

Executive Summary of Technical Review of EIA Tree Survey

(Rev.1)

BACKGROUND

In May 2022, the Environmental Impact Assessment (EIA) prepared under CE17/2019(CE) Technical Study on Partial Development of the Fanling Golf Course Site was uploaded for public inspection. The EIA contains a Landscape and Visual Impact Assessment (LVIA), which includes a detailed tree survey completed in February 2021 of Sub Area 1 (referred hereafter as 'EIA Tree Survey'), where the public housing development (PHD) is planned to be located. The Hong Kong Golf Club (HKGC) has appointed URBIS Limited to undertake a special focussed tree survey (referred hereafter as 'HKGC Tree Survey') of the **1,104 trees** located in the portion of Sub Area 1 proposed to be developed, to verify the findings of the EIA Tree Survey. The HKGC Tree Survey was undertaken in February to March 2023.

FINDINGS

The EIA Tree Survey is replete with very serious inaccuracies in all aspects of the tree survey including the total number of trees, species identification (including rare and/or protected species), tree locations, and tree dimensions (diameter at breast height (DBH), height and canopy spread).

- The HKGC Tree Survey has tagged **460 trees** missing from the EIA Tree Survey. 156 of these trees might possibly have been undersize in February 2021, but the remaining **304 trees** (at least) are far too big to have been undersize in 2021 and should have been recorded. The EIA Tree Survey thus missed about one quarter of the trees on site in 2021. Huge trees in excess of 25m height (Trees of Particular Interest - TPIs) were missed.
- There are **57** instances of wrong species identifications including rare and/or protected species (TPIs).
- There is serious under-recording of tree DBH. On average and taking account of tree growth between the 2 surveys, the EIA Tree Survey recorded DBH at a maximum of only **86%** of actual DBH.
- There is very serious under-recording of tree height. On average the tree heights are recorded at only **76%** of actual tree heights. Some trees were recorded at **under half** their actual height. The largest shortfall in height measurement is **15.7m**. This has consequential serious repercussions for identification of tree protection zones.
- There is very serious under-recording of tree canopy spread. On average the tree canopy spreads are recorded at only **59.8%** of actual canopy spreads in open areas and **66.3%** of actual canopy spreads in woodland areas. This has consequential serious repercussions for identification of tree protection zones.
- The HKGC Tree Survey found **31** more TPIs (total **84**) than recorded in the EIA Tree Survey (**53**).
- The HKGC Tree Survey found **5** more large TPIs (total **25**) than recorded in the EIA Tree Survey (**20**) in the resurveyed area. These large TPIs are potential Old and Valuable Trees (OVTs) and should be reviewed for eligibility for registration as OVTs in accordance with DEVB TC(W)5/2020.
- By objective comparison on a like-for-like basis with the physical characteristics of existing OVTs in the Register, it is assessed that of the total **29** large TPIs within Sub Area 1 (25 TPIs in

resurveyed area and 4 TPis outside resurveyed area), **25 large TPis** at Fanling are very likely (**16**) or likely (**9**) to meet the criteria to be registered. The only other locations in Hong Kong that have similar high density of OVTs in such a small area are Kowloon Park (42 OVTs) and Victoria Park (14 OVTs). In accordance with DEVB TC(W)5/2020, living OVTs shall **not** be removed. This has serious repercussions for tree protection zones and remaining developable area for the PHD.

- Plans showing Tree Protection Zones prepared in accordance with DEVB GLTMS Guidelines show that the PHD layout would require removal of at least 16 large TPis (potentially registrable OVTs) and most of the Secondary Woodland of Ecological Importance.

CONCLUSION

In conclusion, the very large number of serious omissions and errors in the EIA Tree Survey render it a wholly inaccurate survey that is a very serious misrepresentation (undervaluation) of both the quantity and quality of trees in the Survey area, which are directly comparable with the quantity and quality of existing OVTs in Kowloon Park and Victoria Park. The EIA Tree Survey is therefore not a reliable document upon which to base the objective assessment of the significance of tree impacts and landscape impacts caused by the proposed PHD, the identification of appropriate levels of tree compensation, the planning of TPZs, nor the consequent identification of remaining areas outside the TPZs that are suitable for development of the PHD.

The proposed PHD development would create far greater tree impacts and landscape impacts than were identified in the EIA, including the removal of 16 large TPis (potentially registrable OVTs) and most of the Secondary Woodland of Ecological Importance, and it may be surmised that if this information had been made available to the Task Force for Land Supply in 2017-2018, the TFLS would not have earmarked this site for potential housing development.

As a result of the aforementioned very serious errors and omissions in the EIA Tree Survey and consequent error-strewn assessment in the LVIA (and notwithstanding the many other unrelated significant errors and omissions in the LVIA that have been previously identified in the Technical Review of the Landscape and Visual Impact Assessment of the Partial Development of Fanling Golf Course, dated June 2022) the EIA should be rejected because it cannot be considered a believable or reliable document and it does not provide the Advisory Council on the Environment and Director of Environmental Protection with a sound basis for a rational decision.



Alexander M Duggie
BSc (Hons), BPhil, FHKILA, RLA, CMLI, MHKIEIA, MHKIUD, MHKIQEP, BEAM Pro (NB, EB, ND)
Managing Director | URBIS Limited

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