



長春社 Since 1968

The Conservancy Association

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21st September 2021

Town Planning Board
15/F North Point Government Offices
333 Java Road
North Point
Hong Kong

By e-mail: tpbpd@pland.gov.hk

Dear Sir/Madam,

RE: Comments on the Section 16 Application No. A/YL-MP/315

The Conservancy Association (CA) considers that Mai Po Ramsar Site is not only within Wetland Conservation Area (WCA) under Town Planning Board Guideline No. 12C, but also an internationally recognized wetland. Therefore, any works within the area should be strictly evaluated. Viewing that there are various inadequacies in this planning application, further information should be included.

1. No environmental assessment

It seems that the entire document merely contains details of work. There are no brief overview on ecological condition of the project site and its surrounding environment; no additional survey or verification of the past assessment results. We worry that all potential environmental impacts caused by the work during construction and operation phase, such as water quality, noise and ecology, indeed have not been fully addressed in this stage.

Initially we have the following suggestions:

- i. More elaboration on ecological condition of the project site and its surrounding environment, particular recognized sites of conservation importance, is necessary.
- ii. The project proponent should clearly identify potential environmental impacts during construction and operation phase.



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2. Mitigation measures for potential environmental impacts

Currently we cannot see any mitigation measures to mitigate potential environmental disturbance, since, as said above, potential environmental impacts have not been clearly identified. Particularly we have the following concerns:

- i. Measures should be introduced to avoid potential disturbance on the night roosting ardeid next to PSFSC forecourt. For example, works should be scheduled at least one hour after sunrise and over one hour before sunset.
- ii. Measures should be introduced to avoid potential disturbance on Mai Po Village egretty near the V zone. For example, all works should be avoided during breeding season of egrets.

3. Concern on cumulative impact

The previous underground stormwater drainage pipe (A/YL-MP/305), upgrading work of public fire hydrant in Tam Kon Chau Road (A/YL-MP/309) and this planning application are indeed part of the demolition and re-construction of PSFSC, but all works are not mentioned in its Environmental and Ecological Assessment (EEA). We still worry that if there are any other utilities associated with the demolition and re-construction of PSFSC. We would suggest that cumulative impacts due to other planned and committed works, including all associated utilities, and the demolition and re-construction of PSFSC, should be evaluated.

Yours faithfully,

Ng Hei Man

Campaign Manager

The Conservancy Association