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The Conservancy Association

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13th September 2013

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/224

The Conservancy Association (CA) OBJECTS to Section 16 Application No. A/YL-NSW/224.

1. Not complying with Town Planning Board Guideline No. 12B

It should be highlighted that the site lies and Wetland Buffer Area (WBA) according to Town Planning Board Guideline No. 12B. Any development within WBA would require an ecological impact assessment and to demonstrate that any adverse ecological impact could be mitigated, but project proponent fails to do so. CA would not regard Section 2.4 of the Environmental Assessment as ecological impact assessment which is too descriptive without sufficient statistic support.

CA would also emphasize that such large scale of development in WBA should also take into consideration on potential off-site impact on fish ponds in Nam Sang Wai area and even Inner Deep Bay wetlands.

2. Cumulative impact

It should be noticed that there is another planning application A/YL-NSW/223 in adjacent

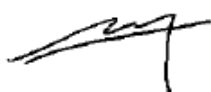
and other planned development according to Nam Sang Wai OZP S/YL-NSW/8, such as V zone at north and the remaining development arise in R(D) zone east of the subject site. CA worries that potential cumulative impact would cause significant disturbance on adjacent ecologically sensitive areas, including Yuen Long Flooding bypass and the active egretty at Tung Shing Lei. The project fails to justify this to ensure that the integrity of wetland ecosystem is maintained at all times.

3. No information on ecological compensation

A natural habitat reserve area in terms of water pond would be created at the northeast corner of the Application Site as an ecological gain (Section 1.3 of Environmental Assessment), according to the project proponent. However, the proposal lacks sufficient details, such as detailed design and conservation management plan, to justify if it can compensate or restore any ecological impacts rather than acting as a landscape feature only.

We also noted that the stream lie proximity to the site, together with mangrove along it, have been seriously trashed due to land formation work within the site. We understand that the comprehensive residential development A/YL-NSW/172-1 has remained valid until December 2015 but any off-site impacts by mal-practice in land formation work should not been tolerated.

Yours faithfully



Ng Hei Man
Assistant Campaign Manager

Vegetation cover including mangrove along the stream, although not included within the development site, has been trashed. (Photos in 2010)

