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香港觀鳥會
THE
HONG
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BIRD
WATCHING
SOCIETY
Since 1957 成立

By email only

16 September 2015

Dear Sir/Madam,

**Comments on the Hung Shui Kiu New Development Area Planning and
Engineering Study – Stage 3 Community Engagement**

The Hong Kong Bird Watching Society (HKBWS) would like to raise our concerns regarding the Hung Shui Kiu (HSK) New Development Area (NDA).

1. Concerns on the San Sang San Tsuen Egretty

In 2015, four nests were recorded at the San Sang Sun Tsuen egretty¹, which comprises of Little Egret (*Egretta garzetta*) and Chinese Pond Heron (*Ardeola bacchus*). In the Stage 3 Community Engagement, we acknowledge the retention of the San Sang San Tsuen egretty and its associated flight path in “Green Belt” (GB) zones and open spaces, and high-rise housing estates were not planned adjacent to the egretty. However, the egretty is still situated in the “Logistics, Enterprise and Technology Quarter” and is next to “Other Specified Uses (Enterprise and Technology Park)” (OU(E&TP)) zones with a building height of approximately 10 storeys high. We are still concerned about the ecological impacts of the HSK NDA development on the egretty and its flight paths, as the development would lead to a change from ground-level operations to high-rise building developments in the area. A comprehensive ecological impact assessment should be conducted in order to ensure the proposed NDA development will not have adverse impacts on the breeding egrets and their flight paths.

Breeding egrets are susceptible to disturbance by human activities. The presence of human disturbances close to nesting colonies may discourage ardeids from nesting²,

¹ Findings from the HKBWS Egret Research Group from April to July 2015 for “Mai Po Inner Deep Bay Ramsar Site Waterbird Monitoring Programme 2015-16” of Agriculture, Fisheries and Conservation Department. Results have not been published as of the date of this letter.

² Wong, C.L.C. and Woo, L.C.K. 2003. *Egretty counts in Hong Kong, with particular reference to the Mai Po*



or even lead to abandonment of their breeding areas or nestlings. As such, human activities should be limited in the GB zone where the egret is located, as well as the adjacent "Amenity Area" and "Other Specified Uses (Electrical Substation)" (OU(ESS)) zones, particularly during the breeding season of the egrets (i.e. March to August). Any construction works at the OU(E&TP) zones or road works should not be conducted within this period of the year to avoid unnecessary disturbance to the breeding egrets.

The nearby Tin Shui Wai drainage channel is a foraging ground for the breeding birds of the San Sang Sun Tsuen egret. To avoid the blockage of the flight path, the "Local Open Space" zones to the north-east of the egret should be widened to at least the width of the two adjacent GB zones. Setback with a stepped-height principle and the use of non-building areas should also be adopted in the OU(E&TP) zones such that the building heights gradually decrease towards the GB and the open spaces. The design of the buildings should be bird-friendly to reduce the risk of bird collision with buildings.

2. Loss in Agricultural Land

In the Project Profile for the HSK NDA submitted to the EPD in 2011, it stated that "*an area of wet agricultural land covers approximately 20 ha in the southern part of the NDA. Although disturbed by farming activities and scattered buildings, the area provides a habitat for a number of bird and invertebrate species*"³. 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*)⁴. Freshwater wetland habitats and fallow wet agricultural lands are currently under-represented in the protected areas in Hong Kong and are vulnerable to destruction⁵. It should also 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 in bird species found in these two habitats, agricultural land should be seen separately as a unique habitat.

In the Stage 1 Community Engagement, it was identified that there were about 102.7 hectares of agricultural lands (13%) in the NDA⁶. In Stage 2 Community Engagement, only 1.3 % of the total area of the HSK NDA was reserved for agriculture use, which is approximately 10.7 hectares. Currently, in the Stage 3 Community Engagement, no agriculture land use is proposed. As such, the development of HSK NDA would lead

Inner Deep Bay Ramsar Site: Summer 2003 Report. The Hong Kong Bird Watching Society.

³ Section 4.5.2 of the HSK NDA Project Profile prepared by CEDD in 2011

⁴ 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.

⁵ 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.

⁶ 13% of the total area of the HSK NDA is agricultural land (790 ha). Figures are provided in p.5 and p.7 of the Stage 1 Community Digest.

to a loss of about 100 hectares of agricultural land and is contradictory to the New Agriculture Policy launched by the Government in December 2014, which is to promote the sustainable agricultural development in Hong Kong.

According to HKBWS bird records, there are approximately 293 species of birds which utilize agricultural lands in 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. Therefore, there should be compensation for the loss of habitats of significant ecological value (e.g., approximately 100 hectares of agricultural land, which includes at least 20 hectares of wet agricultural land) caused by the HSK NDA development. A comprehensive ecological survey should also be conducted to avoid adverse ecological impacts on sensitive habitats and species of conservation concern.

3. Misleading the general public caused by incomplete information provided in the community engagement

In the Stage 1 Community Engagement, seven types of ecological features were identified in the HSK area, including ponds, marsh, woodlands, compensatory wetlands, conservation areas, egretty, and agricultural lands; but not all of them were reflected in the Recommended Outline Development Plan (RODP) at the Stage 3 Community Engagement. Moreover, comparing the RODP with the current statutory zonings in the HSK area, GB zones are found within the NDA. It was not clearly explained why the ecological features (e.g. the marsh near Fung Kong Tsuen as identified in the Stage 1 Community Engagement Digest) were not included in the RODP, and if there were any compensation for the loss of GB zones (Figure 1). Since the commencement of the Stage 1 Community Engagement for HSK NDA, there has been some changes in the condition of the aforementioned ecological features (i.e. some habitats may have been disturbed) (Figure 2). It is uncertain if this is the reason for development at these places. If so, however, the RODP is likely to promote or facilitate “destroy first, build later” events. The project proponent should clarify and explain clearly our concerns as raised above. Since the general public is not fully informed and aware of the environmental and ecological “costs” of the zonings in the RODP (i.e. the loss of ecologically valuable habitats and GB zones), we are concern they may be misled in making comments on the HSK NDA development and resulted in biased views.

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

Yours faithfully,

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.



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cc.
The Conservancy Association
Designing Hong Kong
Kadoorie Farm and Botanic Garden
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Figure 1. Side-by-side comparison of 1) map with ecological features provided in the Stage 1 Community Engagement Digest (left), 2) the RODP in the Stage 3 Community Engagement (middle), and 3) the current zonings of the Outline Zoning Plans in the HSK area (right). The approximate boundary of the RODP is indicated in blue colour.

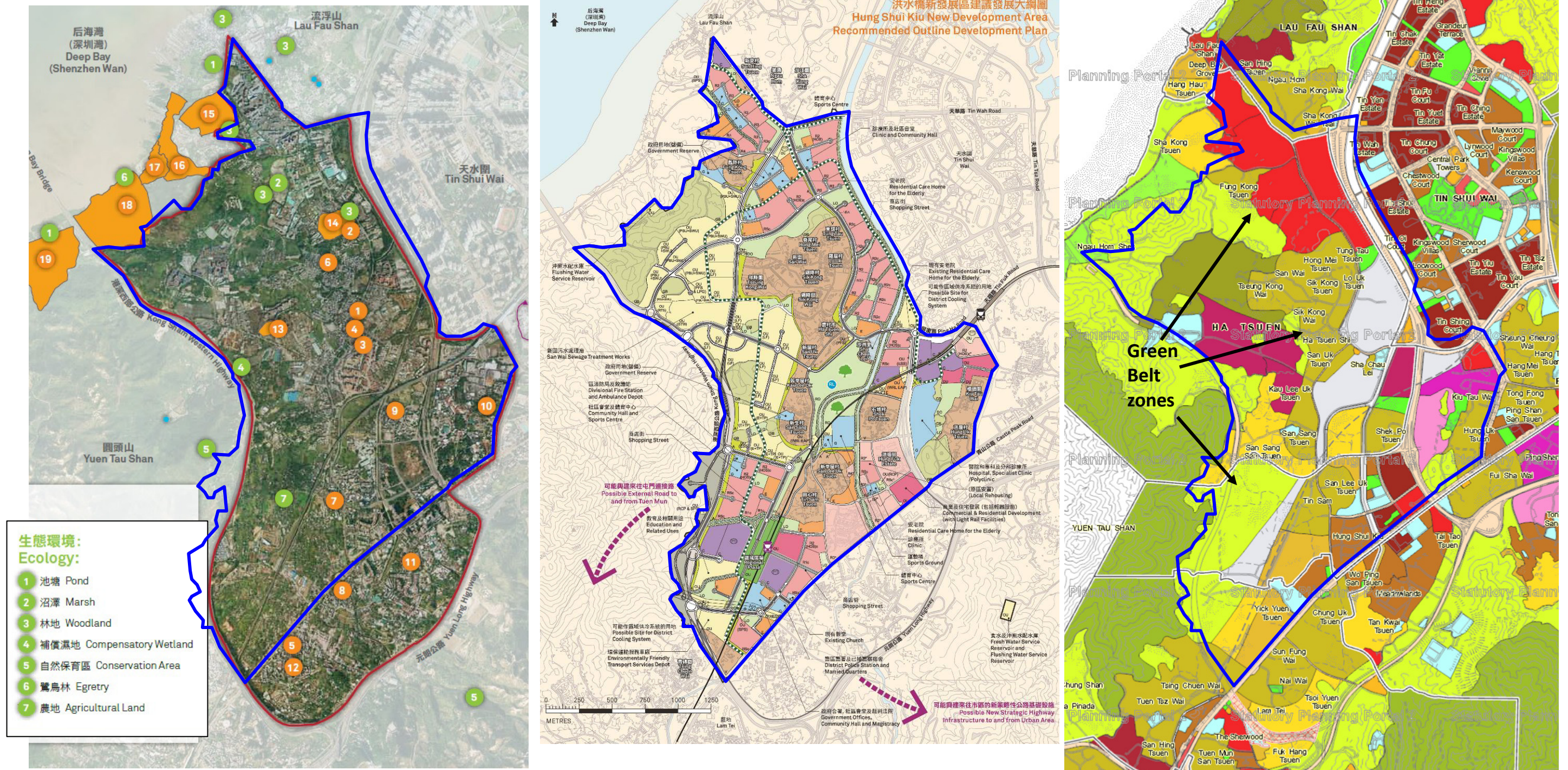


Figure 2. Take the habitats near Fung Kong Tsuen as an example. From earlier Google Earth aerial photographs taken in 2004, the area east of the village was mainly ponds and the area south of the village was well-vegetated (left). In 2011, the year when the Stage 1 HSK NDA Community Engagement commenced, the ponds were filled and some site formation was observed (middle). In 2015, when the Stage 3 Community Engagement launched, the affected and paved area further expanded (right).

