

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

By email only

24 November 2020

Dear Sir/Madam,

**Comments on the planning application for the proposed Temporary Open Storage  
of Construction Materials and Ancillary Warehouse and Offices for a Period of 3  
Years at Ta Kwu Ling North (A/NE-WKS/15) (Review under Section 17)**

The Hong Kong Bird Watching Society (HKBWS) objects to the planning application based on the following reasons.

**1 Not in line with the planning intention of the “Agriculture” (AGR) zoning**

Most of the application site is located within the AGR zone, where the planning intention is “to retain and safeguard good quality agricultural land/farm/fish ponds for agricultural purposes. It is also intended to retain fallow arable land with good potential for rehabilitation for cultivation and other agricultural purposes”. The Google Earth aerial photograph in 2019 reveals that the site is vegetated and there are active farmlands nearby (Figure 1). We consider the site has potential for farmland rehabilitation. However, the proposed open storage would lead to a loss in arable land, and is not in line with the intention to retain land for agricultural purposes. Therefore, we urge the Town Planning Board (Board) to reject this application.

**2 The Town Planning Board should not encourage “destroy first, build later”**

From Google Earth aerial photograph and the site photo provided by the Conservancy Association, landscape changes including vegetation clearance and site formation were seen at the application site between 2019 and 2020 (Figure

1). We suspect that this is “destroy first, build later”. We are concerned the approval of the current application would further legitimize the current misuse of the AGR zone, leading to the promotion of “destroy first, develop later” attitudes among landowners in the locality. As the Board has suggested that “*the Board will not tolerate any deliberate action to destroy the rural and natural environment in the hope that the Board would give sympathetic consideration to subsequent development on the site concerned.*”<sup>1</sup> We urge the Board to reject this application.

### **3 Set an undesirable precedent to the future development**

As there are active agricultural land nearby, the approval of this application will set an undesirable precedent to the future similar applications within the AGR zone, and thus nullifying the statutory planning control mechanism. We urge the Board to reject this application in order to protect AGR zone and the existing agricultural cluster from any development threats.

### **4 Justifications for the decision and comments made by Government departments and the Board**

According to the Hong Kong Planning Standards and Guidelines (HKPSG), Chapter 10, Section 2.1 (ii), the Board has the responsibility to, “*restrict uses within conservation zones to those which sustain particular landscapes, ecological and geological attributes and heritage features*”. We note that all other Government bureaux/departments are also bound to the HKPSG, and the Agriculture, Fisheries and Conservation Department (AFCD) and the Planning Department (PlanD) have the responsibility to advise the Board on the ecological<sup>2</sup> and planning aspects in particular. Given AFCD’s mission to conserve natural environment and safeguard the ecological integrity<sup>3</sup>, and the proposed development is not in line with the planning intention of the statutory zoning, HKBWS would also expect AFCD and

---

<sup>1</sup> TPB Press Release. Available at:  
<http://www.info.gov.hk/gia/general/201107/04/P201107040255.htm>

<sup>2</sup> AFCD Role of Department. Available at:  
[http://www.afcd.gov.hk/english/aboutus/abt\\_role/abt\\_role.html](http://www.afcd.gov.hk/english/aboutus/abt_role/abt_role.html)

<sup>3</sup> AFCD Vision and Mission. Available at:  
[http://www.afcd.gov.hk/english/aboutus/vision\\_mission/abt\\_vision\\_mission.html](http://www.afcd.gov.hk/english/aboutus/vision_mission/abt_vision_mission.html)

PlanD to object to this application. Should AFCD, PlanD or the Board feels otherwise, we urge that the appropriate justifications are provided.

The HKBWS respectfully requests the Board to take our comments into consideration and reject the current application. Thank you for your kind attention.

Yours faithfully,



Wong Suet Mei  
Conservation Officer  
The Hong Kong Bird Watching Society

cc.

The Conservancy Association  
Designing Hong Kong  
Kadoorie Farm and Botanic Garden  
WWF – Hong Kong  
TrailWatch

**Figure 1.** The Google Earth aerial photograph in 2019 reveals that the site (marked with red line) is vegetated and there are active farmlands nearby. We consider the site has potential for farmland rehabilitation. However, the proposed open storage would lead to a loss in arable land. Besides, the site photo in November 2020 taken by the Conservancy Association shows that landscape changes including vegetation clearance and site formation were seen at the site. We suspect that this is “destroy first, build later”.

