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香港觀鳥會
THE
HONG
KONG
BIRD
WATCHING
SOCIETY
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By email only

19 April 2016

Dear Sir/Madam,

Comments on the Planning and Engineering Study for Housing Sites in Yuen Long South
Stage 3 Community Engagement



The Hong Kong Bird Watching Society (HKBWS) would like to raise our concerns regarding the development in Yuen Long South (YLS). We consider a holistic conservation approach should be adopted, such that the egretty and its surroundings, the flight path of nesting ardeids and their feeding habitats are protected.

1. Importance of the egretty in Tai Tong

The egretty in Tai Tong has been actively used by Little Egrets (*Egretta garzetta*), Chinese Pond Herons (*Ardeola bacchus*), Eastern Cattle Egret (*Bubulcus coromandus*) for over ten years. It constantly has the second to third largest breeding colony of Eastern Cattle Egrets in Hong Kong, after Ho Sheung Heung and A Chau. The nesting colony supports an average of 18% of Hong Kong's total Eastern Cattle Egret breeding population.

In April 2014, our Egret Research Group discovered the former Tai Tong egretty was completely destroyed. However, at the same time, a new egretty was established closer to the YLS development area and a total of 17 nests were recorded¹. The Tai

¹ Anon, 2014. *Summer 2014 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

Tong colony is important as it is one of the two egretries with breeding records of Eastern Cattle Egrets in 2014. From the findings of our survey conducted in the summer of 2015, the total number of nests recorded doubled to 34². 11 nests of Eastern Cattle Egrets were recorded, which is the second largest colony in Hong Kong and accounts for one-fifth of total local breeding population of the species. Therefore, the egretty at Tai Tong is of high conservation importance.

2. Concerns on the egretty in Tai Tong

2.1 Updated data should be used for assessment

In the green groups focus group meeting held on 18 February 2016, we noted that the consultant has been conducting egretty surveys and has taken the egretty into consideration when adjusting the zonings of the plan. However, only the survey data for 2014 was presented at the meeting, which can be misleading to the attendees. As mentioned in the previous section, the number of nests in 2015 doubled when compared with that in 2014. We consider that updated survey data should also be included in the presentation to truly reflect the current situation and such data should also be included in the assessment for drafting the layout and zoning of the proposed development plan to ensure the egretty will not be adversely affected.

2.2 Inadequate protection of the flight line of nesting ardeids

As previously mentioned, the egretty at Tai Tong is particular important to the breeding population of the Eastern Cattle Egret. The major type of habitat used by this bird species for foraging are farmlands and grasslands, especially those with cattle and buffalos, as they feed on insects associated with these animals. To the north-west of the egretty is a large and continuous piece of active agricultural land, which would be preserved as a “Green Zone” under the current development plan. In the meeting held on 18 February 2016, the consultant already stated that one of the major flightline of nesting ardeids from the egretty is in a north-westerly direction and the birds would utilize the farmland in the “Green Zone”. We consider that the connectivity between the egretty and this large piece of farmland should be well-protected.

In the focus group meeting on 18 February 2016, the consultant stated that the plot ratio of the buildings in “Residential - Zone 2” north of the egretty ranges from 0.4 to

and Conservation Department, Hong Kong Special Administrative Region Government.

² Anon, 2015. *Summer 2015 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.

3.6, while the building height is from 2 storeys to over 20 storeys. Two stripes of “non-building area” (NBA) of approximate 30 metres wide in the north and south were reserved for the flight line of the nesting ardeids. However, the information given was too vague and the detailed height profile of the residential buildings was not presented or illustrated. We doubt the proposed housing development and the NBAs are sufficient to protect the flight paths of the nesting ardeids. It is also unclear if the Government and the consultant have considered how the layout of the proposed residential buildings can lower the disturbance caused to the flightline. For such development density around the egretty, we are highly concerned that the current proposal cannot maintain the connectivity between the egretty and the birds’ foraging ground, thus threatening the breeding success of the ardeids and they may eventually abandon the nesting site.

2.3 Protection of feeding habitats for nesting ardeids

Apart from protecting the egretty and its flight path, the feeding habitats of the nesting ardeids should also be protected. Currently, there are brownfields within the development area. We are concerned these open storage uses will be displaced to the agricultural lands/foraging habitats outside the development area because of the YLS development, thus damaging the foraging grounds for the nesting ardeids and reducing their breeding success. We consider that there should be a comprehensive plan to phase out these open storage uses or relocate them in proper places to avoid further habitat loss.

In addition, the Government and the consultant should provide information on the usage of feeding habitats by the nesting ardeids of the Tai Tong egretty (apart from the farmlands in the “Green Zone”), and if there will be any loss in these feeding habitats caused by the YLS development. A comprehensive ecological impact assessment should be conducted for the development area and its surroundings (e.g. 500 metre from the development area) in order to ensure the proposed development will not have adverse impacts on the nesting ardeids, their flight paths and their feeding habitats.

2.4 Similar case in Hung Shui Kiu New Development Area

In the nearby Hung Shui Kiu (HSK) New Development Area (NDA), there is also an egretty in the area. However, it received a very different attention from the egretty in the current YLS development. In HSK, the egretty is within a conservation zoning, and a corridor of about 70 metres wide (the width of the local open space, not including the NBAs reserved in the adjacent buildings) was reserved to maintain the

flightline of the egrets. Indeed there are still rooms for improvement for the proposed measures in HSK, but for an egretty of around 4 nests in 2015, we consider such approaches were quite reasonable. Back to the case in YLS, for an egretty of 34 nests in 2015 and one of the top three stable hold of Eastern Cattle Egret breeding population, we consider the currently proposed measures were inadequate to protect the egretty from the adverse impacts caused by the YLS development.

2.5 Include the egretty in the development area and cover with conservation zoning

We urge the Government to step-up its efforts in protecting the egretty as it is of local conservation importance and breeding is an important life stage of the egrets/herons. Currently, the new egretty in Tai Tong is currently covered by “Undetermined” and “Residential (Group C)” zoning, which neither are of conservation purposes. We are concerned any developments in the area would threaten the egretty. We consider that the egretty, its adjacent knoll and the adjacent stream together with its riparian zones should be included in the YLS development area and should be covered by conservation zoning(s) such as “Green Belt (1)” (GB(1)) or “Conservation Area” (CA), to avoid giving any false hope to the landowners that the egretty and its nearby areas could be used for development. Moreover, the habitats, streams and watercourses near the egretty should be enhanced and revitalized to protect the egretty and its surrounding habitats, which would also bring an ecological gain to the area.

2.7 Rearrange the development layout

To avoid the blockage of the flight path and to reduce the disturbance to the egretty, the “Special Residential - Public Rental Housing (with commercial)” zoning to the southwest of the egretty, which has a plot ratio of 4 to 5³, should be moved to a less sensitive area away from the egretty. The developments in the “Urban Living” area and “LOHAS Living” area should be rearranged such that there would not be any developments (e.g. housing and commercial developments) along the flight paths and around the egretty. The local and district open spaces and conservation zonings should be fully utilized to protect the flight paths of the nesting ardeids, and to maintain the ecological connectivity between the egretty, its adjacent knoll, the local and district open spaces, and the nesting ardeids’ feeding habitats (e.g. agricultural lands). These “ecological corridors” should be as wide as possible to reduce the disturbance to the flight line caused by the development. Setback with a stepped-height principle and the use of NBAs should also be adopted for the buildings adjacent to these “ecological corridors”, such that the building heights gradually decrease towards the corridor and the egretty. The maximum height of these

³ According to the plot ratio information provided on P.23 of the Stage 3 Community Engagement Digest.

buildings should not be more than the height of the knoll adjacent to the egretty. Moreover, the design of all buildings should be bird-friendly to reduce the risk of bird collision with buildings.

2.7 Phasing of the development

Breeding egrets are susceptible to disturbance by human activities. The presence of human disturbances close to nesting colonies may discourage ardeids from nesting⁴, or even lead to abandonment of their breeding areas or nestlings. As such, human activities should be limited in where the egretty is located, as well as the adjacent areas, particularly during the breeding season (i.e. March to August). Any construction works surrounding the egretty should not be conducted within this period of the year to avoid unnecessary disturbance to the nesting ardeids.

3. Agricultural lands in Yuen Long South

3.1 Importance of farmland to birds

Wet agricultural lands, both active and fallow, are important foraging grounds for waterbirds and wetland-dependent species, including species of conservation importance like Greater Painted-snipe (*Rostratula benghalensis*), Chinese Pond Heron (*Ardeola bacchus*), Red-billed Starling (*Spodiopsar sericeus*), as well as Zitting Cisticola (*Cisticola juncidis*)⁵. Freshwater wetland habitats and fallow wet agricultural lands are currently under-represented in the protected areas in Hong Kong and are vulnerable to destruction⁶. During our recent site visit to Yuen Long South, there are still active wet and dry agricultural lands in the area.

According to HKBWS bird records, approximately 293 species of birds are recorded in the agricultural lands of Hong Kong. This constitutes 55% of the total bird species in Hong Kong⁷ and 20% of the total bird species in China⁸. Among them, almost half of the species recorded (140 species) are regarded as of conservation importance. This indicates that the agricultural land in Hong Kong supports a high diversity of birds, thus should be adequately protected and managed.

⁴ Wong, C.L.C. and Woo, L.C.K. 2003. *Egretty counts in Hong Kong, with particular reference to the Mai Po Inner Deep Bay Ramsar Site: Summer 2003 Report*. The Hong Kong Bird Watching Society.

⁵ Wong, L.C., Lam, V.W.Y. & Ades, G.W.J. (eds.). 2009. *Ecology of the Birds of Hong Kong*. Kadoorie Farm and Botanic Garden.

⁶ Yip, J.Y., Corlett, R.T. and Dudgeon, D. 2004. A fine-scale gap analysis of the existing protected area system in Hong Kong, China. *Biodiversity and Conservation* 13.5: 943-57.

⁷ The total number of bird species in Hong Kong is 531.

⁸ According to the CBR Checklist of Birds of China v3.0 (2013), the total number of bird species in China is 1434.

It should be noted that the bird composition of waterbirds and wetland dependent bird species found in wet agricultural land is different from that in the wetlands of the Deep Bay area. Although there are some overlaps of the bird species in these two habitats, agricultural land should be seen separately as a unique habitat. The ecological value of the agricultural lands and the impacts of the development in Yuen Long South should be comprehensively assessed.

3.2 Threats to the agricultural lands in Hong Kong

For the past 10 years or so, the approval rate of small houses applications in “Agriculture” (AGR) zones is over 60%⁹, thus agricultural land is vulnerable to small house development. We are concerned the further loss of arable agricultural lands would lead to adverse impact on the farmland bird community.

3.3 Protection of agricultural land in Yuen Long South

We note that a large piece of agricultural land is preserved in the “Green Zone” in the development plan and is zoned as AGR. Under the current Town Planning system, an AGR zone has the planning intention of retaining and safeguarding good quality agricultural land for cultivation and agricultural purposes. We support genuine ecologically friendly cultivation of land. Other agricultural activities which involves paving of land and use of excessive nutrients/fertilizers/pesticides/insecticides should not be encouraged. Agricultural land should also be protected from other development threats. Therefore, we consider that the AGR zones in the development area should be replaced with a zoning that more accurately reflects its planning intention (i.e. AGR zone without small house development) or replaced with other conservation zonings (e.g. GB(1)/CA). This can help to secure land for sustainable agriculture, conservation and education, and to provide alternative public space to serve the need of local residents and public.

4. Sustainable drainage initiatives

We welcome the various sustainable draignage initiatives proposed in the development plan to improve the water quality and revitalize the watercourses in the YLS area. These measures may help the current developed areas to become more ecological- and environmental-friendly. Yuen Long South may potentially become a demonstration site for implementing sustainable drainage measures in developed areas, and for the education of the public about water, channels and natural streams in Hong Kong.

⁹ Annex of LegCo Question 17 (6 Feb 2013) - Land reserved for building New Territories small houses. Retrieved from http://gia.info.gov.hk/general/201302/06/P201302060426_0426_106939.pdf

Nevertheless, we would like to remind the Government that such measures are not the replacement of the conservation of streams and natural habitats. We consider that both nature conservation and revitalization of developed areas are important and should be done alongside.

The HKBWS hopes that our comments would be taken into consideration during the consultation process. Thank you for your kind attention.

Yours faithfully,

A handwritten signature in black ink, appearing to read 'Woo Ming Chuan', with a large, stylized initial 'W'.

Woo Ming Chuan
Conservation Officer
The Hong Kong Bird Watching Society

cc.
The Conservancy Association
Designing Hong Kong
Green Power
Kadoorie Farm and Botanic Garden
WWF – Hong Kong