



長春社 Since 1968

The Conservancy Association

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11<sup>th</sup> October 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 of Wetland Buffer Area (WBA)**

According to the Town Planning Board Guidelines for Application for Developments within Deep Bay Area (TPB PG-No. 12C), the application site is located within 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 PG- 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



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*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 no doubt that this application is highly incompatible with the surrounding rural setting with low development density which is usually no more than 3 storeys high.

### **3. No further information to justify wetland conservation**

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.
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### **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. Meanwhile, according to our research, 8



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planning applications and 1 Land Sharing Pilot Scheme application<sup>1</sup> have been submitted within WBA since the announcement of Northern Metropolis in Policy Address 2021. The plot ratio of those applications, ranging from 1.2 to 4.14, is much higher compared with the previous applications. If all applications are approved, an additional 31,579 units, with a population of 84,422 would be brought into WBA and threatened wetland ecosystem. 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, the proposed development would merely constitute greater pressure in the already rather fragile Deep Bay ecosystem.

Yours faithfully,  
Chow Oi Chuen  
Campaign Officer  
The Conservancy Association

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<sup>1</sup> Another 9 planning applications: Y/YL-NSW/6; Y/YL-NSW/8; Y/YL-NSW/9; Y/YL-MP/6; Y/YL-MP/7; Y/YL-MP/8; Y/YL-LFS/13; Y/YL-ST/1; LSPS/2 (Land Sharing Pilot Scheme)