

Director of Environmental Protection
Environmental Protection Department
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香港觀鳥會
THE
HONG
KONG
BIRD
WATCHING
SOCIETY

Since 1957 成立

27 Mar 2014

Dear Director,

**Comments on Site Formation and Associated Infrastructural Works for
Development of Columbarium, Crematorium and Related Facilities at Sandy Ridge
Cemetery – Project Profile**

The Hong Kong Bird Watching Society (HKBWS) would like to raise our comments on the captioned project. Our concerns are stated below:



國際鳥盟成員

1. Habitats of conservation concern

Habitat types provided in the Project Profile¹ (recorded from the feasibility study of the project) differ from the findings of the Land Use Planning for Closed Area – Feasibility Study (Closed Area Study). Low-lying habitats such as agricultural land (wet, dry, active and inactive) and pond identified in the Closed Area Study² are missing from the Project Profile. The consultant should refer to the findings of the Closed Area Study and verify whether these low-lying habitats are present within the 500 m study area boundary. A proper ecological assessment should be done for these habitat types. These habitats support a wide range of local fauna and are under-represented in the current protected areas in Hong Kong³, the layout and construction method of the project should avoid any potential indirect impacts.

2. Duration of baseline ecological survey

According to the EIAO guidance note No. 7/2002 Ecological Baseline Survey for Ecological Assessment, the duration of the surveys is dependent on:

- a. The geographical coverage of the study area
- b. The diversity of habitats within the study area
- c. The diversity of flora and fauna within the study area;

¹ Section 4.5.2 of the Project Profile

² Figure 7.7.3 Habitat Map – Planning Area 3. Land Use Planning for Closed Area – Feasibility Study

³ Leven M.R., 1998, 'Special Feature – Focus on Farmlands', Porcupine!, no. 18, Newsletter of Ecology & Biodiversity, The School of Biological Sciences, The University of Hong Kong.

- d. Present of ecological important species or habitats which exhibit distinct season patterns (e.g. migratory animals, seasonal wetlands)
- e. Ecological information of the study are available.

Given the diverse habitat types present (the Closed Area Study identified ten habitat types in the study area, ranging from secondary woodland habitats low-lying agricultural land) (Figure 1), the naturalness of the study area, records of migrant and wintering bird species⁴, along with the diverse group of butterflies and dragonflies⁵, the extent of the baseline ecological surveys should cover at least one full dry season and one full wet season. Furthermore, there have been very few ecological studies done in this area, partly because it was formerly a restricted area, the findings from the EIA may be one of the first comprehensive ecological study at Sandy Ridge.

3. Cumulative and Associated Impacts

Cumulative impacts of the captioned project along with North East New Territories New Development Area, Organic Waste Treatment Facilities Phase 2 and the existing urban environment of Shenzhen should be thoroughly assessed. Cumulative impact assessment should go beyond assessing the construction phase, it should also include assessments on the permanent impacts arising from the operation of these projects, this includes the cumulative loss of natural habitats and the impacts to fauna which are dependent of these habitats.

The HKBWS respectfully requests the Environmental Protection Department to consider our comments above.

Yours faithfully,



Jocelyn Ho
Senior Conservation Officer
Hong Kong Bird Watching Society

⁴ HKBWS data

⁵ Section 4.5.4 of the Project Profile

CC:
AFCD
Conservancy Association
Designing Hong Kong
Kadoorie Farm and Botanic Garden
WWF – Hong Kong

Figure 1 – Habitat map of the study area from the Closed Area Study

