

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



By email only

香港觀鳥會

3 June 2016

THE
HONG
KONG
BIRD
WATCHING
SOCIETY

Since 1957 成立

Dear Sir/Madam,

Objection to the planning application of Proposed Wetland Restoration Area [("Wetland Habitat" use with excavation (re-profiling of fish ponds)] cum Low Density Residential Development ("House" use with filling of land) near Yau Mei San Tsuen, Yuen Long (A/YL-MP/247)

The latest supplementary information provided by the applicant did not address the concerns of the Hong Kong Bird Watching Society (HKBWS) as detailed in our letter submitted on 11 March 2016 to the Town Planning Board (Attachment 1). We consider that our concerns regarding the captioned planning application are still **valid**.



We would like to reiterate that flight lines 3 and 4 are at/close to the application site and they account for 40.1% of the total birds observed¹ (Figure 1). However, we consider that the width of the proposed ecological corridor is inadequate to maintain the ecological connectivity, particular for the movement of waterbirds and wetland dependent birds, between the Ngau Tam Mei Drainage Channel and the Deep Bay wetland system. Maintaining such ecological connection is a requirement listed in the Environment Permit No. EP-500/2015 granted for the proposed development, and should be strictly followed.

Therefore, the HKBWS respectfully requests the Town Planning Board to **reject** the current application. Thank you very much for your attention and consideration.

Yours faithfully,



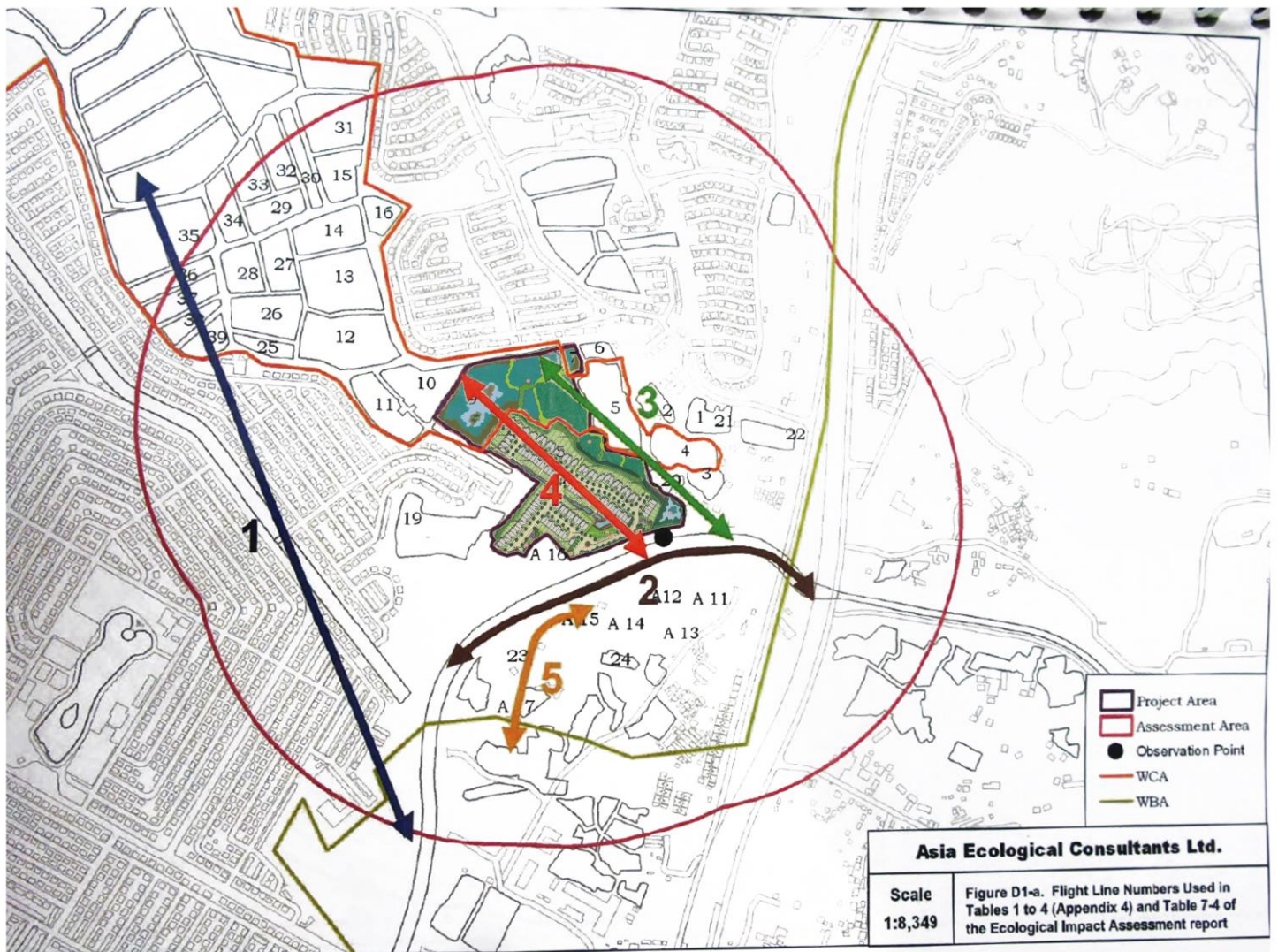
¹ Calculated from the data provided in Table 8-5 of the EIA for the

Woo Ming Chuan
Conservation Officer
The Hong Kong Bird Watching Society

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

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Figure 1. The Master Layout Plan of the proposed development overlaid with the location of the flight lines identified in the flight line survey.



Attachment 1

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



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11 March 2016

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Dear Sir/Madam,

Objection to the planning application of Proposed Wetland Restoration Area [“Wetland Habitat” use with excavation (re-profiling of fish ponds)] cum Low Density Residential Development [“House” use with filling of land] near Yau Mei San Tsuen, Yuen Long (A/YL-MP/247)

The Hong Kong Bird Watching Society (HKBWS) would like to maintain our objection to the planning application A/YL-MP/247 under Section 16 as our concerns expressed in the previous submission were not fully addressed.



1. Existing ecological connectivity at the application site

From the findings of the flight line survey (Figure 1), flight lines 3 and 4 are at/close to the application site and they account for 40.1% of the total birds observed¹. These findings indicate that the ecological corridor, which is located between the Ngau Tam Mei Drainage Channel (NTMDC) and the wider Deep Bay area via the application site and its immediate surroundings, is significant for waterbirds and wetland-dependent birds. Currently, the Project Site and its immediate surroundings consist of dry agricultural fields, grassland, shrubland and ponds. They form a continual natural vegetated area which provides an ecological corridor for the movement of birds and other wildlife.

2. The ecological connectivity is not adequately maintained

Referring to the replacement pages to Ecological Impact Assessment Report² submitted by the applicant in January 2016, it mentioned *“it is considered that 15m is adequate to ensure that hydrological linkages are retained and small terrestrial fauna (in particular herpetofauna) are able to move between habitat patches. In terms of large waterbirds, height of built-up structures, rather than the corridor width, plays a more critical role in influencing their flight lines. Hence waterbirds are not a key*

¹ Calculated from the data provided in Table 8-5 of the EIA

² Replacement pages to Ecological Impact Assessment Report, page 64 of 87.

concern in respect of the corridor as long as there is no development within the WRA".
We do not agree with the above.

From the proposed layout of Wetland Restoration Plan, Area 40 would have shallow and deep water habitats, which are likely to attract large waterbirds for foraging and roosting (Figure 2). The area may also act as a stepping stone for the movement of large waterbirds between the NTMDC and the Deep Bay Area. As the proposed ecological corridor is immediate adjacent to Area 40, we consider that large waterbirds would utilize the ecological corridor, particularly for those which use Area 40 as a stepping stone for their flight between Deep Bay and the NTMDC. We reckon that both the width of the ecological corridor and the height of built-up structures would affect the taking off/landing of birds and their flight lines.

Currently, the minimum width of the ecological corridor is 15 metres, and the height of the houses are taller than the adjacent housing development (i.e. Fairview Park) (Figure 3). We consider that the maximum height of the proposed development (as measured in mPD) should be the same as the adjacent Fairview Park, and the ecological corridor should be widened to avoid adverse impacts on the ecological connectivity between NTMDC and the Deep Bay area. The consultant also admits that widening the corridor would *"be of benefit to waterbird movement between NTMDC and the Deep Bay"*².

3. The justification of the minimum width of ecological corridor is not explained

The ecological corridor proposed by the applicant is of a minimum width of 15 metres, which was determined *"after a review of international and local practice"*². It is uncertain which literature reviews or local practices were referred to and their relevance to the current application. In the previous information submitted by the applicant in 2015, the minimum width was with reference to that of the buffer for the Ma Tso Lung Stream corridor in the Environmental Impact Assessment Report of the North East New Territories New Development Areas (EIA-213/2013). However, we consider that this is irrelevant to the current application, as the Ma Tso Lung buffer area is to protect a rare herpetofauna species, while the current application is in the Deep Bay area and waterbird flight lines are present. Birds have a higher mobility and can be of much bigger size than herpetofauna, thus a wider corridor should be provided.

4. The requirement of the Environment Permit should be followed

According to Section 2.5 of the Environment Permit No. EP-500/2015, *“the Permit Holder shall review the development layout and widen the ecological corridor with a view to maintaining adequate ecological connection between Ngau Tam Mei Drainage Channel and the Deep Bay wetland system”*. This ecological connection should not be limited to *“hydrological linkages...and small terrestrial fauna (in particular herpetofauna)”*². Large waterbirds should also be taken into consideration. We would also like to point out that the “Recreation” (REC) zone to the east of the Project Site, which is currently un-developed and still vegetated, should not be relied on to form a part of the proposed “ecological corridor”. The general planning intention of an REC zone is not for conservation and many permitted/maybe permitted uses would introduce more human disturbance into the area (e.g., barbecue spot, holiday camp, cable car route and terminal building). Therefore, the minimum width of the ecological corridor should be further widened to maintain this ecological connection between NTMDC and the Deep Bay wetland system according to the requirement of the Environment Permit.

As the proposed development would affect the ecological connectivity between NTMDC and the Deep Bay wetland system (i.e. between Wetland Buffer Area and Wetland Conservation Area), the HKBWS considers that the current application is not in line with the Town Planning Board Guideline No. 12C, which is to protect the ecological integrity of the wetlands in the Deep Bay area. Therefore, we urge the Board to **reject** the current application.

Yours faithfully,



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Figure 1. The location of the flight lines identified in the flight line survey

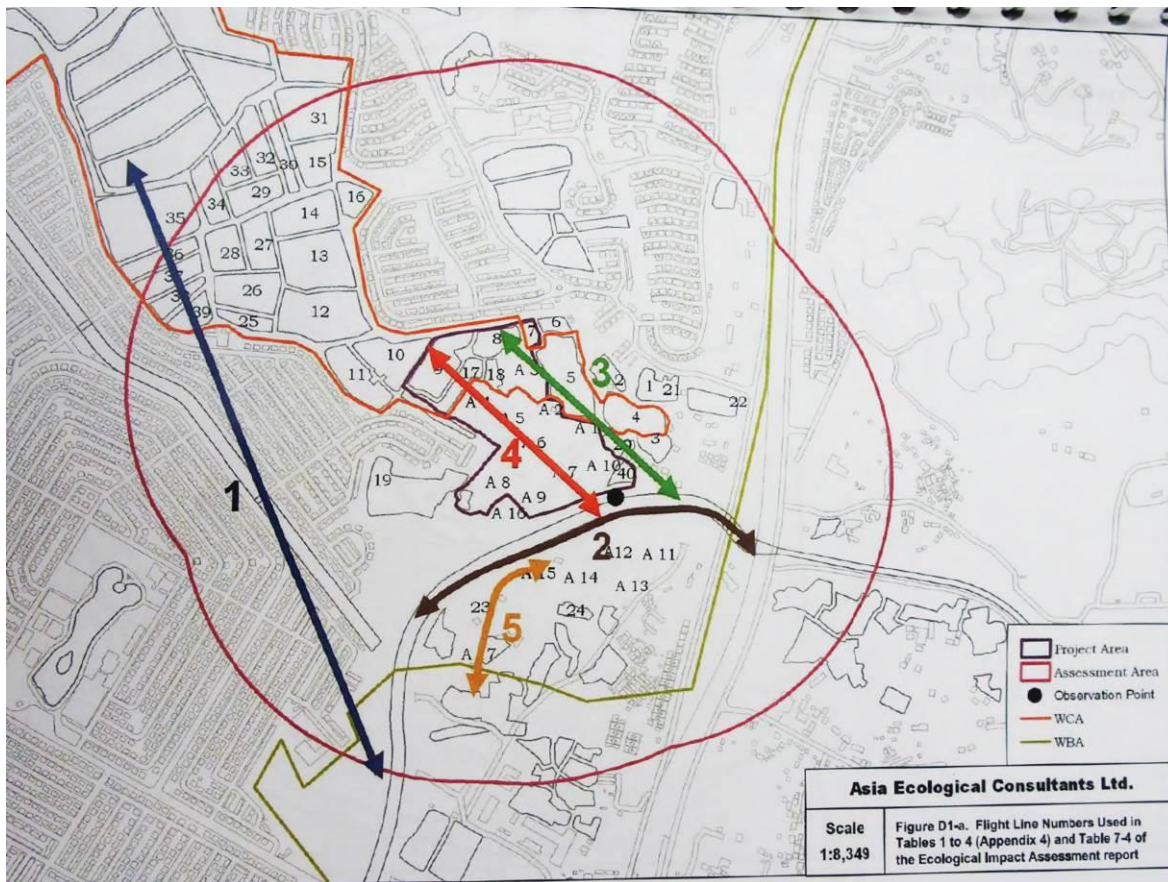


Figure 2. The proposed layout of Wetland Restoration Plan (Figure 8 of the Ecola)

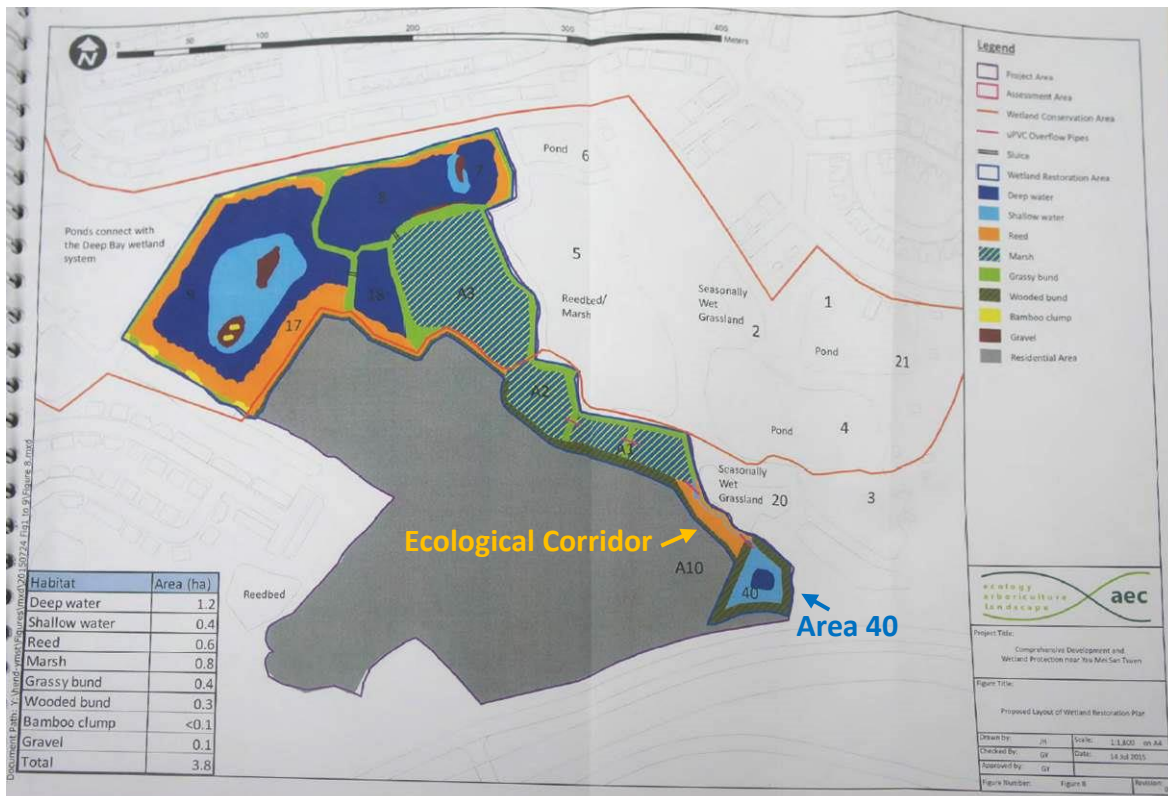


Figure 3. A cross-section diagram showing the building height of Fairview Park (left-hand side) and that of the proposed residential development (right-hand side). The proposed development is higher than the existing residential development.

