



長春社 Since 1968

The Conservancy Association

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18th April 2023

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

By e-mail: tpbpd@pland.gov.hk

Dear Sir/Madam,

Comments on the Section 12A Application No. Y/NE-TKL/4

The Conservancy Association (CA) OBJECTS to the captioned application.

1. Not in line with the planning intention

According to the Approved Ping Che and Ta Kwu Ling Outline Zoning Plan (S/NE-TKL/14), the general planning intention for the Area is “*to promote the conservation of the rural character so as to control urban sprawl, reduce flood risk and preserve agricultural land...*” However, the application is indeed a huge development project at the expense of the rural character and agricultural land. The massive scale of the development together with transport improvement work would significantly alter the tranquil rural character, possibly resulting in a general degradation of the environment and landscape quality of the area.

2. Adverse impact on agriculture

Most of the agricultural land within the application site is within AGR zone. Both active and fallow land can be spotted. They are non-fragmented and remain large in scale. Not only do we worry the direct loss of agricultural land due to the proposed rezoning application, but also great changes/disruption to existing hydrological condition of agricultural land and irrigation system.



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Under such circumstance, however, we cannot see any attempts of the applicant to propose any alternative land use configuration/design or other measures to avoid and minimize impacts on, for example, fragmentation of agricultural land, temporary and permanent loss of agricultural land, increase in non-agricultural uses, water quality, etc., during construction and operation phase.

3. Adverse ecological impacts

Past researches^{1 2} have indicated that agricultural land, both active and disused, would provide an important habitat for bird community so that both of them need further attention. A recent comprehensive bird atlas conducted by the Hong Kong Bird Watching Society revealed that over 77% of bird species with a shrunken distribution were open country species. These bird species favour in inhabiting in open country areas, including agricultural land. These bird species favour in inhabiting in open country areas, including agricultural land³. Apart from birds, other wildlife groups including butterflies, odonates, amphibians, etc., would also inhabit in agricultural land. However, currently no ecological impact assessment is provided in this rezoning application. It is unclear how direct and indirect ecological impacts have been identified, evaluated, avoided and mitigated in proper.

4. Undesirable precedent for similar case

Over the past decade, there was already cumulative loss of agricultural land in Hong Kong. Area of agricultural land has already decreased from 6,080 hectares in 1997⁴ to 4,100 hectares in 2023⁵. In such case, the proposed rezoning application would merely constitute greater pressure in agricultural land, and set undesirable precedent

¹ 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.

² Allcock, J.A. (2009) Farmland Birds. In: C. L. C. Wong, V. W. Y. Lam, and G. W. J. Ades (Eds), Ecology of the Birds of Hong Kong. Kadoorie Farm & Botanic Garden, Hong Kong, pp. 87-104.

³ The Hong Kong Bird Watching Society (2020). The only Hong Kong Bird Atlas showed birds from open country accounted for 70% of species with shrunken distribution. Calls for Immediate Actions for Conserving Open Country.

<https://cms.hkbws.org.hk/cms/en/hkbws/work/resarch/hk-bird-atlas-2020-en>

⁴ LCQ20: Local agricultural development

<https://www.info.gov.hk/gia/general/201302/06/P201302060519.htm>

⁵ Reply Serial No. EEB(F)017. Replies to initial questions raised by Legislative Council Members in examining the Estimates of Expenditure 2023-24. Director of Bureau : Secretary for Environment and Ecology. https://www.legco.gov.hk/yr2023/english/fc/fc/w_q/eeb-f-e.pdf



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for similar applications for large-scale development in the area.

Yours faithfully,

Ng Hei Man

Campaign Manager

The Conservancy Association