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The Conservancy Association

會址：香港九龍吳松街 191-197 號突破中心 9 樓

Add.: 9/F., Breakthrough Centre, Woosung Street, Kowloon, Hong Kong

電話 Tel.: (852)2728 6781 傳真 Fax.: (852) 2728 5538

1st April 2011

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/205

The Conservancy Association (CA) OBJECTS to Section 16 Application A/YL-NSW/205.

The supplementary ecological information still cannot address ecological concerns arisen from the small house proposal. It should be noticed that the survey was conducted in 2 days only (15th and 17th February 2011), while butterfly and dragonfly survey was conducted in wrong season. The poor presentation, including non-italics on scientific names, no legends on symbols and abbreviation, should be challenged. Even the pond habitat loss is small in area as a result of pond filling, the associated noise and light pollution during and after small house construction would threaten foraging habitat of ardeids.

The ecological linkage between the site and the adjacent active egretty at Tung Shing Lei according to AFCD research¹ had not been taken into consideration. Local studies² have

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>

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 egret into vulnerable condition.

CA again demands a more stringent planning control be enforced on this site to reflect the planning intention of conservation purpose. According to Town Planning Board Guideline No. 12B, the application site falls within Wetland Buffer Area (WBA). The current application to zone the site as “Village Type Development” would in some extent supersede the intention of WBA to “*protect the ecological integrity of the fish ponds and wetland within the Wetland Conservation Area and prevent development that would have a negative off-site disturbance impact on the ecological impact on the ecological value of fish ponds*”. Protection through planning perspective would prevent the area from adverse impacts of development.

It should be noticed that there were another planning application in adjacent, such as A/YL-NSW/172 (approved with conditions in 2007) and A/YL-NSW/207. No attempts in assessing potential cumulative impacts by various development projects in WBA would threaten the integrity of wetland ecosystem in this region.

Yours faithfully
Ng Hei Man
Senior Campaign Officer

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.