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The Conservancy Association

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7th June 2011

Ms. Wong Sean Yee, Anissa
Director of Environmental Protection
Environmental Protection Department
Environmental Impact Assessment Ordinance Register Office

By Fax: 2147 0894

Dear Ms. Wong

RE: Comments on Proposed Residential Development East of Ping Kong, Sheung Shui Project Profile

The Conservancy Association (CA) would like to express our serious concern on the captioned project. CA worries if constructing 184 residential units in Ping Kong would cause direct disturbance on existing natural habitat.

1. Agricultural Land

Research¹ has indicated that agricultural land, both active and disused, would provide an important habitat for bird community so that protecting agricultural land should be on priority. It would be further justified by the presence of the Malayan Night Heron (*Gorsachius melanolophus*) which had been recorded breeding at Ping Kong and feeding around the AFCD Tai Lung experimental farm in adjacent². CA would thus urge for a comprehensive ecological assessment on agricultural land within the development site. More efforts should also be paid on behavioral studies on other uncommon species apart from Malayan Night Heron.

2. Tree

Very often the detailed tree survey report would be submitted in separate from EIA report, but such data would be important to evaluate justification of proposed tree treatment, especially tree felling in the project. From ETWB TCW No. 3/2006 - Tree Preservation, the following order of priority should be adopted for tree removal consideration: retain, transplant on-site, transplant off-site, and fell. We strongly urge that the detailed tree survey report should be attached in EIA report for public access to clearly evaluate if such hierarchy for tree removal have been strongly adhered to.

¹ Leven M.R. (1998). Special Feature – Focus on Farmlands, *Porcupine!*. No. 18, Newsletter of Ecology & Biodiversity: The School of Biological Sciences. The University of Hong Kong.

² Allcock J.A. (2009). Farmland Birds. *Ecology of the birds in Hong Kong*. Hong Kong: Kadoorie Farm & Botanic Garden.

CA would particularly require the project proponent to note on ecological linkage between mature woodland and agricultural land within the development site, other than conducting detailed plant and vegetation survey. We regarded that the proposed development would result in habitat fragmentation so that more effort on assessing potential ecological linkage in the site would be necessary.

Regarding to tree compensation, if any, the general principle of compensating ecological function of habitat loss should be upheld. Compensatory planting of trees in terms of quantity only, with trees scattering along roadsides, would not re-create an equivalent ecological value of a habitat suggested in EIAO Guidance Notes (GN 6/2010).

Yours sincerely,
Ng Hei Man
Senior Campaign Officer