



長春社 Since 1968

**The Conservancy Association**

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8<sup>th</sup> February 2019

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/YL-KTS/5**

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

**1. Not in line with the planning intention**

According to the Approved Kam Tin South Outline Zoning Plan (No. Y/YL-KTS/5), the general planning intention for the Area is “*to facilitate appropriate scale of development near the West Rail Kam Sheung Road Station...Also, good quality agricultural land especially those under active cultivation will be retained as appropriate”.* From aerial photos, although the application site is fallow, it is adjacent to active farmlands (Figure 1). This shows that the site has good potential for rehabilitation and helps maintain a natural landscape of the Area. According to the Approved OZP, the planning intention of “Agriculture” (AGR) 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”.* Therefore, the application for rezoning the site from “Agriculture” (AGR) to “Residential (Group C)” is against the planning intention.

**2. Ecological concerns**

The EcoIA submitted by the applicant fails to provide adequate and comprehensive information on the ecological value of the application. The survey period was limited to mainly wet season (August, September and October). Only 1 out of 5 surveys was conducted in dry season (November). Therefore, the results of the



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survey may not be representative to reflect the ecology of the area. Also, around 2.37 ha of the study area was categorized as “vacant/grassland”. This categorization might not be accurate enough to reflect the actual conditions of the application site. The ecological value of the area may have been undervalued.

### 3. Undesirable precedent

Approving the captioned application would set an undesirable precedent for similar applications on rezoning AGR in the area. Development would further encroach into lands with agriculture and landscape values, decreasing overall quality of the environment of the district.

Yours faithfully,  
Charlotte Chan  
Campaign Officer  
The Conservancy Association



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**Figure 1. Aerial photo of the application site and adjacent active farmlands (circled in red) (Source: Google Earth)**

