



長春社 Since1968

The Conservancy Association

會址: 香港新界葵涌貨櫃碼頭路 77-81 號 Magnet Place 一期十三樓 1305-6 室 電話 Tel.:(852)2728 6781 傳真 Fax.:(852)2728 5538
Add.: Units 1305-6, 13/F, Tower 1, Magnet Place, 77-81 Container Port Road, 電子郵件 E-mail:cahk@cahk.org.hk
Kwai Chung, New Territories, H.K.
網址 Website:www.cahk.org.hk

3rd June 2021

Ms. Cheng Mei Sze, Maisie, JP
Director of Environmental Protection
Environmental Protection Department
Environmental Impact Assessment Ordinance Register Office

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

Dear Ms. Cheng,

RE: Comments on San Tin/Lok Ma Chau Development Node Project Profile

The Conservancy Association (CA) would like to express our concern on the captioned.

1. Impact on trees and woodland

If comparing the past habitat map¹ (Figure 1) with the preliminary outline development plan of San Tin/Lok Ma Chau Potential Development Area², some proposed development use would encroach existing secondary woodland and plantation. Although conditions of these wooded clusters have to be further evaluated during the EIA process, we are doubtful if the current land use is the most appropriate option in avoiding woodland loss. Provision of tree compensatory proposal, to a certain extent, would help preserve individuals but may not re-create an equivalent ecological value and integrity of a habitat.

CA would suggest the following:

- i. The project proponent should further explore ways to avoid/minimize direct loss on the above habitat and all other ecologically sensitive wooded areas in both construction and operation phase.

¹ Please refer to Figure 4.9.1 of Preliminary Feasibility Study on Developing The New Territories North https://www.pland.gov.hk/pland_en/p_study/comp_s/ntn_study/ntn_fr.pdf

² Please refer to the Preliminary Outline Development Plan of San Tin/Lok Ma Chau Development Node https://www.districtcouncils.gov.hk/yl/doc/2020_2023/en/committee_meetings_doc/htpdc/19912/htpdc_2021_012_annex2.pdf



- ii. Detailed tree survey report should be attached in EIA report.

2. Impact on agriculture

Similarly, some proposed development use would encroach active agricultural land and abandoned land with good potential for farm rehabilitation. As the agricultural land in the study area is generally in low degree of fragmentation, we hope that the project proponent should protect them with the greatest effort.

While a section “Agriculture and Fisheries” is now included in this EIA report, we would expect that the following items should be covered:

- i. Temporary and permanent loss of agricultural land
- ii. Soil degradation, such as soil contamination, disturbance on topsoil and subsoil
- iii. Changes/disruption to existing hydrological condition and irrigation system
- iv. Alternative land use configuration/design to avoid and minimize impacts on, for example, fragmentation of agricultural land, temporary and permanent loss of agricultural land, increase in non-agricultural uses, water quality etc., during construction and operation phase
- v. Measures to avoid and minimize disturbance on soil for cultivation

3. Impact on cultural heritage

A territory-wide survey of historical buildings³ has recorded 8,803 buildings and items and about 1,000 items have been studied in more details afterwards. The remaining items, though not graded or studied in details, have raised public awareness recently due to their historical importance. We note that that some of the items within the development site are also included in this list.

To ensure proper protection of all cultural resources in the project site, we hope that the following items should be included:

- i. The territory-wide survey of historical buildings should be considered in the desktop research stage of the cultural impact assessment.
- ii. Direct and indirect impacts on these heritage items should be identified.
- iii. Alternatives should be further explored to avoid/minimize direct loss on the above

³ Please refer to List of Territory-wide Survey of Historical Buildings
https://drive.google.com/file/d/12v2LhkRhEAOUyw191_J54wIRqj6BzjKx/view?fbclid=IwAR2X4WFuzlJunYS2sIqn21aIAygtw_rwqv1gHT--X532YQXnWONLkXyslmQ



長春社 Since1968

The Conservancy Association

會址：香港新界葵涌貨櫃碼頭路 77-81 號 Magnet Place 一期十三樓 1305-6 室 電話 Tel.:(852)2728 6781 傳真 Fax.:(852)2728 5538
Add.: Units 1305-6, 13/F, Tower 1, Magnet Place, 77-81 Container Port Road, Kwai Chung, New Territories, H.K. 電子郵件 E-mail:cahk@cahk.org.hk
網址 Website:www.cahk.org.hk

heritage items in both construction and operation phase.

4. Disposal of construction and demolition (C&D) waste

In the past few years, we have frequently spotted illegal dumping of C&D waste in agricultural land and fish pond within and adjacent to the project site. If C&D waste is not properly managed in this project, such activities would be more frequent and the environment in the adjacent Wetland Buffer Area (WBA) and even Wetland Conservation Area (WCA) would be further worsened.

We hope that the project proponent should propose stringent control and monitoring measures on the construction vehicles/dump trucks to prevent any construction waste dumping on ecologically sensitive area within and adjacent to the project site . For example, construction vehicles/dump trucks should be equipped with GPS devices. Specific transport route should be designated for construction vehicles/dump trucks to ensure proper waste disposal. Implementation of such measures and associated penalties shall be included in the contract terms to effectively control the activities of relevant contractors.

Yours sincerely,

Ng Hei Man

Campaign Manager

The Conservancy Association



長春社 Since 1968

The Conservancy Association

會址: 香港新界葵涌貨櫃碼頭路 77-81 號 Magnet Place 一期十三樓 1305-6 室 電話 Tel.:(852)2728 6781 傳真 Fax.:(852)2728 5538
 Add.: Units 1305-6, 13/F, Tower 1, Magnet Place, 77-81 Container Port Road, Kwai Chung, New Territories, H.K. 電子郵件 E-mail:cahk@cahk.org.hk
 網址 Website:www.cahk.org.hk

Figure 1 Some secondary woodland and plantation (circled in red) can be spotted in the project site

