

Proposed Field Study/Education/Visitor Centre-Lots 1, 2, 4-8 in D.D. 33 and Adjoining Government Land in Tai Po Kau, Tai Po, New Territories (Application No. A/TP/684) – Response to Comments from AFCD on Further Information (6)		
	Comments from AFCD, (Officer: Ms. June LEUNG; Te1: 2150 6953)	Response from Applicant
1	<p>Section 7. Some of the information provided in the first 2 paragraphs is misleading. Although AFCD has no intention to encourage recreational activities in TPKNR, which is managed for nature conservation and nature education purposes, five way-marked walks, an outdoor study centre, information board, interpretation panels and picnic sites are provided at suitable areas of the nature reserve for public use. Also, AFCD currently offers nature excursion (nature interpretation programme) and fixed point narration for the general public, and countryside exploration programme for primary school at TPKNR, The applicant is encouraged to take note of the above when developing their education programmes in a synergistic approach.</p>	<p>Noted. It is indeed hoped that the proposed Nature Academy would drive synergy together with AFCD and contribute to nature education. The first 2 paragraphs of Section 7 are now rephrased as follows:</p> <p>At present, the overall education gain for general visitors to TPK is relatively low, due to the limited amount of educational hardware and activities (although it is duly noted that in TPK, AFCD has provided and managed hardware and infrastructures suitable for education, and has also been offering some education activities. Nonetheless, it is identified that there is a lack of supporting facilities; a sharing platform for collaboration opportunities for ecology/environmental science researchers; indoor venues for schools/NGOs to conduct education activities before entering the Nature Reserve; and resources to facilitate exploration of biodiversity for the general visitors.</p> <p>In fact, in one of our previous meetings with AFCD, the department did mention that they believe our work will be a good complement to the Reserve. It is agreed in the meeting that AFCD's work and the proposed Nature Academy would</p>

		produce a synergistic contribution to nature education.
2	With the uncertainties associated with the need and the extent of the G.I. and NTHMM in TPKNR resulting from the subject project, it is premature to conclude in Para. 4 of the F.I. that “no direct impacts to any recognised sites of conservation importance will occur”, “there will be no loss of any natural or semi-natural habitats” and “no direct loss or harm to any species of conservation importance are anticipated”. In fact, the validity of the construction phase ecological impacts, the suitability of the proposed mitigation measures as well as the conclusion made in the F.I. (i.e. “with the green building design mindful and effective construction management, the insignificant impact on the surroundings can be further minimized”) are subject to review.	Agreed. While the G.I. will only be carried out in detail design stage after the approval from Town Planning Board is sought, given the small scale of works to be carried out in the application, it is anticipated that there should be insignificant impact. Nevertheless, it is agreed that the validity of the construction phase ecological impacts, the suitability of the proposed mitigation measures as well as the conclusion made in the F.I. (i.e. “with the green building design mindful and effective construction management, the insignificant impact on the surroundings can be further minimized”) are subject to review.
3	Under Para.4, Proposed Mitigation Measures, we would suggest removing the sentence “The volume of construction traffic is considered acceptable and would not generate significant, additional impacts to the Tai Po Kau Nature Reserve; this has also been agreed with AFCD.” which is misleading. AFCD has not agreed to the volume of traffic nor the significance of the impacts to TPKNR.	Noted. The sentence in Section 4 Construction Phase Ecological Impacts and Proposed Measures is revised as follows:  To minimise the construction phase disturbance to Tai Po Kau Nature Reserve and the associated wildlife, the use of heavy machinery and construction vehicles will be avoided and minimised when and where possible. Any use of heavy machinery and construction vehicles will be scheduled outside of the wet season during which breeding of most terrestrial

		<p>fauna takes place. Major construction activities shall be carried out in the dry season (from November to March) only. There will be no more than 5 vehicle trips per day during construction period. To minimise disturbance to the wildlife, the maximum length of vehicle used would be 5.7m, where normally the size for construction vehicles is longer than 9m. It is considered that the volume of traffic generated from the construction activities would not generate significant additional impacts to the Tai Po Kau Nature Reserve.</p>
4	<p>Specific comments on the submission date 21 June 2023</p> <p>Relevant sections of the “Ecological Impact Assessment Report (issue 7)” (dated 3 April 2023) are extracted for reference:</p> <p>Para.7.7.1 “The number of visitors to the Academy will be strictly controlled through an advance booking mechanism. The number of visitors as well as the number of educational activities taking place within the Academy can be controlled and adjusted according to the peak seasons and peak hours to minimise any disturbance to wildlife”. With these mitigation measures in place, Para. 6.4.6 state that “the potential increase of visitors to TPKNR due to the operation of the Academy is not considered significant”. Also, according to Para. 6.4.12, the current estimation of sewage generation during the operation phase is based on the prediction of up to 200 visitors per day with visitor control</p>	<p>AFCD’s concern on the over-spilling impact onto Tai Po Kau Nature Reserve is noted.</p> <p>We share with the views of the Town Planning Board members that we would like to open up to more people for effective nature conservation education, however, we are largely constrained. We had, therefore, tried to propose that the general public could walk-in with pre-registration at the gate, to ensure the site would not be overcrowded.</p> <p>However, AFCD is worried that some people who could not be able to enter the Nature Academy might overspill and adversely affect Tai Po Kau Nature Reserve. Indeed, we are unable to estimate the number of possible visitors or their mode of travel / visit at this stage. Besides, the Nature Academy has a carrying capacity and an estimated visitor threshold for weekday and</p>

	<p>measure in place. It is noted from Para.7.7.3 that the sewage will be treated then discharged to the adjacent water course.</p> <p>The original intention of the visitor control measure is to mitigate the indirect disturbances during the operation phase the TPKNR and wildlife, and not only for the prevention of over-crowding within the application site itself. Given that it is now proposed to open the centre to the public without the need for prior reservation, any visitors who are unable to enter the centre when the visitor count is exceeded will likely remain outside the centre at TPKNR. Please review how this mechanism can control visitor spill over disturbances to TPKNR. Moreover, depending on the season of the opening of the centre, the 3-month review period in the first year of operation may not be able to reflect the true conditions/ visitor flows of the centre at full operational strength and during peak seasons. The system of prior registration for visitors can also serve the purpose of visitor flow analysis and is a precautionary measure against unexpected visitor load, large walk-in groups attracted by the centre the TPKNR. It is recommended to review the effectiveness of the proposed visitor control measures in minimising visitor impacts to TPKNR. In addition, if visitor loads are expected to be increased, relevant sewage treatment volume may need to be revisited.</p>	<p>weekends. We are also aware that TD is concerned about the possible traffic impact and possible illegal parking that would be brought by the individual visitors, and that is the reason we agreed that only pre-registration by institutions/organizations will be allowed so that the traffic generation can be managed and controlled.</p> <p>The applicant emphasizes on the quality of learning experience by the visitors. In the early stage of the operation, there would be some uncertainties in the visits and the team would be cautious in operation and management to ensure the surrounding areas will not be affected. In view of the above circumstance and due to management and operational consideration, we would like to maintain our previous proposal of pre-registration by organizations only. Nevertheless, when opportunities arise, for example, after the Nature Academy is fully developed with stable visitors, we would then be able to assess the demand, mode of visit and mode of transport. At that time, we would be able to review the mode of opening and will liaise with relevant departments to seek their consent for opening up the site for public visit.</p>
R-to-C	Please revise the first 2 paragraphs to better focus on the location	AFCD's comments are noted that they have no intention to

No. 1	and the anticipated function of the subject centre as well as the synergy and net gain to be introduced to the site. As mentioned in our previous comments, AFCD has no intention to encourage recreational activities at Tai Po Kau Nature Reserve (TPKNR). The existing provisions within TPKNR are considered adequate from management and visitor services perspectives.	encourage recreational activities at Tai Po Kau Nature Reserve. Yet we would like to stress that the TPK Nature Academy is located outside TPK Nature Reserve and the purpose of the Nature Academy is for environmental education and conservation, but not recreation.
R-to-C No. 2	Given that the scope and extent of the G.I. and any possible NTHMM works in TPKNR remains unconfirmed and that the area is a dense natural woodland, the claim that there should be insignificant impact is unfounded. As we have repeated in previous comments, any G.I. and NTHMM within TPKNR resulting from the application should be evaluated as a whole when considering the ecological impacts of the application. There is currently no detail on the extent of G.I. and NTHMM and ecological impact assessment on works within TPKNR.	Noted.
R-to-C No. 4	For the sake of clarity, please indicate that no walk-in/ individual visitors to the Academy will be allowed in addition to "only pre-registration by institutions/organizations will be allowed". It is noted in the submission dated 19 June 2023 that special events such as collaborative workshops and showcase of artworks are proposed, and it is anticipated that events such as opening ceremonies, exhibitions, educational festivals, ac- hoc activities/ regular on-site workshops would be held within the application site. It would seem that special events such as these would target	We would like to clarify that only pre-registration by schools/ institutions/organizations will be allowed. No individuals/walk-in visitors will be allowed. The events such as collaborative workshops and showcase of artworks, exhibitions, workshops and opening ceremonies (if any) will only target at schools/ institutions/organizations.

not only groups but also individual visitors. Given that pre-registration now only applies to organisations, the applicant should elaborate on visitor control measures to minimise disturbance to TPKNR and its wildlife, especially during peak seasons and during special events.

Moreover, the R-to-C acknowledges uncertainties in visitor numbers/ mode of transport but will only review the mode of operation "when opportunities arise" after the Academy is fully developed with "stable visitors". The applicant may wish to suggest a more definitive time frame as to when this is expected to happen. Given that TPKNR is a Special Area where recreational activities are not encouraged to minimise human disturbance, the applicant should err on the side of caution for nature conservation, and apply a cautious and gradual approach when attempting to increase visitor numbers to the site, rather than opening up the site all at once and waiting for disturbances and impacts to have occurred before reviewing and (re-)engaging visitor control measures

With regard to the review of the operation mode, we will take a cautious and gradual approach after the Nature Academy is fully developed. It is expected that the review will take place after one year after adequate experience is gained in both dry and wet season.