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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](mailto:tpbpd@pland.gov.hk)

Dear Sir/Madam

Re: Comments on the Section 16 Application No. A/YL- NSW/233

The Conservancy Association (CA) OBJECTS to Section 16 Application No. A/YL-NSW/233. Despite amendment in building height, the plot ratio of this new application is indeed higher than the past applications A/YL-NSW/224 and A/YL-NSW/172.

#### **1. Landscaped Area Plan lacks of scientific support**

According to Landscaped Area Plan in Annex D5, 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 help mitigate for potential impacts to egret flight lines in that it will place the development away from the main flightlines*” (Section 1.1 of Annex D5). However, the application site is so close to the Wetland Conservation Area (WCA). CA doubts whether the LA could be an effective buffer between application site with large-scale residential development and the adjacent habitats, especially WCA.

Secondly, Block T7 would still block the original flight line No. 1 next to the LA, according to the wet season flight line survey (Figure 1) and act as an obstacle between the foraging grounds and the Tung Shing Lei egret. Besides, project proponent claimed that the design of LA was similar to those commercial fishponds found in Deep Bay area

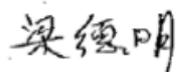
(Section 2.2 of Annex D5). Nevertheless, the project proponent has not provided any scientific evidence and detailed explanation to show the proposed design and operation of the LA could mitigate any adverse impact, and make the public question the sustainability of the LA.

## **2. Inadequate baseline ecological survey**

According to Paragraph 6.8 of the Town Planning Board Planning Guidelines No. 12C, *“For planning applications requiring ecological impact assessment within either the WCA or the WBA, 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”*. Despite the fact that project proponent conducts a supplementary ecological survey on the watercourse on the east of the application site on September 2014, it is still inadequate in providing enough representative data for a comprehensive ecological impact assessment (Figure 2) since ecological survey on migratory birds in Autumn and Spring migratory months, herpetofauna, dragonfly and some butterfly species in habitats such as agricultural land and marsh within 500m from the application site during wet season still have not been carried out.

With reference to the large scale of the residential development, an ecological survey more than 12 months must be provided in order to identify all the potential impacts.

Yours faithfully



Leung Tak Ming  
Campaign officer

**Figure 1** Flight line No.1 would pass through Block T7 (marked in red star)

