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香港分會

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Our Ref.: SHK /LDD 7/15
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Chairman and members

Town Planning Board

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

By E-mail ONLY

Dear Sir/Madam,

Re: Proposed Comprehensive Development with Wetland Enhancement (including House Flat, Wetland Enhancement Area, Nature Reserve, Visitors Centre, Social Welfare Facility, Shop and Services, Filling of Land/Pond and Excavation of Land) in Nam Sang Wai and Lut Chau, Yuen Long (A/YL-NSW/242)

WWF would like to lodge our objection to the captioned application.

“No-net-loss in wetland” principle not achieved

The development proposal falls within the “OU(CDWEA)” area which is subject to the “no-net-loss in wetland” principle to ensure that development would result in no decline in wetland functions of the project site. However, Table 33 and Section 1.8.22 from the Ecological Impact Assessment (EcoIA) of the application shows that there will be a loss of 10.4 ha of wetland area or “gross wetland area” including habitats such as reedbeds, wet grassland and pond bunds should this proposed project goes ahead. Such a large loss of wetland habitat will no doubt affect the ecological function of the wetlands system. Although the project proponent mentions measures to mitigate/compensate this loss, we do not think the functions of the existing wetland system can be fully maintained as explained in the sections below, This substantial loss of wetland contradicts with the essence of the “no-net-loss in wetland” principle and hence we think this application should not be approved by the Town Planning Board.

Converting existing fish ponds into reedbeds is not in line with the planning intention

According to the planning intention of the existing zoning of the subject site in Nam Sang Wai (NSW), it is an “Other Specified Uses” annotated “Comprehensive Development and Wetland Enhancement Area” (“OU(CDWEA)”) zone for conservation and enhancement of ecological value

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Chairman: Mr Edward M Ho
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and functions of the existing fish ponds. However, the project proponent proposes to recreate an area of wet reedbeds in the commercial fishponds at the northeast of the proposed WEA to mitigate for the loss of the reedbeds due to the residential development (please see Section 1.11.4 of the application's Planning Statement). We consider that the proposed wet reedbeds will undermine the existing ecological function of the commercial fishponds. One distinctive ecological feature of commercial fishponds is the management practice of pond drain-down that makes small fish and other aquatic animals available to water birds¹. However, the drain-down process and its benefits of providing plenty of food for water birds will be hindered in reedbed ponds which will be covered with dense vegetation. The application's EcolA had shown that a drained fish pond in Nam Sang Wai in January 2011 had attracted 90 globally threatened Black-faced Spoonbills (please see Section 1.5.17). As such, the provision of reedbeds at the expense of existing fish ponds have neglected the latter's ecological function and is not in line with the current planning intention of the "OU(CDWEA)".

Secondary loss of fish pond habitat and ecological function of the Lut Chau Nature Reserve

The project proponent views that enhancement of the fish ponds in Lut Chau Nature Reserve (Lut Chau) can compensate for the loss of fish ponds arising from the residential development and the establishment of new reedbeds. The enhancement will change the concerned fish ponds and may result in the loss or reduction of their original ecological function. The project proponent has failed to demonstrate that the loss of the Lut Chau fish ponds' original ecological function could be adequately and fully compensated by the proposed mitigation measures. In particular, the creation of wet reedbeds in the fish ponds in the proposed WEA to compensate for the loss of contiguous reedbeds due to the development is questionable because fish ponds and reedbeds are different wetland habitats that support different wetland communities. Similarly, the project proponent failed to demonstrate that the enhancement of the existing fish ponds at Lut Chau can fully compensate for the loss of fish ponds due to the residential development and the establishment of new reedbeds in Nam Sang Wai. The Lut Chau commercial fish ponds, which have been intensively managed for over 50 years, have their own unique ecological function such as the floating fish feed that can attract over a thousand Black-headed Gulls in the winter time that no other Deep Bay fish ponds can perform. In contrast to Lut Chau, Nam Sang Wai fish ponds contain both abandoned and commercial fish ponds while the latter's management intensity and scale is comparatively low due to the water quality. However, Nam Sang Wai fish ponds, with less human disturbance, less management, can provide a mosaic of wetland habitats. Such off-site compensatory mechanism will

¹ Aspinwall (1996) Study on the Ecological Value of Fish Ponds in the Deep Bay Area. Planning Department, HKSAR Government.

only lead to the secondary loss of Lut Chau fish ponds' original ecological function and habitats and is not fully addressed by the project proponent.

Potential occurrence of natural succession at the reedbed ponds

According to Section 1.11.4 of the Planning Statement, reedbed ponds with interface-structured are designed for the purposes of maintaining the existing reed areas and encouraging more diverse bird species to use the reedbed ponds within the WEA. From the pond design, it is understood that reedbed ponds will contain shallower water portion and deeper water portion. The reed portion will have a water depth of 20-30cm and the open water portion will have a maximum of 2.5m deep so as to control the reeds from encroaching into open water area. It is also believed that the interface between the reedbed and open water portion will attract a wide range of bird species to use. However, the project proponent has not considered the gradual accumulation of fallen reed materials and sediments from the erosion of pond bunds in the reedbed and pond bottom. This will lead to the ponds becoming shallower and natural succession will happen in which other plants including terrestrial species will invade. Eventually the reedbed ponds will dry up and turn into a terrestrial habitat. We view that merely monitoring the spatial change of reedbed encroachment proposed by the project proponent is not adequate to manage the reedbed ponds sustainably. A management plan should be provided to show how succession can be prevented from occurring and to demonstrate that the reedbed ponds will function effectively in both near and long term.

Functionality of the mitigation measures has not been addressed

The mitigation measures will only be commenced prior to the construction phase but they need some time before the recreated reedbeds to become fully established and the associated wildlife to colonise. WWF thinks that to mitigate the loss of wildlife habitats, habitat recreation or enhancement should be successfully established first before construction can commence so that effective refuge will be available for the displaced wildlife species.

Premature to approve as long as a committed conservation agent is not identified

As the proposed project lies in one of the 12 Priority Sites under the New Nature Conservation Policy, the Public-Private Partnership (PPP) approach should be adopted in which a conservation agent is required to manage the ecologically sensitive portions of the subject site. Since the conservation partner will play a critical role to ensure that the long-term management of the wetland can be successfully implemented and monitored, we consider that a committed and competent agent must be provided by the project proponent at this stage for the Town Planning Board

Members' considerations. Without such information, the Town Planning Board should reject the captioned application.

Neglecting the ecological impact of the access bridge over Shan Pui River

A road bridge was proposed at Shan Pui River to link the proposed development to the Long Ping West Station via Yuen Long Industrial Estate. The proposed connecting bridge will cut across the inter-tidal Shan Pui River where a wide range of birds have been recorded using the area for foraging and roosting. According to Bird Watching Society's record at the Shan Pui River and the adjoining mudflat since winter 2010, 45 and 37 bird species had been recorded respectively, including ardeids, waders, waterfowls, raptors, gulls and etc (please see Appendix 1). However, the ecological impacts of the proposed bridge, particularly to the bird species during both the construction and operation phases have not been adequately assessed. For instance, the design of the bridge including its height and the future traffic may pose a significant impact to the bird usage in the area and appropriate mitigation measures will be needed. We urge the Town Planning Board not to approve the application as the project proponent has neglected to consider the road bridge's ecological impact.

We would be grateful if our comments could be considered by the Town Planning Board.

Thank you for your consideration.

Yours faithfully,

A handwritten signature in blue ink, appearing to read 'Tobi Lau'.

Tobi Lau (Mr.)
Conservation Officer, Local Biodiversity

Appendix 1 Bird usage at the Shan Pui River and the adjoining mudflat since winter 2010

SP River	Max of Abundance	SP River Mudflat	Max of Abundance
Barn Swallow	1	Black Kite	1
Black Kite	2	Black-faced Spoonbill	54
Black-capped Kingfisher	1	Black-headed Gull	1698
Black-crowned Night Heron	1	Black-winged Stilt	153
Black-faced Spoonbill	18	Chinese Pond Heron	22
Black-headed Gull	1471	Collared Crow	2
Black-winged Stilt	130	Common redshank	2
Chinese Bulbul	1	Common Buzzard	1
Chinese Pond Heron	18	Common Greenshank	140
Cinereous Tit	1	Common Kingfisher	2
Collared Crow	2	Common Moorhen	8
Common Greenshank	91	Common Redshank	20
Common Kingfisher	2	Common Sandpiper	7
Common Moorhen	4	Common Teal	90
Common Pochard	3	Eurasian Curlew	5
Common Redshank	6	Eurasian Spoonbill	1
Common Sandpiper	7	Eurasian Teal	13
Common Teal	59	Eurasian Wigeon	100
Dunlin	5	Garganey	1
Dusky Warbler	4	Great Cormorant	119
Eurasian Curlew	1	Great Egret	81
Eurasian Wigeon	5	Greater Spotted Eagle	1
Garganey	1	Green Sandpiper	1
Great Cormorant	97	Grey Heron	85
Great Egret	43	Heuglin's Gull	2
Grey Heron	60	Intermediate Egret	1
Heuglin's Gull	1	Little Egret	75
Japanese White-eye	2	Marsh Sandpiper	25
Little Egret	30	Northern Pintail	140
Little Ringed Plover	1	Northern Shoveler	700
Marsh Sandpiper	41	Pied Avocet	610
Northern Pintail	3	Red-billed Starling	230
Northern Shoveler	250	Spotted Redshank	75
Oriental Magpie Robin	1	Tufted Duck	16
Osprey	1	White-breasted Waterhen	8
Pied Avocet	796	White-throated Kingfisher	1
Pied Harrier	1	Wood Sandpiper	3
Pied Kingfisher	1		
Plain Prinia	1		
Spotted Redshank	79		
Tufted Duck	68		
White-breasted Waterhen	8		
Whimbrel	9		
White-throated Kingfisher	1		
Wood Sandpiper	1		

Data source: Hong Kong Bird Watching Society's Waterbird Count and the fishpond baseline record.