

Ms. CHENG Mei Sze, Maisie
Director of Environmental Protection
(E-mail: eiaocomment@epd.gov.hk)

By email only

6 July 2021

Dear Ms. Cheng,

**Comments on the Project Profile for the Proposed Residential Development at Lot
No. 2 in D.D.228 Near Pak Fa Lam Road, Sai Kung (ESB-334/2021)**

The Hong Kong Bird Watching Society (HKBWS) would like to express our objection to project profile (PP) of the proposed residential development and its associated road works (the project). We are highly concerned about the significant ecological impacts on the ecologically important sites and the undesirable precedent set by this project.

High ecological sensitivity of the project site

The project consists of residential development and road works along Pak Fa Lam Road. The project site is within sites of conservation importance as it falls within the Ma On Shan Country Park (MOSCP), Ho Chung Valley Site of Special Scientific Interest (SSSI) designated in 1979 and "Conservation Area" (CA) zoning under the approved Tseng Lan Shui Outline Zoning Plan No. S/SK-TLS/8. The project site is surrounded by dense and mature woodlands, which is clearly part of the well-recognized "*native woodland containing rare and protected flora*" of "*high*" ecological value¹.

According to our bird records during two visits in and near the project site in January and May of 2017, woodland dependent birds species were recorded, including Crested Serpent-Eagle (*Spilornis cheela*) classified as "Class II Protection" and "Near

¹ https://www.epd.gov.hk/epd/sc_chi/environmentinhk/eia_planning/sea2005/terr_table74a.html

Threatened” in China²³, Rufous-capped Babbler (*Stachyridopsis ruficeps*) of “Local Concern”⁴, Grey-chinned Minivet (*Pericrocotus solaris*) of “Local Concern”, Great Barbet (*Psilopogon virens*), Black Bulbul (*Hypsipetes leucocephalus*). The presence of these woodland birds and raptor indicate the mature woodlands in the area is in healthy condition, and should be strictly protected from habitat destruction, pollution and disturbance.

Significant ecological impacts and high risk of water pollution

Besides, the project site is mainly dominated with shrubland/woodland and it has a direct ecological linkage with the surroundings. We are highly concerned that all the works associated with the residential development during construction phase (i.e. land excavation, land filling, site formation, foundation works, superstructure works, transportation and storage of construction materials, set-up of temporary structures, rest room and toilet facilities for workers, etc) and the construction works related to road upgrade would adversely affect sites of conservation importance and all the surrounding ecological sensitive receivers including birds and their habitats due to the unavoidably increased direct and indirect disturbance.

The project site also falls within WSD Lower Indirect Water Gathering Ground (WGG) and is close to the nearby natural rivers. The introduction of residential development with sewage discharge would impose high risk of pollution to the WGG, the nearby rivers and the organisms and wildlife which utilizes the river. However, the project proponent only briefly stated that “*advanced sewerage treatment system will be installed to ensure the wastewater will be treated to the required standard before re-use/discharge*” while without indicating the corresponding facilities (i.e. septic tanks system or other on-site sewage treatment plant) in the text or tentative master layout

² List of Wild Animals Under State Protection (promulgated by State Forestry Administration and Ministry of Agriculture on 1 January, 2021)

³ Zhigang Jiang, Jianping Jiang, Yuezhao Wang, E Zhang, Yanyun Zhang, Lili Li, Feng Xie, Bo Cai, Liang Cao, Guangmei Zheng, Lu Dong, Zhengwang Zhang, Ping Ding, Zhenhua Luo, Changqing Ding, Zhijun Ma, Songhua Tang, Wenxuan Cao, Chunwang Li, Huijian Hu, Yong Ma, Yi Wu, Yingxiang Wang, Kaiya Zhou, Shaoying Liu, Yueying Chen, Jiatang Li, Zuoqian Feng, Yan Wang, Bin Wang, Cheng Li, Xuelin Song, Lei Cai, Chunxin Zang, Yan Zeng, Zhibin Meng, Hongxia Fang, Xiaoge Ping. Red List of China’s Vertebrates[J]. Biodiv Sci, 2016, 24(5): 500-551.

⁴ Fellowes et al (2002)

plan. We consider it is important to provide the information about the type of treatment system, the associated structures and works in the current PP, so as to adequately identify all the potential ecological impacts.

Set undesirable precedent to the developments within country parks

The project is not in line with the Country Parks Ordinance (Cap.208) to “*protect the vegetation and wild life inside country parks and special areas*” and contradict with the listing of SSSI. However, there are other private lands nearby, which are within MOSCP, SSSI and WWG, are also well-vegetated and with direct linkage to the surrounding woodlands. The increased accessibility to this originally remote and less disturbed land due to provision of upgraded road would greatly increase the human disturbance and the development threats in the vicinity. We are therefore concerned the approval of current PP would set an undesirable precedent to future similar development applications within MOSCP and also in all the other country parks in Hong Kong, and nullify the protected area system.

The HKBWS hopes that our comments would be taken into consideration and the current PP would be rejected. Thank you for your kind attention.

Yours sincerely,



Wong Suet Mei
Conservation Officer
The Hong Kong Bird Watching Society