



長春社 Since 1968

The Conservancy Association

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30th September 2020

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/281

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”. According to the planning intention of “Other Specified Uses” annotated “Comprehensive Development to include Wetland Restoration Area” (OU(CDWRA)), it is “to provide incentive for the restoration of degraded wetlands adjoining existing fish ponds, and to encourage the phasing out of sporadic open storage and port back-up uses on degraded wetland. It is also intended to phase out existing sporadic open storage and port back-up uses on degraded wetlands”.

From the application, introducing a population of 3,840 in the area would increase disturbance to the adjacent area. The application failed to explain how the development, even in temporary in nature, can ensure the ecological integrity of the fish ponds and wetland within the WCA, and restore degraded wetland adjoining



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existing fish ponds. We therefore cannot see how this planning application can achieve the above planning intention.

2. Incompatible development scale

Regarding the explanatory statement of OU(CDWRA), it is stated 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 intensity in excess of a total plot ratio of 0.4 and a maximum building height of 6 storeys including car park*”. However, the proposed plot ratio is not more than 1.7. Such proposal is a substantial increase in development scale in this area and this is not in line with what OU(CDWRA) proposes.

It referring to the Legco paper on transitional housing project (including completed, announced and planned), some large projects would provide 1,600 – 1,988 housing units¹. Therefore, the scale of this proposed transitional housing project is indeed one of the largest one in Hong Kong. Approving this application will set undesirable precedent for similar development in ecologically-sensitive area.

Yours faithfully,

Ng Hei Man

Campaign Manager

The Conservancy Association

¹ Please refer to the paper Legco Panel on Housing – Transitional Housing and Related Matters in May 2020. <https://www.legco.gov.hk/yr19-20/english/panels/hg/papers/hg20200526cb1-652-1-e.pdf>