



長春社 Since 1968

The Conservancy Association

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16th August 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 16 Application No. A/YL-ST/626

The Conservancy Association OBJECTS to the captioned application.

1. Not in line with the planning intention of Conservation Area (CA) zone

According to the approved San Tin Outline Zoning Plan (OZP) No. S/YL-ST/8, the planning intention of CA zone is *“to conserve the ecological value wetland and fish ponds which form an integral part of the wetland ecosystem in the Deep Bay Area. The “no-net-loss in wetland” principle is adopted for any change in use within this zone. The primary intention is to discourage new development unless it is required to support the conservation of the ecological integrity of the wetland ecosystem or the development is an essential infrastructure project with overriding public interest”*.

According to the gist of application, proposed temporary field education centre with ancillary shop and services public were proposed. However, we cannot see sufficient details to justify that such plan is either *“to support the conservation of the ecological integrity of the wetland ecosystem”* or *“an essential infrastructure project with overriding public interest”*. Therefore, it is not in line with the planning intention of CA zone.

2. Not in line with the Town Planning Board (TPB) PG-No. 12C

According to the TPB PG-No. 12C for Application for Developments within Deep Bay Area, part of the application site is located within Wetland Conservation Area



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(WCA). The planning intention of WCA is “to conserve the ecological value of the fish ponds which form an integral part of the wetland ecosystem in the Deep Bay Area. It comprises the existing and contiguous, active or abandoned fish ponds in the Deep Bay Area, which should all be conserved. New development within the WCA would not be allowed unless it is required to support the conservation of the ecological value of the area or the development is an essential infrastructural project with overriding public interest. Any such development should be supported by an ecological impact assessment to demonstrate that the development would not result in a net loss in wetland function and negative disturbance impact”. However, there are no brief overview on ecological condition of the project site and its surrounding environment. All potential environmental impacts caused by the work during construction and operation phase, such as water quality, noise and ecology, have not been fully evaluated. We doubt that it is against the planning intention of WCA, and therefore we do not think this is in line with the TPB PG-No. 12C.

3. Adverse environmental impacts

We worry that there would be several potential adverse environmental impacts caused by the application:

- No plans on land recovery: Various structures/uses would be temporarily proposed in the application site. However, no details are available to illustrate how the land would be recovered after the proposed temporary use.
- Adverse sewage impact: The applicant does not provide any details of sewage arrangement, such as design, collection, treatment, disposal of sewage, back-up plans, and so on. Besides, insufficient details are available to identify other sources of wastewater arising from operation, and how these pollution sources would be treated. We worry that if the above issues cannot be properly addressed, it may lead to serious environmental and hygiene problems within the application site and its surrounding area.
- Other sources of environmental impacts not clearly addressed: There are no site management and operational plans to describe issues such as number of expected visitors/users, crowd control, and so on. Regarding the proposed temporary environmental protection education and solar energy exhibition centre and souvenir shop, no details are available to describe their exact uses and activities, and whether additional wastewater would be generated during operation. All these would help identify source of environmental impacts and then suggest measures



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to minimize or mitigate potential environmental disturbance, but we cannot see the project proponent has attempted to address this.

Yours faithfully,

Ng Hei Man

Campaign Manager

The Conservancy Association