

11 June 2019

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

By e-mail: [eiaocomment@epd.gov.hk](mailto:eiaocomment@epd.gov.hk)

Dear Ms. Cheng,

**RE: Comment on “Technical Study on Partial Development of  
Fanling Golf Course Site - Feasibility Study” Project Profile**

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

**1. Potential Egretry or Night Roost Site**

Since there is a considerable amount of mature trees within the project site, the area could be potential egretry or night roost for woodland and/or wetland dependent species. In case an egretry/ night roost has been “detected” and the project will be carried out in the proximity of an egretry/ night roost, the project proponent should assess the potential direct and indirect impacts on ecology, as well as to formulate appropriate mitigation measures to avoid or minimize potential impacts. For instance, project proponent should avoid operation and construction during breeding months and provide a buffer area between egretry/ night roost and construction site area.

**2. Tree Assessment Report**

From the Project Profile 3.9.1, “*The cluster of trees in the PDA, which are landscape, fairway and woodland with many trees considered as potential Old and Valuable Trees (OVTs), symbolizes the long history of FGC development since year 1911*”. According to “Register of Old and Valuable Trees”, registration for OVTs is based on **one or more of these criteria** – tree of large size; tree of precious or rare species; tree of particularly old age; tree of cultural, historical or memorable significance, and trees of outstanding form. We suggest that the project proponent should provide detailed justification on explaining why the trees could be considered as potential OVTs with reference to the Register.

From the Project Profile 3.9.2, “*Potential OVTs (including trees with a DBH over 1000mm) and protected species in Hong Kong in accordance with the “Rare and Precious Plants of Hong*

*Kong” possess significant amenity value. The survival rate of potential OVTs after transplanting is low due to their maturity”.* As mentioned previously, maturity is the not only criterion for the registration of OVTs. What is more is that there may not necessarily be a direct relationship between the survival rate of transplantation and the status of the tree. We hope that the project proponent could include tree assessment report with details on tree compensation and/or transplantation.

### **3. Comprehensive Planning Proposal**

While the Fanling Golf Course has existing recreation, historic or landscape value, there is an increasing demand for public housings. For a better site utilization, the government should consider adopting the “full development” plan of Fanling Golf Course. A “full development” does not necessarily mean building high-rise buildings in every hectare of the Golf Course. A “full development” could be a more comprehensive planning based on the Fanling Golf Course site as a whole, and could serve different purposes, including residential, commercial, recreation and conservation use. Therefore, we suggest project proponent revising or extending the scope of the study.

Yours sincerely,

Ng Hei Man

Campaign Manager

The Conservancy Association