



香港地貌岩石保育協會
Association for Geoconservation, Hong Kong

18 June 2012

To: Director of Environmental Protection Department

Pilot Project for Public – Private Partnership Conservation Scheme, Sha Lo Tung Valley, Tai Po (EIA Study Brief No. ESB-206/2009)

Sha Lo Tung Development Company Ltd. stated that no unacceptable residual environmental impacts are envisaged on all aspects caused by the construction and operation of the Project. However, our Association would like to comment on the following areas which remain questionable:-

- 1) Long term sustainability of the project depends on the sale of the niches which is the primary funding source of the Trust. However, proceeds from the education retreat and the sale of niches will be first used to repay the seed capital provided by SLTD. Estimation of the project amount has not been provided. Will there be sufficient funding left to make the project sustainable after the seed capital have been repaid? If no funding left, will the Government be forced to take up the project?
- 2) 20 m buffer zone is designed but the basis of using 20 m has not been explained. Is 20 m a sufficient cushion for not disturbing the amphibians, dragonflies and butterflies? There is no justification in the report.
- 3) In the noise impact analysis, it is stated the predicted construction noise levels at the Noise Sensitive Receivers (NSRs) comply with the daytime construction noise limit of 75 dB(A). However, there is no assessment of the noise impact on the amphibians, dragonflies and butterflies. Moreover, the noise impact of the visitors and cars for the 60,000 niches (when all sold out) during the Ching Ming and Chung Yeung Festivals are also missing.



香港地貌岩石保育協會
Association for Geoconservation, Hong Kong

- 4) The secondary woodland and upland & hillside landscape in the development site and road improvement will experience moderate adverse unmitigated impact during construction and operation. These can only be reduced to slight adverse after year 10 of operation. How can they say the effect is negligible?
- 5) The impact on the disturbance of amphibians, dragonflies and butterflies with the respective mitigation measures are based on the assumptions made without provision of any scientific justification. In addition, the extent of the effectiveness of these mitigating measures all depend on the compliance with the implementation procedures and strict monitoring and auditing. Therefore the effectiveness of conserving and sustaining ability of all these valuable natural resources by the project remain questionable.

Turning the green belt into the development of columbarium is not recommended as this will set a precedent for application for changing green belt to columbarium. For long term solution of burial or storage of human ash, the easiest, fastest and most effective way is to construct tall buildings in various districts. Vertical development including multi-storey building instead of horizontal development that consumes more land is more appropriate to the situation of Hong Kong. These buildings can then be managed by the Government or contracted to private or NGO to manage.

The primary planning intention of Sha Lo Tung is to conserve the areas of ecological significance, to preserve the natural landscape, to promote conservation and to maintain the rural character of the area. In view of the uncertainties of the effectiveness of the proposed mitigating measures, the residual impact on the dragonfly community and other valuable natural resources cannot be ascertained, the risks can hardly be quantified. Any damage is irreversible.



香港地貌岩石保育協會
Association for Geoconservation, Hong Kong

The invaluable natural resources are not owned by anybody in particular, they are the 'public assets' which do not obviously lend themselves to economic valuation. Conservation of Sha Lo Tung is more important than development. It is highly recommended that the Government should take the precautionary principle by declining the proposal. It would be best for the Government to take the statutory measure by zoning Sha Lo Tung in the Pat Sin Leng Country Park and exchange other land with the developer.

Best regards,

Cindy Choi

Convener: Publicity/Public Relationship

Association for Geoconservation, Hong Kong

Email: cindy@rocks.org.hk

MP: 93704914