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The Conservancy Association

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2nd February 2011

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

By Fax: 28770245/25228426

Dear Sir/Madam

Re: Comments on the Section 12A Application No. Y/NE-PK/1

The Conservancy Association (CA) would OBJECT to Section 12A Application Y/NE-PK/1.

The supplementary information still lacks a comprehensive ecological study on the study area. Whether the associated site formation works would seriously alter entire ecology and hydrology in the area remains uncertain. Research¹ has indicated that agricultural land, both active and disused, would provide an important habitat for bird community so that protecting agricultural land should be on priority. It would be further justified by the presence of the Malayan Night Heron which had been recorded breeding at Ping Kong and feeding around the AFCD Tai Lung experimental farm in adjacent². Simply accepting the perception of agricultural land as low ecological value with high human disturbance would not only threaten bird but also other species dependent on farmland habitat. Further ecological assessment is definitely needed to fill current information gap of existing ecological baseline.

¹ Leven M.R. (1998). Special Feature – Focus on Farmlands, *Porcupine!*. No. 18, Newsletter of Ecology & Biodiversity: The School of Biological Sciences. The University of Hong Kong.

² Allcock J.A. (2009). Farmland Birds. *Ecology of the birds in Hong Kong*. Hong Kong: Kadoorie Farm & Botanic Garden.

Despite provision of a tree survey, it cannot evade from the fact that considerable amount of trees would be felled. As mentioned above that the applicant fails to evaluate ecological impact of the plan, it would be doubtful if the ecological concern has been considered during preparing the tree survey, not to say the proposed compensation plan on tree loss. The suggestion to transplant exotic *Melaleuca quinquenervia* might even strengthen such query. It should be added that some trees act as green buffer and should not be disturbed by any development.

It would be misleading for the applicant to keep on quoting The Planning and Development Study on North East New Territories (NENT) in 2003 as a justification of the plan when responding to comments from the Chief Town Planner/Urban Design and Landscape. CA should reiterated that The new NENT New Development Area (NDA) Study has been conducting since 2008 due to changing planning circumstance and public aspirations which were clearly mentioned in the Stage 1 Public Engagement Digest. Identifying Ping Kong as a feasible Type B NDA to accommodate new development is thus not applicable in current scenario.

CA should again reiterate that the proposed plan on this site would totally deviate the general planning intention of Ping Kong. Response from AFCD in the supplementary information has indicated the importance of preserving good quality agricultural land. While active agricultural practice can still be spotted in the proposed development area, Ping Kong consists of a mix of rural landscape including orchards, village land, scattered woodland and shrub land. Whether applicant's claim on rezoning the site matches the current planning situation of seems invalid.

Yours faithfully
Ng Hei Man
Campaign Officer