



長春社 Since1968

The Conservancy Association

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26th November 2021

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. Y/YL-ST/1

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*”.

By introducing a population of 11,312 and 4,176 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 Guideline 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 9.4.8 of the Explanatory Statement of Approved San Tin Outline Zoning Plan (S/YL-ST/8) mentions that “*To be in line*



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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 29 residential blocks with 7 to 18 storeys, would be a large amendment to the original planning requirement. It is highly incompatible with the rural setting with low development density which is usually no more than 3 storeys high.

3. No further information to justify wetland conservation

Initially no supplementary details, such as ecological impact assessment, wetland restoration proposal, etc., have been open for public. Therefore, it is difficult for us to evaluate how the proposal application ensures ecological integrity of WBA, WCA, and the entire Deep Bay. Here we highlight some major concerns:

- Indirect disturbance on ponds/wetland within WCA during both construction and operation phases
- Ecological disturbance on adjacent egretries, including but not limited to Mai Po Village Egret, Mai Po Lung Village Egret
- Disruption on flight path of birds, particularly breeding egrets and herons from the egretries
- Disturbance on birds and other wildlife during construction of wetland restoration area
- Long term management of wetland restoration area (within the development site) and "Conservation Area" zone (outside the development site), such as setting conservation trust, target species, monitoring, etc.

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. Many large-scale development applications within WBA have been approved or submitted for approval. In future, the adjacent San Tin/Lok Ma Chau Development Node, Northern Link, San Tin Technopole



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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,

Ng Hei Man

Campaign Manager

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