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The Conservancy Association

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22nd June 2010

Town Planning Board
15/F North Point Government Offices
333 Java Road
North Point
Hong Kong

By Fax: 28770245/25228426

Dear Sir/Madam

Re: Comments on the Section 16 Application No. A/YL-NSW/197

The Conservancy Association (CA) OBJECTS to Section 16 Application A/YL-NSW/197.

The supplementary information still did not address direct loss of wetland habitat due to pond filling. The justification that “*Given that Hong Kong has already transformed to service-oriented industries, it is considered not pragmatic to preserve the pond for fish culture purpose*” simply neglects other intrinsic value of fishpond in, for example, local ecosystem and hydrological system. While the application intends to address ecological concerns by claiming that the pond in the northern site (see the Indicative Landscape Master Plan) as a part of ecological mitigation measures, it provides no justifications and tends to be misleading in certain extent, as it appears to be a private landscaped pool rather than a mitigation area with detailed conservation management plan. In proximity to the boundary of Wetland Conservation Area (WCA) according to Town Planning Board Guideline No. 12B, a detailed ecological impact assessment (EcoIA) equipped with ecological baseline is definitely necessary.

It is worried that the proposal adversely affects the adjacent active egretty at Tung Shing

Lei according to AFCD research¹. It should be careful of the applicant's response indicating that the bird flight path does not pass through the southern part of the proposed development. As shown in the supplementary map in Appendix A, the major flight path indeed falls on the northern site consisting 149 low-rise residential blocks. Impact to ardeids population on such high development density should not be under-estimated. Moreover, local studies² have shown that the location of bird nesting habitat and foraging ground, like fishponds, is closely related, with the average distance of 2km³. Simply filling the existing ponds for development without realizing this important ecological linkage would pose the adjacent Tung Shing Lei egretty into vulnerable condition.

Yours faithfully
Ng Hei Man
Campaign Officer

¹ Lee W. H. E., Wong, Y.H., Chow, K.L.G. & Lai, C.C. (2007). Review of egrettries in Hong Kong. *AFCD Hong Kong Biodiversity 13*. http://www.afcd.gov.hk/tc_chi/publications/publications_con/files/IssueNo14.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 Egretty, 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 & Botanix Garden.