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The Conservancy Association

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

By e-mail: [tpbpd@pland.gov.hk](mailto:tpbpd@pland.gov.hk)

Dear Sir/Madam

RE: Comments on the Section 16 Application No. A/YL-NSW-218

The Conservancy Association (CA) OBJECTS to Section 16 Application No. A/YL-NSW-218. CA cannot see the development would support conservation of the ecological value of Nam Sang Wai, currently situated at Wetland Conservation Area (WCA).

**1. Not in line with “no-net-loss in wetland” principle**

According to the Town Planning Board (TPB) Guidelines for Application for Developments within Deep Bay Area (TPB PG-No.12B), “no-net-loss in wetland” principle should be adopted when considering development proposals in the Deep Bay Area. Since the no-net-loss can refer to both loss in “area” and “function”, the wetland loss of 3 hectares in the project would definitely violate the principle. Whether the proposed water element within the residential development can be counted as wetland area (Section 9.3 of Planning Statement) should be carefully considered by the concerned authorities as the nature of the resultant habitat and feature is different.

Although the project proponent states that the conservation management plan would overall increase wetland capacity and function, CA remains doubtful, especially on

re-planting reedbed in north of Nam Sang Wai and Lut Chau, and provision of 17.9-hectare open water body in the east of the proposed residential area. Regarding the former suggestion, the outcome is that ponds which also play important wetland function would be replaced in the north of Nam Sang Wai. In Lut Chau, planting reedbed is mostly on pond bunds only so that its ecological function, compared with that of a large, non-fragmented reedbed, would not be easily replaceable.

For the latter suggestion, it happens as if a landscaped lake rather than wetland with provision of suitable ecological environment for target species. Worse still, the landscape design might undermine ecological functionality of the existing wetland. This is also left without discussion in the Conservation Management Plan. TPB should therefore be highly cautious of the feasibility of the proposal to enhance wetland function in Nam Sang Wai and Lut Chau.

## **2. Reedbed**

It is found by the project proponent that reedbed in south of Nam Sang Wai, with a total area of 48.5ha, is slightly larger than the one in Mai Po and hence is the largest area in Hong Kong now. According to the previous environmental study in 2010 when Henderson intended to extend the commencement of the development, “Yellow Bittern *Ixobrychus sinensis* was recorded regularly during summer 2009, and it was considered likely that the species bred in reedbeds on site”<sup>1</sup>. It was also used as a roost site by large numbers of some common bird species such as Crested Myna, starlings, Yellow Wagtail, Barn Swallow. The reedbed considered to be of high ecological value<sup>2</sup> is therefore fully supported by facts. The existing assessment indeed made similar conclusion that wet reedbed is considered to be of high ecological value, dry reedbed in Nam Sang Wai is of moderate ecological value due to invasion by terrestrial vegetation (Table 20 of EcoIA).

Insisting on residential development in this reedbed is therefore not justified in ecological sense. CA strongly objects to this development proposal causing significant loss of the reedbed.

## **3. Roosting Site of Great Cormorant**

Nam Sang Wai is regional important roosting site for Great Cormorant. The peak count in

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<sup>1</sup> Asia Ecological Consultants Ltd. (2010). Nam Sang Wai Ecological Impact Assessment Section 3.6.14. Application No. DPA YL-NSW/12 Environmental Assessment Study – Volume 2.

<sup>2</sup> Asia Ecological Consultants Ltd. (2010). Nam Sang Wai Ecological Impact Assessment Table 3.15. Application No. DPA YL-NSW/12 Environmental Assessment Study – Volume 2.

February 2012 was 5,841, representing 5.8% of the regional population<sup>3</sup>. Great Cormorant has long been recorded roosting in large trees within both north and south of Nam Sang Wai.

From the fluctuating numbers of Great Cormorants between Mai Po and Nam Sang Wai but stable total count of Great Cormorants in Deep Bay, ecological linkage of roosting site of Great Cormorant between Mai Po and Nam Sang Wai is actually quite well-established. The previous ecological assessment of the development plan in 2010 has already mentioned that roosting cormorants are sensitive to human disturbance and any development would lead to the loss of the roost sites<sup>4</sup>. As a result, CA would strongly object to any form of development or activities that will affect the roosting cormorants in Nam Sang Wai.

CA notes that the project proponent fails to protect part of the southern roost site which would be completely encroached by the proposed residential development. This is contradictory to the result of EcoIA which mentions that “loss of plantation would be of **Very Significant Ecological Significance**” and “Plantation at the southern of the site will be preserved”.

CA would also hope to clarify the justification of the proposed 150m buffer zone for Great Cormorant. Additional study should be conducted by the project proponent to designate a proper buffer zone for the Great Cormorant. Moreover, despite provision of buffer zone, the part of southern roost site lies close to the proposed development site, while the buffer zone also covers low-residential development. Since the distance between part of the southern roost site and the proposed development site would be less than 150m, the resultant impacts such as glare impact and bird collision seem inevitable. It is highly suspected that the buffer zone would serve any real ecological purposes.

CA notices that supplemental planting of eucalyptus trees would be proposed to increase the area suitable for roosting Great Cormorants. More justifications on ecological grounds are necessary, followed by evaluation on site suitability for planting large trees in NSW.

#### **4. Potential Impact Brought by Proposed Connecting Road Bridge**

CA expresses our grave concern on the proposed connecting road bridge linking Nam

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<sup>3</sup> According to Wetland International, the criterion that the 1% regional population at 1,000 individuals was applied.

<sup>4</sup> Asia Ecological Consultants Ltd. (2010). Nam Sang Wai Ecological Impact Assessment Section 3.8.51. Application No. DPA YL-NSW/12 Environmental Assessment Study – Volume 2.

Sang Wai to Wan Lok Road in Yuen Long as we currently sees no justifications for this bridge crossing. According to our site visit, hundreds of Common Black-headed Gull, together with Great Cormorant and Black-winged Stilt, could be spotted at Shan Pui River near the location of the proposed bridge. CA worried of potential ecological impacts on birds arising from associated dredging work and increasing human activities during operational phase. We would definitely not accept any direct loss on habitat and feeding grounds of species mentioned above and other wetland-dependent species.

The proposal also fails to consider potential cumulative impact brought by the proposed cycle track in Nam Sang Wai, including the section connecting Nam Sang Wai and Yuen Long Industrial Estate. waterbirds are sensitive to human disturbance such as increase in vehicular and cycling activities. We especially worry if the construction works start in the dry season which is the peak count of birds in NSW.

## **5. Flight Path**

The EcoIA identifies some significant ecological constraints in and around the Nam Sang Wai site, including main and secondary area of egret flight-lines which indeed covered the entire area of Nam Sang Wai and Lut Chau. It comes to the fact that any development in south of Nam Sang Wai would inevitably overlap current flight path (Figure 1). While construction activities in Nam Sang Wai would increase energy of ardeids flight and scare birds away, it would finally reduce breeding success of egret, thus posing threat on the ecological link between the egret and Nam Sang Wai, and even Deep Bay area. The precautionary principle and avoidance approach should be adopted in handling this application.

## **6. Proposed Nam Sang Wai Wetland Enhancement Area (NSW WEA) and Lut Chau Nature Reserve (LCNR)**

For NSW WEA, CA would reiterate that if it would truly demonstrate compensation of ecological function of the existing large reedbed in southern Nam Sang Wai, in expense of fish ponds either in operation or abandonment. Moreover, the proposed visitors centre, with various components apart from educational activities such as “hostel of about 40 beds, small convenience shop and café, is located close to NSW WEA. How the resultant human disturbance can be avoided has not been mentioned.

Lut Chau is rather well protected from development threat because of its geographical isolation. The traditional fish farming activities there are not considered causing significant threats to the ecosystem there. The proposed LCNR is wholly unnecessary and

its primary function is to justify the proposed development at Nam Sang Wai, which is what we strongly object to.

CA again would like to express grave concern on the cumulative loss of wetlands in the Deep Bay wetland ecosystem over the last 3 decades. 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. The proposed development will constitute a rather substantial loss of wetland in the already rather fragile Deep Bay ecosystem.

Yours faithfully

A handwritten signature in black ink, consisting of a series of fluid, connected strokes that form the name 'Ng Hei Man'.

Ng Hei Man  
Senior Campaign Officer

**Figure 1: Ecological constraints in and around the Nam Sang Wai site, including the main and secondary area of egretty flight-lines**

