



**Joint statement on the proposed comprehensive development with wetland enhancement in Nam Sang Wai and Lut Chau, Yuen Long (Planning Application No. A/YL-NSW/242)**

In view of the ecological and conservation importance of Nam Sang Wai and the Deep Bay Area, we, the undersigned, object to the development proposal (Planning Application No. A/YL-NSW/242). Our reasons are listed below:

1. The proposed development is not in line with the “no-net-loss in wetland” principle and the “minimum pond filling” requirement as stated in the Town Planning Board Guidelines for “Application for Developments within Deep Bay Area” (TPB-PG No. 12C). The applicants claim that there will be **NO** net loss in water area; however, the development will in fact cause a net loss of 10.4 hectares of wetland habitats (including associated pond bunds).
2. The applicants fail to demonstrate that the loss of the wetland function could be adequately and fully compensated by the proposed mitigation measures. Regarding the compensation for the loss of contiguous reedbeds through recreating new reedbeds inside fish ponds in the northern part of Nam Sang Wai, it is questionable if the original ecological function of the fish ponds would be fully compensated. Besides, the applicants fail to demonstrate that enhancement of the existing fish ponds in Lut Chau can fully compensate the loss of wetlands in Nam Sang Wai. The off-site ecological impacts on the wetlands surrounding the future residential area have also not been adequately addressed.
3. The development scale is still too large, given that the site and its surroundings are a mosaic of natural habitats with high ecological and conservation value. The Gross Floor Area of the present application is the same as that of the rejected application (A/YL-NSW/218), and the planned population would even increase by 45% to 6,500.
4. The adverse landscape and visual impacts brought about by the proposed development is substantial. The 29 residential towers (19-25 storeys) and 140

houses (3 storeys) proposed are clearly incompatible with the surrounding wetland environment, and will completely damage the landscape of the entire Nam Sang Wai area.

5. The proposed bridge across the Shan Pui River is an important component of the development but it was NOT included within the site boundary of the application. Besides, the proposed bridge's ecological impacts during both the construction and operation phases have not been adequately assessed.
6. The future traffic flows assumed in the Traffic Impact Assessment (TIA) did not consider future developments in the New Territories such as the plans for Yuen Long South, Hung Shui Kiu, Kam Tin South, and other new development areas. The demand for public transport, other than shuttle bus services, has also not been identified in the TIA. For the road network including the proposed road bridge, there is no comprehensive plan for cycle track and pedestrian networks which ensure the safety of cyclists and pedestrians.

Based on the reasons above, we urge the members of the Town Planning Board to reject this planning application. Thank you for your kind consideration.

Co-signatories:

Designing Hong Kong

Green Power

Kadoorie Farm and Botanic Garden

The Conservancy Association

The Hong Kong Bird Watching Society

WWF-Hong Kong

23<sup>rd</sup> July 2015