

Attachment 3

Revised Land Contamination Review.

SECTION 12A APPLICATION

To rezone the Application Site from “Other Specified Uses” annotated “Business” to “Residential (Group E) 2” at Lot 316 in D.D. 444 and Kwai Chung Town Lot (KTCL) 146, 97-107 Wo Yi Hop Road, New Territories

Land Contamination Review

September 2025

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1. Introduction

1.1. Background

- 1.1.1. The Subject Site is situated in the north-eastern part of the Kwai Chung District accessible from Wo Yi Hop Road. It is zoned “Other Specified Uses” annotated “Business” (“OU(B)”) under Kwai Chung Outline Zoning Plan (No. S/KC/32) with building height restriction of 130mPD.
- 1.1.2. It is proposed to be redeveloped into a 28-storey Commercial-cum-Residential Development with Social Welfare Facilities (Residential Care Home for the Elderly and/or Residential Care Homes for Persons with Disabilities) (RCHEs and/or RCHDs) with a maximum total plot ratio of 6.0 (for flat and shop and services) and maximum building height of 130mPD. In addition, a maximum gross floor area of 12,000 m² for Residential Care Home(s) for the Elderly and/or Residential Care Home(s) for Persons with Disabilities shall be provided.
- 1.1.3. The Applicant seeks town planning permission from the Town Planning Board (TPB) for a Section 12A planning application for proposed rezoning “Other Specified Uses” annotated “Business” (“OU(B)”) to “Residential (Group E) 2” (“R(E)2”) to facilitate the redevelopment. In view of the redevelopment of an existing industrial building, a land contamination review is prepared to assess the potential land contamination impact at the subject site, if any.
- 1.1.4. The land contamination review has been conducted in accordance with the following guidelines:
 - EPD Guidance Note for Contaminated Land Assessment and Remediation.
 - EPD Practice Guide for Investigation and Remediation of Contaminated Land.
 - Guidance Manual for Use of Risk-Based Remediation Goals for Contaminated Land.

1.2. Subject Site and its Environs

- 1.2.1. The Subject Site is currently occupied by Park Sun Building, a 15-storey industrial building (IB). It is surrounded by a mix of industrial, commercial and residential developments in the area.
- 1.2.2. According to the lease, the subject site shall be used for general industrial / godown purposes excluding offensive trades. The Park Sun Building has been erected at the subject site since 1974 and no redevelopment is observed with reference to the Occupation Permit (OP) and the approved General Building Plan (GBP). It is currently used as a car park on LG/F and for industrial uses from G/F, which is the ground level to Wo Yi Hop Road, up to 13/F.
- 1.2.3. The Subject Site is currently bounded by Wo Yi Hop Road to the east (with residential development on the opposite side), industrial buildings to the north and west, and an office building named iCity to the south. **Figure 1.1** shows the location of the Subject Site and its Environs.

Figure 1.1 Location Plan of Park Sun Building (indicated in red box)



1.3. Proposed Development

- 1.3.1. The proposed development comprises of one 28-storey building block providing the commercial, residential and RCHEs and/or RCHDs atop 1 basement floor. It could provide a total of 253 private housing units. The proposed RCHEs and/or RCHDs is located below the aforementioned residential portion to provide a range of 280-380 beds in total.

2. Land Contamination Review

2.1. Background and Site Description

- 2.1.1. With respect to this land contamination review, a desktop review (including the review of historical land uses, information collected from relevant government departments) was conducted.
- 2.1.2. According to the information from the Applicant, the Park Sun Building was built in 1974 and records can be found from the Building Records Access and Viewing On-Line (BRAVO) of Building Departments (BD) (**Appendix 1**). The industrial building is still present with a 50-year completion.

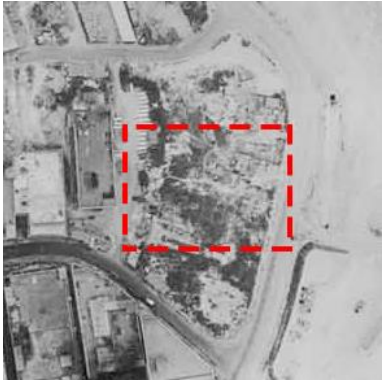
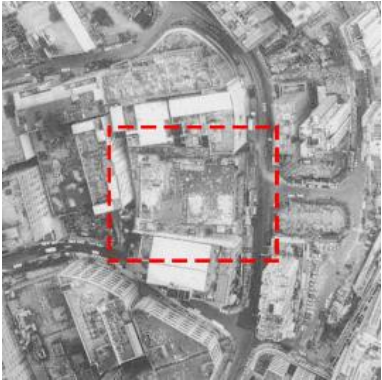
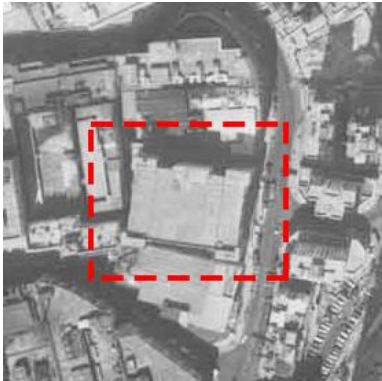
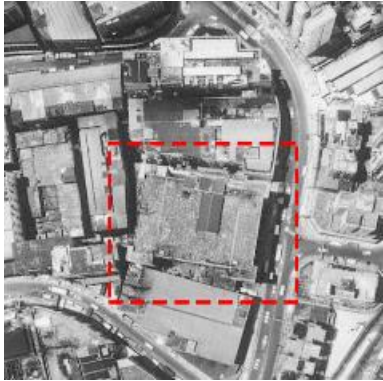
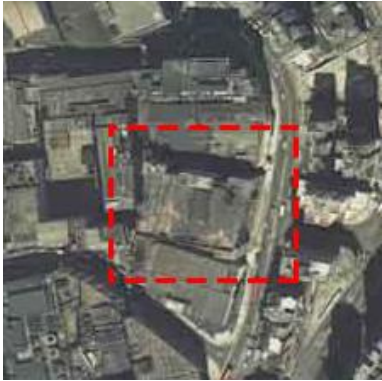
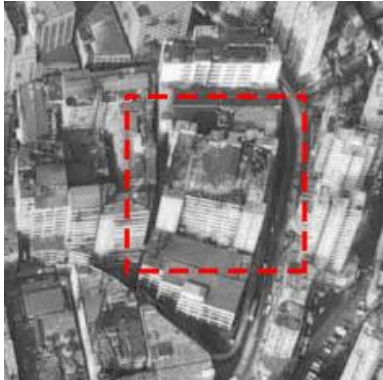
2.2. Historical Review of Land Use

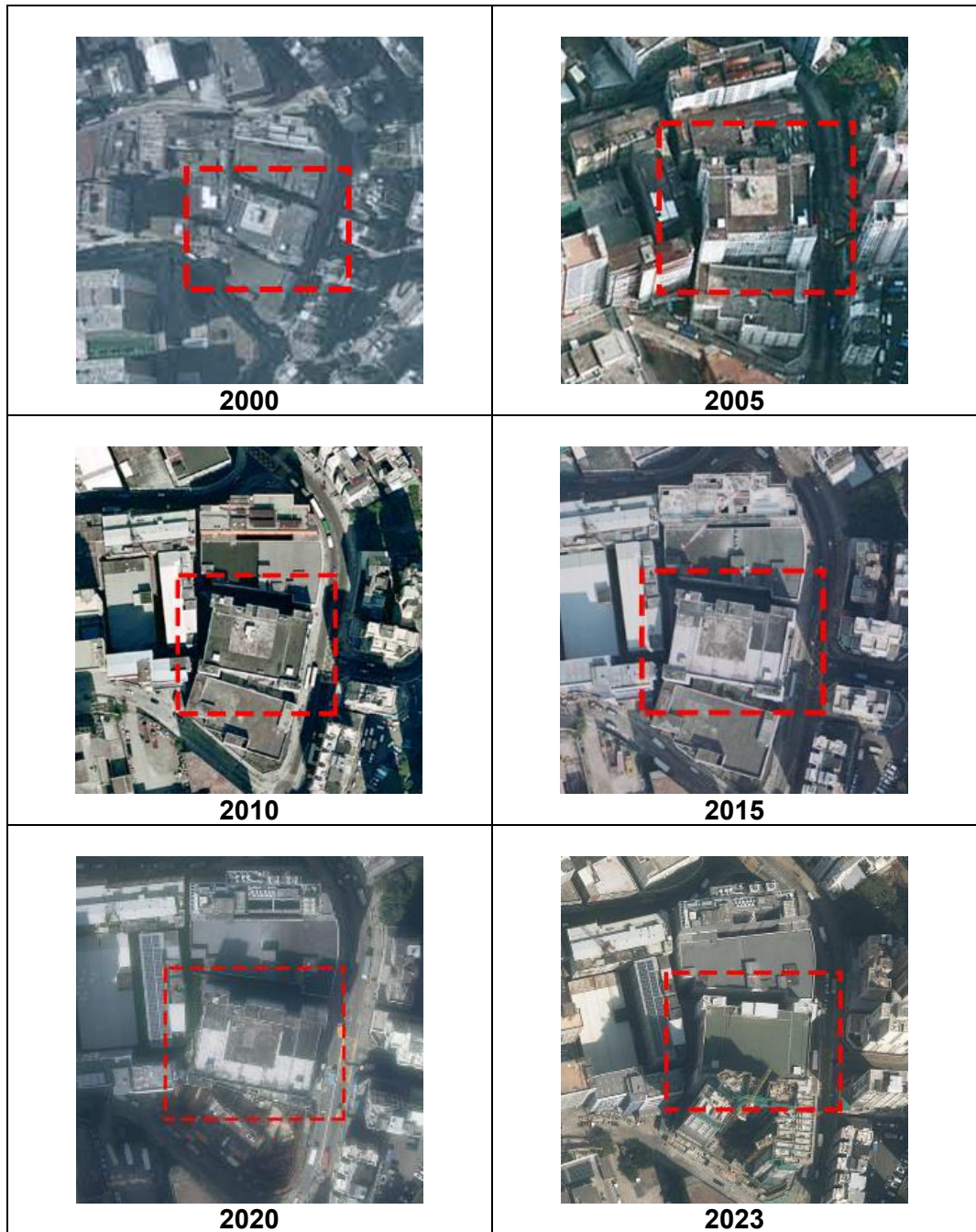
- 2.2.1. Historical aerial photographs are obtained and reviewed from Survey and Mapping Office of Lands Department (LandsD) to evaluate the likelihood of potential contamination associated with past uses of the Site. The reviewed aerial photographs are summarized below in **Table 2.1**, and the selected photographs are provided in **Table 2.2**:

Table 2.1 Review of Historical Aerial Photographs

Year	Height (feet)	Reference No.	Observations
1967	3900	1967-5285	Flat and Vacant Land
1973	2400	04477	Under Construction
1974	12500	09781	Park Sun Building
1976	4000	13221	Land use was the same as in 1974.
1981	2000	38382	Land use was the same as in 1974.
1985	5000	CN00900	Land use was the same as in 1974.
1990	4000	A23543	Land use was the same as in 1974.
1995	3500	CN11105	Land use was the same as in 1974.
2000	6000	CN28060	Land use was the same as in 1974.
2005	4000	CW65348	Land use was the same as in 1974.
2010	6000	CS29194	Land use was the same as in 1974.
2015	6000	CS57485	Land use was the same as in 1974.
2020	6900	E110065C	Land use was the same as in 1974.
2023	6900	E193914C	Land use was the same as in 1974.

Table 2.2 Selected Aerial Photographs

 1967	 1973
 1974	 1976
 1981	 1985
 1990	 1995



2.2.2. Based on the aerial photographs reviewed, the Subject Site was vacant until 1973 that sign of construction was found in 1973. The Park Sun Building has been in operation no later than 1974 until now.

2.2.3. With reference to the BRAVO, there is only 1 building record about the Subject Site, which is Park Sun Building, up to the report assessment date (**Appendix 1**).

2.3. Acquisition of Local Authority Records

- 2.3.1. The Environmental Protection Department (EPD) , Fire Services Department (FSD), and CLP Power Hong Kong Limited (CLP) were approached to obtain the information of chemical waste and dangerous goods.
- 2.3.2. As replied by EPD, there was no chemical waste spillage / incident record onsite in the past 2 years between 2021 and 2023 (**Appendix 2**).
- 2.3.3. As replied by FSD, neither records of dangerous goods, nor incidents of spillage / leakage of dangerous goods were found onsite. The reply letter from FSD (**Appendix 3**) is attached for your reference.
- 2.3.4. As replied by CLP, no polychlorinated biphenyls (PCBs) or PCB-containing oil are involved as the dielectric fluid in the transformer equipment installed on LG/F. There are also no recorded incidents of oil spillage, leakage, or contamination related to the transformer during its operation or maintenance history (**Appendix 4**).

2.4. Site Visit

- 2.4.1. A site visit was carried out on 2nd April 2025 and 25th July 2025 to identify potential source of contamination. A Site Walkover Checklist has been completed on the latter date on LG/F and G/F together with the Tenant's representative, as stipulated in the EPD's Practice Guide, and is included in **Appendix 5**. Photo records of the Subject Site on both floors have been taken and are provided in **Appendix 6**.
- 2.4.2. LG/F is general parking and drop-off areas paved with concrete in good condition. No sign of chemical spillage, pollutant nor potential source of contamination are observed.
- 2.4.3. G/F is comprised of a public vehicle park on the west side of the Site, and a vehicle repair workshop on the east side with a shopfront facing Wo Yi Hop Road. According to **Appendix 6**, hydraulic fluids and cleaning solvents are stored on site, but there was no spillage / leakage / contamination on site and in the past.

3. Conclusion

- 3.1.1. After reviewing the historical aerial photos of the site, the Park Sun Building has been in operation since 1974 and has had no other use.
- 3.1.2. Responses from the FSD, EPD and CLP indicate that there are no chemical waste spillage or incidents on the site within the past two years, nor any records of dangerous goods or associated spillage/leakage incidents.
- 3.1.3. The car park on LG/F and G/F are in operation on paved grounds. A vehicle repair workshop is also present on the G/F shop. Both floors show no sign of chemical spillage, pollutant nor potential source of contamination are observed.
- 3.1.4. Based on current information, the Subject Site most likely shows no indication of land contamination. However, further site re-appraisal will be conducted at the next Section 16 planning application stage to determine whether potential contamination sources are present in the Subject Site. Should the site re-appraisal reveal potential contamination, a detailed land contamination study, including a Contamination Assessment Plan (CAP), Environmental Site Investigation (SI) and Contamination Assessment Report (CAR), if necessary, will be prepared to determine the presence and extent of contamination on the Subject Site. Any required land contamination assessment and/or remediation works will be completed prior to the commencement of construction, in accordance with relevant government guidelines.

Appendix 1

BRAVO Records of the Subject Site

A hand-drawn floor plan of a rectangular building. The plan shows several internal walls creating different sized rooms. Dimensions are written in feet and inches along the walls. For example, the top wall has a section labeled '10' 0"'. The right wall has a section labeled '12' 0"'. The bottom wall has a section labeled '10' 0"'. The left wall has a section labeled '12' 0"'. There are also smaller dimensions for the internal rooms, such as '4' 0" and '6' 0" for some of the smaller spaces. The drawing is done in ink on a piece of paper.

[illegible][illegible][illegible]

SITE AREA: 12,730.00 SQ. FT. (100000)

PERMISSIBLE ROOF COVERED AREA: 10,120.00 SQ. FT. (100000)

PROPOSED: 10,120.00 SQ. FT. (100000)

100'-0"

100'-0"

80'-0"

80'-0"

10'-0"

10'-0"

PLAN

DATE OF CALCULATION JANUARY 27, 1960 TO FEBRUARY
 , 1960. ✓
 TIME OF DAY
 8-30 AM. ✓

$$\frac{P}{2} = \frac{17.21 \times 10^3 \times \cos 10^\circ}{2} = 8375.50 \text{ lbs}$$

Approved *KSD*
- 4 JAN 1972 -

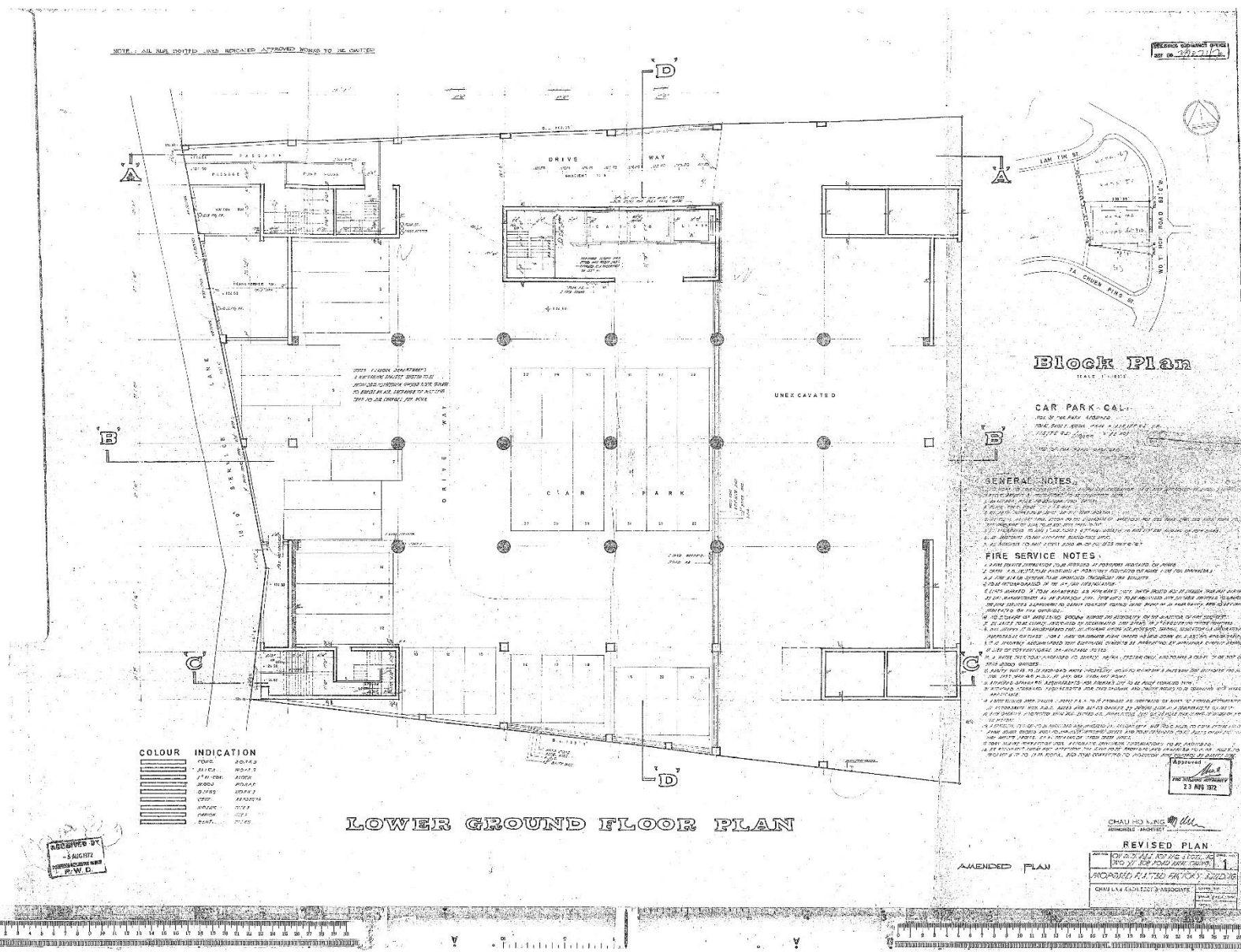
CHAU HO MING *Handwritten signature*
 AUTOBELLER FACTORY

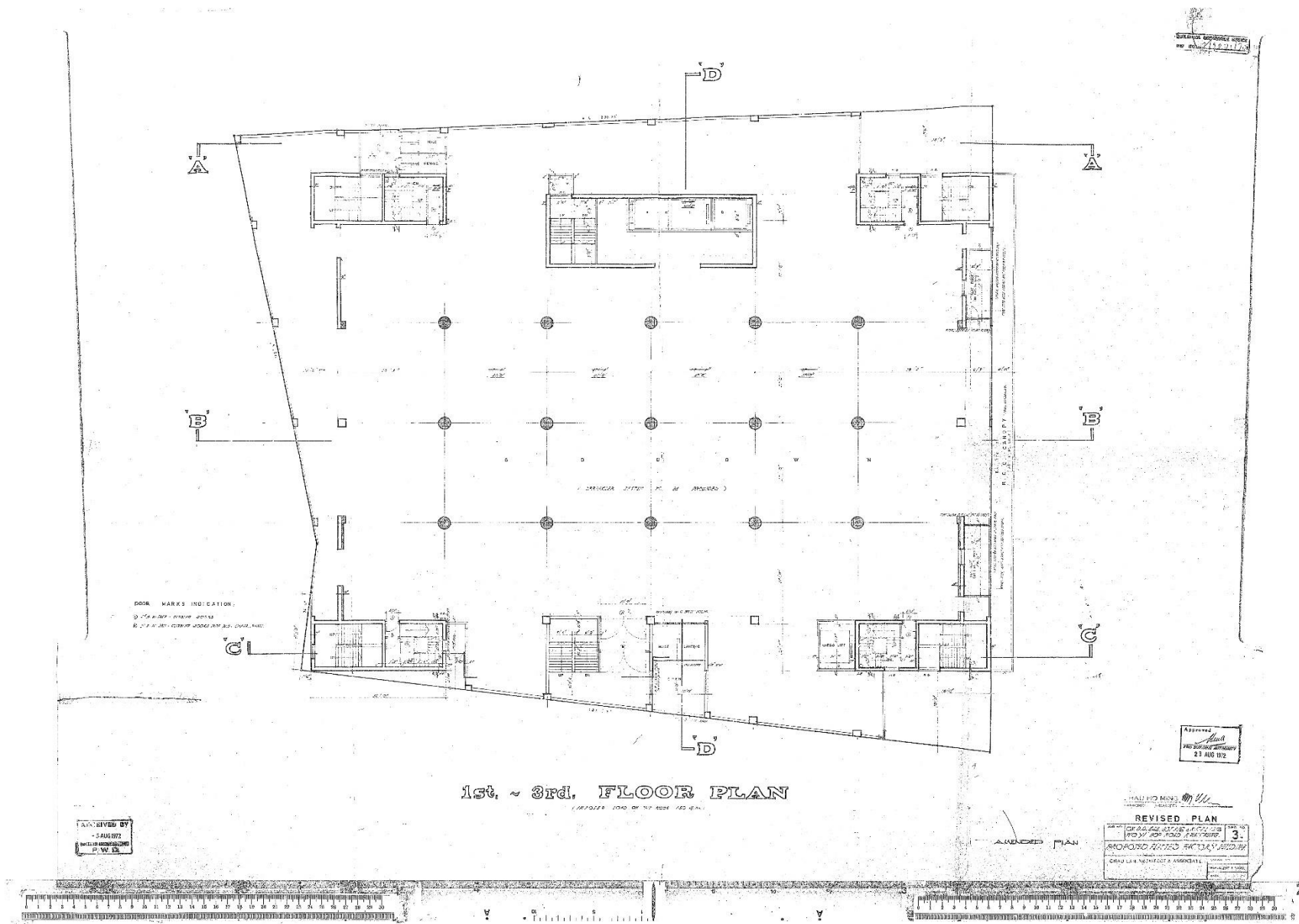
REVISED PLAN

JOB NO.	CHAU HO MING AUTOBELLER FACTORY	JOB NO.
	NO. 10, JOO, JOO, JOO, JOO	14.

PROPOSED FATED FACTORY BUILDING

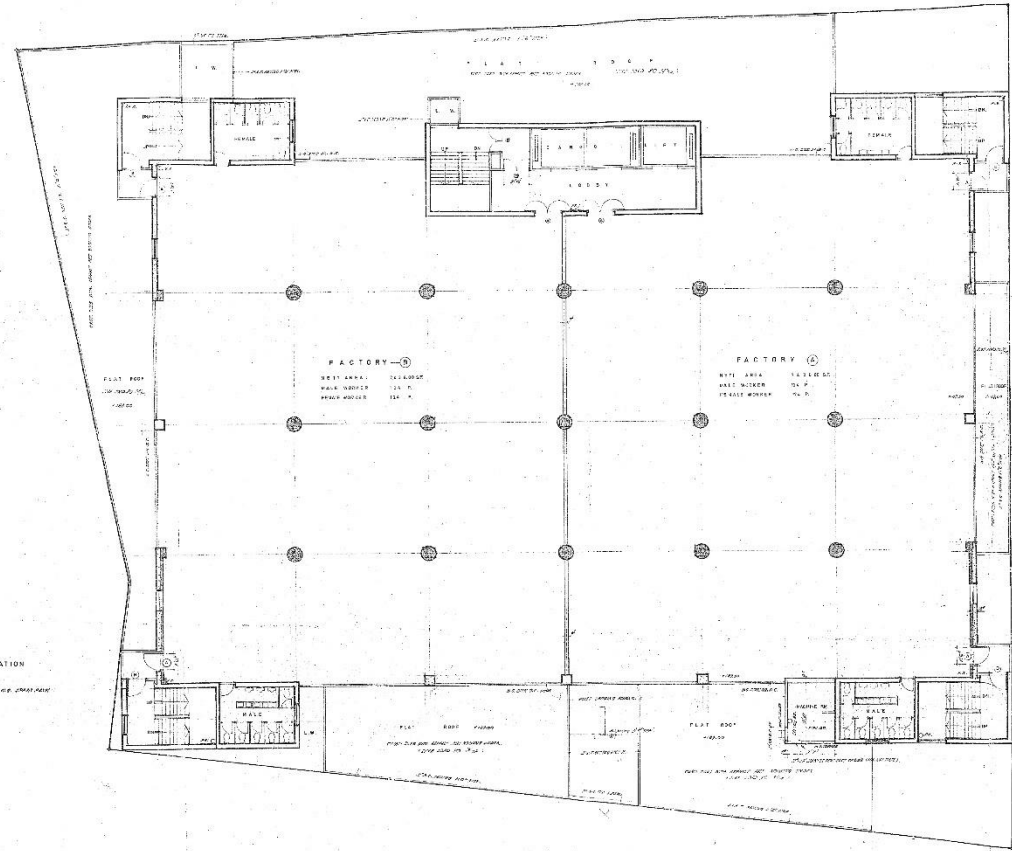
CHAU HO MING ARCHITECT & ASSOCIATE





APPROVED FOR CONSTRUCTION
DATE: 2/28/2012

DOOR MARKS INDICATION
 (1) DOOR MARKS INDICATION
 (2) DOOR MARKS INDICATION



4th. FLOOR PLAN

ALL DIMENSIONS TO BE THE SAME AS SHOWN ON THE 3RD FLOOR PLAN UNLESS OTHERWISE NOTED.
 (1) REPORT LOAD OF THIS FLOOR TO THE 3RD FLOOR

UPPER ROOF FOR MACHINE RM.

APPROVED
 DATE: 2/28/2012

APPROVED BY
 S. SAUWIT
 DATE: 2/28/2012

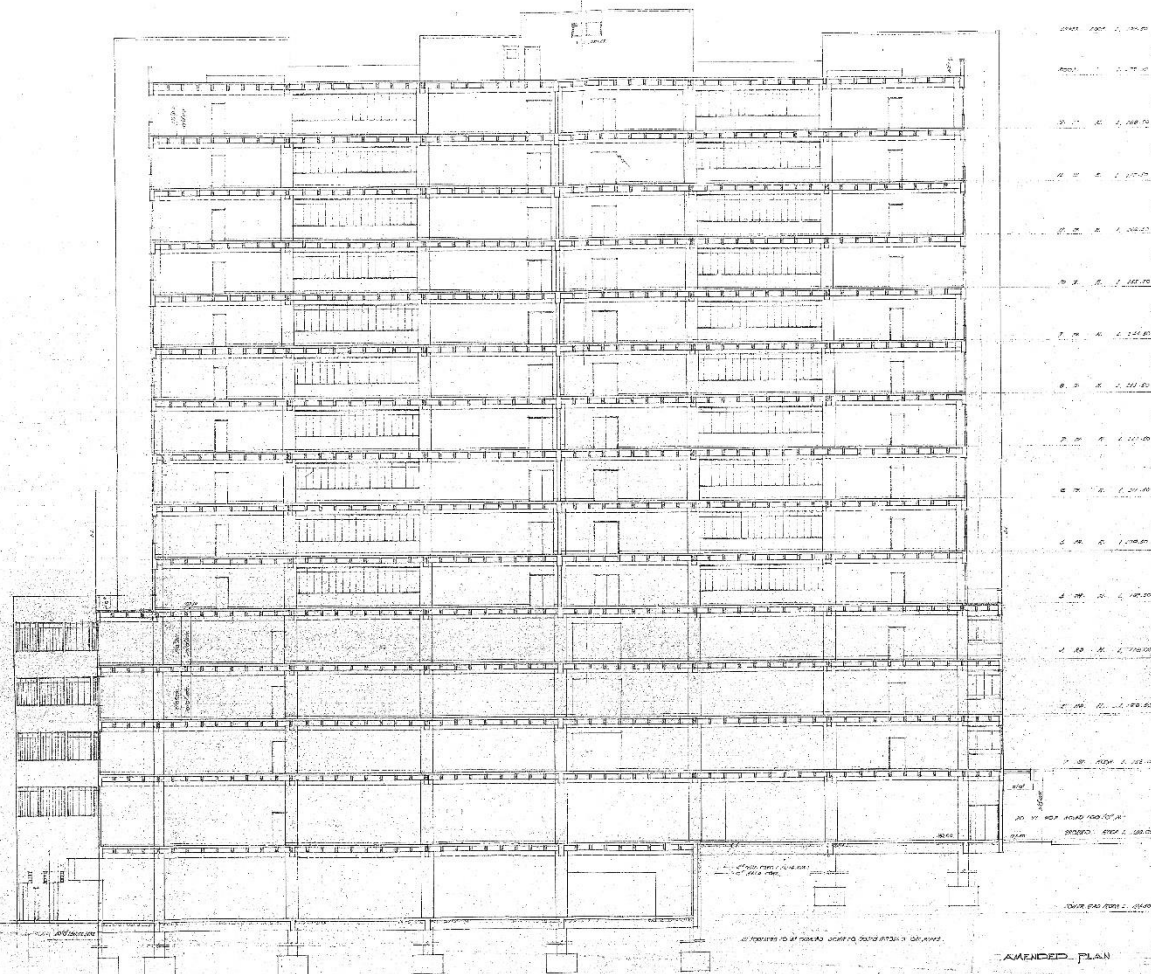
CHAU HO VING

REVISED PLAN

NO. 442/2008/2009/2010/2011/2012
 NO. 442/2008/2009/2010/2011/2012
 NO. 442/2008/2009/2010/2011/2012
 CHAU HO VING ARCHITECT & INTERIOR DESIGNER

ANALYSIS PLAN





Approved
Anna
PRO. ALBERTA. SECRETARY
23 AUG 1972

CHAU HO-MING
ATTORNEY-AT-LAW

REVISSED PLAN

[illegible]

RECEIVED BY
- 5 AUG 1972
P. W. E.

SECTION B. B.

AMENDED PLAN

Appendix 2

Email from EPD responding to Chemical Spillage/ Incident Record



Arthur Ma <arthurmaplanning@gmail.com>

Fw: Inquiry on past incident records of Park Sun Building, Kwai Chung

heidihycheung@epd.gov.hk <heidihycheung@epd.gov.hk>
To: arthurmaplanning@gmail.com
Cc: ericmui@epd.gov.hk

Mon, Jul 15, 2024 at 5:40 PM

Dear Mr. Ma,

This office did not receive any spillage / incident records related to Park Sun Building, Kwai Chung in the past two years (2021-2023). Thanks.

Regards,
Heidi / E(RW)41
Tel: 2417 6067

----- Forwarded by Heidi HY CHEUNG/EPD/HKSARG on 15/07/2024 17:36 -----

From: Arthur Ma <arthurmaplanning@gmail.com>
To: hkfsdenq@hkfsd.gov.hk, hkfsd_dg_enq@hkfsd.gov.hk, aio_fsd@hkfsd.gov.hk, enquiry@epd.gov.hk, hotline_w@epd.gov.hk, psollee@epd.gov.hk
Cc: greg@despacehk.com, marioli@despacehk.com
Date: 09/07/2024 09:33
Subject: Inquiry on past incident records of Park Sun Building, Kwai Chung

Dear Sir/Madam,

We are writing to inquire about the relevant records (e.g. dangerous good storage license, spillage/incident records, licensed chemical waste producers, etc.) of Park Sun Building, which is located at [No. 97-107 Wo Yi Hop Road, Kwai Chung \(Lot 316 in D.D. 444 and Kwai Chung Town Lot \(KCTL\) 146\)](#).

We are currently applying a Section 12A Town Planning Application to the Town Planning Board (TPB) to seek planning permission for a proposed commercial-cum-residential development with social welfare facilities (Residential Care Home for the Elderly and/or Residential Care Homes for Persons with Disabilities) (RCHes and/or RCHDs). We need to check with your department for the relevant records to substantiate whether there is any potential land contamination issue caused by previous operation or past incident.

Please reply to us at your earliest convenience. Should you have any queries, please feel free to contact Mr. Mario Li or myself at 2493-3626. Thank you for your kind cooperation.

Best regards,
Arthur Ma

Appendix 3

**Mail from FSD responding to
Dangerous Goods License/ Incident
Records**

消防處
香港九龍尖沙咀東部康莊道1號
消防處總部大廈



**FIRE SERVICES
DEPARTMENT**
**FIRE SERVICES HEADQUARTERS
BUILDING,**
No.1 Hong Chong Road,
Tsim Sha Tsui East, Kowloon,
Hong Kong.

本處檔號 OUR REF. : (97) in FSD GR 6-5/4 R Pt. 54
來函檔號 YOUR REF. :
電子郵件 E-mail : hkfsdenq@hkfsd.gov.hk
圖文傳真 FAX NO. : 2988 1196
電話 TEL NO. : 2733 7570

30 July 2024

Suit 1601, 16/F,
Tower II, Lippo Centre,
Admiralty, Hong Kong
(Attn: Mr. Arthur MA)

Dear Mr. MA,

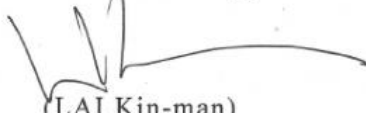
Inquiry on past incident records of Park Sun Building, Kwai Chung
Request for Information of Dangerous Goods & Incident Records

I refer to your email of 9.7.2024 regarding the captioned request and reply below in response to your questions:-

1. No Dangerous Goods Licence was issued in respect of the captioned address.
2. A total of 1 fire incident record was found at the subject location. Please refer to **Appendix A** for details.

If you have further questions, please feel free to contact the undersigned.

Yours sincerely,


(LAI Kin-man)
for Director of Fire Services

Inquiry on past incident records of Park Sun Building, Kwai Chung
Request for Information of Dangerous Goods & Incident Records

No.	Date	Type of incident	Address
1	22/3/2023	Lift Case	No. 97-107 Wo Yi Hop Road

Appendix 4

Mail and Email from CLP Responding to Transformer Records

29 July 2025

DeSpace (International) Limited
Suite 1601, 16/F
Tower II
Lippo Centre
Admiralty, Hong Kong

Attention: Mr. Greg Lam

中華電力有限公司
CLP Power Hong Kong Limited

東西區
East & West Region

香港九龍佐敦道華路一號百周年大樓
Centenary Building, 1 To Wah Road
Jordan, Kowloon, Hong Kong

電話 Tel (852) 2678 3838
傳真 Fax (852) 2678 3737
電郵 Email we@clp.com.hk
網址 Website www.clpgroup.com

Our ref.: WE/L/2510780/25-07/TL/WHF/KSL

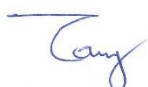
Dear Mr. Lam,

Inquiry Regarding Transformer Operation and Potential PCB/ Oil Spillage at Transformer Room, Park Sun Building

We refer to your letter dated 25 July 2025 regarding the captioned subject, we confirmed that the existing transformers inside the captioned transformer room is free from PCB.

Should you have any queries regarding the above, please contact our Mr. K. S. Lau on telephone number 2678 3826.

Yours sincerely,
for and on behalf of
CLP Power Hong Kong Limited



Tony Leung
Principal Manager – Planning & Design
(East and West Region)

tl:whf:ksl:cl

Information Classification: PROPRIETARY



RE: Inquiry Regarding Potential Oil Spillage at Transformer Room, Park Sun Building

From: Lau, Kin Sang <kslau@clp.com.hk>
Date: Thu 28/08/2025 3:54 PM
To: kenjiwong@despacehk.com <kenjiwong@despacehk.com>
Cc: marioliplanning@gmail.com <marioliplanning@gmail.com>; greg@despacehk.com <greg@despacehk.com>

Dear Mr. Wong,

We have no such record regarding the incidents of oil spillage, leakage, or related contamination.

If you have any queries, please contact me at 2678 3826.

Regards
K S Lau

From: kenjiwong@despacehk.com <kenjiwong@despacehk.com>
Sent: Thursday, August 28, 2025 3:50 PM
To: Lau, Kin Sang <kslau@clp.com.hk>
Cc: marioliplanning@gmail.com; greg@despacehk.com
Subject: Inquiry Regarding Potential Oil Spillage at Transformer Room, Park Sun Building

External email: Please pay attention and check whether the sender is trustworthy before clicking any links and opening any attachments.
--

Dear Mr. Lau,

I refer to the letter sent to Mr. W.H. Fung on 25th July 2025.

As discussed in our telephone conversation, please advise whether there have been any recorded incidents of oil spillage, leakage, or related contamination concerning the transformer at Park Sun Building on 97-107 Wo Yi Hop Road during its operation or maintenance period.

Should you have any queries, please feel free to contact the undersigned.

Regards,
Kenji Wong


T: (852) 2493-3626 | F: 3590-6233
Suite 1601, 16/F, Tower 2, Lippo Centre,
89 Queensway, Admiralty, Hong Kong

Appendix 5

Site Walkover Checklist

Site Walkover Checklist

General Site Details

Site Owner / Client	Lai Sun Textiles Company Limited
Property Address	Park Sun Building
	97-107 Wo Yi Hop Road
	Kwai Chung, New Territories

Person Conducting the Questionnaire

Name	Mr. Kenji WONG
Position	Consultant

Site Description

Describe the topography of the area (flat terrain, rolling hills, mountains, by a large body of water, vegetation, etc.).

Flat concrete paved terrain

State the size and location of the nearest residential communities.

Residential estates directly opposite the building to the east across Wo Yi Hop Road, with the nearest Kam Wa Building approximately 20m, etc.

Are there any sensitive habitats nearby, such as nature reserves, parks, wetlands or sites of special scientific interest?

No

Questionnaire with Existing/Previous Site Owner or Occupier

	Yes/No	Notes
1. What are the main activities/operations at the above address?		LG/F – G/F: Car parking G/F: Vehicle repair workshop Above 1/F: Industrial use
2. How long have you been occupying the site?		Since 1975 – Present
3. Were you the first occupant on site? (If yes, what was the usage of the site prior to occupancy.)	No	
4. Prior to your occupancy, who occupied the site?		LIM POR-YEN, as per land search
5. What were the main activities/operations during their occupancy?		Vacant land, as per aerial photos
6. Have there been any major changes in operations carried out at the site in the last 10 years?	No	
7. Have any polluting activities been carried out in the vicinity of the site in the past?	No	
8. To the best of your knowledge, has the site ever been used as a petrol filling station/car service garage?	Yes	G/F: Vehicle repair workshop
9. Are there any boreholes/wells or natural springs either on the site or in the surrounding area?	No	
10. Do you have any registered hazardous installations as defined under relevant ordinances? (If yes, please provide details.)	No	
11. Are any chemicals used in your daily operations? (If yes, please provide details.)	Yes	Hydraulic fluid
• Where do you store these chemicals?		Chemical drums
12. Material inventory lists, including quantities and locations available? (If yes, how often are these inventories updated?)	No	
13. Has the facility produced a separate hazardous substance inventory?	No	
14. Have there ever been any incidents or accidents (e.g. spills, fires, injuries, etc.) involving any of these materials? (If yes, please provide details.)	No	
15. How are materials received (e.g. rail, truck, etc.) and stored on site (e.g. drums, tanks, carboys, bags, silos, cisterns, vaults and cylinders)?		Delivered by Light Goods Vehicles in chemical drums, usually arriving before midnight

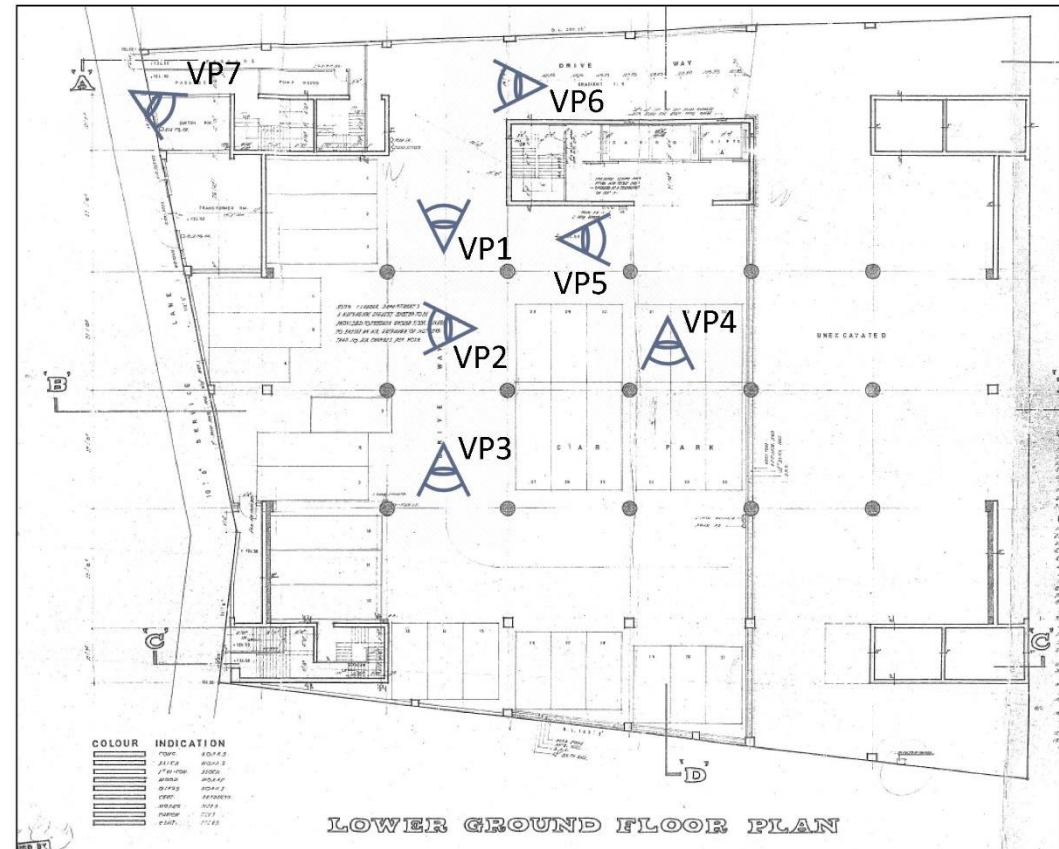
	Yes/No	Notes
16. Do you have any underground storage tanks? (If yes, please provide details.)	No	
• How many underground storage tanks do you have on site?	-	
• What are the tanks constructed of?	-	
• What are the contents of these tanks?	-	
• Are the pipelines above or below ground?	-	
• If the pipelines are below ground, has any leak and integrity testing been performed?	-	
• Have there been any spills associated with these tanks?	-	
17. Are there any disused underground storage tanks?	No	
18. Do you have regular check for any spillage and monitoring of chemicals handled? (If yes, please provide details.)	Yes	
19. How are the wastes disposed of?		Wastes are stored temporarily and delivered to the designated collection point outside the premises by the vehicle repair workshop
20. Have you ever received any notices of violation of environmental regulations or received public complaints? (If yes, please provide details.)	No	
21. Have any spills occurred on site? (If yes, please provide details.)	No	
• When did the spill occur?	-	
• What were the substances spilled?	-	
• What was the quantity of material spilled?	-	
• Did you notify the relevant departments of the spill?	-	
• What were the actions taken to clean up the spill?	-	
• What were the areas affected?	-	
22. Do you have any records of major renovation of your site or rearrangement of underground utilities, pipe work/underground tanks (If yes, please provide details)?	No	
23. Have disused underground tanks been removed or otherwise secured (e.g. concrete, sand, etc.)?	No	
24. Are there any known contaminations on site? (If yes, please provide details.)	No	
25. Has the site ever been remediated? (If yes, please provide details.)	No	

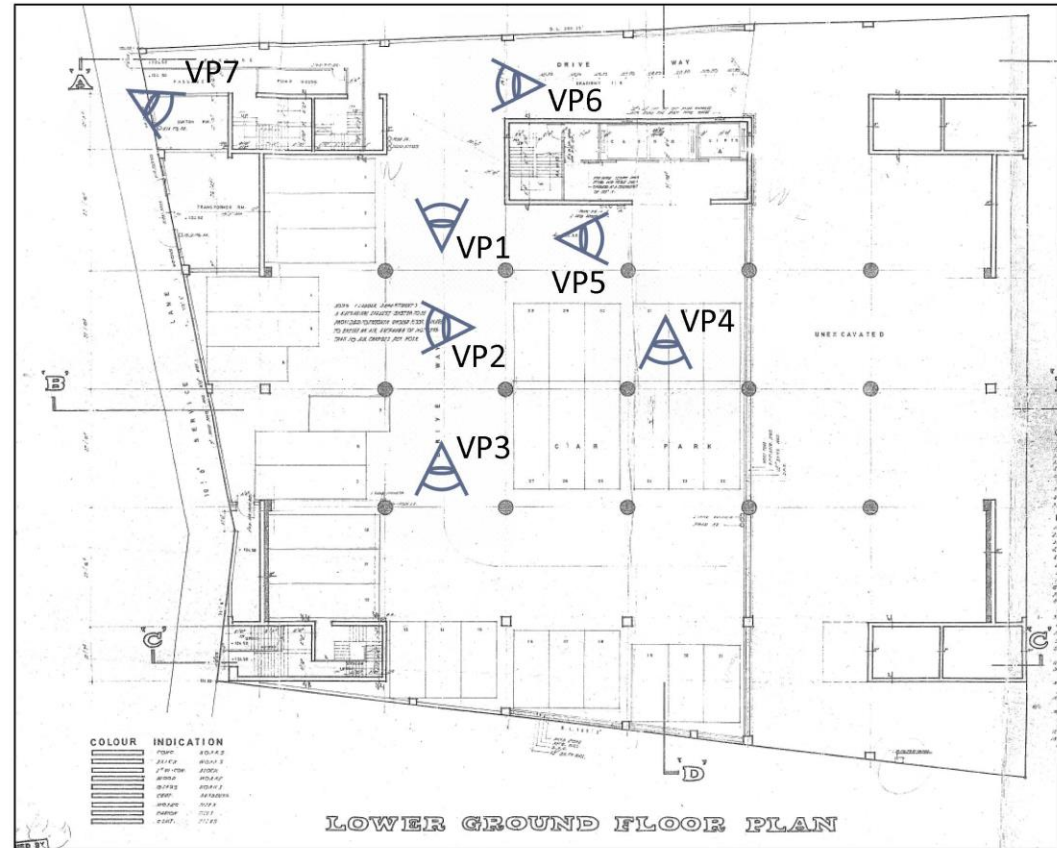
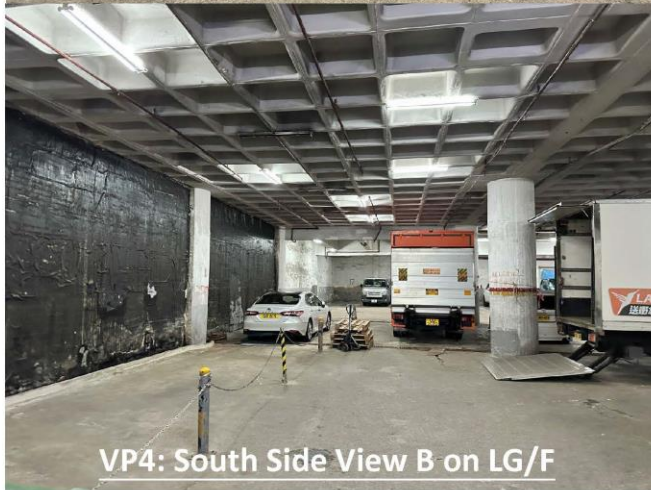
Observations

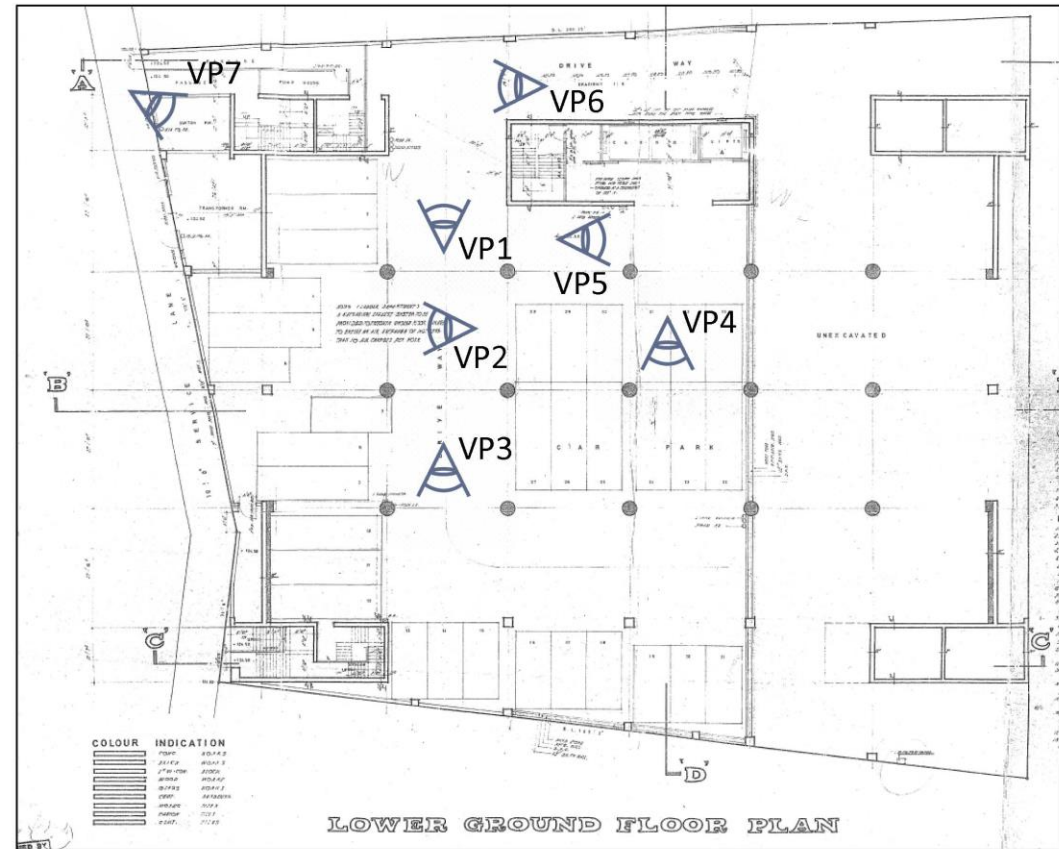
	Yes/No	Notes
1. Are chemical storage areas provided with secondary containment (i.e. bund walls and floors)?	No	
2. What are the conditions of the bund walls and floors?		Concrete paved without clear damage of ground surface
3. Are any surface water drains located near to drum storage and unloading areas?	Yes	
4. Are any solid or liquid waste (other than wastewater) generated at the site? (If yes, please provide details.)	No	
5. Is there a storage site for the wastes?		
6. Is there an on-site landfill?	No	
7. Were any stressed vegetation noted on site during the site reconnaissance? (If yes, please indicate location and approximate size.)	No	
8. Were any stained surfaces noted on-site during the site reconnaissance? (If yes, please provide details.)	No	
9. Are there any potential off-site sources of contamination?	No	
10. Does the site have any equipment which might contain polychlorinated biphenyls (PCBs)?	No	
11. Are there any sumps, effluent pits, interceptors or lagoons on site?	No	
12. Any noticeable odours during site walkover?	No	
13. Are any of the following chemicals used on site: fuels, lubricating oils, hydraulic fluids, cleaning solvents, used chemical solutions, acids, anti-corrosive paints, thinners, coal, ash, oily tanks and bilge sludge, metal wastes, wood preservatives and polyurethane foam?	Yes	Vehicle repair workshop on G/F - Hydraulic fluids and cleaning solvents

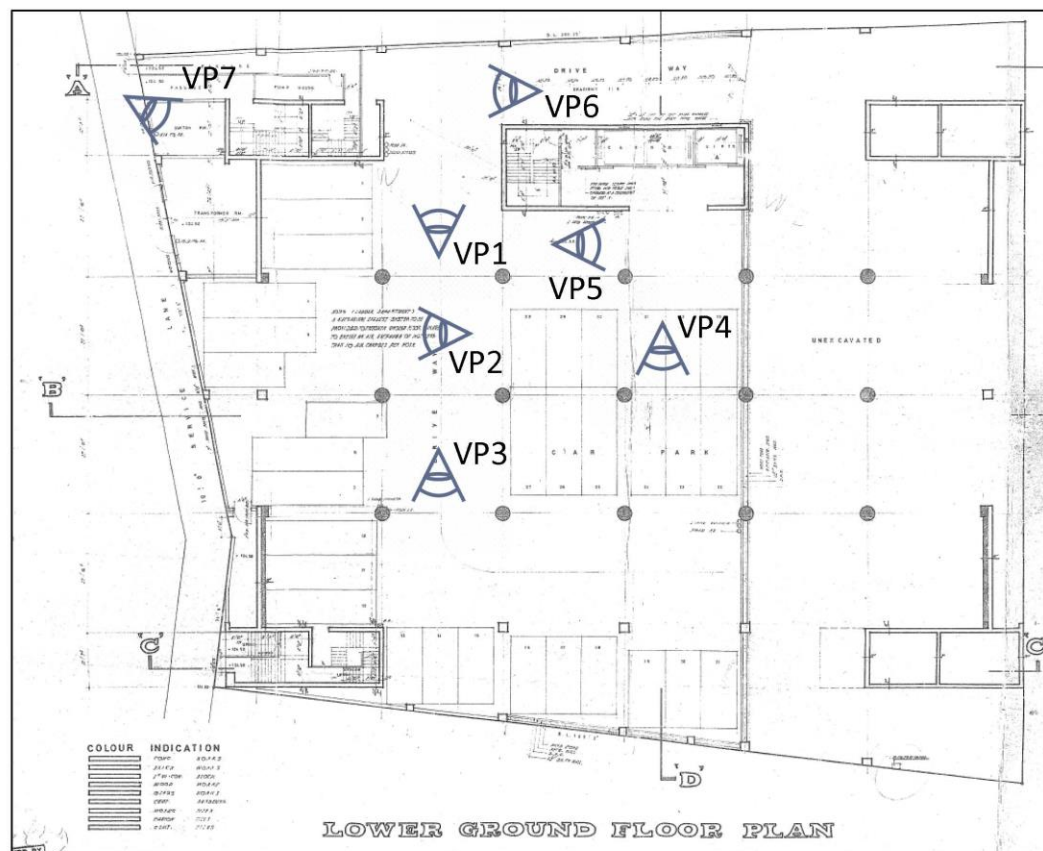
Appendix 6

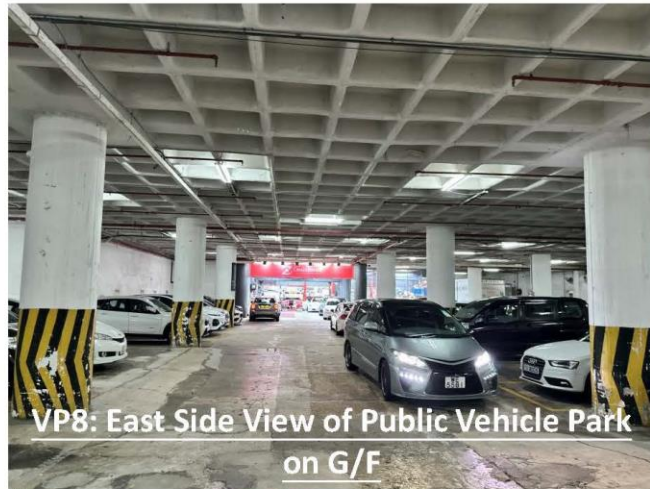
**Photo Records of the Subject Site at
LG/F & G/F**



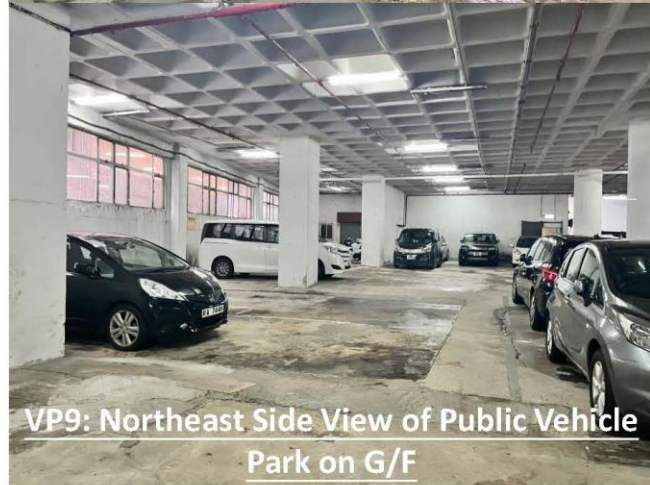




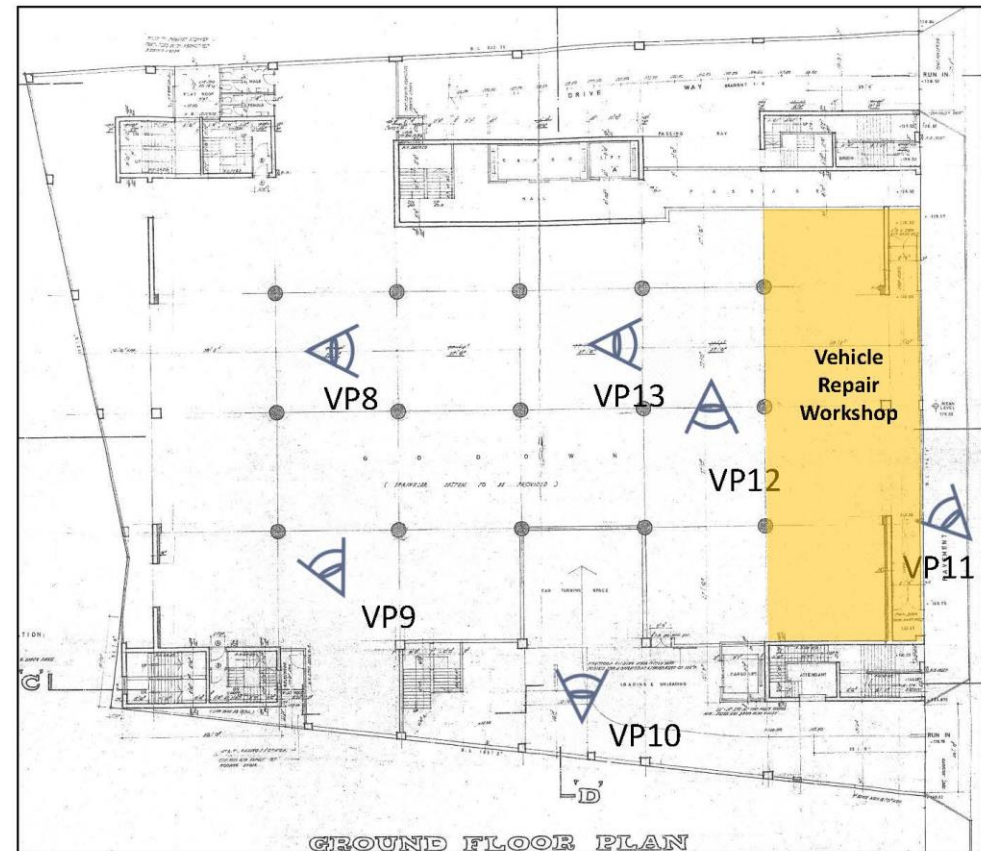


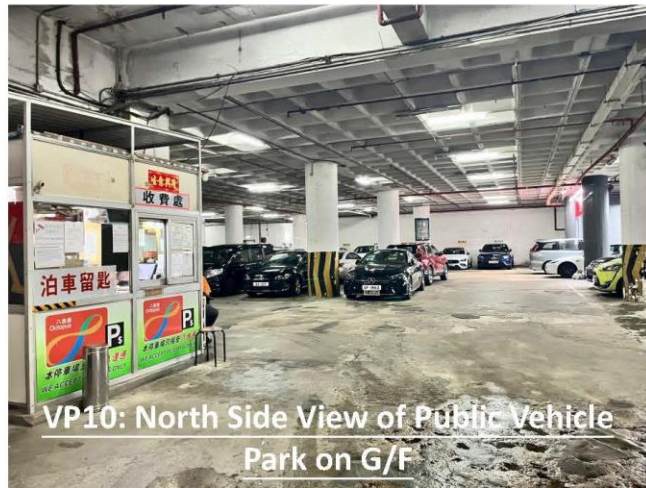


VP8: East Side View of Public Vehicle Park
on G/F

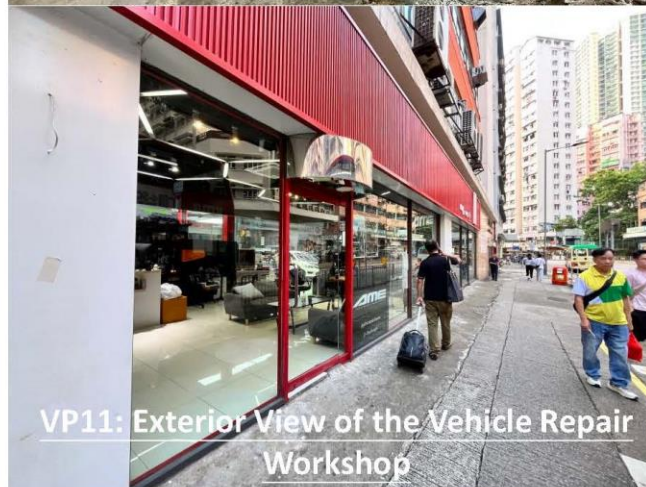


VP9: Northeast Side View of Public Vehicle
Park on G/F

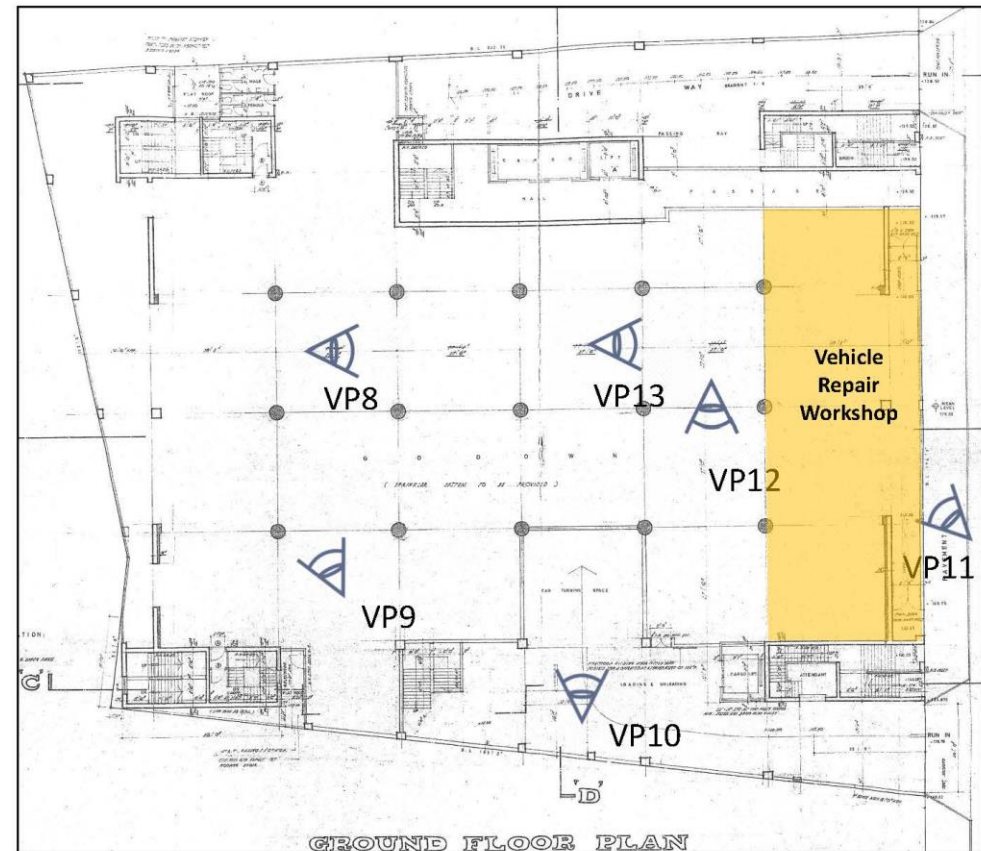


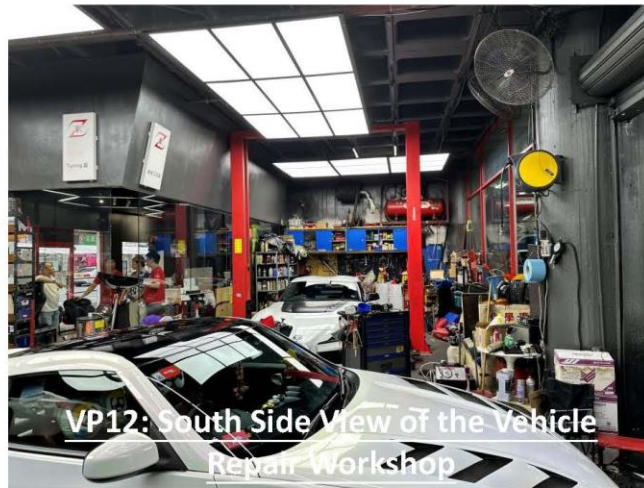


VP10: North Side View of Public Vehicle Park on G/F



VP11: Exterior View of the Vehicle Repair Workshop

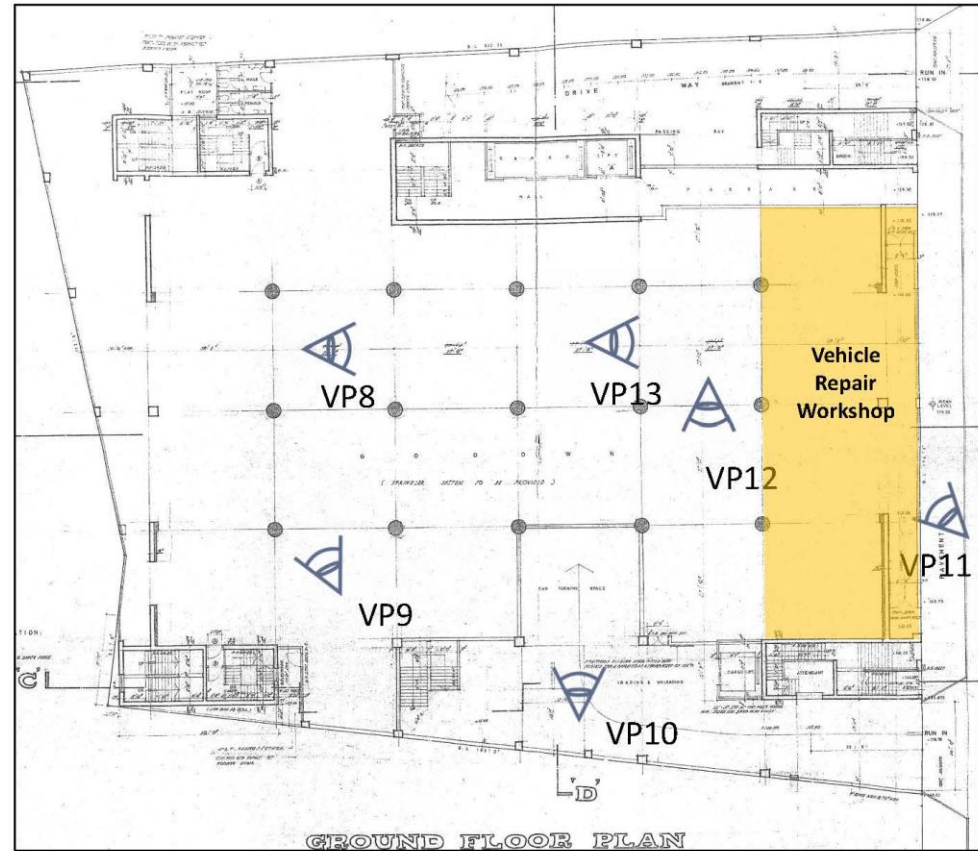




VP12: South Side View of the Vehicle Repair Workshop



VP13: East Side View of the Vehicle Repair Workshop



GROUND FLOOR PLAN