



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

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19th January 2021

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

By e-mail: tpbpd@pland.gov.hk

Dear Sir/Madam,

RE: Comments on the Section 16 Application No. A/NE-FTA/201

The Conservancy Association (CA) OBJECTS to the captioned application.

1. Not in line with the planning intention of Agriculture (AGR) zone

According to Fu Tei Au and Sha Ling Outline Zoning Plan No. S/NE-FTA/16, the planning intention of AGR zone is “*intended primarily to retain and safeguard good quality agricultural land/farm/fish ponds for agricultural purposes. It is also intended to retain fallow arable land with good potential for rehabilitation for cultivation and other agricultural purposes*”. From the aerial photos in Environmental Assessment Report, the subject site comprised large area of active agricultural land. We opine that the site still has high potential for agricultural rehabilitation. The proposed development is not in line with the intention to retain land with good potential for rehabilitation.

2. Adverse ecological impacts

Abandoned agricultural land would become seasonally wet and offer a range of opportunities for wetland-associated and aquatic fauna. Previous studies¹ have revealed that Greater painted-snipe was once recorded in agricultural land in Sha Ling. This is a rare and localised breeding species in Hong Kong² such that any breeding sites is of

¹ Ove Arup (2016), Site Formation and Associated Infrastructural Works for Development of Columbarium, Crematorium and Related Facilities at Sandy Ridge Cemetery – Design and Construction, Final Environmental Impact Assessment Report.

² Carey G.J., Chalmers M.L., Diskin D.A., Kennerley P.R., Leader P.J., Leven M.R., Lewthwaite R.W.,



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conservation importance. Since similar habitat can be spotted in the subject site, we worry that direct loss of agricultural land would also pose adverse ecological impact on Greater painted-snipe, and other wetland-associated species.

We are also very disappointed that the ecological impact assessment (EcoIA) fails to take account of off-site ecological impacts. For example, a watercourse is running from the subject site to the AGR zone south of Lo Wu Road (Figure 1). Although land filling activities have been observed in that area few years ago, we note from the aerial photo that the area comprise fish pond, dry and wet agricultural land (Figure 2) which might still be of considerable ecological value. Since there would be direct loss of this watercourse, we worry that it would also disturb fish pond and agricultural land in the area.

Meanwhile, another watercourse is found very close to the northwest boundary of the subject site. Likewise, the EcoIA gives no attempts in evaluating any potential disturbance on the watercourse. Indeed this watercourse would eventually connect to the lower part of the watercourse within the site (Figure 3), and then down to the AGR zone in the south of Lo Wu Road. Even though this watercourse lies outside the subject site, potential ecological impact on this watercourse should not be ignored.

3. Undesirable precedent for similar applications

The proposed maximum depth of land filling is 1.94m, but there is no similar applications for such large scale of land filling approved in the adjacent AGR zone. Moreover, although the proposed development is claimed to be temporary in nature, it is anticipated that extensive paving is necessary. It is highly questionable if the site can be reinstated to original status which is suitable for farm rehabilitation in future. In this way, approving the application would set an undesirable precedent for similar applications within “AGR” zone.

Yours faithfully,

Ng Hei Man

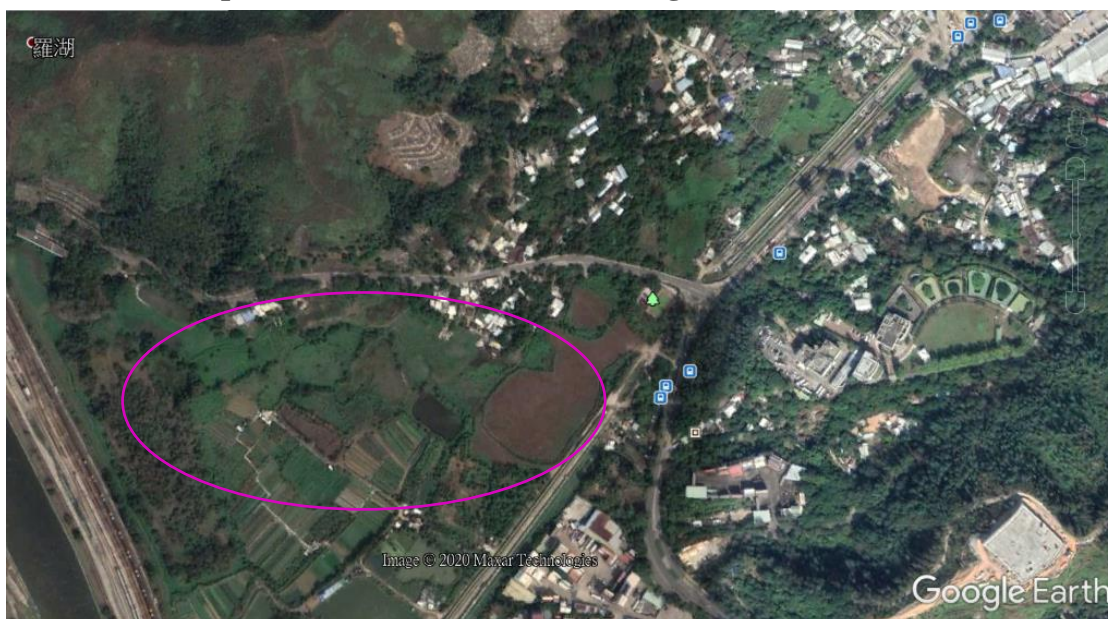
Campaign Manager

The Conservancy Association

Figure 1 A watercourse (marked in light blue) is running from the subject site (marked in red) to the AGR zone in the south of Lo Wu Road



Figure 2 From the aerial photo, mosaic of fish pond, dry and wet agricultural land (circled in pink) can be found (Source: Google Earth)





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Figure 3 Another watercourse (marked in light blue) is found very close to the northwest boundary of the subject site and would eventually connect to the lower part of the watercourse (marked in dark blue) within the site

