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The Conservancy Association

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Town Planning Board
15/F North Point Government Offices
333 Java Road
North Point
Hong Kong

By e-mail: tpbpd@pland.gov.hk

Dear Sir/Madam

Re: Comments on the Section 16 Application No. A/YL-MP/247

The Conservancy Association (CA) OBJECTS to Section 16 Application No. A/YL-MP/247.

1. Effectiveness of the proposed ecological corridor

Flight line 4 is completely within the development site while Flight 3 is located close to the east boundary of the development site (Figure 1). These two flight lines are the major flight lines utilized by waterfowls such as Great Egret, Little Egret and Chinese Pond Heron. These two flight lines would be significantly affected by the proposed development without appropriate mitigations.

In response to this concern, the applicant claimed to follow the requirement of Environmental Permit (EP) to expand the ecological corridor between Ngau Tam Mei Drainage Channel and the Deep Bay wetlands from a proposed width of 9-19m¹ to a minimum width of 15m. However, according to the requirement of EP, the project proponent shall “*review the development layout and widen the ecological corridor with a*

¹ Please refer to Section 2.9 of Comprehensive Development and Wetland Protection near Yau Mei San Tsuen EIA report

view to maintaining adequate ecological connection between Ngau Tam Mei Drainage Channel and the Deep Bay wetland ecosystem". The slight increase in the width of the ecological corridor needs further justification.

2. Buffer Planting

From Figure A.9 of Visual Impact Assessment, it was noted that no visual mitigation measures are proposed between the southeast edge of the development site and Area 40 which is the wetland restoration area in both construction and operation phase. Referring to the Landscape Drawing of this area (Figure 2), some trees have been planted but failed to reach 3 storeys high (i.e. the proposed houses including carpark and basement). We are doubtful if Area 40 would be then exposed to human disturbance which would undermine the effectiveness of the proposed ecological enhancement measures in Area 40.

Despite the provision of tree/plant lists for buffer planting, CA is concerned about that how long the trees take to form close canopy for screening function. Additional information on this is needed.

3. Impact on Black-faced Spoonbill

According to the EIA report of the Proposed Residential Cum Passive Recreation Development within "Recreation" Zone and "Residential (Group C)" Zone at Various Lots in DD 104, Yuen Long, N.T., 6 records of Black-faced Spoonbill (BFS) were once noted in Ngau Tam Mei Channel near the application sites. (i.e. within the Assessment Area of the captioned project) in December 2010. As mentioned in the EIA report of Comprehensive Development and Wetland Protection near Yau Mei San Tsuen the captioned planning application, this Channel "*has become more important for wetland birds since the water management regime changed since the 2008 wet season*"². The ecological survey which is conducted between 2007 and 2008, might not reflect the usage of BFS in this Channel in associated with the development site.

Supplementary information on the bird flight line is added to evaluate linkage between the Channel and the wider Deep Bay wetlands through the Assessment Area³. Flight Lines of BFS, however, has not been shown in both this approved EIA report and the existing EcoIA of the planning application. BFS is listed as "Endangered" under the IUCN Red List and China Red Data Book, and of "Potential Global Concern" in Fellows *et al.* (2002)

² Please refer to Section 8.7.2.2 of Comprehensive Development and Wetland Protection near Yau Mei San Tsuen EIA Report

³ Please refer to Section 8.7.2.3 of Comprehensive Development and Wetland Protection near Yau Mei San Tsuen EIA Report

so that impacts of any development on this globally endangered species need careful assessment. CA opined that provision of more details on this concern is necessary for consideration of this planning application.

Yours faithfully
Leung Tak Ming
Campaign Officer

Figure 1 Non-breeding season flight line of egrets



Figure 2 Landscape Section D (Annex B – Landscape Drawings) of Landscape Design Proposal. The proposed tree planting buffer cannot screen out disturbance from the house with maximum 3 storeys including carpark and basement

