



BY FAX AND E-MAIL

**Town Planning Board Secretariat**

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3 November, 2015

Dear Chairperson and Members,

**Broad Development Parameters of the Applied Use/Development in respect of  
Application No. A/YL-MP/247**

Green Power, a local charitable green group, would like to draw Town Planning Board's attention to our concerns about the captioned application for the proposed wetland restoration area cum low density residential development (the Proposal) in Lot Nos.3054 S.BRP and 3055 in DD 104 near Yau Mei San Tsuen, Yuen Long which is located within Wetland Conservation Area (WCA) and Wetland Buffer Area (WBA) of Mai Po and Inner Deep Bay Ramsar Site.

**Improper Use of Emergency Vehicular Access**

1. Yau Pok Road should be an emergency vehicular access (EVA) for the Ngau Tam Mei Drainage Channel (NTMDC) which is designed for neither normal vehicular commutation nor coping traffic load generated by future residential developments.
2. However, the Proposal takes this EVA as the sole pedestrian and vehicular access. We wonder whether Yau Pok Road is able to accommodate the traffic load generated by the Proposal.
3. Green Power is gravely concerned that the Proposal will constitute a public misconception that EVAs of drainage channels serve as infrastructure for private developments, that may induce unnecessary channelization of natural rivers/streams and construction of associated EVAs.
4. We noticed that there are 105 blocks of domestic houses and 174 private car parking spaces (which exclude 6 visitor parking spaces) proposed in the residential development. We consider that the number of private car parking spaces is unnecessarily high compared to the number of proposed domestic houses (1.7 to 1) that will encourage excessive use of private cars and generate additional air pollution, noise nuisance, traffic overloading to the EVA.

**Calculation of Wetland Habitat**

5. In Table 39 of the Ecological Impact Assessment Report, the "wetland habitat total" of "Existing Habitat" (in 2008) is 3.0 ha, which comprises 1.2 ha pond, 0.9 ha Marsh, 0.2 ha reed and 0.7 seasonally wet grassland. That of "Recommended Option" is 3.8 ha which is equal to the whole proposed project area (8.1 ha) minus the Development Area (4.3 ha).

6. These calculations imply that the grassy bund, wooded bund, bamboo clump and gravel (about 0.8 ha in total) in the “Proposed Habitat” are counted as wetlands. We would like the Administration to clarify the justification(s) for counting the areas of grassy bund, wooded bund, bamboo clump and gravel as wetlands. Also, has/have the same justification(s) been adopted in the other applications under Town Planning Ordinance, especially in Deep Bay area?

### **Drainage and Sewerage**

7. In order to protect the Wetland Restoration Area(WRA) against pollution from sewage and surface runoff in both construction and operation phase,
  - (a) surface runoff from the residential development should be prevented from flowing towards the WRA by adjusting the topography of the project site, so that the catchments of WRA and residential portion should be separated. Physical barriers such as concrete bunds for diverting surface runoff, both temporary and permanent, should not be considered in the first place or as the only measure to serve this purpose.
  - (b) sewage and/or stormwater outfalls, and sewer pipelines should not be located within the catchment of WRA to avoid direct discharge and leakage of polluted water or surface runoff.
8. The information regarding the location, footprint of the drainage system for the residential development has not yet been provided. Therefore, the potential impacts of the drainage system on the WRA, water quality of NTMDC, Mai Po Nature Reserve and Deep Bay SSSI cannot be assessed.
9. The Proposal includes an interim sewage treatment plant (STP) serving the residential development. Except this interim STP, no optional sewerage serves the proposed residential development currently. Any incidents of breakdown, power failure or overflow of sewage may lead to discharge of large amount of untreated domestic sewage to the neighbouring channels causing water pollution, hygiene risk and odour nuisance.
10. To our understanding the interim STP will be operated privately of which stability and efficiency are still in doubt. We would like to clarify the qualification of future operator(s), designed lifespan, discharge points (including overflow and emergency) and emergency support of the interim STP.
11. We are concerned that any discharge of water pollutants in the proposed project area will affect Mai Po Nature Reserve and Inner Deep Bay which is about 1 km and 3 km respectively away. Any discharge from the proposed project site to NTMDC will flow downstream to the new channel of Kam Tin River and then reach Inner Deep Bay which is a “Site of Special Scientific Interest (SSSI)” and Ramsar Site, Mai Po Nature Reserve and Mai Po Marsh SSSI.
12. Depending on the concentration and toxicity the pollutants and tidal action, these ecologically important sites are highly vulnerable to the discharge from the proposed project, both in construction and operation phase. Inner Deep Bay Ramsar Site and Mai Po Nature Reserve are internationally recognized site for migratory birds. Significant numbers of waterfowl also frequently forage in Kam Tin River new channel. The water pollution impacts on these ecological sites should be assessed with evidences.

### **Encroachment to WRA**

13. The 5-metre buffer zone should embrace the whole length of the boundary between residential area and the WRA to provide an effective shielding of WRA from human disturbance.

14. The ecological corridor located to the southeast of the proposed project site connects the proposed WRA to an existing pond and drainage channel. Its width should not deter the passage of wildlife as it will be encroached by the residential portion of this proposed project to the west and “Wetland Buffer Area” to the east which can probably be developed.

#### **WRA**

15. WRA should be established and stably operated in prior to the commencement of the construction of residential development of the proposed project.
16. Construction materials, chemicals, fuels and vehicles should not be stored, transported and pass WRA except for the purpose of establishment and maintenance of WRA.
17. The ecological function of WRA should be compatible to the ecology, landscape and hydrology of the whole Deep Bay Area. It may also reinstate the lost and/or shrinking microhabitats in Deep Bay area if necessary.
18. The land ownership, operation and maintenance of WRA should be independent of the residential area of the proposed project. WRA should be sustainably funded.
19. The original topsoil of the proposed project site should be kept to repave the WRA if it is beneficial to the establishment of WRA in ecological consideration. The water-depth of WRA should be designed to suit the foraging behavior of different waterfowl.
20. As the WRA is enclosed by human development except to the north, sensitivity of birds or other fauna towards human disturbance should be taken into account when selecting them as the target species, if any, for WRA. Human disturbance to the WRA should be strictly controlled in construction and operation phase.

#### **Waste Dumping**

21. As huge amount of C&D wastes from the proposed project are needed to be disposed of, enforceable measures should be in place during the construction phase to prevent these C&D wastes being dumped in farmlands and fishponds.

For any inquiries, please contact the undersigned at Green Power (Tel: 3961 0200, Fax: 2314 2661, Email: lkcheng@greenpower.org.hk)

Thank you very much for your kind attention.

Yours faithfully,



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