世界自然基金會
香港分會

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Dr. CHUI Ho Kwong, Samuel, JP
Director of Environmental Protection
16/F, East Wing, Central Government Offices,
2 Tim Mei Avenue, Tamar, Hong Kong
(Email: eiaocomment@epd.gov.hk)

By email only

Dear Dr. Chui,

Proposed Comprehensive Residential Development with Wetland Restoration Area at Various Lots in DD104 and Adjoining Government Land, Wing Kei Tsuen, Nam Sang Wai, Yuen Long
(PP-695/2025)

WWF would like to provide the following comments and recommendations to the captioned Project Profile (PP) on the proposed comprehensive development at Wing Kei Tsuen (hereafter referred to as the Project Site).

Impacts to recognised biodiversity hotspot and associated at-risk species

The Project is located within the globally-recognised **Inner Deep Bay and Shenzhen River Catchment Area Key Biodiversity Area (KBA)**[1] and **Important Bird Area (IBA)**[2], which support a wide range of wetland-dependent species, of which many are globally-threatened.

In addition, WWF-Hong Kong, in association with a group of local experts (e.g. the Hong Kong Bird Watching Society, Kadoorie Farm and Botanic Garden, and local researchers), published a report titled "**The State of Hong Kong Biodiversity 2025**" (The Report) in March, together with the "**Hong Kong Terrestrial Biodiversity Hotspot Map 2025**"[3]. The study concluded that 26% (232 out of 886) of the assessed terrestrial and freshwater species in Hong Kong are at risk of local extinction; and identified a total of 27 biodiversity hotspots in Hong Kong.

[1] https://www.keybiodiversityareas.org/site/factsheet/16078
[2] https://datazone.birdlife.org/site/factsheet/inner-deep-bay-and-shenzhen-river-catchment-area
[3] https://www.wwf.org.hk/en/biodiversity/hkbiodiversity2025/

The PP indicates that the Project will interfere directly and indirectly with the KBA and IBA, which is also identified as the "Inner Deep Bay" hotspot identified in our joint study. With the richest bird diversity and abundance across Hong Kong, this hotspot ranks top among all 27 hotspots; data and information from our expert group have shown that the "Inner Deep Bay" hotspot support at least **158 species of High or Moderate Risk** of local extinction.

We, therefore, recommend that the Project Proponent should pay due attention to the identified hotspot and the at-risk species present in the area during the course of the EIA. Encroachment and disturbance (particularly during the operation phase of the Project) to these important habitats should be avoided as much as possible.

Ecological integrity of the fishponds and wetlands

Since the Project Site is within the Wetland Buffer Area (WBA) and immediately adjacent to the Wetland Conservation Area (WCA), we are concerned that the proposed development may pose adverse ecological impacts to the surrounding natural environment and biodiversity. In the absence of detailed information of the PP including the wetland restoration area, we are worried that the proposed development may be incompatible to the intention of the WBA, which "… *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*". We opine that the development will have negative off-site disturbance impact on the ecological value of the fishponds and wetland within the WCA and that there is also sufficient information on the maintenance and management plan, in particular the arrangement of funding and monitoring protocol to ensure the long-term management of the restored wetland should be well presented in the EIA study.

Potential impacts on water quality during the construction phase

The Project Site falls within the Deep Bay catchment and thus any discharge from the development would potentially increase the pollution loading of Deep Bay, impacting the water quality of the area. As such, we opine that the additional site runoff and sewage discharges during the construction phase will potentially impact the Deep Bay ecosystem due to the deterioration of the water quality. We view the Project Proponent should be required to provide appropriate mitigation measures/facilities in order to prevent the water quality of the Deep Bay area being adversely affected.

Potential impacts on the Kam Tin Main Drainage Channel

The Project Proponent fails to identify the potential ecological impacts on the Kam Tin Main Drainage Channel (KTMDC), which runs at about 200m southwest of the Project Site. KTMDC is connected to the intertidal mudflat of Inner Deep Bay and is used by large numbers of waterbirds. We consider that the Project Proponent should explicitly address the possible ecological impacts on waterbirds of conservation importance such as the globally Endangered Black-faced Spoonbill *Platalea minor*, the Grey-headed Lapwing

Vanellus cinereus that being assessed as high risk of extinction in Hong Kong in the Report, which are regularly recorded in the KTMDC.

Thank you very much for your kind attention and consideration.

Kind regards,

Mr. Tobi Lau
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WWF Hong Kong
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