

## **Annex A**

### **Response-to-Comments Table for Comments Received from Antiquities and Monuments Office on 25 October 2023**



Application for Amendment of Plan under Section 12A of the Town Planning Ordinance – Proposed Rezoning of the Application Site from “Green Belt” to “Residential (Group C)1” at Various Lots in D.D. 244 and Adjoining Government Land, Nam Pin Wai, Sai Kung, New Territories  
Responses to Comments

**Comments from Related Departments**

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COMMENTS FROM RELATED DEPARTMENTS

No.	Comments	Responses
1.	<p><b>Antiquities and Monuments Office, dated 25 October 2023</b></p> <p>The comment of the Antiquities and Monuments Office (“AMO”) from the heritage conservation perspective is as follows, please.</p> <p>Planning Statement</p> <p>1) The majority of the Application Site falls within Ho Chung Site of Archaeological Interest (“SAI”) and any proposed development within it will pose direct impact on it. Please review how the mitigation measures proposed could minimize the impact on archaeology and revise relevant sections where appropriate.</p> <p>2) Please indicate clearly the Application Site and the development site on Diagram 4.1.</p> <p>Archaeological Review Report</p> <p>General</p> <p>3) Please define clearly the Study Area, and illustrate accurately on the plans the Study Area, Application Site and Ho Chung SAI.</p> <p>Sections 1.1.1 and 1.1.2</p> <p>4) Please clarify if the two sections are referring to the same planning application and supplement the planning application number(s) for avoiding confusion when the project background is mentioned.</p> <p>Section 1.1.3</p>	<p>Noted. Please refer to Section 6.1 of the Archaeological Review Report in <b>Appendix F</b> of the Supporting Planning Statement for details of the proposed mitigation measures.</p> <p>Noted. Diagram 4.1 of the Supporting Planning Statement is revised.</p> <p>The Study Area is illustrated in Figure 1, composed of Phase 1, Access Road and Remaining Phase.</p> <p>The Application Site is illustrated in Figure 17 as Recommended Archaeological Survey-Cum-Excavation Area.</p> <p>Ho Chung SAI is illustrated in Figure 2.</p> <p>Please refer to the Archaeological Review Report in <b>Appendix F</b> of the Supporting Planning Statement for details.</p> <p>Section 1 has been revised accordingly. Clarification has been made to tally with the current application under Section 12A.</p> <p>Please refer to the Archaeological Review Report in <b>Appendix F</b> of the Supporting Planning Statement for details.</p>

No.	Comments	Responses
	<p>5) Please indicate clearly the source of “Archaeological Investigations and Survey-cum-Excavation (AISE) Report”.</p> <p>Section 1.1.4 and Figure 1</p> <p>6) There is no “Zone A” in Figure 1. Please check and amend.</p> <p>Figure 15</p> <p>7) Please indicate the investigation areas of Pei Tau and Ho Chung that mentioned in Sections 3.3.8 and 3.3.9 respectively.</p> <p>8) Please indicate the investigation areas of Shui Hau and Tai Wo that mentioned in Section 3.3.10</p> <p>Section 4.1.1</p> <p>9) Please clarify and revise where appropriate if the “Remaining Phase” and “Ancillary Road” that are within the Application site were also included for field scanning, investigation and study.</p> <p>Section 4.2.8</p>	<p>Please refer to response to comment no. (4) from your Department above.</p> <p>Furthermore, reference to necessary archaeological reports is made in the subsequent Sections 3.3.19 to 3.3.25.</p> <p>Please refer to the Archaeological Review Report in <b>Appendix F</b> of the Supporting Planning Statement for details.</p> <p>Section 1 has been revised to clarify the Project Background. Figure 1 is revised accordingly. Please note that “Zone A” is no longer referred in Section 1.</p> <p>Please refer to the Archaeological Review Report in <b>Appendix F</b> of the Supporting Planning Statement for details.</p> <p>After further review, Sections 3.3.8 to 3.3.10 mention areas in the Archaeological Investigation Report in Ho Chung Valley of Sai Kung (HCV1999) are too far away from the Application Site. They have been deleted to avoid confusion.</p> <p>Section 3.3.6 is revised to clarify the use of HCV1999 report.</p> <p>Please refer to the Archaeological Review Report in <b>Appendix F</b> of the Supporting Planning Statement for details.</p> <p>Please refer to response to comment no. (7) from your Department above.</p> <p>Please refer to Section 4.2.12 and 4.2.13 of the Archaeological Review Report in <b>Appendix F</b> of the Supporting Planning Statement.</p>

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	<p>10) In this Section which discusses Zone 4, it is noted that Zone 3 is also mentioned, i.e. “Zone 3 is inaccessible due to the dense vegetation. Observing from the southern edge of Zone 3, the hilltop is gently sloping from the west downwards to the east based on the contour of the same species of tall grasses covering the area (Appendix B: Photos 4.1 to 4.3).” Please clarify which zone is the quote above referring to and revise as appropriate. It is important to check thoroughly the report to ensure accuracy as error of such would mislead us on the assessment of the report submitted by the consultant / contractor.</p> <p>Section 5.4.4</p> <p>11) Please provide reliable details and legible visuals of the “modern human activities” to support the claim that “the areas [Zone 4] might have been disturbed by modern human activities.”</p> <p>Sections 5.4.4 and 5.4.5</p> <p>12) It is noted in the report that the result of the SKNPW2015 archaeological investigation in the area to the west and southwest of Zones 4 and 5 respectively was quoted, where artefacts were discovered at the foot of the hill and considered as secondary deposit possibly transported by natural soil movement from the hilltop. However, it is also noted that the report says, “the archaeological potential in Zone 4 might be diminished due to possible soil movement” and “the archaeological potential in Zone 5 might existed.” Please elaborate why the assessment of the archaeological potential of the two zones are different.</p> <p>Section 6</p> <p>13) The report recommends an archaeological survey-cum-excavation at Zones 3 to 5</p>	<p>Noted.</p> <p>Section 5.4.4 and Section 5.4.5 revised. Please refer to the Archaeological Review Report in <b>Appendix F</b> of the Supporting Planning Statement for details.</p> <p>Based on the archaeological investigation of SKNPW2015, relatively significant findings were found at the foot of the hill, which were identified as secondary deposit. It infers that such deposit might have been located at the hilltop and had swept away by soil movement, probably landslide. In the meantime, the hilltop areas have been disturbed by modern constructions of warehouses and concrete roads. Hence, since the terrain condition for both Zone 4 and Zone 5 comprised of are different, the assessments of the archaeological potential of the two zones are different.</p> <p>The concerned sections have been revised accordingly. Please refer to the Archaeological Review Report in <b>Appendix F</b> of the Supporting Planning Statement for details.</p> <p>Section 6.1.1 is revised. Please refer to the Archaeological Review Report in <b>Appendix</b></p>

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	<p>before commencement of the proposed construction works. Please elaborate the principles and rationale for the proposed mitigation measures as the archaeological potential of the three zones are different.</p> <p>14) For Zone 3, the report concludes that the area is expected to have no archaeological potential, but an archaeological survey-cum-excavation is still recommended at its northern part, please provide justification.</p> <p>Section 7</p> <p>15) Please revise the conclusion according to AMO’s above comment where appropriate.</p>	<p><b>F</b> of the Supporting Planning Statement for details.</p> <p>Section 6.1.1 is revised. Please refer to the Archaeological Review Report in <b>Appendix F</b> of the Supporting Planning Statement for details.</p> <p>Section 7.1.6 and 7.1.9 are revised. Please refer to the Archaeological Review Report in <b>Appendix F</b> of the Supporting Planning Statement for details.</p>

(Last updated on 10 January 2024)

