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The Conservancy Association

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2nd February 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 Hung Shui Kiu New Development Area (NDA) Project Profile

The Conservancy Association (CA) would like to submit comments on project profile regarding Hung Shui Kiu NDA.

1. Concern on area of conservation interest

Recent news report has disclosed that some plots of agricultural land zoned “Green Belt” near Tin Sam Village were subjected to fly-tipping. CA was seriously concerned if it acted as a prologue of “destroy first, develop later” in Hung Shui Kiu and then threaten existing areas of high conservation value. CA would require for careful assessment on these areas during planning stage of the project.

The destroyed farm plots, according to the previous Planning and Development Study on North West New Territories, were suggested to become a district open space, but it would also ruin local agricultural practice and ecological environment. In broader context, the space from Tin Sam Village to Nai Wai near hillside in Yuen Tau Shan is now a mix of village house and agricultural land. The above areas should be conserved intact to buffer town centre in future, rather than permitting considerable forms of urban encroachment or public facilities at the expense of the locals.

2. Concern on existing farmland

Indeed, together with Tuen Mun, Tin Shui Wai and Yuen Long, Hung Shui Kiu NDA would form a huge suburban area and lay a foundation for Community Support Agriculture which would facilitate consumers to buy local seasonal farm produce directly from local farmer. Apart from conserving indigenous social network, it would then offer an alternative to farmland but not turning them into another comprehensive development area again.

Very often farmland is considered to be low ecological value due to high degree of human disturbance. Yet such perception usually bases on limited understanding on

ecological baseline. Researches¹² have indicated that different bird community would use various types of farmland, both active and inactive, as their breeding and feeding ground. CA reminds that the ecological value of farmland should not be under-estimated during conducting ecological impact assessment. Feasible mitigation and compensation on loss of farmland should be the last resort with justification.

3. 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.

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
Campaign Officer

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.