



**長春社** since 1968

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The Conservancy Association

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Town Planning Board  
15/F North Point Government Offices  
333 Java Road  
North Point  
Hong Kong

By e-mail: [tpbpd@pland.gov.hk](mailto:tpbpd@pland.gov.hk)

Dear Sir/Madam

Re: Comments on the Section 16 Application No. A/NE-KTS/390

The Conservancy Association (CA) OBJECTS to the captioned Section 16 Application.

### **1. Adverse impact on agriculture**

This development proposal is located within the “Agriculture” (AGR) zone. The planning intention of AGR zone is to safeguard and retain good quality agriculture land. CA reiterated that it should be strongly upheld.

We are in extreme worries that the proposed road widening work and the new road section would contribute to direct loss of agricultural land, both active and disused (Figure 1), in the subject site. The former work will encroach at least 2 Accredited Farms right next to current Tsiu Keng Road, while the latter one even divides the entire agricultural area into 2 parts and causes serious farm fragmentation. Some irrigation ditches can also be spotted along the road but definitely it will be covered and replaced by cement. Such impact on agriculture would not be confined within site boundary but the entire agricultural area. However, all primary and secondary and cumulative impacts on agricultural development in the subject site have not been addressed and ignored.

## **2. Contradictory with rehabilitation program under North-east New Territories New Development Areas (NENT NDA)**

The importance of Kwu Tung South in agriculture is further highlighted with reference to the revised proposal of NENT NDA. Kwu Tung South is identified as areas suitable for agricultural rehabilitation (Figure 2) so that the affected farmers could re-establish their farming practices. The captioned planning application would encroach land suitable for farming and greatly deviate guiding principle of NENT NDA study.

## **3. Ecological assessment**

We have great reservation in the ecological assessment as it was poorly conducted:

### **i. Buffer for the stream**

It was noted that a buffer distance of 7.5m was set for the stream. However, it cannot justify why a mere 7.5m would be sufficient to prevent any disturbance to stream course in both construction and operation phase.

### **ii. Habitat map**

No habitat maps have been provided. It seems that stream course is the only habitat identified in the ecological assessment. Farmland, both abandoned and active, as well as, dry and wet, were absent from the survey, not to say some others such as woodland, orchard, and so on.

Without a detailed understanding on the existing ecological conditions of the assessment area which is not confined to the development site only, it would not be well-justified to conclude that the development would cause no significant ecological impacts to the subject site.

### **iii. Survey time**

We notice that all the surveys were conducted in dry seasons only and cannot reflect entirely the ecological condition of the site. Only one species can be recorded in the dragonflies and damselflies survey but activities of dragonflies and damselflies would be more frequent in wet season. The survey is highly not representative and should be conducted again.

### **iv. Identification of impacts**

The part of "Identification of impact" largely missed out various potential impacts in both construction and operation phase. The below are some of the items we are initially concerned about:

- Habitat loss
- Hydrological change
- Surface water sedimentation and contamination: pollution control measure by adopting

good site practice is a basic requirement and give no helps to impacts in operation phase

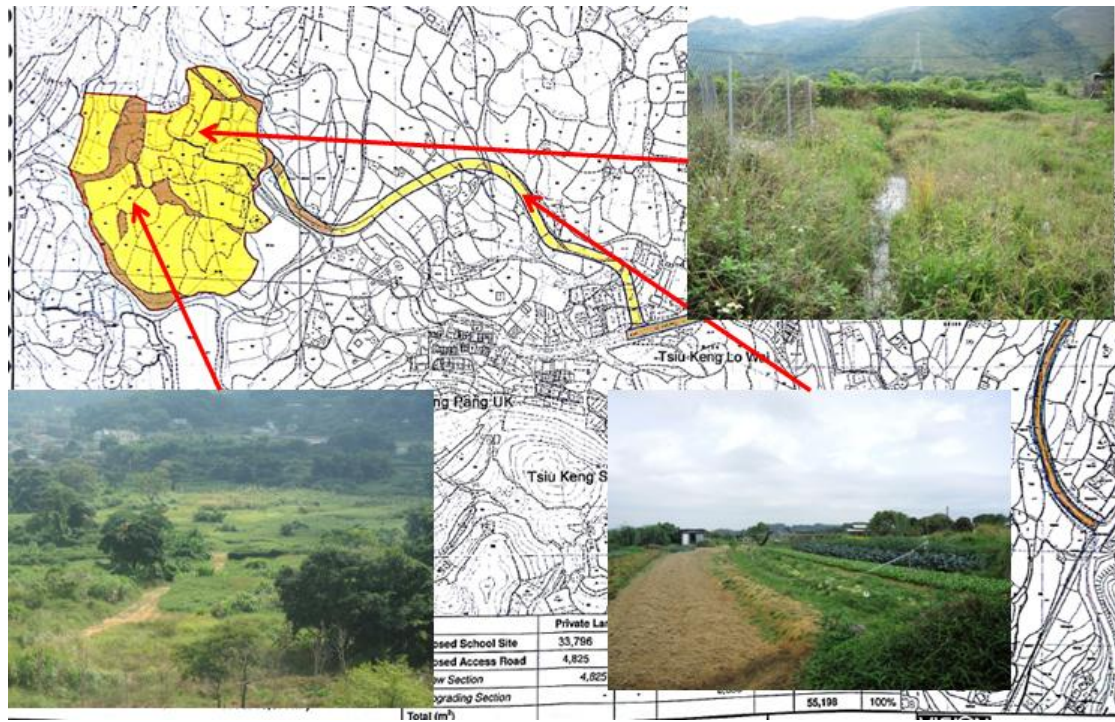
- Sewage discharge
- Impact to fireflies
- Visual incompatibility

Yours faithfully

Ng Hei Man

Assistant Campaign Manager

**Figure 1** Agricultural land, both active and disused, would be affected by the proposed development



**Figure 2** Kwu Tung South is identified as areas suitable for agricultural rehabilitation (Extracted from Information Digest of Revised Development Proposals of NENT NDA. Please refer to: [http://www.nentnda.gov.hk/doc/pe/info\\_digest.pdf](http://www.nentnda.gov.hk/doc/pe/info_digest.pdf)). The proposed development (marked in purple) would lie within the identified farm rehabilitation area.

