



長春社 Since 1968

The Conservancy Association

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27th September 2022

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,

Comments on the Section 16 Application No. A/TP/684

The proposed application site lies in adjacent to Tai Po Kau Nature Reserve which is designated as “Special Area” under Country Park Ordinance (Cap. 208). Given that the area is recognized as high ecological and conservation value, The Conservancy Association (CA) opines that any future activities in the application site should avoid irreversible environmental and ecological impacts. Regarding various assessments in the current planning application, we would express the following concerns.

1. Impact on trees and vegetation

Section 4.6 of the Planning Statement mentioned that “*All existing trees will be preserved and maintained, except two dead trees and one existing tree in direct conflict with the proposed access road, which is in poor form and not suitable for transplant*”. It seems that large scale of tree removal and vegetation clearance would not be necessary, but the following issues need further clarification:

- Width of pathways within the proposed application site should be specified. This is to evaluate if there would be potential damage or truncation on tree roots during construction of various pathways.
- Figure 2 of Sewerage Impact Assessment (SIA) revealed that the proposed alignment of sewer and manholes might be in direct conflicts with some retained trees (Figure 1). It is necessary to evaluate if the number of felled trees has been



under-estimated, or if any other proper measures would be adopted, such as alternative alignment, designation of tree protection zone, etc..

- SIA also revealed that the proposed discharge point of treated effluent lies within in direct conflict with T20 (*Cleistocalyx nervosum*) and close to T19 (*Ficus microcarpa*). That discharge point also lies within the proposed tree protection zones of both trees (Figure 2). We are concerned if works related to that discharge point would be commenced within these tree protection zones, how the tree protection zones can ensure proper protection of both trees.
- Figure 4.5 indicated that most of the pathways would be paved in wood deck. It would be grateful if the applicant can specify if concrete footing and column would be adopted. We hope to ensure that the design of pathway would not cause any damage on existing trees.

2. Impact on water quality

Here are main concerns on water quality due to the proposed application:

- Section 6.4.10 of Ecological Impact Assessment (EcoIA) mentioned that “*As there will be not any catering facilities within the Academy, so the sewage flow will only be from toilets and simple hand-washing facilities*”. We hope to clarify if other sources of wastewater, such as baths, sinks and other sanitary fitments, would arise from operation.
- We assume that only one on-site sewage treatment plant (STP) would be provided near the proposed plant nursery. However, Section 6.2.4 of EcoIA stated that the proposed visitor centre would also provide “*a sewerage treatment plant*” as well. Please clarify.
- Preliminary details such as maintenance program, contingency plan for STP during operation were not included in this stage. They should be included to ensure no any effluent discharge would be properly managed.
- The Preliminary Environmental Review Report should supplement further on potential water quality impacts and corresponding mitigation measures during construction phase.



- It was noted that “event lawn” would be proposed in the application site. It is not sure if any chemical pesticides would be used for maintenance purpose. What we worry is that surface runoff containing pesticide would finally enter into the adjacent pond and natural stream and cause water pollution.

3. Potential light disturbance on firefly

Tai Po Kau Nature Reserve has long been one of the fireflies hotspots. From literature review of the EcoIA report, 15 species of firefly have been recorded in Tai Po Kau, with four considered endemic to Hong Kong. From the field survey result, 8 species of firefly were recorded with three within the application site. As fireflies are well known of using bioluminescence for sexual communication, we are concerned that the proposed application would bring additional artificial light at night, and then disrupt their flash signals and pose adverse impact on courtship behavior.

While we understand from the EcoIA report that adverse effect caused by artificial light at night on fireflies would not be high, the following issues need further clarification:

- It seems that methodology for fireflies survey, such as date, time, weather condition, etc., has not been clearly mentioned in the EcoIA.
- Section 6.4.13 of the EcoIA mentioned that “*The amount of artificial lighting at night will also be limited to a minimum for safety concern and will be turned off when not in use. The lighting source to be installed will be equipped with full cut-off or shielded fixtures to minimize light glare and trespass, and will be aimed only towards the ground rather than to the sky or any sensitive habitats nearby*”. It is also necessary to specify clearly details of lighting equipment and facilities, such as their location, types of lighting facilities to be used, and so on. Such details are important to evaluate the effectiveness of the proposed measures to prevent glare disturbance, and consider if additional mitigation measures are required.
- As tent camping ground would be provided in the proposed application site, we assumed that there would be provision of overnight accommodation, and generation of artificial light during night time is not unusual. However, it seems not clear what source of glare disturbance would be generated in the proposed



tent camping ground area during operation phase, and how it affects fireflies in both the application site and study area.

- 2 firefly species of conservation importance have been recorded according to recent field survey. However, they have not been identified in the Habitat Map (zoom-in) with MLP and with Indicative Locations of Faunal Species of Conservation Importance Record.

4. Habitat map

The habitat map provided is quite broadbrush and, to a certain extent, not accurate in reflecting the existing ecological conditions of the application site. For example, Section 4.3.13 of the EcoIA described the condition of “Village/Developed Area” and mentioned “*a terrace of abandoned farmland*”, “*The abandoned farmland is heavily overgrown with weedy and ruderal vegetation*”. It is doubtful why abandoned farmland was not included in the habitat map. Meanwhile, Figure 5.1 of Landscape Master Plan (Tree Survey and Treatment Plan) revealed that some trees were located at the western periphery of the application site (Figure 3). This part of area is still vegetated with trees and should not be classified as “Village/Developed Area” in the habitat map.

The above would greatly affect the identification and evaluation of ecological impact brought by the proposed application. We strongly recommend that the applicant should prepare the habitat map again.

5. Details of management and operation plan

Current details of site management and operation are still quite piecemeal. To better identify sources of environmental impacts and suggest measures to minimize or mitigate potential environmental disturbance, it would be grateful if there are further elaboration on various items. Initially we would highlight some of them:

- Crowd control

Section 4.5 of the Planning Statement mentioned that “*The proposed TPK Nature Academy will open Mondays to Sundays including Public Holidays, from 9am to 6pm (except for overnight programmes and special activities such as morning bird watching). The proposed development is anticipated to accommodate a maximum of 400 visitors daily in various sessions with about 10*



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site staff in full operation. The number of visitors will be controlled as advance registration before visiting will be required”.

From the above, we would assume that there would be peak seasons in the proposed nature academy with influx of visitors, public tours, education and recreation activities within certain period. We worry that how effective crowd control plan can be during these peak seasons as potential human disturbance can be disastrous. Moreover, even there were attempts to control numbers of visitors within the application site, it would also be necessary to consider indirect impacts on adjacent Tai Po Kau Reserve, especially during peak seasons with more visitors and commercial/eco-tours to Tai Po Kau Nature Reserve.

- **Work programme**

No details have been provided for the work programme. Dates of commencement and completion of proposed uses in the application site, for example, should be clearly mentioned so that these can help determine duration of various environmental impacts during construction and operation phase.

- **Tent camping ground**

Details of the proposed tent camping ground, such as size, design, activities involved in the area, any excavation and leveling works required, guidelines for campers, waste collection, etc., are limited. It would be hard to evaluate if all potential environmental disturbance can be minimized and mitigated during both construction and operation phase.

Since any camping grounds in areas close to Special Area and areas of conservation importance would probably be a model for some other rural areas or Country Park enclaves in future, it should be very cautious to avoid any undesirable precedent to be set in this case.

- **Any universal accessibility/barrier-free design**

From various layout plans attached in the Environmental Review, accessible facilities such as carpark, toilets and changing rooms were provided. We hope to clarify if additional accessible facilities or barriers-free design would be incorporated in future operation. More details on this is necessary as this might have implication on development footprint on various proposed uses.



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Here we would especially raise concerns on the pathways in the proposed application site. According to the “Universal Accessibility: Best Practices and Guidelines”¹, “*Width of walkways shall not be less than 1050mm clear. Best practice is to provide 1200mm wide walkway to enable a wheelchair to turn, and preferably 1500mm to allow two wheelchairs to pass*”. If such standard would be applied to the pathways, it might be necessary to further evaluate if there were direct impacts on retained trees and their tree roots and how such impacts can be avoided or mitigated.

- **Odour and noise impact of the proposed STP on visitor centre and plant nursery**

The proposed visitor centre and plant nursery would not be identified as sensitive receivers in the preliminary environmental assessment. However, the proposed STP lies close to these facilities, especially plant nursery. While main welcoming space, multi-purpose activity area, working area would be placed in these facilities, we expect that those users, including both visitors and site staffs, might be subject to disturbance of the STP, such as odour and noise impact. These should be tackled in site management and operation.

Yours faithfully,

Ng Hei Man

Campaign Manager

The Conservancy Association

¹ Architectural Services Department (2004). Universal Accessibility Best Practices and Guidelines.
<https://www.archsd.gov.hk/archsd/html/ua/06a-chapter6.pdf>

Figure 1 The proposed alignment of sewer and manholes (marked in red) might be in direct conflicts with some retained trees

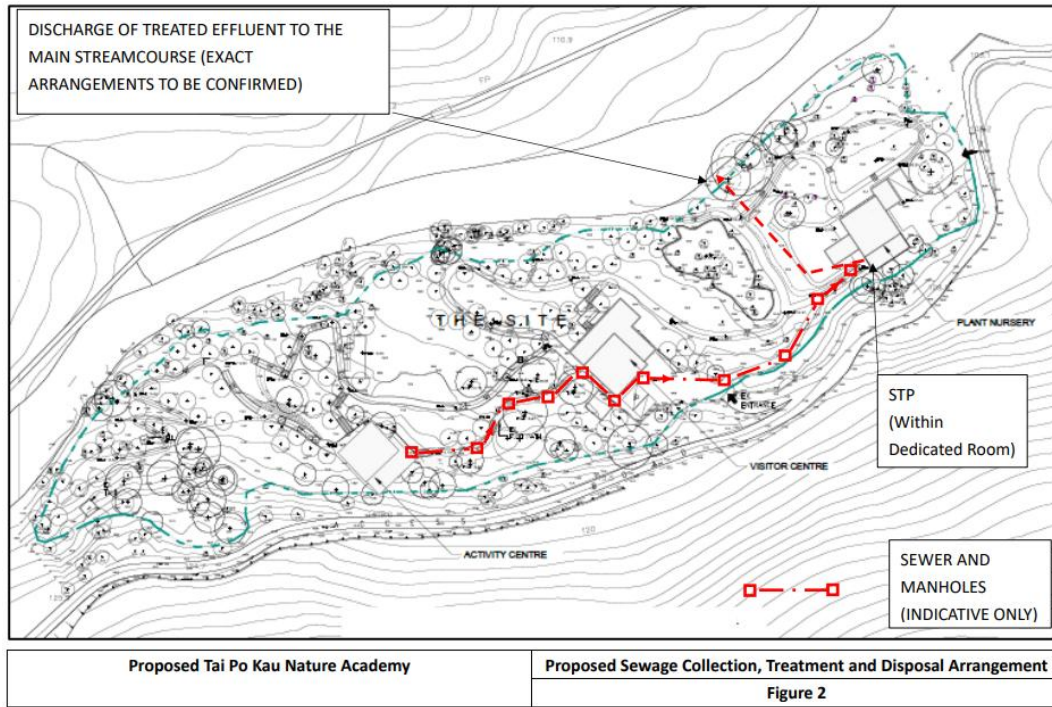


Figure 2 The proposed discharge point of treated effluent lies within in direct conflict with T20 (*Cleistocalyx nervosum*) and close to T19 (*Ficus microcarpa*). That discharge point (marked in red) also lies within the proposed tree protection zones of both trees

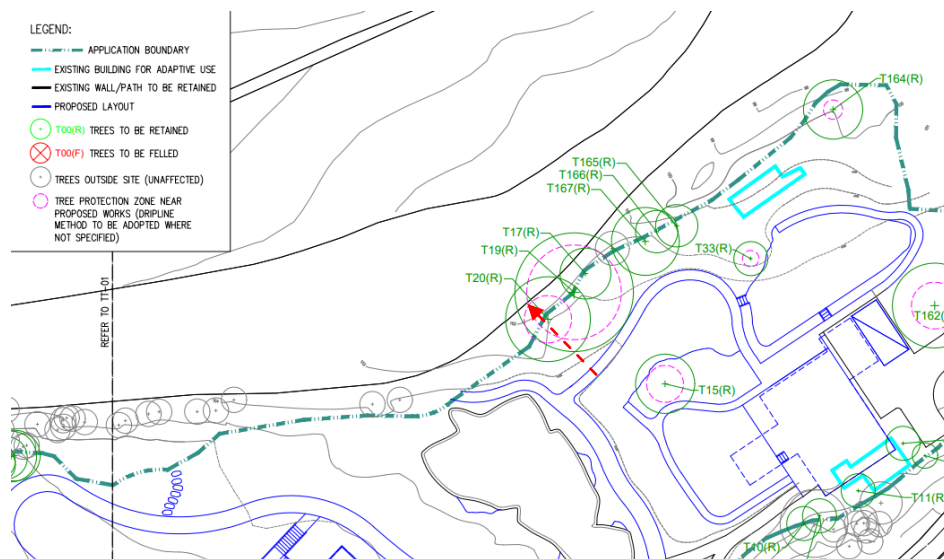


Figure 3 Tree Survey and Treatment Plan revealed that some trees (circled in red) were located at the western periphery of the application site

