



長春社 Since 1968

The Conservancy Association

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26th July 2022

Environmental Impact Assessment Ordinance Register Office
Environmental Protection Department

By E-mail: eiaocomment@epd.gov.hk

Dear Sir/Madam,

Comment on Drainage Improvement Works in Ta Kwu Ling – Investigation, Design and Construction EIA Report

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

1. Loss of massive trees and woodland

Section 11 of the EIA reveals potential loss of trees and woodland due to the proposed project:

“A total of 1,057 nos. of exiting trees were identified within the proposed river alignment. They are subject to retain (239 nos.), fell (632 nos.), transplant (171 nos.) and to be felled and dead (15 nos.).” (Section 11.7.1)

“There are no old and valuable trees (OVTs) included in the ‘Register of Old and Valuable Trees’ under DEVB TCW No. 5/2020 within the proposed river alignment. However, there are 14 nos. of potential OVTs within the proposed river alignment (of which 5 will be retained and the rest will be felled). The height of the affected trees ranged from 8m to 18m while the DBH ranged from 924mm to 1,487mm.” (Section 11.7.2)

“A total of 167 nos. of Aquilaria sinensis (土沉香) are identified within the proposed river alignment ... The height of the affected trees ranged from 2m to 10m while the DBH ranged from 95mm to 223mm. They are classified as a significant tree or with special conservation status as per Protection of Endangered Species of Animals and Plants Ordinance (Cap 586). Approximately 1 of them will be retained and 166 will be transplanted.” (Section 11.7.3)



While the EIA report claims that measures such as compensatory tree planting and tree transplantation would be proposed, we are still very concerned if the proposed development can be further adjusted to avoid/minimize direct loss of mature trees and woodland.

2. Unclear elements of river revitalization plan

Co-creation focus groups and workshops have once been held few years ago to discuss potential to revitalize tributaries of Ping Yuen River within the proposed site. The EIA report seems to mention some elements of the revitalization plan:

“The public spaces adjacent to TKL04 and TKL05 will be constructed in form of open space, wetland and woodland. The detail usage will be further reviewed in the detailed design stage to refine the design such as types of leisure facilities, planting species and landscaping details etc. The proposed woodland and wetland can create ecological linkage with nearby habitats, provide extra water storage capacity in the area, enhance biodiversity by improving or re-creating stream habitat to attract faunal species (i.e. birds and fishes), improve the amenity value by incorporating water feature and provide foraging area for fauna, especially water birds, which maybe roosting and nesting at the nearby woodland. Also, the open space is designed for community gathering and leisure in order to enhance the unity in Ta Kwu Ling area.” (Section 2.3.2)

Viewing the above, however, there are still very limited details and it would be difficult to evaluate if associated works and human activities would be resulted during both construction and operation phase. Therefore, additional information on the above is necessary.

While detailed design of various landscaping features would be provided in the next stage, we would point out some concerns commonly raised out in the past:

- Excessive landscaping plants are over-growing along the channel
- Invasive species are spreading along the channel
- Refuse is trapped by landscaping plants in the channel
- Large-sized rip-rap is used so that no obvious surface flow can be spotted and the entire channel seems to be dried up



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- All landscaping and revitalization work are confined to channel bank only

We hope that the above concerns would be properly handled as well.

3. Impact on agricultural land

Within the site area, both active agricultural land, and abandoned land with good potential for farm rehabilitation can be spotted. Even though the EcoIA concludes that ecological value of agricultural land and overall impact severity due to direct loss of agricultural land are low, we have to highlight that Ping Che/Ta Kwu Ling Area has long been one of the established agricultural bases in New Territories. As the agricultural land in the Area is generally in low degree of fragmentation, they should still be protected with the greatest effort.

We opine that the following items should be further elaborated and evaluated:

- Construction of water-well and wetland

Table 2.12 mentions that “*Water-well will be re-provided at identified locations and the proposed wetland can also support the local farming activities apart from environmental value*”. For water-well, issues such as numbers of new water-well to be re-provided, and whether additional loss of agricultural land and potential disturbance on agricultural land would be resulted during construction and operation phase respectively, are unknown.

For the proposed wetland, whether it is feasible to serve ecological function and irrigation at the same time is still in doubt.

- Provision of animal corridor

Figure 8.6 demonstrates the conceptual design of the animal corridors (Figure 1). While we understands from Section 8.3.3 that “*The proposed design, number, and location of the animal corridor subject to further change in the detailed design stage*”, we still worry that such arrangement would not mitigate any habitat fragmentation effects and direct loss of terrestrial species, particularly amphibians and reptiles.

For example, from the initial ladder-like design, it seems that the corridor would end up on public road which is prone to human disturbance. It is also unclear why the proposed animal corridors are only installed on one side rather than both side of the



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channel. Besides, we are concerned if the option of underpass (in different forms such as box culvert, pathways, etc.) has been fully explored, and if there is few rooms for improving steepness of the crossing, viewing that level difference between river bed and the upper channel structure.

- Scale of temporary access and worksite

In many projects, we have witnessed various temporary access (either major or minor) and worksite for storage and parking space. All these lead to permanent and temporary loss on agricultural land. It is necessary to clarify these details.

Moreover, although very often it was claimed that associated works area would be reinstated after works completion, the condition of agricultural land was far from satisfactory. Therefore, the scale of temporary access and worksite should be critically reviewed and reduced so that additional resource is not necessary to be spent on recovering agricultural land.

4. Proper disposal of construction and demolition (C&D) waste

In the past few years, we have frequently spotted illegal dumping of C&D waste in the Study Area and its adjacent. If C&D waste is not properly managed in this project, such activities would be more frequent and the environment, particularly agricultural land in adjacent, would be further worsened.

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 within and adjacent to the project site. 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.

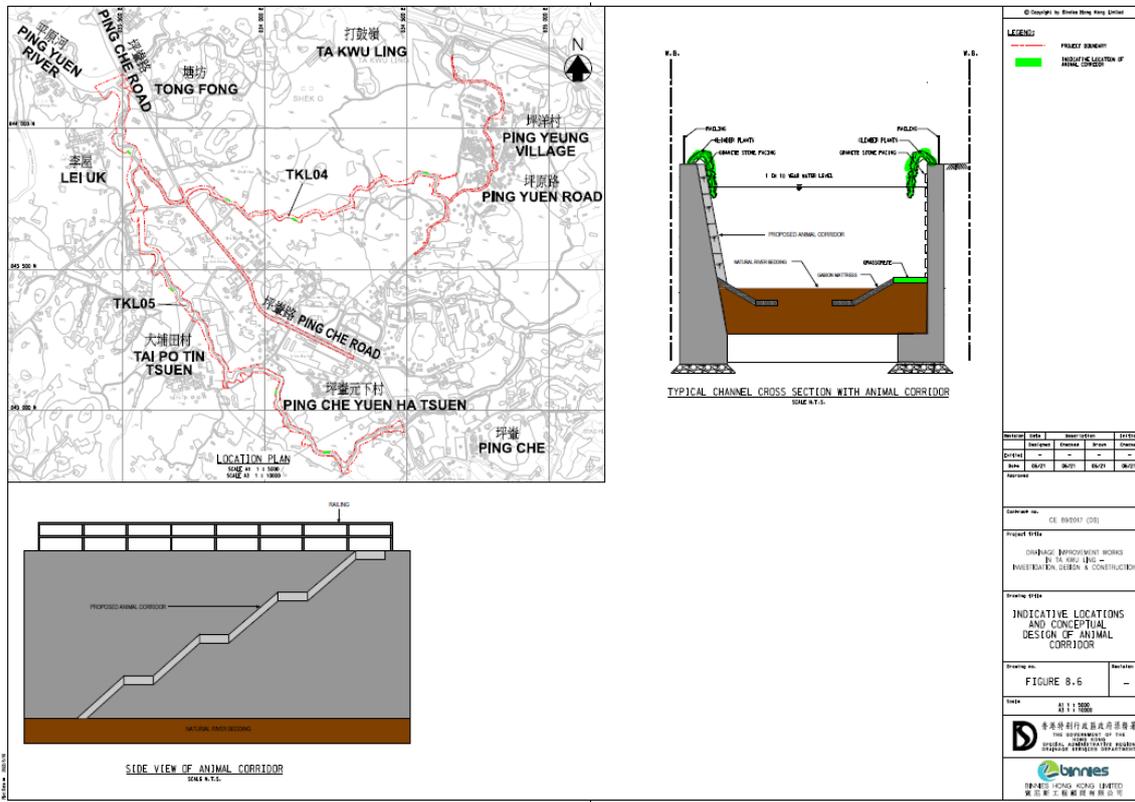
Yours faithfully,

Ng Hei Man

Campaign Manager

The Conservancy Association

Figure 1 The conceptual design of the animal corridors (Extracted from Figure 8.6 of the EIA report¹)



¹ Indicative Locations and Conceptual Design of Animal Corridor