



長春社 Since 1968

The Conservancy Association

會址: 香港新界葵涌貨櫃碼頭路 77-81 號 Magnet Place 一期十三樓 1305-6 室
Add.: Units 1305-6, 13/F, Tower 1, Magnet Place, 77-81 Container Port
Road, Kwai Chung, New Territories, H.K.
網址 Website: www.cahk.org.hk

電話 Tel.: (852) 2728 6781 傳真 Fax.: (852) 2728 5538
電子郵件 E-mail: cahk@cahk.org.hk

19th April 2022

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,

Comments on the Section 12A Application No. Y/YL-NSW/7

The Conservancy Association (CA) OBJECTS to the captioned application.

1. Not in line with the planning intention

According to the Town Planning Board Guidelines for Application for Developments within Deep Bay Area (No. 12C), the application site is located within Wetland Buffer Area (WBA). The planning intention of WBA is “*to protect the ecological integrity of the fish ponds and wetland within the WCA and prevent development that would have a negative off-site disturbance impact on the ecological value of fish ponds*”.

By introducing a population of 5,592 and 1,997 flats, such large development scale would potentially induce adverse off-site disturbance impacts on adjacent wetland in Wetland Conservation Area (WCA), affect ecological function and integrity of Deep Bay wetland ecosystems. We opine that this is definitely not in line with the TPB Guideline No. 12C and the planning intention of WBA.

2. Incompatible with the surrounding environment

Regarding Other Specified Uses (Comprehensive Development to include Wetland Restoration Area) (OU(CDWRA)), Section 9.7.12 of the Explanatory Statement of Approved Nam Sang Wai Outline Zoning Plan (S/YL-NSW/8) mentions that “*To be in line with the rural setting which is mainly low-rise residential developments and village houses, to minimize visual impact and to take into account the capacities of*



local road network and infrastructure in this area, development or redevelopment shall not result in a total development or redevelopment in excess of a maximum plot ratio of 0.4 and a maximum building height of 6 storeys including car park". The proposed application, comprising 7 residential blocks with 15 storeys, would be a large amendment to the original planning requirement. It is highly incompatible with the surrounding rural setting with low development density which is usually no more than 3 storeys high.

3. Adverse ecological impact

With reference to Ecological Survey Programme (Table 3.1) of Ecological Impact Assessment (EcoIA), some surveys are still incomplete. It would be surprising for the applicant to come up with conclusion that all potential adverse ecological impacts are fully assessed and mitigated. We are highly doubtful that such rezoning application ensures ecological integrity of WBA, WCA, and the entire Deep Bay. We have to reiterate some of our major concerns in ecological aspects:

- Indirect disturbance on ponds/wetland within WCA during both construction and operation phases
- Ecological disturbance on the roosting site in Nam Sang Wai
- Ecological disturbance on adjacent egrettries
- Disruption on flight path of birds, particularly breeding egrets and herons from adjacent egrettries; Great Cormorant from Nam Sang Wai
- Potential ecological impact of the proposed Wetland Restoration Area (WRA) during construction and operation phases
- No habitat creation and management plan for the proposed WRA, such as financial arrangement, target species, maintenance, monitoring, etc.

4. Cumulative impacts

Over the past decade, there were already cumulative loss of wetlands in the Deep Bay wetland ecosystem. For instance, the majority of Tin Shui Wai, Yuen Long Industrial Estate, Fairview Park and Palm Spring as well as Futian District of Shenzhen were all built on wetland. Many large-scale development applications within WBA, particularly those in the south of the proposed applications, have been approved or submitted for approval. In future, the adjacent San Tin/Lok Ma Chau Development Node, Northern Link, San Tin Technopole under Northern Metropolis Development Strategy would further increase development pressure within the region. In such case,



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電子郵件 E-mail: cahk@cahk.org.hk

the proposed development would merely constitute greater pressure in the already rather fragile Deep Bay ecosystem.

Yours faithfully,

Ng Hei Man

Campaign Manager

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