



長春社 Since 1968

The Conservancy Association

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8th March 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 Applications No. Y/NE-STK/1

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

1. Not in line with the planning intention of the area

According to the Sha Tau Kok Outline Zoning Plan No. S/NE-STK/2, the general planning intention for the Area is “*to promote cultural conservation and recreation tourism. The rural character, natural habitats including the undisturbed woodland and lowland river habitats, the unique landscape as well as the ecologically important areas and the upland scene of the Planning Scheme Area should be conserved*”. CA does not agree that the proposed columbarium can achieve such planning intention but further deteriorate rural character of Sha Tau Kok.

2. Attempt of “destroy first, build later”

The subject site has been subjected to massive and unauthorized land filling activities. Enforcement actions have been taken by Planning Department. According to our site visit in February 2019, land excavation work could still be observed in various parts of the site (Figure 1). For example, the proposed road has already been built in the site before submission of this planning application (Figure 2).

We opine that this is a typical example of “destroy first, build later”. Approving this application would not be in line with what Town Planning Board (TPB) stated in a



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press release in 2011 concerning “destroy first, build later”¹. It was highlighted 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*”. TPB should not set an undesirable precedent for similar case.

3. Potential traffic impact

We are highly doubtful if the proposed traffic arrangement can cater excessive amount of visitors during festival days. Despite provision of shuttle bus service, its effectiveness in reducing traffic congestion would be greatly offset by additional parking space for private car and lay-by for taxi. Besides, we note that the proposed location Car Park A is now indeed the parking space for the adjacent hobby farm (Figure 3). The project proponent, however, does not consider how such arrangement would create additional traffic and parking problem in the subject site. We especially worry that additional agricultural land or green belt in adjacent would be excavated to “compensate” loss of parking space for this hobby farm. This would further deteriorate rural environment in Sha Tau Kok.

Yours faithfully,
Ng Hei Man
Campaign Manager
The Conservancy Association

¹ Town Planning Board adopts approaches to deter “destroy first, build later” activities, 4/7/2011
<http://www.info.gov.hk/gia/general/201107/04/P201107040255.htm>

Figure 1 Land excavation work could still be observed in the site



Figure 2 The proposed road has already been built in the site before submission of this planning application



Figure 3 The proposed location Car Park A is now indeed the parking space for the adjacent hobby farm

