



長春社 Since1968

## The Conservancy Association

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10<sup>th</sup> 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](mailto:eiaocomment@epd.gov.hk)

Dear Ms. Cheng,

RE: Comments on Remaining Phase Development of the New Territories North (NTN) – NTN New Town and Man Kam To Project Profile

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

### **1. Impact on agriculture**

CA is highly concerned that the proposed tentative boundary of NTN New Town covers large area of active agricultural land and abandoned land with good potential for farm rehabilitation. Agricultural land in the site area, such as Tai Po Tin, Ha Shan Kai Wat, Chow Tin Tsuen, Lei Uk, Ping Che Yuen Ha, and so on, is generally in low degree of fragmentation (Figure 1 and 2). We hope that the project proponent should protect them with the greatest effort.

Regarding agricultural land in Heung Yuen Wai, Tourism/Leisure land use has once proposed according to the Preliminary Feasibility Study on Developing the New Territories North (The Study). Tourism/Leisure use has the following planning intention:

*“Tourism/ Leisure with a PR of 0.8 occupies about 12 ha of land at HYW PDA. The close location of the Tourism/ Leisure zone with the future Robins Nest Country Park would offer synergies. The good quality agricultural terrain, dispersed villages housing interesting traditional architecture further west and proximity to the proposed Country Park, marks the identity of the area. It is thus*



*proposed to maintain the rural significance of this area by defining zones for agro-tourism villages and eco-lodge type development that will increase employment opportunities and integrate with the scenic views to the south and west<sup>1</sup>”*

Viewing many examples of recreation farm in New Territories, it is quite common that recreation elements would over-ride agriculture. Associated impacts on agricultural land, such as land filling with cement and asphalt, construction of road access, car-park, can also be destructive to agricultural land. Without strict planning control and guideline, we worry that such condition would be continued in Heung Yuen Wai and also some other agricultural areas within the site area.

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

- i. Area of active and abandoned agricultural land
- ii. Temporary and permanent loss of agricultural land
- iii. Soil degradation, such as soil contamination, disturbance on topsoil and subsoil
- iv. Changes/disruption to existing hydrological condition and irrigation system
- v. Measures to protect agricultural land and prohibit non-agricultural use, such as Agricultural Priority Areas
- vi. 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
- vii. Measures to avoid and minimize disturbance on soil for cultivation

## **2. Legitimizing “Destroy first, build later”**

In recent years we have spotted many cases of land formation activities in the site area (Figure 3 and 4) such as land/pond filling, excavation, vegetation clearance. When we refer to the past broad land use plan, some of the sites would become development area such as industrial estate, agri-logistic/light industry, and so on.

We worry that such arrangement is merely legitimizing the practice of “destroy first,

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<sup>1</sup> Please refer to Section 3.7.50 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](https://www.pland.gov.hk/pland_en/p_study/comp_s/ntn_study/ntn_fr.pdf)



build later” and further encourage destruction in the site area, especially areas of high ecological importance. We opine that any attempts of “destroy first, build later” should not be given any sympathetic consideration to subsequent land use on the site concerned.

### 3. Impact on trees and woodland

If comparing the past habitat map with the broad land use plan<sup>2</sup>, 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 explore ways to avoid/minimize direct loss on the above habitat and all other ecologically sensitive wooded areas in both construction and operation phase.
- ii. Detailed tree survey report should be attached in EIA report.

### 4. Impact on all watercourses within the site area

From the proposed drainage system in the Study, many natural watercourses have been identified as potential conflicts with the development. Under such condition, quite often some ecologically friendly design would be proposed, such as vertical gabion wall, rip-raps, grasscrete, in those watercourses to ensure both drainage capacity and ecological conservation. However, it would then turn out to be an engineered channel without obvious surface flow and full of invasive species. A channel in Ping Che within the site area is a typical example to demonstrate how an ecologically-dead channel can be created after implementing various so-called ecologically friendly designs (Figure 5).

CA would suggest the following:

- i. The project proponent should explore ways to avoid/minimize disturbance (both

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<sup>2</sup> Please refer to the Figure 3.7.2c, 3.7.2d, 3.8.2c, 3.8.2d 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](https://www.pland.gov.hk/pland_en/p_study/comp_s/ntn_study/ntn_fr.pdf)



direct and indirect) on all watercourses, including their natural river banks, natural river bed, riparian zone, in both construction and operation phase.

- ii. The project proponent should liaise corresponding departments to critically evaluate all so-called river revitalization elements to ensure ecological connectivity

### 5. Impact on cultural heritage

A territory-wide survey of historical buildings<sup>3</sup> 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 heritage items in both construction and operation phase.

### 6. 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 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

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<sup>3</sup> Please refer to List of Territory-wide Survey of Historical Buildings  
[https://drive.google.com/file/d/12v2LhkRhEAOUyw191\\_J54wIRqj6BzjKx/view?fbclid=IwAR2X4WFuzlJunYS2sIqn21aIAyggwt\\_rwqv1gHT--X532YQXnWONLkXyslmQ](https://drive.google.com/file/d/12v2LhkRhEAOUyw191_J54wIRqj6BzjKx/view?fbclid=IwAR2X4WFuzlJunYS2sIqn21aIAyggwt_rwqv1gHT--X532YQXnWONLkXyslmQ)



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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

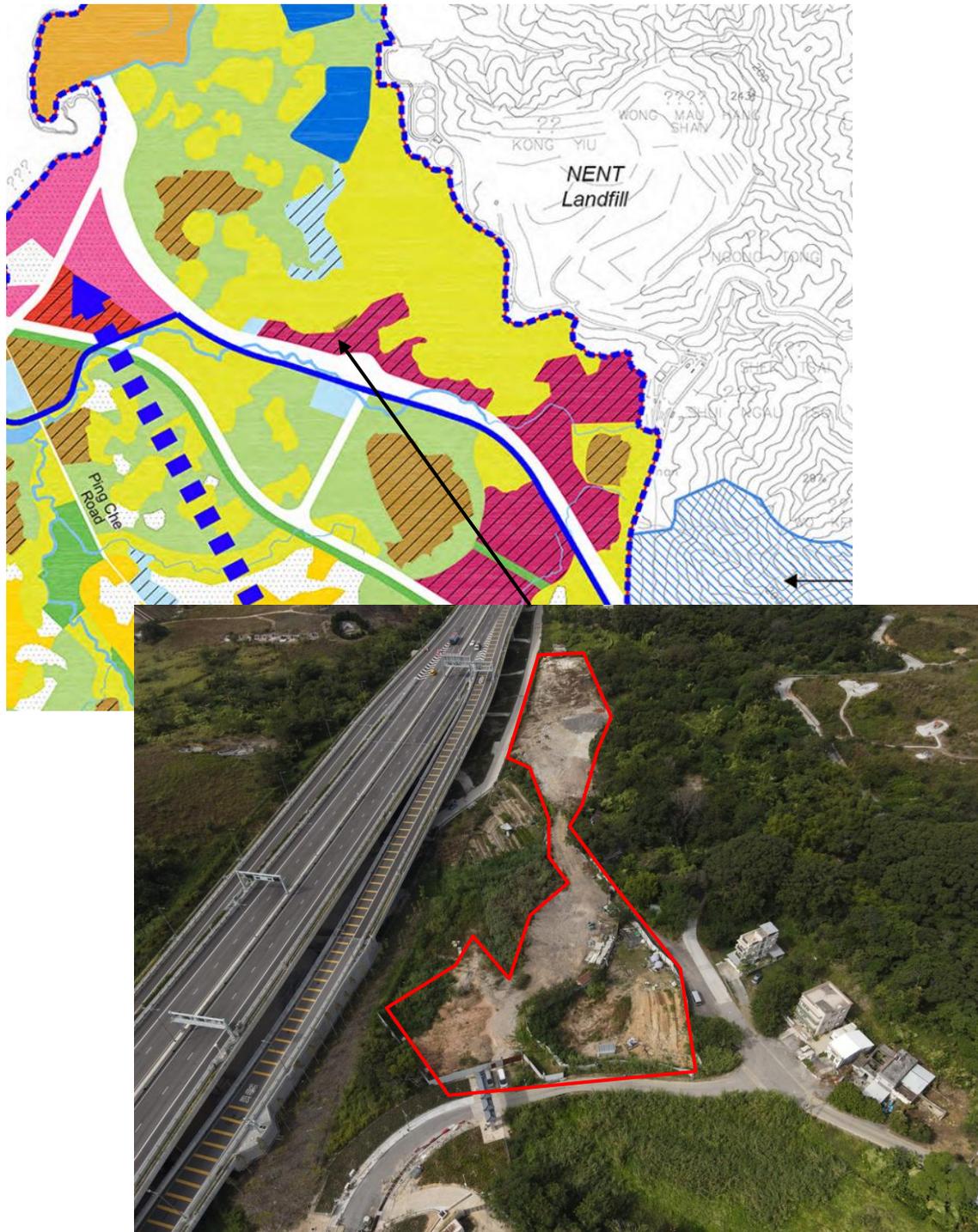
**Figure 1 and 2** Agricultural land in areas such as Tai Po Tin, Ha Shan Kai Wat, Chow Tin Tsuen, Lei Uk, Ping Che Yuen Ha, are generally active and in low degree of fragmentation (Source: Google Map)



**Figure X Land filling in Lo Wu Road. According to the Study, the site would be proposed for Agri-Logistic/Light Industry**



**Figure 4 Land filling near Heung Yuen Wai Highway (marked in red).  
According to the Study, the site would be proposed for Industrial Estate**



**Figure 5** Some so-called ecologically friendly designs have been included in a river course in Ping Che. The river course is now no difference from an engineered, ecologically-dead channel without obvious surface flow.

