



長春社 Since1968

The Conservancy Association

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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 Penfold Park Enhancement Project Profile

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

1. Tree management

In terms of updated arboricultural standard, trees in the study sites were not in good condition. Some trees were in poor structural conditions despite fair health conditions. Some trees were unnecessarily topped while some had pruning cuts poorly done (Figure 1-4). These have caused serious tree deformation and created weak structure on many trees. Topped trees had crown size much smaller than normal trees, and this would reduce the opportunity to offer habitat for wildlife.

Although new trees were proposed to replace those felled trees, tree conditions would still remain poor with the above inappropriate tree management. Apart from location, implementation programme, maintenance and management schedules, etc., proper pruning proposal should also be included in the compensatory planting proposal. Indeed proper pruning proposals would be submitted for the retained and transplanted tree according to the Project Profile, and such inclusion would further enhance proper implementation of landscape and visual mitigation, and ensure comprehensive tree management in future.

2. Open lawn

Lawn is the major habitat in Penfold Park, and such large open lawn is rarely seen in urban parks in Hong Kong. Due to the captioned project, part of the open lawn would



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be replaced by not only Equine Experience Centre but also landscape enhancement work. From landscape and visual aspects, the area of lawn would be reduced and the overall landscape of Penfold Park would be altered. For example, the photomontage in Figure 3.1B of the Project Profile showed that new trees can be greatly dominated in the existing open lawn. The proposed landscape and visual mitigation measures in Figure 4.1 of the Project Profile even imply that the open lawn would be loss in large scale (Figure 5).

Some landscape enhancement measures, from ecological point of view, would create more diverse habitat for wildlife in future. While we agree that these measures (such as tree planting, butterfly garden, etc.) create opportunities for habitat enhancement, open lawn under proper management could serve similar function. More importantly, landscape and recreation value of the open lawn in Penfold Park should not be neglected. To balance function of various habitats in the site, there should be flexibility in maintaining certain proportion of open lawn in the landscape design proposal.

3. Pond relining work

From Section 1.2.3 and 3.1.6, we are still not sure how the three ponds would be after the proposed pond relining work. We would like the project proponent to clarify the details below:

- i. Since Section 3.1.6 of the Project Profile stated that “*the sloping outer edges of the pond will be cut to increase the pond storage capacity without affecting the total area of the pond*”, how the final sloping outer edges of the pond would be? Would it imply that the current gentle sloping be changed to vertical sloping which might not be ecologically friendly?
- ii. From our observation, the slope of the pond is now paved by masonry blocks and partly covered by waterproof materials. Would there be changes in those materials after the pond relining work?
- iii. Would there be changes in paving materials of the pond bed?
- iv. What would be the volume and area of the three ponds after the pond relining work?

We would suggest that the project proponent should provide cross section diagrams to



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demonstrate how pond relining works change the three existing ponds.

Thank you for your attention.

Yours sincerely,

Ng Hei Man

Campaign Manager

The Conservancy Association



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Figure 1-4 Some trees were unnecessarily topped while some had pruning cuts poorly done. These have caused serious tree deformation and created weak structure on many trees





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**Figure 5 The proposed landscape and visual mitigation measures, with many new trees planted in the site, seems to imply that the open lawn would be loss in large scale
(Source: Figure 4.1 of the Project Profile)**

