



長春社 Since 1968

The Conservancy Association

會址：香港九龍青山道 476 號 1 樓 102 室

Add.: Unit 102, 1/F, PeakCastle, 476 Castle Peak Road, Kowloon, Hong Kong.

電話 Tel.: (852) 2728 6781 傳真 Fax: (852) 2728 5538

電子郵箱 E-mail: cahk@cahk.org.hk 網址 Website: www.cahk.org.hk

6th October 2017

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

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 abandoned (Figure 1 and 2), in Tsiu Keng, 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 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.

The importance of Kwu Tung South in agriculture is further highlighted with reference to the recent proposal of Agri-Park. Even though the project proponent argues that the

development falls outside the 1st phase of Agri-Park, it is indeed still within the site boundary of Agri-Park (Figure 3). The development proposal would encroach land suitable for farming and farm rehabilitation.

2. Adverse ecological impact

Research¹ 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. From the ecological impact assessment, half of avifauna records are within agricultural land. Species of conservation concern, such as Red-throated Pipit (*Anthus cervinus*), Red-billed Starling (*Spodiopsar sericeus*) can also be spotted in agricultural land. We are in grave concern that the development would cause adverse ecological impact in the subject site.

We also note that the buffer for the stream is only 10m while the houses and retention pools lie very close to the buffer. Since limited details can be obtained from the assessment, it is doubtful if the buffer can be effective in protecting the stream.

Yours faithfully
Ng Hei Man
Campaign Manager

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.

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

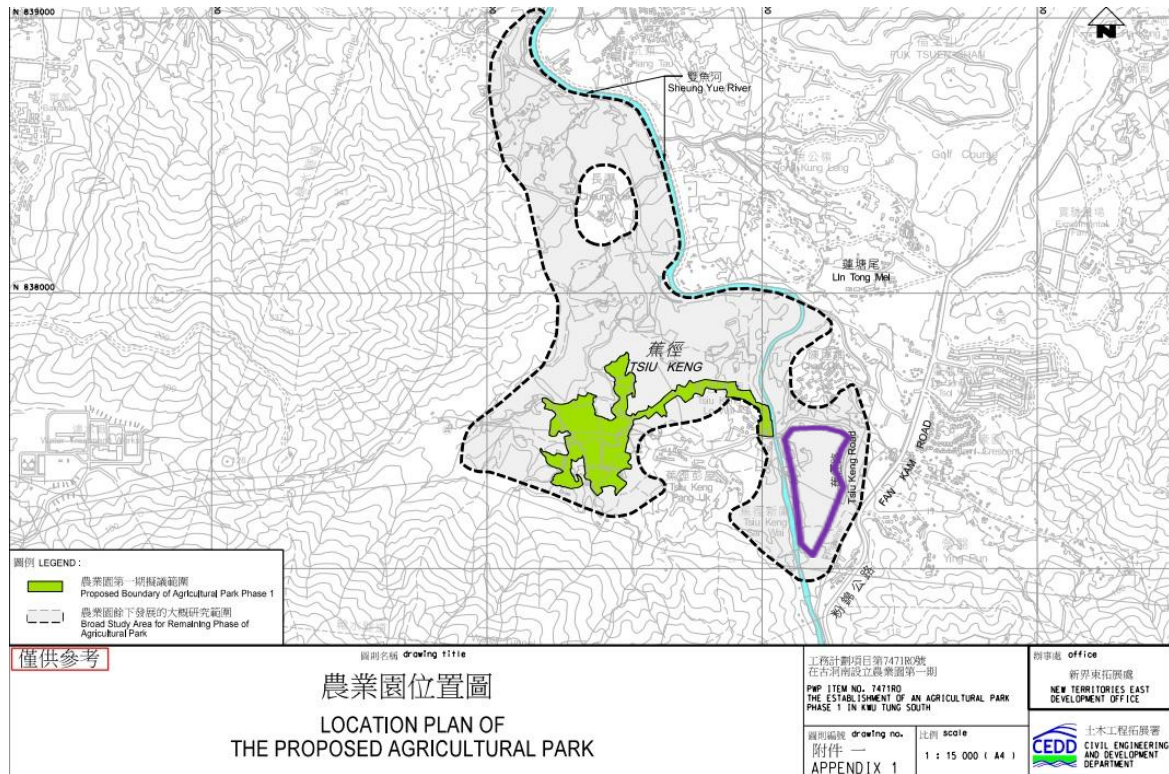


Registered Name 註冊名稱 : The Conservancy Association 長春社 (Incorporated in Hong Kong with limited liability by guarantee 於香港註冊成立的擔保有限公司)

Figure 3 The proposed development (marked in purple) lies within site boundary of Agri-Park

(Source:

http://www.districtcouncils.gov.hk/north/doc/2016_2019/tc/dc_meetings_doc/11910/n_2017_034_ch.pdf)



Registered Name 註冊名稱 : The Conservancy Association 長春社 (Incorporated in Hong Kong with limited liability by guarantee 於香港註冊成立的擔保有限公司)