

Secretary, Town Planning Board
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By email only

香港觀鳥會
THE
HONG
KONG
BIRD
WATCHING
SOCIETY

13 January 2016

Dear Sir/Madam,

Comments on the draft Yi O Outline Zoning Plan No. S/I-YO/1

Since 1957 成立

The Hong Kong Bird Watching Society (HKBWS) would like to make a representation and raise our comments on the draft Yi O Outline Zoning Plan (OZP) No. S/I-YO/1.

1. Ecological features in Yi O

In the Explanatory Statement of the draft Yi O OZP¹, some species of conservation concern were recorded in the Yi O area, including the globally endangered² Romer's Tree Frog (*Liuixalus romeri*) and Rice Fish (*Oryzias curvinotes*) which is of Global Concern³. Moreover, it mentioned "*the woodlands and streams in the Area are worthy of protection as they provide habitats which support the fauna and flora species of conservation importance*"⁴. In the previous Town Planning Board (TPB) Paper for the Yi O Development Permission Area (DPA) plan, the Director of Agriculture, Fisheries and Conservation also stated "*woodlands together with the streams nearby are important habitats for the protected Romer's Tree Frogs which have been recorded in Yi O*"⁵. Therefore, we consider that the streams and their riparian zones on the two sides of the banks and the woodlands at Yi O San Tsuen (Figure 1) should be protected by conservation zonings, such as "Green Belt (1)" (GB(1)), "Coastal Protection Area" (CPA), and/or "Conservation Area" (CA).



¹ Sections 5.3 and 7.2.1 of the Explanatory Statement of S/I-YO/1

² Michael Wai Neng Lau, Zhao Ermi. 2004. *Liuixalus romeri*. The IUCN Red List of Threatened Species 2004: e.T58794A11830853. <http://dx.doi.org/10.2305/IUCN.UK.2004.RLTS.T58794A11830853.en>. Downloaded on 13 January 2016

³ Fellowes, J.R., Lau, M.W.N., Dudgeon, D., Reels, G.T., Ades, G.W.J., Carey, G.J., Chan, B.P.L., Kendrick, R.C., Lee, K.S., Leven, M.R., Wilson, K.D.P. and Yu, Y.T. (2002). Wild animals to watch: Terrestrial and freshwater fauna of conservation concern in Hong Kong. *Memoirs of the Hong Kong Natural History Society* No. 25, 123-160.

⁴ Section 7.1.1 of the Explanatory Statement of S/I-YO/1

⁵ Section 4.2 of TPB Paper No. 9226



Furthermore, the approval rate of small houses applications in GB zone was about 57%⁶ for the past 10 years or so. We therefore consider that GB zones should be replaced by other conservation zonings, such as GB(1), CPA, and/or CA to alleviate the small house development pressure and for the protection of the natural habitats which are of conservation importance.

2. Farming in Yi O

Back in 2012, the Authority received complaints against tree felling, vegetation clearance and excavation activities in the Yi O area⁷. Later that year, a DPA plan was gazetted to prevent haphazard and uncontrolled developments and to ensure proper planning control and enforcement. In our site visit conducted in late 2015, diggers, wide footpaths, some recently excavated ditches and water system were seen in the area (Figure 2). Also, part of the area at Yi O San Tsuen and Yi O Kau Tsuen are currently under active cultivation. We are uncertain if the land owner and the agricultural company in charge have any concrete, detailed, long term, environmental and ecologically sustainable plan for the farming activities/production in Yi O. Nevertheless, we consider that eco-friendly farming practices should always be adopted and wet agricultural lands should be maintained in order to protect the biodiversity in the area. Any diversion of streams, filling of land, or excavation should not be conducted without the permission from the TPB and the relevant Departments.

3. Protecting the farmland habitat

Many of the actively cultivated agricultural lands and their nearby areas are zoned as “Agriculture” (AGR), which has the planning intention of retaining and safeguarding good quality agricultural land for cultivation and agricultural purposes. However, for the past 10 years or so, the approval rate of small houses applications in AGR zone was about 63%⁶; thus, agricultural lands in AGR zoning is vulnerable to small house development.

In the draft Yi O OZP, almost the entire AGR zone at Yi O San Tsuen is within the Village Environ (Figure 3). We are concerned the AGR zone would give villagers a false impression that the area is a land reserve for village development. In order to protect the farmlands in Yi O, we consider that the use “House” (small house development) should be replaced by “House (redevelopment only)” in Column 2 of the AGR zone (i.e. similar to the AGR(2) zoning proposed by Green Groups in their

⁶ 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

⁷ Section 2.5 of TPB Paper No. 9226

representations for the draft Lai Chi Wo OZP), such that the small house development pressure is removed but still respects the re-development rights of villagers.

Such restrictive zoning is important as it, 1) truly respects and protects "farmland" itself by limiting its use to cultivation only, 2) truly respects and conserves the multiple values of farmland (i.e. its cultural value, landscape value, ecological value, and acting as an open space, a buffer zone and a wildlife corridor), and 3) truly respects and appreciates the farmers who are farming the area. Therefore, we consider that the AGR zones in the Plan Area should be replaced with a zoning that more accurately reflects its planning intention (i.e. AGR(2)) or other conservation zonings (e.g. GB(1)/CPA/CA).

We hope that the Town Planning Board would take our comments into consideration and thank you for your kind attention.

Yours faithfully,



Woo Ming Chuan
Conservation Officer
Hong Kong Bird Watching Society

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

Figure 1. The woodlands at Yi O San Tsuen under AGR zoning (roughly indicated by the red circles). The map is produced by overlaying the current OZP and the habitat map provided in Figure 4a of the Planning Report on Yi O.

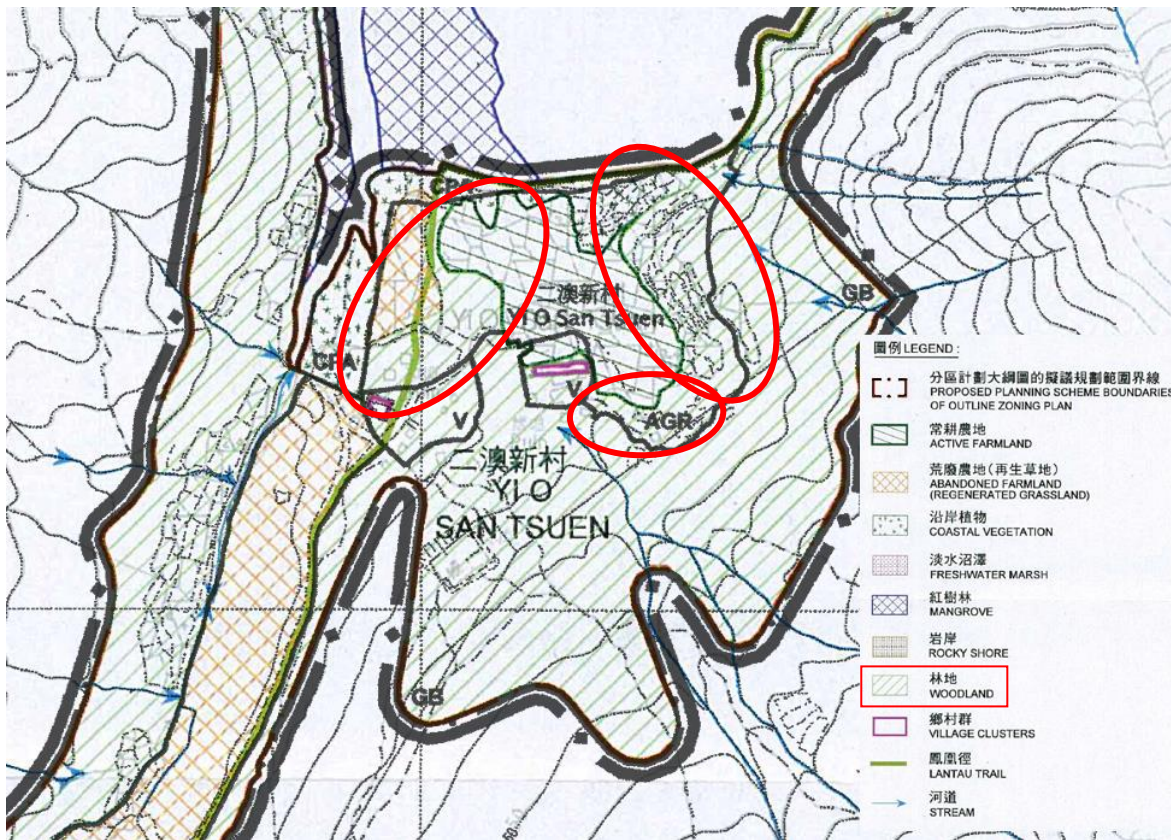


Figure 2. Diggers, wide footpaths, recently excavated ditches and water system were seen in Yi O during our site visit in late 2015.



Figure 3. Almost the entire AGR zone at Yi O San Tsuen is within the Village Environ (Plan 3 of TPB Paper No. 10016)

