Secretary, Town Planning Board 15/F, North Point Government Offices 333 Java Road, North Point, Hong Kong (E-mail: tpbpd@pland.gov.hk)



20 Feb 2014

香港觀鳥會 The Hong Kong Bird Watching Society

Since 1957 成立



國際鳥盟成員

Dear Sir/Madam,

Comments on the Draft Fanling North Outline Zoning Plan No. S/FLN/1

The Hong Kong Bird Watching Society (HKBWS) would like to raise our concerns on the draft Fanling North Outline Zoning Plan No. S/FLN/1.

Concerns on the Man Kam To Road egretry

Twenty nests comprising of Little Egret (*Egretta garzetta*) and Chinese Pond Heron (*Ardeola bacchus*) were recorded at the Man Kam To Road egretry in 2013¹. Under the draft Outline Zoning Plan (OZP), this egretry would be destroyed by the provision of weapons training division². Although the relocation of the egretry into the Conservation Area (CA) along the Ng Tung River has been proposed, there has not been any scientific evidence to prove that the relocation would be successful. Given that the choice of nesting locations for egrets depend on the availability of food source and level of disturbances nearby, there is no guarantee that the mitigation egretry provided in the CA zone will be used by egrets in the future. As such, we urge the Board to consider retaining the existing Man Kam To Road egretry by zoning it as CA.

Loss of agricultural land

Wet and dry agricultural land provide foraging and roosting opportunities for a diverse group of bird species including waterbirds, wetland-dependent species and farmland birds. This habitat type is becoming increasingly rare in Hong Kong due to development pressure of low-lying areas, this has resulted in the loss of suitable habitats for these birds³. Existing agricultural land at Ma Shi Po would be loss under the draft OZP as Ma Shi Po would be used for residential development. Although agricultural zoning has been proposed at Fu Tei Au (at the river mouth of Ng Tung River), there is concern that this area would not serve its intention of being used as agricultural land given the following reasons:

¹ Mai Po Inner Deep Bay Ramsar Site Waterbird Monitoring Programme 2013-14. Egretry Counts in Hong Kong with Particular reference to the Mai Po Inner Deep Bay Ramsar Site.

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² North East New Territories New Development Areas (NENT NDA) Information Digest. July 2013.

³ Ecology of the Birds of Hong Kong. Kadoorie Farm & Botanic Garden.

- 1. Parts of this area is developed land with existing infrastructure⁴ (Figure 1); and
- 2. A number of ponds and a mitigation wetland (Figure 1) exist there that would require filling. Filling of land/pond of 1.2 m or more would require planning permission from the Board which could be a disincentive for farmers to convert these water-bodies to arable land.

With these constraints, it is uncertain whether the proposed AGR zone would be used for farming purposes. According to the North East New Territories New Development Areas (NENT NDA) Information Digest (the Digest), "12 ha of land will be designated as AGR zone, in which existing farming practice could continue"². Based on the reasons mentioned above, the 12 ha as stated in the Digest is an over-estimation of the amount of agricultural land that will be present during the operation of the NENT NDA. The HKBWS urges the Board to retain the existing agricultural land of Fanling North as much as possible, especially the large patch of farmland at Ma Shi Po.

The HKBWS respectfully requests the Town Planning Board to consider our concerns on the draft Fanling North OZP. Based on the reasons above, we hope the Board will strength conservation measures in the OZP by retaining existing egretry and farmland.

Yours faithfully,

Jocelyn Ho Senior Conservation Officer Hong Kong Bird Watching Society

cc:

AFCD - Mr. Wong, Director of Agriculture, Fisheries and Conservation CEDD - Mr. Law, Chief Engineering/Project Division 2 Conservancy Association Designing Hong Kong Kadoorie Farm and Botanic Garden WWF – Hong Kong

⁴ EIA-213/2013 North East New Territories New Development Areas – EIA report. Habitat map Figure 13.5I



