



Miss TSE Siu Wa, Janice, JP  
Director of Environmental Protection  
(E-mail: eiaocomment@epd.gov.hk)

By email only

31 January 2022

Dear Miss Tse,

**Comments on the Project Profile for the proposed Route 11 (Section between Yuen Long and North Lantau) (ESB-352/2022)**

The Hong Kong Bird Watching Society (HKBWS) would like to raise our concerns regarding the captioned Project Profile (PP). As the proposed alignment of Route 11 will pass through and is close to ecologically sensitive areas, we are highly concerned about the proposed highway development would lead to direct, off-site and cumulative adverse impacts on the ecologically sensitive areas and wildlife in the vicinity. Our comments are as follows:

**Potential impacts on Tai Lam Country Park and natural habitats within Green Belts**

According to the Layout Plan for Preliminary Alignment of Route 11 of the PP, most of the works within Tai Lam Country Park will be the underground tunnelling works, while part of it will pass through the catchment of Hung Shui Hang Irrigation Reservoir. We are concerned the impacts of alteration of hydrology and aquatic ecology within the Country Park would not be properly identified and assessed in the EIA report.

It is stated in the PP that “*direct impacts from minor aboveground works at the fringe of Tai Lam Country Park might be inevitable*”, and “*the proposed tunnel portals will be located near the Tai Lam Country Park, and some minor associated works might be deployed at the fringe of the country park*”. It is unclear what does “the fringe of Tai Lam Country Park” refer to, as there is no delineation of fringe of Country Park under the Country Park Ordinance. We consider the applicant should clarify if the “fringe”





refers to areas within Country Park or within the Green Belt zoning, and whether if there will be any minor aboveground works or minor associated works within Tai Lam Country Park.

Referring to the Google Earth aerial photos and the Statutory Planning Portal 2, the proposed alignment of the elevated/at-grade road of Route 11 will pass through various terrestrial habitats, including mature and secondary woodlands, farmlands, streams and rivers within Green Belt zonings. The Tsing Lung Bridge, which will be associated reclamation of about 2.7 ha for the construction of bridge towers, would also cause direct loss in marine and intertidal habitats.

The project proponent should adequately identify all the terrestrial and marine ecological sensitive receivers, so as to avoid any unnecessary impacts on them.

#### Potential impacts on the ardeid breeding colony

A total of at least 25 nests were recorded at egretty in Ma Wan in 2021, comprising of Great Egret (*Ardea alba*), Little Egret (*Egretta garzetta*) and Black-crowned Night Heron (*Nycticorax nycticorax*)<sup>1</sup>, in which their nesting and roosting sites are regarded as of ecological concern due to their restrictedness<sup>2</sup>.

Given that the maximum foraging range of ardeids can be up to 2 to 4 km while the concerned egretty is located about 1.5km away from the project area, the potential impacts on these ecologically important egrettries should not be overlooked. With this distance, the environmental impacts including loss in potential foraging ground, disturbance to flight paths, noise and light pollution during the construction and operation phase of the proposed bridge would unavoidably deteriorate the habitat quality of the egretty and adversely affect the breeding birds and their breeding success.

<sup>1</sup> Anon, 2021. Summer 2021 Report: Egretty Counts in Hong Kong with particular reference to the Mai Po Inner Deep Bay Ramsar Site. Report by The Hong Kong Bird Watching Society to the Agriculture, Fisheries and Conservation Department, Hong Kong Special Administrative Region Government

<sup>2</sup> Fellowes et al.: Fauna of Conservation Concern (2002)





Precautionary approach should be taken during planning and design stage (i.e. the alignment, underwater/sea bridge, etc). Impacts on the nesting colony, the breeding ardeids and their flight paths should be assessed. Careful phasing of construction program should be considered to avoid/minimize disturbance impacts during the breeding season of ardeids, which is between March and August inclusively.

HKBWS hopes that our comments would be taken into consideration. Thank you for your kind attention.

Yours faithfully,  
Wong Suet Mei  
Conservation Officer  
The Hong Kong Bird Watching Society

