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The Conservancy Association

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10th December 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/195

The Conservancy Association (CA) OBJECTS to Section 16 Application A/YL-NSW/195. The supplementary information still did not actively respond to ecological concerns with clear and concrete details.

It should be noticed that the supplementary ecological survey was conducted in 2 days (31st July and 13th August 2010) only. Seasonal variation would definitely affect species diversity and abundance, but this factor has not been taken into account. Since the site lies within the boundary of Wetland Conservation Area (WCA) according to Town Planning Board Guideline No. 12B, 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.

The supplementary information still cannot give strong proof to fulfill the “no-net-loss in wetland” principle according to Town Planning Board Guideline No. 12B. It should be again highlighted that the principle refers to not only “area” but also “function” which still has not been fully demonstrated in the planning statement.

It should be noticed that there are another planning application A/YL-NSW/196 and

A/YL-NSW/197 in adjacent. However, the application still gives no attempts to assess potential cumulative impacts caused by various development projects. 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. The applicant should ensure that the integrity of wetland ecosystem is maintained at all times.

Yours faithfully
Ng Hei Man
Campaign Officer