



長春社 Since 1968

The Conservancy Association

會址: 香港新界葵涌貨櫃碼頭路 77-81 號 Magnet Place 一期十三樓 1305-6 室 電話 Tel.:(852)2728 6781 傳真 Fax.:(852)2728 5538
Add.: Units 1305-6, 13/F, Tower 1, Magnet Place, 77-81 Container Port Road, 電子郵件 E-mail:cahk@cahk.org.hk
Kwai Chung, New Territories, H.K.
網址 Website:www.cahk.org.hk

6th October 2022

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 16 Application No. A/YL-KTN/859

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

1. Not in line with the planning intention of Agriculture (AGR) zone

According to the approved Kam Tin North Outline Zoning Plan (OZP) No. S/YL-KTN/9, the planning intention of agriculture zone “*is intended primarily 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*”. From the application, however, we cannot see any details to justify that the plan would fulfill the above planning intention, especially the need to propose 24% of paved area. We do not think such plan is in line with the planning intention.

2. Adverse environmental impacts

4 planning applications, namely A/YL-KTN/520, A/YL-KTN/665, A/YL-KTN/772, and A/YL-KTN/817 have been approved with conditions at the proposed site. Comparing the existing application with the previous applications (see the table below), its development scale is larger, with larger site, more structures, parking spaces, higher maximum building height. We especially worry that the current paved area ratio is much higher than the previous applications. Paving too excessive materials such as concrete, brick, gravel on the existing farmland is largely incompatible with the subject site and its surrounding area.



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Major Development Parameters	A/YL-KTN/520	A/YL-KTN/665	A/YL-KTN/772	A/YL-KTN/817	A/YL-KTN/859
Site Area	3,885 m ² (about)	3,885 m ² (about)	5,525 m ² (about)	6,002 m ² (about)	7,056 m² (about)
Covered Area Ratio	12% (about)	12% (about)	12% (about)	15% (about)	18% (about)
Paved Area Ratio	11% (about)	11% (about)	10% (about)	22% (about)	24% (about)
Building Height	2.5m-3.8m	2.5m-3.8m	2.8m-4m	2.8m-4m	2.8m-4m
No. of structures	14 (reception and agriculture teaching Center, storage of agricultural tools and seeds, portable toilet, caravan camp)	14 (reception and agriculture teaching center, storage of agricultural tools and seeds, portable toilet, caravan camp)	23 (ancillary canteen, canteen kitchen, washroom, caretaker office, refreshment kiosk, agricultural education room, rain shelter (canopy) and caravan camp site)	32 (ancillary canteen, canteen kitchen, activity room, washroom, outdoor seating accommodation, guardroom, meter room, refreshment kiosk, rain shelter (canopy) and store room uses, and 15 caravans)	40 (23 structures for ancillary eating place, kitchen of eating place, activity room, washroom, outdoor seating shelter, guardroom, meter room, refreshment kiosk, rain shelter, site office and store room uses, and 17 caravans)
No. of Parking Spaces	15	16	17	20	20

Details above are extracted from Gist of A/YL-KTN/520, A/YL-KTN/665, A/YL-KTN/772, A/YL-KTN/817, A/YL-KTN/859

3. Undesirable precedent for similar applications

According to Statutory Planning Portal, we note that since 2015, 4 planning applications (Nos. A/YL-KTN/474, 520, 665, 772 and 817) have been submitted for temporary hobby farm or caravan holiday camp at the same site. However, none of them have been implemented until now.

- Application No. A/YL-KTN/474 was revoked in August 2018
- Application No. A/YL-KTN/520, after applying extension of time limit 8 times, was lapsed on May 2019
- Application No. A/YL-KTN/665, with the planning permission valid until 5 July 2022, has already been approved for extension of time limit 8 times. At this



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moment, merely the approval condition on submission of fire service installations proposal has been complied with¹

- Class B Amendment – extension of time limit was approved for Application No. A/YL-KTN/772 and No. A/YL-KTN/817

With the above observation, we doubt that the project proponent is not able to fulfil the conditions mentioned by Town Planning Board (TPB), and demonstrates large departure from the proposed use on a temporary basis. We do not think further sympathetic consideration should be given or it would set undesirable precedent for similar applications in future.

Yours faithfully,
Chow Oi Chuen
Campaign Officer
The Conservancy Association

¹ Please refer to Section 5 Previous applications, RNTPC Paper No. A/YL-KTN/772
https://plandcss2-my.sharepoint.com/personal/tpbsubmission_pland_gov_hk/_layouts/15/onedrive.aspx?id=%2Fpersonal%2Ftpbsubmission%5Fpland%5Fgov%5Fhk%2FDocuments%2FMeeting%20Folder%2FRNTPC%2FRNTPC%2D20210709%2FFSYLE%2FA%5FYL%2DKTN%5F772%2FA%5FYL%5FKTN%5F772%5FMainpaper%2Epdf&parent=%2Fpersonal%2Ftpbsubmission%5Fpland%5Fgov%5Fhk%2FDocuments%2FMeeting%20Folder%2FRNTPC%2FRNTPC%2D20210709%2FFSYLE%2FA%5FYL%2DKTN%5F772