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People and birds living in harmony as nature continues to thrive

Secretary, Town Planning Board
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By email only

8 May 2024

Dear Sir/Madam,

Comments on the Draft San Tin Technopole Outline Zoning Plan No. S/STT/1

The Deep Bay (also known as Shenzhen Bay) wetland system, including San Tin fishpond wetlands which is situated in the core of the whole system, is a valuable and unique coastal wetland resource in the Guangdong-Hong Kong-Macao Greater Bay Area. Hong Kong has the responsibility to protect the integrity and biodiversity of the wetland, safeguarding the important ecological corridor for migratory birds, so as to align with the objectives of the 'Outline of the 14th Five Year Plan for National Economic and Social Development of the People's Republic of China and the Long-Range Objectives Through the Year 2035' (the National 14th Five-Year Plan) and the planning principles of the Greater Bay Area, as well as to assist China in fulfilling the obligations under the Convention on Biological Diversity and the Ramsar Convention.

The Hong Kong Bird Watching Society (HKBWS) would like to express the following planning and ecological concerns in relation to the Draft San Tin Technopole Outline Zoning Plan (OZP) No. S/STT/1 (the Draft STT OZP).

1 Scarification of internationally important wetlands for I&T development does not align with the national and Greater Bay policy

1.1 From the Notes and Explanatory Statement of the Draft STT OZP, it quoted part of the National 14th Five-Year Plan which is to support Hong Kong "*to enhance, establish and develop into, amongst others, an international innovation and technology (I&T) centre*". It is also stated that the San Tin

Technopole (STT) will be "*actively responding to and capitalising on the national development strategy of supporting Hong Kong to develop into an international I&T centre as outlined in the National 14th Five-Year Plan, and implementing the concept of 'one river, two banks' and 'one district, two parks' under the auspices of 'One Country, Two Systems'*".

1.2 We appreciate the willingness of the government to align with the national policy, but we are disappointed that the government did not put equal level of attention to the ecological civilization, which make the STT fail to align with the national policy. According to the Chapter 11 of the National 14th Five-Year Plan titled "*Promoting Green Development and Facilitating Harmonious Coexistence between Humans and Nature,*" it highlighted "*Green waters and the green mountains are gold mountains and silver mountains*". To construct a beautiful China, we need to respect, adapt to, and protect nature, prioritize conservation and efficiency, give priority to natural restoration, implement sustainable development strategy, improve the coordination mechanism for ecological civilization, establish an ecological civilization system, and promote comprehensive green transformation of economic and social development.

1.3 In the Outline Development Plan for the Guangdong-Hong Kong-Macao Greater Bay Area also mentioned about provision of ecological protection and explicitly stated the need to "*strengthen wetland protection and restoration, comprehensively protect internationally and nationally important wetlands within the region and carry out cross-border collaborative protection of coastal wetlands.*"[1] In the Territorial Spatial Planning of Guangdong Province 2020-2035, it proposed to enhance the ecological spatial planning, such as "*strengthening the protection of globally important biodiversity*" and "*constructing global migratory bird stop-over site, with a focus on promoting the construction of ecological corridors for water birds in the Pearl River Delta region, and to create a bay area for migratory bird*"[2]. Moreover, in the Pearl River Delta Waterbird Ecological

[1] http://nr.gd.gov.cn/attachment/0/413/413359/3225138.pdf

[2] http://nr.gd.gov.cn/attachment/0/413/413359/3225138.pdf

Corridor Construction Plan (2020-2025), the Deep Bay wetland system is recognized as an important corridor node for the southern main corridor. In this area, protection and connectivity in and between waterbirds habitats should be strengthened, and strict biodiversity conservation and pollution control strategies should be implemented[3]. We believe that the protection of the precious local coastal wetland ecosystems is of vital importance in maintaining biodiversity and holds national and international significance.

1.4 San Tin is situated in the core of the Deep Bay wetland system. STT development will clearly break the ecological corridor and connectivity for migratory birds, which is not in line with the objectives of the National 14th Five-Year Plan and the planning principles of the Greater Bay Area, as well as assisting China in fulfilling its obligations under the Convention on Biological Diversity and the Ramsar Convention.

2 Absence of scientifically sound ecological study and planning study

2.1 According to the Notes and Explanatory Statement of the Draft STT OZP, it is stated that the impact on ecological and fisheries resources arising from the development at San Tin Lok Ma Chau area of the Technopole could be compensated by the Sam Po Shue Wetland Conservation Park (SPSWCP), in order to achieve no-net-loss in ecological function and capacity of the wetlands concerned. Such statement is largely based on the Environmental Impact Assessment (EIA) Report for "First Phase Development of the New Territories North – San Tin/Lok Ma Chau Development Node" (the Study) commissioned in October 2021. Meanwhile, the area of the SPS WCP, to be approximately 338 ha, is said to be proposed by the "Strategic Feasibility Study on the Development of the Wetland Conservation Parks System under the Northern Metropolis Development Strategy" (WCP Study).

2.2 However, the WCP Study has not yet completed nor published before the gazettal of the Draft STT OZP on 8 March 2024 and the end of this public inspection period on 8 May 2024. Moreover, the EIA Report has not yet been approved under the EIA Ordinance. It is doubted if the Town Planning Board

[3] https://lyj.gd.gov.cn/government/Information/plan/content/post_3045912.html

(TPB) can properly consider all the environmental aspects of the development at this plan-making stage.

2.3 We would also like to highlight that the said EIA Report for the Study was incomplete and not scientifically sound. The San Tin Technopole development would cause the largest-scale wetland loss in the past 30 years, but the EIA Report has been the most careless and hasty among the other designated projects involving wetland loss since the EIA Ordinance was in operation. It was found with 29 numbers of errors, mistakes, or missing assessments (refer to Attachment 1 for our full comments on EIA Report). As mentioned in the recent joint statement released by ten green groups including us, at least 35 instances of non-compliance with statutory requirements of the EIA Ordinance were identified (Attachment 2). We consider the EIA Report is simply invalid and incapable to provide justification and scientific grounds for the Draft STT OZP.

3 Absence of planning study

3.1 148 ha of I&T zone, including Area 19 A to 19C, was proposed within 150 ha of Wetland Conservation Area (WCA) and 97 ha of Wetland Buffer Area (WBA. However, the detailed land uses within this zoning have not yet been studied and are still subject to another consultancy study.

3.2 Ms Bernadette Linn, the Secretary for Development, mentioned that the Innovation, Technology and lndustry Bureau will commence a consultancy study on the development plan for the new land for I&T use in the San Tin area, as reported in a news on 21 June 2023[4]. According to the official website for Northern Metropolis, it is stated that "*the Government has commenced a consultancy study on the development plan for the new land for I&T use in the San Tin area with a view to recommending specific I&T industries/areas and their positioning in the I&T ecological chain (i.e. upstream (research and development), midstream (prototype, application) or downstream (manufacturing processes) for development at different land*

[4] https://news.rthk.hk/rthk/ch/component/k2/1705744-20230621.htm

parcels, the required infrastructure and supporting facilities, etc."[5]

3.3 The study mentioned above was not available yet. Currently, there is no any land use details, such as the types of I&T industries and the associated infrastructures, were provided. It is also unknown about the potential planning constraints and risks regarding different types of I&T industries. Given the absence of complete and quality EIA and also a detailed planning study for I&T land, we consider the gazettal of Draft STT OZP violate procedural justice.

4 Failed to justify a 10% loss in Wetland Conservation Area is not in compliance with "precautionary approach" and the principle of "no-net-loss in wetland"

4.1 The Draft STT OZP proposes to rezone all the wetland-conservation-related land within 150 ha of WCA and 97 ha of WBA to different development zonings.



[5] https://www.nm.gov.hk/en/innovation-and-technology-zone

4.2 We consider that such encroachment to the two areas should be seriously treated. And we would like to remind the Board that the establishment of **"precautionary approach", "no-net-loss in wetland" principle, WCA and WBA was based on comprehensive scientific and ecological studies.** In 1988, the government commissioned a study on the natural resources and potential environmental issues in the Deep Bay area. This study officially recognized the importance of the Deep Bay wetlands. Subsequently, the government formulated the first Planning Guideline (No. 12) in 1992 to regulate development applications in Deep Bay and established Buffer Zone 1 (BZ1) and Buffer Zone 2 (BZ2). In 1995, the Inner Deep Bay area, including Mai Po, was officially designated as a "Ramsar Wetland." In 1997, the government completed the Study on the Ecological Value of Fish Ponds in the Deep Bay Area (Fish Pond Study), which conducted **at least 12-month ecological baseline study for the whole fishpond areas, comprehensive literature review for about 10-year waterbird data, disturbance study and also both seasonal and spatial analysis**. After all detailed assessments, it confirmed the ecological value of both active and abandoned fishponds, and recommended the principle of "precautionary approach" and "no-net-loss in wetland", and also the designation of different areas to protect interconnected fishponds, ensuring the overall integrity of the Deep Bay wetland ecosystem. In 1999, the government updated the planning guidelines and designated the WCA and 500-m wide WBA. With the opening of the Frontier Closed Area, the government completed the "Ho Hok Wai Ecological Field Study" in 2013 and extended the boundaries of the two designated areas to include Ho Hok Wai and Ma Tso Lung in 2014. It would like to remind the Board that the establishment and every single amendment to the wetland planning principle and planning guideline are based on strong scientific ground.

4.3 However, the current proposed STT, which involves nearly 10% loss in WCA and a total ignorance of WBA, is not only violating the TPB Guideline No. 12C, but also contradict with the rationale of wetland planning over the past 30 years. Despite that, the applicant insisted that the STT development will not result in net loss in wetland function, and is in line with "no-net-loss in

wetland" principle. Without a ecological study that is more comprehensive and detailed than the Fish Pond Study in 1997, we consider a 10% reduction in WCA is contradicting to the previous scientific study and is not acceptable.

5 Absence of general planning intention in regard to wetland conservation and planning principles

5.1 According to the Explanatory Statement of the Approved San Tin Outline Zoning Plan No. S/YL-ST/8, the general planning intention of San Tin Area is to conserve the ecological value of the fish ponds which form an integral part of the wetland ecosystem in the Deep Bay Area, to conserve all the existing and contiguous, active or abandoned fish ponds, and to avoid loss of fish ponds and habitat fragmentation. To achieve the conservation objectives, a "precautionary approach" and the principle of "no-net-loss in wetland" were adopted. Moreover, in the section explaining the opportunities and constraints, Fish Pond Study was highlighted to present the opportunities "*to preserve/enhance these natural resources, and to restore some of the degraded areas*."

5.2 In the Explanatory Statement of the Draft STT OZP, the section of general planning intention was replaced by two sections named planning themes and urban design and landscape framework, and building height restrictions in the area. In these two sections, the "precautionary approach" and the principle of "no-net-loss in wetland" were not adopted within the STT area. Meanwhile, when explaining the opportunities and constraints, it only mentioned about the Mai Po Lung Village, Mai Po Village and the SPSWCP which is outside the STT OZP, as the Ecological Resources within the STT area.

5.3 The Draft STT OZP failed to recognize the interlinking relationship between STT area and the surrounding remaining wetlands including Mai Po Inner Deep Bay Ramsar Site. Without adopting the "precautionary approach" and the principle of "no-net-loss in wetland" in this OZP, it failed to guide the plan to avoid potential impacts of the development within STT area on the Deep Bay wetlands, such as future planning applications for different incompatible uses, relaxation on building height, etc.

6 Other Specified Uses (Innovation and Technology) (OU(I&T)) zone

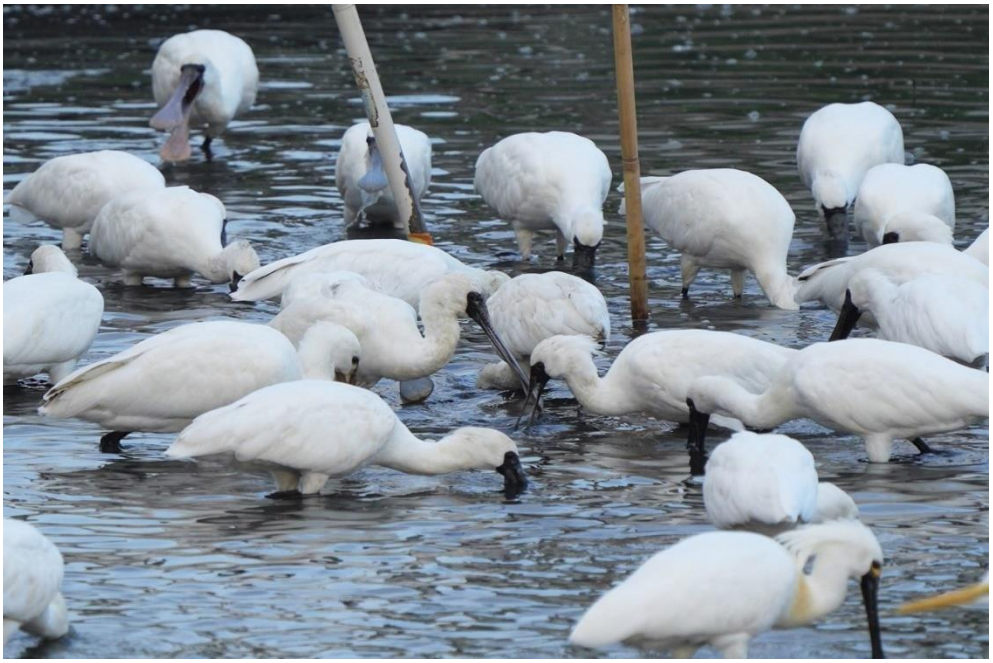
Concerns about the existing wetlands of very high ecological value

6.1 The "Conservation Area", "Other Specified Uses (Comprehensive Development and Wetland Enhancement Area)," and "Other Specified Uses (Comprehensive Development to include Wetland Restoration Area)" within WCA and WBA in the OZP No. S/YL-ST/8, will be rezoned to OU(I&T) or Other Specified Uses (Amenity) (OU(A)) under the Draft STT OZP. Based on the EIA Report, about 114 ha of wetlands, including fishponds, marsh and river, will be lost permanently to I&T development after the rezoning. We are concerned the zoning of OU(I&T) and the associated wetland filling will lead to permanent loss in highly ecologically valuable wetlands and cause irreversible damage to the last remaining contiguous coastal wetland system in the Greater Bay Area.

6.2 According to the bird records of HKBWS, the proposed pond filling area, including active, inactive and abandoned fishpond, has a rich biodiversity, with a total of 205 bird species recorded, accounting for one-third of the total bird species in Hong Kong. Among them 117 bird species are of conservation importance, including 19 globally threatened or near threatened species listed in the International Union for Conservation of Nature (IUCN)'s Red List of Threatened Species, such as critically endangered **Baer's Pochard**, critically endangered **Yellow-breasted Bunting**, endangered **Black-faced Spoonbill**, and vulnerable **Common Pochard**. There are also national-level protected animals, with 33 species listed as Class I or II protected animals of China, such as **Eastern Imperial Eagle**, **Greater Spotted Eagle**, and **Cinereous vulture**; and 25 species listed in the "Red List of China's Vertebrates" such as **Red Knot** and **Manchurian Reed Warbler**. The above records provide sufficient evidence that these fishpond wetlands are of extremely high ecological value and are important habitats for many endangered species that are facing extinction.

6.3 In early 2023, HKBWS recorded up to 78 Black-faced Spoonbills foraging in a drained-down fishpond in San Tin, accounting for nearly 30% of the total population in Hong Kong and over 1% of the global population. This meets the criteria for inclusion in the “Wetlands of International Importance”

under the Ramsar Convention, where the number of a waterbird species accounts for 1% of the global figure. Therefore, the fishponds in San Tin are of very high ecological value.



6.4 A Black-faced Spoonbill with the ring number "E29" has been using the San Tin fishpond wetlands for three consecutive winters, reflecting the strong loyalty of the Black-faced Spoonbill to this wetland and the importance of the San Tin fishpond wetlands to the Black-faced Spoonbills. This individual was born in South Korea in 2011 and has been wintering at Deep Bay Area in Hong Kong every year.



6.5 Besides, breeding birds are vulnerable to threats. Any direct habitat loss in their nesting and breeding grounds could have enormous and irreversible impacts on their breeding success and the entire population. Apart the breeding egrets/herons to be discussed in the below sections, the pond filling area is also the confirmed breeding and nesting grounds for **White-breasted Waterhen** (missing in EIA), **Little Grebe** (missing in EIA), **Little Ringed Plover** and **White-shouldered Starling**, which have not been fully identified and assessed in the EIA Report.

6.6 Regarding the so-called abandoned fishpond as frequently highlighted by the government, HKBWS considers that this statement is misleading and gives the impression that the area is of low ecological value and can be destroyed. Taking the fallow fishpond wetlands in the San Tin and Sam Po Shue area as an example, we have recorded the scarce and globally vulnerable Common Pochard for five consecutive years, as well as the rare and globally near-threatened Ferruginous Duck. San Tin is the most important habitat for these species outside Mai Po, and thus has significant ecological value.

6.7 In short, we consider the impacted wetlands are of high ecological value and should not be covered by OU(I&T) zone with the planning intention to "provide development space for accommodating a variety of innovation and technology uses, including research and development, production activities, data centre, staff accommodation/talent apartment, supporting commercial/retail facilities and other complementary infrastructure". There are up to 44 types of land uses that are always permitted under Column 1 use in this zoning, including talent apartments, commercial, hotel, and industrial uses, which are incompatible with the surrounding wetlands and their potential environmental and ecological impacts have not been assessed in the EIA Report as well. In the remarks for this zoning, any new development will not need to submit an environmental impact study report, landscape proposals, drainage and sewerage impact study report, to assess the variable or additional impacts in regard to different types of development. To secure the wetland integrity,, we consider the existing wetlands within WCA should all be preserved by conservation-

related zonings.

Direct impacts on Mai Po Lung Village (MPLV) egretry and Mai Po Village (MPV) egretry

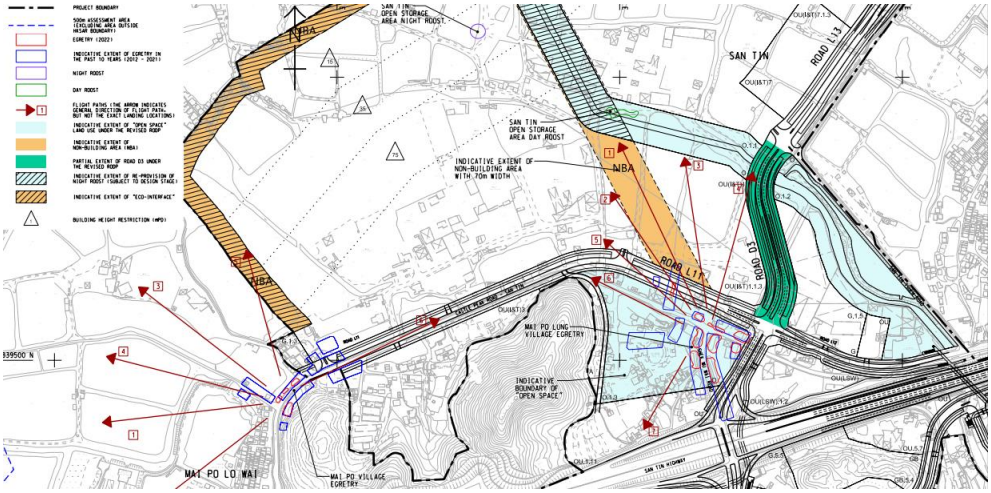
6.8 The EIA Report has seriously underestimated the impacts on egretries. Mai Po Lung Village (MPLV) egretry and Mai Po Village (MPV) egretry, which together support nearly 200 nests of breeding ardeids and is equivalent to almost 46% of the total breeding population of ardeids in Deep Bay, falls within or at the boundary the project area. These two egretries are also the second and third largest egretries in Deep Bay area and both have a history of over 20 years.

6.9 It is noted that a narrow strip of Weeping Fig located at the north of Castle Peak Road (San Tin section) and a small patch of vegetation at the east of Shek Wu Wai Road, which would be removed due to a proposed road upgrading works, without any mitigation measures for the direct loss in nesting trees.

6.10 The **direct loss in feeding and foraging ground** for the breeding egrets and herons has not been properly assessed and mitigated in the EIA Report. The EIA Report only presented the map of the indicative directions of flight paths of the MPLV and MPV Egretry, while the exact locations of landing points were not presented. From the map, **over 95% of the flight paths of the MPLV** were in **north to northwest directions** (e.g. Flight Paths 1 to 5) **to the ponds at San Tin and Sam Po Shue**, and 99% of these flight paths have a flight height of 20m or below. From our observation, **about 50% of Chinese Pond Herons at MPLV would land at the proposed filled fishponds**. As the number of nests of Chinese Pond Heron at MPLV accounts for one-third of the total number in Hong Kong and is the largest breeding population of this species in Hong Kong, it is anticipated that the permanent loss in fishponds will cause **devastating impact** on the breeding ardeids, particularly the Chinese Pond Heron population.

1.1 The **direct disruption of their flight corridor** was not properly assessed and mitigated. Based on the data in EIA Report, approximately **99.4%** of breeding ardeids in MPLV Egretry, and over **26%** of ardeids from MPV Egretry flew

across the development area for feeding and foraging. However, the STT development only leave 70m wide Non-building Area (NBA) for MPLV egretry, which means **nearly 80% of their flight corridor would be disappeared**, and the existing function of low-density landscape as the flight corridor will be totally lost.



1.2 Even worse, we notice that the building height proposed immediately next to the egretries and the proposed NBA within Area 19C is up to 105mPD, which would apparently deter the birds to commute between egretries and wetland area. As breeding ardeids, especially Chinese Pond Heron, would be deterred by the presence of the buildings, including low-density buildings, the dramatic increase in the travelling distance due to the avoidance of high-rises would greatly increase the energy expenditures of the breeding ardeids, which could result in failure in nesting and even abandonment of the egretry.

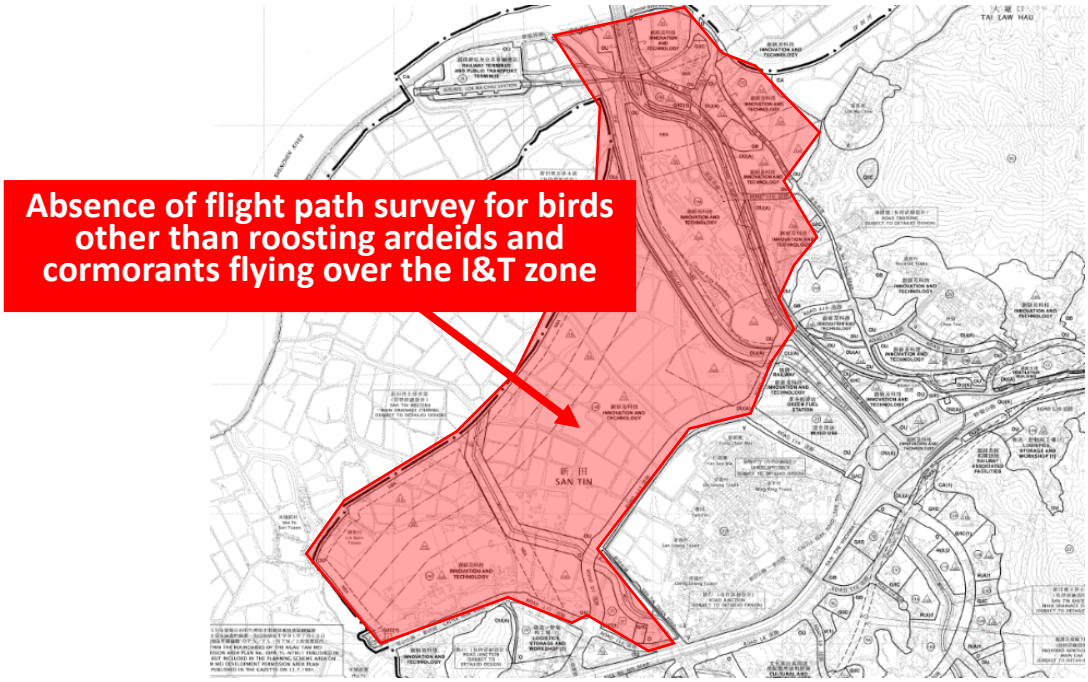


Despite the high possibility of abandonment of the large egretries, there are no follow-up measures to deal with this worst scenario in the EIA Report. This once again reveals the deficiency of the EIA for this Study.

Stepped building height failed to mitigate the impacts on birds flying above the proposed OU(I&T)

1.3 The current proposed building heights within the OU(I&T) are not based on scientific or ecological findings. There is **NO flight path survey** conducted for birds flying above the existing fishponds within proposed OU(I&T). From our observation, the flight height for the birds flying within/across the OU(I&T) are mostly from 0m to 50m. However, the current proposed stepped building heights (i.e. from 105mPD, 75mPD, 35mPD and 15mPD) are much higher than the birds' flight height and the existing surrounding building height of below 15m.

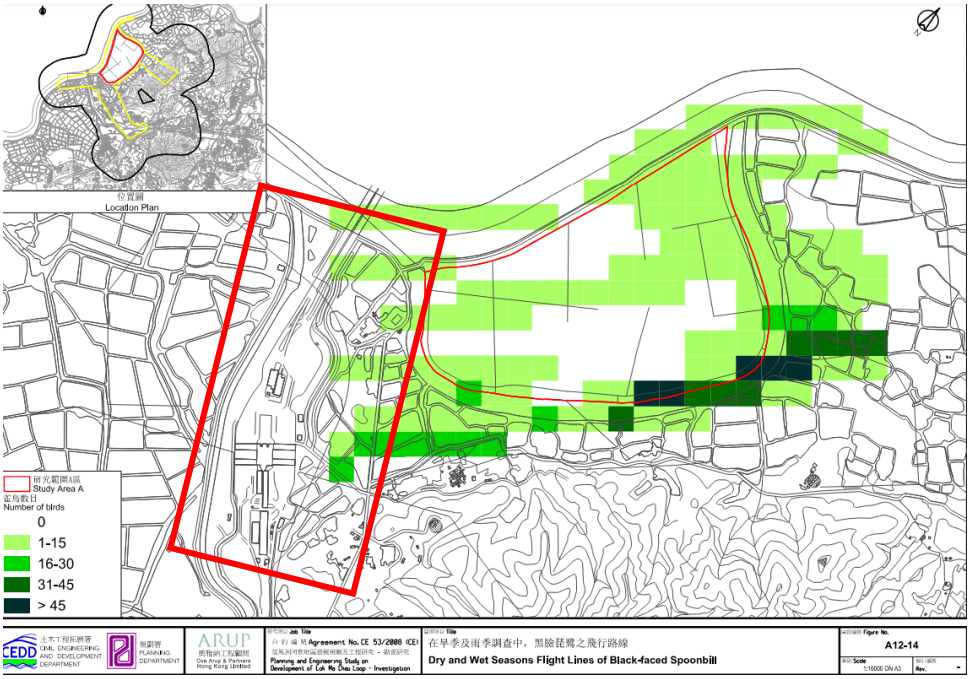
1.4 We consider it is misleading to claim that "*stepped building height (i.e. from 105mPD, 75mPD, 35mPD and 15mPD) gradually decreasing towards the SPS WCP to the north of the Area is recommended to minimise impacts on ecological sensitive area*" in the Explanatory Statement, without having any ecological and scientific grounds.



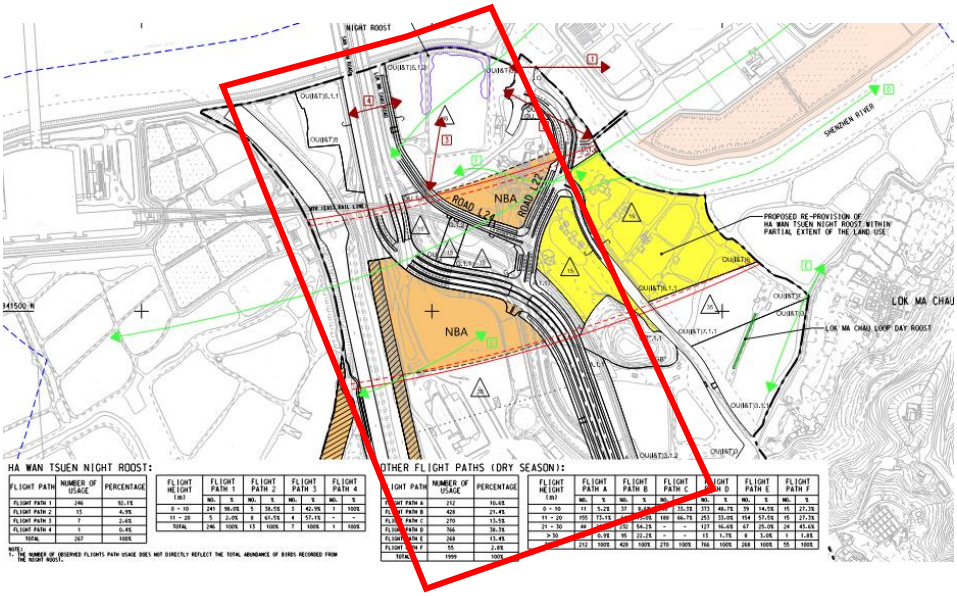
An unfunctional 300m-wide birds' flight corridor

1.5 The area including Ha Wan Tsuen and the LMCBCP, where is around 1200m wide, is indeed the crucial and only movement corridor left to connect Mai Po, Hoo Hok Wai and Ma Tso Lung fishpond wetlands. According to the EIA Report, the applicant only conducted flight path survey for the two night roosts near Ha Wan Tsuen and Lok Ma Chau, but no survey was conducted for other migratory birds flying across this area.

1.6 From the flight lines survey conducted for Lok Ma Chau Loop development as shown in the figure below, the flight lines data for Black-faced Spoonbill clearly demonstrate that this species will fly though this 1200m wide corridor to access Mai Po to the west or Ma Tso Lung to the east.



1.7 According to the flight paths recorded in the poor-quality EIA Report, it can still be revealed that the flight paths were distributed all over the wetland areas. A 300m wide flight corridor is considered to be insufficient to avoid or minimize the fragmentation of movement corridor for avifauna.



1.8 **<u>We consider a 1,200m wide corridor (i.e. the width is measured from the fishponds next to Shenzhen River at Ha Wan Tsuen, to the fishponds near Ha Wan Fisherman San Tsuen and Pun Uk Tsuen) to preserve the remaining and the only movement corridor to access the fishpond wetlands in Hoo Hok Wai/ Ma Tso Lung should be provided</u>**.

1.9 Apart from the width of the corridor, the building heights allowed with this corridor should be restricted to not more than the existing low-density landscape, so as to avoid fragmentation of the avifauna movement and disruption to the only movement corridor for connecting the wetlands between the Ramsar Site, San Tin and Ma Tso Lung. Referring to the flight path survey in the EIA Report, among 2,202 numbers of usage of the flight path corridor around the LMCBCP, over 96% of them were recorded with a flight height within 0-30m.

1.10 However, according to the Draft STT OZP, the eastern half of the corridor is zoned as OU(I&T) which "*comprises a proposed low-rise AFCD Fisheries Research Centre (≤ 15mPD)*", while several new elevated and at-grade roads

will also be constructed across the proposed 300m flight corridor. That means the corridor is not designed as an NBA and will even potentially deter birds from flying through, undermining the function as a flight corridor. Moreover, the recommended building height within 100m from the proposed flight corridor can be up to 35mPD high, while the buildings within 100-200m from the corridor can be up to 130mPD high. The birds that attempt to avoid high-rises will not be able to fly through, resulting in fragmentation of the avifauna movement.

1.11 A 1,200m wide movement corridor composes of Non-building Area or open-country environment should be provided by proper zonings and restrictions. Any development with building height over the existing elevation should be required for a submission of ecological impact assessment and followed "no-net-loss in wetland" and "precautionary approach". Buildings within 500m outside the corridor should also be zoned as zonings with stringent height/density control (i.e. 3-storey or low-density).

7 Concerns about "Open Space" (O) zone.

7.1 An Open Space is proposed to "*preserve birds' flight paths and the Mai Po Lung Village Egretry*". This zoning is intended primarily "*for the provision of outdoor open-air public space for active and/or passive recreational uses serving the needs of local residents as well as the general public*". Moreover, there are 14 land uses under column 1, which are always permitted. However, some of them could result in intensive human disturbance, such as Playground, Barbecue Spot, Visitor Centre.

7.2 Given that no ecological consideration is reflected in the statutory planning intention and Column 1 Uses, and there are no remarks under this zoning to restrict the development in Areas 19C and 20 in regard to the potential impacts on breeding ardeids, we consider it is inappropriate to zone the breeding colony of high ecological importance as Open Space. Instead, a more **stringent conservation-related zoning should be provided to effectively protect the egretry**.

8 Preservation of rural culture and Agricultural land

8.1 Traditional pond fish culture contributes to the sustainability of the economy, society, and environment. Aquaculture of Fresh-water Fish Technique is included in the list of Hong Kong Intangible Cultural Heritage.

8.2 According to the data from the voluntary registration program for local pond fish farms by the Agriculture, Fisheries and Conservation Department, the OU(I&T) will directly impact over 30 formally registered fish farmers. Fish farmers in the San Tin area have been engaged in pond fish farming for the past half-century. In the last decade, they have actively participated in habitat management and conservation scheme subsidized by the government. While preserving the traditional operation of pond fish farming, they have also provided feeding opportunities for waterbirds, maintaining the ecological value of the Deep Bay Wetland.

8.3 Besides, there are several active villages being directly affected by the OU(I&T). Ha Wan Tsuen, Mai Po San Tsuen, Lin Barn Tsuen, etc, are the villages that have close linkage to the pond fish culture and should be preserved.

8.4 There is permanent loss of 10.36 ha of agricultural land affected by the Draft STT OZP. We urge the Board to re-consider zoning the agricultural cluster in Shek Wu Wai as Agriculture to achieve urban-rural integration.

We respectfully request for a review of the following amendments and zonings:

- Including the important wetland conservation principles of "protecting the integrity of wetland ecosystems", "precautionary approach" and "no-net-loss in wetland" as general planning intention and objective.
- Rezoning the "Other Specified Uses (Innovation and Technology)" zones within the "Wetland Conservation Area" ("WCA") and "Wetland Buffer Area" ("WBA") back to their original zonings, which are "Conservation Area", "Other Specified Uses (Comprehensive Development and Wetland Enhancement Area)," "Other Specified Uses (Comprehensive Development to include Wetland Restoration Area)" or other zonings effective for wetland conservation. This is to ensure that any development does not contravene the wetland conservation principles of "Precautionary

Approach" and "No-net-loss in wetland". It should also explicitly state that "No-net-loss in wetland" refers to both area and function.

■ Rezoning the Open Space in Area 19C and 20 to conservation-related zonings to truly preserve the MPLV egretry which is the top three largest egretry in Deep Bay, as well as their foraging grounds.

■ Stringent land uses and low-rise building height restriction should be provided in the corresponding zonings within Area 19B and 19C, where is the flight corridor for breeding egrets and herons flying back and forth between their nests and foraging grounds. This is to ensure that any development does not exceed the current low-density development height and does not cause adverse disturbances to the adjacent sensitive ecosystem.

■ Rezoning the area from the Lok Ma Chau MTR Station, Ha Wan Tsuen and Lok Ma Chau Boundary Control Point to wetland-conservation-related zonings to promote restoration of wetland and open-country environment with limited low-density development. This is to ensure that any development does not exceed the current low-density development height and does not cause adverse disturbances to the adjacent sensitive ecosystem, thus safeguarding the ecological connectivity between Mai Po, Ma Tso Lung and Long Valley.

■ Ensure all the new development within WCA should conduct comprehensive ecological impact assessment.

Thank you for your kind attention and we hope that the TPB will take our comments into consideration.

Yours faithfully,
The Hong Kong Bird Watching Society

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