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The Conservancy Association

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13th January 2023

Mr Lam Sai Hung, GBS, JP
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Transport and Logistics Bureau
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Mr Tse Chin Wan, BBS, JP
Secretary for Environment and Ecology
Environment and Ecology Bureau
By email: see@eeb.gov.hk

Dear Mr Lam and Mr Tse,

Objection to PWP Item No. 7471RO The Establishment of an Agricultural Park in Kwu Tung South (Phase 2) – Road Works

In view of the current information available, The Conservancy Association (CA) would NOT support the captioned work. Details on the Agricultural Park (Agri-Park) (Phase 2) are still very limited so that it is difficult to assess if the proposed alignment is well-justified, and effective to agricultural development.

1. Insufficient information on the positioning of Agri-Park

According to the copy of the Engineering Feasibility Study for the Establishment of an Agricultural Park – Feasibility Study (The Feasibility Study), initially the proposed main road would pass through 3 major regions, namely Region A, B and C¹, and would be planned for traditional, greenhouse and organic farming² respectively. Comparing with the latest information in the meeting of Northern District Council dated 14th June 2022³, the above 3 regions have not been mentioned again. Preliminary details such as numbers and scale of farms are also missing. Regarding planning of ancillary facilities,

¹ Section 3.7.4 of the Engineering Feasibility Study for the Establishment of an Agricultural Park – Feasibility Study (The Feasibility Study)

² Table 6.5 of The Feasibility Study

³ 北區區議會文件第 12/2022 號 – 在古洞南設立農業園第二期的發展計劃

https://www.districtcouncils.gov.hk/north/doc/2020_2023/tc/dc_meetings_doc/21781/n_2022_012_ch.pdf



such as parking area, lodging and storage units, composting plants, and so on, while the report stated that those facilities “*would be easily accessible if they are located beside Tsiu Keng Road or the main access road*”⁴, there are insufficient information to justify this and, more importantly, how the proposed alignment brings synergy to ancillary facilities as well as agricultural area in adjacent.

2. Alternatives not been explored

During the discussion of Phase 1, many groups often expressed grave concern on large scale of both permanent and temporary access. The reality was that the main access remained very large in scale. No information is available to explain whether there are other alternatives of road alignment and design, or why the current proposal is the most preferable to fulfill operation need of farmers. Some other alternatives, such as improvement on existing footways or van tracks without the proposed road to facilitate motorized village vehicles, are not explored.

A comparison of the merits and demerits of different alternatives prior to implementation of road work are necessary. More importantly, there should be a critical review on the scale of various access roads in Phase 2, so that we need not spend too much effort on recovering agricultural land.

3. Adverse impact on farming activities

The road work would inevitably affect the existing farming activities in Tsiu Keng. We would especially highlight the following issues:

- Similar to the road work in Agri-Park Phase 1, the proposed alignment would cause serious fragmentation of farmland in Tsiu Keng.
- Natural stream and irrigation ditches spotted along the alignment would be affected.
- With reference to Agri-Park Phase 1, many additional temporary access and work site were formed to facilitate road work. During construction phase, topsoil was either be excavated, covered by rockfill or paved with cement (Figure 1). These cause difficulties for topsoil to be restored.
- Again, with reference to Agri-Park Phase 1, even though existing farmers affected by the road work were supposed to be relocated in Agri-Park for farm rehabilitation.

⁴ Section 3.7.7 of The Feasibility Study



The reality was that farm rehabilitation was delayed several times. Currently it is still not clear how farming activities of the affected farmers can be secured.

4. Adverse environmental impact

Similar to the arrangement in Agri-Park Phase 1, no details of Environmental Assessment are available for public inspection. We cannot understand how various environmental impacts were identified, and how they can be avoided, minimized and mitigated during both construction and operation phase. Initially we have the following concerns:

- From the Plans, various road sections would lie very close of the proposed alignment. We can foresee that measures such as water-filled barriers, sand bags, geotextile to cover earth bund, etc., would be put between the worksite and natural stream, but these are merely remedial measures. Still we cannot see any attempts suggest measures, such as setting proper buffer/protection zone for the natural stream.
- We have learnt from the road work in Agri-Park Phase 1 that temporary bridge has to be erected across natural stream and some concrete foundation was once formed at the stream bed (Figure 2). It is still very worrying that similar condition would happen again as several vehicular bridges are now proposed in the plan, and then some temporary bridges have to be erected again prior to those permanent bridges. In this case, there would be disturbance on stream bed during construction phase.
- We are concerned that the proposed road section would be in direct conflict with mature trees and species of conservation species, particularly *Mucuna championii* (Figure 3-5), a tall woody climber spotted in several tree patches in Tsiu Keng.
- As said above, the road would inevitably cause farmland fragmentation, and this would create physical barriers for blocking wildlife passage and increase risk of road kills. Non-flying animal species, particularly amphibian and reptiles, would be more susceptible to such physical blockage.

Conclusion

Tsiu Keng has long been recognized as one of the most active and productive agricultural regions in Hong Kong. As a green group who conducts habitat mapping and rural monitoring work in Tsiu Keng in these few years, CA witnessed high



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development pressure in the proposed Agri-Park. This further highlights the importance of a comprehensive plan for this agricultural area to achieve the goal of sustainable agriculture which supposes to be the core of the New Agricultural Policy. We admit that transportation should be taken into consideration to facilitate logistic arise from farming activities, but the arrangement of this gazette work cannot justify this.

By critically review the road work again, we suggest that the concerned authorities should consider items below:

- Abandon the plan of a single two-lane carriageway
- Identify and evaluate alternatives of road improvement methods
- Evaluate how to improve existing rural footways to facilitate manual handling and motorized village vehicles in daily farming operation in Agri-Park
- Control excessive traffic flow in the farming area. Farms with great dependence on traffic infrastructure but low dependence on natural resources or arable land should not be planned in the Agri-Park, such as leisure farm with high proportion of recreation area, flower farm with focus on importing flowering plants from elsewhere rather than cultivation of flowers, and so on
- Prevent disturbing hydrology of farmland in Agri-Park from road work to ensure protection of farmland
- Provide details for evaluating potential agricultural and environmental impact, such as direct area loss of farmland (both active and abandoned); number of trees to be felled, transplanted and compensated; location of species of conservation importance; updates on habitat map, etc.
- Conduct more public consultation with stakeholders from local farm sectors, villagers, green groups, academics, and so on

Yours faithfully

Ng Hei Man

Campaign Manager

The Conservancy Association



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Cc

Agriculture, Fisheries and Conservation Department

Civil Engineering and Development Department

Designing Hong Kong

Green Sense

Hong Kong Bird Watching Society

Kadoorie Farm and Botanic Garden

WWF – Hong Kong



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Figure 1 During construction of the Agri-Park Phase 1, including the main road work (alignment shaded in red), many additional temporary access and work site were formed. During construction phase, topsoil was either be excavated, covered by rockfill or paved with cement





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Figure 2 During construction of a temporary bridge for the main road in Agri-Park Phase 1, some concrete foundation (circled in red) was once formed at the stream bed



Figure 3-5 *Mucuna championii* spotted in several tree patches in Tsiu Keng

