

Secretary, Town Planning Board  
15/F, North Point Government Offices  
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By email only

4 July 2016

香港觀鳥會  
THE  
HONG  
KONG  
BIRD  
WATCHING  
SOCIETY

Since 1957 成立

Dear Sir/Madam,

**Objection to the planning applications for Proposed Houses (New Territories Exempted Houses – Small Houses) at Ko Tong, Tai Po (A/DPA/NE-TT/93 & A/DPA/NE-TT/94)**

The Hong Kong Bird Watching Society (HKBWS) would like to raise an objection to the planning applications A/DPA/NE-TT/93 & A/DPA/NE-TT/94 under Section 16.

**1. Not in line with the intention of the “Unspecified Use” (UU) zoning**

In section 7.4.2(a) of the Explanatory Statement of the Approved Tai Tan, Uk Tau, Ko Tong and Ko Tong Ha Yeung Development Permission Area (DPA) Plan No. DPA/NE-TT/2<sup>1</sup>, it stated that “to protect the natural and landscape character of the Area, planning guidance and development control are considered necessary. Owing to the urgency to establish planning control under the DPA plan, the Area, except the land within the “V” (Village Type Development) zones, has been designated as “Unspecified Use” pending detailed analysis and studies to establish the appropriate land uses in the course of the preparation of OZP (Outline Zoning Plan)”. Approval of any development at this stage would obstruct the assessment of habitats within the Plan Area, and thus affecting the preparation of appropriate land use zonings for the upcoming OZP. This will also set an undesirable precedent to future similar cases in the DPA Plan, hence threatening the ecological integrity of the area. The Town Planning Board (the Board) **should not approve** any planning applications during this period in order to adequately protect the natural habitats in the locality and avoid predetermining the land use zonings when the draft OZP is under preparation.

**2. Ecological value and conservation importance of Ko Tong and its surroundings**

The application sites are dominated by Fung Shui woodland and secondary woodland<sup>2</sup>, and are ecologically connected to the Sai Kung West Country Park. These habitats provide suitable foraging and roosting grounds for various bird species.

<sup>1</sup> [http://www2.ozp.tpb.gov.hk/plan/ozp\\_plan\\_notes/en/DPA\\_NE-TT\\_2\\_e.pdf](http://www2.ozp.tpb.gov.hk/plan/ozp_plan_notes/en/DPA_NE-TT_2_e.pdf)

<sup>2</sup> Kadoorie Farm and Botanic Garden (2013). Ecological and Conservation Importance of Six Sai Kung Country Park Enclaves – 1st edition. October 2013.



From 2005 to 2014, HKBWS has recorded 107 species of birds in Tai Tan, Ko Tong and Uk Tau, which accounts for about one-fifth of the total number of bird species recorded in Hong Kong<sup>3</sup>; among them, 24 species are of conservation concern. Due to limited bird records received, the dataset may not be comprehensive to reflect the bird diversity in the whole Plan Area of Tai Tan, Ko Tong and Uk Tau. However, from the existing dataset, a wide range of woodland birds species were recorded, including the uncommon<sup>4</sup> Ashy Drongo (*Dicrurus leucophaeus*) and the rare<sup>4</sup> Eurasian Jay (*Garrulus glandarius*) which both are of local concern<sup>5</sup>. This indicates that the woodland habitat in the area is of high ecological value and is worthy of protection.

From Google Earth aerial photograph, the application sites are still densely vegetated (Figure 1). We are concerned the construction and operation of the proposed New Territories Exempted Houses (NTEHs) would lead to further fragmentation, degradation or even destruction of the ecologically sensitive woodland habitats and increase in noise and human disturbances, thus have significant negative impacts on wildlife and birds of conservation importance in the area.

### **3. Justifications for the decision and comments made by Government departments and the Town Planning Board**

According to the Hong Kong Planning Standards and Guidelines (HKPSG), Chapter 10, Section 2.1 (ii), the Board has the responsibility to, “*restrict uses within conservation zones to those which sustain particular landscapes, ecological and geological attributes and heritage features*”. 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 responsibility to advise the TPB on the ecological<sup>6</sup> and planning aspects in particular. Given AFCD’s mission to conserve natural environment and safeguard the ecological integrity<sup>7</sup>, and the proposed NTEHs are not in line with the planning intention of the statutory plan, HKBWS would also expect AFCD and PlanD to object to these applications. Should AFCD, PlanD or the Board feels otherwise, we urge that the appropriate justifications are provided.

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<sup>3</sup> Total bird species in Hong Kong is 531.

<sup>4</sup> HKBWS Hong Kong Bird Report 2013.

<sup>5</sup> 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.

<sup>6</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>7</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)

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

Thank you for your kind attention and consideration.

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

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**Figure 1.** Google Earth aerial photographs showing the densely vegetated condition at and around the applications sites in Ko Tong (the approximate location of the application sites is indicated by the yellow circle). Photograph taken on 14 April 2015.

