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The Conservancy Association

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8<sup>th</sup> 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/207

The Conservancy Association (CA) OBJECTS to Section 16 Application A/YL-NSW/207.

According to Town Planning Board Guideline No. 12B, the application site falls within Wetland Buffer Area (WBA), but currently zoning 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*”. More stringent planning control should be enforced by rezoning the site to stress on planning intention on conservation purpose, thus protecting the area from adverse impacts of development.

CA worries that the proposal would result in direct loss of wetland habitat and particularly affect the ecological linkage between the site and the adjacent active egretty at Tung Shing Lei. Local studies<sup>1</sup> have shown that the location of bird nesting habitat and foraging ground,

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<sup>1</sup> 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>

like fishponds, is closely related, with the average distance of 2km<sup>2</sup>. Simply filling the existing ponds for development without realizing this important ecological linkage would pose the adjacent Tung Shing Lei egret into vulnerable condition. Although small house application would be exempted for preparing an ecological impact assessment as mentioned in Town Planning Board Guideline No. 12B, CA still urges for a comprehensive ecological survey to address potential ecological concerns.

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/205. 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

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<sup>2</sup> Wong, L.C., Lam, W.Y. and Ades, W.J. (2009). *Ecology of the birds in Hong Kong*. Hong Kong: Kadoorie Farm & Botanic Garden.