



長春社 Since 1968

The Conservancy Association

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27<sup>th</sup> November 2020

Ms. Cheng Mei Sze, Maisie, JP  
Director of Environmental Protection  
Environmental Protection Department  
Environmental Impact Assessment Ordinance Register Office

By E-mail: [eiaocomment@epd.gov.hk](mailto:eiaocomment@epd.gov.hk)

Dear Ms. Cheng,

RE: Comments on Upgrading of Nim Wan Road (North) Project Profile

The Conservancy Association (CA) would like to express our concern on the captioned.

**1. Justification of the project**

Referring to Section 1.2.1 and 1.2.4, we still do not understand why a standard single 2-land carriageway is necessary “for better accessibility to the government facilities located at the northwestern end of New Territories”. Facilities such as T Park and WENT Landfill extension would not attract substantial amount of visitors. Columbarium in Tsang Tsui would only attract comparatively large traffic flow during Ching Ming and Chung Yeung Festival, and there have been already alternative route from Tuen Mun to Tsang Tsui. We cannot see urgent need to upgrade the existing Nim Wan Road in such large scale. We in principle do not support this road upgrading project.

**2. Impact on intertidal area and watercourses**

As mentioned in the Project Profile, patches of seagrass bed (*Halophila beccarii*) which is the important breeding and nursery ground for horseshoe crabs (*Tachypleus tridentatus*, *Carcinoscorpius rotundicausa*) can be identified in the intertidal area near the work site. Intertidal mudflat might also serve as potential feeding ground where major prey of waterbirds can be found in. It happens as if direct habitat loss on intertidal area might not be anticipated, but we note that some watercourses



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affected by the project are running from the work site to the intertidal area. We worry that those species of high ecological value can still be highly disturbed during construction and operation phase of the project.

For intertidal area and watercourses CA would suggest the following issues should be included in the future assessment:

- i. Both direct and indirect habitat loss, as well as fragmentation of habitat due to the project should be evaluated.
- ii. Appropriate measures should be suggested to avoid/minimize or mitigate any potential adverse impacts and human disturbance. For example, all stream courses and water channels, their tributaries, small watercourse with unclear sources, and their riparian zone should be avoided from decking, diversion, excavation, concrete-paving and so on.

### 3. Two work sites away from Nim Wan Road

We note that two work sites are identified quite far away from Nim Wan Road (Figure 1) but the Project Profile does not mention specific works to be carried out in two work sites. One of them is now a fish pond (Figure 2) zoned Coastal Protection Area. Since an active egretty can be spotted in Pak Nai, any fishponds in adjacent might be potential foraging ground for ardeid such as Little Egret and Chinese Pond Heron inhabit in that egretty. We worry if the ecological linkage between the fish pond and the adjacent active egretty has not been taken into consideration.

For another one, it is located very close to existing settlement. According to Table 4.1 and 4.2, however, it seems that air and noise sensitive receivers (ASR and NSR) are identified with reference to the distance from the road alignment only. This site is also just opposite to the declared monument and within Ha Pak Nai Site of Archaeological Interest archeological site. Likewise, possible impacts and protection measures on cultural heritage suggested in Project Profile are mainly based on the work along the road alignment.

In this case, CA would suggest the following:

- i. Specific work within these 2 work sites should be clearly mentioned.
- ii. Appropriate measures should be suggested to avoid/minimize or mitigate any



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- potential adverse impacts and human disturbance. In particular, pond filling should be avoided and prohibited in that fish pond.
- iii. Existing village houses in Ha Pak Nai near that work site should be identified as ASRs and NSRs in the environmental impact assessment process, if major work would be proposed in that work site.

#### 4. Disposal of construction and demolition (C&D) waste

Section 3.5.1 has already mentioned that “The construction works including excavation works, backfilling, construction of bridge structure, etc. will generate certain amount of construction and demolition (C&D) materials comprising inert and non-inert materials”. In the past few years, we have frequently spotted illegal dumping of C&D waste in agricultural land and fish pond in Pak Nai. If C&D waste is not properly managed in this project, such activities would be more frequent and the environment in Pak Nai would be further worsened.

We hope that the project proponent should propose stringent control and monitoring measures on the construction vehicles/dump trucks to prevent any construction waste dumping on ecologically sensitive area in Pak Nai. For example, construction vehicles/dump trucks should be equipped with GPS devices. Specific transport route should be designated for construction vehicles/dump trucks to ensure proper waste disposal. Implementation of such measures and associated penalties shall be included in the contract terms to effectively control the activities of relevant contractors.

Thank you for your attention.

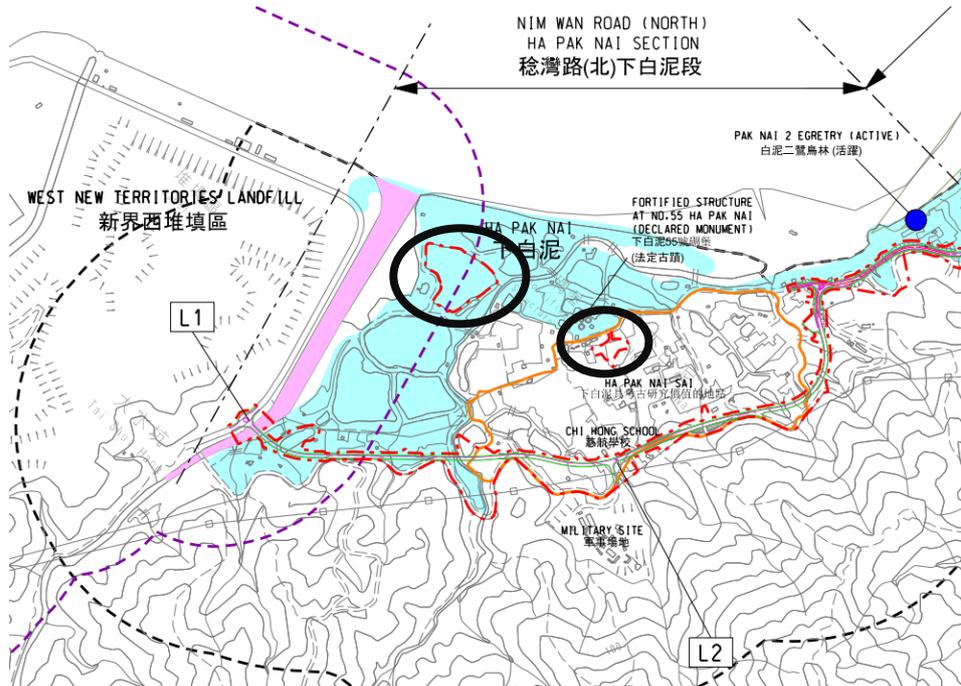
Yours sincerely,

Ng Hei Man

Campaign Manager

The Conservancy Association

**Figure 1** Two work sites (circled in black) are identified quite far away from Nim Wan Road but the Project Profile does not mention specific works to be carried out in two work sites



**Figure 2** One of the work sites is now a fish pond (circled in red) zoned Coastal Protection Area

