



**長春社** since 1968

The Conservancy Association

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Town Planning Board  
15/F North Point Government Offices  
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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/241**

The Conservancy Association (CA) OBJECTS to Section 16 Application No. A/YL-NSW/241.

**1. Not in line with the planning intention of OU(CDWRA)**

The planning intention of OU(CDWRA) is to “*provide incentive for the restoration of degraded wetlands adjoining existing fish ponds through comprehensive residential and/or recreation development to include wetland restoration area*”. The current proposal, however, is largely commercial in nature. This would set an undesirable precedent for similar case within the zone.

**2. Inadequacy of the Commercial Fish Pond Operation Plan**

For the proposed Fish Pond Operation Plan (The Plan), we have the following concerns:

- Fishponds operation for commercial would usually induce operated in commercial nature would create disturbance to waterbirds, such as pond lining with concrete, setting fishing line, and so on. The Plan failed to evaluate the potential disturbance caused by fishponds operation
- The project proposed to set a water depth of 3m (Section 3.2.2 of The Plan). However,

the project would also make reference to the Good Aquaculture Practices Series 3 – Environmental Management of Pond Fish Culture, which recommends that “*water should be 1.2 to 1.8 metres (4 to 6 feet) deep*”. It happens as if the proposed measures are contradictory with each other

- Regarding the cross-section (Figure 3a and 4 of The Plan), the pond bunds are completely vertical and in concrete. We worry if it is too steep and not suitable for waterbirds
- For the tree planting at the western side of the pond, it might still hinder waterbirds to reach the pond

### **3. Under-estimation of ecological impact**

From Figure E2 of EcoIA, a total of 7 Black-faced Spoonbill, listed as “Endangered” under IUCN Red List, were recorded flying at the western fringe of the subject site parallel to Kam Tin Main Drainage Channel (MDC) in December 2012 and January 2013. It also showed that all flight lines, including major and minor, pass through the development site towards Kam Tin MDC, the mitigation wetland in the southwest of the development site and adjacent fish ponds. The EcoIA of A/YL-NSW/218 dated 2012 also once identified significant ecological constraints in and around the Nam Sang Wai, including main and secondary area of egretry flight-line. The development site is completely within the secondary area of egretry flight-line.

We therefore remain doubtful that the impact on foraging habitat loss for Great Cormorant and other waterbirds, disturbance impact on waterbirds in Kam Tin MDC and mitigation wetland are regarded as “negligible” and “low to moderate” respectively (Table E18 of EcoIA).

### **4. Cumulative impact**

It should be noticed that there is another planning application Y/YL-NSW/3 in adjacent and other planned development according to Nam Sang Wai OZP S/YL-NSW/8, CA worries that potential cumulative impact would cause significant disturbance on adjacent ecologically sensitive areas, including Yuen Long Flooding bypass and the active egretry at Tung Shing Lei. Since the development site lies within Wetland Buffer Area (WBA), The project proponent has to ensure that the integrity of wetland ecosystem in Deep Bay Area is maintained at all times.

We also worry that more commercial development, together with the proposed hotel development (Y/YL-NSW/3) within NSW region, would create more traffic problems,

followed by other environmental disturbance such as air and noise pollution. In particular, most of the roads in adjacent area are sub-standard, traffic congestion and road safety problems would be generated. With increasing numbers of coaches in the site, this would further trigger pond-filling activities in the name of providing parking space. We cannot see how these cumulative impacts had been tackled by the project proponent in full.

Yours faithfully



Ng Hei Man  
Assistant Campaign Manager

**Figure 1: Ecological constraints in and around the Nam Sang Wai site, including the main and secondary area of egretry flight-lines**

