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The Conservancy Association

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17<sup>th</sup> March 2015

Town Planning Board  
15/F North Point Government Offices  
333 Java Road  
North Point  
Hong Kong

By e-mail: [tpbpd@pland.gov.hk](mailto:tpbpd@pland.gov.hk)

Dear Sir/Madam

Re: Comments on the Section 12A Application No. Y/NE-KTS/7

The Conservancy Association (CA) OBJECTS to the captioned Section 12A Application.

### **1. Adverse impact on agriculture**

This development proposal is located within the “Agriculture” (AGR) zone. It would cause direct loss of agricultural land, both active and disused (Figure 1 and 2), in Tsiu Keng. From our calculation, at least 26% of active agricultural land would be loss, including 5 Accredited Farms within the development site. Some irrigation ditches can also be spotted along the road but definitely it will be covered and replaced by cement due to the proposed road widening work along part of Tsiu Keng Road. Such impact on agriculture would not be confined within site boundary but the entire agricultural area. However, all primary and secondary and cumulative impacts on agricultural development in the subject site have not been addressed and ignored.

The planning intention of AGR zone is to safeguard and retain good quality agriculture land. CA opines that it should be strongly upheld in Tsiu Keng.

## **2. Contradictory with rehabilitation program under North-east New Territories New Development Areas (NENT NDA)**

The importance of Kwu Tung South in agriculture is further highlighted with reference to the revised proposal of NENT NDA. Kwu Tung South is identified as areas suitable for agricultural rehabilitation (Figure 3) so that the affected farmers could re-establish their farming practices. The captioned planning application would encroach part of the land suitable for farming and greatly deviate guiding principle of NENT NDA study.

## **3. No ecological assessment**

The project proponent has not conducted ecological assessment to demonstrate the ecological baseline on the subject site and evaluate potential impacts on ecological environment. Research<sup>1</sup> has indicated that agricultural land, both active and disused, would provide an important habitat for bird community so that both of them need further attention.

Yours faithfully



Ng Hei Man  
Assistant Campaign Manager

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<sup>1</sup> Leven M.R. (1998). Special Feature – Focus on Farmlands, Porcupine!. No18, Newsletter of Ecological & Biodiversity: The School of Biological Sciences. The University of Hong Kong.

**Figure 1 and 2            Agricultural land, both active and disused, would be affected by the proposed development**



**Figure 3** Kwu Tung South is identified as areas suitable for agricultural rehabilitation (Extracted from Information Digest of Revised Development Proposals of NENT NDA. Please refer to: [http://www.nentnda.gov.hk/doc/pe/info\\_digest.pdf](http://www.nentnda.gov.hk/doc/pe/info_digest.pdf)). The proposed development (marked in purple) would lie within the identified farm rehabilitation area.

