

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-SLT/1

The Conservancy Association (CA) would like to express concerns on the captioned application. Particularly, further information should be included in the application to illustrate potential direct or indirect impacts during construction and operation phase.

1. Construction of nature trail

CA is writing to request additional information and elaborations on the following concerns:

- Transporting filling and paving materials for the proposed nature trail is anticipated during construction phase. In connection to this, the applicant should evaluate if such activities would cause disturbance on the subject site and its adjacent environment. In the case of potential disturbance, avoidance and mitigation measures should be proposed.
- All three proposed sections of the nature trail would involve new construction of pathway and encroachment of abandoned farmland (both dry and wet) in Green Belt (GB) and Conservation Area. Direct and indirect habitat loss, as well as potential habitat fragmentation should be evaluated and as far as possible to be avoided and mitigated.
- As all proposed sections of the nature trail are not connected, we are doubtful if there would be additional improvement work or extension of nature trail afterwards. Clarification is need on this by, for example, providing details on whole alignment of the nature trail (if any).
- While the application has mentioned that the nature trail would enable visitors to “*access different parts of the reserve on foot or by wheelchair easily*”, we wish to clarify if it has to follow “Universal Accessibility: Best Practices and Guidelines” prepared by Architectural Services Department¹. For example, according to the guideline, the width of a standard

¹ Architectural Services Department (2004). Universal Accessibility: Best Practices and Guidelines
https://www.archsd.gov.hk/archsd/html/ua-chinese/06_76.html

pavement for wheelchairs should not be less than 1,050mm. The width of 1,200mm would be better to allow adequate wheelchair turning space. Consequently, the proposed width (i.e. 1m according to the Project Layout Plan) might have to be adjusted, and the associated impacts might also need to be evaluated and as far as possible to be avoided and mitigated.

- Based on the Project Layout Plan, we are not sure how the alignment *“helps directing visitors away from areas that are too sensitive to human disturbance”*. More explanation on this statement is needed. For example, why the creation of new route, instead of upgrading existing footpath, is preferred in the final design; how the new section in GB which is completely isolated from existing footpath can serve the purpose of diverting visitors away from sensitive areas; any special arrangement is planned to manage visitor flow at the proposed nature trail, and so on.
- We cannot see other justifications of the proposed nature trail in the planning application except *“directing visitors away from areas that are too sensitive to human disturbance”*. More elaboration is needed to understand the actual need for this nature trail.

2. Construction of artificial marsh and eco-pond

- Given that there would be excavation work on abandoned farmland, potential direct and indirect impacts on abandoned farmland and the proposed impact avoidance and mitigation measures should be clearly stated in the application.
- Regarding *“regular removal of exotic plants, refuse and debris will be performed by bulldozer...”*, we are concerned about frequency of the use of bulldozers for such regular management practice in Sha Lo Tung; which part of management zone the bulldozer(s) would be used; and how the bulldozer(s) would be transported to Sha Lo Tung through the narrow rural footpath. Further clarification is needed to evaluate potential adverse impacts arise.
- The project proponent should provide details on how to treat the excavated materials.

3. Cumulative impact

We understand that ecological enhancement work would be conducted by AFCD in one of the sections of SSSI stream in Sha Lo Tung. Since the work schedule of both the enhancement work and the subject project are not clear, the project proponent might need to clarify potential cumulative impact could be resulted by other concurrent project(s).

In conclusion, we have to highlight that Sha Lo Tung ranks second according to 12 priority site for enhanced conservation under New Nature Conservation Policy. Even the proposed works in the application are associated with Management Agreement with the aim to rehabilitate

degraded ecosystem and promote public awareness on nature conservation, any works in such important ecological hotspot need good justification and careful assessment. We opine that the applicant has to seriously take the above concerns into consideration and evaluate if amendment of the application is necessary.

Yours faithfully,
Ng Hei Man
Campaign Manager

cc. Green Power
Designing Hong Kong
Kadoorie Farm and Botanic Garden
The Hong Kong Bird Watching Society
The Hong Kong Countryside Foundation
WWF-Hong Kong