



**BY EMAIL ONLY**

**Director of Environmental Protection**

EIA Ordinance Register Office

Environmental Protection Department

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14 August, 2019

Dear Sir/Madam,

**Project Profile for  
Revitalisation of Tai Wai Nullah  
and  
Revitalisation of Fo Tan Nullah**

Green Power, a local charitable green group, would like to draw your attention to our concerns about the above-captioned Project Profiles (PP) for revitalization of man-made and channelized river courses in urbanized Sha Tin New Town.

*Revitalisation of Tai Wai Nullah*

1. Key works items (a), (b), (c) and (f) stated in Section 3.1.2 of PP for Revitalisation of Tai Wai Nullah are supported in principle.
2. We concur “*to promote a vibrant freshwater ecosystem and biodiversity*” in Tai Wai Nullah. However, landscaping practices to introduce “*greening elements*” which cannot adequately address the ecological restoration of channelized river. Also, riffles and pools, which are natural drainage features of upper courses, are not necessarily beneficial and/or adequate to the lower course at the “*section of the Nullah near the existing Lower Shing Mun Reservoir Dam*”.
3. Contrarily, we observed that many silt trap structures in existing man-made river channels support higher diversity of aquatic flora and fauna which may be due to lower flow velocity, larger water surface area, accumulation of natural sediment and hydrological connection to adjoining natural river courses.
4. Therefore, such ecological and hydrological settings mentioned in paragraph 3 above should be seriously considered in “*modification of the existing energy dissipation structure*” to promote native aquatic and riparian biodiversity of Tai Wai Nullah.
5. While “*resurfacing the existing concrete nullah bed with growing substrate*”, the selection of substrate should take account of hydraulic stability, aquatic ecology and maintenance in addition to “*introduction of greening vegetative elements on the sloping embankments*”.
6. We agree “*to collect dry weather flow and convey it to the Sha Tin Sewage Treatment Works*” to

eliminate polluted effluent discharging to Tai Wai Nullah. However, the associated works should not impose adverse environmental and ecological impacts during both construction and operation phase.

7. Regarding the ardeid night roosting site (Section 3.2.5), ecological impact assessment should include the role of existing and revitalized Tai Wai Nullah to the foraging, roosting and breeding habits of egrets and herons. Particular measures should be formulated to protect against human disturbance and damages to the roosted trees (if any), including damages to tree roots by earthworks. Disturbing construction procedures of the proposed project should be restricted to non-breeding period if breeding activity is spotted.
8. Ecological impacts of downstream aquatic communities and loss of existing aquatic and riparian habitats during construction phase (Section 3.2.5) should be critically assessed in view of their ecological status and benefits. Commonly, aquatic and riparian habitats of local man-made and channelized water channels are occupied by exotic invasive species or terrestrial species rather than native aquatic and riparian species.
9. Obstruction structures/features of migration of aquatic organisms, particularly fish, should be removed to restore the ecological connectivity of Tai Wai Nullah to Shing Mun River and Tolo Harbour, if it does not bring about any insurmountable environmental or hydraulic impacts.
10. Land contamination assessment should be conducted in areas neighbouring to Tai Wai Nullah as such contamination and associated polluted groundwater may drain into Tai Wai Nullah in operation phase if channel runoff is connected to groundwater. Also, proper measures must be in place during construction phase to avoid any environmental impacts of any contaminated soil, however excavated or not.
11. Inventories and data of existing water quality, discharge of point sources and non-point sources of water pollution, stormwater and surface runoff should be collected and assessed. Locations, flood capacity and operation details of Dry Weather Flow Interceptor (DWFI) should be specified. The scenarios of overflow of DWFI should be considered to address any impacts on water quality, aesthetic and landscape, ecology and maintenance in operation phase.
12. Runoff generated from the site during construction phase should be prevented from polluting river channels. We opine that related mitigation measures should be incorporated into the specifications of the works contract.
13. Generation, transportation and disposal of construction-and-demolish(C&D) and other solid wastes should be under stricter control. The mitigated measures to prevent illegal and environmentally vandalistic dumping of wastes generated from the proposed projects should be considered to be incorporated into the specifications of the works contract.
14. The design of both pedestrian (ground level) and channel part of the project should deter littering behaviour and avoid refuse from discarding into the channel to promote water-friendly culture.
15. Please refer to paragraph 18 and 19 which should also be applicable in Revitalisation of Tai Wai Nullah.

Revitalisation of Fo Tan Nullah

16. Key works items (a), (b), (f) and (g) stated in Section 3.1.2 of PP for Revitalisation of Fo Tan Nullah are supported in principle. Our above-mentioned comments in paragraph 2 to 14 are applicable.
17. Regarding Section 5.2.5, we opine that “*greening vegetation elements along the bed and embankment*” may not be necessarily “*provide compensation for the loss of habitats, tree-felling and riparian vegetation resulting from the proposed works*”. In fact, it is quite a common misconception in planning developments and works. Please also refer to paragraph 2 above.
18. We agree that excavation works carried out within or close to the nullah bed would be carried out during the dry seasons, and upstream non-tidal river flow will be maintained during the construction phase.
19. Greening design should incorporate with the aims of alleviating heat island effect

Thank you very much for your kind attention. For any inquiries, please contact the undersigned (T: 39610200, F: 2314 2661, Email: [lkcheng@greenpower.org.hk](mailto:lkcheng@greenpower.org.hk)) or Mr. Henry Lui (Email: [henry@greenpower.org.hk](mailto:henry@greenpower.org.hk)) at Green Power.

Yours faithfully,



CHENG Luk-ki  
Director  
Green Power