

Secretary, Town Planning Board
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香港觀鳥會
THE
HONG
KONG
BIRD
WATCHING
SOCIETY

Since 1957 成立

22 Aug 2014

Dear Sir/Madam,

Objection on planning application for Proposed Residential Development, Filling and Excavation of Land at Nam Sang Wai, Yuen Long (A/YL-NSW/233)

The Hong Kong Bird Watching Society (HKBWS) would like to raise an objection to the planning application for A/YL-NSW/233 under Section 12A based on the following reasons:



國際鳥盟成員

Inadequate baseline ecological surveys and impact assessment

Rapid ecological assessments (REAs) were conducted a total of three times in January and February of 2014. This amount of survey effort is inadequate in providing a representative data set for a comprehensive ecological impact assessment (EcolA).

In regards to the avifauna surveys, data obtain from the months of January and February would only cover a portion of the over-wintering months. This method neglects the autumn (as early as late August to November) and spring (March to April) migratory months where the bird species diversity in Hong Kong is high as migrant species spot-over as a temporary resting location. As such, the current avifauna list provided in the EcolA only represents the over-wintering bird composition of the application site and study area, which cannot be considered as representative.

The surveys also completely neglect the entire wet season when herpetofauna, butterflies and dragonflies are most active. This is reflected upon the survey results of low species diversity for these fauna groups where only one species of herpetofauna (invasive species, Red-eared Slider *Trachemys scripta*), one species of dragonfly (Wandering Glider *Pantala flavescens*) and three species of butterflies (Common Grass Yellow *Eureme hecabe*, Indian Cabbage White *Pieris canidia* and Pale Grass Blue *Zizeeria maha*) were recorded. According to the habitat map, marsh, ponds, mitigation wetland, watercourse, secondary woodland and agricultural land are found within the 500m Study Area¹ (Figure 1). These habitat types, especially

¹ Figure D2 of the Ecological Impact Assessment

marsh, mitigation wetland, watercourse and agricultural land are primary habitats for herpetofauna and dragonflies and some butterfly species, whilst secondary woodland also serves as primary habitat for certain species of butterflies (Figure 1). The lack of wet season survey has led to an underrepresented species composition for these faunal groups. Therefore the impacts to the unidentified species (those that are inactive during the dry season when the surveys were conducted) especially those that utilize the marsh and watercourse habitats adjacent to the application site has not been assessed.

The survey period of the EcolA has failed to meet the requirements of the Town Planning Board (TPB) Planning Guidelines No. 12C. According to this guideline, "*field investigation normally covering a period of not less than 12 months should be included to provide baseline information of, and to study effects on, existing wildlife habitats, flora and fauna, and their seasonal changes.*"² **Given the sensitive location of the application site and the applicant's failure to identify the seasonal changes from their current surveys, comprehensive surveys for the period of more than 12 months must be required.**

Impact to Tung Shing Lei Egretty

Tung Shing Lei egretty is the sixth largest egretty in Hong Kong and has been actively used by Little Egrets (*Egretta garzetta*) and Chinese Pond Herons (*Ardeola bacchus*) for over ten year. In 2013, 55 nests were recorded, making up 7.3% of the total ardeids nests in Hong Kong³. The application site falls within the foraging range⁴ of the Tung Shing Lei Egretty and is located just 500 m away from the egretty. The noise and human disturbances impact during the construction and operation phase of the residential development would deteriorate the habitat quality of the egretty and the surrounding natural habitats. This would reduce the breeding success of the breeding birds.

Impacts to Great Cormorant Night Roost

The Great Cormorant night roost at Nam Sang Wai is a regionally important roosting site, supporting between 30-60% of the Deep Bay population. In 2013, the HKBWS recorded 6,035 individuals of Great Cormorant utilizing this site⁵. This night roost is

² Section 6.8 – TPB PG No. 12C

³ Anon 2013. Summer 2013 Report: Egretty Counts in Hong Kong with particular reference to the Mai Po Inner Deep Bay Ramsar Site. Report by Hong Kong Bird Watching Society to the Agriculture, Fisheries and Conservation Department, Hong Kong SAR.

⁴ Ardeids forage between 2 and 4 km within their nests

⁵ According to January counts of roosting Great Cormorant 2005-2013. The number of roosting Great Cormorants in Nam Sang Wai ranges from 3030 to 6035 while the Deep Bay population ranges

located approximately 600 m away from the application site (Figure 2) and would be subject to light disturbances during the operation phase of the development. We are concerned about the deterioration of habitat quality of this regionally important night roost arising from the development, which would lead to the abandonment of the roost.

Requirements of TPB PG-No. 12C

The application site is located within the Wetland Buffer Area (WBA). Whilst, the intention of the WBA “is to protect the ecological integrity of the fish ponds and wetland within the Wetland Conservation Area (WCA) and prevent development that would have a negative off-site disturbance impact on the ecological value of fishponds”⁶. An increase in development density within the WBA would not protect the ecological integrity of the fish ponds with the WCA. Instead, it would degrade the habitat quality of the WCA by reducing the buffer area of natural and undisturbed habitats extending the edge effect impacts from developments further into the Deep Bay area. The development proposed in the application is not in-line with the requirements of the TPB PG-No. 12C.

Cumulative impacts have not been assessed

Cumulative impacts of other planned and potential future developments have not been assessed. Other development projects including residential development under planning application Y/YL-NSW/1, Nam Sang Wai cycle track and supporting facilities, Tung Shing Lei Proposed Residential Development, filling and excavation of land and Sha Po residential developments have already been proposed and no assessments have been done to investigate the magnitude of impact from the cumulative loss of wetland habitats and construction and operation phase disturbances.

The HKBWS is concerned about the irreversible impacts to the ecological integrity of Deep Bay from these projects and we respectfully requests the Town Planning Board to reject the current application under review. Thank you for your kind attention and consideration.

Yours faithfully,

from 8736 to 11144.

⁶ Town Planning Board PG-No. 12C – Town Planning Board Guidelines for Application for Developments within the Deep Bay Area Under Section 16 of the Town Planning Ordinance



Jocelyn Ho
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cc:

AFCO – Ms. Eva Yau, Nature Conservation Officer (Yuen Long)
Conservancy Association
Designing Hong Kong
Kadoorie Farm and Botanic Garden
LandsD – Mr. Lily Chiu, District Lands Officer (Yuen Long)
WWF – Hong Kong

Figure 1

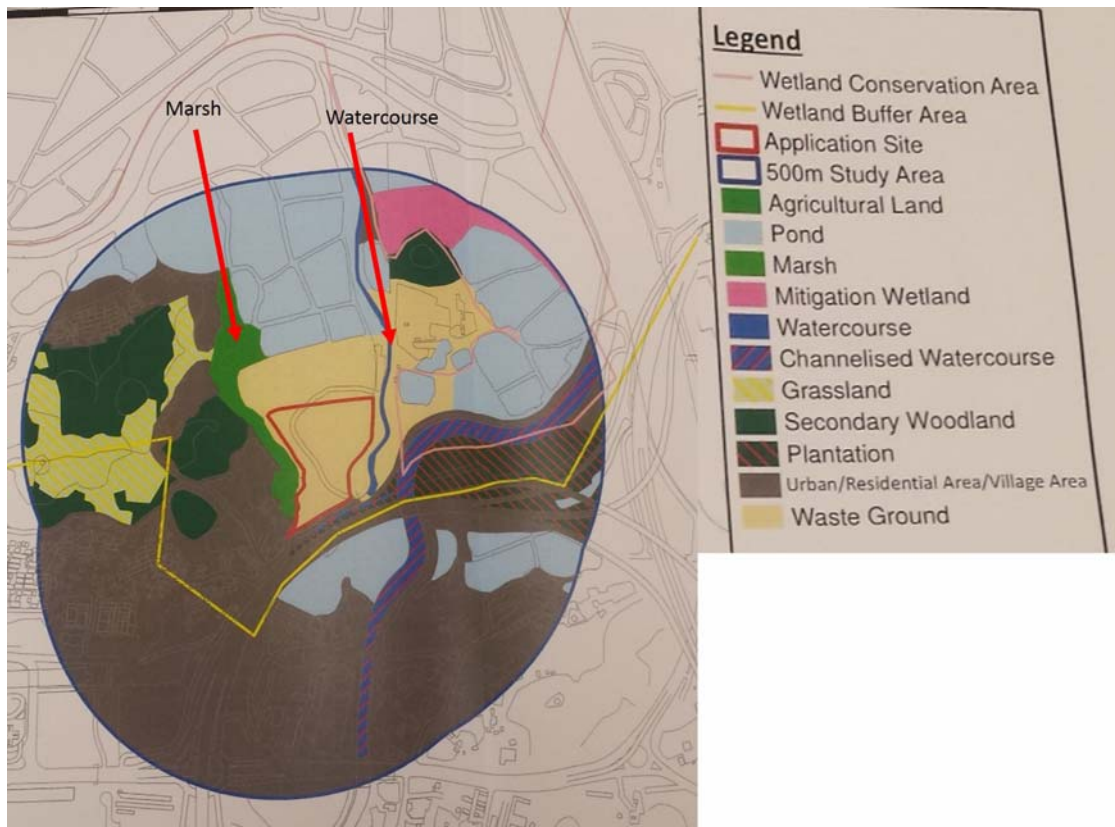


Figure 2

