

長春社 since 1968

The Conservancy Association

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22nd December 2015

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- NSW/233

Despite further submission of a revised drainage impact assessment with proposed mitigation measures on 30th November 2015 and 1st December 2015, the applicants had not provided enough justifications to ease our concerns. Therefore, the Conservancy Association (CA) OBJECTS to Section 16 Application No. A/YL-NSW/233.

1. Landscaped Area Plan lacks scientific support

There are no updates on the proposed Landscaped Area Plan from the further information submitted on 13th July 2015.

According to Landscaped Area Plan in Annex D7, the project proponent claimed that the Landscaped Area with Natural Habitat and Water Feature (LA) would "form an integral part of the buffer proposals between development and the adjacent habitats and will help mitigate for potential impacts to egretry flight lines in that it will place the development away from the main flightlines" (Section 1.1 of Annex D7). However, the application site is so close to the Wetland Conservation Area (WCA). CA doubts whether the LA of 0.25 ha could be an effective buffer between application site with large-scale residential development and the adjacent habitats, especially WCA.

The project proponent claimed that the design of LA was similar to those commercial fishponds found in Deep Bay area (Section 2.1 of Annex D7). Nevertheless, the project

proponent has not provided any scientific evidence and detailed explanation to show the proposed design and operation of the LA could mitigate any adverse impact, especially on egretry flight lines, and make the public question the sustainability of the LA.

2. Impacts on the egretry

Although Block T7 was substituted with a communal garden, CA is of grave concern that human disturbance and light pollution from the application site will still cause significant impact to the Tung Shing Lei egretry flight lines, as Flight Line 1 is very close to Block T6 and over the communal garden (Figure 1).

3. Insufficient information of flight lines

The flight lines surveys submitted by applicants have not included spring migratory period (Figure 2). Neglecting flight line survey during spring migratory months will lead to inaccurate result of EcoIA.

4. Potential cumulative impacts

The impacts from the proposed development, with planning application No. A/YLNSW/1 which is adjacent to the captioned planning application had not been comprehensively assessed. Since egrets will fly from Tung Shing Lei to northern fishpond for foraging, all the planning applications will narrow the flight lines of egretry from Tung Shing Lei and eventually affect the egretry or even lead to abandonment of it.

Yours faithfully,

梁德叫

Leung Tak Ming Campaign officer

Figure 1 Flight lines of egretry during wet season and the new master layout plan of proposed development

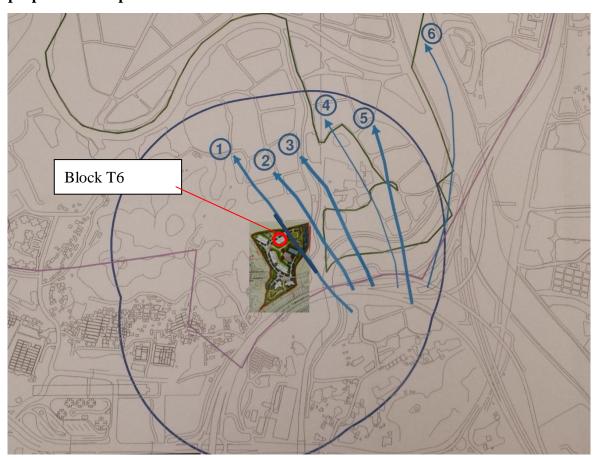


Figure 2 Schedule of field survey activities conducted under current application

Table D1 Sci	hedule of field survey activities conducted under the current appli								2014				2015 c Jan
Month	2013								Jan Feb Sept De				
	May	Jun	Jul	Aug	Sep	UCL	IVOV	Dec					
Habitat mapping							×		X	X			
Botanical survey							X		X	X			
Birds: transects					Х	Х	X	X	X	X		X	×
Birds: flight lines					Х	X	Х	X				X	1
Birds: egretry flight lines	x	x											
Dragonflie s & Butterflies					×	X	X	×	X	×	X	×	
Other terrestrial fauna					X	×	X	x	X	×	Х	×	