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The Conservancy Association

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2nd July 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/196

The Conservancy Association (CA) OBJECTS to Section 16 Application A/YL-NSW/196. The supplementary information still did not actively respond to ecological concerns with clear and concrete details.

The supplementary information keeps on stating that ecological mitigation measures in terms of landscape area would be provided and would cover more than half of the site area. It however 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. The statement also gives no strong proof on fulfilling the “no-net-loss in wetland” principle according to Town Planning Board Guideline No. 12B, as the principle refers to not only “area” but also “function” which still has not been fully demonstrated in the planning statement.

The applicant’s conclusion that the provision of the water body with size larger than the one currently existing on the site would improve the overall ecological value is too vague in identifying any ecological impacts arise from the project. It should again highlight that the site lies within the boundary of Wetland Conservation Area (WCA) according to Town Planning Board Guideline No. 12B, so that the applicant should not evade the responsibility to conduct detailed ecological impact assessment (EcoIA) together with a

12-month field investigation and ecological baseline. Such application within the WCA without a proper ecological assessment should not be approved by the Board.

It should be noticed that there is another planning application A/YL-NSW/195 in adjacent. Citing that “*two planning applications are both low-rise domestic houses and they are therefore considered compatible with the surrounding rural environment*” only would not give strong justification on no cumulative impacts caused by the development. Especially, the site is in adjacent to some ecological sensitive areas, including Yuen Long Flooding bypass and the active egret¹ at Tung Shing Lei. The applicant should ensure that the integrity of wetland ecosystem is maintained at all times.

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