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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/223

The Conservancy Association (CA) OBJECTS to Section 16 Application No. A/YL-NSW/223.

It should be highlighted that the site lies at Wetland Conservation Area (WCA)<sup>1</sup> and Wetland Buffer Area (WBA) according to Town Planning Board Guideline No. 12B and possibly linked to fish ponds in Nam Sang Wai area and even Inner Deep Bay wetlands ecologically. CA is concerned about on-site impacts such as habitat loss due to pond filling, interference with bird flight paths, and off-site impacts, as well as cumulative impacts with other planned developments, such as small house development in Shan Pui Village and proposed comprehensive residential development A/YL-NSW/172, and remaining development arise in R(D) zone.

According to Section 6.7.3 of Application for Developments within Deep Bay Area under Section 16 of the Town Planning Ordinance, residential development in WBA could be approved for the purpose of “*replacement of existing storage and port back-up uses and/or proposals of detailed wetland restoration may be given special consideration subject to*

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<sup>1</sup> The access road is located within WCA according to the Master Layout Plan.

*satisfactory ecological and other impact assessments*". However, inadequate information was provided by the applicant to justify the above guideline.

Despite the provision of Ecological Impact Assessment (EcoIA), some points should be further clarified:

- i. It was noted that the ecological surveys were conducted in January 2011, the time when a fire was occurred in Nam Sang Wai. It was skeptic if the fire would cause fluctuation in species diversity and abundance within Nam Sang Wai area and thus ecological linkage between the project site and adjacent Nam Sang Wai area might not be easily assessed through the survey.
- ii. The baseline condition in 2011 does not take into account of the effect of MA projects commenced in fish ponds<sup>2</sup> near the development site since early 2012.
- iii. The proposed water body (Section 3.8.2.5 of EcoIA) for ecological compensation 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.

Yours faithfully



Ng Hei Man  
Assistant Campaign Manager

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<sup>2</sup> Hong Kong Bird Watching Society (2013). Partnership with the locals – A Pilot Scheme on Raising the Conservation Value of Fishpond. [http://roadshow.science.hku.hk/wwf/April20pm/04-Helen\\_FONG.pdf](http://roadshow.science.hku.hk/wwf/April20pm/04-Helen_FONG.pdf)