

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



By email only

19 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 Tin Liu Ha, Tai Po (A/NE-LT/569)

The Hong Kong Bird Watching Society (HKBWS) would like to maintain our objection to the planning application A/NE-LT/569 under Section 16 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, the application site is immediately next to a woodland and there are still active agricultural lands in the Tin Liu Ha area (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 Kong¹ and 20% of the total bird species in China². 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 construction and operation of the proposed small house development would have adverse ecological impact to the adjacent woodland and would lead to a direct loss of arable agricultural lands in the Tin Liu Ha 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

¹ The total number of bird species in Hong Kong is 531.

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



area. For the past 10 years or so, the approval rate of small houses applications in AGR zones is over 60%³, thus agricultural land is vulnerable to small house development. We are concerned the further encroachment into the woodland in the AGR zone and the further loss of arable agricultural lands would lead to adverse impact on both the woodland and 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*”⁴. 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 particular⁵. Given AFCD’s mission to conserve natural environment and safeguard the ecological integrity⁶ 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,

³ 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

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

⁵ AFCD Role of Department. Available at: http://www.afcd.gov.hk/english/aboutus/abt_role/abt_role.html

⁶ AFCD Vision and Mission. Available at: http://www.afcd.gov.hk/english/aboutus/vision_mission/abt_vision_mission.html



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

Figure 1. Google Earth aerial photograph showing the woodland near the application site and the active agricultural lands in the Tin Liu Ha area (photograph taken on 14 April 2015) (the approximate location of the application site is indicated by the red arrow).

