



長春社 Since1968

The Conservancy Association

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10<sup>th</sup> September 2021

Mr Leung Tung-choi, Thomas  
Head of Land Sharing Office  
Planning and Lands Branch  
Development Bureau

By e-mail: [lso@devb.gov.hk](mailto:lso@devb.gov.hk)

Dear Mr Leung,

RE: Comments on Land Sharing Pilot Scheme in Ho Chau Road, Yuen Long  
(Application No. LSPS/002)

The Conservancy Association (CA) OBJECTS to the captioned application.

**1. Not in line with Town Planning Board (TPB) Guidelines No. 12C**

According to TPB Guidelines No. 12C, the application site lies within Wetland Buffer Area (WBA) and very close to Wetland Conservation Area (WCA). It states that “*In considering development proposals in the Deep Bay Area, the Board adopts the Study’s recommended principle of “no-net-loss in wetland” which provides for the conservation of continuous and adjoining fish ponds*”. 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*”.

From the Master Layout Plan, the proposed development would involve pond filling and lead to direct loss of wetland. Some residential towers are also very close to the boundary of WCA and such arrangement would bring disturbance to wetland within WCA. Therefore, we opine that it is not in line with the principle of “no-net-loss in wetland” in TPB Guidelines No. 12C.

**2. Incompatible with surrounding environment**

Compared with some previous planning applications submitted to Town Planning



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Board (TPB), the development scale has significantly increased. For example, the maximum height of residential blocks is proposed to be 25 storeys. Plot ratio of private and public housing is 2.15 and 4.14 respectively. Total anticipated population of the LSPS application would be over 10,000. Such development scale is no differences or even higher to that in some sub-urban areas and it will greatly alter the tranquil rural character surrounding. Together with additional infrastructure such as bus terminus, car park, road widening work, and so on, more human disturbance would be introduced and then lead to degradation of environmental and landscape quality in the area.

### 3. Cumulative impacts

Various development projects are proposed in adjacent to the application site, including the proposed residential development (A/YL-NSW/274), the comprehensive outlet mall development (A/YL-NSW/241), the proposed shopping mall cum hotel development (Y/YL-NSW/3), and so on. This would cause even more adverse ecological impacts in the area during both construction and operation phase. The effectiveness of WBA as a buffer in Deep Bay Area would be further reduced.

Best regards,

Ng Hei Man

Campaign Manager

The Conservancy Association