



長春社 Since1968

The Conservancy Association

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23rd September 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/8

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

1. Not in line with the planning intention of Wetland Buffer Area (WBA)

According to the Town Planning Board Guidelines for Application for Developments within Deep Bay Area (TPB PG-No. 12C), the application site is located within 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”.

A Section 12A application Y/YL-MP/3 has once been submitted to Town Planning Board at part of the site currently zoned “Recreation” in 2014 to facilitate a residential development project. We note that maximum building height, maximum numbers of storeys, numbers of units of proposed development (Table 1) are higher than the previous one.

Table 1 Development parameter of Y/YL-MP/3 and Y/YL-MP/8

	Y/YL-MP/3	Y/YL-MP/8
Maximum building height	<6.6m	<52.45m



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Maximum no. of storeys	3	16
No. of units	106	1,249

In general, it appears that much higher level of development would be resulted in the application site. Such large development scale would potentially induce adverse off-site disturbance impacts on adjacent wetland in WCA, affect ecological function and integrity of Deep Bay wetland ecosystems. We opine that this is definitely not in line with the TPB PG-No. 12C and planning intention of WBA.

2. Adverse ecological impacts

Despite provision of Ecological Impact Assessment (EcoIA), we are still doubtful that at least some of the potential ecological impacts remains unsolved:

- i. Disturbance on bird species at Ngau Tam Mei Drainage Channel (NTMDC): From the EcoIA, high diversity of ardeids such as Black-faced Spoonbill, Chinese Pond Heron, Little Egret, Grey Heron, Great Egret, etc., can be spotted at NTMDC in the east of the application site. Off-site negative impact, such as construction noise during construction phase and human activities during operation phase, would adversely affect foraging behavior of these birds. We still worry how these impacts can be avoided or mitigated.
- ii. Disruption on flight lines of waterbirds: Figure 4, 4a and 4b of the EcoIA revealed that apart from the major flight line observed along NTMDC, a minor flight line (Flight line No. 7) was recorded passing over the application site towards Fairview Park. Meanwhile, the Proposed Residential Cum Passive Recreation Development within “Recreation” Zone and “Residential (Group C)” Zone at Various Lots in DD 104, Yuen Long, N.T.” EIA report (No. EIA-220/2014) once mentioned that “*The birds observed in the present surveys were found flying over Fairview Park and other developed areas like Palm Springs, Royal Palms, and nearby village house developments*”. The previous Section 16 Application A/YL-MP/205 and Section 12A Application Y/YL-MP/6 also mentioned that flight line was observed passing over the application site. Viewing the current maximum building height (i.e. <52.45m) and numbers of storeys (i.e. 16 storeys), we worry that potential disruption on



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- flight lines on waterbirds would be anticipated.
- iii. Light disturbance: Additional light source from residential towers and open space would pose disturbance on birds and other wildlife. However, we cannot see how the applicant attempts to evaluate potential light impact properly in both day time and night time during the construction and operation phase. Despite provision of “*a thick planting strip along the site boundary*” to screen out the disturbance impact from the application site, it is doubtful how the proposal can properly minimize light disturbance from high-rise residential towers. We also worry that the proposed landscape pond, acting as a disturbance buffer, would generate additional glare and this might bring light source even more close to NTMDC.
 - iv. Bird collision: Even though Section 7.2 of the EcoIA mentions that the current residential development would not have extensive reflective surfaces, the height of residential towers, as mentioned above, would be substantial and they tend to have more areas of glass. Therefore, risk on bird collision would still be an issue. Meanwhile, nocturnal avian collision with buildings is not clearly identified and evaluated in the EcoIA.

3. Potential cumulative impacts

We note that some development projects were not included in assessing cumulative impacts, such as Y/YL-MP/6, Y/YL-MP/7 (just situated at the south of the application site), A/YL-MP/287, Northern Link, and so on. We worry that exclusion of some development projects would downplay interactions between the environmental impacts of the project and the environmental impacts of other developments.

Over the past decade, there were already cumulative loss of wetlands in 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 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



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ecosystem, and set undesirable precedent for similar applications for large-scale development in the area.

Yours faithfully,

Ng Hei Man

Campaign Manager

The Conservancy Association