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29 Sep 2012

Dear Sir/Madam,

**Comments on North East New Territories New Development Areas (NENTNDAs)**  
**Planning and Engineering Study – Stage 3 Public Consultation**

The Hong Kong Bird Watching Society (HKBWS) would like express our comments on the captioned study.

The HKBWS is deeply concerned that the study proposes a number of breaches and deviations from international conventions, local legislation and current policy. Given the serious nature of the concerns, and **HKBWS requests that the responsible official (as identified at the head of each section) would provide a substantive response to the concerns outlined in this submission to all parties copied.** In order to encourage the process of “Open Government” the timing and content of the responses from the relevant officials will be recorded and published in a table on the HKBWS website.

**1. Strategy for sustainable development in NENTNDAs**

**1.1. Conservation of biodiversity with respect to international conventions**  
**(Secretary for the Environment)**

The Convention on Biological Diversity (CBD) has been extended to Hong Kong in May 2011 and the Chief Executive promised to “*formulate a*

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*comprehensive package of nature conservation policies” according to the CBD<sup>1</sup>. According to Article 8 of the Convention<sup>2</sup>, contracting parties shall: “*

- (a) Establish a system of protected areas or areas where special measures need to be taken to conserve biological diversity;*
- (b) Develop, where necessary, guidelines for the selection, establishment and management of protected areas or areas where special measures need to be taken to conserve biological diversity;*
- (c) Regulate or manage biological resources important for the conservation of biological diversity whether within or outside protected areas, with a view to ensuring their conservation and sustainable use;*
- (d) Promote the protection of ecosystems, natural habitats and the maintenance of viable populations of species in natural surroundings;*
- (e) Promote environmentally sound and sustainable development in areas adjacent to protected areas with a view to furthering protection of these areas;*
- (f) Rehabilitate and restore degraded ecosystems and promote the recovery of threatened species, inter alia, through the development and implementation of plans or other management strategies; ...”*

The above should be integrated “*as far as possible and as appropriate, the conservation and sustainable use of biological diversity into relevant **sectoral or cross-sectoral plans, programmes and policies***”<sup>3</sup> under Article 6(b) of the Convention.

The HKBWS appreciates the suggestion to designate Long Valley as a Nature Park for long-term conservation as it is an important step in protecting Hong Kong’s vulnerable biodiversity and cultural heritage. However, apart from the central part of Long Valley, many habitats in the NENT NDAs require protection. **HKBWS cannot observe a clear and thorough integration of the CBD across the NENTNDA proposal.** In particular, sustainable use of habitat, resources (e.g. agricultural land), restoration of degraded habitats and considerations under an ecosystem approach have not been readily adopted in the proposal.

## 1.2. Conservation of agricultural land for sustainable development (Chief Executive)

Agricultural land and agricultural activities serve multiple purposes, including ecologically important habitats, low-carbon development, landscape resources,

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<sup>1</sup> Point 11 of “My pledge on Economic Policy”, Manifesto for the Chief Executive Election 2012, C.Y. Leung, <http://www.ceo.gov.hk/eng/pdf/manifesto.pdf>

<sup>2</sup> <http://www.cbd.int/convention/articles/?a=cbd-08>

<sup>3</sup> <http://www.cbd.int/convention/articles/?a=cbd-06>

recreational resources, centres of agricultural heritage, and commercial value. The above contribute to the living quality of the residents in the area and the sustainable development of Hong Kong. Agricultural activities are also one of the unique cultures of the NENTNDAs. The Chief Executive in his manifesto also promised that he would “*provide support to farmers to develop organic farming*”<sup>4</sup> and “*review the integrated social values of the agricultural industry in Hong Kong from the perspective of ecological landscape and 'Green Hong Kong' and set up an interdepartmental working group to formulate policies to promote and support new-age multifunctional agricultural activities on land suitable for agriculture*”<sup>5</sup>. The sustainable use of agricultural resources is also in line with the article 6 of the CBD.

It is also more appropriate to rehabilitate degraded areas for ecological mitigation/compensation, rather than to enhance the habitat in the central part of Long Valley, which is already of high ecological value and is currently largely occupied for active farming activities. The restoration of degraded ecosystems is also one of the objectives of the CBD.

In light of above, agricultural land should be conserved as far as possible to serve the above purposes. However, the proposed development plan would take away large areas of active and abandoned farmland. HKBWS cannot observe an integration of CBD and the Chief Executive’s pledges in respect of supporting farmers and agriculture in the NENTNDA development proposal.

### 1.3. Strategic Environmental Assessment (Environment & Development Bureaux)

HKBWS is concerned that the environmental impacts of the proposed NDAs have not been comprehensively assessed at the strategic level. According to the ecosystem approach / ecosystem perspective enshrined in the CBD and the technical memorandum of the EIA Ordinance (TM-EIAO)<sup>6</sup>, the NDAs have strong interactions with a number of large-scale projects such as the proposed Lok Ma Chau Loop Development, Liantang / Heung Yuen Wai Boundary Control Point and Associated Works, and future railway development, which are under different stages of the study process. These projects would lead to both habitat loss and habitat fragmentation. We are concerned that these projects or

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<sup>4</sup> Point 43 of “My pledge on Economic Policy”, Manifesto for the Chief Executive Election 2012, C.Y. Leung, <http://www.ceo.gov.hk/eng/pdf/manifesto.pdf>

<sup>5</sup> Point 14 of “My pledge on Environment Protection and Conservation”, Manifesto for the Chief Executive Election 2012, C.Y. Leung, <http://www.ceo.gov.hk/eng/pdf/manifesto.pdf>

<sup>6</sup> S. 5.2.1, EIAO-TM ANNEX 16

outcomes of the studies would have significant implications on the three proposed NDAs. We hope that a Strategic Environmental Assessment could be carried out for the developments which affect the North New Territories, with different scenarios considered.

#### 1.4. Hong Kong Planning Standards and Guidelines (Director of Planning)

Section 2.1 of chapter 10 of The Hong Kong Planning Standards and Guidelines (HKPSG) states that the following principles should be adopted in respect of conservation: “

- (i) *retain significant landscapes, ecological and geological attributes and heritage features as conservation zones;*
- (ii) *restrict uses within conservation zones to those which sustain particular landscapes, ecological and geological attributes and heritage features;*
- (iii) *control adjoining uses to minimise adverse impacts on conservation zones and optimise their conservation value;*
- (iv) *create, where possible, new conservation zones in compensation for areas of conservation value, which are lost to development.”<sup>7</sup>*

HKBWS considers that the Administration, especially the Planning Department, has a duty to set an example in following these basic principles. The points set out below show where the HKPSG appear to have been set aside.

## **2. Long Valley and Kwu Tung North (KTN) NDA**

Long Valley has long been recognized as a site of high ecological value and should be preserved for nature conservation. HKBWS welcomes Government’s suggestion to resume land for conservation but notes that the current proposal will not fully protect the recognized ecological and cultural value of the Long Valley wetlands.

### 2.1. Extend Nature Park to northern part of Long Valley

#### **(Secretary for the Environment, Director of Agriculture, Fisheries & Conservation, Director of Planning)**

HKBWS supports in principle the resumption of land in Long Valley for the purpose of nature conservation. We consider that it is an important step towards meeting the targets and objectives set in the text of the Convention on Biological Diversity and the Aichi Biodiversity Targets in the Strategic Plan 2011-2020<sup>8</sup>.

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<sup>7</sup> S.2.1 of Chapter 10: Conservation, Hong Kong Planning Standards and Guidelines

<sup>8</sup> <http://www.cbd.int/sp/targets/>

The long-term monitoring data of HKBWS and the Conservancy Association (CA), show that more than 140 bird species have been recorded in the agricultural land at the northern part of Long Valley. It is also on the flight-paths of egrets breeding and roosting at the Ho Sheung Heung egretty. It serves as an important ecological corridor between Long Valley and the wetlands in Hoo Hok Wai as well as the rest of Deep Bay, and is thus an integral part of the Inner Deep Bay and Shenzhen River Catchment Area Important Bird Area (IBA) designated by BirdLife International (Figure 1).

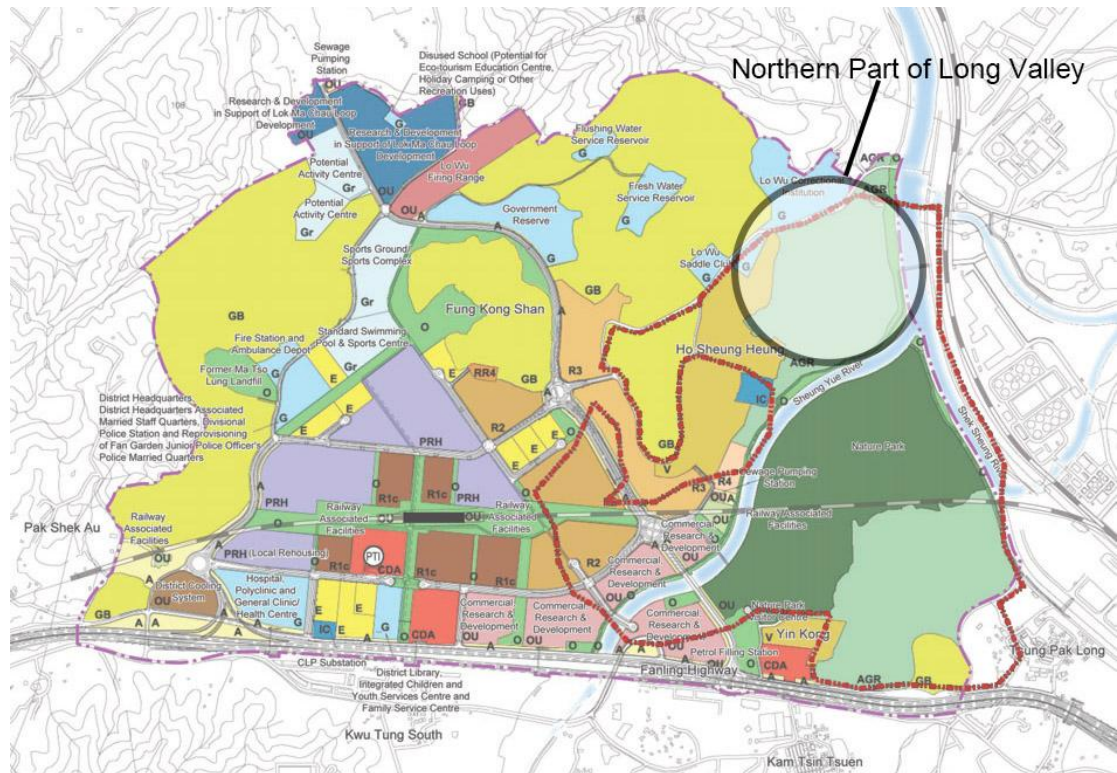


Figure 1. Northern Part of Long Valley is of high conservation value. The boundary of the priority site for enhanced conservation is shown as the red bold line

The current AGR zoning does not provide adequate protection to these ecologically sensitive areas; examples include the illegal dumping of C&D waste and development of village houses in AGR zones. To maintain agricultural activities and ecological value and at the same time respect the rights of land-owners, extending Long Valley Nature Park northwards via rezoning and resumption is the preferable option.

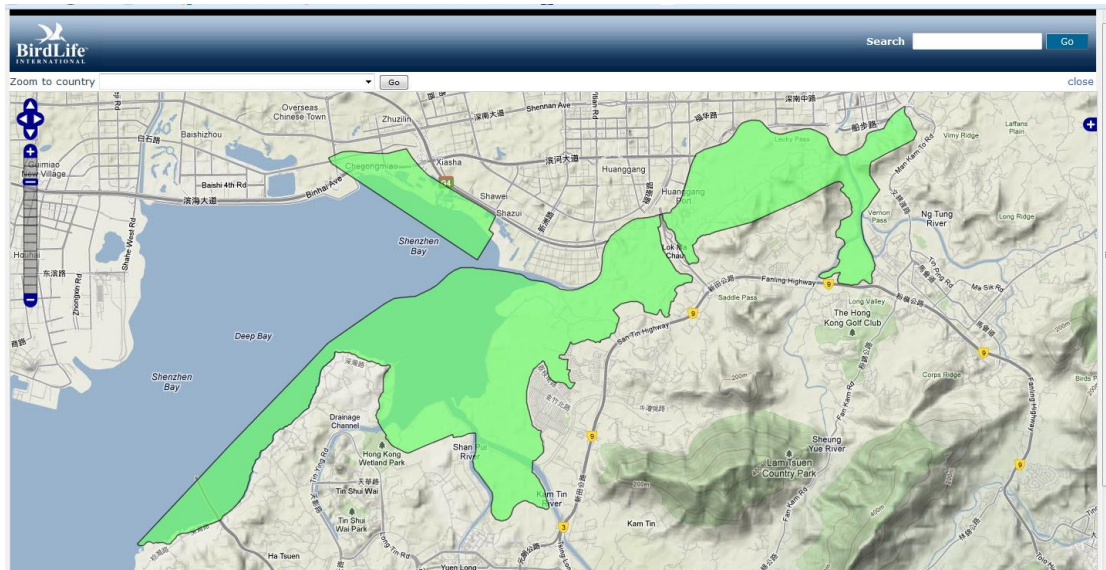


Figure 2. Map of the Inner Deep Bay and Shenzhen River Catchment Area Important Bird Area

## 2.2. Management of Long Valley with a strategy combining agricultural activities and biodiversity conservation

### **(Director of Agriculture, Fisheries & Conservation)**

Agricultural activities created the highly diversified habitats e.g. wet agriculture, fishponds, flea ponds, water channels, dry open farmland and abandoned agricultural land at Long Valley. These, together with habitat management work conducted by HKBWS and Conservancy Association under a series of Management Agreements have attracted a wide range of avifauna and other biodiversity, making Long Valley a site of high ecological value. Long Valley is also the home of one of the five great indigenous clans of the New Territories and has hundreds of years of history in agricultural activities. The long agricultural history, dramatic landscape and interactions between ecology and agriculture, adds to the unique natural and heritage value of Long Valley.

The biodiversity of Long Valley and its wet agricultural activities are intricately linked. Only a management scheme that includes biodiversity conservation and complimentary agricultural activities can show the unique value of Long Valley. Therefore, the future planning and management should go beyond thinking of a Nature Reserve, and actively encourage eco-farming practices that are beneficial to wildlife and environment.

## 2.3. Avoiding mass tourism to Long Valley

Long Valley has long been an agricultural area. The terrain and distribution of biodiversity (refer to attached maps) cannot sustain long-lasting and large human disturbance. Therefore, mass tourism or recreation should not be introduced.

It is also noted that there would be a “Landmark” development to the south-west of Long Valley as well as a site for hotel development near Long Valley. HKBWS is concerned that the high road/pedestrian traffic introduced by these developments, together with the tall buildings, would lead to higher levels of disturbance and other negative impacts on the biodiversity in Long Valley.

#### 2.4. Protect the living of tenant farmers (Chief Executive)

In Long Valley many farmers do not own the land they farm. The Government should protect the livelihood and income of individual farmers by providing adequate compensation and support and respect their choices of living. The Government should be flexible in providing providing different solutions to suit the needs of individual farmers.

The Government should also clarify the methods of compensation as soon as possible, especially for those farmers that are engaged in the Management Agreement project conducted by HKBWS and CA under the New Nature Conservation Policy.

#### 2.5. Concerns regarding habitat compensation in the proposed Nature Park (Director of Agriculture, Fisheries and Conservation, Director of Environmental Protection)

HKBWS considers that the designation of Long Valley as Nature Park is a responsibility of the HKSAR Government under the CBD. The HKBWS supports in principle the designation of the Nature Park to conserve Long Valley in long term.

However, According to the consultant, during the briefing session on 23 July 2012, wetland losses in the three NDA areas would be compensated by management of habitats in Long Valley. it is not appropriate to use the Nature Park for the compensation of wetland loss:

- i) According to the section 16 of the TM-EIAO “*mitigation measures for ecological impact shall preferably be carried out on-site*”<sup>9</sup>;
- ii) Long Valley is already of high ecological value and is highly sensitive;

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<sup>9</sup> EIAO-TM ANNEX 16, 5.4.3

- iii) Most of Long Valley has been occupied for active farming activities which contribute to the ecological value of Long Valley. Wetland compensation would inevitably take away active agricultural activities and drive away farmers who are currently farming in Long Valley;
- iv) Given these existing values HKBWS is concerned that using Long Valley for compensation of wetland lost elsewhere would be “double counting”;
- v) It is more cost-effective to restore degraded areas that are of low ecological value for habitat compensation, rather than carrying out such compensation on areas which are already of high ecological value;
- vi) Such wetland/habitat compensation may weaken the heritage value of Long Valley and is thus not be in line with the HKPSG as highlighted in section 1.4 of this submission;
- vii) HKBWS expects the proponents to present quantitative evidence including baseline ecological studies and a habitat creation and management plan to show that the loss of area and ecological function of active and abandoned farmland, wetland, grassland and other habitats in the NENTNDAs could be adequately compensated through management in the Nature Park at Long Valley without double counting.

2.6. Concerns on the impacts of the development in a recognized site of ecological importance

**(Director of Agriculture, Fisheries & Conservation, Secretary for the Environment)**

***a) Developments near Long Valley***

HKBWS considers that the development density, e.g. Plot Ratio of 3 for Other Specified Uses (Commercial, Research and Development) and height of buildings (e.g. 16 storeys of the “Landmark”) near Long Valley is excessive. The main connection road at the south-west portion of Long Valley would introduce excessive human and traffic disturbance directly into Long Valley, and have significant impact on the landscape quality of the area. The impacts on migratory birds, especially the flight paths of migratory passerines (e.g. Yellow-breasted Bunting *Emberiza aureola*) cannot be readily determined. In such a case, the “precautionary principle”<sup>10</sup> should be applied by limiting the development density and height in areas close to Long Valley.

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<sup>10</sup> Environmental Impact Assessment Ordinance, Cap.499 Guidance Note 1



These proposed developments encroach into the Long Valley and Ho Sheung Heung Priority Site for Enhanced Conservation (Figure 2) and also the Inner Deep Bay and Shenzhen River Catchment Area Important Bird Area (IBA) (Figure 1). Please explain why these important boundaries are not marked on the consultation document.

The 2004 Nature Conservation Policy promotes conservation of Priority Sites for Enhanced Conservation “*in collaboration with the private sector include the Management Agreement Scheme (MA) and Public-Private Partnership Scheme (PPP)*” and “*Under the PPP, development at an agreed scale would be allowed at the ecologically less sensitive portion of a Priority Site provided that the project proponent undertakes to conserve and manage, on a long-term basis, the rest of the site that is ecologically more sensitive*”.

The project proponents should clarify and explain:

1. Why some part of the Priority Site, which is identified by AFCD for “enhanced conservation” and recognized in the HKPSG as habitats to be protected, has been identified for commercial and residential development (Figure 3);
2. Why part of the internationally recognized important area for birds (i.e. IBA) has been proposed for “Landmark” and main roads;
3. Whether the PPP approach (i.e. to develop a part of the priority site and conserve the rest) has been adopted in this case? If so, how is the private sector to be involved in the conservation of Long Valley;
4. Whether the development in the Long Valley and Ho Sheung Heung Priority Site for Enhanced Conservation can be justified under the 2004 Nature Conservation Policy if the government is the proponent (rather than the private sector as stated in the policy);
5. During the briefing session for green groups the ecological consultant claimed that the “spirit” of the 2004 Nature Conservation Policy has been adopted. This appears to be an admission that the letter of the policy has been breached. Why is this considered acceptable?

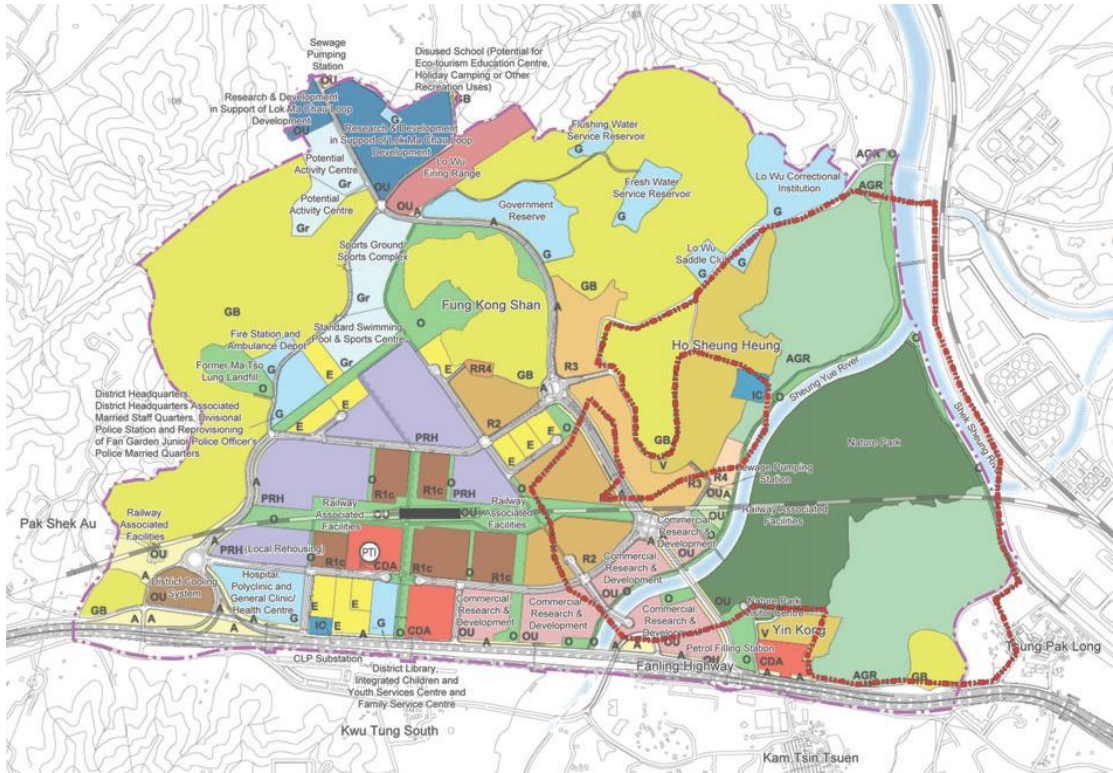


Figure 3. The priority site for enhanced conservation (red bold line) has been excluded from all the consultation documents. Figure prepared by HKBWS

Under Article 6 of the CBD, the degraded habitats within the Long Valley and Ho Sheung Heung area which are identified by the AFCD as “Priority Site for Enhanced Conservation” should be restored and utilized to “*promote recovery of threatened species*”<sup>3</sup>. The HKPSG also states that “*Development should normally avoid declared or potential area for conservation use*”<sup>11</sup> and suggest that “*degraded landscapes, which can be reinstated and put to new use*”<sup>12</sup>; The project proponents have disregarded their responsibility under the CBD and the HKPSG. This would set as an unfavourable precedent of improperly legitimising high-density development in a site of recognized local and international importance.

**b) Linkage and association with the Lok Ma Chau loop through Hoo Hok Wai.**

There is significant ecological connectivity between the Deep Bay Area, the Lok Ma Chau Loop, Hoo Hok Wai and the rest of the NENT. We are also deeply concerned about the proposed transport and development linkage between the KTN NDA and Lok Ma Chau Loop, which will directly impact the ecologically important fishponds in Hoo Hok Wai. The cumulative ecological impacts of the

<sup>11</sup> S.3.6.5 of Chapter 10: Conservation, Hong Kong Planning Standards and Guidelines

<sup>12</sup> S.3.4.2 of Chapter 10: Conservation, Hong Kong Planning Standards and Guidelines

Loop Development and the NENTNDAs, especially on the integrity of the wetlands in the Inner Deep Bay and Shenzhen River catchment area IBA, have not been comprehensively discussed in either of the two studies. It should be noted that HKBWS has raised objections<sup>13</sup> to the proposed Lok Ma Chau Loop Development as it is unacceptable in planning and environmental aspects.

### **3. Fanling North NDA**

#### **3.1. Objection to “Government (Urban Tactical Training Complex)” and Roundabout at Man Kam To Road Egrety**

##### **(Director of Environmental Protection, Director of Agriculture, Fisheries and Conservation)**

HKBWS objects to the location of the proposed “Government (Urban Tactical Training Complex)” and Roundabout at Man Kam To Road as the existing egretty would be destroyed by the proposed development. According to the TM-EIAO, “*Potential impacts shall be avoided to the maximum extent practicable such as adopting suitable alternatives (e.g. **change of site**, design, construction method, alignment, layout, programme, etc.)*”<sup>14</sup>. The proponent has not provided justifications for the necessity and the site selection of the “Urban Tactical Training Complex”. According to the TM-EIAO, “*Any project that is likely to result in adverse ecological impacts in areas of ecological importance shall not normally be permitted unless the project is necessary*”<sup>15</sup>.

It should also be noted that there has not been a single successful example of relocation/reconstruction of an egretty in Hong Kong. Every mitigation measure should be tested and proven effective before any construction work starts. It should also be noted that according to the EIAO, “*Where off-site mitigation measures are involved, they shall be considered along with other alternatives e.g. change of site, layout, etc., including modifying or abandoning the project*”<sup>16</sup> and “*well in advance of the works*”<sup>17</sup>.

The proponent is also reminded that all wild birds, their nests, and eggs are protected under the Wild Animals Protection Ordinance Cap.170, and any plan that proposes the destruction of nests may expose the proponent to legal action.

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<sup>13</sup> HKBWS raised objections to the LMC Loop development in both stage 1 and 2 public consultations of the planning and engineering study.

<sup>14</sup> EIAO ANNEX 16, 5.4.1(a)

<sup>15</sup> EIAO ANNEX 16, 3.1 (a)

<sup>16</sup> EIAO ANNEX 16, 5.4.4

<sup>17</sup> EIAO ANNEX 16, 5.4.3

### 3.2. Loss of agricultural land and living of farmers in the area (Chief Executive)

HKBWS is concerned about the loss of agricultural land in the proposed Fanling North NDA. Much of the land in the proposed Fanling North NDA area is still actively utilized for agriculture, in particular areas in Ma Shi Po and Tin Ping Shan Tsuen. These areas contribute to the sustainability of the area as stated in 1.2 above. There are also many farmers sustaining their living by practicing agriculture in the area. HKBWS considers that the agricultural land in Fanling North should be preserved as stated in 1.2 of this submission. This would be beneficial to the future residents in the NDA and more importantly farmers currently living in these areas.

## **4. Ping Che and Ta Kwu Ling NDA**

### 4.1. Impacts on Ping Che Egrettry

#### **(Director of Agriculture, Fisheries and Conservation)**

HKBWS is concerned that the Ping Che Egrettry would be subject to impacts including loss of foraging habitat, increased development pressure and human disturbance and impacts on bird flight-lines. Under the avoidance principle, HKBWS urge to avoid development on wetlands and agricultural land in Ping Che / Ta Kwu Ling NDA to protect their foraging grounds, and avoid massive channelization in the area so as to preserve natural watercourses for foraging egrets and herons. It is also noted from the briefing session on 23 July 2012 that wetland compensation at Shui Hau River is proposed. However, the area along Shui Hau River is suggested to be zoned as “Special Industry”. HKBWS is concerned that the proposed “Special Industry” would hinder the effective functioning of wetland enhancement for breeding egrets and herons.

### 4.2. Concerns on Special Industry and Government Reserve

#### **(Director of Agriculture, Fisheries and Conservation)**

The actual land uses of the “Special Industry” area in the NDA could not be clearly identified. The environmental impact varies a lot between possible industries (e.g. logistics uses vs cultural and creative industries). It is also unclear that how the “strategic location” of Ping Che / Ta Kwu Ling NDA is beneficial to such uses, given that the area is remote from the urban area of Hong Kong. Therefore, HKBWS is of the view that the case for taking agricultural land, active or abandoned, requires further justification.

The northern part and north-eastern part of the NDA (figure 3) is considered to be of moderate to high ecological value, in particular avifauna, according to the

ecological consultants of the project during the briefing session on 23 July 2012, avifauna records of the EIA report for Liantang / Heung Yuen Wai Boundary Control Point and Associated Works and HKBWS's records and preliminary surveys. The wet abandoned agricultural land to the west of Ping Yeung (figure 4), active agricultural land together with fire-maintained grassland in the area, contribute to a locally unique landscape (Figure 5 & 6) and habitat for avifauna. In particular, the area holds high populations of birds that prefer grassy open country habitats including those of conservation importance, such as Bright-capped Cisticola (*Cisticola exilis*) of "Local Concern" and Lesser Coucal (*Centropus bengalensis*) - a Class II protected species in China. Uncommon migrants such as Dusky Thrush (*Turdus eunomus*) and Grey Bushchat (*Saxicola ferrea*) have also been reported in Ping Yeung. Species of conservation interest such as Peregrine Falcon (*Falco peregrinus*) have been observed foraging in the subject area.

Therefore, HKBWS raises an objection to the OU (Special Industries), Government Reserve and OU (District Cooling System) zones in the area and the proposed linking road from the Liantang / Heung Yuen Wai Boundary Control Point connection road, which would have significant impact on the captioned area in terms of habitat loss, habitat fragmentation, human and traffic disturbances as well as landscape impact. HKBWS considers that the above area should be preserved for biodiversity conservation and agricultural purposes.

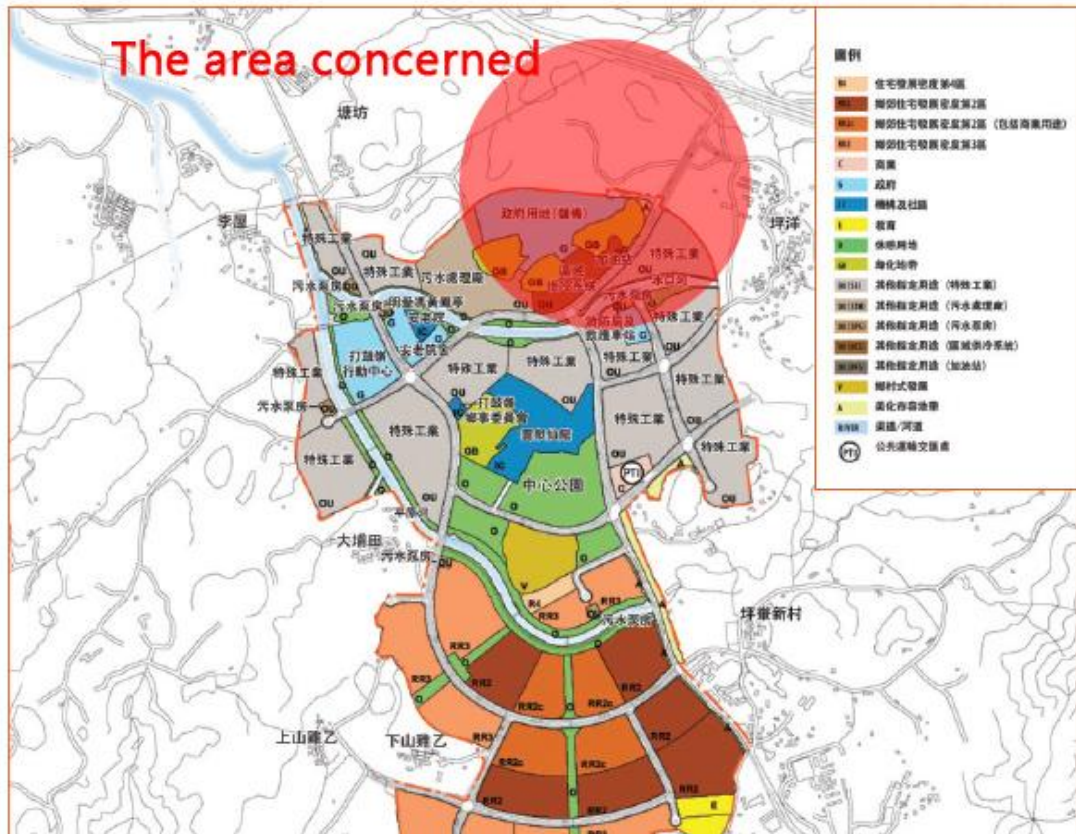


Figure 4. A rough indication of the concerned area of ecological importance near Ping Che



Figure 5. Wet abandoned agricultural land in the area, some zoned as “Government Reserve”



Figure 6. Abandoned agricultural land in the area



Figure 7. The unique landscape and habitat (wet abandoned agricultural land and grassland) in the area

## **5. Comments on Public Consultation**

### **5.1. Public Forum**

HKBWS highly appreciates public forums and workshops that allow different stakeholders to express their ideas and exchange views. This would be essential for the study and development of the NDAs, as it affects a wide range of stakeholders across the whole of Hong Kong.

The HKBWS is concerned that the “Public Meetings with Residents” with very limited seats were held in the 3<sup>rd</sup> stage public consultation. The arrangements for these meetings were not readily available on the study webpage or other government sources. HKBWS only obtained the details of these “Public Meetings with Residents” informally through other concerned parties. HKBWS considers that the arrangements for these public events are not acceptable. The

government organised another public forum on 22<sup>nd</sup> September under strong public pressure. The arrangement of public consultation is therefore considered unsatisfactory for such a controversial development study.

HKBWS has raised a similar concern during the 2<sup>nd</sup> stage public consultation of the Lok Ma Chau Loop study where a public forum, which has not been properly publicized, was cancelled.

## **6. Summary of major concerns**

### **6.1. Ignoring Hong Kong's international responsibilities in respect of nature conservation (Environment Bureau):**

The proposed development:

- a) has not taken into account the text and objectives of the Convention on Biological Diversity;
- b) is encroaching into an internationally recognized site of conservation importance, namely the Inner Deep Bay and Shenzhen River Catchment Area Important Bird Area (IBA), and increasing habitat fragmentation of the IBA together with other development projects in vicinity;

### **6.2. Potential breaches of Hong Kong Legislation (Director of Environmental Protection):**

- a) Breaches of the EIAO in terms of impact avoidance (Section 3.1, 4.2 of this submission);
- b) Breaches of the EIAO in terms of impact mitigation (Section 2.5, 3.1 of this submission);
- c) Breaches of the basic principles of EIA process (various sections of this submission);

### **6.3. Breaches of the existing policies and guidelines:**

- a) inconsistency with the 2004 Nature Conservation Policy (Section 2.6 of this submission) (AFCD/Environment Bureau);
- b) Breaches of the Hong Kong Planning Standards and Guidelines (Section 2.5, 2.6 and other sections of this submission) (Director of Planning);

### **6.4. Inconsistencies with the Chief Executive's Pledge in his election platform (Chief Executive):**

The proposed development will:



- a) affect the living of many local farmers instead of “*provide support to farmers to develop organic farming*”;
- b) taking away large areas of arable land for development instead of “*promote and support new-age multifunctional agricultural activities on land suitable for agriculture*” and “*review the integrated social values of the agricultural industry in Hong Kong from the perspective of ecological landscape and 'Green Hong Kong'*”;
- c) ignoring the principles and objectives of the Convention on Biological Diversity instead of to “*formulate a comprehensive package of nature conservation policies*” according to the CBD;
- d) destroying the unique landscape around Long Valley and other parts of NDA instead of “*take steps to protect outstanding natural scenery as one of our nature conservation objectives, identify places of high scenic value in the territory and adopt appropriate protective measures*”;

Thank you for your attention.

Yours sincerely,

Cheng Nok Ming  
Conservation Officer  
The Hong Kong Bird Watching Society

cc. Chief Executive of Hong Kong SAR  
Secretary for Environment  
Secretary for Development  
Director of Agriculture, Fisheries and Conservation  
Conservancy Association  
Designing Hong Kong  
KFBG  
WWF-HK