



長春社 Since 1968

The Conservancy Association

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7<sup>th</sup> April 2021

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/H14/83

The Conservancy Association (CA) is in GREAT RESERVATION on the captioned application.

**Impact on rare plant species and surrounding vegetation cover**

From our observation, areas close to the proposed site is indeed well-covered by vegetation cover (Figure 1). We can also spot a plant species named *Aristolochia mollis* within and surrounding the proposed (Figure 2 and 3) site. This species is very rare and highly restricted in distribution in Hong Kong. It is the host plant for two butterfly species named *Byasa confusus* and *Pachliopta aristolochiae*. The former is of “Local Concern”<sup>1</sup>, while the latter is “Rare” according to AFCD assessment. We worry that the proposed telecommunications radio base station would lead to direct loss of this rare plant species and pose adverse impacts on these butterfly species.

In specific, we are concerned about the following issues:

1. It is unknown if a detailed ecological impact assessment has been conducted to justify that no adverse ecological impacts would be resulted

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<sup>1</sup> Fellowes, J.R., Lau, M.W.N., Dudgeon, D., Reels, G.T., Ades, G.W.J., Carey, G.J., Chan, B.P.L., Kendrick, R.C., Lee, K.S., Leven, M.R., Wilson, K.D.P. and Yu, Y.T. (2002). Wild animals to watch: Terrestrial and freshwater fauna of conservation concern in Hong Kong. *Memoirs of the Hong Kong Natural History Society*, 25: 123-159.



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2. No detailed vegetation survey and tree survey are provided to identify species within and adjacent to the proposed site
3. As the site is surrounded by Green Belt which is well-vegetated and near to Aberdeen Country Park and Tai Tam Country Park, it is doubtful if any indirect impacts during construction phase, such as vegetation removal, tree pruning, provision of temporary access, and so on, would be anticipated on these areas
4. It is unknown if any mitigation measures would be proposed to mitigate or compensate potential environmental impacts

We opine that clarification on the above concerns is necessary before the planning application is approved by Town Planning Board.

Yours faithfully,

Ng Hei Man

Campaign Manager

The Conservancy Association



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**Figure 1 Condition of the proposed site and its adjacent area which is still well vegetated**





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Figure 2 and 3 *Aristolochia mollis* within and surrounding the proposed site

