



55th週年紀念
Anniversary
1957-2012

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

22 June 2012

Dear Sir/Madam,

香港觀鳥會
THE
HONG
KONG
BIRD
WATCHING
SOCIETY

國際鳥盟準成員
BirdLife Partner Designate

Objection on Application for Amendment of Plan in Ping Kong (Y/NE-PK/2)

The Hong Kong Bird Watching Society (HKBWS) would like to raise our objection on the Application for Amendment of Plan To rezone Various Lots in D.D. 91 and Adjoining Government Land Ping Kong, Sheung Shui, New Territories from "Agriculture" to "Comprehensive Development Area" (Y/NE-PK/2) based on the following reasons:

1. Lack of Justification for proposed rezoning

- 1.1. The planning intention of the "Agriculture" Zoning is to protect good quality land for agricultural use¹. Currently both active and abandoned farmland is found in the area, indicating that there is great potential for agricultural activities. According to a local research², agricultural lands often have a high ecological value and support a unique community of birds. Agricultural lands in Hong Kong are currently under great pressure from various developments, thus there is a need to preserve them for conservation of rural cultures and biodiversity. The site is one of the few remaining pieces of large adjoining agricultural land in Hong Kong. The current zoning is appropriate for nature conservation and protecting the rural environment from urban encroachment.
- 1.2. The proposed rezoning is not in line with the general planning intention of the Ping Kong Outline zoning plan which indicates that "*intensive development should not be encouraged*"³. The proposed rezoning and associated development would destroy "*the largely unspoilt rural character*"³.

¹ TPB, 2008, Master Schedule of Notes – Agriculture, available at http://www.info.gov.hk/tpb/en/forms/Schedule_Notes/msn_gb_e.pdf

² 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.

³ Section 8 of the explanatory statement of the Ping Kong Outline zoning Plan S/NE-PK/11

2. Inadequacies of the Ecological Assessment

- 2.1. The area is the only confirmed breeding ground of Malayan Night Heron (*Gorsachius melanolophus*), a rare species with scarce records in Hong Kong⁴. The proponent, however, failed to record the species and failed to locate its breeding habitats.
- 2.2. Many species of conservation interest are also recorded in the area according to the Study Brief⁵ issued by the EPD on 6 July 2011. The proponent failed to record most species outlined in the study brief and these species have not been included in the impact assessment.
- 2.3. Some species of conservation interest recorded by the proponent have not been included for impact assessment, for example, Collared Crow (*Corvus torquatus*) which is listed as “Near threatened” in the IUCN red list.
- 2.4. On the other hand, according to the ecological assessment provided by the applicant, highest bird diversity are found in abandoned agriculture land among other habitats in the study area⁶.
- 2.5. Based on the above, the proponent failed to justify their claim that “ecologically sensitive areas are now excluded”⁷.
- 2.6. The ecological assessment therefore could not adequately address the ecological impact of the proposed development.

Based on the above reasons, the HKBWS respectfully request the Town Planning Board to reject the captioned application. Thank you for your attention.

Yours faithfully,

Cheng Nok Ming
Conservation Officer
Hong Kong Bird Watching Society

⁴ The Record can be viewed on the archive of HKBWS forum:
<http://www.hkbws.org.hk/cgi-bin/YaBB.pl?board=PhotoGallery;action=display;num=1094452205>

⁵ <http://www.epd.gov.hk/eia/register/study/latest/esb-230.pdf>

⁶ Appendix 2 of the ecological assessment provided by the applicant

⁷ Executive Summary of the captioned rezoning application