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The Conservancy Association

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29th December 2017

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Secretary for Transport and Housing
Transport and Housing Bureau
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Secretary for Development
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By email: sdev@devb.gov.hk

Dear Mr Chan, Prof. Chan and Mr Wong

Objection to PWP Item No. 7471RO The Establishment of An Agricultural Park in Kwu Tung South (Phase 1) – 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) are still very limited so that it is difficult to assess if the proposed alignment is well-justified, and effective to agricultural development. While the development of Agri-Park is divided into two phases, it seems that the proposed alignment is solely connected to the 1st phase. It would not be cost-effective if the alignment is beneficial to part of the Agri-Park but not the whole of it.

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Insufficient information on Agri-Park

According to the masked 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. However, the exact location and scale of these 3 regions in the Agri-Park is still not known. Similar condition can also be applied to the planning of ancillary facilities, 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*”³, 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.

Final road proposal inconsistent with The Feasibility Study

The Feasibility Study also disclosed that “*the proposed road will be designed to a public road standard for a single lane 2-way carriageway*”⁴. The proposed road in the gazette document, however, is a **single two-lane carriageway** which is much wider. This is even much wider than the existing Tsiu Keng Road (a single lane 2-way carriageway, Figure 1) and as wide as Fan Kam Road which is the primary road connection in that district. It is doubtful why the final decision is not in line with the report.

Potential traffic problem

Very often a new road would induce more traffic flow and pave way for additional road widening and improvement work. It might not necessarily improve accessibility but create more traffic problem and development pressure in adjacent. The Feasibility Study has revealed that the priority junction at Fan Kam Road and Tsiu Keng Road will be upgraded “*to provide*

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 Section 3.7.7 of The Feasibility Study

⁴ Section 3.7.4 of The Feasibility Study

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*sufficient spaces for turning vehicles*⁵ while the section of Tsiu Keng Road between its junction with Fan Kam Road and the proposed main access road to Agri-Park will be widened⁶. Since potential environmental impacts brought by the entire road improvement work are not presented in full, CA highly worries that the gazette road work is just the first step of the road improvement plan to create traffic congestion in Tsiu Keng.

Impact on farming activities

The road work would inevitably affect the existing farming activities in Tsiu Keng. For example, the proposed alignment would encroach certain amount of farmland in Tsiu Keng (Figure 2). The closure of some footpaths is indeed the main access for farmers in the farming area. Natural stream and irrigation ditches spotted along the alignment would be potentially affected. These would affect daily operation of farming activities in the area both temporarily and permanently. However, we cannot see how the associated impacts on farming activities during the construction and operation phase of Agri-Park can be avoided or minimized. We understand that existing farmers affected by the road work would also be accommodated in the 1st phase Agri-Park, but currently detailed arrangement on farm rehabilitation in the Agri-Park is not clear to secure livelihood of farmers.

Alternatives not been explored

No information is available to explain where there are no other alternatives of road alignment and design, or why the current proposal is the most preferable to fulfill operation need of farmers. There could be still some other alternatives not been explored, such as improvement on existing footways or van tracks without the proposed road to facilitate motorized village vehicles, the single lane 2-way carriageway just recommended in The Feasibility Study, an existing village road connecting Kwu Tong Road to northwest corner of the site⁷, and so on. A comparison of the merits and demerits of different alternatives prior to implementation of road work are necessary.

⁵ Section 4.3.1 of The Feasibility Study

⁶ Section 4.3.2 of The Feasibility Study

⁷ This alternative possible routing, according to the Feasibility Study, will be investigated in the detailed design stage. See Section 4.2.9 of The Feasibility Study

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Even though The Feasibility Study has stated that the proposed main road “*is preferable to be located in the central location of the Agri-Park*”⁸, it is responsible for the departments to further explain such preference.

No justification on proposed modification of the footpath

We note that the captioned project also included an existing footpath to be modified (marked in green in the gazette document, Figure 3 and 4). However, no information has been included in the gazette document to justify the need of such work, how it is related to the plan of 1st phase Agri-Park, and how it would be modified. As the proposed work has not been mentioned in both the Feasibility Study and papers of Northern District Council, we are highly skeptic why this item has to be put in the entire road work.

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 development pressure in the proposed Agri-Park. Although most of the farmland are left abandoned or fallow, from our study in about 165,000 square meters of farmland in this area, still 45% of active farmland remains and is quite concentrated. 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-land carriageway which has not been mentioned or recommended in The Feasibility Study
- Provide more details of Agri-Park as soon as possible to allow further discussion on transportation requirement of Agri-Park

⁸ Section 3.7.4 of The Feasibility Study

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- 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, such as wet farmland and dry farmland with furrow irrigation which are potential area for enhancing biodiversity
- Conduct more public consultation with stakeholders from local farm sectors, villagers, green groups, academics, and so on

Yours faithfully

Ng Hei Man

Campaign Manager

Cc

Agriculture, Fisheries and Conservation Department

Civil Engineering and Development Department

Designing Hong Kong

Hong Kong Bird Watching Society

Kadoorie Farm and Botanic Garden

Produce Green Foundation

WWF – Hong Kong

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Figure 1 Tsiu Keng Road, a single lane 2-way carriageway



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Figure 2 Active farmland affected by the proposed road



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Figure 2 (con't)



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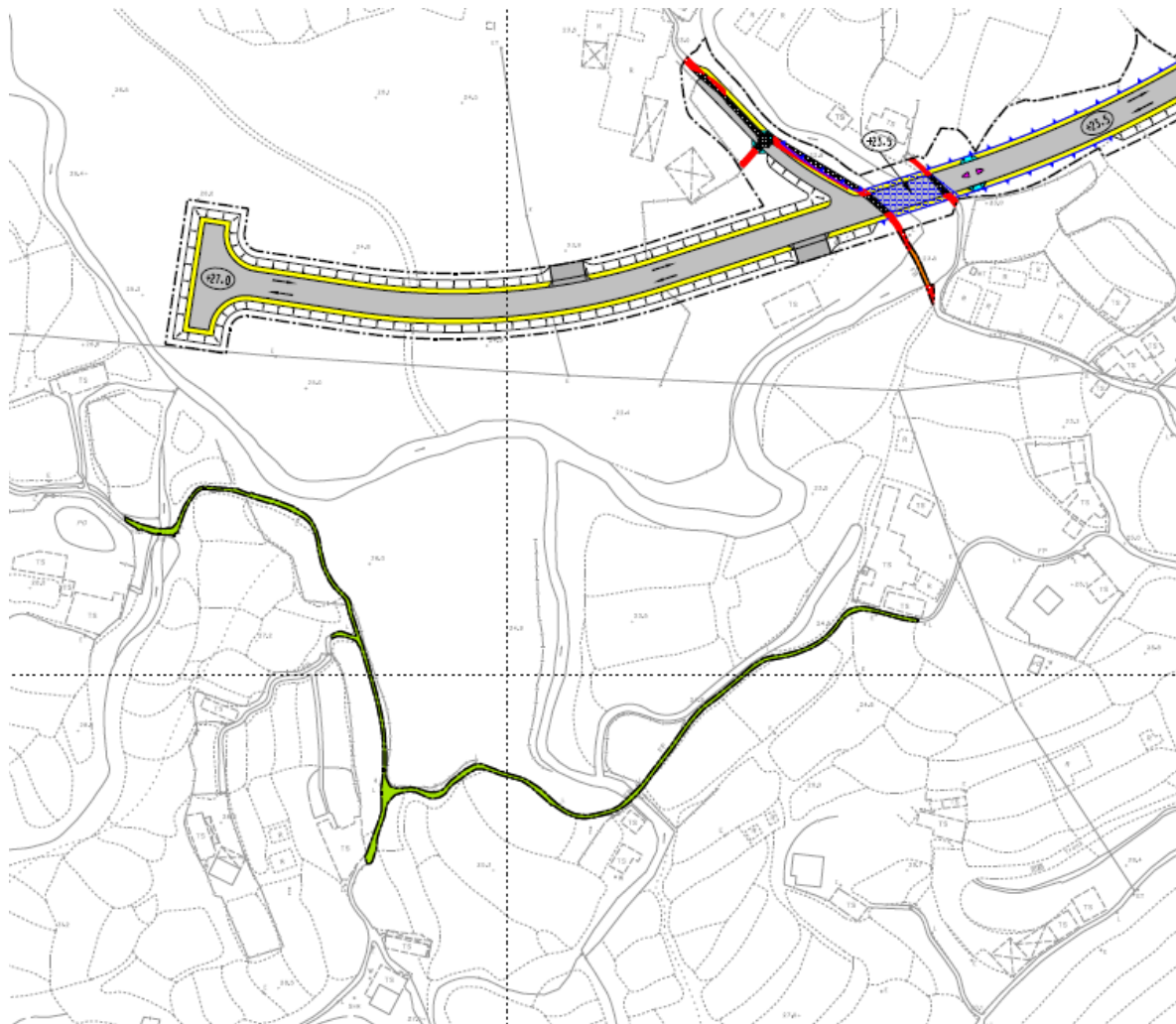
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Figure 3 The proposed footpath to be modified (marked in green) according to the gazette document. No information has been included in the gazette document to justify the need of such work



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Figure 4 Existing condition of the proposed footpath



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