



長春社 Since 1968

## The Conservancy Association

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Environmental Impact Assessment Ordinance Register Office  
Environmental Protection Department

By E-mail: [eiaocomment@epd.gov.hk](mailto:eiaocomment@epd.gov.hk)

Dear Sir/Madam,

Comment on Technical Study on Partial Development of Fanling Golf Course Site – Feasibility Study EIA Report

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

**1. Unclear mitigation and compensation due to direct loss of woodland/mixed woodland**

The proposed housing development in Sub-Area 1 would lead to direct loss of 0.39 hectares of woodland and 2.85 hectares of mixed woodland. Viewing the proposed layout plan of the proposed housing and road work, it seems that tree removal and vegetation clearance in large scale would be inevitable. While the EIA report claims that actual woodland loss in Sub-Area 1 would be minimized as far as practicable during design stage, we are still very concerned if the proposed development can be further adjusted to avoid/minimize direct loss of woodland/mixed woodland.

Particularly the following items should be taken into consideration:

- Fragmentation in Sub-Area 1 and Sub-Area 2

Although Section 9.7.2.7 mentions that the ecological corridor between Sub-Area 1 and Sub-Area 2 (i.e. “*from the wooded area at the southeast of Sub-Area 1, then crossing the centre and southwest part of Sub-Area 2*”) is “*rather limited as it ends at developed area to the east and discontinued at Fan Kam Road to the west*”. However, the mosaic of wooded and open habitats in Sub-Area 1 indeed form no physical barriers and allow certain degree of wildlife mobility between these habitats. It would be good for the project proponent (i.e. CEDD) to explore how the effect of fragmentation can be further minimized by preserving more trees in mixed woodland at the southern periphery of Sub-Area 1.



### - Green buffer in Sub-Area 1

Mixed woodland can also be spotted in the eastern and western part of Sub-Area 1 along Fan Kam Road and Ping Kong Road. While new trees are proposed as buffer planting according to the conceptual landscape and mitigation plan, we wonder if retention of existing trees and vegetation there can still achieve the same purpose to maintain a green buffer, and also avoid extensive clearance of mixed woodland.

### - Works in Sub-Area 2

The notional layout plan reveals that a 1-storey building and an associated vehicular access are proposed in Sub-Area 2 (Figure 1). Direct loss of mixed woodland and woodland would be resulted, but it seems that such condition has not been fully reflected in the EcoIA. Although Table 11.10 states that “*The exact layout of the proposed 1-storey building and the associated vehicle road shall be subjected to further review*”, such loss of woodland would be significant and this should be evaluated in this current stage. Identification of potential impact and possible mitigation measures, in particular, should be included in the EIA report.

Regarding woodland compensation, it is suggested that turfgrass of Sub-Area 2 and northern part of Sub-Area 3 would be recommended for woodland compensation. As usual, we have grave concern that existing mechanism which is claimed to meet the target of tree compensation. It might, to a certain extent, help preserve individual trees but would not re-create an equivalent ecological value and integrity of mixed woodland or woodland mentioned in the EIA report.

## **2. No information on secondary impacts due to the proposed woodland compensation**

Despite provision of mitigation/compensation measures, it seems that the following secondary impacts have not been clearly identified and evaluated:

- Impact on turfgrass
- Impact on species of conservation importance, especially those recorded in turfgrass in Sub-Area 2 and Sub-Area 3
- Hydrological disruption in habitats within Sub-Area 2 and Sub-Area 3

What we have to emphasize is that woodland compensation is necessary once direct loss of woodland is anticipated, but it is equally important to avoid/minimize additional



impact to the environment.

### 3. Inconsistent ecological findings between CEDD and Hong Kong Golf Course (HKGC)

With reference to Table 9.2 of the EcoIA and summary of key ecological findings by HKGC<sup>1</sup>, we note that some ecological findings between CEDD and HKGC are different. Here are some examples:

- According to the EIA report, only one bat species (Japanese Pipistrelle) was recorded from the Project Site. From the previous ecological survey by HKGC, however, 15 species of bats within the Project Site were recorded.
- According to the EIA report, a total number of 38 moths were recorded in the Project Site, of which only 1 species was of conservation concern. HKGC, however, recorded 453 moths within the Project Site, of which 34 species were of conservation concern.

As the above findings might, to a certain extent, affect the evaluation of particular habitats, and then contradict the conclusion made in the EIA report that all associated ecological impacts have been considered and assessed. It would be necessary to clarify such differences. For example, methodologies of both findings should be compared in the EIA report. Additional ecological information should be collate or provide to confirm ecological status of all habitats of Fanling Golf Course.

### 4. Concern on increasing light disturbance

We are doubtful if the problem of light disturbance has been fully identified and addressed in the EIA report. Particularly we have the following concerns:

- The proposed housing development in Sub-Area 1, with a population of 33,600, would be definitely a major light source at night. Surprisingly this has not been identified. No details are also available to assess potential light disturbance on Sub-Area 1 to 4.
- The proposed 12 high residential towers, with building height of 37-45 storeys, may also pose additional light disturbance to the remaining Fanling Golf Course in

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<sup>1</sup> Fanling Golf Course – Provision of Ecological Consultancy Services (2022-2023) – Summary of Key Ecological Findings  
[https://www.hkgolfclub.org/cms/wp-content/uploads/2022/06/Summary-of-Key-Ecological-Findings\\_finl-AEC.pdf](https://www.hkgolfclub.org/cms/wp-content/uploads/2022/06/Summary-of-Key-Ecological-Findings_finl-AEC.pdf)



the west of Fan Kam Road. However, such evaluation is not available in the EcoIA.

- It is assumed that ancillary facilities would be provided to facilitate recreation activities in Sub-Area 2 to 4. We are concerned if additional source of light would be induced. This should be further clarified in the EIA report.
- Table 9.25 mentions that Road Improvement Works at Fan Lam Road would be “over 1km from Sub-Area 1”. Even so, this could be regarded as another light source and may lie more close to Sub-Area 2 to 4. However, merely a vague conclusion is made and no further information are available to evaluate how such cumulative light pollution can be mitigated.
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#### **5. Unclear identification and evaluation of impacts by the proposed OU (Recreation cum Conservation Area)**

Sub-Area 2 to 4 would be zoned OU (Recreation cum Conservation Area). The EIA mentions some land uses/works/management plan would be proposed there:

*“Recreational and ancillary facilities with minimal new structure/change to existing site conditions to support the recreation activity will primarily be provided in Sub-Area 2. Landscaping works including but not limited to planting and transplanting works that are compatible with existing habitats are also anticipated within the Sub-Areas 2 to 3. For Sub-Area 4, no works is anticipated in order to preserve its ecology. Subject to further investigation, the actual land use will be further confirmed and a proper management plan with management approach including establishment of conservation area will also be formulated to preserve the existing valuable habits.” (Section 2.9.1)*

*“It is anticipated that only recreational facilities and ancillary facilities will be provided, while no works is proposed in Sub-Area 4.” (Section 9.7.2.5)*

*“Hence, Sub-Area 2 to Sub-Area 4 should be conserved and a management plan will be formulated with the aims to manage the human activities conducted in Sub-Area 2 to Sub-Area 4 and conserve the ecologically sensitive habitats and species of conservation importance from disturbance.” (Section 9.8.3.6)*

*“In Sub-area 2, a 1-storey building may possibly be provided nearby the*



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*existing pumping station for Sub-areas 2 to 4 for future use. Since the proposed public housing development in Sub-area 2 is subject to confirmation ...*  
(Section 11.4.4)

*“... primary intention is to conserve the existing natural landscape and ecological features, to provide space for recreational and ancillary facilities with minimal new structure/change to existing site conditions, serving the needs of the general public. No works would be carried out in Sub-area 4 (subject to further design development).”* (Section 11.9.4)

Section 9.7.2.5 concludes that “*Direct impacts to habitats in Sub-Area 2 to 4 will be very limited*”. However, viewing that there are very limited details on the above land uses and works, it would be not justified to come up with such conclusion in this stage. Likewise, since management plan lacks details, it would be difficult to evaluate if the management plan in future would ensure proper conservation of existing habitats and species of conservation importance in Sub-Area 2 to 4.

Worse still, from Section 2.9.2, various recreation uses, such as “Eating Place”, “Holiday Camp”, “Place of Entertainment”, “Place of Recreation, Sports or Culture”, would be in Column 2 under the proposed OU zone (Recreation cum Conservation). That means these recreation uses could obtain planning permission from Town Planning Board. We worry that approving these recreation uses would even over-ride the purpose to achieve the purpose of conservation in the site. Again, the EIA report does not elaborate much on potential disturbance brought by recreation activities.

In short, supplementary information on this OU zone (Recreation cum Conservation) is vitally necessary to identify and evaluate potential ecological impacts during construction and operation phase.

Yours faithfully,

Ng Hei Man

Campaign Manager

The Conservancy Association

