

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



By email only

26 February 2016

香港觀鳥會  
THE  
HONG  
KONG  
BIRD  
WATCHING  
SOCIETY  
Since 1957 成立

Dear Sir/Madam,

**Objection to the planning application for Proposed House (New Territories Exempted House – Small House) at Lam Tsuen San Tsuen, Tai Po (A/NE-LT/552)**

The Hong Kong Bird Watching Society (HKBWS) would like to maintain our objection to the planning application A/NE-LT/552 for review under Section 17. We still consider that small house development should be confined to the “Village Type Development” zone and should not encroach into the “Agriculture” zone. Our concerns regarding the captioned planning application are still **valid** (please refer to Attachment 1).

The HKBWS respectfully requests the Town Planning Board to **reject** the application.

Thank you very much for your attention and consideration.

Yours faithfully,

Woo Ming Chuan  
Conservation Officer  
The Hong Kong Bird Watching Society

cc.  
The Conservancy Association  
Designing Hong Kong  
Kadoorie Farm and Botanic Garden  
WWF – Hong Kong



## Attachment 1

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



By email only

18 December 2015

香港觀鳥會  
THE  
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Since 1957 成立

Dear Sir/Madam,

### **Objection to the planning application for Proposed House (New Territories Exempted House – Small House) at Lam Tsuen San Tsuen, Tai Po (A/NE-LT/552)**

The Hong Kong Bird Watching Society (HKBWS) would like to maintain our objection to the planning application A/NE-LT/552 for review under Section 17 based on the following reasons:

#### **1. Not in line with the planning intention of the “Agriculture” (AGR) zoning and adverse ecological impacts of the proposed development**

The application site is located within the ARG zone, where the planning intention is “to retain and safeguard good quality agricultural land/farm/fish ponds for agricultural purposes. It is also intended to retain fallow arable land with good potential for rehabilitation for cultivation and other agricultural purposes”. From aerial photographs, there are still active agricultural lands in the surroundings of the application site (Figure 1).

According to HKBWS bird records, approximately 293 species of birds are recorded in the agricultural lands in Hong Kong. This constitutes 55% of the total bird species in Hong Kong<sup>1</sup> and 20% of the total bird species in China<sup>2</sup>. Among them, almost half of the species recorded (140 species) are regarded as of conservation importance. This indicates that the agricultural land in Hong Kong supports a high diversity of birds, thus should be adequately protected and managed.

However, the proposed small house development would lead to a direct loss of arable agricultural lands in the Lam Tsuen area, which is not in line with the above planning intention. Furthermore, the approval of this application would set an undesirable precedent for future developments within the AGR zone in the area. For the past 10

<sup>1</sup> The total number of bird species in Hong Kong is 531.

<sup>2</sup> According to the CBR Checklist of Birds of China v3.0 (2013), the total number of bird species in China is 1434.



years or so, the approval rate of small houses applications in AGR zones is over 60%<sup>3</sup>, thus agricultural land is vulnerable to small house development. We are concerned the further loss of arable agricultural lands would lead to adverse impact on the farmland bird community caused by the loss in foraging and roosting habitats. We, therefore, urge the Board to **reject** this planning application and small house development should be confined to the “Village Type Development” zone.

## **2. Justifications for the decision and comments made by Government departments and the Town Planning Board (TPB)**

According to the Hong Kong Planning Standards and Guidelines (HKPSG), Chapter 10, Section 2.1 (ii), the TPB has the responsibility to, “*restrict uses within conservation zones to those which sustain particular landscapes, ecological and geological attributes and heritage features*”<sup>4</sup>. We note that all other Government bureaux/departments are also bound to the HKPSG, the Agriculture, Fisheries and Conservation Department (AFCD) and the Planning Department (PlanD) has the responsibility to advise the TPB on the ecological and planning aspects in particular<sup>5</sup>. Given AFCD’s mission to conserve natural environment and safeguard the ecological integrity<sup>6</sup> and the proposed development is not in line with the planning intention of the statutory zoning, HKBWS would also expect AFCD and PlanD to object this application. Should AFCD, PlanD or TPB feels otherwise, we urge that the appropriate justifications are provided.

The HKBWS respectfully requests the Town Planning Board to take our comments into consideration and **reject** the current application.

Thank you for your kind attention and consideration.

Yours faithfully,



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<sup>3</sup> Annex of LegCo Question 17 (6 Feb 2013) - Land reserved for building New Territories small houses. Retrieved from [http://gia.info.gov.hk/general/201302/06/P201302060426\\_0426\\_106939.pdf](http://gia.info.gov.hk/general/201302/06/P201302060426_0426_106939.pdf)

<sup>4</sup> Hong Kong Town Planning Standards and Guidelines – Chapter 10 Conservation. Section 2.1 (ii).

<sup>5</sup> AFCD Role of Department. Available at: [http://www.afcd.gov.hk/english/aboutus/abt\\_role/abt\\_role.html](http://www.afcd.gov.hk/english/aboutus/abt_role/abt_role.html)

<sup>6</sup> AFCD Vision and Mission. Available at: [http://www.afcd.gov.hk/english/aboutus/vision\\_mission/abt\\_vision\\_mission.html](http://www.afcd.gov.hk/english/aboutus/vision_mission/abt_vision_mission.html)

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**Figure 1.** Google Earth aerial photograph of the active agricultural lands in the Lam Tsuen San Tsuen area and its surroundings (photograph taken on 14 April 2015) (the approximate location of the application site is indicated by the red arrow).

