



長春社 Since 1968

The Conservancy Association

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9th 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. A/YL-NSW/293

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

1. Not in line with the planning intention

According to the general planning intention of the approved Nam Sang Wai Outline Zoning Plan No. S/YL-NSW/8, the Plan is to “*conserve the ecological value of the fish ponds which form an integral part of the wetland ecosystem in the Deep Bay Area*”, and “*the area further away from the fish ponds is to protect the ecological integrity of the wetland ecosystem, and prevent development that would have a negative off-site disturbance impact on the ecological value of fish ponds*”. While We are very concerned that the proposed development is still large in scale and lies very close to fish ponds within the site and the vicinity of Wetland Buffer Area (WBA) under the Guidelines for Application for Developments within Deep Bay Area (TPB PG-No. 12C). We therefore cannot see how this planning application can achieve the above planning intention.

2. Incompatible development scale

A similar planning application A/YL-NSW/275 has once been submitted to Town Planning Board at the same site since November 2019. Compared with the previous application with the current one, we do not think the development scale has been substantially decreased. Please refer to the table below for reference.



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	A/YL-NSW/275	A/YL-NSW/293
Plot ratio (Domestic)	3.082	2.928
No. of Block (Domestic)	16 Residential Tower 34 Houses	14 Residential Tower 9 Houses
Building height	12-139mPD	12-139mPD
No. of storey	3-45	2-44
No. of units	3,814 Flats (Private) 34 Houses (Private)	3,556 Flats (Private) 9 Houses (Private)

The explanatory statement of “Undetermined” (“U”) zone mentioned that “*To realize a built-form which represents a transition from the Yuen Long New Town to the rural area, the development intensity should take into account the urban type developments immediately to the west of the “U” zone and the rural characteristics of the area to its north*”. With further urban expansion in Yuen Long during recent decades, the current rural landscape in Tung Shing Lane and its adjacent, such as Small Traders New Village, can be regarded as the remaining part that keeps intact in general. Based on the current development scale, we worry that the current rural landscape in the subject site acting as a transition between Yuen Long New Town and Yuen Long rural area would be loss.

3. Direct loss of fish ponds

From the Master Layout Plan for the proposed development, it is clear that some residential development would be built on the pond. Pond filling activities in the site will be resulted, but such act would lead to direct loss of fish ponds. While the fish ponds lie close to WBA and even Wetland Conservation Area (WCA), it was also very close the egretty in Tung Shing Lane. We expect that the ponds are still utilized by egrets and various waterbirds and form a close ecological linkage with Deep Bay wetland ecosystem.

Although one of the ponds has become a “lake” under the current application, we opine that the total area of wetland in the site would still be significantly reduced. Besides, we are also not sure if any associated works, such as draining out all water from the “lake”, earth work, would be proposed in the “lake”. Whether water quality



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of this “lake” would still be acceptable for egrets and other species during operation phase is also questionable. In this way, this pond/”lake” is no longer functional in ecological perspective, and is no differences from direct ecological loss.

4. Potential cumulative impacts

Over the past decade, many large-scale development applications inside WBA around Nam Sang Wai have been approved or submitted for approval. The entire region has been under high development pressure. Approving the captioned application would set undesirable precedent for similar applications for large-scale development in the area. Development would further encroach into lands with conservation and landscape values, decreasing overall quality of the environment.

Yours faithfully,

Ng Hei Man

Campaign Manager

The Conservancy Association