



長春社 Since 1968

## The Conservancy Association

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2<sup>nd</sup> December 2021

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/NE-MTL/4

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

### **1. Not in line with the planning intention of Green Belt Area (GB) zone**

According to the approved Ma Tso Lung and Hoo Hok Wai Outline Zoning Plan (OZP) No. S/NE-MTL/3, the planning intention of GB zone *“is primarily for defining the limits of urban and sub-urban development areas by natural features and to contain urban sprawl as well as to provide passive recreational outlets. There is a general presumption against development within this zone.”*

From the application, however, we cannot see any details to justify that the plan would fulfill the above planning intention. We do not think such plan is in line with the planning intention.

### **2. Adverse environmental impact**

We worry that there would be several potential adverse environmental impacts caused by the application:

- Lacking details on the proposed pet park: According to the application, half of the site would be occupied by the pet park. However, we cannot see any plans or details to deal with associated potential environmental nuisance generated by the pet park during construction and operation phase





- Sewerage impacts: According to the application, we cannot see any details of the proposed toilets (both portable toilets and a toilet in a container), such as design; collection, treatment and disposal of sewage, and so on. We especially worry that leaking of human sewage can cause serious environmental and hygiene problems
- Lacking details of drainage design: a recent application A/NE-MTL/2, which is less than 50m from this application site, was rejected by the Rural & NT Planning Committee (RTNPC) on 8/1/2021. The RTNPC 663<sup>rd</sup> meeting pointed out that “*the applicant (A/NE-MTL/2) fails to demonstrate that the filling of pond and land would not cause adverse drainage and environmental impacts on the surrounding area*”. Referring back to the current application, similarly we cannot see how the project proponent can demonstrate that the plan, especially with pets park and campsite, will not cause adverse drainage and environmental impact too
- Light and noise pollution: As the application mentioned that the proposed site will be opened 24 hours from Mondays and Sundays, light and noise pollution generated from various activities would be highly inevitable. However, no attempts have been proposed to tackle such disturbance

### 3. Adverse ecological impact at Ho Sheung Heung Egretty and Conservation Area

The application is very close to the Ho Sheung Heung Egretty currently zoned Conservation Area. According to Egretty Counts in Hong Kong (2016-2020), it showed that Ho Sheung Heung Egretty was once a major habitats for Eastern Cattle Egret (*Bulbulcus coromandus*) and Chinese Pond Heron (*Ardeola bacchus*) also found in surrounding area. However, we worry that the application involved filling of pond and land, and this may affect their foraging habitat.

Also, the site falls within/very close to part of the flight-lines between the egretty and foraging locations of ardeids. As North East New Territories New Development Areas EIA Report (EIA-213/2013) showed that 28.5% flight-lines (Figure 1) will be crossed with the application site. During both construction and operation phase of the project, associated human disturbance such as light and noise pollution would be generated and may threaten the flight path of those birds, especially Eastern Cattle Egret and Chinese Pond Heron. With such an important ecological sites nearby, however, the project proponent failed to take this into account.





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#### 4. Undesirable precedent of “destroy first, build later”

This site has been subject to land formation and vegetation clearance (Figure 2-4). It is suspected that this is a case of “destroy first, build later”.

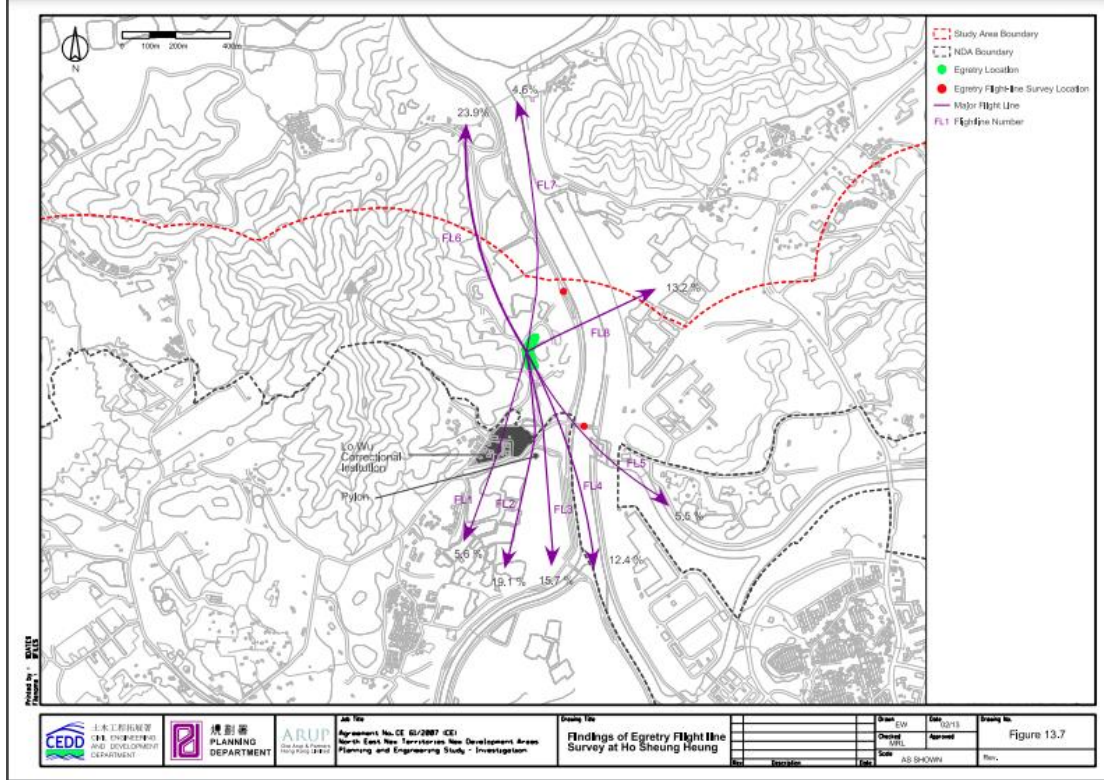
Planning Department and members of Town Planning Board (TPB) should alert that TPB has announced approaches to deter “destroy first, build later” activities in 2011. It stated that “the Board is determined to conserve the rural and natural environment and will not tolerate any deliberate action to destroy 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>. Therefore, this application should not be given any sympathetic consideration or it will set an undesirable precedent for similar cases in future.

Yours faithfully,  
Chow Oi Chuen  
Campaign Officer  
The Conservancy Association

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



**Figure 1 Findings of Egretty Flight-line Survey at Ho Sheung Heung**



**Figure 2-4** According to aerial photos (Source: Google Earth) and our observation in May 2021, this site (marked in red) has been subject to land formation and vegetation clearance (marked in blue). It is suspected that this is a case of “destroy first, build later”







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