



BY EMAIL ONLY

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

30 April 2021

Dear Sir/Madam,

Section 12A Application for rezoning of Nam Sang Wai Outline Zoning Plan from "Other Specified Uses" annotated "Comprehensive Development to include Wetland Restoration Area" to "Other Specified Uses" annotated "Comprehensive Development to include Wetland Restoration Area 1" (Application No. Y/YL-NSW/6)

Green Power would like to draw your kind attention to our grave concerns about the above-captioned application for amendment of plan.

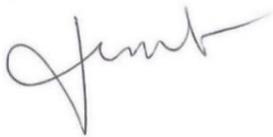
1. The application site falls within the Wetland Buffer Area (WBA) of the Deep Bay Area that serves an ecological function to protect the globally important wetland — the Mai Po Ramsar site. According to the TPB's guideline¹, WBA intends to “...prevent development that would have a negative off-site disturbance impact on the ecological value of fish ponds”. It is questionable that the proposed development project is compatible with this zoning intention.
2. The proposed project will introduce thousands of new residents to the WBA and it will unavoidably bring long-term human disturbances to the adjacent Wetland Conservation Area (WCA). In particular, the application site is next to the natural distribution range of the endemic Hong Kong Bent-winged Firefly (*Pteropytx maipo*)² and close to the night roosting site for the considerable number of winter visitor Great Cormorant (*Phalacrocorax carbo*)³. A severe light pollution problem during the night time on these species is anticipated.
3. Development of high-rise buildings at the application site, as suggested by the project proponent, will also permanently block a certain existing flight paths of the avifauna. According to the explanatory statement of the Approved Nam Sang Wai Outline Zoning Plan (No. S/YL-NSW/8)⁴, the existing land use of the application site should “be in line with the rural setting which is mainly low-rise residential developments and village houses...” and

“development or redevelopment shall not result in a total development or redevelopment intensity in excess of a total plot ratio of 0.4 and a maximum building height of 6 storeys”. Any relaxation of the plot ratio and/or building height restriction will cause adverse ecological and visual impact to the WBA.

4. We opine that the Board’s decision should comply with the TPB’s guideline¹, in which *“development/redevelopment which may have negative impacts on the ecological value of the WCA would not be supported by the (Town Planning) Board, unless the ecological impact assessment can demonstrate that the negative impacts could be mitigated through positive measures”*.

Thank you very much for your kind attention. For any inquiries, please contact the undersigned at Green Power (T: 39610 200, F: 2314 2661, Email: wflo@greenpower.org.hk).

Yours faithfully,



LO Wing-fung
Senior Education & Conservation Officer
Green Power

References:

- ¹ Town Planning Board (2014) Application for Developments within Deep Bay Area under Section 16 of the Town Planning Ordinance. (TPB PG-No. 12C).
- ² World Wide Fund - Hong Kong (2019) Mai Po Nature Reserve Management Plan 2019-2024.
- ³ Asia Ecological Consultants Limited (2010) Environmental Assessment Study for the Nam Sang Wai Ecological Impact Assessment (Application No. DPA YL-NSW/12).
- ⁴ Town Planning Board (2006) Approved Nam Sang Wai Outline Zoning Plan No. S/YL-NSW/8.