



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

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9th February 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,

RE: Comments on the Section 16 Application No. A/NE-MKT/16

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

1. Limited area for cultivation

The percentage of site coverage is still too high. The existing site coverage (21.69%) implies that the site is mainly covered by structures and car parking space. Worse still, grass would be covered surrounding the fringe of the site. In this way, remaining area for cultivation is very limited (Figure 1). We cannot see how such arrangement would be justified from agricultural point of view.

2. Adverse landscape impact

From the aerial photo, dense vegetation cover could be spotted at the site, with more trees surrounding the site (Figure 2). While the planning application does not mention clearly the exact numbers and species affected, we worry that the project would cause further degradation of the landscape quality of the surrounding environment in the “GB” zone.

Besides, a pond can be spotted at the southwest of the site (Figure 3). The proposed outside activity shelter is located exactly at the pond area. While pond filling is not required according to the project proponent, we do not understand how it could be done.



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We still worry that, from the landscape perspective, no measures have been proposed by the project proponent to avoid or mitigate this potential landscape impact.

3. Undesirable precedent of “destroy first, build later”

The site was subject to land formation and vegetation clearance (Figure 4-6) and was involved in an unauthorized land filling development (Case No. E/NE-MKT/024). Enforcement Notice and Reinstatement Notice have been issued by Planning Department in December 2019. 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”¹. Therefore, this application should not be given any sympathetic consideration or it will set an undesirable precedent for similar cases in future.

Yours faithfully,
Ng Hei Man
Campaign Manager
The Conservancy Association

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



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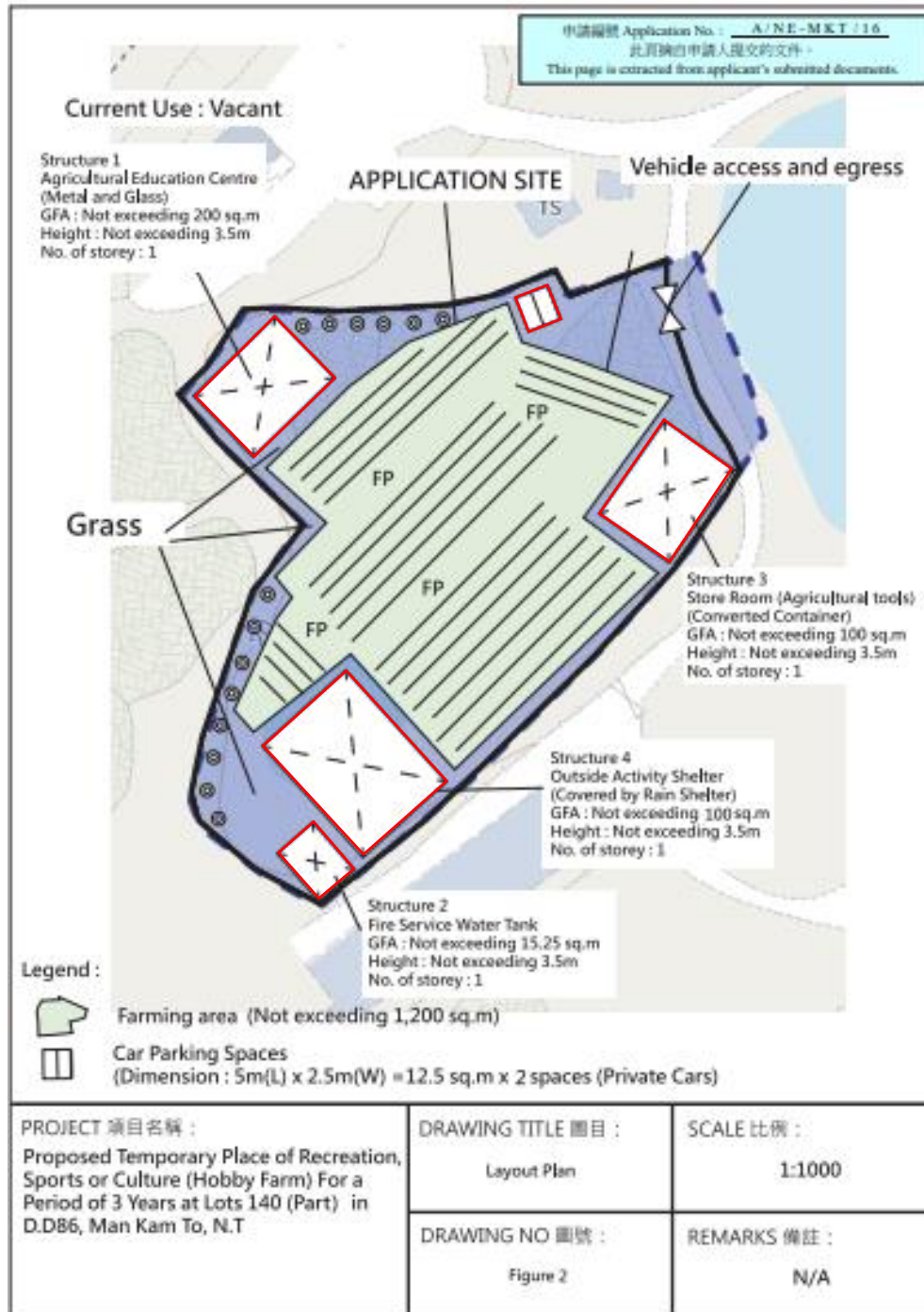
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Figure 1 The site would be covered by structures, car parking spaces (marked in red) and grass (shaded in blue). As a result, remaining area for cultivation would be very limited





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Figure 2 From the aerial photo, the subject site (marked in red) was covered by dense vegetation (Source: Google Earth)

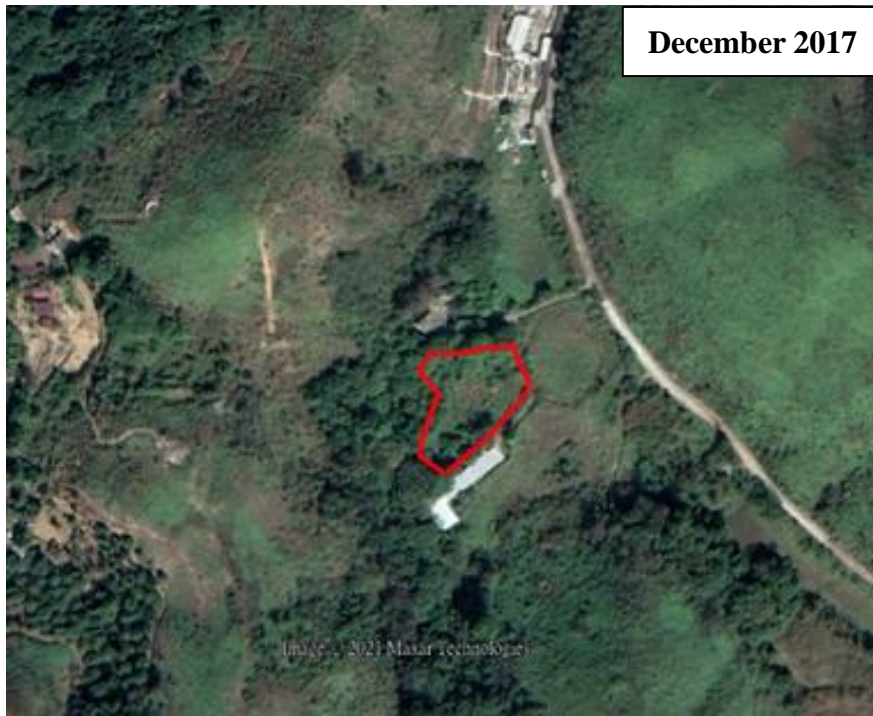
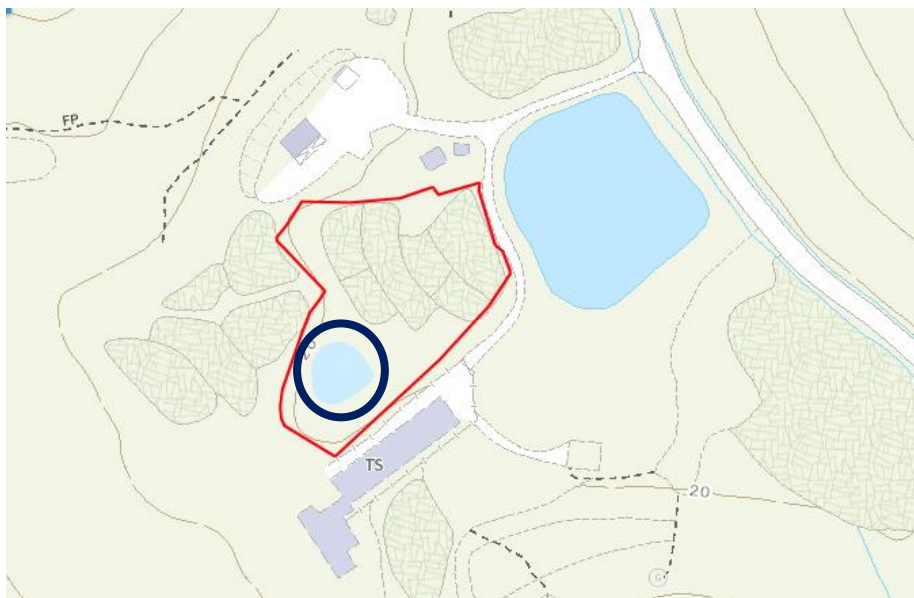


Figure 3 Referring to the Geoinfo map from Lands Department, a pond (circled in blue) can be spotted at the southwest of the site (marked in red)





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Figure 4-6 According to aerial photos, the subject site (marked in red) was subject to land formation and vegetation clearance in the past (Source: Google Earth)

