

Secretary, Town Planning Board
15/F, North Point Government Offices
333 Java Road, North Point, Hong Kong
(E-mail: tpbpd@pland.gov.hk)



香港觀鳥會
THE
HONG
KONG
BIRD
WATCHING
SOCIETY

Since 1957 成立

10 Dec 2013

Dear Sir/Madam,

Objection on planning application for Proposed Residential Development, Filling and Excavation of Land (A/YL-NSW/224)

The Hong Kong Bird Watching Society (HKBWS) would like to raise an objection to the planning application for the proposed residential development, filling and excavation of land at Nam Sang Wai, Yuen Long (A/YL – NSW/224) under Section 16.



國際鳥盟準成員
BirdLife International
Partner Designate

1. Wetland Buffer Area and “Undetermined” Zoning

The application site is located within the wetland buffer area (WBA) which is intended to “protect the ecological integrity of the fish ponds and wetland within the Wetland Conservation Area (WCA) and prevent development that would have a negative off-site impact on the ecological value of fish ponds”¹. The application site is located within the “Undetermined” (U) zone of the Approve Nam Sang Wai Outline Zoning Plan (OZP) No. S/YL-NSW-8. As stated in this OZP, the planning intentions of, “the area further away from the fish ponds is to protect the ecological integrity of the wetland ecosystems and prevent development that would have a negative off-site disturbance impact on the ecological value of fish ponds”².

2. Improper Ecological Impact Assessment

It is unclear on what basis the conclusion of, “no worsen ecological impact due to the Proposed Scheme” and, “ecological impact during construction phase is unlikely to be significant”³ are drawn from. Since no detailed ecological survey data of the application site and its surroundings were provided, there is no scientific data to support these conclusions. The survey effort and types of

¹ Town Planning Board PG-No. 12B – Town Planning Board Guidelines for Application for Developments within the Deep Bay Area Under Section 16 of the Town Planning Ordinance

² Town Planning Board – Approved Nam Sang Wai Outline Zoning Plan No. S/YL-NSW/8

³ Llewelyn-Davies Hong Kong Limited (2013). Section 16 Planning Application in Support of Proposed Residential Development in “Undetermined” zone at Tung Shing Lei, Nam Sang Wai, Yuen Long.

surveys conducted in order to produce a proper ecological impact assessment remains questionable. The Applicant fails to identify the potential impacts to the flight path of ardeids from the Tung Shing Lane Egrettry. It should be noted that the application site comprises of 25.6% of the flight lines from this egrettry⁴. Finally, we urge the Town Planning Board (TPB) to provide information as to whether the Agriculture, Fisheries and Conservation Department (AFCD) has reviewed the impact assessment report.

3. Consideration for Cumulative Impacts and impacts to Great Cormorant night roost

As stated in the Nam Sang Wai OZP, “development within the areas has to be comprehensively planned as piecemeal development or redevelopment would have the effect of degrading the environment and thus jeopardizing the long-term planning intention of the areas”. Cumulative ecological impacts to the fishponds of Deep Bay area need to be carefully assessed given that a number of other residential developments have already been proposed in close proximity of the application site. This includes application numbers A/YL-NSW/223, A/YL-NSW/218 and A/YL-NSW/225, all of which are approximately less than 500 m from the application site (Figure 1). Furthermore, all these developments are located in close proximity of a Great Cormorant night roost of significant size, located just north of Kam Tin River (just over 500 m away from the application site) (Figure 1). We are concerned that the disturbances arising from all of these housing developments would cumulatively create a significant amount of disturbances resulting in the abandonment of these night roosts.

The HKBWS respectfully requests the Town Planning Board to reject the current application under review. Thank you very much for your attention and consideration.

Yours faithfully,

A handwritten signature in black ink, consisting of stylized cursive letters, likely representing the name of the signatory.

⁴ Llewelyn-Davies Hong Kong Limited (2013). Section 16 Planning Application in Support of Proposed Residential Development in “Residential (Group D)” and “Undetermined” Zones at Tung Shing Lei, Nam Sang Wai, Yuen Long.

Jocelyn Ho
Senior Conservation Officer
Hong Kong Bird Watching Society

cc:

Ms. Eva Yau, Nature Conservation Officer (Yuen Long), Agriculture, Fisheries
and Conservation Department

Ms. Lily Chiu, District Lands Officer (Yuen Long), Lands Department

Figure 1 – Proposed Residential Developments within 500 m of the Application Site

