chairman</u> considered that it was not necessary to impose a condition for it.

(ii) Additional Moth Survey

27. <u>Mr Terence Tsang</u> confirmed that the additional moth survey had reaffirmed that the relevant findings in the EIA report was representative and the meeting agreed that the ACE had no further comment.

(iii) Details of Bat Survey

28. <u>Mr Terence Tsang</u> recapped that the ACE was generally satisfied with the bat survey findings and only requested for details of the bat survey during the last meeting. <u>The Chairman</u> noted that the details of the bat survey in the EIA report were provided and Members had no further comment in this respect.

(iv) Tree Compensation Plan

29. With regards to the ACE's previous comments on raising the tree compensation ratio to 1:1.5, <u>Dr Samuel Chui</u> cautioned that there would be read across implication on other development projects in the future. <u>Mr Terence Tsang</u> said that it might lead to legal challenge especially for projects of private developers. <u>Dr Chui</u> furthered that the relevant guidelines and regulations on tree removal and compensation ratio were under the purview of the Development Bureau which might not be within the jurisdiction of the EIAO. <u>Mr Tsang</u> considered that it would suffice to increase the establishment period of the compensated trees to three years while maintaining the standard ratio of 1:1.

30. <u>Two Members</u> had no strong views on the tree compensation ratio. <u>One of</u> two Members and another Member stressed that the priority should be retaining the existing trees as far as possible instead of compensating more trees. There should not be a misconception that tree removal would be acceptable as long as the developers could provide tree compensation. While acknowledging tree retention as the priority, <u>the Chairman</u> appreciated the importance of the tree compensation mechanism without which more trees would have been removed over the years.

31. Addressing <u>a Member</u>'s enquiry, <u>Mr Terence Tsang</u> advised that CEDD would be responsible for the maintenance of the trees within the three-year establishment period while other relevant government departments would take up the management responsibility afterwards. As regards <u>another Member</u>'s question, <u>Dr Samuel Chui</u> replied that the management and conservation of the trees in Sub-Areas 2 to 4 would be taken up by the Government. To protect the trees in the project site, <u>another Member</u> suggested that CEDD should devise a detailed tree management plan for the DEP's approval.

(v) Detailed Layout Plan

32. <u>A Member</u> was concerned about the topography of the layout which would affect the survival of the trees to be retained in the area. She reiterated that the project proponent should reconsider if it was really necessary to accommodate a special school in the site the spaces of which could be utilised for accommodating some housing buildings which were planned in the woodland of 0.39 ha. <u>Two other</u> <u>Members</u> echoed with <u>the Member</u> and expressed that site-specific design should be adopted to better utilise the spaces in the north of the project site. <u>One of the above</u> <u>Members</u> suggested that innovative design should be adopted to set the project as an international exemplar. <u>Another Member</u> added that trees in other parts of the project site should also be retained as far as possible.

33. <u>A Member</u> pointed out that the construction time of housing units could be reduced to a quarter of the usual requirement with the use of the latest Modular Integrated Construction technology. He considered that CEDD should take the

time to improve the design and layout of the project as the modern construction technology could help catch up the project schedule. <u>Another Member</u> suggested and echoed by <u>a Member</u> that DEP should incorporate Members' other suggestions raised in the previous ACE meetings such as the incorporation of green wall and green building concepts in his decision.

34. Noting Members' comments during the discussion, <u>Dr Samuel Chui</u> advised that a condition could be imposed for CEDD to revise the detailed layout plan with a view to minimising the adverse ecological impact and retaining the woodland in concern. The meeting considered that it should be set as a mandatory requirement for CEDD to retain the 0.39 ha of woodland. <u>Dr Chui</u> clarified that if CEDD was unable to retain the woodland as required, it would be regarded as a failure to meet the condition and should not be allowed to proceed with the construction.

35. <u>A Member</u> pointed out that according to the EIAO, CEDD could bypass the EIAO framework and proceed with the construction without meeting the condition given that the proposed development area was below 20 ha. While CEDD was not required to go through the EIAO process, <u>Dr Samuel Chui</u> trusted that they would respect the recommendations of the ACE and honour the EIAO mechanism.

(vi) Analysis on Hydrological Impact

36. In response to <u>a Member</u>'s question, <u>Mr Terence Tsang</u> advised that the water demand of the trees to be compensated in Sub-Area 3 had been taken into account in the hydrological impact analysis. According to CEDD's analysis, the proposed development area in Sub-Area 1 and the compensatory tree planting areas in Sub-Area 3 were not the sources of groundwater for Sub-Area 4. In addition, the reclaimed water provided by Shek Wu Hui Sewage Treatment Works could supplement the water demand if needed. Thus, there should be no adverse impact on the hydrology of the site. Members had no further comments on this matter.

(vii) Analysis on Shading Impact

37. <u>A Member</u> pointed out that additional shading impact assessment might be required in case the layout plan would be revised afterwards. <u>Mr Terence Tsang</u> said that CEDD had concluded that there would not be substantial shading impact by the project in different seasons. He considered that further adjustment of the layout plan for the retention of the woodland in concern should not cause more adverse impact. <u>Another Member</u> was concerned that if the building blocks were moved to the eastern side of the project site, sunlight might be blocked. <u>Dr Samuel Chui</u> indicated that there would be read across implication to impose requirement on shading impact. Pointing out that some of the trees in the area were shade tolerant, <u>Mr Simon Chan</u> opined that the shading impact to these trees should not be substantial. <u>One of the above Members</u> remarked and echoed by <u>another Member</u> that if additional shading impact assessment would not be arranged for the revised

layout plan, the Government should ensure that the adjustment in the layout plan would not aggravate negative shading impact over the existing trees in Sub-Area 1.

(viii) Handling of the Grave

38. <u>A Member</u> shared her experience that graves in project sites would usually be retained in housing projects. <u>Another Member</u> indicated and echoed by <u>the</u> <u>Member</u> that even if the grave was to be retained, CEDD should liaise and consult the descendant concerned as the development might have an impact on its Feng Shui. While the ACE considered that priority should be accorded to retain the grave onsite, as CEDD had already been in contact with the affected descendent, <u>the</u> <u>Chairman</u> pointed out that it would be more appropriate to honour the views of the descendant. <u>The Chairman</u> suggested with the support of Members to defer the matter to both parties for discussion and follow up.

Conclusion

39. <u>The Chairman</u> thanked Members for their valuable comments which would be consolidated and submitted to CEDD for consideration. He added that a press release would be issued after the meeting to summarise the views of the ACE.

(Post-meeting notes: A press release summarising the views of the ACE on the project was published after the meeting on 3 May 2023. The ACE gave a reply letter to CEDD with a copy to DEP on 10 May 2023. A copy of the ACE's letter is at Annex.)

(*<u>Two Members</u> left the meeting during the Internal Discussion Session.*)

Item 4 : Any other business (Closed-door session)

40. There was no other business for discussion at the meeting.

Item 5 : Date of next meeting (Closed-door session)

- 41. Members would be advised on the agenda in due course.
- 42. There being no other business, the meeting was adjourned at 5:34 p.m.

ACE Secretariat July 2023

Annex



33/F, Revenue Tower, 5 Gloucester Road, Wan Chai, Hong Kong 香港灣仔告士打道 5 號稅務大樓 33 樓

10 May 2023

Mr WONG Chung-pong, Gavin Chief Engineer / North 2 Civil Engineering and Development Department Unit 2320, Level 23 Tower I, Metroplaza 223 Hing Fong Road Kwai Fong, N.T.

Dear Mr Wong,

Environmental Impact Assessment Report on "Technical Study on Partial Development of Fanling Golf Course Site – Feasibility Study"

I refer to the draft Additional Information on the Environmental Impact Assessment (EIA) Report on "Technical Study on Partial Development of Fanling Golf Course Site – Feasibility Study" submitted by the Civil Engineering and Development Department (CEDD) to the Advisory Council on the Environment (ACE) on 18 April 2023.

2. The ACE noted that the draft Additional Information is prepared in response to the ACE's previous recommendation to the Director of Environmental Protection (DEP) on 24 August 2022, namely CEDD should submit Additional Information on eight key topics to the DEP to facilitate his conclusion of a decision and CEDD should report such information to the ACE once available.

3. At its meeting held on 3 May 2023, the ACE carefully deliberated CEDD's submission and considered that six out of eight key topics of the Additional Information, namely conducting an additional bird survey for seven months and an additional moth survey for two months; providing further details of the bat survey; formulating tree compensation and management plans; submitting detailed analysis on the hydrological impact and the shading impact of the proposed housing blocks to the trees were in general sufficient to establish the conclusion in the EIA report. While noting the differences of the CEDD's

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findings in the bird, moth and bat surveys as compared with those carried out by other parties could be caused by factors such as differences in purpose, scope or duration of the surveys, the ACE considered that the CEDD could better illustrate and convey the matter to the public to facilitate the latter's understanding of the causes of the differences. As for the other two key topics of the Additional Information, namely a detailed layout plan of the proposed housing development and how the grave situated in Sub-Area 1 should be handled, the ACE considered that CEDD had not fully addressed the concern of the ACE.

4. The ACE gave the following comments on the eight key topics of the draft Additional Information for CEDD's consideration –

(i) Additional Bird Survey

CEDD could perform statistical analysis to compare the collected data in the additional bird survey with that of the original survey mentioned in the EIA report to better present the data and, where appropriate, re-validate the findings resulting from the survey(s).

(ii) Additional Moth Survey

- No further comment.

(iii) Details of Bat Survey

- No further comment.

(iv) Tree Compensation Plan

The ACE considered that a detailed Tree Management Plan should be put in place to set out the arrangement for tree compensation and maintenance.

(v) Detailed Layout Plan

Given the characteristics of the project site including its history, there should be site-specific considerations in devising the layout plan. The detailed layout plan of the proposed housing development should be revised, such as through: (i) adjusting the location, disposition, density and/or design of the proposed housing blocks; and (ii) reconsidering the need and allocation of the ancillary and community facilities and school etc., to entail the preservation of the 0.39 hectares of secondary woodland as well as to maximise the number of existing trees to be retained in Sub-Area 1 (e.g., those large trees along the road side without direct conflict with the proposed housing blocks and main facilities).

(vi)

Analysis on Hydrological Impact No further comment.

(vii) Analysis on Shading Impact

- No further comment, provided that adjustments in the layout plan will not aggravate negative shading impact over the existing trees in Sub-Area 1.

(viii) Handling of the Grave

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Given that CEDD is in contact with the affected descendent, the ACE considered that the matter should be discussed and followed up between the two parties.

5. More details of ACE Members' comments and views will be recorded in the relevant meeting minutes which will be published on the website (https://www.eeb.gov.hk/en/boards_committees/advisory_council/maincontent.ht ml) once ready.

Yours sincerely,

(Alan Lo)

Secretary Advisory Council on the Environment

c.c. DEP

(Attn: Mr TSANG Sai-wing, Terence, Assistant Director (Environmental Assessment))