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The Conservancy Association

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22nd February 2011

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

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

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.

CA's previous concern on ecological impact brought by the proposed plan is still valid because it fails to address ecological concerns raised by AFCD. It should be reiterated that the water feature suggested by the applicant could not be considered as ecological mitigation measures because it appears to be a private landscaped pool rather than a mitigation area with detailed conservation management plan. It deviates the planning intention of Nam Sang Wai Outline Zoning Plan (OZP) which states that "*the planning intention of the area further away from the fish ponds is to protect the ecological integrity of the wetland ecosystem, and prevent development that would have a negative off-site disturbance impact on the ecological value of fish ponds*". CA still sticks to our previous suggestion that a detailed ecological impact assessment (EcoIA) equipped with ecological baseline is definitely necessary.

CA should reiterate that the proposal would continue to pose threat to the adjacent active egretty at Tung Shing Lei according to AFCD research¹. Local studies² have shown that

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*

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

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 & Botanic Garden.