

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

Dear Sir/Madam,

Objection to the planning applications for Proposed Houses (New Territories Exempted Houses – Small Houses) at Tsiu Keng, Sheung Shui (A/NE-KTS/408, A/NE-KTS/409, A/NE-KTS/410, A/NE-KTS/411 & A/NE-KTS/414)

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The Hong Kong Bird Watching Society (HKBWS) would like to maintain our objection to the planning applications A/NE-KTS/408, A/NE-KTS/409, A/NE-KTS/410, A/NE-KTS/411 & A/NE-KTS/414 currently review under Section 17 based on the following reasons:

1. Not in line with the planning intention of the “Agriculture” (AGR) zoning

The application sites are located within the ARG zone, where the planning intention is “to retain and safeguard good quality agricultural land/farm/fishponds 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 photograph and our on-site observation, there are active agricultural lands immediately next to the application sites and in the Tsiu Keng Pang Uk area (Figures 1 and 2). We consider that the application sites have a high potential for farmland rehabilitation.

However, the proposed small houses development would lead to a direct loss of arable agricultural lands in the Tsiu Keng area, which is not in line with the above planning intention. Moreover, the approval of this application would set an undesirable precedent for future developments within the AGR zone in the area. For the past 10 years or so, the approval rate of small houses applications in AGR zones is over 60%¹, thus agricultural land is vulnerable to small house development. We are concerned the further loss of arable agricultural lands would lead to adverse impacts on farmland birds. We, therefore, urge the Board to reject these planning applications and small houses development should be limited within the “Village

¹ 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



Type Development” zone.

2. The importance of the agricultural lands in Tsiu Keng

Many of the agricultural lands in the Tsiu Keng area are still actively farmed, and both dry and wet agriculture are found. In the Notes of the Kwu Tung South OZP, the Director of Agriculture, Fisheries and Conservation classified the agricultural land in Tsiu Keng as good, and recognizes the field condition and farm access in the area are good as well². As of 7 July 2015, there are 41 Local Accredited Farms in Tsiu Keng, covering an area of 176.1 dau chung (approximately 12 hectares) which is the second largest in Hong Kong³. In the Planning and Engineering Study for the North East New Territories New Development Area, a major cluster of AGR zoned land (about 34 ha) at Kwu Tung South are identified as potentially suitable for agricultural rehabilitation, which includes the Tsiu Keng area⁴. All of the above clearly indicates that the agricultural lands in Tsiu Keng, whether active or fallow, are of significant importance and should be well-protected.

3. The ecological value of agricultural land

The HKBWS has recorded approximately 293 species of birds in the agricultural lands of Hong Kong. This constitutes 55% of the total bird species in Hong Kong⁵, and 20% of the total bird species in China⁶. Among them, almost half of the species recorded (140 species) are regarded as of conservation importance. This indicates that the agricultural lands in Hong Kong supports a high diversity of birds, thus should be adequately protected and managed.

4. 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*”⁷. We note that all other Government bureaux/departments are also bound to the HKPSG, and the Agriculture, Fisheries and Conservation Department (AFCD) and the Planning Department (PlanD) have the

² Section 9.7.1 of the Explanatory Statement of the Approved Kwu Tung South OZP S/NE-KTS/14

³ http://www.afcd.gov.hk/english/agriculture/agr_accfarm/agr_accfarm_num/files/map_afs_7_7_2015.pdf

⁴ P.19 of the information digest for the Planning and Engineering Study for NENT NDA (July 2013)

⁵ The total number of bird species in Hong Kong is 531.

⁶ According to the CBR Checklist of Birds of China v3.0 (2013), the total number of bird species in China is 1434.

⁷ Hong Kong Town Planning Standards and Guidelines – Chapter 10 Conservation. Section 2.1 (ii).

responsibility to advise the TPB on the ecological⁸ and planning aspects respectively. Given AFCD's mission to conserve natural environment and safeguard the ecological integrity⁹, 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 these applications. 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 applications. Thank you for your kind attention.

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

⁸ AFCD Role of Department. Available at: http://www.afcd.gov.hk/english/aboutus/abt_role/abt_role.html

⁹ AFCD Vision and Mission. Available at:
http://www.afcd.gov.hk/english/aboutus/vision_mission/abt_vision_mission.html

Figure 1. Google Earth aerial photograph of the application sites and their surroundings with active farmlands (photograph taken on 14 April 2015) (the approximate location of the application sites is indicated by the red circle).

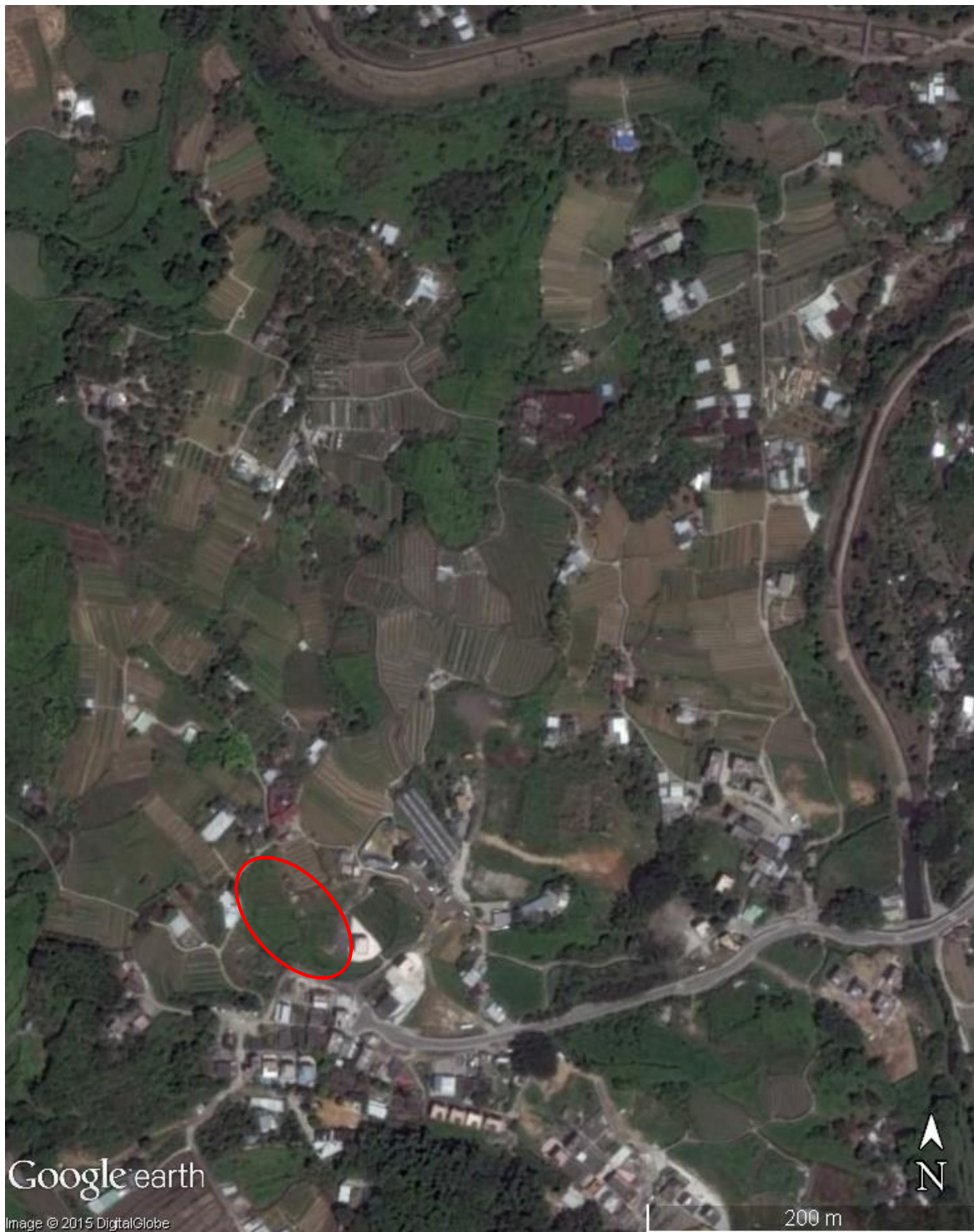


Figure 2. Active farmlands in Tsiu Keng Pang Uk. Photographs taken in February 2016.

