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The Conservancy Association

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Incorporated in Hong Kong with limited liability by guarantee)

6<sup>th</sup> September 2017

Mr. Tong Chi Keung, Donald

Director of Environmental Protection

Environmental Protection Department

Environmental Impact Assessment Ordinance Register Office

By E-mail: eiaocoment@epd.gov.hk

Dear Mr. Tong,

RE: Comment on Housing Sites in Yuen Long South EIA Report

The Conservancy Association (CA) would like to express comments on the captioned EIA report.

### **1. Impact of Road D1 on agricultural land in Shan Ha Tsuen**

The latest Recommended Outline Development Plan (RODP) has realigned Road D1 (Figure 1) and then caused fragmentation of the agricultural land at Shan Ha Tsuen. The EIA report stated that measures have been adopted to minimize ecological impact, such as adjusting the road to the eastern limit of the agricultural land, reducing width of footpath and amenity area<sup>1</sup>. CA worries that it would not only result in direct loss of wet and dry agricultural land, but also change the hydrology, and even ecological condition of the entire agricultural area. However, alternatives of the road alignment and design have not been assessed and we wonder if fragmentation of the agricultural land can be further minimized or even avoided.

We wish to highlight that “preserving active agricultural land” is one of the guiding principles of the Planning and Engineering Study for Housing Sites in Yuen Long South. Both dry and wet agricultural land in Shan Ha Tsuen, according to the EIA

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<sup>1</sup> Please refer to Section 8.6.2.1 of the EIA Report

report, are evaluated as moderate ecological value. Protecting this piece of agricultural land in Shan Ha Tsuen is thus well justified. As such size of agricultural land with low degree of fragmentation is rarely seen in Hong Kong, we opine that it should be protected with greatest effort.

## **2. Impact of the proposed OU(Hillside River Corridor with Scenic Cycle Track)**

For the proposed OU(Hillside River Corridor with Scenic Cycle Track), a scenic cycle track will be built alongside the drainage channel<sup>2</sup> which is a mitigation measure for the cumulative loss of watercourses due to the development project. However, the EIA report does not show the design of the scenic cycle track, particularly its exact alignment and width. A standard cycle track will have its width of 4m in maximum<sup>3</sup>, and with the provision of footpath, greening or associated amenity area on both side, it would finally need an addition of 11m space for the work. Thus we are doubtful if it will pose disturbance to the drainage channel and secondary loss of its ecological function in both construction and operation phase.

Section 2 and 3 of the EIA report use the term “drainage channel” to define the new mitigation measure for water storage and normal drainage function as well as providing an opportunity for ecological enhancement. Section 8, however, uses the term “watercourse”. We assume that both are referring to the same item but clarification is necessary.

## **3. Impact on ardeids in Tai Tong (Pak Sha Tsuen) egretty**

We notice that DO zones are designated to protect the flight lines of the ardeids to the north and northwest. However, we are doubtful if the development intensity of the adjacent R2c zones would still pose disturbance to ardeids and affect ecological linkage between the egretty and foraging ground, as information such as plot ratio and building height is lacking. It is hard to justify if the current arrangement is the best solution to avoid or minimize potential impact on ardeids.

The egretty in Tai Tong (Pak Sha Tsuen) is newly discovered in 2014, with 30 nests recorded in 2016 and is the second largest colony for Cattle Egret in Hong Kong. It should be regarded as an area of high conservation importance, but it is now zoned as “Undetermined” and “Residential (C)”.

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<sup>2</sup> Please refer to Section 2.4.11.2 of the EIA Report

<sup>3</sup> Please refer to Section 6.3.1, Chapter 8: Internal Transport Facilities, Hong Kong Planning Standards and Guidelines

[http://www.pland.gov.hk/pland\\_tc/tech\\_doc/hkpsg/full/ch8/ch8\\_text.htm#6](http://www.pland.gov.hk/pland_tc/tech_doc/hkpsg/full/ch8/ch8_text.htm#6)

With its proximity to the development area, we strongly recommend that the government should initiative to zone the egrettry and its nearby to conservation zoning(s), should as Green Belt (1) or “Conservation Area”. This is to highlight conservation as the main planning intention and to avoid false hope from private landowners that the area can be used for development.

Yours sincerely,

Ng Hei Man

Campaign Manager

Figure 1 RODPs in the previous 2 stages of public consultation reveals that the alignment of Road D1 (circled in red) lies at the eastern periphery of the agricultural land (AGR zone) in Shan Ha Tsuen. The current alignment would cut the AGR zone and cause fragmentation of the agricultural land.

