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The Conservancy Association

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Town Planning Board

15/F North Point Government Offices

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North Point

Hong Kong

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

Dear Sir/Madam

RE: Comments on the Section 12A Application No. Y/YL-TT/2

The Conservancy Association (CA) OBJECTS to Section 12A Application No. Y/YL-TT/2. The claim to relocate inhabitant of Tai Kiu village, as said in the application, is not justified as the entire plan is indeed a development project in expense of rural setting in Tai Tong. CA is also doubtful of the rationale to rezone Tai Tong due to re-site of Tai Kiu Village, as the government would facilitate village resettlement due to public works rather than private development project.

Ecological concerns within site area

The existing "Agriculture" (AGR) zone would not only serve for the agricultural purpose but also buffer area to prevent undesirable impacts from nearby open storage activities and probably some village development. While CA could still spot some active farming activities in the south-east of the site, we worried that the proposed development, through encroaching the existing agricultural land, would deprive this zone from addressing the above impacts arise from interface issues. It should not be neglected that part of Tai Lam Country Park falls right next to the proposed development site but clearly the current application fails to take this into account. Another concern would be some natural streams flowing along existing agricultural land, as according to the proposal, they would be subjected to become either small houses or paved roads with no details on such work on existing stream habitat.

From the ecological perspective, CA would urge for further ecological assessment, which is now lacking, to fill current information gap. Simply accepting the perception of agricultural land as low ecological value with high human disturbance should not be acceptable.

Tai Tong Egretry

Tai Tong has long been an important site of egretry for Cattle Egret¹. The active egretry is located just about 500m outside the rezoning site. Local studies² have shown that the location of bird nesting habitat and foraging ground is closely related, with the average distance of 2km³. Such loss of ecological linkage would pose the adjacent Tai Tong egretry into vulnerable condition. It requires further understanding if such ecological linkage would be adversely affected by the proposed project. In the meanwhile, the government, particularly Agriculture, Fisheries and Conservation Department, should raise comments from ecological perspective so that any ecological concerns arise from this “AGR” zone would not be left without notice.

Tree Assessment

Despite provision of a tree survey, CA remained doubtful that it did not cover south-east part of the site where considerable amount of trees can be noted. Additional assessment on this part of area is definitely necessary. It should be highlighted again that the hierarchy for tree removal should be strongly adhered to ensure that no trees were unnecessarily felled.

With reference to the scale of the project together with the above ecological concerns, it would also be necessary to consult Environmental Protection Department if the project is identified as designated project under Environmental Impact Assessment Ordinance.

Yours faithfully



Ng Hei Man
Senior Campaign Officer

¹ HKBWS (2010). Mai Po Inner Deep Bay Ramsar Site Waterbird Monitoring Programme 2010 – 11. Egretry Counts in Hong Kong with particular reference to the Mai Po Inner Deep Bay Ramsar Site Summer 2010 Report.

http://www.hkbws.org.hk/web/chi/documents/report/egret_summer_report_2010.pdf

² Wong, L.C., Corlett, R.T., Young, L. and Lee, J.S.Y. (1999). Foraging flights of nestling egrets and herons at a Hong Kong Egretry, South China. *Waterbirds* 22: 424-434. <http://www.hku.hk/ecology/staffhp rtc/corlett-pdf/Captain-foraging-1999.pdf>

³ Wong, L.C., Lam, W.Y. and Ades, W.J. (2009). *Ecology of the birds in Hong Kong*. Hong Kong: Kadoorie Farm & Botanic Garden.