



長春社 Since1968

The Conservancy Association

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20th May 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/305

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. However, we are in reservation of the proposed work in this stage, as we note that various inadequacies in the Ecological Impact Assessment (EcoIA) have not been clearly clarified and addressed. Further information should be included in this application.

1. Inadequacies in habitat map

Figure 2 of the EcoIA does not reflect accurately the existing habitat within the study area. For example, areas marked “Developed area” are indeed full of vegetation and trees. Terms such as “Wooded area”, “Trees” are too generalized. We also do not understand what “Island” would be in the map. Although Figure 3 extracted from Environmental and Ecological Assessment (EEA) has presented all habitats within the study area, the proposed alignment of stormwater drainage pipe is not shown. Habitat types in Figure 2 and 3 are also inconsistent and we feel hard to follow. Such presentation would greatly affect identification and evaluation of ecological impact brought by the proposed work.

We suggest that a comprehensive habitat map should be prepared in the EcoIA.



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2. No provision of work programme

Although the Planning Statement has mentioned the development parameter of the work (Section 3.2), no details have been provided for the work programme. For example, according to both the Planning Statement and EcoIA, all construction works are claimed to be completed within 6 weeks and most excavation done in about 2 weeks. However, it is still unsure which exact month the excavation and related works would be commenced. This is important as the proposed work is within Mai Po Ramsar Site supporting overwintering birds in winter every year. Therefore, it is necessary for the work programme to prevent overlapping with the overwintering bird period.

3. Inadequate assessment on potential environmental impacts

It seems that the EcoIA is just extracting all results from the past EEA but there were no additional survey or verification of the past assessment results. From the part “Sequence of Works” (Section A.1.10) in EEA, however, we cannot find any installation works of underground stormwater drainage pipe. Most of the evaluation in this EcoIA, therefore, would be irrelevant to a certain extent. Even the EcoIA has come across potential impacts brought by the excavation work of pipe installation, they are not quite detailed. Besides, despite provision of mitigation measures (as stated in the Planning Statement), it is still hard to evaluate how effective those mitigation measures would be without a proper environmental assessment.

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.

While we suggest that the project proponent should identify clearly potential environmental impacts during construction and operation phase, here we also wish the project proponent to clarify some of the issues:

- i. As Deep Bay is an ecological sensitive area, a “Zero Discharge Policy” for Deep Bay has been implemented in Deep Bay catchment. Please specify how the proposed work fulfills “Zero Discharge Policy” for Deep Bay during construction and operation phase.



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- ii. Section 3.2.2 of the EcoIA admitted that “*The commercial fishponds and wooded area immediately adjacent to the construction and excavation alignment will encounter some noise levels during the day when construction activity happens*”. As these areas can be utilized by wildlife, it is important to clearly specify the exact unmitigated noise level, and then suggest proper measures to minimize or mitigate noise. Simply claiming that “*these areas are already impacted by noise from anthropogenic activity*” is not well-justified.
- iii. Would any potential disturbance be resulted on the night roost at the tree group next to the Peter Scott Field Studies Centre (PSFSC) forecourt during the pipe installation? Would it be necessary to restrict working hours to avoid potential disturbance?
- iv. For trees close to the alignment of the pipe, would they be felled? If yes, are there any compensatory planting plans? If not, are there any tree protection zones to separate the work site and those trees?
- v. It seems that the proposed mitigation measures in Summary (Section 5 of the EcoIA) are not totally consistent with the other sections. Some of the proposed mitigation measures are missing in Summary. Please critically evaluate which mitigation measures would be put into practice.

4. Concern on cumulative impact

The previous upgrading work of public fire hydrant in Tam Kon Chau Road and PSFSC and the current underground stormwater drainage pipe are indeed part of the demolition and re-construction of PSFSC, but both works are not mentioned in the EEA. We still worry that if there are any other utilities associated with the demolition and re-construction of PSFSC.

Meanwhile, Section 4.4.1 of EcoIA mentions that “*Surveys indicate that even with the noise and activity from construction in the Field Studies Centre many birds—from waterbirds such as Grey herons, egrets, cormorants, and grebes to passerines—are still active with no indication of being disturbed and no mitigation measures are necessary*”. As no frequent updates of the monthly Precautionary Ecological Checks or Environmental Impact Monitoring Report can be seen on the Mai Po Community website, it is necessary to provide those surveys to evaluate potential cumulative impact caused by the associated work in PSFSC.



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Simply speaking, 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