



長春社 Since 1968

The Conservancy Association

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31st January 2022

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,

Comments on the Section 12A Application No. Y/YL-MP/6

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 8,343 including 3,090 flats and 100 beds in RCHE, 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 9.3.1 section of the Explanatory Statement of Approved Mai Po and Fairview Park Outline Zoning Plan (S/YL-MP/6) mentions that *“is primarily to*



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improve and upgrade the existing temporary structures within the rural area to permanent buildings. Replacement housing for temporary structures shall not result in a total redevelopment in excess of a maximum building area of 37.2m² and a maximum building height of 2 storeys (6m).” However, the proposed application, comprising 14 residential blocks with 3 to 23 storeys and 6 non-residential blocks with 1-3 storeys, would be a large amendment to the original planning requirement. It is highly incompatible with the surrounding rural setting with low development density which is usually no more than 3 storeys high.

3. Cumulative impacts

Over the past decade, there were already cumulative losses of wetlands in the Deep Bay wetland ecosystem. For instance, 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 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,

Chow Oi Chuen

Campaign Officer

The Conservancy Association